

CONTRACTOR

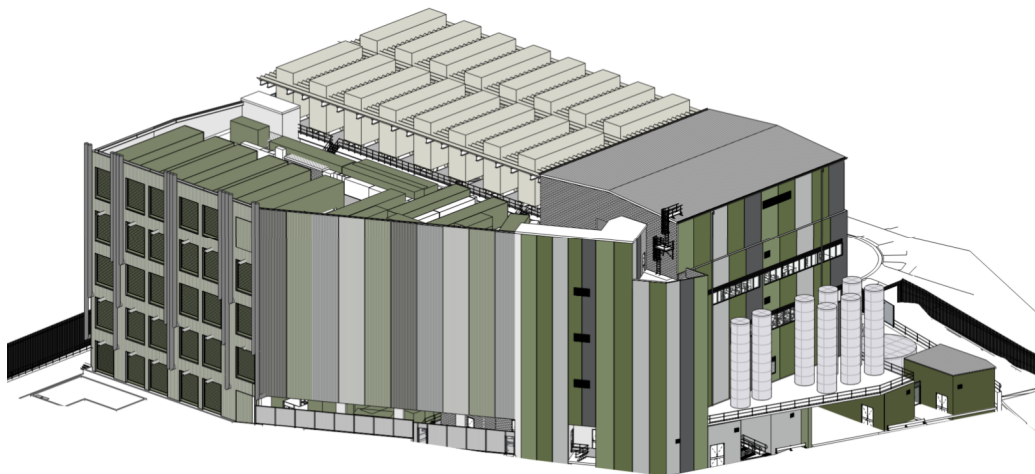
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CLIENT



PROJECT

SYD2 Shell E - Apollo Place Data Centre

TITLE

UNEXPECTED FINDS PROTOCOL

ORIGINATOR



REVISION HISTORY

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ATSYD2

PROJECT
CODE

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IDENTIFIER

S&C

PHASE
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MAP

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CODE

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02

REVISION

Apollo Place Data Centre, Lane Cove West NSW

16 July 2026

Unexpected Finds Protocol





Document Information

Unexpected Finds Protocol, Apollo Place Data Centre, Lane Cove West NSW

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Revision	Date	Author	Reviewed	Approved	Detail
0	8 May 2026	Naomi Lukeman	Andrei Woinarski	Andrei Woinarski	
1	16 July 2026		Naomi Lukeman	Naomi Lukeman	Final

Project Manager: Naomi Lukeman

Project Director: Jason Clay

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Senversa acknowledges the traditional custodians of the land on which this work was created and pay our respect to Elders past and present.



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1.0 Introduction and Objectives

Senversa Pty Ltd (Senversa) was engaged by EMKC3 to prepare an unexpected finds procedure (UFP) for construction phase of a proposed development of a data centre located at 1 Apollo Place & 1 Sirius Road, Lane Cove West, NSW (the site). The site is currently comprised of two individual properties which are legally defined as Part Lot 1 in Deposited Plan (DP) 1271404, and Strata Plan (SP) 80721 as presented on **Figure 1**.

The site encompasses an area of approximately 0.55 hectares (ha) and is currently zoned as 'E4 – General Industrial' under the Lane Cove Local Environmental Plan 2009. The site is bounded to the north and west by a large data centre.

EMKC3 has submitted a state significant development application (SSDA) to the Department of Planning, Housing and Infrastructure (DPHI) to develop the site for commercial/industrial use as a data centre that will be an extension of the neighbouring data centre project. The proposed extension of the data centre is understood to comprise a four-storey commercial structure, a separate high voltage switch room and 27 individual parking lots.

The Secretary's Environmental Assessment Requirements (SEARs) (SSD-67407231) required a series of environmental assessments be undertaken. Contamination assessments and management plans have included:

- Preliminary Site Investigation (PSI): Senversa prepared a PSI in May 2024¹ to assess the potential for contamination to be present based on current and/or historical site practices. The PSI recommended that a detailed site investigation be undertaken to assess the site conditions with regard to contamination.
- Detailed Site Investigation (DSI): Due to access constraints and client requirements, intrusive assessment was only undertaken on the western portion of the site, namely Part Lot 1 in DP 1271404. This investigation was reported in Senversa (2024a²). No intrusive sampling was undertaken by Senversa in SP 80721; however, data from the PSI report, as well as a data review of a Douglas Partners report which assessed below ground conditions on SP 80721 were used to form conclusions and recommendations on the whole site.
- The DSI report (Senversa 2024a) recommended that a remedial action plan (RAP³) be prepared to address elevated concentrations of organochlorine pesticides in some soils, and to close out a series of data gaps. The data gaps were addressed by an intrusive assessment undertaken in December 2024 (Senversa, 2024b⁴), and the RAP was updated and reissued in May 2026 (Senversa, 2026).

It is intended that following successful implementation of remedial and validation strategies outlined in the RAP (Senversa, 2026), as well as adherence to the sites Construction Environmental Management Plan (CEMP) and management of any unexpected finds of contamination using the methods outlined in this document, that the site will be considered suitable for the proposed use.

¹ Senversa Pty Ltd (May 2024) *Preliminary Site Investigation Apollo Place Data Centre, Lane Cove West Rev 1*.

² Senversa Pty Ltd (June 2024a) *Detailed Site Investigation Apollo Place Data Centre, Lane Cove West Rev 1*

³ Senversa Pty Ltd (2026) *Remedial Action Plan Rev 1*

⁴ Senversa Pty Ltd (December 2024b) *Detailed Site Investigation Apollo Place Data Centre, Lane Cove West*



2.0 Unexpected Finds Protocol

This unexpected find procedure (UFP) is provided to manage potential risks posed by unexpected finds of contamination (considered most likely to comprise unexpected asbestos containing material or fill material impacted with pesticides or hydrocarbons) during the construction phase in accordance with recommendations presented in the remedial action plan (RAP) prepared by Senversa in May 2026.

Unexpected finds may cause impact if disturbed or improperly handled. This plan relates to the measures required to identify unexpected finds and their mitigation procedures.

Table 2.1 includes details of the relevant contacts who will be responsible for the site, and the management of any UF.

Table 2.1: Responsible Persons

Company	Role	Responsibilities
Air Trunk	Site Owner	Overall responsibility for workplace health and safety (WHS) and informing site users of the applicability of any plans relating to the site (note this may be delegated to the PC or EC or others as required). Responsible for reporting issues/incidents to relevant authority as necessary (e.g. NSW EPA, LGA, SafeWork)
AW Edwards	Principal Contractor (PC)	Principal Contractor for civil and earthworks. Responsible for ensuring all site workers are trained in the application of the UFP and able to confidently implement the procedures within.
EKMC3	Project Manager	SSDA program project manager.
Senversa	Environmental Consultant (EC)	<u>Point of contact for unexpected finds.</u> Soil sampling for validation and/or off-site disposal. Provision of visual clearance certificates for non-friable asbestos removal work.

2.1 Definitions of Unexpected Finds

An unexpected find may include, but not be limited to:

- Buried asbestos containing material (ACM) or ACM found at the surface of the site. ACM may be bonded or friable and may take many forms (e.g., concrete tiles, vinyl tiles, lagging, pipes, roof tiles, etc.).
 - Bonded asbestos is defined as 'material containing asbestos that is not friable asbestos. Including materials containing asbestos fibres reinforced with a bonding compound', which therefore includes bonded fibre cement products.
 - Friable asbestos is defined as 'material that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry, and contains asbestos'.
- Discoloured and/or malodorous soils.
- Discoloured and/or malodorous groundwater/liquid seepage.
- Buried waste materials e.g., general refuse, animal waste (carcasses, eggs), contaminated waste.
- Septic tanks.
- Underground fuel storage tanks and associated fill points, pipes.
- Any unanticipated archaeological discovery e.g., aboriginal relicts or items of significance.

Examples photographs of unexpected items which may be encountered are displayed below:



			
Asbestos Fragment	Asbestos Fragments	Asbestos pipes	Stained Soil
			
Underground Fuel Tank	Fuel Lines	Aboriginal Artefact	Non Aboriginal Artefact

2.2 UF Process

Procedure to be followed in case of an Unexpected Find

Should an unexpected find be encountered during the works, the following procedure (Steps 1-7) should be followed:

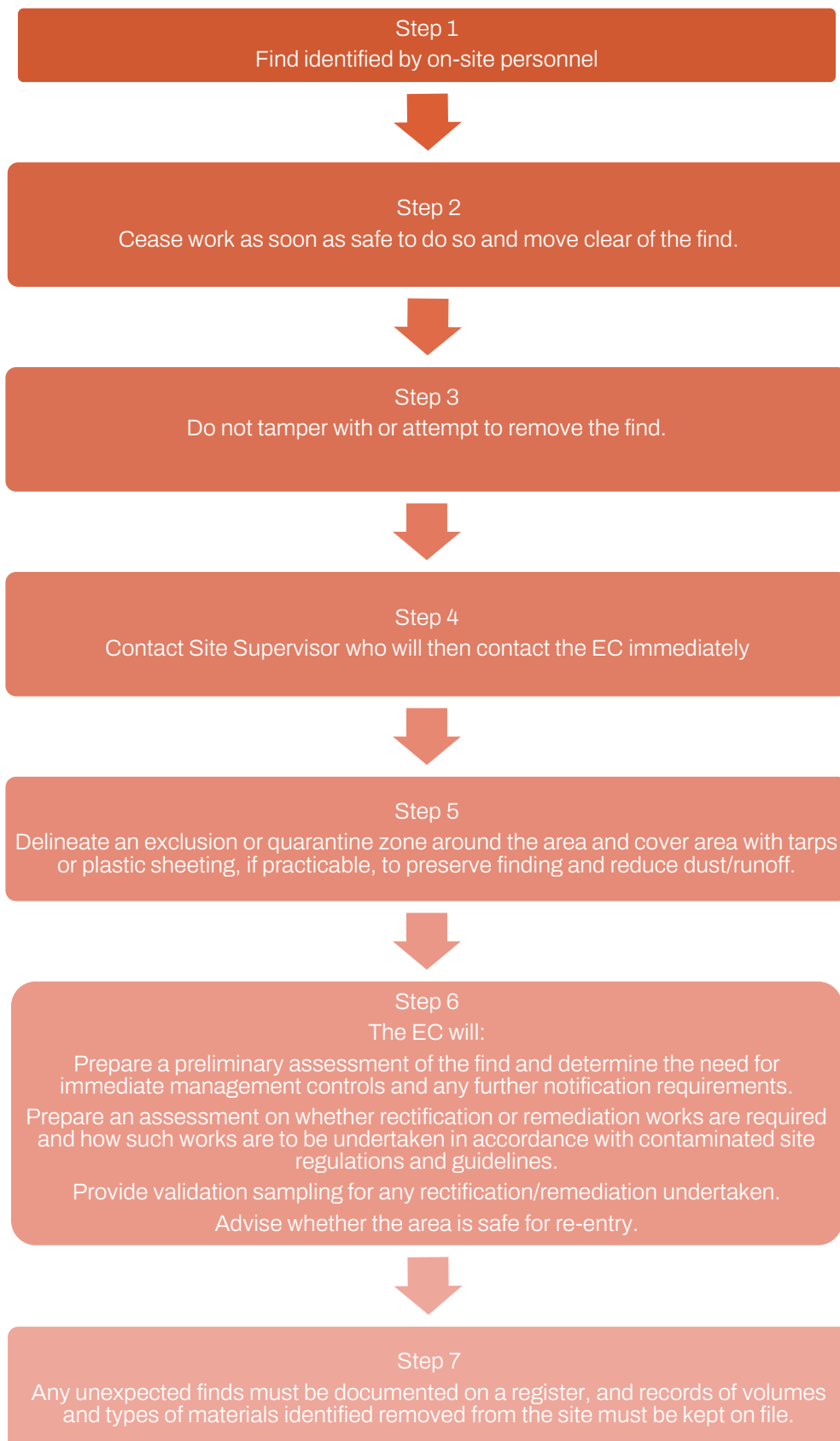
1. Find identified by on-site personnel.
2. Cease work as soon as safe to do so and move clear of the find.
3. Do not tamper or attempt to remove the find.
4. Contact Site Supervisor who will then contact the EC immediately.
5. Delineate an exclusion or quarantine zone around the area and cover area with tarps or plastic sheeting, if practicable, to preserve find or help reduce dust/runoff.
6. The EC will:
 - Prepare a preliminary assessment of the find and determine the need for immediate management controls and any further notification requirements.
 - Prepare an assessment on whether rectification or remediation works are required and how such works are to be undertaken in accordance with contaminated site regulations and guidelines.
 - Provide validation sampling for any rectification/remediation undertaken.
 - Advise whether the area is safe for re-entry.



7. If the find is a heritage find (either Aboriginal and non-Aboriginal) then:
 - all work in the immediate vicinity of the suspected relic(s) must cease immediately;
 - Heritage NSW must be contacted immediately; and
 - the suspected relic(s) must be evaluated, recorded and, if necessary, excavated by a suitably qualified and experienced expert in accordance with the requirements of Heritage NSW.
 - Work in the immediate vicinity of any suspected non-Aboriginal or Aboriginal archaeological relic(s) must not recommence until this has been authorised by Heritage NSW
8. Any unexpected finds must be documented on a register, and records of volumes and types of materials identified removed from the site must be kept on file.



Unexpected Find Procedure Flowchart





Example Unexpected Finds Register

Unexpected Find Number	Date encountered	Person / Company	Location	Type	EC Contacted
UF01	XX/XX/2026			Spill/excavation of suspect material/underground tank/other	Yes/No



Figures

Figure 1: Site Location Plan





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Legend

- Lot Boundary
- Site Boundary

Created: E. Marha
Reviewed: N. Lukeman
Approved: N. Lukeman
File: S21048_005_F001_Site Location

Date: 20/06/2024
Revision: 0
Scale: 1:1300 (A3)

0 10 20 30 40 50 m

Coordinate System: GDA2020 / MGA zone 56

Figure No: 1

Title: Site Location

Project: Remedial Action Plan

Location: 1 & 2 Apollo Place, Lane Cove West. NSW

Client: EMKC3

Senversa Pty Ltd

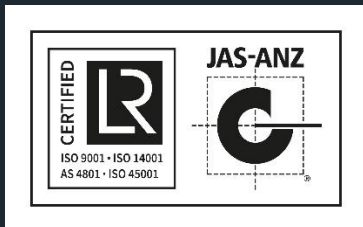
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