

JBS&G 68409-169640

L003 Imported Materials Assessment, Recycled DGB20 – Finucane Reserve (Rev 0)

30 July 2025

Noah Walsh-Gay

Randwick City Council

Via email: noah.walsh-gay@randwick.nsw.gov.au

Material Import Assessment: Recycled DGB20, Finucane Reserve, Matraville, NSW

Dear Noah,

1. Introduction and Background

JBS&G Australia Pty Ltd (JBS&G) was engaged by Randwick City Council (RCC, the client) to undertake characterisation of material proposed to be imported as part of the upgrade works associated with Finucane Reserve, located at 1 Finucane Crescent, Matraville NSW (the site). The material will be used as engineered fill beneath a concrete footpath.

The scope of works comprised a visual inspection and sampling of the material at Gow Street Recycling Centre, located at 81 Gow Street, Padstow, NSW (the source site), in conjunction with a review of the client provided source site material testing, which indicates that the material is a recovered aggregate, as provided in **Attachment B**.

This letter summarises an assessment of crushed concrete/brick material (DGB20) conducted by JBS&G at the source site on 24 July 2025 to assess if the material is suitable, from an environmental perspective, for importation and placement/use at the site in accordance with the Remedial Action Plan (RAP) prepared for the site (JBS&G 2025¹). The limitations included in **Attachment A** apply to the advice provided herein.

2. Objective

The objective of the assessment was to assess whether the materials present at the source site are consistent with recycled DGB20 material (crushed concrete and brick) and met the requirements of the Remedial Action Plan (RAP) (JBS&G 2025) and the recovered aggregate Resource Recovery Order and Exemption (RRO/RRE) (NSW EPA 2014a² and 2014b³).

¹ Remediation Action Plan, Finucane Reserve, 1 Finucane Crescent, Matraville NSW. JBS&G Australia Pty Ltd, dated 25 March 2025, 68409/165,244. (JBS&G 2025);

² The recovered aggregate order 2014, Resource Recovery Order under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 (NSW EPA 2014a);

³ The recovered aggregate exemption 2014, Resource Recovery Order under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 (NSW EPA 2014b);

3. Scope of Work

The scope of work undertaken to achieve the objectives of the assessment include:

- Inspection of material at the source site by one of JBS&G's trained and experienced environmental consultants;
- Review of client provided source site material chemical analysis of the material and other relevant information;
- Collection and analysis of three samples of the DGB20 material; and
- Preparation of a material characterisation report presenting the findings.

4. Material Characterisation

4.1 Source Site Document Review

A waste classification letter with laboratory testing data and a material test report was supplied by the civil contractor and is presented as **Attachment B**.

The waste classification letter describes the material as brown/grey sandy gravel and reported concentrations of heavy metals, foreign materials and asbestos all below the recovered aggregate RRO criteria.

Review of the Gow Street Recycling Centre's environment protection licence (EPL – 10943) states the facility is authorised for resource recovery and waste storage activities. A copy of the facility's EPL is provided in **Attachment B**.

4.2 JBS&G Site Inspection and Sample Collection

Field works were conducted on 24 July 2025 by one of JBS&G's trained and experienced field scientists. The field works comprised a detailed inspection of a stockpile of recycled DGB20 at the source site as indicated by source site personnel. JBS&G collected 3 samples (IMP_DGB20_01 to IMP_DGB20_03) as grab samples from stockpiled material with a new pair of disposable nitrile gloves. In addition, a duplicate and triplicate sample were collected for QA/QC purposes (240725-QC01 and 240725-QA01).

The collected samples were immediately transferred to laboratory supplied sample jars (or zip lock bags for asbestos). The sample containers were transferred to a chilled esky for sample preservation prior to and during shipment to the testing laboratories. Chain-of-custody forms were completed and forwarded with the sampled to the testing laboratories. QA/QC replicate samples were collected to appropriately characterise soil conditions, in addition to the laboratory which completed internal laboratory duplicate analyses for QA/QC. Trip spike and blanks samples were transported and submitted with the primary samples.

Soil samples were submitted to NATA accredited laboratories for the following analyses: heavy metals, TRH, BTEX, PAHs, OCPs, PCBs and asbestos in accordance with the RAP (JBS&G 2025).

5. Results

5.1 Material Description

The material inspected comprised grey/brown sandy gravel, heterogeneous in nature, coarse sand, loose, with inclusions of brick fragments, concrete fragments, sandstone gravels and trace plastic. Photographs of the material are presented in **Attachment C**. No evidence of seepage, staining, odours or asbestos containing materials were observed within the stockpiled material and surrounding areas.

5.2 Soil Assessment Criteria

Analytical results have been compared to NEPC 2013 health investigation/screening levels applicable to public open space (HIL/HSL-C), generic ecological investigation/screening level (EIL/ESL) for urban residential and public open space land use, Management Limits for residential, parkland and public open space land use and resource recovery order (RRO)/ resource recovery exemptions (RRE), as adopted from the RAP (JBS&G 2025) and presented in **Table A, Attachment D**.

5.3 Analytical Results

Laboratory results are presented in **Table A, Attachment D** and laboratory documentation is provided in **Attachment E**.

The analytical results indicated concentrations of common contaminants of concern were below the adopted site criteria and less than the maximum average and absolute maximum concentrations for characterisation consistent with The Recovered Aggregate Order (NSW EPA 2014a).

6. Quality Assurance/Quality Control

An assessment of QA/QC was undertaken as part of this assessment.

The field sampling, inspection and handling procedures produced results which indicated that the data set is of an acceptable quality and suitable for use in material characterisation.

The NATA certified laboratory results indicate that the project laboratories were generally achieving levels of performance within their recommended control limits during the period when the samples from this program were analysed.

On the basis of the results of the field and laboratory QA/QC program, the data set is of an acceptable quality upon which to draw conclusions regarding the usability and reliability in characterising the material.

7. Conclusion

The recycled DGB20 has been assessed for site suitability and meeting the relevant RRO/RRE through review of the client-supplied laboratory testing results, visual inspection, and sampling from the source site, as required by the RAP (JBS&G 2025). Visual inspection by JBS&G at the source site confirmed the presence of recycled DGB20 (grey/brown sandy gravel) consistent with the material described in the supplied documents.

Based on the results of the investigation and subject to the limitations in **Attachment A**, the materials are considered suitable, from an environmental perspective, to be imported to site.

Visual inspection of all imported material by a JBS&G environmental consultant upon delivery at the site will be required to confirm that the appearance is consistent with that described in this letter.

Should you require clarification, please contact Milad Noujaim on 02 8245 0300 or by email mnoujaim@jbsg.com.au.

Yours sincerely:

Reviewed/Approved by:

A handwritten signature in black ink, appearing to read "Andrew Cheok".

Andrew Cheok
Project Consultant
JBS&G Australia Pty Ltd

A handwritten signature in blue ink, appearing to read "Matthew Bennett".

Matthew Bennett
Senior Principal
JBS&G Australia Pty Ltd

Attachments:

- A) Limitations
- B) Client Supplied Documentation
- C) Photographs
- D) Analytical Table
- E) Laboratory reports and COCs

Attachment A Limitations

This report has been prepared for use by the client who has 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 report has been prepared specifically for the client for the purposes of the commission, and 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.

The advice herein relates only to 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 amended in any way without prior approval by JBS&G, or reproduced other than in full including all attachments as originally provided to the client by JBS&G.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements or agreed scope of work.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the 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 investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.

Attachment B Client Supplied Documentation

Coleman Adams Environmental

● Environmental Investigations ● Risk Assessment ● Project Management

PO Box R1370 The Royal Exchange NSW 1225 Sydney

ABN 57 635 464 041

Email: enviro@colemanadams.com.au

Web: www.colemanadams.com.au

Client: Gow Street Recycling Center

Project Number: CAE1243.57

Date: 07/01/2025

Material Classification Certificate

81 Gow Street Padstow NSW

Waste Classification Report			
Site Details			
Address	81 Gow Street Padstow NSW		
Lot Reference	Lot A and 2 DP103140		
Material Information			
Source Location	Material is located within site boundaries, imported from sites across Sydney region. An estimated 1000 tonnes of stockpiled material is proposed to be used as engineered fill.		
Material Identification	The stockpiled soils encountered on site consisted of grey brown sandy gravel (Recycled Concrete).		
Observations	Material sampled was free of foreign materials and signs of contamination. No odours, ACM or other indicators of contamination were detected.		
Samples Collected	Five samples were collected from the stockpile. Sampling method following AS1141 method 3.1.		
Samples Analysed	1243.57.RA01 to 1243.57.RA5		
Sampling Date	17-12-2024	Sampler	MT
Analytes	• Heavy metals; • Conductivity (EC); • Foreign materials; • Asbestos		
Waste Classification	Recovered Aggregate - NSW EPA Recovered Aggregate Order (2014) contaminant guidelines		
Approved by	 M. Tofler Principal LAA001351		

Introduction

Coleman Adams Environmental Pty Ltd was engaged by Gow Street Recycling Center to conduct a visual assessment and chemical analysis of stockpiled material at 81 Gow Street Padstow NSW. (the site).

Objectives

The objective of the investigation was to:

- Obtain representative samples of material proposed to be removed from site;
- Provide a material classification certificate in accordance with NSW EPA Recovered Aggregate Order (2014).

Scope of Work

Coleman Adams scope of work included:

- Desktop assessment of the site;
- Detailed site walkover to identify potential impacted areas;
- Collection of soil samples;
- Analysis of samples by a NATA accredited laboratory;
- Comparison of results obtained against relevant assessment criteria; and
- Preparation of a material classification report.

Desktop Assessment

Contaminated Land Register

A search of the EPA NSW Contaminated Land Register indicates the site is not listed and no listed sites are within the immediate vicinity of the site.

Historical Site Use

Review of aerial photographs has identified the previous land use is industrial and commercial.

Acid Sulfate Soils

A search of the NSW Office of Environment and Heritage Acid Sulfate Soils Risk Mapping indicates the site is in an area of no known occurrence of acid sulfate soils.

Field Observations

The stockpiled material assessed as part of this investigation comprised brown grey sandy gravel. No odours or signs of contamination were observed during the investigation.

Sampling Method and Sample Collection

Five samples were collected using shovel. Samples were collected by hand to assess the stockpiled material. Samples were placed in laboratory prepared Teflon-lined glass jars, with asbestos samples placed in zip lock bags. A minimum of 6kg materials was collected for each sample, for Foreign Material analysis. Sampling was done in accordance with AS1141.3.1.

Samples were placed in a cooler with a target temperature of <4°C, and were sent to a NATA accredited laboratory for analysis. Chain of custody documentation was returned confirming successful receipt of collected samples.

Discussion of Results Obtained

Material Classification

The material assessed is classified Recovered Aggregate as the specific contaminant concentrations are within the Recovered Aggregate Order 2014 contaminant guidelines.

Limitations of This Assessment

CAE has, to the best of our knowledge and based on information provided to us, performed its services for this project in accordance with current industry codes and practices and the information provided is accurate at the date of issue. Opinions and judgements expressed in this report should not be construed as legal opinions or advice, and CAE is not responsible or liable for third-party use or reliance on this report.

Subsurface material can be variable, even over short distances, and the conclusions in this report are based on material observed at specific sampling points. If unexpected finds or material not consistent with this classification is identified, CAE is to be notified immediately.

Reference

<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/waste/rre14-aggregate.pdf?la=en&hash=0F9CB31CA4F663C90EEE81E7D457D0CEBBAE42E0>

<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/waste/rro14-aggregate.pdf?la=en&hash=24FDF5D724F45D65BECDF2BB1AA0791A41B3E6C8>

Typical Soil Profile



Project Number:	CAE1243
Site Address:	81 Gow Street Padstow NSW
Client Name:	Gow Street Recycling Centre

Absolute Maximum Analyte Criteria Aggregate Order 2014	
General Solid Waste	
Restricted Solid Waste	
Hazardous Waste	
Exceeds HIL A	

Waste Classification	Heavy Metals (mg/kg)								Foreign Materials	Electrical Conductivity	Asbestos
	Arsenic As	Cadmium Cd	Chromium Cr	Copper Cu	Lead Pb	Mercury Hg	Nickel Ni	Zinc Zn	%	dS/m	
Absolute Maximum Analyte Criteria Aggregate Order	40	1.5	120	150	150	1.0	80	350	0.3	3.0	Detect/Non-Detect
General Solid Waste	100	20	100	-	100	4	40	-	-	3.0	
Restricted Solid Waste	400	80	400	-	400	16	160	-	-	-	
Hazardous Waste	>2000	>400	>7600	-	>6000	>200	>4200	-	-	-	
Exceeds HIL A	100	20	100	6000	300	40	400	7400	-	-	
Soil Sample ID											
1243.57.RA01	3.0	<0.4	13	27	9.1	<0.1	6.4	34	0	0.11	Non-Detect
1243.57.RA02	<2	<0.4	35	13	<5	<0.1	31	23	0	0.12	Non-Detect
1243.57.RA03	<2	<0.4	9.8	27	<5	<0.1	<5	39	0	0.16	Non-Detect
1243.57.RA04	3.2	<0.4	21	33	8.0	<0.1	6.8	55	0	0.12	Non-Detect
1243.57.RA05	6.2	<0.4	28	20	7.6	<0.1	10	49	0	0.13	Non-Detect