

CSSI 10051 - Sydney Metro response to Independent Audit 06

SM-24-00287454

Applicable to:	Sydney Metro Western Sydney Airport
Status:	Final
Date of issue:	08 October 2024

SM – WSA CSSI 10051

Sydney Metro Response to Audit No.6 Findings

Item	Ref	Type	Requirement	Finding	Recommended or completed action ¹	By Whom	Status ²	Sydney Metro Response
IA2 – OBS 1 Morasey Environment	A18	Observation	<i>Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A22 and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities.</i>	Observation SSTOM: The process for preparation of Site Establishment Management Plans under Condition A18 has not been addressed in the CEMP.	Review and update the CEMP to include the process for preparation of Site Establishment Management Plans under Condition A18.	SSTOM (PLM) / Sydney Metro	OPEN	As site establishment was undertaken for this project by the FIW contractors, there has been no requirement for any site establishment plans and all ancillary facilities are already considered under the CEMP. The CEMP will be updated to include a process for the potential use and preparation of a SEMP.
IA2 – OBS 2 Morasey Environment	A22	Observation	<i>Lunch sheds, office sheds, portable toilet facilities and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria: are located within or adjacent to the Construction Boundary; and have been assessed by the ER to have -</i>	Observation SSTOM: It is understood that the above MAFs were established at the beginning of the project, prior to preparation of the MAF Assessment checklists.	Review the A22 process, including proposed due diligence assessment with the ER. Ensure the process is documented and agreed with all parties prior to future implementation. If continued, ensure due diligence assessments are conducted prior to implementation of the activity.	SSTOM (PLM) / Sydney Metro	OPEN	A22 process will be reviewed and where applicable the CEMP will be updated. Sydney Metro and ER will review and agree on any updates to the CEMP as per Condition C10.
IA2 – OBS 3 Morasey Environment		Observation	<i>(i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.</i>	Observation SSTOM: The adopted 'due diligence' process for A22 MAFs has not been described in the CEMP.				
IA2 – OBS 4 Morasey Environment	A47	Observation	<i>The CSSI name, application number, telephone number, postal address and email address required under Condition B3 must be available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also</i>	Observation SSTOM: Signage posted at the main access to the Orchard Hills site did not comply with Condition A47 and was limited to Parklife Metro D&C Construction signage. NB: Evidence of compliant signage displayed at OHE was provided post-audit on 18/9/2024.	Review signage displayed at PLM sites and ensure it complies with the requirements of Condition A47, i.e. includes the CSSI name, application number, telephone number, postal address and email address.	SSTOM (PLM)	OPEN	PLM commit to review of all public facing signage to ensure compliance with Condition A47.

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			<i>be provided on the website required under Condition B11.</i>					
10051_IA6_1 Wolfpeak	B4	Observation	<p><i>A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the:</i></p> <p><i>(a) number of complaints received;</i></p> <p><i>(b) date and time of the complaint;</i></p> <p><i>(c) number of people (in the household) affected in relation to a complaint, if relevant;</i></p> <p><i>(d) method by which the complaint was made;</i></p> <p><i>(e) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</i></p> <p><i>(f) issue of the complaint;</i></p> <p><i>(g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and</i></p> <p><i>(h) if no action was taken, the reason(s) why no action was taken.</i></p>	<p>Observation: The Department requested that focus be provided on the completeness of the complaints register and the adequacy of actions taken to address/respond to complaints.</p> <p>The Auditor conducted a review of the Complaints Register (discussed further in Section 3.6) and completed a comparison between a set of complaints in the register against the corresponding full files in Consultation Manager.</p> <p>SCAW and FSM entries (4 in total for the audit period) in the Complaints Register appear to be representative of the issue / response and the responses appear to be adequate.</p> <p>SBT received 58 complaints during the audit period and by and large the Complaints Register appear to be representative of the issue / response and the responses appear to be adequate. That being said, there are some isolated instances whereby the 'nature of the complaint' in the summary Complaints Register issued to interested parties could be further elaborated on to reflect the issue as described in Consultation Manager. For example:</p> <ul style="list-style-type: none"> On 20/06/24 SBT received a complaint and the Register states that the complaint related to 'truck complaint, Orchard Hills'. The corresponding Consultation Manager file identifies that the complainant raised concerns about heavy vehicle speeding, driver behaviour, revving engine and compression braking. On 18/06/24 SBT received a complaint and the Register states that the complaint related to 'vehicle damage'. The corresponding Consultation Manager file identifies that the complainant raised concerns about the condition of the road at Orchard Hills which (according to the complainant) caused her to crash her car (with the car towed and the driver assessed and cleared at hospital). On 26/03/24 SBT received a complaint and the Register states that the complaint relates to 'Vibration felt at property and crack formed within home.' The corresponding Consultation Manager file identifies that the complainant raised concerns about the TBM vibration and cracking on their driveway, plus interactions with previous contractors. 	<p>The Project should consider including more information in the 'nature of complaint' section of Consultation Manager, so that this provides more meaningful information to those receiving the Complaints Register (i.e." the ER, EPA and Department).</p>	Sydney Metro	OPEN	Sydney Metro will work with the internal Communications team to ensure adequate and sufficient information is provided in the monthly Complaints Register in order for the Department to assess compliance on its submission.

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				<ul style="list-style-type: none"> On 23/03/24 SBT received a complaint and the Register states that the complaint relates to 'Dust and car wash good will offer.' The corresponding Consultation Manager file identifies that the complainant raised concerns about (in their view) construction work causing dust which is getting onto their property and whether there is assistance provided to residents to counteract these affects like free car-washing. The file also indicates that the complaint relates to all packages at Orchard Hills (not just SBT). On 15/05/24 SBT received a complaint and the Register states that the complaint relates to 'Noise, property damage and rubbish on front of property.' The corresponding Consultation Manager file identifies that the complainant raised concerns about (in their view) very noisy OOHW keeping them awake and that they have been noticing further cracks throughout the house (including in timber beams in the shed had a crack and also the laundry tiles). <p>Notwithstanding the above, the Auditor:</p> <ul style="list-style-type: none"> is of the view that the complaints were generally responded to in an adequate way. understands that Consultation Manager is the tool recording information on all touch points and inclusion of all details into a register that is meaningful to a broad audience is problematic <p>the Department can request additional information on complaints received at any time and this information is available within Consultation Manager.</p>				
10051_IA6_2 Wolfpeak	B11	Observation	<p><i>A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including:</i></p> <p>...</p>	<p>Observation SBT: For SBT it was observed during the audit that:</p> <ul style="list-style-type: none"> the Noise and Vibration CEMP Sub-plan on the CPBG website does not include the accompanying Annexures (and these annexures do not appear to have been published elsewhere). the Aerotropolis Site Audit Reports / Site Audit Statements on the CPBG website were Section B (not Section A). <p>This was rectified prior to the drafting of the Audit Report.</p>	The SBT website was updated with the current documents prior to writing this Report.	SBT (CPBG)	CLOSED	N/A

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			<i>(e) a current copy of each document required under the terms of this approval, which must be published within one (1) week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be;....</i>					
10051_IA6_3 Wolfpeak	B11	Observation	<p><i>A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including:</i></p> <p>...</p> <p><i>(e) a current copy of each document required under the terms of this approval, which must be published within one (1) week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be;....</i></p>	Observation SCAW: For SCAW it was observed during the audit that the Communications Strategies on the CPBUI webpage were not the current versions. This was rectified prior to the drafting of the Audit Report.	The SCAW website was updated with the current documents prior to writing this Report.	SCAW (CPBUI)	CLOSED	N/A
IA2 – OBS 5 Morasey Environment	B11	Observation	<p><i>A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including: ...</i></p>	Observation SSTOM: The latest version of the CTMP Orchard Hills Station is Rev02, dated 11/6/2024, as submitted to DPHI on 6/8/2024. The version of the CTMP on the project website was CTMP Orchard Hills Station, Rev0, dated 27/9/2023.	A review of the Sydney Metro and PLM website should be undertaken to ensure all documents are current.	SSTOM (PLM) / Sydney Metro	OPEN	PLM commit to review of all documents uploaded to the Project website to ensure compliance with Condition B11.
IA2 – NC03 Morasey Environment	C1	Non-Compliance	<p><i>Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures</i></p>	Non-compliance SSTOM: Section 3.4 (f) of the CEMF addresses the preparation of CEMPs and requires "The Principal Contractor CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the contract documentation and this CEMP".	<p>Review and update the SSTOM CEMP and SWMP to address requirements for the discharge of wastewater to sewer under the Sydney Water Trade Waste Agreement, as required by the SM-WSA CEMF Sections 3.4(f) and 12.2(a)(viii). An update to the Water Quality Monitoring Program (WQMP) may also</p>	SSTOM (PLM)	OPEN	<p>PLM commit to updating the CEMP and SWMP to include reference to the Trade Waste Agreement.</p> <p>The Surface Water Quality Monitoring Program will not be updated as this plan is not related to groundwater. The Groundwater Monitoring Program will be reviewed as required and to confirm</p>

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			<i>specified in the documents listed in Condition A1 will be implemented and achieved during construction.</i>	<p>Section 12.2 (a)(viii) of the CEMF addresses Soil and Water and requires "Principal Contractors will develop and implement a Soil and Water Management Plan for all off airport works ... will include as a minimum: The requirements of any applicable licence conditions".</p> <p>The Sydney Water Trade Waste Agreement (TWA) in place for discharge of wastewater to sewer from the St Mary's Water Treatment Plant (WTP) has not been identified in the SSTOM CEMF. The TWA and applicable conditions have also not been identified in the SSTOM Soil and Water Management Sub-Plan (SWMP).</p> <p>It is noted that the option to discharge to trade waste is presented (amongst other options) in the Groundwater Monitoring Program (SWMP, Appendix G), but no details are provided. The TWA was issued after the GWMP was prepared.</p>	be required to satisfy the TWA conditions.			Condition C16 (l) has been appropriately addressed.
10051_IA6_4 Wolfpeak	C22	Non-compliance (self-reported)	<i>The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</i>	<p>Non-compliance SCAW: On 15/05/24 SCAW identified via an internal audit a non-compliance has with Section 5.5 of the SM-WSA SCAW Surface Water Monitoring Program (SWMonP), and Section 7.2 of the SM-WSA SCAW Noise and Vibration Monitoring Program (NVMonP). This was a result of the submission provision of the 6 Monthly Construction Monitoring report to nominated recipients within 60 days of the reporting period.</p> <p>The 6 Monthly Construction Monitoring Report #2 issued to the Department and published on the SCAW Website on the 21/12/23 was not reported as being available for information to the EPA or PCC in accordance with the nominated recipients list in the monitoring programs. As the report was publicly available on the project website and based on consultation with Sydney Metro and the ER, an internal Non-Conformance was raised against the CEMF and submitted to Sydney Metro on 17/05/24.</p> <p>Sydney Metro state that on further reflection following this sixth Independent Audit in August 2024, it was identified that the Non-Conformance may possibly be a Non-Compliance with C22 and the decision was made to update to a Non-Compliance Report and issue to the Department on 19/08/24.</p>	On 19/08/24 this was reported to the Department in accordance with A44/A45.	SCAW (CPBUI)	CLOSED	N/A
IA2 – OBS 6 Morasey Environment	E1	Observation	<i>All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.</i>	Observation SSTOM: Internal haul roads at the Orchard Hills site were muddy and chip seal that had reportedly been applied 2 months prior had washed away and/or sunk into the ground. Destabilised haul roads in use by heavy vehicles could contribute to sediment load diverted to sediment basins, dust emissions, and increase the risk of sediment laden runoff from the HV access to Lansdowne Road. The	Review options and apply suitable measures for the ongoing stabilisation of internal haul roads.	SSTOM (PLM)	OPEN	PLM commit to ongoing review and management of haul roads.

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				Site Supervisor advised further stabilisation would be undertaken as necessary.				
10051_IA6_5 Wolfpeak	E36	Observation	<p>The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction.</p> <p>Where archaeological investigations have been undertaken as a result of Unexpected Finds notifications then a Final Archaeological Report must be provided in accordance with Heritage Council guidance and standard requirements for final reporting under Excavation Permits.</p> <p>Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately. Management of human remains in NSW is subject to requirements set out in the Public Health Act 2010 (NSW) and Public Health Regulation 2012 (NSW). Nothing in these conditions prevents separate procedures for the Unexpected Heritage Finds and Human Remains Procedure.</p>	<p>Observation FSM: On 27/04/24 LORAC encountered a heritage item and enacted the Unexpected Finds Procedure (UFP). However, LORAC did not notify the Metro Environmental Manager as required by the UFP. This was self-identified by LORAC and reported to Sydney Metro upon becoming aware of the deficiency. This was not considered a non-compliance by LORAC or Sydney Metro on the basis that the find was a continuation of a previously reported unexpected find and that LORAC implemented the corrective action process identified in its CEMP, including notifying the heritage specialist, reviewing the workpack structure and retraining the workforce in reporting requirements.</p>	LORAC implemented the corrective action process identified in its CEMP, including notifying the heritage specialist, reviewing the workpack structure and retraining the workforce in reporting requirements; and notifying Sydney Metro after the fact.	FSM (LORAC)	CLOSED	N/A
10051_IA6_6 Wolfpeak	E41	Non-Compliance (self-reported)	<p>Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances:</p> <p>(a) Safety and Emergencies, including:</p> <p>(i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or</p> <p>(ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or</p> <p>(b) Low impact, including:</p> <p>(i) construction that causes LAeq(15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and • no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and</p>	<p>Non-compliance SBT: On 21/04/24 3 separate incidents of Sydney Earthworks-owned spoil haulage trucks entering Orchard Hills site between 6.30am-7am via Gate K3 on Kent Road. This resulted in a community stakeholder complaint being received on 22/04/24. This was reported to Sydney Metro and EPA and at the time CPBG investigated the complaint as to whether the three spoil trucks from Sydney Earthworks identified as coming into site prior to 07:00am constituted a non-compliance. On 29/04/24 this was confirmed. On 06/05/24 this was reported to the Department in accordance with A44/A45. The auditees are not aware of any response from the Department or EPA in relation to the matter. SBT removed one driver from site and warned the other two drivers.</p>	On 06/05/24 this was reported to the Department in accordance with A44/A45. SBT removed one driver from site and warned the other two drivers.	SBT (CPBG)	CLOSED	N/A

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			<p><i>(ii) construction that causes: • continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or • intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); or</i></p> <p><i>(c) By Approval, including:</i></p> <p><i>(i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or</i></p> <p><i>(ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E42; or</i></p> <p><i>(iii) negotiated agreements with directly affected residents and sensitive land user(s); or</i></p> <p><i>(d) By Prescribed Activity, including:</i></p> <p><i>(i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunneling) are permitted 24 hours a day, seven days a week; or</i></p> <p><i>(ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or</i></p> <p><i>(iii) delivery of material that is required to be delivered outside of standard construction hours in Condition E38 to directly support tunnelling activities, except between the hours 10:00 pm and 7:00 am to / from the Orchard Hills ancillary facility; or</i></p> <p><i>(iv) haulage of spoil generated through tunnelling is permitted 24 hours per day, seven days per week except between the hours of 10:00 pm and 7:00 am to / from the Orchard Hills construction site; or</i></p>					

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			<p>(v) works within an acoustic enclosure are permitted 24 hours a day, seven days a week where there is no exceedance of noise levels or intermittent vibration levels under Low impact circumstances identified in Condition E41(b), unless otherwise agreed with the Planning Secretary; or</p> <p>(vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week.</p> <p>On becoming aware of the need for emergency work in accordance with (a)(ii) above, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. The Proponent must use best endeavours to notify as soon as practicable all noise and/or vibration affected sensitive land user(s) of the likely impact and duration of those work.</p> <p>Notes: 1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery</p>					
IA2 – NC01 Morasey Environment	E41	Non-Compliance (self-Reported)	<p>Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances: (b) Low impact, including:</p> <p>(i) construction that causes LAeq(15 minute) noise levels:</p> <ul style="list-style-type: none"> no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and <p>no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s)</p>	<p>Non-Compliance: SSTOM - NCR 004 was raised against Condition E41(b)(i) and related to operational noise from a generator at the SSTOM Orchard Hills site.</p> <p>Notification of the NC to DPHI was within the required 7-day timeframe, and a response from DPHI was received.</p>	N/A	SSTOM (PLM)	CLOSED	Actions closed by the project during the audit period.
10051_IA6_7 Wolfpeak	E46	Observation	<p>Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise and vibration levels are minimised around sensitive land use(s). Practices may include, but are not limited to:</p> <p>(a) use of regularly serviced low sound power equipment;</p> <p>(b) at source control, temporary noise barriers (including the arrangement of plant and equipment) around noisy</p>	<p>Observation SBT: There were 9 x complaints (from 1x receiver on Kent Road) regarding compression braking at Orchard Hills in the complaints register.</p> <p>The Auditor observes that whilst compression braking is a heavy vehicle safety feature and not prohibited on site, the NSW EPA states that exhaust brakes, engine compression or 'jake' brakes near residential areas and noise-sensitive areas such as hospitals and schools should be avoided, unless they are necessary for safety reasons.</p>	SBT installed Variable Message Signage was at Orchard Hills advising drivers not to use compression braking. SBT also conducted toolbox talks to advise drivers to minimise their use of compression braking where feasible.	SBT (CPBG)	CLOSED	N/A

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			<p>equipment and activities such as rock hammering and concrete cutting;</p> <p>(c) use of non-tonal reversing alarms; and</p> <p>(d) use of alternative construction and demolition techniques.</p>					
10051_IA6_8 Wolfpeak	E57	Non-Compliance (self-reported)	<p><i>In order to undertake out-of-hours work outside the work hours specified under Condition E38, appropriate respite periods for the out-of-hours work must be identified in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with:</i></p> <p>(a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work;</p> <p>(b) a description of the potential work, location and duration of the out-of-hours work;</p> <p>(c) the noise characteristics and likely noise levels of the work; and</p> <p>(d) likely mitigation and management measures which aim to achieve the relevant NMLs under Condition E43 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).</p> <p><i>The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the ER, EPA and the Planning Secretary prior to the out-of-hours work commencing.</i></p> <p><i>Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the RBL at any residence.</i></p>	<p>Non-compliance SCAW: On 25/07/24 SCAW identified that the E57 report prepared for was not submitted to the Department prior to the relevant OOHW commencing. Further, the report was not submitted to the EPA at all (due to this not being required under the terms of the EPL). This was reported in accordance with A44/A45.</p>	<p>The non-compliance was reported to the Department in accordance with A44/A4.</p>	SCAW (CPBUI)	CLOSED	N/A
IA2 – OBS 7 Morasey Environment	E124	Observation	<p><i>Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations</i></p>	<p>Observation SSTOM: REMM WR3 requires a material tracking system would be implemented for material transferred between construction sites. The process outlining requirements for the movement of spoil, ENM & VENM between PLM EPL premise sites was not adequately documented in the Waste Management Sub-plan.</p>	<p>Provide evidence for the approval for the movement of spoil, ENM & VENM between PLM EPL premise sites. Document the process for the movement of spoil, ENM & VENM between PLM EPL premise sites in the Waste Management Sub-plan.</p>	SSTOM (PLM)	OPEN	<p>PLM commit to updating the Waste Management Sub-plan to document the process for the movement of spoil, ENM & VENM between PLM EPL premised sites (including on-airport sites).</p>

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IA2 – OBS 8 Morasey Environment		Observation	<i>(Waste) Regulation 2014, or to any other place that can lawfully accept such waste.</i>	Observation SSTOM: The STM Material Tracking Register (St Marys) did not include all required details, as documented in Section 5.5.1 of the SSTOM WMP. Details missing included: Haulage contractor, Material Type, Waste Reveal Location, Docket numbers.	Review and update the Material Tracking Register template to include all required details, as documented in Section 5.5.1 of the SSTOM WMP. It is also recommended that a reference to the corresponding Waste Classification Report is included in the Material Tracking Register.	SSTOM (PLM)	OPEN	Since the findings of the audit were made, PLM has updated the WMP (Rev01.02) and now includes the additional information requested. PLM commit to reviewing this update in the context of OBS 7 and 9.
IA2 – OBS 9 Morasey Environment		Observation		Observation SSTOM: Receiving Facility with EPL No. 20984 was not listed in the Register of indicative waste disposal locations, Appendix D of the SSTOM WMP.	Update the Register of indicative waste disposal locations, Appendix D of the SSTOM WMP to include approved disposal locations and EPLs.	SSTOM (PLM)	OPEN	PLM commit to updating the Waste Management Sub-plan to document the currently approved waste disposal locations, noting that this Appendix will remain indicative as disposal locations may be deleted or added depending on internal PLM procurement of supplier services.
IA2 – OBS 10 Morasey Environment	E128	Observation	<i>Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. By Landcom, 2004 (The Blue Book).</i>	Observation SSTOM: St Marys: The status of the stormwater connection across the hardstand section of the St Marys station site was unable to be confirmed. ERSED controls for stormwater grates may be inadequate.	Confirm stormwater connection status. If connected, additional controls should be applied to stormwater grates to reduce the risk of sediment entry.	SSTOM (PLM)	OPEN	It is noted at the time of the audit inspection the SBT contractor was in control of the adjacent portion at the STM site. An ICD (interface control document) between SBT and PLM was in place to manage rainwater transferring from SSTOM to SBTs as PC. PLM can confirm that all water flows to the sump at the low point and can be pumped back to water treatment plant as required. No off-site discharge risk exists at the observed stormwater grates.
IA2 – OBS 11 Morasey Environment		Observation		Observation SSTOM: Orchard Hills: The cattle grid had filled with sediment-laden water and was overflowing onto Lansdowne Road at the heavy vehicle access. Sediment-laden water could also be seen moving across the hardstand driveway onto the nature strip. ERSED controls in place were inadequate. There was no stormwater infrastructure in place along the road, with runoff directed to the nearest waterway.	Review ERSED controls in place at the HV access on Lansdowne Road, including placement of the cattle grid, to reduce the risk of sediment laden water leaving the site. The dirty water stream may be able to be diverted to the nearby sediment basin (SE Basin).	SSTOM (PLM)	OPEN	PLM have since increased ERSED controls at the OHE HV access by installing wheel wash and extending the concrete berm to direct surface water runoff into the adjacent sediment basin.
IA2 – NC02 Morasey Environment	E128	Non-Compliance (Self-Reported)	<i>Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).</i>	Non-compliance SSTOM: A NC with Condition E128 (SSI 10051) was raised by the project and notified to DPHI on 27/2/2024. The erosion and sediment controls (ESC) in certain areas of the Orchard Hills (OHE) site were not installed or maintained in a timely manner or before undertaking work, as per the project Erosion and Sediment Control Plan (ESCP), which included: <ul style="list-style-type: none"> The batters located on the northwestern portion of the site were not completely stabilised. Batter chutes located on the northwestern portion of the site were installed, but geofabric stabilisation requires pinning. 	N/A	SSTOM (PLM)	CLOSED	Actions closed by the project during the audit period.

Item	Ref	Type	Requirement	Finding	Recommended or completed action ¹	By Whom	Status ²	Sydney Metro Response
				<ul style="list-style-type: none"> Rocked lined drain leading to the basin south of Lansdowne Road had not been maintained. Batters above swale drain the drains to the OHE basin were not stabilised, resulting in increased sediment load being captured in the swale drain checks and basin. <p>It is noted that the above actions were previously identified during fortnightly inspections with Sydney Metro and the ER, and timeframes for the identified actions were not closed in the agreed timeframes, resulting in the identified non-compliance.</p>				
10051_IA6_9 Wolfpeak	E128	Observation	<i>Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).</i>	Observation SCAW: It was observed during the audit site inspection that a portion of sediment fence was not properly installed at the Defence site. The Auditor observes that the area of concern is not in a high-risk location with respect to erosion or sedimentation.	The sediment fence was repaired prior to 05/09/24 as evidenced by the ER Inspection Report on that date.	SCAW (CPBUI)	CLOSED	N/A