

ACT MATERIALS RECOVERY FACILITY

# ADDENDUM TO APPENDIX I SAMPLING ANALYSIS AND QUALITY PLAN

Prepared for Veolia Environmental Services (Australia) Pty Ltd | 2 April 2025

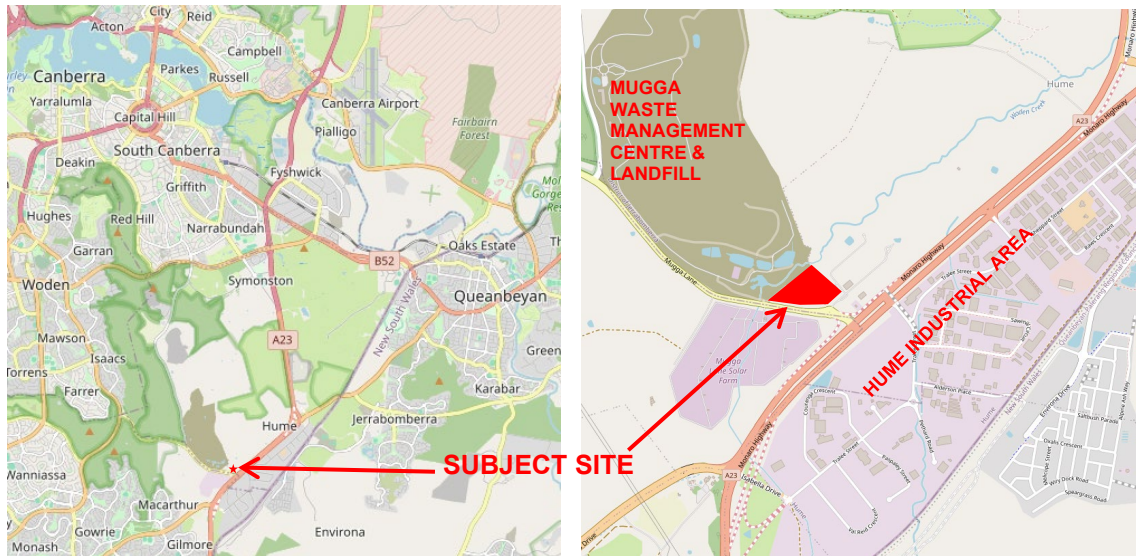


## Introduction

This report is prepared as an Addendum to *Appendix I – Sampling Analysis and Quality Plan* prepared by GHD for ACT NoWaste in 2023 and submitted with a draft EIS for a new Materials Recovery Facility (MRF) on Block 12 Section 25 Hume, refer Figure 1.

Since that time ACT NoWaste has passed the responsibility to finalise the EIS to Veolia. GHD are not in a position to complete the EIS and as such, Veolia has engaged Element Environment to undertake this work.

**Figure 1: Site Location**



Veolia has made changes to the proposed site layout and design of the MRF to achieve operational efficiencies (refer Figure 2 & 3).

**Figure 2: Veolia Revised Site Plan**



**Figure 3: GHD Concept Plan**



The GHD *Appendix I – Sampling Analysis and Quality Plan* was prepared to provide a framework for the Targeted Site Investigation (prepared as Appendix J to the EIS). The purpose being to ensure the field investigations and analyses are undertaken in a way that enables the collection and reporting of reliable data in accordance with the *National Environment Protection (Assessment of Site Contamination) Measure* (NEPM NEPC, 2013).

## Conclusions

The recommended Targeted Site Investigation has been completed and included as Appendix J to the EIS. As such, the revised Veolia proposal does not involve any changes or additions to this Sampling Analysis and Quality Plan.



# Hume Materials Recovery Facility

**Sampling Analysis and Quality Plan  
(SAQP) for targeted site investigation**

Transport Canberra and City Services

16 June 2023

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# Contents

<b>1.</b>	<b>Introduction</b>	<b>1</b>
1.1	Background	1
1.2	Objectives	1
1.3	Purpose	1
1.4	Scope of work	1
1.5	Applicability	2
1.6	Limitations	2
<b>2.</b>	<b>Site and environmental setting</b>	<b>3</b>
2.1	Site identification	3
2.2	Environmental setting	4
2.2.1	Topography	4
2.2.2	Soils and landscapes	4
2.2.3	Hydrology	4
2.2.4	Geology	4
2.2.5	Hydrogeology	4
2.3	Summary of site use and history	5
<b>3.</b>	<b>Preliminary CSM and data gap review</b>	<b>6</b>
<b>4.</b>	<b>Data quality objectives</b>	<b>7</b>
<b>5.</b>	<b>Basis for assessment</b>	<b>9</b>
5.1	Relevant guidelines	9
5.2	Contaminants of potential concern	9
5.3	Adopted assessment criteria	9
<b>6.</b>	<b>Sampling and laboratory analysis program</b>	<b>11</b>
6.1	Investigation areas	11
6.2	Methodology	13
6.2.1	Health and safety	13
6.2.2	Underground service clearance	13
6.2.3	Soil sampling	13
6.3	Laboratory program	14
6.3.1	Laboratories	14
6.3.2	Sample handling	14
<b>7.</b>	<b>Quality assurance / quality control program (QA/QC)</b>	<b>15</b>
7.1	Field program QA/QC	15
7.1.1	Field quality assurance procedures	15
7.1.2	Sampling and analysis quality control	15
7.1.3	Relative percentage difference calculations	16
7.2	Laboratory QA/QC	16
7.2.1	Laboratory analytical programs	16
7.2.2	Laboratory quality control procedures	16
<b>8.</b>	<b>Reporting</b>	<b>18</b>
<b>9.</b>	<b>References</b>	<b>19</b>

## Table index

Table 1	Site information summary	3
Table 2	BoM five closest boreholes to the site	5
Table 3	Proposed AECs for targeted site investigation	6
Table 4	Data quality objectives	7
Table 5	Rationale for adopted criteria for soil assessment	9
Table 6	Proposed soil sampling and analysis program	12
Table 7	Sampling and analysis QA/QC analytical program	16
Table 8	Acceptable laboratory RPD ranges	17

## Appendices

Appendix A	Figures
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# 1. Introduction

## 1.1 Background

The ACT Government is proposing to replace and upgrade the existing Material Recovery Facility (MRF) on Block 12, Section 25 Hume, ACT (the site). The site is located to the north of the Monaro Highway in an industrial and rural area located approximately 12.5 km south of Canberra City (refer to Figure 1, Appendix A). The existing MRF was extensively damaged due to fire on 26 December 2022 and the facility is non-operational. The main shed remains standing and is currently being used as a waste transfer station to accept recyclables, sort and store materials before being shipped to other processing facilities.

The proposal would replace the existing MRF and provide technological improvements to facilitate greater resource recovery by both increasing the quality of recycled materials and by reducing the amount of non-recyclable residual waste generated that is currently sent to landfill. The new Hume MRF would be one of the first advanced facilities in Australia to enable separation mixed plastics. Upgraded technology would also improve the quality and therefore marketability of paper and mixed cardboard, mixed plastics and glass that would be received from the ACT and five regional NSW councils.

The proposal would be designed to process up to 115,000 tonnes per year of mixed recyclables. The proposed capacity would provide for population growth and changing consumer behaviours which are expected to contribute to increases in recoverable materials over time.

Key features of the proposal include:

- Replacement of the existing MRF
- Additional warehouse style facilities
- Civil works and piling to support the dynamic loads imposed by rotating and high frequency vibrating equipment
- Expansion of hardstand space towards the west of the site
- A trade waste system to capture contaminated stormwater runoff

The proposal is considered an Impact Track Development under Schedule 4 of the *Planning and Development Act 2007* (P&D Act), requiring the preparation of an Environmental Impact Assessment (EIS) in accordance with the Scoping Document for application number 202200011. As part of the scoping document requirements, GHD Pty Ltd (GHD) was engaged to undertake a preliminary site investigation (PSI) (GHD, 2023). The PSI identified areas of potential environmental concern (APEC) requiring a targeted site investigation (TSI).

GHD has prepared the following Sampling, Analysis and Quality Plan (SAQP) for ACT NoWaste to support the TSI of these APECs and meet the objectives as defined in Section 1.2.

## 1.2 Objectives

The primary objective of the TSI is to collect soil contamination data from the proposal site to assess the potential risk to human health in aim to support planning approval and future development of the proposal site.

The current extent of contamination at the proposal site is unknown.

## 1.3 Purpose

The purpose of this SAQP is to document the procedures that will be used to obtain data of sufficient quality to meet the objectives set out in Section 1.2 and enable completion of a TSI report.

## 1.4 Scope of work

The scope of this SAQP is as follows:

- Data Quality Objectives (DQO'S) which have been prepared in accordance with the National Environment Protection (Assessment of Site Contamination) Measure (NEPM) (NEPC, 2013) to ensure that field investigations and analyses are undertaken in a way that enables the collection and reporting of reliable data (see Section 4).
- The basis of the assessment including details of the guidelines, policies and legislation that the investigation has been developed for (see Section 5).
- The proposed analytical program and rationale for sampling (see Section 6.1).
- Proposed sampling methodology (see Section 6.2).
- Quality Assurance and Quality Control protocols (see Section 7).
- The reporting requirements (see Section 8)

This SAQP only covers the TSI for the proposal site. Other media (for example surface water, groundwater and soil gas) is not included in this report and will be covered at a later stage of the proposal if required.

## **1.5 Applicability**

This SAQP applies to GHD personnel working at the site. A copy of this report should be available on-site at all times. All GHD personnel working on-site are to be familiar with the report. If a situation arises in which deviations from the SAQP are required, ACT Government representatives, and the GHD project manager and technical lead are to be notified prior to undertaking changes.

## **1.6 Limitations**

This report has been prepared by GHD for Transport Canberra and City Services and may only be used and relied on by Transport Canberra and City Services for the purpose agreed between GHD and Transport Canberra and City Services as set out in section 1.5 of this report.

GHD otherwise disclaims responsibility to any person other than Transport Canberra and City Services arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer section(s) 1.5 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

If this report is required to be accessible in any other format, this can be provided by GHD upon request and at an additional cost if necessary.

## 2. Site and environmental setting

### 2.1 Site identification

A summary of the site information is provided in Table 1. The proposal site location and layout is shown in Figure 1, Appendix A.

Table 1 Site information summary

<b>Address</b>	1 John Cory Circuit, Hume ACT 2620
<b>Block and Section</b>	Hume: Block 12, Section 25
<b>Current Land Use</b>	Southern portion: waste transfer including storage of glass and cardboard/paper and baling of plastics. Northern portion: vacant
<b>Size (m<sup>2</sup>)</b>	50,619 (Reference source: <a href="https://actmapi.act.gov.au">https://actmapi.act.gov.au</a> )
<b>Land Zoning</b>	IZ1: General Industry
<b>Immediate Surrounds</b>	<ul style="list-style-type: none"> <li>– North: Dog Trap Creek, Mugga Landfill leachate and surface water management ponds and landfill site.</li> <li>– South: Mugga Lane and Mugga Lane Solar Park</li> <li>– East: ACT Skip Hire, Recycling Road and proposed food organics and garden organics (FOGO) facility site</li> <li>– West: Vacant land and drainage areas alongside Mugga Lane</li> </ul>
<b>Broad description of location</b>	<ul style="list-style-type: none"> <li>– The site is located to the north of the Monaro Highway in an industrial and rural area located approximately 12.5 km south of Canberra City.</li> <li>– West of the site is Mugga Lane landfill which includes a number of surface water and leachate management dams.</li> <li>– South of the site is Mugga Lane Solar Park and ACT Skip Hire and Soft Landing Mattress Recycling</li> <li>– The site has previously been utilised as a materials recycling facility with recycled material treated and stored at the site.</li> </ul>
<b>Site walkover Summary</b>	<p>In summary, the following observations were made during GHD walkover on 15 March 2023:</p> <ul style="list-style-type: none"> <li>– Existing MRF Hardstand area <ul style="list-style-type: none"> <li>• Hardstand area associated with the existing MRF covers Block 6, Section 25 excluding the north-west boundary which is open earth area. Block 6 Section 25 is currently being used as a waste transfer area.</li> <li>• The hardstand area adjacent north-west of the existing MRF was being used to dump unsorted recyclables from waste trucks to be transferred by forklifts for sorting (see Photograph 1).</li> <li>• Mixed recyclables (including, but not limited to, high density polyethylene (HDPE) plastics, glass, aluminium cans were dumped onto the hardstand area in the southern portion of the site prior to being sorted in large storage bags or bales.</li> <li>• Bales of HDPE plastics were also stored along the western border of the hardstand storage and an open earth strip adjacent to the fence with litter scattered about.</li> <li>• Two drains in the north of the site had been blocked in January 2023. This was directed by the EPA after a diesel spill occurred at the site in January 2022. The block drains are located in a waste receival area and historical runoff would be directed to these points. Given the drains are now blocked, surface runoff is expected to follow natural topography of the site and flow northwards to open earth area.</li> </ul> </li> <li>– Open earth area <ul style="list-style-type: none"> <li>• Scrap metal / machinery and used tyres were temporarily stored at the back of the existing MRF site boundary along the grass area. The site operator indicated the scrap metal would be removed and disposed of offsite while the tyres would be used at a later date for site machinery.</li> <li>• Large cobbles were placed between the hardstand and open earth bale storage area and extended into the bale storage area. These were used for trucks or machinery to clean the tyres.</li> <li>• The open earth bale storage area is scraped down using an excavator bucket on an ad hoc basis.</li> </ul> </li> </ul>

## 2.2 Environmental setting

Information provided in the following section has been obtained from the preliminary site investigation (PSI) (GHD, 2023) and available mapping as referenced in the text below.

### 2.2.1 Topography

The site area varies between 612 – 617 metres (m) Australia Height Datum (AHD), according to topographic data from the Environmental Protection and Sustainable Development Directorate (EPSDD). The regional topography is mostly flat in the southern area with a slight fall from south to north. The western grassy area has a small dip of roughly three metres though this was difficult to discern during the site visit.

### 2.2.2 Soils and landscapes

According to the Atlas of Australian Soils (CSIRO, 2011) the site is within the Williamsdale Landscape. This unit is characterised by Kandosols which are associated with yellow leached earths in intermediate drainage areas and hard neutral and/or alkaline yellow mottled soils in poorly drained areas. Within the one-kilometre site buffer the Disturbed Terrain Landscape is present in the north-west area and the Burra landscape in the northern buffer. Sodosol soils are present in the western area of the report buffer.

According to the Atlas of Australian Acid Sulfate Soils the acid sulphate soils class in the site area is Class C and the works would have an extremely low probability of encountering acid sulphate containing soils (CSIRO, 2011). Approximately 100 m west of the site the soils are Class B soils are present and has a low probability of encountering acid sulphate containing soils.

### 2.2.3 Hydrology

Surface water is expected to follow the local topography and generally flow northwards.

There is a small dam located northern portion of the site, between the creek and the current MRF. Run-off from the site is expected to flow towards this dam and towards Dog Trap Creek based on natural topography.

Drainage from Mugga Lane flows into the site via a culvert in the western edge of the site. This area was observed to be waterlogged. Drainage from this area flows towards the small dam or towards Dog Trap Creek.

There is a natural creek, Dog Trap Creek, located to the north of the site (the closest point being approximately 35 metres) which is a tributary of Jerrabomberra creek and flows from west to east. It is expected that surface water flows from the site, and the small dam, flows into Dog Trap Creek and then branches off into small drainage networks in Gilmore Paddocks. This system is part of the Jerrabomberra Creek Catchment (ACT Government, 2022).

### 2.2.4 Geology

The 1:250,000 scale geological structures map (NSW Department of Industry, Resources & Energy, 2014) indicated the site is situated on Silurian aged Deakin Volcanics – Rhyodacitic ignimbrite and minor volcaniclastic and argillaceous sediments.

### 2.2.5 Hydrogeology

The site and surrounding area located on fractured or fissured, extensive aquifers described to have low to moderate productivity. The site is on Symonston Hydrogeological Landscape (HGL) which is characterised by low land salinity and moderate salt store and mobility.

There are no ACT Government boreholes on site or within the report buffer. There are 32 boreholes owned by the Bureau of Meteorology (BoM) within the report buffer however none within the site boundary. The five closest boreholes are shown in Table 2.

Table 2 BoM five closest boreholes to the site

State Bore ID	Purpose	Depth to GW (m)	Drilled Depth (m)	AHD (m)	Distance from site
620	Unknown*	Unknown*	5.67	619.37	313 m, east
631	Unknown*	Unknown*	4.58	620.39	463 m, east
630	Unknown*	Unknown*	5.17	620.60	558 m, east
604	Unknown*	Unknown*	5.94	632.42	634 m, south
603	Unknown*	Unknown*	4.40	634.30	703 m, south-east
*Information could not be found on BoMs Australian Groundwater Explorer (BoM, 2022)					

## 2.3 Summary of site use and history

The southern portion of the site has been operational as a MRF for 25 years according to client information. It is now primarily used as a waste transfer station since the fire on the 26 December 2022. Based on the review of site history information, the past site activities (i.e. operational MRF) had the potential for contaminating soil, surface water to the north and/or groundwater.

The northern portion of the site has been vacant land since 1944. It is unknown whether the land was used prior to the time. The dam has been located on the site since 1994.

### 3. Preliminary CSM and data gap review

Section 4 of the PSI (GHD, 2023) presents a preliminary conceptual site model (CSM) for groundwater and soils at the site. In order to achieve the objectives of the TSI, a review of existing pertinent data gaps, relevant available data and data required in order to resolve those gaps was undertaken.

Residual data gaps that are of relevance to achieving the project objectives (refer to Section 1.2) are further defined in Table 3. Supplementary data will be required to resolve these gaps, which will be obtained through additional investigations outlined in this SAQP.

**Table 3** Proposed areas for targeted site investigation

Area of potential environmental concern (APEC)	APEC details	Rationale for site investigation (data gaps)
APEC 1	Open earth bale storage area	APEC 1 is a storage area for baled plastics. The area commonly has machinery (excavators and trucks) entering and exiting the vicinity. It is unknown whether the plastics are contaminated given there is no washing of plastics on site currently. Additionally, vehicle in this area have potential to contaminate the ground with hydrocarbons.
APEC 2	Dam	The client has supplied additional information regarding the water quality of the dam in the northern portion of the proposal site. The dam water data will be assessed against relevant guidelines during the data assessment of this TSI. Given that the northern portion of the site including the dam will not be disturbed during the construction of proposal, AEPC 2 is excluded in the scope of TSI.

## 4. Data quality objectives

A process for establishing data quality objectives for a site investigation has been defined in the NEPM *Guideline on Site Characterisation* (NEPM, 2013). The Data Quality Objective (DQOs) process will be applied to the TSI, as described below, to ensure that data collection activities are appropriate and achieve the project objectives. The DQO process involves seven steps as follows:

- Step 1: State the problem
- Step 2: Identify the decision
- Step 3: Identify inputs to the decision
- Step 4: Define the study boundaries
- Step 5: Develop a decision rule
- Step 6: Specify limits on decision errors
- Step 7: Optimise the design for obtaining data

The seven DQO steps for this project are defined in Table 4.

**Table 4** Data quality objectives

Step	Description
Step 1 State the problem	ACT Government are seeking approval for a proposed MRF. The problem is that the potential contamination risks in open earth bale storage area during the proposal and construction works are presently unknown and the following questions need to be answered: <ul style="list-style-type: none"> <li>– What is the likelihood that soil contamination is present on the proposal site that may be encountered during construction works and future use?</li> <li>– If contamination is present, what level of potential risk does it pose to MRF construction workers, future MRF workers and/or ecological receptors?</li> </ul>
Step 2 Identify the decision / goal of the study	The decisions are issues that need to be addressed arising from Step 1. These are: <ul style="list-style-type: none"> <li>– What are potential sources of contamination within the proposal site?</li> <li>– If contamination is present, will the presence of any contamination affect the future use of the site or pose a risk to the identified human receptors?</li> <li>– Do the results of the sampling and analysis indicate potential risk to human health?</li> <li>– Is there a need for further assessment, remediation and/or management?</li> </ul>
Step 3 Identify the information inputs	The inputs to the decision represent the information and data that will be collected as part of the assessment. These include a review of field notes, analytical results and comparison of analytical results with adopted human health and ecological assessment criteria and waste classification guidelines.
Step 4 Define the study boundaries	<i>Define the spatial boundaries of the decision</i> The spatial boundary of the TSI is shown in Figure 1, Appendix A. <i>Define the temporal boundaries of the decision</i> Based upon scheduling, it is anticipated that the fieldwork for the TSI will commence in June to July 2023. <i>Define the scale of decision making</i> The scale of the decision making is limited to the boundaries of the proposal site.
Step 5 Develop decision rules	The key decision rule is - Are contaminants of concern present at concentrations above the adopted assessment criteria? <ul style="list-style-type: none"> <li>– If no, then potential risks to receptors and potential for migration is considered low.</li> <li>– If yes, further assessment or management of the potential risks to potential receptors may be required.</li> </ul>
Step 6	Data generated must be appropriate to allow decisions to be made with confidence. Specific limits for this assessment have been adopted in accordance with the appropriate guidance.

Step	Description
Tolerable limits on decision errors	
Step 7 Optimisation data collection process	This step involves identifying the most resource effective assessment design required to satisfy the DQOs. GHD will use specialist personnel with previous experience in contaminated site assessment to cover all aspects of the assessment.

## 5. Basis for assessment

### 5.1 Relevant guidelines

The framework for the contamination assessment made herein was developed in accordance with the guidelines by the NSW Environment Protection Authority (EPA) under Section 105 of the *Contaminated Land Management Act 1997*. These guidelines include, but are not limited to the following:

- ACT (2019) *Information Sheet 4- Requirements for the reuse and disposal of contaminated soil in the ACT*
- ACT (2020) *Information Sheet 11 – EPA Report Submission Requirements*
- ACT EPA (2021) *Environmental Standards: Assessment and Classification of Liquid and Non-Liquid Wastes*
- ACT Government (2017) *Contaminated Sites Environment Protection Policy – EPA December 2017*
- Heads of the EPAs Australia and New Zealand (HEPA) (2020), *PFAS National Environmental Management Plan (NEMP), Version 2.0*
- NEPC (2013) *National Environmental Protection (Assessment of Site Contamination) Amended Measure (NEPM)*
- NSW EPA (2022) *Contaminated Sites: Sampling Design Guidelines*

GHD will undertake comparison of soil data against appropriate guidelines for the site. The guideline values will be used to evaluate the potential risk of the contamination to human health and the environment.

### 5.2 Contaminants of potential concern

As outlined in the PSI (GHD, 2023), the primary contaminants of potential concern (COPC) associated with the site are the following:

- Asbestos containing material (ACM)
- Heavy metals (including arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc)
- Total recoverable hydrocarbons (TRH)
- Benzene, toluene, ethylbenzene and xylene (BTEX)
- Polycyclic aromatic hydrocarbons (PAH)
- Chlorinated hydrocarbons (CHC)
- Organochlorine pesticides (OCP)
- Organophosphate pesticides (OPP)
- Polychlorinated biphenyls (PCB)
- Per- and poly- fluoroalkyl substances (PFAS)

### 5.3 Adopted assessment criteria

Soil investigation levels for all soil locations have been adopted from assessment criteria presented in in Table 5 below.

Table 5 *Rationale for adopted criteria for soil assessment*

Receptor	Guidelines adopted	Assessment criteria	Rationale
Human health	National Environmental Protection Council, <i>National Environment Protection (Assessment of Site Contamination) Measure (NEPM)</i> (NEPC, 2013)	Presence / absence	Presence or absence of asbestos is considered appropriate for initial screening of asbestos in soil at the proposal site.

Receptor	Guidelines adopted	Assessment criteria	Rationale
	National Environmental Protection Council, <i>National Environment Protection (Assessment of Site Contamination) Measure (NEPM)</i> (NEPC, 2013)	Health screening levels (HSLs)	The NEPM (2013) presents health screening levels (HSLs) for fuel derived petroleum hydrocarbons, which are generic criteria based on a series of reasonably conservative assumptions in order to be protective of human health for a variety of land use types. For the purposes of selecting health-based investigation levels for this study area, industrial/commercial land uses have been adopted.  The NEPM (2013) HSL for fuel derived petroleum products are also adopted as initial screening criteria to assess the potential risk to intrusive maintenance workers in construction trenches and excavations. The HSL were selected because they are more stringent than other IMW published values.
		Health investigation levels (HILs)	For non-petroleum hydrocarbons, the NEPM 2013 HILs have been adopted for commercial industrial purposes. The HILs take into account direct contact pathways, including incidental ingestion and dermal contact.
	PFAS National Environmental Management Plan (NEMP) (HEPA , 2020)	Human health screening value, industrial / commercial (mg/kg)	
Ecology	National Environmental Protection Council, <i>National Environment Protection (Assessment of Site Contamination) Measure (NEPM)</i>	Ecological screening levels (ESLs)	The NEPM (2013) includes EILs for heavy metals and naphthalene and ESLs for petroleum hydrocarbons. The applicability of ESLs and EILs to the investigation area were evaluated. Given that the proposal will be developed to a waste facility with the majority of the proposal site will be hard paved, there are considered to be limited sensitive receptors within the proposal site. The EILs and ESLs have therefore not been adopted for this contamination assessment.
		Ecological investigation levels (EILs)	
	PFAS National Environmental Management Plan (NEMP) (HEPA , 2020)	Ecological indirect exposure (mg/kg)	PFAS NEMP includes ecological screening criteria for PFAS

## **6. Sampling and laboratory analysis program**

### **6.1 Investigation areas**

The sampling design outlined in Table 6 has been informed by the data gap review (Section 3) and the development of DQOs (Section 4). Table 6 below summarises the proposed sampling program, detailing the sampling design, laboratory analysis and contaminants of concern. All proposed sample locations are presented in Figure 2, Appendix A.

Table 6 Proposed soil sampling and analysis program

Area of potential environmental concern (APEC)	Proposed scope of works	Analysis plan	Allowance of samples for analysis	Rationale and outcome of work
APEC 1	<p><b>Soil sampling</b></p> <ul style="list-style-type: none"> <li>- Soil sampling from 6 locations (BH01 to BH06) (see Figure 2, Appendix A)</li> <li>- A powered drilling rig with push tubing (or other methods where required) will be used to a targeted depth of 3.0 metres or half metre into natural soil, which is encountered first.</li> </ul>	<p><b>Number of primary soil samples:</b> Approximately 12 soil samples (2 per location)</p> <p><b>Analysis:</b></p> <ul style="list-style-type: none"> <li>- Asbestos (presence/absence) (in fill soil only)</li> <li>- Heavy Metals (arsenic, Cadmium, chromium, copper, nickel, lead, zinc, mercury)</li> <li>- Total recoverable hydrocarbons (TRH)</li> <li>- Benzene, toluene, ethylbenzene, xylene (BTEX)</li> <li>- Polycyclic aromatic hydrocarbons (PAH)</li> <li>- Chlorinated hydrocarbons (CHC)</li> <li>- Organochlorine and organophosphate pesticides (OCP/OPP/PCB)</li> <li>- Per- and poly- fluoroalkyl substances (PFAS)</li> </ul>	<ul style="list-style-type: none"> <li>- 12 primary samples for metals, TRH, BTEX and PAH.</li> <li>- 6 primary samples for asbestos, CHC, OCP, OPP, PCB and PFAS.</li> <li>- 2 duplicate samples for metals, TRH, BTEX, PAH suite (one inter- and one intra-lab).</li> <li>- 2 duplicate samples for standard PFAS suite (one inter- and one intra-lab).</li> <li>- 1 rinsate and field blank samples for metals and TRH.</li> </ul>	<p>APEC 1 is known to carry out activities which may cause contaminants such as hydrocarbons or PFAS to seep into the soil. BH02 has been selected outside of the APEC based on the drainage line along Mugga Lane. The area is swampy and water from here may be collected from the MRF.</p>

## 6.2 Methodology

### 6.2.1 Health and safety

A task specific Job Safety and Environmental Assessment (JSEA) which will detail hazards, risks and controls with an associated risk matrix, or a Safe Work Method Statement (SWMS) which details the step by step process to undertake the specific task safely, will be developed covering drilling and test pitting works. A copy of this document will be available on site at all times.

### 6.2.2 Underground service clearance

Relevant plans of buried utilities will be obtained from the 'Before You Dig Australia' (BYDA) service and reviewed. In addition, GHD will commission a suitably qualified underground utilities clearance contractor to aid in identifying underground services prior to commencement of works at the locations of all proposed borehole locations.

### 6.2.3 Soil sampling

Soil samples are to be collected by push tube. Hand augering may also be utilised, if the use of the drill is limited due to presence of underground services and/or shallow bedrock

The following soil sampling methodology will be conducted:

- Boreholes will be extended to a maximum depth of 3.0 m bgl or half metre into natural soil whichever is shallower.
- Sampling will be conducted at the surface, 0.5 m bgl, at 1 m bgl and approximate 1 m intervals thereafter until reaching termination depth.
- Soil samples will be collected directly from the tubing using clean nitrile gloves. Clean nitrile gloves will be worn when collecting samples and replaced between samples to prevent cross-contamination.
- All soil samples will be visually inspected, and all field observations and subsurface conditions recorded on field lithological logs, including presence of fill materials and any visual or olfactory indications of contamination.
- GHD will submit samples for analysis as per the sampling program provided in Section 6.
- Unanalysed samples will be retained on-hold for a period of three months in case additional laboratory analysis is required.
- Photographs will be taken of the soil and sampling locations (where possible).
- Boreholes will be reinstated with the spoil generated from the works and the ground surface will be returned to its original state.

## 6.3 Laboratory program

The objective of the analytical program is to gather quantitative data on potential contamination that is of high quality, which is definitive and suitable for comparison against relevant assessment guidelines.

### 6.3.1 Laboratories

The nominated laboratories, which are National Association of Testing Authorities (NATA) accredited for the specific analytical procedures are outlined below:

- Primary laboratory: Eurofins MGT, Girraween, New South Wales
- Secondary laboratory: ALS Environmental, Smithfield, New South Wales

### 6.3.2 Sample handling

Sample handling practices, in accordance with the NEPM (2013) *Schedule B3 Guidelines for the laboratory analysis of potentially contaminated soils* for primary and secondary laboratory are as follows:

- Chain of custody (CoC) signed and dated when the samples arrive at the laboratory.
- Hard copy is filed and stored after login. Electronic copy is filed under unique work order number. A copy of the signed CoC is emailed to GHD along with the sample receipt notification.
- Temperature of samples is recorded at receipt, along with details of chilling and condition of insulated container (i.e., security seals intact). Bench space is allocated per work order so samples cannot be mixed with other work orders.
- Work order is logged and unique sample/jar/bottle waterproof stickers are produced and adhered to containers.
- Samples are organised by sample type and/or preservative.
- Samples are stored below 6°C whilst not being analysed.
- Laboratories follow Good Laboratory Practice to ensure samples are not cross contaminated. The maintenance of clean laboratory equipment and instrumentation is part of these processes.

# 7. Quality assurance / quality control program (QA/QC)

The quality assurance/quality control (QA/QC) procedures are based on NEPM (2013), HEPA (2020) PFAS NEMP. Field QA program involves all of the actions, procedures, checks and decisions undertaken to ensure the representativeness and integrity of samples and accuracy and reliability of analytical results (NEPM 2013). Field QC program involves protocols to monitor and measure the effectiveness of QA procedures.

## 7.1 Field program QA/QC

### 7.1.1 Field quality assurance procedures

All field work will be conducted with reference to the NEPM (2013) and GHD's Standard Field Operating Procedures, which ensures all samples are collected by a set of uniform and systematic methods, as required by GHD's QA system.

Key requirements of these procedures are listed below. Specific requirements for handling PFAS samples to prevent cross-contamination are detailed in HEPA (2020). These requirements will be complied with during sampling:

- **Sampling team:** The sampling team will follow the methodologies presented within Section 6. All field staff involved in sampling will be experienced in their respective fields and considered competent in accordance with GHD's QA system.
- **Sample collection, handling and transport:** Soil samples will be collected using new disposable nitrile gloves for each sample. Specific requirements for handling PFAS samples such as not using water-proofed clothing and having food wrappers on-site, as per the HEPA (2020) guidelines, will be adhered to at all times. Samples will be placed into laboratory provided Teflon-free sample jars and once collected, will be placed on ice (contained in plastic bags) in insulated containers. Samples will be delivered to the laboratory within the recommended holding times for the respective analytes.
- **Sample identification procedures:** Each sample will be labelled with the sample location, date, project identification number and sampler's initials. Sample details will be entered onto a chain of custody (CoC) form that accompanies each batch of samples to the laboratory.
- **CoC information requirements:** A CoC form will be completed and forwarded to the testing laboratory with each batch of samples.
- **Collection of QC samples:** Field QC samples will be collected as detailed in Section 7.1.2.
- **Calibration of field equipment:** Prior to use in the field, all field instruments (i.e. photoionisation detector) will be calibrated by the equipment supplier to optimise the accuracy of the measurements taken.

### 7.1.2 Sampling and analysis quality control

The ASC NEPM (NEPC, 2013) and the PFAS NEMP (HEPA, 2020) outline a recommended approach to QC sampling. The QC samples to be collected during the TSI are described as follows and are included in Table 7.

- **Inter-laboratory duplicate:** Inter-laboratory duplicate / blind duplicate samples are used to identify the variation in the analyte concentration between samples from the same sampling point.
- **Intra-laboratory duplicate:** Intra-laboratory duplicate / split duplicate samples provide an indication of the repeatability of the results between laboratories.
- **Field blanks:** Field blanks are used to estimate contamination of a sample during the collection procedure. Field blanks are collected by pouring laboratory supplied deionised water into laboratory supplied bottles on-site.

- Rinsate blanks: Rinsate blank samples are used to estimate the amount of contamination introduced by the re-use of sampling equipment. They are obtained by pouring laboratory supplied deionised water over decontaminated sampling equipment (e.g. hand auger) into laboratory supplied bottles.

**Table 7** Sampling and analysis QA/QC analytical program

Sample type	Analysis	Rationale	Acceptance criteria
Inter-laboratory duplicate samples	Metals, BTEX, TRH, PAH	One duplicate sample for every 20 samples	0-30%
	Standard PFAS suite	One duplicate sample for every 10 samples	
Intra-laboratory duplicate samples	Metals, BTEX, TRH, PAH	One duplicate sample for every 20 samples	0-30%
	Short PFAS suite	One duplicate sample for every 10 samples	
Field and rinsate blanks	Metals, PAH, short PFAS suite	One field blank and one rinsate blank per day per piece of reusable equipment.	<LOR

In the instance that acceptance criteria listed above are not met, further assessment of the data will be required to determine the impact that this has on the interpretation of the data.

### 7.1.3 Relative percentage difference calculations

Inter- and Intra-laboratory duplicate samples will be assessed by calculating the relative percentage difference (RPD) between the primary, blind and split samples in accordance with the procedure described in AS 4482.1 – 2005 (Standards Australia 2005). Calculation of RPDs provides a quantitative measure of the accuracy of the analytical results reported.

RPD results will be considered acceptable if they are less than or equal to 30%. The only exception to this is when concentrations within the primary and blind or split sample are less than ten times the laboratory LOR. In this case, a greater RPD value is considered acceptable.

## 7.2 Laboratory QA/QC

### 7.2.1 Laboratory analytical programs

Laboratory methods to be used by the primary and secondary laboratories will be suitable for environmental contaminant analysis and are based on established internationally recognised procedures (refer to Section 6.3). Each of the laboratories is NATA accredited for the proposed analysis.

### 7.2.2 Laboratory quality control procedures

The following laboratory QC procedures will be used during the TSI.

#### 7.2.2.1 Laboratory duplicate samples

The analysis of a laboratory derived duplicate sample from the process batch, at a rate equivalent to 1 in 10 samples per analytical batch, or one sample per batch if less than 10 samples are analysed in a batch. A laboratory duplicate provides data on the analytical precision and reproducibility of the analytical results.

The permitted ranges for the RPD of laboratory duplicates are dependent on the magnitude of the results in comparison to the level of reporting as shown in Table 8.

Table 8 Acceptable laboratory RPD ranges

Magnitude of result	Acceptable RPD range
< 10 x limit of reporting (LOR)	No limits
10 - 20 x LOR	0% - 50%
> 20 x LOR	0% - 20%

### 7.2.2.2 Method blank samples

The analysis of a sample that is as free as possible of the analytes of interest but has been prepared the same as the samples under investigation. The analysis is to ascertain if laboratory reagents, glassware and other laboratory consumables contribute to the observed concentration of analytes in the process batch. If below the maximum acceptable method blank (20% of the practical quantitation limit), the contribution is subtracted from the gross analytical signal for each analysis before calculating the sample analyte concentration. The method blank should return analyte concentrations as 'not detected'.

### 7.2.2.3 Laboratory control samples

The analysis of either a reference material or a control matrix fortified with analytes representative of the analyte class. The purpose of laboratory control spike samples is to monitor method precision and accuracy independent of the sample matrix. Typically, the percentage recovery of the laboratory control spike sample is compared to the dynamic recovery limits based on the statistical analysis of the processed laboratory control spike sample analysis. Recoveries should lie between 70% and 130%.

### 7.2.2.4 Matrix spike samples

The analysis of one or more replicate portions of samples from the batch, after fortifying the additional portion(s) with known quantities of the analyte(s) of interest. The percentage recovery of target analyte(s) from matrix spike samples is used to determine the bias of the method in the specific sample matrix. Recoveries should lie between 70% and 130%.

### 7.2.2.5 Surrogate spike samples

Surrogate spike samples are samples with known additions of known amounts of compounds, which are similar to the analytes of interests in terms of extractability, recovery through clean-up procedures and response to chromatographic or other measurement. Surrogate compounds may be alkylated or halogenated analogues or structural isomers of analytes of interest. The purpose of surrogate spikes, which are added immediately before the sample extraction step, is to provide a check for every analysis that no gross processing errors have occurred, which could have led to significant analyte loss or faulty calculation. Recoveries should lie between 50% and 150%.

### 7.2.2.6 Internal standards

Internal standards are known additions of known amounts of compounds which are not found in real samples, will not interfere with quantification of analytes of interest and may be separately and independently quantified. The purpose of internal standards in instrumental techniques is to provide independent signals, which serve to check the consistency of the analytical step. Internal standards are often used for organic compounds and some inorganic compounds.

## 8. Reporting

This SAQP documents the process for the collection and validation of field data as acceptable for use as inputs to the TSI Report.

At the conclusion of this investigation, GHD will provide a targeted site investigation report, which will be prepared in accordance with the requirements of the *ASC NEPM* (NEPC, 2013) and the NSW EPA, *Consultants reporting on contaminated land – Contaminated land guidelines* (2020).

The report will include the details and discussion regarding the outcomes of the investigation detailed in this SAQP. The report will include site location, layout, sampling location, sample exceedance plans and definition of areas requiring remediation/management.

As part of the targeted site investigation report, the following information will also be included:

- Summary of scope of works, site identification, site history summary and preliminary site investigation information.
- Assessment guidelines and criteria.
- Site observations, field sheets and relevant field photographs.
- Summary and discussion of analytical results, laboratory certificates and COPC information.
- Assessment of QA/QC procedures, and compliance/deviation from SAQP.
- Soil field logs.
- Details and outcomes of the TSI investigation.
- GIS figures/maps showing investigation locations and exceedances (if any).
- Summary of updated site CSM.
- Conclusions and recommendations.

The report will be written in a manner consistent with the relevant guidelines.

## 9. References

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# Appendices

# Appendix A

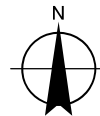
## Figures



- Legend**
- Proposal site
  - Cadastre
  - Watercourses

Paper Size ISO A4  
 0 25 50  
 Metres

Map Projection: Transverse Mercator  
 Horizontal Datum: GDA 1994  
 Grid: GDA 1994 MGA Zone 55



**Transport Canberra and City Services  
 Hume Materials Recovery Facility  
 Sampling Analysis Quality Plan**

Project No. 12540460  
 Revision No. 0  
 Date 15/08/2023

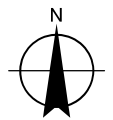
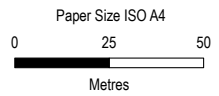
**Proposal Location**

**FIGURE 1**



APEC 1: Open earth bale storage area  
 APEC 2: Dam

- Legend**
- Proposal site
  - Sampling locations
  - Cadastre
  - Watercourses



Map Projection: Transverse Mercator  
 Horizontal Datum: GDA 1994  
 Grid: GDA 1994 MGA Zone 55

Transport Canberra and City Services  
 Hume Materials Recovery Facility  
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**Sampling locations**

**FIGURE 2**



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