Dear Sirs

Addendum to Phase 1 Contamination Assessment
Proposed Wilton Junction Rezoning
Hume Highway and Picton Road, Wilton, NSW

1. Introduction

Douglas Partners Pty Ltd (DP) was commissioned by Bradcorp Holdings Pty Ltd (Bradcorp) to prepare an addendum to the DP report titled Phase 1 Contamination Assessment, Wilton Junction, Hume Highway and Picton Road, Wilton, report 73467.00.Rev6 dated 18 June 2014 (DP, 2014; ‘the PCA’). The PCA was prepared by DP for a land parcel known as Wilton Junction, situated at the intersection of Picton Road and Hume Highway, Wilton.

It is understood by DP that the Wilton Junction land parcel is subject to a proposed rezoning, with four key stakeholders involved in the site’s development including Lend Lease Building Pty Ltd, Bradcorp, Governors Hill and Walker Corporation Pty Ltd. The extent of the Bradcorp site is shaded in green on Figure 1, on the following page.

The DP (2014) report provided a preliminary evaluation of the contamination status of the Wilton Junction site and its suitability, from a contamination standpoint, for the proposed rezoning. This addendum to the PCA has been prepared in response to comments provided by the NSW Environment Protection Authority (EPA) on the PCA for the Bradcorp portion of the site only (‘Bradcorp site’), see Section 2.
Figure 1: Wilton Junction Land Ownership
2. Response to EPA Comments

Table 1 below presents comments that were provided to Bradcorp, from the EPA with DP’s response specific to the Bradcorp site. Section 3 addresses the response to comments in greater detail.

Table 1: DP response to EPA Comments

<table>
<thead>
<tr>
<th>EPA Comment (Section 4)</th>
<th>DP Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Phase 1 Contamination Assessment (the report) presents a preliminary evaluation</td>
<td>Noted and agreed, the level of assessment completed was considered suitable for the rezoning application and is commensurate with the</td>
</tr>
<tr>
<td>of the contamination status of the site identifying Areas of Environmental Concern</td>
<td>information available at the Phase 1 (PSI) stage.</td>
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<tr>
<td>(AECs). The Phase 1 Contamination Assessment does not consider or address contaminated</td>
<td>DP Action: none proposed.</td>
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<tr>
<td>sites issues in fine detail.</td>
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<tr>
<td>The report does not include a Conceptual Site Model (CSM) which should be an integral</td>
<td>DP Action: A high level CSM is presented in this PCA Addendum.</td>
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<tr>
<td>part of a Phase 1 assessment. As described in the NEPM guidance (Schedule B (2) –</td>
<td></td>
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<tr>
<td>guideline on site Characterisation), development of a CSM is an essential part of all</td>
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<tr>
<td>site assessments and provides the framework for identifying how the site became</td>
<td></td>
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<tr>
<td>contaminated and how potential receptors may be exposed to contamination either in the</td>
<td></td>
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<tr>
<td>present or in the future. In accordance with the NEPM guidance, a CSM should be</td>
<td></td>
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<tr>
<td>developed so to establish the assessment objectives to inform further assessment.</td>
<td></td>
</tr>
<tr>
<td>The “Executive Summary” indicates “Based on the findings of this preliminary</td>
<td>DP intends to assess the need for a groundwater assessment on a case by case basis for each AEC. Based on the findings of the PCA, no</td>
</tr>
<tr>
<td>contamination assessment, potential groundwater contamination is not considered to</td>
<td>known significant issues exist within the Bradcorp area that would trigger the need for a groundwater assessment, unless significant</td>
</tr>
<tr>
<td>be significant unless soil contamination is found within the AEC within the background</td>
<td>contamination is identified at the Phase 2 or DSI stage.</td>
</tr>
<tr>
<td>area. If significant contamination is identified, then a groundwater investigation may</td>
<td>DP Action: None proposed.</td>
</tr>
<tr>
<td>be required.” Given that AECs have been identified in the report, further intrusive</td>
<td></td>
</tr>
<tr>
<td>investigations of contamination by way of both soil and groundwater assessment within</td>
<td></td>
</tr>
<tr>
<td>the AECs is warranted.</td>
<td></td>
</tr>
</tbody>
</table>
### EPA Comment (Section 4)

The “Section 7.4 Groundwater Bore Database” indicated the presence of eight (8) bores on site for domestic stock, irrigation and test purposes with depths between 12 to 76 metres depth. The site hydrogeology description is not included and therefore, the depth of the groundwater on site remains unknown. An assessment of site hydrogeology is warranted to inform a conceptual site model of the site and understanding of potential impacts of site contamination to human health and the environment.

The “Section 7.5, Search of the Department of Defence Website for Sites Affected by Unexploded Ordnance (UXO)" indicates “no further investigation of the UXO area within the site is considered necessary from a contamination stand point.” It is recommended an adequate assessment of UXO to be undertaken in the site. A site containing UXO represents a safety hazard and must be assessed by a qualified expert. The expert will be able to determine if the site is safe or has an appropriate level of site investigation in relation to UXO by identifying the presence of UXO or the likelihood of finding it in the site. It is also recommended that the area suspected to be used as a World War 2 bombing range (Lot 2 DP702024 – owned by Bradcorp) to be assessed to identify potential environmental impacts from the military past activity.

The “Section 8, Site Inspection”, page 15 of the report: Bullet 7, indicates that minor staining was observed around the bowser in the airfield
Bullet 8, indicates that staining around above ground storage tank (AST) was observed around the bowser in the airfield.

Consideration should be given to contaminated site assessment of airfield AST and associated infrastructure as well as soil and groundwater investigations in the airfield area. Irrigation/domestic bores may be present in vicinity of the site, so it will be critical to assess the potential impacts into water resources. Monitoring must be undertaken with reference to the NSW EPA approved guidelines including the 2013 Amendment of the Assessment of Site Contamination NEPM 1999.

### DP Response

Available bore logs and site history information can be further assessed to provide additional information on the hydrogeological regime of the general region.

DP Action: The additional information is provided in this PCA Addendum.

OPEC Systems has been engaged by Bradcorp to conduct a UXO Assessment of the Douglas Park Bombing Range (which encompasses the site). The OPEC Systems report has been reviewed by DP as part of this PCA Addendum.

This comment is not relevant to the Bradcorp area as the ASTs were located outside the boundary of this area.

DP Action: None proposed; a review of available groundwater information is however included in this report.
## EPA Comment (Section 4) | DP Response
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The Section “8. Site Inspection” page 15, bullet 12, indicates a landfill (which appears to be illegal) was observed on the northern side of the runway. It is considered that further assessment is required, including groundwater assessment, in order to identify soil and groundwater impacts from the landfill activities.

This comment is not relevant to the Bradcorp area as the landfill is outside the boundary of this area.

DP Action: None proposed; a review of available groundwater information is however included in this report.

Based on the findings of the Phase 1 Assessment, the cattle yard was not considered to be an Area of Environmental Concern.

To resolve this comment, DP proposes conducted a walkover of the cattle yard area, as well as targeted sampling and analysis for chemicals of potential concern associated with former agricultural land use in this portion of the site. The findings of these works are included in this PCA Addendum.

The presence of BHP Billiton exploration / monitoring locations observed on the ‘Governers Hill’ Land is likely associated with nearby coal mining (Bulli Seam Operations at West Cliff Colliery / Appin Area 9).

South32 (demerged from BHP Billiton) is contractually required to reinstate the site to baseline conditions, if and where required. This requirement will be triggered once rezoning approval is granted.

DP Action: Further information regarding BHP Billiton mining / monitoring activities in the region is provided in this PCA Addendum which also provides comment on any potential contamination sources (if any) associated with such activities.

The Section “9, Potential for Contamination” identifies in “Table 3” asbestos are identified as a contaminant of concern for a number of areas of environmental concern. It is recommended that future investigations engage a suitably qualified person for implementing asbestos management, if required.

DP confirms that suitably qualified and trained environmental staff are engaged to conduct asbestos specific investigations and remediation works. Training includes DP in-house asbestos competency training. DP is also able to provide licensed asbestos assessors for work associated with friable asbestos.

DP Action: None proposed.
EPA Comment (Section 4) | DP Response
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Considering that important contamination issues have been identified in the report, engagement of a site auditor accredited under the Contaminated Land Management Act 1997 is recommended to confirm that the site is suitable for the proposed use. | DP understands that Melissa Porter of Senversa has been engaged by Bradcorp to conduct an audit under the CLM Act 1997.

3. Response to Comments

DP has addressed the EPA’s comments regarding the CSM, hydrogeology, UXO, cattle yard and BHP Billiton activities in Sections 3.1 – 3.5 below.

3.1 Conceptual Site Model

A CSM is a representation of site-related information regarding contamination sources, receptors and exposure pathways between those sources and receptors (linkages). A preliminary CSM provides a framework to identify potential contamination sources and how potential receptors may be exposed to contamination either in the present or the future (i.e. it enables an assessment of the potential source – pathway – receptor linkages). The preliminary CSM is used to inform future contamination investigations (if required).

3.1.1 Potential Sources

Based on the review of site history information and the site inspection conducted as part of the PCA, the identified sources, description of sources and contaminants of potential concern (COPC) at the site have been summarised in Table 2, below. The locations of AEC for the Bradcorp site (only) are shown on Drawing 1, attached.

<table>
<thead>
<tr>
<th>Potential Source</th>
<th>AEC#</th>
<th>Description of Potential Source</th>
<th>COPC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mounds / Stockpile (S1)</td>
<td>36, 37, 43, 44, 45</td>
<td>During the site inspection, two soil mounds (of unknown origin) were observed within the northern portion of the site (AEC 43 and 44). Soil stockpiles (of unknown origin) were also observed within the southern region (AEC 36 and 37), and a earthen ramp / mound was noted within the south eastern portion of the site (AEC 45)</td>
<td>Metals, PAH, TRH, BTEX, OCP, OPP, PCB, asbestos</td>
</tr>
<tr>
<td>Fill (S2)</td>
<td>24</td>
<td>A possible filled gully was observed during the site inspection in the south eastern region of the site. Timber logs were observed on the surface.</td>
<td>Metals, PAH, TRH, BTEX, OCP, OPP, PCB, asbestos</td>
</tr>
</tbody>
</table>
### Potential Source

<table>
<thead>
<tr>
<th>Potential Source</th>
<th>AEC#</th>
<th>Description of Potential Source</th>
<th>COPC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction of Railway Bridge (S3)</td>
<td>1</td>
<td>Review of the 1984 historic aerial photograph indicates that a railway bridge was being constructed within the western portion of the site. Construction and demolition waste is likely to have been generated as a result of these works.</td>
<td>Metals, TRH, BTEX, PCB, PAH and asbestos</td>
</tr>
<tr>
<td>Ground Disturbance (S4)</td>
<td>2, 8, 11</td>
<td>Based on review of historical aerial photographs, the following ground disturbances were noted: 1955 aerial - AEC 11; 1961 aerial - AEC 2; 1984 aerial - AEC 8</td>
<td>Metals, PAH, TRH, BTEX, OCP, OPP, PCB, asbestos</td>
</tr>
</tbody>
</table>

**Notes:**
- Metals: comprising arsenic (As), cadmium (Cd), chromium (Cr), copper (Cu), lead (Pb), mercury (Hg), nickel (Ni) and zinc (Zn);
- TRH - Total recoverable hydrocarbons;
- BTEX - Benzene, toluene, ethylbenzene and xylene;
- PAH - Polycyclic aromatic hydrocarbons;
- OCP and OPP - Organochlorine and organophosphorous pesticides;
- PCB - Polychlorinated biphenyls;
- ACM - Asbestos Containing Material

### 3.1.2 Potential Receptors

The following potential human receptors (R) have been identified for the site:

- **R1** – Construction and maintenance workers (during site redevelopment);
- **R2** – Future site users following development of the site; and
- **R3** – Land users in adjacent areas (rural residential) including irrigation from Hawkesbury sandstone aquifer.

The following potential ecological receptors (R) have been identified for the site:

- **R4** – Local groundwater, and receiving water bodies;
- **R5** – Surface water bodies (creeks, dams); and
- **R6** – Local ecology. DP notes that potential ecological receptors are usually associated with the upper 2 m (root zone and habitation zone for many species) of the soil profile.

### 3.1.3 Potential Pathways

Potential pathways for contamination include the following:

- **P1** – Ingestion and dermal contact of soil and irrigation water;
3.1.4 Summary of Potential Complete Pathways

A ‘source – pathway – receptor’ approach has been used to assess the potential risks of harm being caused to human or ecological receptors from contamination sources on or in the vicinity of the site, via exposure pathways. The possible exposure pathways between the above sources (S1 – S6) and receptors (R1 to R6) are provided in Table 3 below. Assessment of the preliminary CSM was used to determine data gaps and the requirement for sampling and analysis to assess the suitability of the site for the proposed residential use.

Table 3: Preliminary Conceptual Site Model

<table>
<thead>
<tr>
<th>Source</th>
<th>Exposure Pathway</th>
<th>Receptor</th>
<th>Requirement for Additional Data and / or Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>S1: Mounds / Stockpiles</td>
<td>P1 – Ingestion and dermal contact.</td>
<td>R1 - Construction and maintenance workers.</td>
<td>An intrusive investigation is required to quantify and assess possible contamination including chemical testing of soil (surface water and groundwater if deemed necessary).</td>
</tr>
<tr>
<td>S2: Fill</td>
<td>P2 – Inhalation of fibres, dust and/or vapours</td>
<td>R2 – Future site users</td>
<td></td>
</tr>
<tr>
<td>S3: Construction and Demolition waste</td>
<td>P3 – Leaching of contaminants and vertical migration into groundwater.</td>
<td>R3 – Land users in adjacent areas.</td>
<td></td>
</tr>
<tr>
<td>S4: Ground Disturbance</td>
<td></td>
<td>R4 – Local groundwater and receiving water bodies.</td>
<td></td>
</tr>
<tr>
<td>S5: Agricultural Activities</td>
<td></td>
<td>R5 – Surface water bodies.</td>
<td></td>
</tr>
<tr>
<td>S6: BHP Billiton Activities</td>
<td>P4 – Surface water run-off.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>P5 – Lateral migration of groundwater providing baseflow to watercourses.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>P6 – Plant uptake.</td>
<td>R6 – Local ecology.</td>
<td></td>
</tr>
</tbody>
</table>
3.2 Hydrogeology

The Bradcorp site is underlain by both Ashfield Shale of the Wianamatta Group and Hawkesbury Sandstone. As such, the hydrogeology will vary depending on the location within the site. The following paragraphs provide a description of the expected conditions in both the shales and the sandstone.

McNally, G. 2005, *Investigation of Urban Salinity – Case Studies from Western Sydney*, 2005 describes some general features of the hydrogeology of Western Sydney which are relevant to the Bradcorp site. The shale terrain of much of Western Sydney is known for saline groundwater, resulting either from the release of connate salt in shales of marine origin or from the accumulation of windblown sea salt. Seasonal groundwater level changes of 1 m – 2 m can occur in a shallow regolith aquifer or a deeper shale aquifer due to natural influences.

Groundwater investigations undertaken by DP in the South West of Sydney and previous studies of areas underlain by the Wianamatta Group, including Wilton indicate that:

- The shales have a very low intrinsic permeability, hence groundwater flow is likely to be dominated by fracture flow with resultant low yields (typically < 1 L/s and as low as 0.03 L/s in Wilton) in bores. Groundwater depth in the Wilton area is typically in the range of at least 50 m below the ground surface;

- The groundwater in the Wianamatta Group is typically brackish to saline with total dissolved solids (TDS) in the range 4000 – 5000 mg/L (but with cases of TDS up to 31 750 mg/L being reported\(^1\)). The dominant ions are typically sodium and chloride and the water is generally unsuitable for livestock or irrigation; and

- The Hawkesbury Sandstone is generally associated with low salinity levels, however the typically low to very low yield of groundwater from the sandstone means extraction of groundwater for irrigation purposes is typically impractical.

The areas underlain by Hawkesbury Sandstone are typically associated with higher groundwater quality (i.e. low salinities) and higher yields. Based on available groundwater bore logs and previous investigations in the Wilton area, sandstone and shale in places is present at shallow depths (< 10 m) below the Wilton area; the older Hawkesbury sandstone is more commonly exposed in low lying areas, i.e. toward the north east and north west (toward the Nepean River). The Hawkesbury sandstone beneath the Wilton area is generally unconfined and likely to be in direct hydraulic continuity with the soil landscape, therefore it is not considered to be suitable for potable water purposes.

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3.3 OPEC Systems UXO Assessment

OPEC Systems Pty Ltd (OPEC) was engaged by Bradcorp to conduct an Unexploded Ordnance Assessment for the site as reported in their report titled Douglas Park Bombing Range, Unexploded Ordnance Assessment, Reference 17339DHN, dated 20 June 2017 (OPEC, 2017). OPEC reported that the Douglas Park Bombing Range operated by the Australian Military Forces was located at the site, including three aircraft Emergency Landing Grounds (ELG). The bombing range was reported by OPEC to be located at the site between February 1943 and at least January 1944. OPEC reported a search of the area for unexploded ammunition was ordered as part of the range closure; records indicated that no munitions, high explosive or practice were air delivered onto the range. OPEC concludes “it is considered that there is no potential for remnant air delivered munitions to be found in the Wilton Junction and Wilton North West development area”. A copy of the OPEC report is attached.

3.4 Cattle Yard

3.4.1 Site Walkover

A site walkover was undertaken on 13 June 2017 by a DP environmental scientist. Five surface samples (S1 to S5) were collected from the cattle yard area to provide general site coverage. One of the samples (S5) targeted an observed ground disturbance, based on review of aerial photographs. The surface sample locations are shown on Drawing 2, attached.

Photographs taken during the walkover are presented in Photographic Plates 1 to 3, attached. During the walkover, the following observations were made:

- The cattle yard consisted of a fenced area (Photograph 1) surrounded by vacant agricultural land (Photograph 2);
- There was an Intermediate Bulk Container (IBC) immediately south of the site (Photograph 1). No evidence of spillages were observed on or around the IBC;
- Two plastic basins filled with liquid (no odour was observed; assumed to be water) were found within the cattle yard (Photograph 3);
- Metal stakes and sheeting were found scattered within the northern portion of the cattle yard (Photograph 4); and
- Immediately north of the cattle yard, there was an area stripped of vegetation, with exposed soil (Photograph 5 – observed ground disturbance in historical aerial).

3.4.2 Field Sampling Procedure

Sampling data were recorded to comply with routine chain – of – custody requirements and DP’s standard operating procedures. The general sampling, handling, transport and tracking procedures are detailed below:

- Sample locations were pre-determined using GIS prior to field work and were located in the field using a handheld Garmin GPS;
Samples were collected from the ground surface using disposable nitrile gloves and hand tools. Samples were collected from soils that did not come into contact with the hand tools. Gloves were replaced prior to the collection of each sample. Samples were placed into laboratory prepared glass jars. In addition, 50 g bag samples were collected for asbestos testing;

- Sample containers were labelled with individual and unique identification including project number, sample ID, depth and date of sampling; and
- One QA/QC sample was collected.

### 3.4.3 Analytical Rationale

Laboratory analysis of primary and intra-laboratory samples was conducted by Envirolab Services Pty Ltd (Envirolab). Envirolab is accredited by the National Association of Testing Authorities (NATA) and are required to conduct in – house QA / QC procedures. These are normally incorporated into every analytical run and include assessment of reagent blanks, spike recovery, surrogate recovery and laboratory duplicates.

The analytical methods used are summarised in the laboratory certificates of analysis, attached.

### 3.4.4 Site Assessment Criteria

The site assessment criteria (SAC) applied have been informed by the CSM - which identified potential linkage of human and environmental receptors to potential contamination on the site (refer to Section 3.1). Analytical results were assessed (as a Tier 1 assessment) against the investigation and screening levels as per Schedule B1 of NEPC (2013).

Taking into account the proposed land use of the site, the investigation and screening levels adopted are consistent with a residential land use scenario.

### 3.4.5 Analytical Results

The analytical results for the soil samples collected during the investigation are summarised in the attached Summary Table of Laboratory Results, together with the adopted SAC. Laboratory certificate of analysis has also been attached.

A summary of the results is provided below:

- Concentrations of PAH, Phenols, BTEX, OCP, OPP and PCB were below the laboratory limit of reporting (LOR);
- Concentrations of metals and TRH were below the LOR and or SAC; and
- Asbestos was not detected in any of the soil samples submitted for analysis.
3.5 BHP Billiton Activities

Further information regarding the BHP Billiton activities was obtained via phone and email correspondence with a community officer from South 32, a resource company that was previously part of BHP Billiton (BHP), who operate coal mining in the Bulli and Appin areas.

The nearest current underground mine (Longwall type) at the site is located approximately 1 km north of the Bradcorp site, near Douglas Park. As discussed in the PCA, four BHP exploration / monitoring bores are located within the Bradcorp site (as shown on Drawing 1, attached)

Four BHP bores were installed by BHP at the site in 2005 for the purposes of monitoring groundwater levels (only) as part of their mine dewatering program. The groundwater levels are frequently monitored using in-bore data loggers. The bores were installed using a truck mounted drill rig; groundwater bores were subsequently installed and appropriately sealed above the bore slots. All spoil and water was taken off site by BHP and disposed of appropriately (as reported by South 32/BHP).

Based on correspondence received from South 32, mine water irrigation has historically occurred in the general Wilton area, however DP understands this has not occurred on the site, nor has any irrigation occurred in the general Wilton area for a number of years.

4. Conclusions

The PCA prepared by DP provided a preliminary evaluation of the contamination status of the site and its suitability, from a contamination standpoint for the proposed residential rezoning. The purpose of this addendum to the PCA is to respond to comments provided by the EPA, specific to the Bradcorp site only.

Based on the findings of the PCA and this addendum, it is considered that the potential for significant contamination at the site is low, however, further investigation is recommended for the AECs defined in Table 2 of this report. In addition, low density (grid based) sampling of the remainder of the Bradcorp property is recommended to confirm the contamination status of the site. The additional investigation works should be undertaken prior to any development applications for subdivision and/or commencement of bulk earthworks.

Based on the findings of the PCA and this addendum, the potential for groundwater contamination is not considered to be significant unless soil contamination is identified during further investigation works as part of the Phase 2 or DSI. If significant contamination is identified, then a groundwater investigation will be required.

It is considered that the site is suitable for rezoning for the proposed Wilton Junction development from a contamination perspective. Further investigation, as described above, and remediation, as required, should be undertaken prior to subdivision.
5. Limitations

Douglas Partners Pty Ltd (DP) has prepared this report for this project at Hume Highway and Picton Road, Wilton NSW in accordance with DP’s proposal MAC170141 dated 17 May 2017. The work was carried out under DP’s Conditions of Engagement. This report is provided for the exclusive use of Bradcorp Holdings Pty Ltd for this project only and for the purposes as described in the report. It should not be used by or relied upon for other projects or purposes on the same or other site or by a third party. Any party so relying upon this report beyond its exclusive use and purpose as stated above, and without the express written consent of DP, does so entirely at its own risk and without recourse to DP for any loss or damage. In preparing this report DP has necessarily relied upon information provided by the client and / or their agents.

The results provided in the report are indicative of the sub-surface conditions on the site only at the specific sampling and / or testing locations, and then only to the depths investigated and at the time the work was carried out. Sub-surface conditions can change abruptly due to variable geological processes and also as a result of human influences. Such changes may occur after DP’s field testing has been completed.

DP’s advice is based upon the conditions encountered during the investigation. The accuracy of the advice provided by DP in this report may be affected by undetected variations in ground conditions across the site between and beyond the sampling and/or testing locations. The advice may also be limited by budget constraints imposed by others or by site accessibility.

This report must be read in conjunction with all of the attached as well as DP’s PCA report and should be kept in its entirety without separation of individual pages or sections. DP cannot be held responsible for interpretations or conclusions made by others unless they are supported by an expressed statement, interpretation, outcome or conclusion stated in this report.

Yours faithfully,

Douglas Partners Pty Ltd

Chamali Nagodavithane
Environmental Scientist

Attachments: Drawing 1 and 2
Photographic Plate
Photo 1 - Cattle Yard

Photo 2 - Surrounding agricultural land
Photo 3 - Area within cattle yard

Photo 4 - Metals stakes and sheeting within northern portion of cattle yard
Photo 5 - Area of exposed soil, north of cattle yard