

475 Badgerys Creek Road, Bradfield

Remedial Action Plan

Prepared for:
SBA Architects Pty Ltd

Document Number:
26008955-001-R2-Rev1-RAP Bradfield 260421

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Geosyntec 
consultants

Quality Management

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Revision	Details	Prepared by	Reviewed by	Date
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I Andrew Schmidt confirm this Remediation Action Plan addresses the SEARs requirement of Land Contamination and relevant State and local legislation, policies, and guidelines including Managing Land Contamination Planning Guidelines: SEPP 55 – Remediation of Land (DUAP, 1998). I further confirm that none of the information contained in the Remediation Action Plan is false or misleading.



SEARs Item	Report Reference
A site contamination assessment in accordance with the Managing Land Contamination Planning Guidelines: SEPP 55 – Remediation of Land (DUAP, 1998), or justification for reliance upon previous investigations prepared for the site, including: - characterisation of the nature and extent of any contamination on the site and surrounding area - a Detailed Site Investigation (DSI) and a Remedial Action Plan, if the Preliminary Site Investigation indicates contamination is present, and a DSI is required.	Executive Summary

Geosyntec Consultants Pty Ltd

ABN: 23 154 745 525

www.geosyntec.com.au

Executive Summary

This Remediation Action Plan has been prepared by Geosyntec Consultants Pty Ltd to accompany a State Significant Development Application (SSDA) for the construction of a warehouse or distribution facility (as defined), referred to throughout this report as an automated distribution facility (ADC).

The land to which this report relates is referred to as 475 Badgerys Creek Road, Bradfield, which has direct interface with the Western Sydney International Airport (WSI), legally described as part Lot 102 and Lot 105 in DP 1316278. It is noted that the ADC will be located on future lots within the 475 Badgerys Creek Road landholding. For the purpose of this Report, reference to 'the site' will relate primarily to the area within the broader lot proposed to be developed for the ADC, as shown in red in Figure 1, unless otherwise specified.

This RAP has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-105499958), in accordance with the National Environmental Protection (Assessment of Site Contamination) Measure (2013) (NEPM 2013) and NSW EPA (2020) Consultants Reporting on Contaminated Land guidelines.

Previous investigations identified asbestos on the ground surface (Frag2/TP104) and in the soil (TP101) exceeding the human health screening levels for commercial/industrial land uses requiring remediation (Geosyntec, 2026).

This RAP provides the strategy for asbestos remediation to render the site suitable for the proposed industrial land use.

The preferred options selected for the remediation is:

- On-site treatment of surface fragments by hand picking; and
- Removal of contaminated soil material to an approved site or facility.

The subsequently exposed excavation surfaces will be subject to validation sampling and, if required, the reinstatement of the area using clean fill.

Following completion of remediation works, a validation report will be prepared to confirm that the remedial objectives have been met and that the site has been made suitable for the proposed industrial land use, consistent with the requirements of Section 4.6 of the State Environmental Planning Policy (Resilience and Hazards) 2021.

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1. Introduction

1.1 Background

Geosyntec Consultants Pty Ltd (Geosyntec) was commissioned by SBA Architects Pty Ltd (SBA) to prepare a Remediation Action Plan (RAP) for 475 Badgerys Creek Road, Bradfield, NSW (the site) to address identified contamination requiring remediation.

The broader landholding has an area of approximately 184 hectares (ha) and is subject to an approved Master Plan prepared by Inghams Property Group (IPG) (the master site). The proposed ADC will be located in Stage 2 of the master site. The site is legally identified as part of Lot 102 and Lot 105 in Deposited Plan (DP) 1316278 and forms part of the master site area, shown in Attachment A, Figure 1. The site occupies an approximate area of 17.2 ha.

Geosyntec had previously completed a Targeted Site Investigation (TSI) (2026), which identified asbestos contamination in soil adjacent to the former sediment ponds located at the southern portion of the site. This RAP has been prepared to address the TSI findings and to support the State Significant Development Application (SSDA) SSD-105499958 for the construction of a warehouse or distribution facility at the site by an e-retailer (the proponent).

It is understood that bulk earthworks under the approved IPG Master Plan have occurred, or are planned to occur, across the broader master site, including the site, outside of this SSDA process. The requirements of this RAP apply specifically to the defined site boundary as documented in the TSI (Geosyntec, 2026) and may be relied upon as a supplementary technical document to support broader planning requirements, including management of contamination under IPG Master Plan processes and unexpected finds protocols.

This RAP has been developed in accordance with the National Environmental Protection (Assessment of Site Contamination) Measure (2013) (NEPM 2013) and NSW EPA (2020) *Consultants Reporting on Contaminated Land guidelines*, to address the Secretary's Environmental Assessment Requirements (SEARs) dated 02 March 2026, specifically in relation to the requirement outlined in Table 1-1 below.

Table 1-1: SEARs Requirements

Item	Description of requirement
Land Contamination	A site contamination assessment in accordance with the Managing Land Contamination Planning Guidelines: SEPP 55 – Remediation of Land (DUAP, 1998), or justification for reliance upon previous investigations prepared for the site, including: - characterisation of the nature and extent of any contamination on the site and surrounding area - a Detailed Site Investigation (DSI) and a Remedial Action Plan, if the Preliminary Site Investigation indicates contamination is present, and a DSI is required.

1.2 Proposed Development

The proponent, an e-retailer, intends to construct and operate a new automated distribution facility (ADC). The proposed ADC will function as a distribution centre for goods storage and distribution direct to offsite third-party sortation service providers.

The proposed development is described as follows:

"Construction, fit-out and operation of a warehouse or distribution facility (automated distribution centre) with associated car parking, landscaping, driveway accesses, utility service connection, minor earthworks and other related works".

1.3 Objectives

The objective of this RAP is to:

- Outline a remedial strategy that will address the identified contamination; and
- Provide a validation plan that will ensure the site can be made suitable for the proposed industrial land use.

1.4 Scope of Work

To achieve the objectives of the RAP, the following items are covered:

- Summarise the current contamination status of the site.
- Discuss remediation options and reasons for the selection for the preferred strategy.
- Provide a detailed description of the preferred remediation strategy.
- Develop a sampling strategy for the validation program.
- Establish remediation criteria and a validation plan for the site.
- Document regulatory requirements for the remediation works.
- Document validation procedures to confirm that the site is suitable for the continued land use.

1.5 Guidelines, Legislation, Plans and Policies

The following Acts, Regulations and guidelines have been considered during the preparation of this RAP:

- DUAP & EPA (1998) Managing Land Contamination Planning Guidelines, SEPP 55 – Remediation of Land
- NEPM (2013) National Environment Protection (Assessment of Site Contamination) Measure, Schedule A and Schedules B(1)-B(9). National Environment Protection Council, Adelaide
- NSW EPA (2014) Managing asbestos in or on soil
- NSW EPA (2014) Waste Classification Guidelines: Part A – Classifying Waste.
- NSW EPA (2020) Consultants reporting on contaminated land: Contaminated Land Guidelines
- NSW EPA (2022) Contaminated Sites: Sampling Design Guidelines.
- NSW Government (2022) Aerotropolis Precinct Plan; Western Sydney Aerotropolis DCP
- NSW Government (2023) State Environmental Planning Policy (Resilience and Hazards) 2021
- NSW Government (2025) Contaminated Land Management Act 1997
- NSW Government (2025) Protection of the Environment Operations Act 1997.
- NSW Government (2025) Work Health and Safety Regulation 2025.

- NSW Government (2026) Environmental Planning Policy (Precincts – Western Parkland City) 2021
- NSW Government (2026) Work Health and Safety Act (2011) and Regulations (2017).
- Safework NSW (2022) Code of practice, How to manage and control asbestos in the workplace
- WADOH (2021) Guidelines for the assessment, remediation and management of asbestos contaminated sites

1.6 Key Stakeholders

The following stakeholders are expected to be involved in the implementation of this RAP:

Table 1-2: Roles and Organisation

Role	Organisation
Current Site Occupier	Vacant
Site Owner	Ingham Property Group (IPG)
Regulator	Department of Planning, Housing and Infrastructure
Project Manager	TBD
Remediation Contractor	TBD
Environmental Consultant	Geosyntec Consultants Pty Ltd

2. Site Identification and Conditions

2.1 Site Description

The land to which this report relates is referred to as 475 Badgerys Creek Road, Bradfield, which has direct interface with the Western Sydney International Airport (WSI). It is noted that the ADC will be located on proposed Lots 208, 209 and 210 within the broader 475 Badgerys Creek Road, Bradfield landholding. These lots are not yet formally registered.

The master site has an area of approximately 184 hectares and is subject to an approved Master Plan prepared by Inghams Property Group (IPG). The proposed ADC will be located in Stage 2 of the IPG master plan site. The application site has an area of approximately 172,000m². The location of the application site is presented in Figures 1 and 2.

The master site was formerly used for intensive poultry farming and previously contained a series of sheds and ancillary structures and an associated internal road network, which have now been demolished. Earthworks and other site establishment works have commenced across the master site.

Additional Site information is in Table 2-1 below.

Table 2-1: Site Identification

Item	Details	Source
Site Description:	The Site is currently vacant land. The Site location and layout are shown in Figures 1 and 2	Site Inspection Near Map Google Website
Current Use:	Vacant	Site Inspection
Geographical Coordinates (GDA2020 – MGA56):	Approximate centre of the Site: Easting: 291183 Northing: 6246439	SIX Maps
Local Government Area:	Liverpool City Council	SIX Maps
Zoning – Existing:	ENT – Enterprise.	NSW Planning Portal Spatial Viewer

2.2 Surrounding Land Use

The land use immediately adjoining the Site is shown in Figure 2. Information on surrounding land use was obtained from Nearmap Australia Pty Ltd (Nearmap) and historic reports. The Site surrounds are described in Table 2-2.

Table 2-2: Surrounding Land Use

Direction	Details
North	ENT - Enterprise to the adjoining north, then ENZ - Environment and Recreation surrounding the Badgerys Creek and followed by SP2 – Infrastructure to the further north and northwest. North of the Site is observed to be vacant land used for grazing. PGH Bricks quarry is located northeast of the Site, and Western Sydney Airport is located further northwest of the Site.
East	ENT - Enterprise.

	Vacant land for grazing of cattle (owned by Ingham Property Group). Previous land use is poultry breeder farm. South Creek is located further east, followed by a mixture of agricultural land and rural residential properties.
South	ENT - Enterprise. Cut and fill earthworks occurring for the development of an Aldi distribution centre.
West	ENT - Enterprise. Vacant land (owned by Ingham Property Group) followed by Badgerys Creek Road. Elford Group quarry is located west of Badgerys Creek Road.

2.3 Geology, Hydrogeology, and Hydrology

The site's geology, hydrogeology and hydrology are summarised in Table 2-3.

Table 2-3: Geology, Hydrogeology and Hydrogeology

Item	Details	Source
Topography and Drainage:	The Site is located at an elevation of between 62-74 metres Australian Height Datum (m AHD). The Site has a high point ridge at the southeastern portion, resulting in the majority of the Site sloping downwards to the west, north, and northeast. Given the Site's topographical setting and vegetative surface, surface water is expected to infiltrate. Overland flow is likely towards the creeks located to the west and east (Western Riparian Creek and Central Riparian Creek, Figure 2), then discharges northward to Badgerys Creek, located to the north of the Site. Surface water from overland drainage is also captured by the drained sediment ponds located southeast of the Site.	TSI Geosyntec (2026)
Geology Map Conditions:	Based on a desktop review of the obtained geological information, the Site is underlain by Bringelly Shale of the Wianamatta Group, typically characterised as shale, carbonaceous claystone, laminite, lithic sandstone, and rare coal.	TSI Geosyntec (2026)
Soil Map Conditions:	The Site is underlain by Kurosol. Natural soils within the Site are typically characterised as hard acidic red soils with hard neutral and acidic yellow mottled soils.	TSI Geosyntec (2026)
Acid Sulfate Soils:	The Site is situated within an area of extremely low probability of occurrence, 1-5% chance of occurrence, with occurrences in small, localised areas, according to The Atlas of Australian Acid Sulfate Soils (ASS).	TSI Geosyntec (2026)
Salinity:	The Site is located within a moderate to high salinity area.	TSI Geosyntec (2026)
Location of Fill Materials:	A large stockpile approximately 120 m long, 10 m wide and 2 m high is located in the central portion of the Site, south of the former poultry farm footprint. This stockpile is reported to be associated with the former farms. Stockpile material was assessed and deemed suitable for onsite reuse (Senversa, 2024). Fill materials may have been used during the development of the former poultry farms and farmsteads.	TSI Geosyntec (2026)
Summary of Registered Groundwater Bores within 1.0 km: radius	There are 10 groundwater bores registered within a 2 km radius of the Site. The purposes of these wells include monitoring, commercial and industrial. The wells range in depth from 23.93 to 32.98 m. In addition, 12 groundwater monitoring wells were installed within the Ingham Estate property, as part of DSI (Senversa, 2024). None of the 12 groundwater monitoring wells was located within the Site. The wells are located within a 2 km radius of the Site.	TSI Geosyntec (2026)
Use of Water Abstraction	Water abstraction is not apparent at or within 2 km of the Site.	TSI Geosyntec (2026)

Item	Details	Source
within a 2.0 km radius of Site:		
Depth to Groundwater:	There are 2 groundwater bores within a 1 km radius that have reported standing water levels (SWLs) of 6.8 and 8.5 metres below ground level (mbgl), located at 130 m and 281 m to the west of the Site, respectively. The 12 groundwater bores installed as part of the DSI (Senversa, 2024) reported SWL ranging from 1.7 to 8.65 metres below top of casing (m bTOC).	TSI Geosyntec (2026)
Anticipated Direction and Rate of Groundwater Flow:	Based on local topography and hydrology, the regional groundwater is expected to flow in a northerly direction toward Badgerys Creek, located approximately 150 m north of the Site. The rate of flow has not been ascertained as part of the PSI and remained unconfirmed in this investigation.	TSI Geosyntec (2026)
Nearest Water Body:	Badgerys Creek is located approximately 150 m north of the Site and flows in a northerly direction. It is reported not to be used recreationally. South Creek is located approximately 1.2 km east of the Site, and flows in a northerly direction. There are some drainage channels on the parent property, which the IPG representative has identified as the Central Riparian Creek and Western Riparian Creek. These drainage channels are ephemeral and are situated outside the Site boundary, approximately 75 m to the east, and 160 m to the west, respectively.	TSI Geosyntec (2026)
Direction of Surface Water Run Off:	The Site has a high point at the southeastern portion and slopes downward towards the western and central portions of the Site. Overland flow is likely towards the riparian creeks located to the west and east, then discharges to Badgerys Creek to the north of the Site. Surface water from overland drainage was also captured by sediment ponds located southeast of the Site.	TSI Geosyntec (2026)
Preferential Water Courses:	No formal stormwater network was observed onsite. Surface water runoff is expected to infiltrate into the grassy surface. Overland flow is likely towards the riparian creek to the west of the site.	TSI Geosyntec (2026)
Background Water Quality:	The local groundwater borehole data did not contain background water quality information. Senversa conducted groundwater sampling in 2021 at targeted locations adjacent to the Site following remediation works. Concentrations of select heavy metals in groundwater (chromium, copper, nickel and zinc) exceeded ecological criteria, with nickel concentrations above the drinking water criteria. In addition, formaldehyde concentrations also exceeded the Drinking Water Guideline (DWG) in 2 of the monitoring wells. Wells are located outside the site boundary but within the parent property.	TSI Geosyntec (2026)

3. Site History

The following reports document the previous investigations on the master site:

- Senversa (2020) – Preliminary Site Investigation, 475 Badgerys Creek Road, Badgerys Creek, NSW, Report Ref: S17514_003_RPT_Rev1_Badgerys Creek_PSI, dated 30 October 2020;
- Senversa (2023) – Asbestos Management Plan, 475 Badgerys Creek Road, Badgerys Creek NSW, Report Ref: S20891_002_RPT_AMP_Rev2, dated 09 November 2023;
- Senversa (2024) – Badgerys Creek Environmental Report, 475 Badgerys Creek Road, Badgerys Creek NSW, Report Ref: S17514_018_EnvRep_Rev4, dated 17 June 2024; and
- Senversa (2025) – Targeted Soil Assessment – Former Sediment Ponds, 475 Badgerys Creek Rd, Bradfield NSW, Report Ref: S20891_025_LTR_Rev0, dated 31 July 2025;

The following reports document the previous investigations on the site:

- Geosyntec (2025) – Preliminary Site Investigation, 475 Badgerys Creek Road, Bradfield, NSW 2556 AU123057-020 SYDx Bradfield NSW, dated 15 August 2025; and
- Geosyntec (2026) – Targeted Site Investigation, 475 Badgerys Creek Road, Bradfield, NSW, Report ref: 26008955-001-R1-Rev1 Bradfield 260421, dated 21 April 2026

Based on the above reports, the master site has been remediated and was deemed suitable for commercial/industrial site use. Potential for residual asbestos was noted in the environmental report (Senversa, 2024), and an Asbestos Management Plan (AMP) was prepared for the master site, including an Unexpected Find Protocol (UFP) outlining the procedures should asbestos be identified during development works.

Bulk earthworks under the IPG Master Plan are planned to occur across the master site, including on the site, outside of the current SSDA process.

One large stockpile is present on the site, which has been remediated and is considered suitable for on-site re-use. No building structures remain on the site.

The Targeted Soil Assessment (TSA) in the former sediment pond area visually identified bonded asbestos piping at the surface of TP08 and from 0-0.2m depth at TP09 (Senversa, 2025). These locations are not located on the site but are approximately 15m from the southern site boundary.

The TSI (Geosyntec, 2026) identified asbestos in soil at TP101 down to natural soils approximately 0.8m below ground level. A surface fragment, Frag2, was confirmed to contain asbestos; however, the test pit TP104 performed immediately under Frag2 did not encounter any asbestos in the soil.

Field screening for bonded asbestos ion TP101 identified the bonded concentration to be 0.14 %w/w, exceeding the adopted human screening level of 0.05 %w/w. Figures and tables from the TSI (Geosyntec, 2026) is presented in Appendix A.

As such, the soil at TP101 and the surface at Frag2/TP104 require remediation.

4. Conceptual Site Model

Based on the TSI (Geosyntec, 2026), the conceptual site model is shown in Table 4-1.

Table 4-1: Conceptual Site Model

Activity & Potential Contaminants	Potentially Affected Media	Potential Human and Ecological Receptors	Potential Exposure Pathways
Historic filling (Asbestos)	Soil on the western embankment of the sediment pond area	- Current site users and visitors. - Future site users, site construction and maintenance workers, and occupants/visitors.	Inhalation of airborne contaminants from the materials.

5. Data Gaps

The exact extent of the asbestos impacts has not been delineated; however, this will be addressed during the validation phase of the remediation works.

Similarly, a waste classification has not been completed for the impacted material; however, this will be completed during the remediation works.

As such, no data gaps are present, preventing the remedial works.

6. Remedial Action Plan

The remedial action plan below is developed in accordance with the NSW EPA (2020) Consultants Reporting on Contaminated Land - Contaminated Land Guidelines.

6.1 Remediation Goal

The remediation goal for the site is to remediate the identified asbestos impacts to render the site suitable for the proposed industrial land use.

6.2 Remediation Acceptance Criteria

6.2.1 Site Soils

Soil analytical results will be assessed against the guidelines listed below, with the adopted soil criteria summarised in Table 6-1:

- NEPM (2013) Health Screening Levels: HSL D – Commercial/Industrial use taken from Table 7. The HSLs apply to Bonded ACM, Friable asbestos (FA) and asbestos fines (AF).

Table 6-1: Assessment Criteria

Form of Asbestos	Health Screening Level (w/w)
Bonded ACM	0.05%
FA and AF	0.001%
All forms of asbestos	No visible asbestos in surface soil

6.2.2 Waste Classification and Offsite Disposal

For surplus soil material or soil material requiring offsite removal, waste classification will be conducted in accordance with:

- NSW EPA (2014b) Waste Classification Guidelines: Part 1: Classifying Waste

6.2.3 Imported Material

If required, imported soils must comprise Virgin Excavated Natural Material (VENM), meeting the definition of VENM in accordance with the NSW Protection of the Environment Operations Act (POEO) 1997 and waste classification guidelines. ENM must meet the criteria presented in the Excavated Natural Material Order 2014.

Imported soil for landscaping purposes must meet the NEPM (2013) ecological investigation (EIL) / screening (ESL) levels or Resource Recovery Exemptions made by the NSW EPA. Documentation must be obtained from the supplier to demonstrate that the material is VENM or meets the requirements of the Resource Recovery Exemption and is suitable for use as a growing medium.

Other imported material should meet site criteria (Section 6.2.1) and/or criteria in accordance with NSW EPA resource recovery exemptions. Imported engineered fill (e.g. subgrade) must comprise suitable quarried materials. Given the potential for asbestos to be present, it is recommended that recycled aggregate not be imported to the site.

6.3 Extent of Remediation Required

The approximate extent of remediation has been estimated and is summarised in Table 6-2 below, and is presented in Figure 2. The defined remediation areas are based on 10 m x 10 m buffers surrounding the locations of the identified asbestos impacts.

No asbestos was identified within TP104, which was undertaken immediately adjacent to the Frag2 sample. As such, remediation is limited to the surface soils surrounding the Frag2/TP104 location. Asbestos was identified at depth within TP101, extending to the top of natural soils (approximately 0.8 m below ground level), and remediation is therefore required to this depth.

Table 6-2: Extent of Remediation Required

Remediation Area	Contaminant	Impacted Area	Impacted Depth	Approximate Volume
TP101	Asbestos (bonded)	100m ²	0.8m	80m ³
Frag2	Asbestos (bonded)	100m ²	Surface	-

6.4 Remediation Options Assessment

The NEPM (2013) provides the preferred hierarchy of options for site clean-up and/or management, which is outlined as follows:

- onsite treatment of the contamination, so that it is destroyed or the associated risk is reduced to an acceptable level; and
- offsite treatment, so that the contamination is destroyed or the associated risk is reduced to an acceptable level, after which the soil is returned to the site; or,

if the above are not practicable,

- consolidation and isolation of the soil onsite by containment with a properly designed barrier; and
- removal of contaminated material to an approved site or facility, followed, where necessary, by replacement with appropriate material;

or,

- where the assessment indicates remediation would have no net environmental benefit or would have a net adverse environmental effect, implementation of an appropriate management strategy should be adopted.

Geosyntec's assessment of the remediation options provided in the NEPM (2013) is provided in Table 6-3.

Table 6-3: Remedial Option Assessment

Option	Assessment
Onsite treatment	This method is considered suitable for ACM fragments on the soil surface (Frag2), however, it is not applicable for asbestos impacts in soil (TP101).
Offsite treatment, followed by onsite reuse	This option is not considered feasible as offsite treatment and re-use of asbestos-contaminated material is not permitted in NSW.
Consolidation and isolation of soil by containment	This option is considered appropriate; however, it will require the implementation of a Long Term Environmental Management Plan and would potentially affect the proposed earthworks plan. Given the relatively minor volume of impacted soil, while viable, it is not considered the preferred remediation method.
Removal of contaminated material to an approved site or facility	This option is considered appropriate and represents a cost-effective and time-efficient remediation approach.
Implementation of an appropriate management strategy	This option is not considered appropriate as this will potentially require the implementation of a Long Term Environmental Management Plan and would constrain earthworks, thereby impacting the proposed development. Given the relatively minor volume of impacted materials, this option is neither ideal nor preferred.

Based on the assessment in Table 6-3, the preferred remediation options were identified as:

- On-site treatment of surface fragments by hand picking; and
- Removal of contaminated soil material to an approved site or facility.

6.5 Remedial Works Strategy

The Remedial Works Strategy consists of the following stages:

- Stage 1: Preliminaries and Site Management
- Stage 2: Remedial Excavation, Waste Classification and Offsite Disposal
- Stage 3: Validation
- Stage 4: Fill Importation and Site Restoration – *if required*

If required, and where practicable and appropriate, stages can be completed simultaneously or out of sequence.

6.5.1 Stage 1: Preliminaries and Site Management

The Remediation Contractor will be responsible for site management during remediation works, in accordance with their contractual arrangements with the Client.

6.5.1.1 Health and Safety Plans

The Remediation Contractor shall prepare a site-specific occupational health and safety plan for the proposed work. The occupational health and safety plan shall include safe work method statements for each activity at the site.

Contractors engaged by the Remediation Contractor shall also prepare relevant safe work method statements for the work undertaken at the site.

6.5.1.2 Construction Environmental Management Plan

A Framework Construction Environmental Management Plan (CEMP) (SLR, 2024) has been prepared for the greater IPG site.

Prior to commencing construction, a site-specific CEMP should be prepared using the Framework CEMP and should also include, but is not limited to:

- Soil management
- Stockpile management
- Management of asbestos-related works
- Material tracking
- Stormwater management
- Dust control
- Air monitoring
- Noise management
- Odour management
- Waste management
- Incident response
- Licences and approvals
- Contact personnel

6.5.1.3 Asbestos Management Plan

Asbestos works must be managed as per the master site's Asbestos Management Plan (Senversa, 2024).

Before the commencement of works, a site-specific asbestos management plan should be prepared.

6.5.1.4 Underground Services

Prior to remediation works, a Before You Dig Australia (BYDA) search will be performed to confirm if any services are present within the proximity of the remediation area.

If available, the site owner will provide any 'as-built' drawings of underground services for the property to the remediation contractor.

6.5.1.5 SafeWork Notification

Appropriate notification to SafeWork NSW should be performed by the Asbestos removalist prior to the removal of asbestos

6.5.2 Stage 2: Remedial Excavation, Waste Classification and Offsite Disposal

The remedial area is defined in Section 6.3 and shown in Figure 2.

6.5.2.1 Asbestos-impacted soil at TP101

Soil from the area surrounding TP101 will be excavated to a minimum extent of a 10m x 10m area down to natural soils (approximately 0.8 m below ground level).

If stockpiled, the remedial stockpile will be:

- Placed on a sealed surface or builders' plastic to prevent cross-contamination. If the stockpiled material is placed directly on exposed soils, validation samples will be required on the stockpile footprint at a rate of one sample per 25 m²;
- Sampled by an Environmental Consultant for waste classification for offsite disposal as outlined in Section 6.5.2.2; and
- Disposed of at a waste facility licensed to accept the waste classification specified in the Waste Classification Certificate (i.e. Special Waste).

Alternatively, the impacted soil can be excavated directly into trucks for offsite disposal, subject to completion of waste classification prior to excavation. The waste classification for the soil surrounding TP101 must incorporate historic detections of bonded asbestos identified during the TSI (Geosyntec, 2026).

6.5.2.2 Sampling Density and Analysis

Sampling will be undertaken with reference to the NSW EPA (2014b) *Waste Classification Guidelines: Part 1: Classifying Waste* and NSW EPA (2022) *Contaminated Land Guidelines: Sampling Design, Part 1*.

For stockpiled material, samples will be collected at a rate of one sample per 25 m³ with a minimum of three samples.

For in-situ waste classification, sampling will be based on the expected volume of material for disposal at a rate of one sampling point per 25 m³, with a minimum of three samples. For larger areas (>500m²), the number of sampling points will be determined by the area as outlined in Table 2 of the *Contaminated Land Guidelines: Sampling Design part 1* (EPA, 2022).

Each soil sample will be analysed for the general waste classification suite, including:

- Heavy Metals (As, Cd, Cr, Cu, Hg, Ni, Pb and Zn)
- TRH (Total Recoverable Hydrocarbons)
- BTEX (Benzene, Toluene, Ethylbenzene and Xylene)
- PAHs (Polycyclic Aromatic Hydrocarbons)
- OCPs (Organochlorine pesticides)
- OPPs (Organophosphate pesticides)
- PCBs (Polychlorinated biphenyls)
- Asbestos (500mL)

As required, further leachability testing (TCLP) analysis can be performed to assess the leachability of the contaminants.

Samples will be sent to a NATA-accredited laboratory for analysis.

The final remediation extent will be dependent on the successful validation sampling as outlined in Stage 3 (Section 6.5.3). Should validation samples be identified to exceed the remediation acceptance criteria, further excavation will be required until the results of the validation samples meet the criteria.

6.5.2.3 Surface soil Asbestos Impacts at Frag2/TP104

Surface fragments on the 10 x 10m soil surface surrounding Frag2/TP104 may be removed by hand-picking. The top 10 cm should be gently raked to expose any residual asbestos fragments. Any

identified potential asbestos-containing material shall be securely wrapped or contained within an asbestos disposal bag and disposed of at an appropriate facility licensed to accept asbestos waste as outlined in Managing asbestos in or on soil (NSW EPA, 2014).

6.5.2.4 Asbestos Impacted Soil Removal and Asbestos Air Monitoring

Management controls, including PPE requirements, must be implemented in accordance with the Asbestos Management Plan during asbestos removal works.

Based on current results, the asbestos-impacted soil surrounding TP101 contains bonded asbestos and must be removed offsite under minimum Class B asbestos removal conditions. While asbestos air monitoring is not a regulatory requirement for bonded asbestos removal, it is considered best practice and is recommended to confirm and ensure the airborne asbestos fibre concentrations remain below 0.01 asbestos fibres/mL during removal works.

Should friable asbestos be detected during the waste classification sampling (refer Section 6.5.2.1), an addendum to the RAP must be prepared outlining specifics of remediation and validation of friable asbestos impacted soil. This will include removing the material under Class A conditions, and asbestos air monitoring being mandatory. Air monitoring should be undertaken in accordance with the Guidance Note on the Membrane Filter Method of Estimating Airborne Asbestos Fibres (NOHSC:3003, 2nd edition, 2025).

The actions required following asbestos air monitoring results are presented in Table 6-4.

Table 6-4: Actions Following Asbestos Air Monitoring Results

Fibre Concentration (fibres/mL)	Actions
<0.01	No action, works may continue with existing controls
≥0.01 but ≤0.02	- Investigate the cause of the respirable asbestos fibre level; and - Review existing controls/ Implement additional controls to prevent exposure of anyone to asbestos;
>0.02	- Works to immediately stop, and Safework NSW is to be notified; Before work can resume - Investigate the cause of the respirable asbestos fibre level; and - Review existing controls/ Implement additional controls to prevent exposure of anyone to asbestos;

6.5.3 Stage 3: Validation

Validation will be undertaken by an Environmental Consultant. Validation will involve the following:

- Remedial areas surrounding TP101 and Frag2/TP104 will be assessed for visual evidence of asbestos, and an asbestos clearance certificate will be issued by an independent competent person as per the Work Health and Safety Regulation (2025).
- Collection of base surface and wall surface (if present) samples will be collected at the following sampling rate, which has taken into account double density sampling for asbestos:
 - Walls: A minimum of one sample per wall and one sample per 5 linear metres
 - Base: A minimum of three samples, with one sample per 25m²
 - For surficial remediation (Frag2/TP104), if no walls are present, the sampling rate for the base will be used.

- Laboratory analysis of each validation soil sample for Asbestos (500mL).
- Samples will be sent to a NATA-accredited laboratory for analysis.
- If validation sample results do not comply with Remediation Acceptable Criteria (Section 6.2), or visual evidence of asbestos is present, further excavation will be undertaken as per Stage 2 until validation results of the soil surface comply with the Remediation Acceptable Criteria and no visual evidence of asbestos is present.
- Validation sampling will follow Quality Assurance and Quality Control objectives as outlined in Appendix B.

6.5.4 Stage 4: Fill Importation and Site Restoration – *if required*

To reinstate the remedial excavation, clean fill and/or topsoil may be required. Imported material must comply with and be consistent with the requirements detailed in Section 6.2.3.

Compaction requirements, where applicable, shall be determined by the appointed geotechnical consultant.

7. Unexpected Finds Protocol

7.1 Types of Unexpected Finds

Unexpected finds of potential contamination may be identified by visual (appearance or staining) and/or olfactory (odour) evidence during earthworks. Potential unexpected finds which could be reasonably encountered include (but are not limited to):

- Presence of fibre cement fragments or other materials potentially containing asbestos.
- Buried infrastructure such as underground storage tanks and associated pipe work.
- Groundwater that exhibits hydrocarbon (or oily) sheen or odour.
- Olfactory evidence of contamination such as chemical odour, hydrocarbon odour, sulfur (rotten egg) odour, acidic odour, ammonia odour, caustic odour, solvent odour.
- Soil staining.
- Significant presence of anthropogenic materials

7.2 Procedure in the Event of an Unexpected Find

Should unexpected finds of contamination or potential contamination be found onsite, the following procedure shall be adopted:

1. Stop work as soon as it is safe to do so and move to a designated meeting point.
2. Assess the potential risk to human health posed by the unexpected find and assess if evacuation needs to be conducted or emergency services need to be contacted.
3. Delineate an exclusion zone around the unexpected find with appropriate barrier and signage.
4. Contact a suitably qualified environmental consultant, who should provide advice for:
 - a. Immediate management controls to minimise potential immediate health or environmental risk
 - b. What further assessment and/or remediation works are required, and how such work should be conducted
 - c. Requirement for an updated RAP (if required) and associated validation works
 - d. Requirement of reporting to regulatory bodies (Department of Infrastructure and Regional Development, etc.)
5. Works shall not recommence in the area of the unexpected find until an environmental consultant provides advice that the unexpected find has been adequately managed/remediated.
6. Assessment and/or validation of the unexpected find shall be provided in the Validation Report for the site.

7.3 Records and Reporting

The Remediation Contractor shall prepare a list of unexpected finds. The Validation Report shall document:

- Details of the unexpected finds encountered during development work (if any)
- Details of actions undertaken to address the unexpected finds
- Assessment results (if any)
- Results of remediation and validation (if any)
- Recommendations for further assessment as a result of the unexpected find (if any)
- Requirement of ongoing monitoring as a result of the unexpected find (if any)

8. Contingency Plan

Contingency Plan for the remediation is as follows:

Table 8-1: Contingency Plan

Item	Contingency
Contamination requiring management was identified during the soil validation program.	Unexpected finds protocol adopted.
Unexpected finds encountered by the site contractor during site works.	Enact the Unexpected Finds Protocol detailed in Section 7.
Inadequate stockpile management practices, potentially contaminated runoff, etc.	Enact cleanup and mitigation measures (where required), and review management/control practices. Upon receipt of review findings, immediately implement recommended measures.

9. Validation Report

At the completion of the remediation and validation of the site, a validation report shall be prepared in general accordance with the NSW EPA (2020) Consultants Reporting on Contaminated Land - Contaminated Land Guidelines and NEPM (2013). The validation report shall provide elements required in the above guidelines, including (but not limited to):

- Summary of remediation activities
- Unexpected finds management
- Validation sampling and analysis
- Material tracking and waste disposal information, including waste disposal dockets
- Statement of site suitability

10. Conclusion

This RAP provides a strategy for remediation of asbestos impacts at 475 Badgerys Creek Road, Bradfield, NSW, to render the site suitable for the proposed industrial land use.

The preferred options selected for the remediation is:

- On-site treatment of surface fragments by hand picking; and
- Removal of contaminated soil material to an approved site or facility.

The subsequently exposed excavation surfaces will be subject to validation sampling and, if required, the reinstatement of the area using clean fill.

Following completion of remediation works, a validation report will be prepared to confirm that the remedial objectives have been met, and the site has been made suitable for the proposed industrial land use, consistent with the requirements of Section 4.6 of the State Environmental Planning Policy (Resilience and Hazards) 2021.

11. References

- DUAP & EPA (1998) Managing Land Contamination Planning Guidelines, SEPP 55 – Remediation of Land
- Geosyntec (2025) – Preliminary Site Investigation, 475 Badgerys Creek Road, Bradfield, NSW 2556 AU123057-020 SYDx Bradfield NSW, dated 15 August 2025; and
- Geosyntec (2026) – Targeted Site Investigation, 475 Badgerys Creek Road, Bradfield, NSW, Report ref: 26008955-001-R1-Rev1 Bradfield 260421, dated 21 April 2026
- NEPM (2013) National Environment Protection (Assessment of Site Contamination) Measure, Schedule A and Schedules B(1)-B(9). National Environment Protection Council, Adelaide
- NSW EPA (2014a) Managing asbestos in or on soil
- NSW EPA (2014b) Waste Classification Guidelines: Part A – Classifying Waste.
- NSW EPA (2020) Consultants reporting on contaminated land: Contaminated Land Guidelines
- NSW EPA (2022) Contaminated Sites: Sampling Design Guidelines.
- NSW Government (2022) Aerotropolis Precinct Plan; Western Sydney Aerotropolis DCP
- NSW Government (2023) State Environmental Planning Policy (Resilience and Hazards) 2021
- NSW Government (2025) Contaminated Land Management Act 1997
- NSW Government (2025) Protection of the Environment Operations Act 1997.
- NSW Government (2025) Work Health and Safety Regulation 2025.
- NSW Government (2026) Environmental Planning Policy (Precincts – Western Parkland City) 2021
- NSW Government (2026) Work Health and Safety Act (2011) and Regulations (2017).
- Safework NSW (2022) Code of practice, How to manage and control asbestos in the workplace
- Senversa (2020) – Preliminary Site Investigation, 475 Badgerys Creek Road, Badgerys Creek, NSW, Report Ref: S17514_003_RPT_Rev1_Badgerys Creek_PSI, dated 30 October 2020;
- Senversa (2023) – Asbestos Management Plan, 475 Badgerys Creek Road, Badgerys Creek NSW, Report Ref: S20891_002_RPT_AMP_Rev2, dated 09 November 2023;
- Senversa (2024) – Badgerys Creek Environmental Report, 475 Badgerys Creek Road, Badgerys Creek NSW, Report Ref: S17514_018_EnvRep_Rev4, dated 17 June 2024;
- Senversa (2025) – Targeted Soil Assessment – Former Sediment Ponds, 475 Badgerys Creek Rd, Bradfield NSW, Report Ref: S20891_025_LTR_Rev0, dated 31 July 2025;
- SLR (2024) Framework Construction Environmental Management Plan, 475 Badgerys Creek Road, Bradfield, Report Ref: 660.30252.00000-R02, dated 06 June 2024
- WADOH (2021) Guidelines for the assessment, remediation and management of asbestos contaminated sites

12. Limitations

This report has been prepared by Geosyntec Consultants Pty Ltd ("Geosyntec") for use by the Client who commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the Client and other parties. The findings of this report are based on the scope of work outlined in Section 1. The report has been prepared specifically for the Client for the purposes of the commission, and use by any explicitly nominated third party in the agreement between Geosyntec and the Client. No warranties, express or implied, are offered to any third parties and no liability will be accepted for use or interpretation of this report by any third party (other than where specifically nominated in an agreement with the Client).

This report relates to only this project and all results, conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. This report should not be reproduced without prior approval by the Client, or amended in any way without prior written approval by Geosyntec.

Geosyntec's assessment was limited strictly to identifying environmental conditions associated with the subject property area as identified in the scope of work and does not include evaluation of any other issues.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigation.

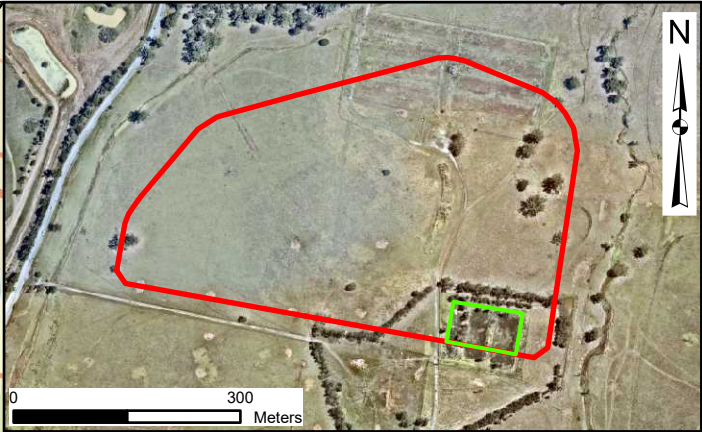
This report does not comment on any regulatory obligations based on the findings. This report relates only to the objectives stated and does not relate to any other work conducted for the Client.

The absence of any identified hazardous or toxic materials on the site should not be interpreted as a guarantee that such materials do not exist on the site.

All conclusions regarding the site are the professional opinions of the Geosyntec personnel involved with the project, subject to the qualifications made above. While normal assessments of data reliability have been made, Geosyntec has not independently verified and assumes no responsibility or liability for errors in any data obtained from regulatory agencies, statements from sources outside of Geosyntec, or developments resulting from situations outside the scope of this project.

Geosyntec is not engaged in environmental assessment and reporting for the purpose of advertising sales promoting, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. The Client acknowledges that this report is for its exclusive use.

Figures



Legend

- Property Boundary (Ingham Estate)
- Former Sediment Pond Area
- Approximate Site Boundary



0 5 Kilometers

Site Location Map

Inghams Estate, 475 Badgerys Creek Road
Bradfield, NSW 2556, Australia

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26008955

April 2026

Figure
1



Legend

- ▭ Approximate Site Boundary
- ▭ Former Sediment Pond Area
- ▣ Soil Investigation Locations
- Surface Fragments
- ▭ Soil Remediation Area
- ▭ Surface Remediation Area



0 20 Meters

Site Remediation Area

Inghams Estate, 475 Badgerys Creek Road
Bradfield, NSW 2556, Australia

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Figure
2

Appendix A

Previous Investigation Results and Figures





Legend

- ▬ Approximate Site Boundary
- ▬ Former Sediment Pond Area
- ▬ Former Sediment Ponds
- Soil Investigation Locations
- Historical Soil Investigation Locations (Senversa 2025)
- Surface Fragments



0 20 Meters

Soil Investigation Locations

Inghams Estate, 475 Badgerys Creek Road
Bradfield, NSW 2556, Australia

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Figure
2

Spatial Reference
Name: GDA2020 MGA Zone 56

	Date	Weight of 10L Sample (kg) ¹	Weight of bonded asbestos (g) ¹	Bonded Asbestos % (w/w)	Asbestos	Asbestos FA/AF (%w/w)
Soil HSL D - Commercial/Industrial				0.05		0.00%
TP101_0.4-0.5	12/03/2026	15.8	22.42	0.14	Detected	<0.001
TP102_0.05-0.1	12/03/2026	14.2	NVA	<0.05	NAD	<0.001
TP103_0.05-0.1	12/03/2026	13.8	NVA	<0.05	NAD	<0.001
TP104_0.3-0.4	12/03/2026	14.7	NVA	<0.05	NAD	<0.001
TP105_0.7-0.8	12/03/2026	12.6	NVA	<0.05	NAD	<0.001
TP105_1.3-1.4	12/03/2026	12.1	NVA	<0.05	-	-
TP106_1.4-1.5	12/03/2026	15.3	NVA	<0.05	NAD	<0.001
TP107_0.1-0.2	12/03/2026	15.4	NVA	<0.05	NAD	<0.001
TP108_0.7-0.8	12/03/2026	13.4	NVA	<0.05	NAD	<0.001
Frag1	12/03/2026	-	-	19.98	Detected	<0.001
Frag2	12/03/2026	-	-	19.73	Detected	<0.001

¹ Indicates field analysis as per WADOH, 2021 Guidelines for the assessment, remediation and management of asbestos contaminated sites

NVA - No visual ACM identified

NAD - No asbestos detected

Appendix B

Quality Assurance and Quality Control



B1. Data Quality Objectives

Data quality objectives (DQOs) for validation activities outlined below were developed in general accordance with NEPM (2013):

Table B1: Data Quality Objectives

Step	DQO
Step 1: State the problem	The known contamination issues to be addressed in this RAP were: • Surficial asbestos identified at sample Frag2 adjacent to TP104. • Asbestos impacted soil identified at TP101 • Potential unexpected finds across the site encountered during the proposed works Stake holders include: • Site Occupier: TBC • Site Owner: TBC • Regulator: Department of Planning, Housing and Infrastructure • Environmental Consultant: Geosyntec Conceptual Site model: • Contaminants: Asbestos • Source: Soil on the western embankment of the sediment pond area • Receptors: Current site users, future site users, site construction and maintenance workers and occupants/visitors • Pathways: Inhalation of airborne fibres
Step 2: Identify the decisions/goal of the study	The remedial goal is to mitigate exposure risk associated with identified site contamination via offsite disposal of impacted material. The decisions are: • What disposal options are available? • What is the extent of the contamination?
Step 3: Identify information inputs	Existing Information • Previous investigation results, including site history, field observations and laboratory results • Remediation acceptance criteria. Required Information: • Waste Classification data, including field observations and laboratory results. • Validation data, including field observations and laboratory results. Relevant Investigation Criteria • NEPC 2013 • NSW EPA 2020 • NSW EPA 2022
Step 4: Define the study boundaries	Spatial boundaries: • The impacted areas are: – TP101: 10m x 10m to a depth of 800mm resulting in an Estimated 80m³ of impacted soil – Frag2/TP104: Surface impacts in a 10m x 10m area surrounding Frag2/TP104. • Horizontal boundaries are shown in Figure 2. • Vertical boundary is shown in Figure 3 Temporal Boundary • There are no site access restrictions

Step 5: Develop the analytical approach or decision rule	- The results of the QA/QC assessment meet this RAP - Across the site: - Validation sampling of site remediation areas shall be carried out in accordance with the requirement of this RAP. - Additional materials placed on the site shall meet the requirements of this RAP, based on assessment results, observations, and/or provided documentation. - In the area of unexpected finds: - Validation of unexpected finds shall meet the requirements of this RAP. - Samples will be submitted to NATA-accredited laboratories
Step 6: Specify the performance or acceptance criteria	Remediation acceptance criteria are provided in Section 6.2.
Step 7: Optimise the design for obtaining data	Validation sampling plan is provided in Sections 6.5.3.

B2. Fieldwork and Laboratory QA/QC

B2.1 Fieldwork QA/QC and Methodology

Fieldwork methodology is as follows:

Table B2: Fieldwork Methodology

Item	Methodology
Soil sampling procedure	Samples will be collected using a decontaminated stainless-steel trowel, hand auger, or placed directly into laboratory supplied containers using a new pair of nitrile gloves. The containers will be labelled with sample identification, sample depth, date, project number.
Decontamination procedure	Non-disposable sampling equipment will be decontaminated between sampling by scrubbing with a brush, washing in Decon 90 solution and rinsing with water.
Sample handling and preservation procedures	Samples will be transported to a NATA accredited laboratory under chain of custody analysis.
Duplicates	Due to the sporadic nature of asbestos contamination duplicates are not required for asbestos sampling
Rinsate blank	Not required for asbestos sampling
Trip spike and trip blank	Not required for asbestos sampling

B2.2 Laboratory QA/QC and Data Quality Indicators

Samples will be analysed in NATA accredited laboratory(s) which will provide analysis in accordance with NEPM (2013). The data quality will be checked against the acceptance targets for: method blank, laboratory duplicates, matrix spikes, laboratory control samples, surrogates.

Data quality indicators (DQIs) for blanks, duplicates, and spikes are provided in Table B3.

Table B3: Data Quality Indicators

QA/QC Sample	Acceptance Target
Duplicate	Relative percentage difference (RPD) within 50% for soil Not required for asbestos sampling

Spikes	Recoveries within the following ranges: • 70% - 130% for inorganics/metals • 60% - 140% for organics • Or as determined by the laboratory Not required for asbestos sampling
Blanks	Analytes not detected above LOR Not required for asbestos sampling

Geosyntec Consultants Pty Ltd

ABN: 23 154 745 525

www.geosyntec.com.au

Sydney

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