16 August 2022

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FDC Construction (NSW) Pty Ltd
22 - 24 Junction Street
Forest Lodge NSW 2037

Attention: Karina Agius

Dear Karina

Unexpected Finds Protocol - Contamination
Snack Brands Manufacturing Facility
2-14 Distribution Drive, Orchard Hills NSW 2748

1 Introduction

SSD 18204994 was granted development consent by DPE on 8 July 2022 for a new purpose-built industrial warehouse facility for industrial food manufacturing at 14 Distribution Drive, Orchard Hills and an adjustment to the operations of the existing warehouse and distribution facility at 2 Distribution Drive, Orchard Hills, to include food manufacturing.

This Unexpected Finds Protocol – Contamination (UFP) has been prepared to support the Construction Environmental Management Plan (CEMP) and is required to satisfy Condition B64 of SSD 18204994 Conditions of Consent.

2 Statutory Requirements

SSD 18204994 Conditions of Consent require a UFP to be prepared as part of the CEMP:

Unexpected Finds

> *B64. Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition C2 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.*

Sections 3-6 below satisfies the requirements above.

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3 Environmental Site Assessment

An Environmental Site Assessment (ESA) was prepared by JBS&G Australia Pty Ltd (2021) as part of the EIS for SSD 18204994. The objectives of the ESA were to characterise potential contamination at the site and assess the suitability of the site for the proposed use, or to make recommendations to enable such assessments to be made in the future.

As part of the ESA, a search of the NSW Environmental Protection Agency (EPA) databases were undertaken for the site and immediate surrounding properties. In summary:

- No prevention, clean-up or prohibitions notices has been issued under the *Protection of the Environment Operations Act* 1997 (POEO Act) for the site.
- No notices have been issued under the *Contaminated Land Management Act 1997* (CLM Act) for the site and immediate surroundings.
- The site or immediate surrounding are not on the list of NSW contaminated sites notified to the EPA.
- The site is not listed by EPA on the NSW Government per- and polyfluoroalkyl substances (PFAS) Investigation program.

An aerial photograph review, as well as a historic title review concluded that the site appears to have been predominantly used for agricultural and rural residential use.

On 26 March 2021, JBS&G undertook a site inspection which found that there were no overt indicators of potential land contamination such as ground surface staining/discolouration, odours, bulk chemical storage, industrial or illicit processes (such as drug manufacture, waste incineration, etc.) or fly-tipped materials.

Based on the history review and observations made during the JBS&G inspection of the site, areas of environmental concern (AECs) have been identified as the following primary contaminants of potential concern:

- Those from fill of unknown origin used to level the site, including:
  - Heavy metals;
  - Total recoverable hydrocarbons (TRH);
  - Benzene, toluene, ethylbenzene, xylene (BTEX);
  - Polycyclic aromatic hydrocarbons (PAHs);
  - Organochlorine pesticides (OCPs);
  - Polychlorinated biphenyls (PCBs); and
  - Asbestos.
- Those from historical use of the site for agricultural purposes, including:
  - Heavy metals;
  - OCPs; and
  - Asbestos.

4 Potential Unexpected Finds and Characteristics

4.1 What is an Unexpected Find?

An unexpected find is defined as potential contaminated land or asbestos that was not previously identified in the EIS, ESA, CEMP (and sub-plans) or during pre-construction investigations. For the purposes of this plan, contaminated land comprises land within the project area that meets the definition of contamination in *Contaminated Land Management Act 1997*, including asbestos.

4.2 Potential Unexpected Finds Characteristics

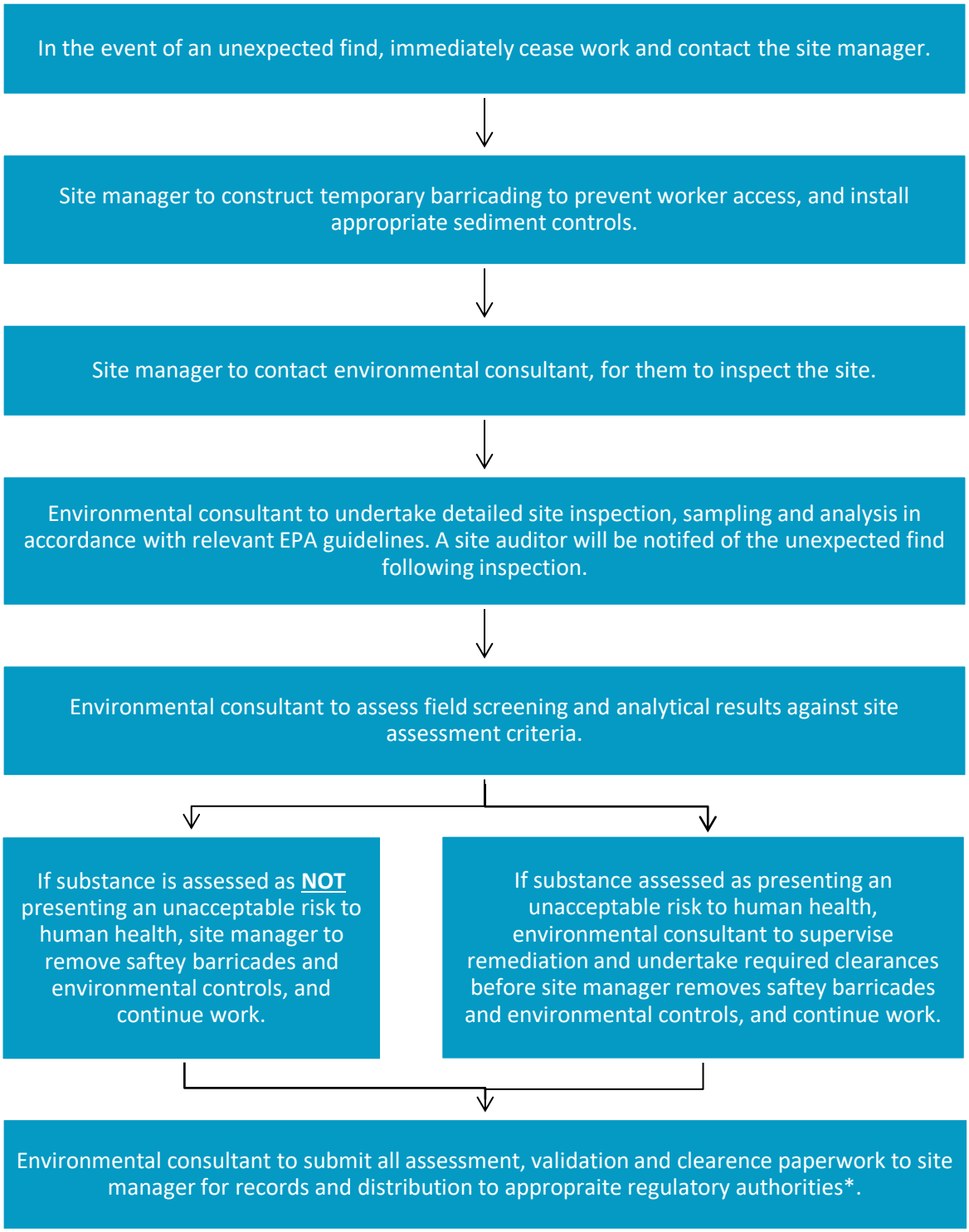
A summary and description of the types of unexpected finds that may be encountered during construction work, based on contaminants of potential concerns identified in the ESA, is presented in **Table 1** below.

Table 1 Unexpected Finds and Characteristics of Contamination

Potential Unexpected Find	Observed Characteristic	Type of Potential Contaminant
Petroleum hydrocarbons (e.g. fuels, oils and lubricants)	Identifiable by either odour and/or visual indications of contamination. Characteristic petrol, diesel or 'oily' odours (e.g. hydraulic oil) which may vary in strength from weak (just detectable) to very strong (easily detectable at a distance from the source). In soils, the odour may or may not be accompanied by specific areas of dark staining (black-grey) or larger scale discolouration of strata from a previously identified 'natural colour' (e.g. staining of orange and brown clay to dark grey and green.) May also be visible as a distinct coloured sheen on water within an excavation.	TRH, BTEX, PAH
Buried dry waste materials	Variety of construction and demolition waste materials including wood, plastic, metal fragments, building rubble such as concrete, brick, asphalt, asbestos containing materials etc.	Asbestos, heavy metals
Buried or surface bonded ACM, asbestos fines/friable asbestos	Cement-bound asbestos containing material (ACM) (e.g. compressed cement sheeting) may be present in building waste or pipes. Friable forms of asbestos including lagging and insulation, textured coatings and vinyl floor tiles may also contain asbestos. Fines and fibres are not typically visible to the unaided eye. Laboratory analysis is required to identify asbestos in soil.	Asbestos
Structures or conduits containing possible hazardous materials	Could be identified a buried storage tank or former pipelines (typically metal, concrete or plastic), deeper sand fill sometimes with visual/olfactory indications of contamination, or presence of small concrete footings surrounding by odorous of visually impacted soils and/or groundwater.	TPH, BTEX, PAH, asbestos

Potential Unexpected Find	Observed Characteristic	Type of Potential Contaminant
Ash or slag deposits	Ash materials are typically light weight, grey and white sand and gravel sized particles (1mm to 10mm). Slag materials can be varied in consistency and colour and may comprise pale grey to blue/green/grey and be loose or cemented. Slag gravels can be very angular and appear to have a 'honeycomb' texture.	PAH, heavy metals, can generate alkaline leachate
Landfill type material	Could include a combination of the other categories along with domestic (e.g. clothing), clinical (e.g. human tissue or hair, laboratory specimens etc.), and/or putrescible waste (e.g. food scraps, nappies, etc.).	Heavy metals
Buried Drums	Metal or plastic drums containing potentially unknown hazardous substances. Management of drum contents may require specialist hazmat contractors. Drums should not be opened to inspect contents until a qualified hazmat contractor has been engaged to assessed potential risks.	Various
Other unusual odours	Other unusual odours that a different from surrounding soils, such as a sweet odour could indicate the presence of chlorinated hydrocarbon contamination.	Various

5 Unexpected Finds Protocol



** Disposal location and results of material testing must be submitted to the Planning Secretary, prior to its removal from the site.*

6 Measures and Compliance

6.1 Roles and Responsibilities

The FDC Site Manager will retain the overall responsibility for implementing the unexpected finds procedure for all construction works undertaken within the project area.

6.2 Training

All construction workers will be made aware of, and trained, in the recognition of potential unexpected finds. Training will be undertaken as a part of general site induction and refreshed periodically at toolbox meetings.

Training will provide general awareness for recognition of potential contamination and hazardous materials, so that works can be suspended temporarily to allow evaluation by an appropriately qualified person. Project workers will be trained in identifying the following:

- Soil that appears to be contaminated based on visual and olfactory indicators;
- Asbestos (i.e. either bonded or friable);
- Groundwater or surface water that appears to be contaminated based on visual and olfactory observations (including potential hydrocarbon sheens on the water surface, free phase liquids such as petroleum fuel, discolouration etc.);
- Drums or USTs; and
- Fill containing waste (e.g. ash, slag, refuse, demolition materials).

6.3 Monitoring

Monitoring and inspection will be conducted in accordance with general inspections as outlined in Section 5.1 of the CEMP. Results and actions of monitoring and inspection are to be recorded as specified within the CEMP.

6.4 Reporting

Reporting will be conducted as outlined in Section 5.2 of the CEMP.

6.5 Audits

Audits will be conducted as outlined in Section 5.3 of the CEMP.

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
631.30781-L02-v1.1	16 August 2022	Megan Lowe	Anna Kleinmeulman	Karina Agius (FDC)
631.30781-L02-v1.0	29 June 2022	Megan Lowe	Anna Kleinmeulman	Karina Agius (FDC)