

24 March 2026

Lachlan O'Reilly
Goodman Western Sydney Pty Ltd
'The Hayesbery'
1 – 11 Hayes Road
ROSEBERY, NSW 2018

Email only: Lachlan.OReilly@goodman.com

Dear Mr O'Reilly,

RE: Interim Site Audit Advice – Review of Revised Remedial Action Plan

Background

James Davis of Enviroview Pty Ltd has been engaged by Goodman Western Sydney Pty Ltd (Goodman) to provide the services of a NSW EPA Contaminated Land Accredited Site Auditor, to conduct a Site Audit in relation to the land identified as 235 Martin Road, Badgerys Creek, NSW.

The Site Audit for the site had commenced under the engagement to the previous owner CSR Building Products Ltd (CSR) to conduct a non-statutory Site Audit.

The site has since been sold to Goodman, with CSR terminating the Site Audit and Goodman engaging the Site Auditor to complete the Site Audit. Since Goodman purchased the site, a new consultant has been appointed (JBS&G) and a Combined Preliminary and Detailed Site Investigation has been prepared for the site.

Following the PSI/DSI a Remedial Action Plan (RAP) was prepared to meet the requirements of the Planning Secretary's Environmental Assessment Requirements (SEARs) for the proposed State Significant Development Application (SSDA) No. 97711727. The RAP was reviewed and review comments provided in an earlier Interim Advice (IA05).

Purpose of this Interim Advice

The purpose of this interim advice is to review the response to the Site Auditor Comments (IA05) and the revised RAP.

This Interim Advice has been prepared regarding the following reports:

JBS&G. Responses to Auditor Comments IA05 and IA06 – Review of Remedial Action Plan and Fill Management Plan, 225-245 Martin Road, Bradfield NSW. Document Ref: 70609 | 174644 (Rev 0), dated 18 March 2026.

JBS&G. SSD-97711727 Site Wide Remedial Action Plan, 225-245 Martin Road, Bradfield NSW 2556. Document Ref: 70609 | 173973 (Rev 01), dated 24 March 2026.

This interim advice does not constitute a Site Audit Statement or a Site Audit Report but is provided to assist in the management of potential contamination issues at the site regarding requirements of the Site Audit. The information provided herein should not be considered pre-emptive of the final audit conclusions. A Site Audit Report and Site Audit Statement will be prepared at the conclusion of the site audit.

Remediation Action Plan Requirements

According to the NSW EPA *Guidelines for Consultants Reporting on Contaminated Sites* (NSW EPA, 2020) a RAP should:

- summarise the findings of the preliminary and detailed site investigations and risk assessment (where applicable), and present the refined conceptual site model
- document the identified contamination risks to human health and/or the environment
- set remediation objectives that ensure the remediated site will be suitable for its current and/or proposed use and which will result in no unacceptable risk to human health or to the environment and state remediation criteria
- define the extent of remediation required across the site
- assess options and remedial technologies to achieve the remediation objectives and select and justify a preferred approach, which must include the consideration of the principles of ecologically sustainable development
- document in detail all procedures and plans to reduce risks posed by contamination to acceptable levels for the proposed site use
- identify the need for and reporting requirements of remedial technology pilot trials (if applicable)
- establish the environmental safeguards required to complete the remediation in an environmentally acceptable manner, including consideration of the potential for off-site impacts (such as air quality, odour, and aesthetics)
- address contingencies and unexpected finds protocols
- identify the necessary approvals and licences required by regulatory authorities including any items contained in development consent conditions
- clearly outline waste classification, handling, and tracking requirements in accordance with the Guidelines for the NSW Site Auditor Scheme and Waste Classification Guidelines (EPA 2014)
- ensure remediation is consistent with relevant laws, policies (including planning instruments and policies) and guidelines and reference these in the RAP
- identify how successful implementation of the RAP will be demonstrated, for example the validation requirements by documentation of site works and sampling and analysis
- identify the need for, and nature of, any long-term management and/or monitoring following the completion of remediation and, if required, provide an outline of an environmental management plan, and include this in the RAP.

Remedial Action Plan Summary

The key points included in the revised RAP are as follows:

- The RAP summarises the previous DSI investigation which identified areas of concern requiring remediation and/or management, as well as contamination related data gaps requiring further investigation.
 - TRH has been detected in soil within the former factory footprint, and below ground infrastructure remains including pits, drains and pipework considered to be the source of TRH impact.
 - Free product has been identified in one groundwater monitoring well within the former factory footprint.
 - Asbestos on the ground and within near surface fill has been identified at the site
 - Copper, nickel and zinc have been detected above ecological criteria at the site, however based on the proposed land use and hardstand or garden beds across the site, remediation of these exceedances is not proposed.
 - Copper has been reported above the adopted criteria in groundwater and is considered consistent with background concentrations.
 - Trace PFAS has been reported in groundwater at the site, above the NEMP (HEPA, 2026) criteria, but below the PFOS Technical Brief (anion comparison) (ANZG 2026).
- The site will be developed for commercial industrial land use, with a small section of the site proposed for public open space. Validation of this area of the site is proposed in accordance with the relevant criteria.
- Remediation criteria have been presented which are intended to be applied during the remedial works and are based on a range of sources. CRC Care (2011) criteria have been presented where free product has been identified. This is in lieu of the NEPM (2013) criteria which are based upon the source specifically being petrol and/or diesel products with apportioning of aromatic or aliphatic fractions of TRH which is not consistent with the product identified.
- Imported materials must be accompanied by relevant documentation and will be assessed in accordance with a Fill Management Plan (FMP) (JBS&G 2026) that has also been reviewed in this Site Audit.
- The conceptual site model has identified 11 areas of concern including:
 - AEC 1: Active Quarry/Rehabilitation Area/Quarry Offices, Carpark and Plant Storage – Fill of unknown origin which will be characterised in accordance with the FMP (JBS&G 2026).
 - AEC 2: Former Brick Making Factory – TRH impact, surface asbestos and potential PFAS in groundwater which will require remediation to resolve TRH NAPL and associated soil impact, surface ACM and anticipated ACM in infrastructure.
 - AEC 3: Tile Storage and Distribution Area – Fill of unknown origin which will be characterised in accordance with the FMP (JBS&G 2026).
 - AEC 4: Former Farm Structures – Potential impacts because of improper and/or incomplete demolition of former structures and fill of unknown origin. This will be managed as part of the FMP (JBS&G 2026) and validation works.
 - AEC 5: Fill Area '19' – fill of unknown origin which will be characterised in accordance with the FMP (JBS&G 2026).

- AEC 6: On-site sewer treatment infrastructure which will require assessment.
- AEC 7: Farm dams and Drainage Channels which will be characterised in accordance with the FMP (JBS&G 2026) and dewatering of dams will occur in accordance with the stormwater management plan.
- AEC 8: Internal Access Roads comprising fill of unknown origin which will be characterised in accordance with the FMP (JBS&G 2026).
- AEC 9: Stockpiles generated from quarrying activities which will be characterised in accordance with the FMP (JBS&G 2026).
- AEC 10: Topsoil across farmland areas where minor asbestos impact requires further assessment.
- AEC 11: Fill area within the eastern portion of pit 1 (UCF 4) where further assessment works are required.
- The following data gaps have also been identified to be addressed during remediation works:
 1. Quarry rehabilitation area (uncontrolled fill)
 2. Former brick making factory (TRH in soil and seepage water and asbestos in surface soil)
 3. BH108/Former farm structures (known ACM in soil and potential additional asbestos and fill of unknown origin)
 4. Site wide (PFAS in groundwater)
 5. Sewer infrastructure (PFAS/nutrients/biological/heavy metals/PAHs)
 6. Farm dam water and sediments (potential contamination)
 7. Proximity to BH126_0.0-0.1 (ACM in soil at 0.033 % w/w)
 8. Proximity to BH160_0.0-0.1 (AF/FA in soil at 0.0005 % w/w)
 9. Proximity to BH220_0.0-0.1 (AF/FA in soil at 0.026 % w/w)
 10. UCF4 (potential asbestos/fill of unknown origin)
- Remedial options are assessed in accordance with the NEPM 2013 hierarchy, considering for each contaminant type: on-site treatment, off-site treatment and return, on-site containment, off-site disposal and, where appropriate, long-term management
- The preferred remedial approach includes:
 - Removal of site infrastructure within the factory footprint including delineation of drainage lines/pits considered to be primary sources of subsurface TRH impacted soil and removal of any impacted water and/or free oils.
 - Excavation and on-site bioremediation of petroleum hydrocarbon impacted soils.
 - Removal, to the extent practicable, of hydrocarbon contaminated seepage water(s) from remedial excavations (where encountered) and either off-site disposal or onsite treatment.
 - Excavation, relocation and on-site containment of asbestos impacted soils and/or spreading and picking of asbestos impact (where non-friable in nature) to reduce contaminant concentrations to an acceptable level.

- Implementation of additional investigation to assess a range of data gaps identified as part of the P/DSI (JBS&G 2026).
- Onsite long-term containment of asbestos contaminated soils via a containment cell/capping profile which has capacity of up to 100,000m³.
- Additional groundwater assessment using hydrasleeves is proposed for analysis of heavy metals, TRH/BTEX, PAHs and PFAS. This will further characterise shallow and deep groundwater at the site.
- Sewer infrastructure will be removed and validated, and farm dams will be decommissioned.
- The RAP describes the decision rules for remediation and validation using Data Quality Objectives (DQOs).
- Validation details have been provided for excavations formed by infrastructure removal; excavations formed by soils excavation; validation of treated materials; validation of stockpile bases/soil treatment compound; validation of excavation/seepage water at BH104/MW101; soil vapour validation sampling (contingency); asbestos excavations; asbestos impacted soil containment; soil validation sampling; validation of imported materials; groundwater condition; validation of recreational/open spaces; quarry rehabilitation works/fill placement validation and final site inspections.
- Validation is proposed in stages due to the proposed development scenario resulting in subdivision of the site into 14 lots.
- A LTEMP will be prepared for relevant portions of the site where contaminated material will be retained.
- A site management plan has been included in the RAP including interim site management, OHS and environmental management.
- The consultant concluded:
 - The proposed actions outlined in the RAP conform to EPA requirements because they are technically feasible, environmentally justifiable, and consistent with relevant laws, policies and guidelines endorsed by NSW EPA.
 - Subject to the successful implementation of the measures described in this RAP and the recommendations below, the risks posed by potential direct human contact pathways/potential exposure of contaminated soils and/or seepage water can be managed in such a way as to be adequately protective of human health such that the land can be made suitable for the proposed land use. It is further concluded that any potential sources to on-going groundwater impacts will be appropriately addressed by the implementation of the remedial works documented herein.
- The consultant recommended:
 - The proposed development is reviewed following availability of detailed development plans to confirm the consistency with the nature of potential exposures as characterised with the generic development type consisted in this RAP and that which will confirm with the finalised site design.
 - Continuing review of the appropriateness of the remedial strategy is undertaken by consultation with the Site Auditor.

- An Asbestos Management Plan (AMP) is prepared to control the exposure to the asbestos hazard prior to the commencement of remedial works in accordance with relevant WHS requirements.
- A Work Health Safety Plan (WHSP) and Remediation Environmental Management Plan (REMP) inclusive of the AMP and Community and Stakeholder engagement plans will also be prepared by the remedial contractor prior to remedial works.
- An LTEMP will be required will need to be prepared for a portion of the site to ensure the long-term integrity of the proposed containment measures for asbestos. The LTEMP is required to be endorsed by the site Auditor prior to completion of the site audit on that portion of the site.

Site Auditor Opinion and Endorsement of the Remedial Action Plan

The revised Site Wide Remedial Action Plan generally addresses the Auditor's comments in Interim Advice 05. The PSI/DSI that informs the proposed remediation is sufficiently comprehensive to identify contamination of the site. Data-gaps have been correctly identified, and additional supplementary investigation are appropriately proposed in the RAP.

The proposed remediation approach is considered appropriate for the site regarding the nature of the contamination identified and the proposed use.

Based on the review of the site investigation works and RAP, the above-referenced RAP is endorsed by the Site Auditor. It is the opinion of the Site Auditor that if implemented the site can be made suitable for the proposed land use.

Closing

Thank you for time on this matter and if you require additional information or clarification, please do not hesitate to contact me.

Yours sincerely



James Davis
NSW EPA Contaminated Land Site Auditor
Enviroview Pty Ltd