6 August 2025

John Holland Pty Ltd
Level 5, 15 Bourke Road
Mascot, NSW, 2020

Ref: E081

Attention: Trent Doyle

Sent via Email: Trent.Doyle@jhga.com.au

Dear Trent,

Re: Interim Audit Advice No. 2 – Illabo to Stockinbingal (I2S) Inland Rail Sampling, Analysis and Quality Plan (SAQP)

Introduction

I have been engaged by John Holland Pty Ltd (JH) to conduct a site audit of the above site in accordance with the NSW Contaminated Land Management Act 1997.

The Illabo to Stockinbingal Inland Rail Project (I2S) is a new section of rail corridor (42.5km) connecting Illabo to Stockinbingal in NSW. The project forms part of the national Inland Rail program to deliver a direct interstate freight rail corridor between Melbourne and Brisbane via central-west NSW and Toowoomba Qld. The I2S works include installation of 39km of new single track, removal of redundant sections of track and upgrade of existing track for tie-in points to the existing rail at Illabo and Stockinbingal, a crossing loop and maintenance siding of around 2.2 km long and track turn-outs at eight locations.

The project is state significant infrastructure (SSI-9406) and has been assessed under section 5.13 of the Environmental Planning and Assessment Act 1979 (EP&A Act), requiring an environmental impact statement[1] (EIS). Approval was issued by the Minister for Planning and Public Spaces on 4 September 2024 subject to conditions of which Conditions E151-161 relate to contamination.

Condition E154 states: "*A Sampling and Analysis Quality Plan (SAQP) must be completed prior to Detailed Site Investigations being undertaken. The SAQP must:*

(a) be prepared by a suitably qualified and experienced contaminated land consultant(s) in accordance with the relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (CLM Act);

(b) be prepared where construction or land disturbing activity is to be undertaken, on sites identified as medium to high risk sites as identified in the documents referred to in Condition A1, to ensure that field investigations and analyses will be undertaken in a way that enables the collection and reporting of reliable including (where applicable) the relevant site characterisation requirements of the detailed or targeted site investigations; and

(c) inform the development of Detailed Site Investigations.

Condition E151 states that the site auditor is to review all documentation relating to contamination and "*…provide a written opinion on the contamination risk and the appropriateness of the reports and any proposed management measures of the site….*". Specifically Condition E151(b) relates to audit review of the SAQP identified in Condition E154.

Scope

I have been asked by JH to review the following document:

[1] Illabo to Stockinbingal Environmental Impact Statement (EIS) (ARTC/Inland Rail). Dated 29 August 2022.

- Sampling and Analysis Quality Plan – Inland Rail – Illabo to Stockinbingal. McMahon Earth Science. 30 July 2025 V3 (and earlier draft versions).

In reviewing the SAQP I have also considered the following documents:

- EIS Technical Paper 14 – Contaminated Land Assessment. Ref: 2-0001-220-EEC-00-RP-0003.
- EIS Chapter 20: Soils and Contamination.
- I2S Updated Mitigation Measures (April 2024) (*UMM*)
- Conditions of Approval for Inland Rail – Illabo to Stockinbingal SSI-9406 (*the approval*)

This interim audit advice letter (IAA) has been prepared to document my review of the SAQP and provide my written opinion on the contamination risk and appropriateness of the plan.

Review of the SAQP

I have reviewed earlier versions of the SAQP, and I note that Version 3 (dated 30 July 2025) incorporates my previous comments and now provides sufficient detail to support the proposed investigation works. A summary of my findings is documented below.

Ten Areas of Environmental Concern (AEC 1-10) have previously been identified as part of the EIS (specifically Technical Paper 14), based on a review of site history and inspections. The ten AECs relate to historical rail operations, farm operations and chemical storage, machinery use, and localised dumping. Each AEC was qualitatively assessed using a source-pathway-receptor model and ranked according to the potential for contamination to pose an exposure risk under a proposed commercial/industrial land use scenario. Most of the AECs were assessed to represent low risk, with three sites (AEC 2, 3 & 7) assessed as medium risk. No high-risk AECs were identified.

The SAQP includes a re-evaluation of preliminary risk ratings based on additional site inspections and a more detailed review of site history information for each AEC. A summary of the AECs and risk rating assigned by McMahon in the SAQP is provided in Table 1 below.

The only material change, compared to Technical Paper 14, was a downgrade of AEC 7 from moderate to low risk, as the observed stockpiled material (wood, concrete and minor debris) was limited in extent and showed no evidence of contamination. A new AEC (AEC 11) was also added (medium to high risk) following identification of a shearing shed with associated yards, foot rot bath, and former sheep dip.

Table 1: SAQP Areas of Environmental Concern & Contamination Risk Rating

AEC	Details	Risk	Proposed Investigation
AEC 1 & 2	Stockinbingal Station (machinery storage & maintenance, refuelling, spray rig filling, sheds and silos).	Medium to high	Detailed site investigation.
AEC 3	Four grain silos and machinery associated with the silos including tractors and multi-feeders within a private property. Filled gully, farmhouse/sheds (hazardous building materials), horse arena (fill).	Medium	Targeted soil investigation.
AEC 4	Bethungra Rural Fire Brigade service shed and water tank. Site history suggests that the site was vacant prior to the construction of the Bethungra Rural Fire Service shed, which was constructed and occupied in 2011. Site located outside project site – risks relate to leaks and spills that may have migrated onto the project site.	Low	Targeted soil investigation to confirm low risk to project site.
AEC 5	Small area within a rural property, locked chemical shed and drums of herbicides noted. Site located outside project site – risks relate to leaks and spills that may have migrated onto the project site.	Low	Targeted soil investigation to confirm low risk to project site.

Table 1: SAQP Areas of Environmental Concern & Contamination Risk Rating			
AEC	**Details**	**Risk**	**Proposed Investigation**
AEC 6	Fox bait signs noted on gate to a property.	Low	Targeted soil investigation to confirm low risk to project site.
AEC 7	Dumped material and stockpiles adjacent to the proposal site particularly at road crossings. Only one stockpile was identified and included in the SAQP – remaining stockpiles are to be managed by unexpected finds procedure.	Low	Waste classification of stockpile. Targeted soil investigations of stockpile footprint following stockpile removal.
AEC 8, 9 & 10	Fill used in construction of original rail line. Rail ballast (asbestos, fuel leaks). Waste disposal (dumping) along alignment & weed suppression activities. If stockpiles are encountered along the alignment, these will be managed by the Unexpected Finds Procedure for Contamination.	Low	Targeted soil investigations along rail line to confirm low risk to project.
AEC 11 (unexpected find)	Rural property located within project alignment. Former sheep shearing shed, yards, & associated foot rot bath. Evidence suggests a sheep dip may have been present. Stockpiles of concrete located around property.	Medium to high.	Detailed site investigation.

In my opinion, the risk ratings adopted in the SAQP are appropriate and consistent with the available site history and recent site inspections. The reclassification of AEC 7 from moderate to low risk, is justified based on site history and field observations. The inclusion of AEC11, identified as a moderate to high contamination risk, is also considered appropriate given its potential former use as a sheep dip.

My review of key aspects of the SAQP against the requirements listed in the *NSW EPA (2020) Guidelines for Consultants Reporting on Contaminated Land*, specific to a SAQP is provided in Table 2 below.

Table 2: Review of Key Aspects of SAQP		
Item	**Description**	**Audit Comment**
Document control	Document is clearly marked as Rev 2, dated 25 July 2025, with authorship and client noted. Author – David McMahon (Certified Environmental Practitioner – Site Contamination Specialist 1199).	Appropriate Author certification is considered suitably qualified and experienced.
Objectives	Objectives are clearly stated in Section 2 to: - Satisfy Condition E154 of the approval i.e. investigation of medium to high risk sites identified in documents listed in Condition A1 of the approval (i.e. AEC 2, 3 & 7) - Satisfy requirements of UMM SC-4 (Contamination Investigations) i.e. investigation of the following medium-low risk sites: AEC 2, 3, & 5-10.	Appropriate
Scope of work	Scope of work identified in Section 3 & Table 1 of the SAQP as follows: - Medium to high risk sites will be assessed using detailed site investigations (to assess site suitability) except for AEC 3 which will be addressed in the first instance by targeted soil investigations. - Low risk sites: targeted (limited) site investigation to confirm low risk status. AEC 7: small stockpile (5m^3) has been downgraded to low risk on the basis that is located outside the project alignment, and no ACM was noted during the site inspection. Raised dam walls must be assessed for presence of fill as part of the dam dewatering protocol.	Appropriate Trigger for implementation of a sampling program for dam walls must be included in dam dewatering protocol.

Table 2: Review of Key Aspects of SAQP		
Item	**Description**	**Audit Comment**
	The Unexpected Finds Protocol for Contamination (UFPfC) will be triggered where contamination is encountered outside of identified AECs.	
Site identification	Addresses, Lot/DP identifiers and investigation areas for each AEC are listed in Section 4 of the SAQP. The investigation boundaries for each AEC were defined based on a combination of the construction alignment, historical sources of contamination, and potential contaminant migration pathways. For example, in the case of AEC3, the boundary was expanded following site inspection and review of aerial photographs, to include a farmhouse, associated sheds, a horse arena, and an infilled gully.	Appropriate Note that a site survey of the area of investigation will be required for the investigation reports.
Site conditions and Surrounding Environment	Available information on site conditions and the surrounding environment has been documented for each AEC. The sites are located in a regional rural setting, and as such, available data is limited. Site condition details were compiled from a combination of available sources and site inspections. Site history was based on a review of historical aerial photographs (noting that image quality was variable due to the regional context), land title information, web-based research, and anecdotal accounts. Safework NSW records were also consulted for the Stockinbingal Station site (AEC 1 & 2).	The reported information does not include all the items listed in the ASC NEPM Field Checklist "Site Information". However, the site history draws on a reasonable range of sources given the regional setting and limited data availability and is sufficient to support the identification of AECs and the development of an appropriate sampling program.
Conceptual site model	A CSM describing potential sources & mechanisms of contamination, media, COPCs, pathways & receptors is documented for each AEC.	Appropriate
Assessment criteria	Assessment criteria are listed in Table 2 of the SAQP and are based on a commercial/industrial exposure scenario on the basis that the final use of the project area will be an operational rail corridor. For areas that may be returned to agricultural or other non-rail uses following the construction phase, the SAQP recognises that final land use is presently uncertain. To address this, a Request for Information (RFI) has been issued to Inland Rail Pty Ltd seeking clarification on final corridor boundaries and land use intent. Site specific criteria will be defined once final land use is determined, and in the interim these areas will be assessed by reference to background concentrations.	Appropriate
Sampling and analysis strategy and Sampling Methodology	Data quality indicators (DQOs), sampling design, and QA/QC to be undertaken are clearly documented. For medium to high risk sites, a systematic grid-based sampling pattern will be adopted, with sampling densities sufficient to meet minimum requirements in NSW EPA (2022) *Sampling Design Guidelines*. Targeted (judgmental) sampling will be used for low risk sites to confirm the expected low contamination risk, with locations selected based on observed or inferred sources. COPC are clearly defined and are consistent with the site history. The SAQP clearly states that asbestos will be investigated using asbestos quantification (as defined in the NEPM, 2013) using 10L screened samples (for ACM) and 500mL samples for analysis at the laboratory. However, there are two references to analysis of asbestos (trace) are included in the analyte list for AEC 1&2 and AEC 8,9 & 10. In each case asbestos quantification sampling is documented in the sampling methodology. Field QA/QC: One intra-laboratory duplicate, and one inter-laboratory duplicate will be collected per 20 primary samples. One rinsate blank, one trip blank, and one trip spike will be collected per sampling day. PID screening will be undertaken on all soil samples prior to laboratory selection. All sampling equipment will be decontaminated between sampling, using Decon 90 and potable water. Dedicated, disposable nitrile gloves will be used for each sample. Samples will be collected by hand or excavator.	Appropriate If contamination is encountered at low-risk sites, additional sampling will be triggered. It is assumed that reference to asbestos (trace) analysis in some individual appendices is a typographical error and asbestos analysis will be undertaken as listed in DQO 7 of the SAQP (page 20) being asbestos quantification in accordance with NEPM (2013) requirements.

Table 2: Review of Key Aspects of SAQP		
Item	**Description**	**Audit Comment**
Data quality indicators	Data will be assessed in accordance with defined DQIs. Key indicators include precision (RPD <30% for metals, <50% for other analytes), accuracy (spike recoveries within acceptance limits), and representativeness of sampling. Data validation will consider holding times, blank contamination, laboratory QC, and field QA/QC results.	Appropriate

Conclusion

The sampling methodology has been appropriately designed to reflect the level of contamination risk at each AEC, with grid-based sampling adopted for moderate to high-risk areas and targeted (judgmental) sampling proposed for low-risk sites. The proposed DQOs, QA/QC and DQIs are acceptable and will support the collection of reliable data to meet the objectives of the investigations.

In conclusion, I have reviewed the SAQP (Rev 2, dated 14 July 2025) and find this to be appropriate.

* * *

Consistent with the NSW EPA requirement for staged 'signoff' of sites that are the subject of progressive assessment, remediation, and validation, I advise that:

- This advice letter does not constitute a Site Audit Report or Site Audit Statement and does not pre-empt the conclusions that will be made at the conclusion of the site audit process.
- At the completion of the audit, I will provide a Site Audit Statement and supporting documentation.
- This interim audit advice will be documented in the Site Audit Report.

Yours faithfully,
Envirocene Pty Ltd

Julie Evans
NSW EPA Accredited Site Auditor 1003