

Remedial Action Plan Task Summary

Project Site:	Drury Development Stage 2 – 64, 68, 108, 120 and 132 Flanagan Road
Scope of Proposed Works	Soil disturbance work associated with bulk earthworks at the site.
Contaminants identified on-site	Concentrations of chromium and lead above naturally occurring background ranges. Concentrations of asbestos below the land use human health criterion.

The provisions of the RAP are mandatory during soil disturbing works for all persons entering the site and all contractor and sub-contractor employees who will be involved in implementing the procedures identified in this document.

Action Required			Actioned	
	, tonon resquired	Ref.	Date	Signature
Pri	or to Work Commencing			
•	Ensure a Contaminated Land Specialist SQEP has been engaged.	1.3		
•	A copy of Appendix 5 is displayed on-site.	6.7		
•	Boundary Controls have been installed.	8.1.1		
•	Sediment control measures have been installed.	8.1.2		
•	Analysis data has been provided to proposed disposal site(s) and written confirmation received from them to confirm they are able to receive the excavated material.	8.1.5		
•	Welfare area set up with appropriate decontamination facilities.	8.1.6 8.4		
•	All workers issued with appropriate PPE and trained in its use.	8.2.2		
•	Source of water is available for dust suppression.	8.3.2		
•	Disposal options for disposal of water have been identified.	8.3.4 8.3.5		
•	Workers have received non-certified training in asbestos identification, safe handling and suitable controls.	8.4 9		
•	All workers have received training in the actions to take if unanticipated ground conditions are encountered.	9		



 A copy of the analytical laboratory test report for any material that is be imported to the site as cleanfill on the basis of direct testing has been provided to the Contaminated Land Specialist SQEP. 				
During Works				
 All workers (staff and contractors) and visitors are inducted with resto the ground conditions on-site, the required PPE, site rules, and accidental discovery procedures. 	spect 8.2.1			
All loads must be securely covered before the truck leaves the site.	8.1.3			
All excavated material being removed from the site is disposed of to appropriately licensed facility.	o an 8.1.5			
 If evidence of unexpected ground conditions is observed, work sha stopped and the Contaminated Land Specialist SQEP contacted to the site to assess the area and take samples as necessary. 				
All imported material complies with Auckland Council definition of 'cleanfill material'.	10			
Documentation to be provided to the Contaminated Land Specialist SQEP				
 Daily site photographs showing the site entrance, the area of work, sediment control measures and any stockpiles. 	10			
A plan showing location(s) where any soil is reused on-site.	10			
Copies of disposal dockets / landfill receipts and confirmation from disposal site that they can accept the material.	10			
Documentation for imported fill.	10			



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Figure 4: 108 Flanagan Road – Historical Fill Extent

Figure 5: 120 Flangan Road – Historical Fill Extent

Appendices

Appendix 1: Aurecon Results Summary

Appendix 2: Results

Appendix 3: Laboratory Transcripts

Appendix 4: Cut Fill Plan

Appendix 5: Remedial Extent and Site Controls

Appendix 6: Asbestos Controls



ENGEO Document Control:

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29/01/2025	Revised to include additional site data	VP	EM	JT
06/03/2025	Revised to include additional discussion on resource consents	VP	EM	DF
20/03/2025	Updated certifying statement	VP	EM	DF



SQEP Certifying Statement

I have read and abide by the Environment Court of New Zealand's Code of Conduct for Expert Witnesses Practice Note 2023.

I certify that the site has been assessed in accordance with current New Zealand Regulations and guidance documents and that this report has been prepared in general accordance with the Ministry for the Environment's Contaminated Land Management Guidelines No. 1: Reporting on Contaminated Sites in New Zealand, 2021.

I am considered by ENGEO Limited to be a suitably qualified and experienced practitioner (SQEP) able to certify reports pursuant to the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, based on the company's definition of a SQEP as given below.

Erika McDonald

Enga B. McDonald

20 March 2025

ENGEO Limited requires that a SQEP has the following Qualifications / Experience:

- Tertiary science or engineering qualification relevant to environmental assessment. Erika has a Master of Science in Civil and Environmental Engineering from Stanford University (2003) and a Bachelor's Degree in Environmental Engineering from the State University of New York at Buffalo (2002).
- A minimum of 10 years of relevant experience. Erika has over 20 years of relevant experience.
- Registration with a professional body that assess and certifies environmental professionals in the
 competency criteria of training, experience, professional conduct and ethical behaviour. Erika is a
 Professional Member of Engineering New Zealand (CMEngNZ) and Professional Engineer in California
 (Civil).



Author's Experience and Qualifications

I, Vincent Pettinger, am an Environmental Scientist at ENGEO. ENGEO is a geotechnical and environmental consultancy with offices in New Zealand, Australia, California and Guam. I have been employed at ENGEO since July 2018.

I hold a Double Major Bachelor of Science in Geography and Geology and a Master of Science in Geology / Geochemistry (with Distinction) from the University of Otago. I am also a full member of the Australasian Land and Groundwater Association (ALGA) and currently sit on the Auckland branch committee. In November 2023, I was confirmed as a Certified Environmental Practitioner (CEnvP) by the CEnvP scheme certification board (registration number 1755).

I have a broad range of contaminated land investigation and remediation experience for a variety of land uses and contaminant profiles for sites in Auckland and across New Zealand.

I confirm that, in my capacity as author of this report, I have read and abide by the Environment Court of New Zealand's Code of Conduct for Expert Witnesses Practice Note 2023.

Vincent Pettinger

20 March 2025



1 Introduction

ENGEO Ltd was requested by Woods Limited to prepare a Remedial Action Plan ('RAP') for soil disturbance activities to be carried out in the Drury Development Stage 2 area (herein referred to as 'the site'; shown on Figure 1). This work has been carried out in accordance with our proposal dated 21 November 2024.

This RAP has been prepared to support the application for a restricted discretionary resource consent under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations 2011 (the 'NESCS').

Further, this RAP includes additional investigation and assessment work to be undertaken in support of a permit for the discharge of contaminants to the environment under The Auckland Unitary Plan, operative in part - 15 November 2016 (the "AUP").¹

Included in this RAP is:

- A summary of previous investigations completed at the site.
- A summary of the investigation works that have and will be undertaken to inform this RAP and the need for a long-term discharge consent under the AUP (AC, 2016).
- Remedial actions for the site based on investigation results.
- An outline of requirements for oversight and validation during and following remedial works.
- An outline of monitoring and management procedures to be implemented during soil disturbing works to assist in:
 - Achieving a safe working environment for relevant personnel.
 - Protecting the environment from contaminants in site discharges during the redevelopment works.
- An outline of actions to be undertaken if unidentified contamination is encountered.

1.1 Relevance

This document has been prepared in general accordance with the Ministry for the Environment's (MfE's) Contaminated Land Management Guidelines No.1 – *Reporting on Contaminated Sites in New Zealand* (2021).

¹ As discussed in Section 5, given the identification of contaminants above environmental discharge criteria in the filled area at 108 Flanagan Road, a long-term discharge consent under the AUP will be required. Investigation and reporting works to support this consent are described in Section 4. The assumption is that the investigation and reporting works will confirm that permitted activity standards E30.6.2.4 will not be met thereby requiring controlled activity consent under Table E30.4.1(A6), or a discretionary activity consent if controlled activity standard E30.6.2.1 is not met.



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The information and recommendations provided herein are to augment the processes on-site and are not intended to relieve any contractor or the controller of the place of work of their responsibility for the health and safety of their workers and contractors.

Nor is it intended to relieve contractors undertaking work on the site of their responsibilities under the Health and Safety at Work Act 2015 and subsequent amendments. It is expected that the contractor will develop a site-specific health and safety plan to complement this document and to address other health and safety requirements that may be applicable to their site works.

The provisions of this RAP are mandatory for all persons entering the site and all contractor and sub-contractor employees who will be involved in implementing the procedures identified in this document.

1.2 Document Review

This RAP is considered suitable to provide controls based on the contamination identified. If contamination is found that varies from what has been assumed in preparing this document, the RAP will need to be updated to account for the changed site understanding. If a revised RAP is prepared, it should be submitted to Auckland Council for review and approval and re-distributed to the project team (Table 1) as soon as practicable following Council's approval of the document.

1.3 Roles and Responsibilities under this RAP

The roles and responsibilities of various organisations under this RAP are listed in Table 1 below.



Table 1: Roles and Responsibilities

Role	Responsibility		
Site Owner Kiwi Property Limited	To distribute this RAP and be responsible for ensuring that the site works are undertaken in accordance with this document and any revisions to this document.		
Site Contractor (main contractor / general earthworks) Ross Reid Contractors Limited	To distribute the RAP (including updated versions) to employees and sub-contractors, and to ensure that the correct copy of the RAP is always available on-site. To provide control and oversight for the ground disturbing works. It is recommended that a designated, suitably trained Site Supervisor is present to oversee the works. This also includes ensuring that all site staff and sub-contractors are aware of and comply with the procedures and health and safety requirements contained within this document. The Site Supervisor should implement changes to site procedures, as necessary, if unanticipated conditions arise. It is anticipated that this Site Supervisor would represent the main site contractor. Should an incident occur on-site which may result in discharges, the Site Supervisor will take control of the situation and coordinate the efforts of all parties on-site to minimise the impact. Worker and public health and safety concerns will take precedence over environmental discharges, should it be unsafe to employ controls or emergency measures immediately. As a minimum, the Site Supervisor should have received non-certified training in asbestos identification, safe handling and suitable controls, to ensure that, if asbestos / asbestos containing materials (ACMs) are encountered they are identified and appropriately managed. Documentary evidence of the training shall be kept on record.		
A Contaminated Land Specialist company with Suitably Qualified and Expractitioners (SQEPs) in contaminated land management shall be appoin with the contractor during the course of the works. Representatives from the Contaminated Land Specialist company shall: Perform the additional investigation (Section 4). Visit the site during remedial works to assess the controls and properties, as they relate to this RAP and to carry out validation work (Section 6). Provide environmental support during site works (if required) are completion report (Section 11).			



2 Previous Investigation Findings

The Stage 2 boundary and its constituent property addresses are shown in attached Figure 1 for reference.

2.1 Geotechnical and Environmental Due Diligence Investigation – 64 Flanagan Road (ENGEO, 2017a)

A due diligence investigation was undertaken to inform potential development considerations at the property. Four hand auger boreholes were advanced to a maximum depth of 4.4 m bgl (indicated on attached Figure 2). Undocumented fill was observed beneath the topsoil to depths ranging from 0.4 m bgl to 1.5 m bgl. Man-made materials (e.g., refuse, building materials) were not noted on the auger logs. Black staining was identified in the matrix of buried gravel in one location and buried, original topsoil was encountered below the fill in two locations in the west of the site. No soil samples were collected for laboratory analysis.

2.2 Geotechnical and Environmental Due Diligence Investigation – 120 Flanagan Road (ENGEO, 2017b)

A due diligence investigation was undertaken to inform potential development considerations at 68 - 132 Flanagan Road. Eleven hand auger boreholes were advanced to a maximum depth of 5 m bgl. Suspected fill was observed at two locations in the northern half of 120 Flanagan Road from the ground surface to depths of 0.7 m bgl and 1.0 m bgl, labelled HA20 and HA21 in attached Figure 3. No man-made materials (e.g., refuse, building materials) or indications of soil contamination (e.g., staining, odours) were noted in the boreholes. No soil samples were collected for laboratory analysis.

2.3 Drury Centre Project – Preliminary Site Investigation (Aurecon, 2020)

Aurecon Limited undertook a Preliminary Site Investigation (PSI) of the greater Drury Metropolitan Centre area owned and controlled by Kiwi Property Limited, to identify current or historical activities / land uses with the potential to cause ground contamination.

The PSI identified several activities that are included on the MfE Hazardous Activities and Industries List (HAIL) (MfE, Revised 2021) including super-phosphate fertiliser storage (Activity A6; 64 Flanagan Road), uncontrolled filling (Activity G5; 64 Flanagan Road and potentially 108 Flanagan Road), and the potential use of asbestos building materials (Activity E1; site wide) in residential dwellings and farm buildings that were built prior to 2000.

2.4 Drury Centre Project – Detailed Site Investigation (Aurecon, 2021)

Aurecon Limited undertook a Detailed Site Investigation (DSI) of the greater Drury Metropolitan Centre area owned and controlled by Kiwi Property Limited, to better quantify the contamination hazard associated with the potentially contaminating activities identified in the PSI. The intrusive investigation comprised six test pits and 13 surface (< 0.2 m bgl) soil sample locations across the Stage 2 area.

The relevant results tables from the Aurecon DSI (2021) are included in Appendix 1. Red boxes have been added to note data applicable to the current site. The balance of data presented is for samples collected from the Stage 1 area or has been remediated and validated.



The soil sampling analytical results showed that:

- Zinc was identified above the AUP Permitted Activity (environmental) criterion in a single sample collected from the southern side of the truck shed in the north of the 64 Flanagan Road property (labelled SS003 on attached Figure 2).
- Logs from the excavator test pits in the historical fill area in the west of the 108 Flanagan Road
 property note that the fill was 'waste bearing' with potential asbestos containing material, bricks,
 metal / steel, glass, plastic and concrete. The investigation locations are shown on attached
 Figure 4. Samples collected from excavator test pits identified the following:
 - Asbestos as asbestos fines (AF) and / or fibrous asbestos (FA) were detected in three samples collected from two locations in the uncontrolled fill material (labelled TP035 and TP036). One sample from 2.1 2.2 metres below ground level (bgl) at TP036 had a combined fibrous asbestos / asbestos fines weight equal to the 'all land use' human health criterion (BRANZ, 2017) of 0.001 % w/w.
 - Nickel was identified above the AUP Permitted Activity (environmental) criterion in fill material at 2.9 – 3.0 m bgl at investigation location TP035.
 - Lead was identified at location TP039 above the AUP Permitted Activity (environmental) criterion in the fill material at 1.6 1.7 m bgl.
- An arsenic concentration exceeding the human health-based criterion (high-density residential)
 was detected in one location near a farm building on the eastern extent of 120 Flanagan Road.
- Lead concentrations exceeding the commercial human health criterion were detected in the surficial soils in the vicinity of the residential dwellings located at 114 Flanagan Road and 108 Flanagan Road which have since been remediated and validated (discussed further in Section 2.5).
- Asbestos as AF and / or FA was detected in a sample of buried waste on the southern side of
 the dwelling at 120 Flanagan Road labelled TP040 on attached Figure 5, collected from
 1.9 2.0 m bgl; a topsoil sample collected from 0.1 0.2 m bgl at location labelled SS005 also
 identified asbestos impacts however, in both instances the concentrations did not exceed the
 laboratory reporting limit or BRANZ human health guidelines.

2.5 Drury Development Stage 2, 64 – 120 Flanagan Road - Site Management Plan (ENGEO, 2024)

ENGEO conducted supplementary soil investigations at 108 and 120 Flanagan Road to inform statutory obligations and appropriate handling and management procedures for lead impacted material around the former dwelling halos and the historical fill identified around a farm building in the ENGEO DD investigation (2017b). The methodology and results of these investigations were reported in a Site Management Plan (SMP) dated 03 April 2024. In summary, surface soils around former residences contained concentrations of lead at concentrations exceeding the AUP Permitted Activity (environmental) criterion and / or the published range of background concentrations. The SMP outlined contamination-related procedures to enact during soil disturbance in "Management Areas", defined as areas with concentrations of lead that exceeded the AUP Permitted Activity (environmental) criterion (250 mg/kg).



Four investigation locations (labelled HA08 – HA11) targeted the historical fill identified in the ENGEO DD investigation (ENGEO, 2017b) at 68 Flanagan Road (shown on attached Figure 3). Topsoil samples were analysed for asbestos (semi-quantitative analysis), heavy metals / metalloids and PAHs.

Asbestos was not identified in the samples analysed, PAHs were not identified above the lower laboratory limit of reporting and heavy metals / metalloids were within published naturally occurring background concentrations (AC, 2016). Samples collected from the historical fill below the topsoil at location HA21 are discussed in Section 2.7.

2.6 Draft – Drury Stage 2 - Site Validation Report

At the time of writing, the lead impacted topsoil material identified in the Aurecon DSI from around the former dwellings at 108 and 120 Flanagan Road has been successfully remediated. A handheld x-ray fluorescence (XRF) was used to delineate the likely extent of exceedances in the field. If XRF readings indicated that remaining material exceeded the AUP Permitted Activity (environmental) criterion for lead, additional removal works were undertaken. To confirm the readings from the XRF analysis, soil samples collected from the base and extents of the excavations were submitted to Hill Laboratories for analysis.

These results will be presented in a Site Validation Report, discussed in Section 11.

Concentrations of lead in localised portions of the remedial areas exceed the range of background concentrations but are considered suitable to remain on-site and do not require specific contaminated soil handling protocols. The project engineer, Glenn Wright of Woods, confirmed to ENGEO that the material identified as being above the published maximum background lead concentration has been removed from site.

2.7 2024 Additional Characterisation

64 Flanagan Road - Undocumented Fill and Fertiliser Storage

ENGEO observed the excavation of seven test pits across the 64 Flanagan Road address. Test pits were excavated until native soil was encountered (maximum depth of 1.7 m bgl). Samples were collected from test pits to characterise the undocumented fill identified in the due diligence investigation (Section 2.1) and soil in the vicinity of the super-phosphate fertiliser storage shed (identified in the Aurecon PSI, Section 2.3). Geotechnical consultancy CMW were jointly involved in this investigation and detailed logs can be found in their Geotechnical Investigation Report (CMW, 2024).

Locations TP01, TP02 and TP03 in the north of the site (Figure 2) had GAP gravel at the surface to approximately 0.3 m below ground level (bgl), which had a brown silty matrix sampled for chemical and asbestos analysis. Below this unit was inferred native East Coast Bays Formation residual soils.

Locations TP05 and TP06 encountered fill material below topsoil which contained mixed refuse including broken glass, iron and plastic. Fragments of corrugated fibre cement tile (suspected to contain asbestos) were encountered at TP05 (shown in Photo 1 below).





Photo 1: Fibre cement fragment ('Super-6' roofing tile)

Investigation location TP04 intersected an unused terracotta stormwater pipe service line surrounded by inferred reworked native East Coast Bays Formation clays to a depth of 0.5 m bgl where it became undisturbed native material.

Location TP07 was not included in the geotechnical scope of works but was included in the investigation as it was in the centre of the retained material behind the former wall and the front of the former dwelling (indicated on Figure 2). The excavation encountered rock fill containing concrete bricks and tiles between the surface and 1.0 m bgl, after which native East Coast Bays Formation was observed.

Collected samples were transported under chain of custody to Hill Laboratories for analysis of contaminants of concern, namely heavy metals / metalloids, polycyclic aromatic hydrocarbons (PAHs) and asbestos (semi-quantitative analysis).

Concentrations of heavy metals / metalloids were elevated above naturally occurring background concentrations in samples collected from the undocumented fill / top of native in three locations, TP02, TP03, TP05. The heavy metal / metalloid remedial criteria presented in Section 6.6 were not exceeded. PAHs were not identified above the laboratory lower limit of reporting for the samples analysed. A results summary table is included as Appendix 2 and laboratory transcripts are included as Appendix 3.

No asbestos was detected in the soil samples analysed for this contaminant. However, the fragments of fibre cement tiles were considered likely to contain asbestos. Controls for earthworks involving asbestos in soil / fill are discussed in Section 7.4.



64 Flanagan Road - Zinc Impacts

Hand tools were used to collect delineation samples from around the area where zinc had been previously identified above the AUP Permitted Activity (environmental) criterion (Section 2.4). Surface soil samples were collected from eight locations (labelled A-G in Figure 2) around the vicinity of 2021 Aurecon sample SS003. Aurecon noted in Table 8 of their DSI (Aurecon, 2021) that the material sampled was 'topsoil.' During the investigation on 27 November 2024, material which may be classified as 'topsoil' was observed at analysed locations marked 'C' and 'E' however 'topsoil' was not observed at other sample locations or at the original SS003 investigation location; rather, the surface material at these locations comprised gravel or clay fill. Two rings of step-out samples were collected from around the location of the original zinc impact. Samples were scheduled in an iterative matter whereby closer samples were scheduled first and if impacts were identified, the second, outer ring was to be analysed.

Soil sample results did not identify zinc above naturally occurring background concentrations (AC, 2016) in the inner ring of samples analysed. Further, a sample collected from the presumed location where Aurecon collected the impacted sample did not replicate the identified zinc impacts. ENGEO considers that topsoil was likely removed from site during clearance of buildings in 2022-2023 and that further assessment and remediation of zinc impacts is not required.

120 Flanagan Road – Historical Fill

ENGEO returned to site on 2 December 2024 to collect a sample of what had been logged as fill during the due diligence investigation (Section 2.2; ENGEO, 2017b). This material is likely to be reworked East Coast Bays formation soil. This reworked material was present between grassed topsoil and undisturbed native material from 0.25 – 0.6 m bgl. A sample was collected from this (named HA21 as it was at the same location; Figure 3) and analysed for common contaminants associated with fill / reworked material, including heavy metals / metalloids, PAHs and asbestos (semi-quantitative analysis).

The sample contained heavy metals / metalloids within naturally occurring background ranges (AC, 2016) and did not contain detectable concentrations of PAHs. No asbestos was identified in this sample. Results are presented in Appendix 2.

No investigation or characterisation is planned to assess this area further.

During the investigation on 2 December 2024, four locations around the former farm dump were targeted to delineate its extent (indicated on attached Figure 5). Samples collected were scheduled for heavy metals / metalloids, PAHs and asbestos (presence / absence) analysis. Note that the laboratory results from the initial sample did not exceed the remedial criteria so delineation sampling was undertaken to inform disposal options of the surrounding material, so has been excluded from discussion of the Conceptual Site Model (Section 2.8). Similarly, a sample of deeper material from location SS005 (shown on Figure 5), where an 'isolated farm shed' had once stood and low-level asbestos impacts were identified at 0.1 - 0.2 m bgl (Section 2.4; Aurecon, 2021). This sample was scheduled for asbestos (presence / absence) analysis. Similarly to the farm dump discussed above, this sampling was intended to inform delineation of low-level impacts as the remedial criteria were not exceeded.



2.8 Contamination Summary

The report(s) and more recent soil testing has identified the following material exceeding the established remedial criteria:

64 Flanagan Road

 Asbestos is present as 'asbestos containing material' above published human health criteria in an area of undocumented fill.

108 Flanagan Road

- Historical fill contains asbestos detected at a concentration equivalent to the human health criterion. Two additional samples from this area contained asbestos below this criterion.
- Heavy metals (nickel and lead) were identified above the AUP Permitted Activity (environmental) criteria from material at two locations in the historical fill area.

2.8.1 Updated Conceptual Site Model

The CSM from the Aurecon DSI (2021) has been updated to account for the remedial works and validation testing as well as the recent intrusive investigation. This is summarised in Table 2. A contamination conceptual site model consists of three primary components. For a contaminant to present a risk to human health or an environmental receptor, all three components are required to be present and connected. The three components of a conceptual site model are:

- Source of contamination.
- An exposure route, where the receptor and contaminants come into contact (e.g., ingestion, inhalation, dermal contact).
- Receptor(s) that may be exposed to the contaminants.



Table 2: Conceptual Site Model

Potential Source of Contamination	Potential Pathway	Potential Receptor	Acceptable Risk?	
64 Flanagan Road Weathering of fertiliser storage building	Soil ingestion, inhalation of dust, and / or dermal contact	Future site users / site redevelopment workers Surrounding residents	Yes Zinc impacted topsoil was likely remediated during removal of site buildings and	
[Zinc]	Leaching of contaminants	Surrounding environment	building materials	
64 Flanagan Road Fertilizer bulk storage	Soil ingestion, inhalation of dust, and / or dermal contact	Future site users / site redevelopment workers Surrounding residents	Yes Concentrations of heavy metals / metalloids were below	
[Heavy metal / metalloids]	Leaching of contaminants	Surrounding environment	relevant remedial criteria	
64 Flanagan Road Historical fill material from unknown source	Soil ingestion, inhalation of dust, and / or dermal contact	Future site users / site redevelopment workers Surrounding residents	No Fragments of asbestos containing fibre cement were identified in undocumented fill	
[Heavy metals / metalloids, PAHs, Asbestos]	Leaching of contaminants	Surrounding environment	Yes Contaminants of heavy metals / metalloids and PAHs were below environmental discharge criteria	
68 Flanagan Road Historical fill material from unknown source	Soil ingestion, inhalation of dust, and / or dermal contact	Future site users / site redevelopment workers Surrounding residents	Yes Contaminants of heavy metals / metalloids and PAHs were	
[Heavy metals / metalloids, PAHs, Asbestos]	Leaching of contaminants	Surrounding environment	below relevant remedial criteria while asbestos was not detected	



Potential Source of Contamination	Potential Pathway	Potential Receptor	Acceptable Risk?
108 Flanagan Road Historical fill material	Soil ingestion, inhalation of dust, and / or dermal contact	Future site users / site redevelopment workers Surrounding residents	Yes The concentration of contaminants of concern were below the human health criteria in the samples analysed
from unknown source [Heavy metals / metalloids, PAHs, Asbestos]	Leaching of contaminants	Surrounding environment	No Concentrations of lead and nickel exceed the environmental discharge criteria in samples from TP039 and TP035, respectively (Figure 4)

3 Proposed Development Works

The site is former pastoral land that is being developed for commercial use. The majority of the development area will be sealed below buildings or paving (e.g., parking, accessways, roads) with some greenspace / landscaped areas including Hingaia Reserve North on the western side of the development area and in a park in the north-eastern area of site. Development works will require soil disturbance to prepare the ground surface, install foundation elements / subsurface utilities, and achieve the final design contours. Cut / fill plans (Appendix 4) indicate 259,136 m³ of earthworks within the Stage 2 boundaries.

The extent of earthworks does not include the area of historical fill at 108 Flanagan Road (indicated on attached Figure 4).

3.1 Summary of Relevant Development Activities

Site Preparation

Site preparation activities include site establishment (i.e., mobilisation, erecting fences, and establishing site security) and set-up of stormwater / silt control measures.

Earthworks

All soil disturbance works including excavations for utility installation, construction of building platforms, and foundation excavations.



4 Additional Investigation Works

4.1 Scope – 108 Flanagan Road

An additional assessment of environmental discharge risks is required for the filled area at this address (Figure 4). Although it is outside of the earthworks area, it is within the project area site boundaries and therefore requires assessment. Given the heavy metal exceedances of environmental discharge criteria, a minimum of four shallow groundwater wells will be installed along the hydraulically downgradient edge of the filled area (western and southern boundaries). Two groundwater monitoring events will be performed – one during summer (dry season, low groundwater table) and one during the winter (wet season, high groundwater table). During these monitoring events a surface water sample will also be collected from the gully area (if feasible). Water samples will be analysed for contaminants exceeding environmental discharge criteria in the fill material, namely heavy metals / metalloids. Results will be compared to ANZECC (2000) criteria based on 80% species protection level for freshwater.

Considering the limited area of the fill, age of the fill and anticipated attenuation of any leaching contaminants from this material, it is likely that Controlled Activity clause E30.6.2.1 (4)(a) or (b) of the AUP will be met. However, this will be confirmed during the groundwater and surface water monitoring discussed above (only investigating overland stormwater at the site boundary if deemed to be required based on the results of the proposed monitoring).

If Controlled Activity clause E30.6.2.1 (4)(a) or (b) cannot be met, discretionary activity consent is required and additional assessment and / or remedial works will be required to address the fill material in this portion of the site. The results of this assessment are not considered to affect the planned development of the site; rather, to inform current site conditions and assess whether some additional controls or monitoring may be required to address discharges from the filled area to the surrounding environment.

4.2 Additional Reporting

The results of the additional water monitoring on 108 Flanagan Road discussed above will be summarised in a letter report for submission to Auckland Council.

If contamination is identified that requires modification to the remedial methodology (e.g. during site works or the additional water monitoring works), an updated version of this RAP or addendum to this RAP will be submitted to Auckland Council outlining the proposed amendments to the remediation methodology required as a result of the findings.

5 Consenting

Due to the exceedances of human health criteria within the earthworks area, this RAP is being submitted to Auckland Council in support of a Restricted Discretionary consent under Section 10 of the NESCS.

Further, given the identification of contaminants above environmental discharge criteria in the filled area at 108 Flanagan Road (Figure 4), a long-term discharge consent under the AUP will be required. Investigation and reporting works to support this consent are described in Section 4. The assumption is that the investigation and reporting works will reveal that a controlled or discretionary activity consent will be required under the AUP.



6 Remedial Works

Remedial earthworks will be necessary to remove the undocumented fill at 64 Flanagan Road which was identified to contain fragments of asbestos containing material (Section 2.7).

Currently, the filled area on 108 Flanagan Road (Figure 4) is not planned to be earthworked. As previously discussed, low-level asbestos (below the human health criterion) and elevated heavy metals (above the environmental discharge criteria) have been detected. The requirement to assess further or remediate this area to address the environmental discharge exceedances will be re-visited following completion of the groundwater monitoring discussed in Section 4.1. No remediation to address the low-level asbestos detections is required. However, even if the groundwater results indicate there is no need to remediate this area of site, the presence of this contamination will need to be identified in a long-term monitoring and management plan to ensure this material is appropriately managed into the future.

Note: An overview of the controls required is included in Appendix 5. It is anticipated that this will be displayed on-site for reference.

6.1 Purpose of Remedial Works

The remedial objective is to mitigate risks to future site users and environmental receptors.

6.2 Remedial Options

The following options have been identified for this site.

Off-site Disposal

Removal of soil from site that has been identified as containing contaminants either above the adopted human health criteria or environmental discharge limits.

Off-site disposal at an appropriately licensed landfill facility permanently removes risk to human health and environmental receptors, and also removes the requirement for long-term management.

Re-use

In some situations (generally when contaminant concentrations are below the human health and environmental guidelines but above regional background concentrations) material can be re-used on-site. If human health or environmental criteria are exceeded, management measures are required (e.g. being placed above the high groundwater table and below pavement / building slab if there is an exceedance of environmental criterial).

To ensure appropriate long-term management of the site, as built drawings should be prepared showing the area of the site where impacted material is placed. This will be accomplished by surveying the area prior to, and post, placement of the soil.



Encapsulation / Capping

This remedial strategy is considered to offer a more sustainable approach and be equally or more protective than disposing of this material at a landfill as it minimises disturbance and transport of contaminated material. A suitable capping layer will be placed where impacted material is proposed to be retained *in situ*.

Groundwater monitoring may be required around areas identified as exceeding the environmental discharge criterion to verify that contamination hasn't impacted groundwater and assess the need for a long-term discharge consent.

To ensure appropriate long-term management of the site, as-built drawings will be prepared. This will be accomplished by surveying the site prior to, and post placement of the capping layer. These drawings will confirm adequate placement of the capping layer and also provide information regarding depth of contaminated materials for future site excavation activities.

6.3 Remedial Strategy

The remedial strategy selected for the identified contamination site is removal of soil that has been identified as containing contaminants above the adopted human health and environmental criteria; namely, the undocumented fill at 64 Flanagan Road (Section 2.7).

The approximate remedial area is shown on the figure in Appendix 5 alongside a summary of controls. This figure also notes the areas of low-level asbestos and heavy metal / metalloid contamination for which some additional contaminated land oversight is required.

At this stage it is assumed that no remedial works will be required for the area of fill on 108 Flanagan Road. Groundwater and surface water monitoring is proposed to confirm that this material can remain *in situ* (refer to Sections 4 and 5).

6.4 Remedial Volume Estimate

The area of asbestos-containing undocumented fill has not been fully identified. The table below provides an approximate area and depth of the fill based on conservative assumptions and site topography. It is recommended that ahead of commencing remedial works, the Contaminated Land Specialist visit the site and advance excavator test pits to confirm the undocumented fill extent. This could also be done as the initial step to the remedial works, as noted in Section 6.5 below.



Remedial Area Sample Exceeding Analyte **Estimated Estimated Estimated Relevant Criteria Exceedance** Area of Vertical Volume Impact (m²) **Extent of** Exceeding Impacted **Remedial Goal** $(m^3)^2$ Material (m bgl) 0.4 - 1.0Undocumented **Direct Observation** Asbestos 350 210 Fill of TP05 (0.6 m thick)

Table 3: Remedial Volume Estimation (based on current dataset)

Notes

6.5 Remedial Methodology

Remedial works shall be completed prior to the bulk topsoil strip to minimise the potential for accidental mixing of impacted soils with non-impacted soils.

Remedial works should be undertaken in accordance with the controls listed in this RAP. During the remedial works, a Contaminated Land Specialist shall be engaged to be on-site for commencement of remedial works to confirm extent of undocumented fill is identified for removal. Additional days on-site may be required depending on timing for removal – the objectives of these visits is to verify that earthworks are being conducted in accordance with the agreed methodology and controls listed within this document, including soil validation sampling.

6.6 Assessment Criteria

Currently the only area being remediated is the undocumented fill at address for asbestos. The remedial criteria for asbestos will be referenced from the New Zealand Guidelines for Assessing and Managing Asbestos in Soil (GAMAS; BRANZ, 2017).

For completeness, the full list of remedial criteria source documents is presented below. These additional documents will be referenced in the event that additional contamination is encountered that requires remediation. In this case, the remedial criteria for the site will be selected from the lesser of the human health and environmental discharge criteria for each contaminant.

6.6.1 Human Health Criteria

The following guidelines were used to provide remedial criteria for future site users:

- The soil contaminant standards from the Methodology for Deriving Contaminants in Soil to Protect Human Health ("the Methodology"; MfE, 2011a) for commercial / industrial land use have been selected based on the anticipated land use.
- The soil guideline values for commercial / industrial land use from the New Zealand Guidelines for Assessing and Managing Asbestos in Soil (GAMAS; BRANZ, 2017).



¹ Vertical and horizontal extent of contamination within native soils has not been specifically assessed. Depth stated is based on the depths of impacted material analysed during the intrusive investigation (ENGEO, 2024).

² Estimated area and volume is likely conservative. Additional sampling can inform this further.

³ Volume estimate based on average depth of fill.

 In accordance with Contaminated Land Management Guidelines No.2 – Hierarchy and Application in New Zealand of Environmental Guideline Values (CLMG 2; MfE, 2011b) for contaminants not listed above.

As discussed in Section 3.2.1 of the *Methodology* (MfE, 2011a), the NESCS does not assess a maintenance or excavation worker exposure scenario as the risks to those workers is more appropriately managed under New Zealand health and safety legislation. Therefore, potential risks to contractors responsible for small scale earthworks are not assessed as part of this investigation. However, the results of this assessment can be used to assist with establishing health and safety procedures and protocols to be implemented during future earthworks.

6.6.2 Environmental Criteria

In the Auckland region, potential discharges to the environment from land containing elevated levels of contaminants are managed through the AUP (AC, 2016). Therefore, the permitted activity criteria in the AUP (Chapter E30 – Contaminated Land) have been adopted as environmental criteria.

6.7 Soil Validation

Soil validation will comprise visual observation for asbestos containing debris within the undocumented fill area of 64 Flanagan Road. Once all observed debris is removed, the sidewalls and base of the remedial excavation will be sampled and tested for asbestos (semi-quantitative analysis). At a minimum, ten soil validation samples will be collected - assumed to comprise six from the sidewalls and four from the base; however, the actual location of validation samples will be decided on based on the shape / extent of the remedial area.

7 Assessment of Environmental Effects

Based on the requirements of Section 88 of the Resource Management Act (RMA, 1991) and the framework set out in the Fourth Schedule of the RMA, the actual and potential environmental effects associated with the proposed works are summarised below (see Table 4).

Asbestos is considered primarily a human health contaminant. The potential adverse effects of asbestos on environmental receptors is not currently understood due to the lack of available research data; as such environmental receptors are not addressed in this risk assessment. Asbestos fibres can, if disturbed in an uncontrolled manner, be transported in the air or stormwater onto other land and so therefore must be controlled.

Mitigation measures (outlined in this document) will be taken to limit stormwater and contaminated soil interaction.



Table 4: Assessment of Environmental Effects

Schedule Four Item	Assessment of Environmental Effects
Description of the proposal.	Resource consent application to excavate and dispose of asbestos impacted material.
Where the activity is likely to result in the significant adverse, a description of the alternatives.	Any actual or potential effects on the environment from the proposed remediation are likely to be minor due to the contaminant properties, site setting, short-term nature of the works and proposed mitigation measures to be employed.
An assessment of actual or potential effects on the environment.	Earthworks shall be conducted in line with consent conditions and mitigation measures discussed herein.
Where the activity includes the discharge of any contaminant, a description of: Nature of the discharge; Sensitivity of the receiving environment; and Alternative methods of discharge.	Potential for remedial works to generate minor amounts of dust during the excavation and removal of impacted material is considered low due to the mitigation measures to be employed. Mitigation will involve dust suppression, limiting drop heights and covering truck loads leaving the remedial area. Stormwater There is considered to be minimal potential for impact on surface water if suitable control measures are implemented. There this unlikely to an significant discharge to air or stormwater during works.
Any effects on ecosystems including plants, or animals, physical disturbances of habitats in the vicinity.	No significant ecological receptors have been identified within close proximity of the site.
Any effect on natural and physical resources having aesthetic, recreational, scientific, historical, spiritual or cultural, or other special values for present or future generations.	No significant effects anticipated.
Description of the mitigation measures (safeguards and contingency plans) where relevant to the undertaken to help prevent or reduce actual or potential effects.	See Section 8 for mitigation measures to be undertaken during remedial works.
Where the scale or significant of the activity's effect are such that monitoring is required, a description of how, once the proposal is approved, effects will be monitored and by whom.	The scale of the proposal is considered minor, however a suitably qualified and experienced practitioner (SQEP) will be engaged to monitor conditions on-site during the remedial works. The Site Supervisor will also qualitatively assess dust during the proposed remedial works.



Discharges from the land are considered highly unlikely to cause significant adverse effects on the environment following site redevelopment works; therefore, it is concluded that the potential environmental effects associated with the proposed programme of remedial works will be less than minor.

8 Site Management Practices and Controls

The site management practices in this section shall be implemented during all ground-disturbing work unless advised otherwise by the Contaminated Land Specialist (e.g., following identification of cleanfill areas on-site through additional testing). Many of the required control measures are standard construction site procedures; however, the relevance and effectiveness of these protocols shall be reviewed by the Site Supervisor on a daily basis during work at the site. Site management practices will change as potential identified impacts are identified or remediated. These will be communicated by the Contaminated Land Specialist prior to removing controls.

8.1 Site Control Procedures

8.1.1 Boundary Controls

Security fencing and appropriate warning signs should be erected around earthworks areas to prevent unauthorised access.

8.1.2 Sediment Control Measures

Appropriate sediment control measures, designed and installed in accordance with Auckland Council Guideline Document GD2016/005: Erosion and sediment control guide for land disturbing activities in the Auckland Region prepared by Beca Ltd and SouthernSkies Environmental for Auckland Council, 2018, shall be implemented to minimise sediment runoff from the site. Minimum controls shall include:

- A stabilised site entrance to minimise the movement of soil off-site.
- Suitable sediment controls (e.g. silt fencing) placed around the perimeter of the works area.
- Protection measures (filter socks, Enviropods etc.) around stormwater drains where there is a potential for runoff.
- Establishment of clean and dirty areas to minimise tracking of potentially impacted soils on and off-site.

8.1.3 Soil Management

During handling of soil in potential remedial area trucks shall be loaded within the area where runoff and possible spills during loading will be controlled and contained. Loads must be securely covered before the truck leaves the site and during transport.

Outside of remedial areas, soil / fill material being disturbed during redevelopment earthworks is suitable to remain on-site.

8.1.4 Stockpiling

Stockpiling of contaminated material shall be avoided. If temporary stockpiling of material is necessary, dust shall be controlled through wetting. If left overnight, or if the use of water is not suitable, the material may need to be covered (e.g., with plastic) and protected by erosion / sediment controls (e.g., bunded).



8.1.5 Off-site Disposal

Soil must be taken to a facility authorised to accept the contaminants present.

Prior to acceptance, the results of the soil testing, as well as Toxicity Characteristic Leaching Procedure (TCLP) testing, may be requested by the receiving facility. Requirements for additional testing and truck lining / soil wrapping should be confirmed with the receiving site.

Soil that needs to be removed from site may comply with the Auckland Council definition of cleanfill material however further testing is required to confirm this.

8.1.6 Decontamination of Equipment

Machinery used when handling impacted soil shall be cleaned of loose soil in a designated 'wash down' area (e.g. paved area or area of existing hardfill) prior to leaving site. Once loose soil has been removed, the cleaned item can be moved to the clean area. Wastewater generated should not be discharged off-site and should be allowed to drain back into the site.

Imported rock / utilised in the 'wash down area' and / or 'truck loading area' (if relevant) should be disposed of as contaminated material, unless tested.

8.2 Health and Safety Protection Measures

8.2.1 General

All contractor staff, sub-contractors and visitors entering or working in the immediate area of the ground disturbing works shall:

- Be inducted before entering the site or commencing work to ensure they are aware of the potential hazards relating to contaminated soil at the site.
- Avoid unnecessary contact with site soils.
- Wash their hands in a dedicated welfare area prior to eating, drinking, vaping or smoking.

Health and safety incidents shall be reported to the main contractor's health and safety advisor, or equivalent responsible person on-site as soon as practicable after the event.

8.2.2 Personal Protective Equipment (PPE)

To minimise the effects of potential contamination exposure via incidental ingestion of soil from future remedial areas, skin contact with soil, the following should be considered over-and-above standard PPE requirements for construction sites (e.g. safety boots):

- Dust mask (if dust is prevalent).
- Work gloves / Coveralls (if contact with soil unavoidable).
- Disposable gloves.
- Overalls rated type 5, category 3.
- Full face visors if wet conditions and splashes may occur.
- Goggles / safety glasses.



8.3 Environmental Management Procedures

8.3.1 General

All environmental incidents (spills, leaks, breaches to sediment control measures etc.) shall be reported to the Site Supervisor as soon as practicable after the incident.

8.3.2 **Dust**

Dust shall be managed in accordance with consent requirements and relevant regulations. The contractor shall consider the following (as appropriate):

- Limit vehicle access onto the excavated areas as far as possible.
- Dampen surface soil using a water truck or portable water sprays. Ensure that the volume of water used does not induce soil erosion, or cause surface ponding or runoff, that could discharge into natural water bodies or stormwater drains.
- Use wind screens or avoid work during windy conditions.
- Consider use of surfactants or polymers or covering soil with polythene where a reliable source
 of water is not available.

In the unlikely event that unsatisfactory dust emissions emanate from the site on a sustained basis, or complaints are received in relation to the works, mitigation of the adverse effects shall be applied in accordance with the hierarchy of control described in the Health and Safety at Work Act 2015 - eliminate the risk, so far as is reasonably practicable; and if it is not reasonably practicable to eliminate a risk, to minimise those risks so far as is reasonably practicable.

If the emission or discharges persist, professional advice shall be sought in order to define appropriate control measures. It is recommended that consultation with appropriate council representatives also be undertaken prior to recommencing works.

8.3.3 Odour

If excavated material is odorous, odour control measures shall be put in place. This could include covering the material with cleanfill, a polythene cover or instituting a deodoriser system.

8.3.4 Stormwater

Uncontrolled discharge of stormwater from areas of ground disturbing activities shall not be permitted. Mitigation of any unexpected discharges (e.g. breaches of sediment control measures) should be implemented immediately. If the on-site erosion and sediment control measures fail, the discharge shall be stopped / minimised as far as practicable by using measures such as hay bales, bunding or excavation of a temporary storage area and a vacuum truck shall be called to site immediately so that the discharge of stormwater from site is eliminated. If such water is to be removed off-site it may be necessary to test the water to identify an appropriate disposal site.

8.3.5 Groundwater

A groundwater assessment was not completed as part of previous investigation(s) at the site (refer Section 0). However, if dewatering is required, or water (surface water or groundwater) has gathered in areas of potential contamination and needs to be removed, it shall be disposed in one of the following ways.



Discharge to Land On-Site

The water may be discharged to land on-site (either directly or after interim storage on-site), provided it complies with the permitted activity standards outlined in Section E4.6.1 and E4.6.2.5 of the AUP (AC, 2016). These controls include restrictions on any changes to colour or visual clarity, odour emissions or effects on aquatic life.

Discharge to Stormwater or Surface Water

Approval shall be sought from Auckland Council prior to discharge to the stormwater or wastewater network.

Note: No free-phase hydrocarbons shall be permitted to be discharged into the stormwater system.

Removal Off-site to an Appropriately Licensed Disposal Facility

An appropriately licensed liquid waste contractor shall be engaged to remove the water using a vacuum truck and to dispose of the water at an appropriately licensed disposal facility. It may be necessary to test the water to identify an appropriate disposal site.

8.4 Controls for Work Involving Asbestos

Asbestos is considered primarily a human health contaminant and hence the objective of the controls for work involving asbestos is to eliminate, as far as reasonably practicable, personal exposure to airborne asbestos on and off-site. Regulation 9(1)(b) of the Health and Safety at Work (Asbestos) Regulations 2016 (HSW(A)R) requires that 'if it is not reasonably practicable to eliminate exposure to airborne asbestos, exposure is minimised so far as is reasonably practicable'. This is achieved through controls such as those described in this section of the RAP.

The scope of works covered by this document includes the excavation, management and disposal of soil impacted with asbestos and the controls have been designed to meet the Safe Work Practices specified in WorkSafe's Approved Code of Practice (herein referred to as 'the ACOP'; 2016), and the Building Research Association of New Zealand (BRANZ) New Zealand Guidelines for Assessing and Managing Asbestos in Soil (NZGAMAS; 2017), including the requirement for the licensed asbestos removalist to prepare an Asbestos Removal Control Plan for all licensed asbestos removal. As the NZGAMAS is referenced in the WorkSafe ACOP, the guideline or higher level of controls are required to be adhered to.

The NZGAMAS introduces varying controls commensurate with the risk level based on the amount of asbestos identified in soil, and if applicable, air.

Given the low concentrations of ACM and / or asbestos fibres detected in soil within the earthworks areas (below 0.001% w/w), and with suitable controls, we anticipate that fibre concentrations within air will not exceed trace levels. Trace level is defined in the HSW(A)R as 'in air, an average concentration of less than 0.01 respirable asbestos fibres per millilitre of air'.

8.4.1 Adopted Asbestos Controls

Due to the presence of asbestos containing cement fragments in the undocumented fill at 64 Flangan Road (Section 2.7), remedial earthworks is considered 'asbestos related works.' This area is indicated on the figure within Appendix 5 – Remedial Extent and Site Controls. Relevant asbestos specific controls are included in Appendix 6



Earthworks in the asbestos-impacted farm dump and isolated farm shed footprint at 120 Flanagan Road is considered 'unlicensed asbestos work' due to the low concentrations of identified asbestos fibres in the soil. Indicated as two green points in Appendix 5.

Additional asbestos controls for other types of work involving asbestos are included in Appendix 6 in the event that additional asbestos impacts are encountered during earthworks.

9 Unanticipated Ground Conditions

Should any unanticipated contaminated material be uncovered during earthworks, works shall stop in that area and a SQEP from the Contaminated Land Specialist company shall be called out to assess the potential risk and advise on what measures should be taken to manage the soil in that area.

Typical indicators of contamination include but are not limited to:

- Buried waste (for example drums or tanks with unknown liquid).
- · Odour (petroleum hydrocarbons, oil).
- Discoloured soil (black, purple, or green staining most common).
- · Asbestos containing materials (ACM) as fragments visible with the naked eye.
- Uncontrolled fill material.

Examples of typical indicators of contamination have been provided in Table 5.



Table 5: Typical Indicators of Contamination

Uncontrolled Filling

Building debris may contain asbestos or other contaminants.





Asbestos Containing Material

Intact sheets or broken into smaller pieces, may be mixed with other material.



Separate-phase Hydrocarbons

Black liquid, odours, sheen



10 Documentation

In order to demonstrate that the requirements of this RAP have been adhered to, the documents listed in Table 6 should be forwarded to the Contaminated Land Specialist company in the timeframes stipulated. These documents will be included in a completion report for the site (discussed in Section 11).



Table 6: Contractor Documentation

Prior to Earthworks Commencing

- Written confirmation from the proposed disposal site(s) confirming that they
 are able to accept material from the site and stating which type of material.
- For any material that is to be imported to the site as cleanfill on the basis of direct testing, a copy of the analytical laboratory test report must be provided prior to transport.

• Daily site photographs showing the site entrance, the area of work, sediment control measures and any stockpiles resulting from the works.

- A site plan showing any areas where site-won material (cleanfill or controlled material only) has been reused.
- **Disposal dockets** for each load of material that is removed from the site. The dockets should contain the following information:
 - Date and time dispatched.
 - Material description.
 - The volume of material in the load.
 - Haulage contractor details (name, address, contact person, contact telephone number).
 - o Truck and trailer registration number.
 - The destination of material.
- Documentation for all imported fill which shall include:
 - o Date and time dispatched.
 - Address of source site.
 - Type and proposed use of material.
 - Weight and / or volume of material carried.
 - Basis for treating the material as cleanfill (e.g., directly tested and confirmed to be cleanfill or virgin excavated natural material (VENM) directly sourced from a licensed quarry).
- Information relating to any incidents or complaints and how these were managed.

Within Two Weeks of Ground Disturbing Works Being Completed (on-site or within an area of site) or on an ongoing basis during works



11 Completion Reporting

A Summary of Works Report or Site Validation Report will likely be required following completion of ground disturbing works. The report shall be prepared in accordance with MfE Contaminated Land Management Guideline No. 1 (2021) by a Contaminated Land Specialist SQEP who has monitored the ground disturbing works on-site. The report shall, as a minimum, include the following information:

- Summary of soil disturbance works on-site and information relating to discovery of additional contamination, or site observations.
- Summary of the remedial works undertaken, including the location and dimensions of the excavations carried out and the volume of soil excavated and / or capping undertaken.
- Documentation relating to the disposal of contaminated soil / fill and used PPE.
- Documentation relating to the importation of cleanfill (if relevant).
- Results of any validation sampling works.
- An assessment indicating whether soils on-site present an unacceptable risk to human health
 or environmental receptors and the need for long term controls or consents. This includes the
 filled area on 108 Flanagan Road, which by this time will have undergone additional
 groundwater and surface water monitoring (refer to Sections 4 and 5).



12 Limitations

- i. We have prepared this report in accordance with the brief as provided. This report has been prepared for the use of our client, Woods Limited, their professional advisers and the relevant Territorial Authorities in relation to the specified project brief described in this report. No liability is accepted for the use of any part of the report for any other purpose or by any other person or entity.
- ii. The recommendations in this report are based on the ground conditions indicated from published sources, site assessments and subsurface investigations described in this report based on accepted normal methods of site investigations. Only a limited amount of information has been collected to meet the specific financial and technical requirements of the client's brief and this report does not purport to completely describe all the site characteristics and properties. The nature and continuity of the ground between test locations has been inferred using experience and judgement and it should be appreciated that actual conditions could vary from the assumed model.
- iii. Subsurface conditions relevant to construction works should be assessed by contractors who can make their own interpretation of the factual data provided. They should perform any additional tests as necessary for their own purposes.
- iv. This Limitation should be read in conjunction with the Engineering NZ/ACENZ Standard Terms of Engagement.
- v. This report is not to be reproduced either wholly or in part without our prior written permission.

We trust that this information meets your current requirements. Please do not hesitate to contact the undersigned on (09) 972 2205 if you require any further information.

Report prepared by

Whaty

Vincent Pettinger, CEnvP

Environmental Scientist

Report reviewed by

Erika McDonald, CMEngNZ

Principal Environmental Engineer

Engaß. McDonald



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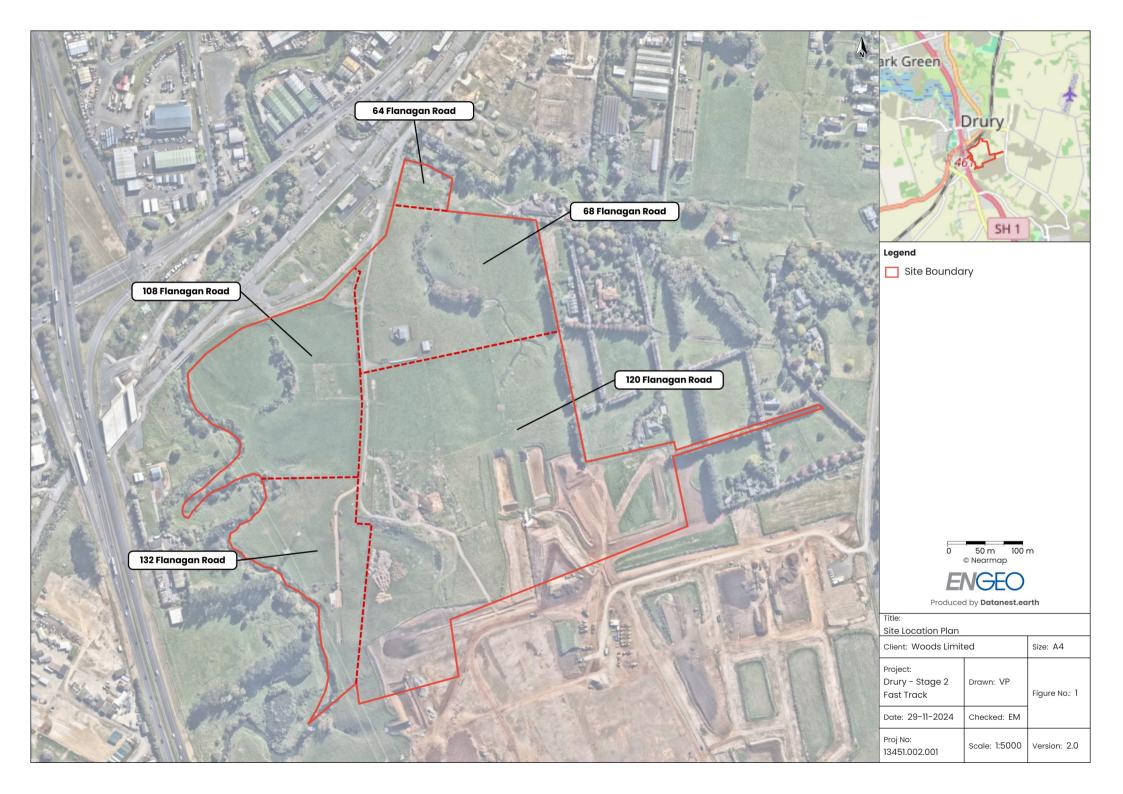
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FIGURES

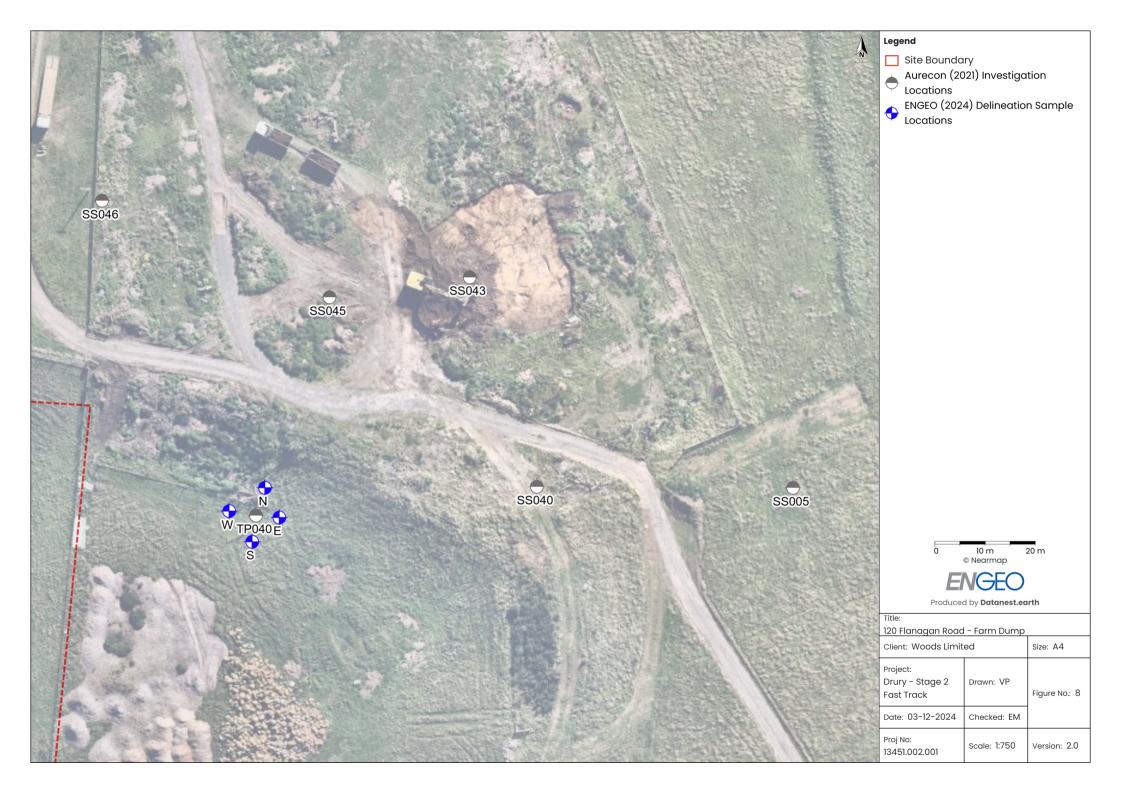














APPENDIX 1:

Aurecon Results Summary





Table E.2 Environmental Soll Results

Project: Drury Precinct DSI Ref: 510611

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Module 4, Tier 1 Residential (SANDY SILT) 0-fm								500 500 3,800**	MINK	900 ₀₃₈₂₈₆₆												
<u> </u>								500813	670*15													
NESCS - High density residential				1,500 ^{#9}	ш	500 F21		ong'c	0001												H	
NESCS - Commercial / Industrial		70	1,300***		10,000 3,3	00																
Number					;	-																
2509315 2 SS001 0.1 2509315 2 SS003 0.1		2 4	22	8 8	37 44	+	56 28	00 00	+	+		0.00	0.016	<0.011	<0.011	<0.011	<0.011	<0.013	<0.011	0.015	0.018 0.016	9 9
		9	<0.10	19	9	H	Н	o.		$\ $	$\ $	<0.3	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	0.012	012 <0.0	12 <0
		4 0	0.38	4 12	\$ 6	29	9 0	200	1	+	+	9 9	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	0.012	0.012	12 2
		7	0.87	19	16	40	8	0				<0.3	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0.013	013 <0.0	13 <0.
		===	0.87	98 8	8 %	99	000	9010		+	+	4.00	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0.013	013 <0.0	13
	0.2 13/01/2021		0.52	2 8	2 22	126	0 6					2.7	0.21	0.067	<0.013	<0.013	<0.013	0.071	0.051	0.21	0.29 0.22	2 0.1
		92 0	0.51	23	92 92	+	+	23		+	+	4.00	<0.014	<0.014	<0.014	<0.014	<0.014	<0.014	<0.014	0.014	014 <0.0	14 00
			0.23	77	2 2		+	. 20				909	<0.014	<0.014	<0.014	<0.014	<0.014	<0.014	0.014	0.014	014 <0.0	7 1 2
		8	0.18	21	22	+	+	7.				40.3	<0.011	<0.011	<0.011	<0.011	<0.011	<0.011	0.011	2011	011 400	11 40,
		5 83	0.53	3 8	\$ 8	-		9 9		1	+	90	0.016	<0.012	<0.013	<0.013	<0.012	<0.012	0.012	0.017	0.019	2 2
		Ę.	0.48	26	88		H	92														
		n e	0.48	43	8 5			2	-			62	3.9	1.49	0.018	0.026	0.022	0.57	0.72	+	+	3 2.5
		19	1.0	92 5	92 0			9.0		\parallel		33	0.21	0.069	<0.016	<0.016	<0.016	0.032		ľ	31 0.23	3 0.1
2509315 2 SS043 0.1-0.2	0.2 18/01/2021	2 F	0.54	2 8	2 88	4,200	14 48	480				8 8	1.37	0.49	<0.012	<0.012	<0.012	0.22	0.194	1.48	2.0 1.61	1 00
		28	0.62	£ 29	20 20	118	+	2 s	+	+		9.0	0.032	<0.014	<0.014	40.014	40.014	40.014	0.014		0.03	38
		14	2.1	98	630	870	14 1,6	20				93	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	2		12
		9 =	0.44	8 2	28 28	40	4 0	2 9	1	+		9 93	0.014	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0023	0.0	9 0
		= ;	0.51	22.5	24	72						03	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0.013	2013 <0,0	13
		£ 60	1,04	3 %	2 82		14 90	00				13	0.061	<0.013	<0.013	<0.013	<0.013	<0.013	0.046	0.075	1049 0.048	900
		6	0.63	25 25	25 92			010				8 63	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0.013 A	013 <0,0	13
		7	0.28	8 8	8 1		Н	00	-			003	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013		013	13 0
		s e	0.38	20	24	_	19 8	9 9	42	0 0	070 <70	0.5	0.031	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012 0	0.036 0	0.046 0.035	35 0.0
		Ę	0.19	18	173	Ì		8								<0.5	<0.5	<0.5	<0.5	H	Н	2
		40	3.7	88	\$ 8	+	+	0 2	0 0	0 -	60	8	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	<0.012	0.012	0.012 <0.01	200
		, _	5.2	28	* *			0.	10	4	7	40.4	<0.014	<0.014	<0.014	<0.014	<0.014	<0.014	40.014			14
		æ ç	0.39	92 8	38	+		0,0	018	0	40 470	0.7	0.045	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0.047	0.042	20 0.0
		47	4.3	41	86		ŀ	07	7 IS	14	0.0	80.	<0.014	<0.014	<0.014	<0.014	<0.014	40.014	50.014	0.014	0.0	14
2509315 2 TP039 316-17	14/01/2021	ω,	1.48	83	92 93		42 1,0	940	1215	25	2 40	80	0.059	0.019	<0.012	<0.012	<0.012	<0.012	<0.012 0	028 0	0.090 0.063	33 0.0
			0.63	- S	23 22	+		9 9	7 10	1	0.2	40.4	<0.014	<0.014	<0.014	<0.014	<0.014	40.00	0.014	0.014	014 <0.0	14 00 2
	15/01/2021	2	40,10	300	32	5.5	Н	6	100	2	01	400	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	0.015	015 <0.0	15 40,
		10 vc	0.24	8 9	18	+	+	9	0 0	3 3	0.00	70	<0.013	<0.013	<0.013	<0.013	<0.013	<0.013	0.013	0.013	0.013	18 0
																					-	

aurecon

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f: 510611	
Ref:	

							Aspestos	stos							
Asbesto soil (<2r	Asbestos in soil (<2mm AFIFA)	<2mm Subsample Weight	As Received Weight	Asbestos as Asbestos Fines as % of Total Sample	Asbestos as Fibrous Asbestos as % of Total Samole	Asbestos in ACM as % of Total Sample	Combined Fibrous Asbestos + Asbestos Fines as % of Total Sample	Drv Matter	Dry Weight	Freon 113	Sample Fraction <10mm to	Sample Fraction	Weight of Asbestos Asbestos as Fibrous Asbestos Asbestos Fibrous Fibrous Fibrous Fibros (Friable)	Weight of Asbestos as Fibrous Asbestos (Friable)	Weight of Asbestos in ACM (Non- Friable)
	g dry wt	g dry wt		M/M %	M/M %		M/M %	g/100g as rcvd	, , ,	mg/kg	g dry wt	g dry wt	g dry wt	g dry wt	g dry wt
BRANZ (2017) - Residential							5								
13/01/2021	347.9	57.6	714.2	<0.001	<0.001	<0.001	<0.001	.	623.0		272.8	<0.1	0.00008	<0.00001	<0.0000
L	293.7	52.8	531.5	<0.001	<0.001	<0.001	<0.001		426.6	ŀ	118.9	13.6	<0.00001	<0.00001	<0.0000
L	182.5	26.0	612.0	<0.001	<0.001	<0.001	<0.001		397.1		213.8	<0.1	<0.00001	<0.00001	.00000"0>
15/01/2021	155.2	59.9	444.7	<0.001	<0.001	<0.001	<0.001		348.8		192.7	<0.1	0.00003	<0.00001	<0.00007
15/01/2021	117.1	56.2	670.5	<0.001	<0.001	<0.001	<0.001		509.3		320.9	70.9	9000000	<0.00001	<0.00001
5/01/2021	232.8	54.6	592.1	<0.001	<0.001	<0.001	<0.001		446.1	•	180.6	31.8	<0.00001	<0.00001	<0.0000
3/01/2021	225.5	52.5	573.6	<0.001	<0.001	<0.001	<0.001		447.6		206.4	15.0	<0.00001	<0.00001	<0.0000
13/01/2021	135.3	55.1	632.9	<0.001	<0.001	<0.001	<0.001		480.4		220.5	124.3	<0.00001	<0.00001	<0.0000
15/01/2021	304.8	0.09	648.0	<0.001	<0.001	<0.001	<0.001		546.4		155.0	85.6	<0.00001	<0.00001	<0.0000
15/01/2021	309.0	59.2	575.9	<0.001	<0.001	<0.001	<0.001	•	425.1	•	109.9	5.6	<0.00001	<0.00001	<0.0000
15/01/2021	280.4	55.1	636.4	<0.001	<0.001	<0.001	<0.001		503.8		206.1	16.1	<0.00001	<0.00001	<0.0000
15/01/2021	1/6./	26.8	450.6	<0.001	<0.001	<0.001	<0.001		289.9		104.5	8.3	<0.00001	<0.00001	<0.00000
15/01/2021	109.0	22.1	300.3	<0.001	<0.001	<0.001	<0.001		2/0.9		30.3	10.2	<0.00001	<0.00001	<0.0000
18/01/2021	338 6	26.0	530.1	<0.001	<0.001	<0.001	<0.001		3016		50 02	2.0	<0.000001	<0.00001	>0.0000
18/01/2021	194.9	51.5	527.3	<0.00	<0.001	<0.001	<0.001		394.0		198.0	<0.1	<0.00001	<0.00001	<0.000.0>
13/01/2021	446.9	56.8	9.692	<0.001	<0.001	<0.001	<0.001		653.8	-	183.0	23.1	<0.00001	<0.00001	<0.0000
15/01/2021	238.7	56.3	553.5	<0.001	<0.001	<0.001	<0.001		414.4		118.0	57.3	<0.00001	<0.00001	<0.0000
15/01/2021	174.8	59.7	687.3	<0.001	<0.001	<0.001	<0.001		545.4		199.2	171.0	<0.00001	<0.00001	<0.0000
15/01/2021	216.8	58.1	652.0	<0.001	<0.001	<0.001	<0.001		499.2		273.6	8.7	<0.00001	<0.00001	<0.00001
13/01/2021	277.6	54.1	605.5	<0.001	<0.001	<0.001	<0.001	•	472.7	•	185.1	9.8	<0.00001	<0.00001	<0.00000
3/01/2021	291.9	56.4	681.2	<0.001	<0.001	<0.001	<0.001		507.1		210.1	2.0	<0.00001	<0.00001	<0.0000
13/01/2021	228.6	57.6	533.0	<0.001	<0.001	<0.001	<0.001		423.8		189.2	5.6	<0.00001	<0.00001	<0.0000
13/01/2021	221.6	57.9	547.7	<0.001	<0.001	<0.001	<0.001		359.0		131.2	0.9	900000	<0.00001	<0.0000
13/01/2021	254.7	52.8	598.6	<0.001	<0.001	<0.001	<0.001		469.3		211.6	3.0	<0.00001	<0.00001	<0.0000
14/01/2021	524.4	58.3	755.6	<0.001	<0.001	<0.001	<0.001		621.4		73.5	23.5	<0.00001	<0.00001	<0.0000
14/01/2021	223.4	57.9	713.2	<0.001	<0.001	0.245	<0.001		569.2		260.5	84.3	0.00288	<0.00001	1.3952
14/01/2021	467.6	0.09	5.899	<0.001	<0.001	<0.001	<0.001		561.0		44.2	48.7	0.00032	<0.00001	<0.0000
14/01/2021	261.1	0 /9	722.3	0.001	<0.001	<0.001	0.001		296.8		229.4	105.1	0.00613	<0.00001	<0.00000
14/01/2021	326.6	52.7	683.8	<0.001	<0.001	<0.001	<0.001		522.3		155.6	38.4	<0.00001	<0.00001	<0.0000
14/01/2021	255.8	58.1	729.8	<0.001	<0.001	<0.001	<0.001		576.4		146.1	172.9	<0.00001	<0.00001	<0.0000
14/01/2021	284.0	58.9	543.8	<0.001	<0.001	<0.001	<0.001		406.1	-	106.5	14.6	<0.00001	<0.00001	<0.0000
14/01/2021	297.2	56.3	596.2	<0.001	<0.001	<0.001	<0.001		470.0		121.3	51.0	<0.00001	<0.00001	<0.0000
15/01/2021	252.3	55.6	712.4	<0.001	<0.001	<0.001	<0.001		518.8	•	246.4	17.8	<0.00001	<0.00001	<0.0000
15/01/2021	258.4	57.6	9.629	<0.001	<0.001	<0.001	<0.001		466.7	<u> </u>	190.3	17.2	0.00135	<0.00001	<0.0000
14/01/2021	431.4	58.4	740.0	<0.001	<0.001	<0.001	<0.001		9.085		138.8	8.5	<0.00001	<0.00001	<0.00000
14/01/2021	2803	57.0	6913	-U U/	1000	1000	7000		1						



APPENDIX 2:

Results



Results Table 1: Soil Results

																				Dolvo	welie Ar	omatic F	hidroca	rhone										
						H	eavy Metal	s / Metalloi	ds					Ponzolo	lnurono T	aviaity E	quivalent (Questions		Folyc	yelle Al	Ulliatic F	iyuroca		ther Debr	cyclic Aro	matia Uw	draaarbau					Asbe (% v	
												_		Benzola	ijpyrene i	OXICITY E	quivalent	auotient			_	_			ther Poly	cyclic Aro	matic Hyd	rocarbon	S				(701	,,,,
				Arsenic	Cadmium	Chromium	Copper	Lead	Mercury	Nickel	Zinc	Benzo[a]anthra cene	Benzo(b&j)fluo anthene	Benzo[k]fluorar thene	Benzo[a]pyrenc	Chrysene	Dibenz[a,h]antl racene	Fluoranthene	Indeno[1,2,3- cd]pyrene	Benzo[a]pyrenc TEQ	Methylnaphtha ene, 1-	Methylnaphtha ene, 2-	Acenaphthene	Acenaphthylen	Anthracene	Benzo[e]pyrenc	Benzo(g,h,i)per ylene	Fluorene	Naphthalene	Perylene	Phenanthrene	Pyrene	Asbestos as ACM	Asbestos as AF/FA
	Hu	man Health Criteria - Co		70	1300	6300 4	10000 5	3300 °	4200 ⁷	6000 *	400000	#N/A	- 9	- *	- 9	- 9	- *	- *	- *	35 10	0.77 11	3000 11	45000 11	NGV 12	2E+05 11	73 11	NGV 12	30000 11	170 ¹³	67 11	50 14	NA 15	0.05 16	0.001 16
		Environmental Disc Background (Auckland	charge Criteria (AUP) 2	100 0.4 - 12	7.5 < 0.1 - 0.65	400 2 - 55	325 1 - 45	250 < 1.5 - 65	0.75 <0.03 - 0.45	105	400	#N/A #N/A	NA °	NA *	NA *	NA *	NA *	NA *	NA 9	20 10	-	-	NGV 12	NGV 12	32 12	-	NGV 12		0.043 17	-	12	1.2 17	-	-
Sample Location	Depth (m bgl)	Generalised Material Type	Date Sampled	0.4 - 12	< 0.1 - 0.05	2 - 55	1 - 45	< 1.5 - 65	<0.03 - 0.45	0.9 - 35	9-100	#N/A	-	-	-	•	-		-	-	•	-	•	-	-	-	•		•	-	•		-	•
TP01	0.0-0.3	Gravel Fill	27-Nov-24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NAD	NAD
TP02	0.0-0.3	Gravel Fill	27-Nov-24	10	2.6	45	124	27	< 0.1	47	182	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.026	< 0.011	< 0.014	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.06	< 0.011	< 0.011	< 0.011	NAD	NAD
TP03	0.0-0.4	Gravel Fill	27-Nov-24	10	0.89	23	46	38	0.13	22	167	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.027	< 0.011	< 0.014	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.06	< 0.011	< 0.011	< 0.011	NAD	NAD
TP04	0.2-0.5	Reworked Native	27-Nov-24	4	0.22	10	12	30	0.11	6	42	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.031	< 0.013	< 0.016	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.07	< 0.013	< 0.013	< 0.013	NAD	NAD
TP05	0.4-1.0	Silty Fill	27-Nov-24	8	0.63	23	28	30	0.16	17	122	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.032	< 0.013	< 0.017	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.07	< 0.013	< 0.013	< 0.013	NAD	NAD
	1.0-1.05	Stained Native	27-Nov-24	6	1.06	21	22	29	< 0.1	16	121	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.028	< 0.012	< 0.015	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.06	< 0.012	< 0.012	< 0.012	-	-
TP06	0.2-1.3	Refuse Fill	27-Nov-24	3	< 0.1	10	11	20	< 0.1	4	30	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.032	< 0.013	< 0.017	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.013	< 0.07	< 0.013	< 0.013	< 0.013	NAD	NAD
TP07	0.0-1.0	Gravel Fill	27-Nov-24	7	0.26	25	25	19.5	0.11	18	83	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.027	< 0.011	< 0.014	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.011	< 0.06	< 0.011	< 0.011	< 0.011	NAD	NAD
SS003 (Aurecon)	0.1-0.2	Topsoil	15-Jan-21	17	2.2	32	37	86	-	50	<u>2500</u>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SS003 (ENGEO)	•	Silty Fill	27-Nov-24	-	-	-	-	-	-	-	57	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SS003A	Surface	Silty Fill	27-Nov-24	-	-	-	-	-	-	-	55	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SS003C	Surface	Silty Fill	27-Nov-24	-	-	-	-	-	-	-	68	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SS003E	Surface	Silty Fill	27-Nov-24	-	-	-	-	-	-	-	72	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SS003G	Surface	Silty Fill	27-Nov-24	-	-	-	-	-	-	-	81	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
HA21	0.25-0.6	Reworked Native	2-Dec-24	7	<0.1	20	26	34	0.29	12	42	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.035	<0.015	<0.03	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	<0.08	<0.015	<0.015	<0.015	NAD	NAD

- Table Notes:

 All results and criteria are presented in milligram per kilogram (mg/kg) on a dry weight basis, except asbestos which is reported as % weight of asbestos / weight of sample (%w/w) Results below Limit of Reporting or exceeding no criteria are shown in grey text
 : not analysed or no applicable criteria
 m bgt: metres below ground level
 ACM: Asbestos Containing Material; AF/FA: Asbestos Fines / Fibrous Asbestos; NAD: No Asbestos Detected

- ACM. Adbasets containing Material; AFFA: Asbestos Fines / Fibrous Asbestos; NAD. No Asbestos Detected

 Cited notes:

 1: Human Health Criteria for Commercial / Industrial Land use selected in general accordance with CLMG No. 2 (ME, 2011). Unless otherwise stated, criteria are from MIE (2011) Methodology for Deriving Standards for Contaminants in Soil to Protect Human Health (Commercial / Industrial Land Use)

 2: Permitted activity standards selected in accordance with Section E30.6.1.4 of the Audistand Charaly Plan (Auckland Council, 2016).

 3: Background Ranges of Trace Elements in Auckland Sois (Auckland Regional Council Technical Publication No. 153 (October, 2001). Background ranges from Table 3 (Non-Victanic Range)

 4: Criterian applies to Crit(V). Consensablely applied to total Critaboratory result

 5: No limit; 1000 mg/lks, consensablely applied to total Critaboratory result

 6: Applies to incrganic reactory only

 8: Australian National Environment Protection (Assessment of Site Contamination) Measure 2013; Health Investigation Levels for 'Commercial / Industrial D' Land Use

 9: Included in Benzel/glaymene Tockicy Equivalency Quoisful contamination presented

 10: Benzel/glaymene Tockicy Equivalency Quoisful contamination presented

 10: Benzel/glaymene Tockicy Equivalency Quoisful contamination of the Protection of Environmental and Human Health (retrieved from online database April, 2024). Criteria for commercial land use

 12: Caudisian Council for Ministers for the Environmental Steals in New Zealand Revised 2011) (ME, 2011). Self Acceptance Criteria for Commercial Indicutes Indicuted value was not calculated in 2010 due to no guideline for soil contact being available, however the guideline for protection of freshwater life was calculated at 0.046 mg/kg.

 15: Guidelines for Assessing and Minanging Petroleum Hydrocarbon Contaminated Steals in New Zealand Revised 2011) (ME, 2011). Criteria for Protection of Groundwater from Table 4.20 Most consensative value for any soil type, and contamination depth.

 16



APPENDIX 3:

Laboratory Transcripts





R J Hill Laboratories Limited 28 Duke Street Frankton 3204 Private Bag 3205 Hamilton 3240 New Zealand ♦ 0508 HILL LAB (44 555 22)
 ♦ +64 7 858 2000
 ☑ mail@hill-labs.co.nz
 ⊕ www.hill-labs.co.nz

Certificate of Analysis

Page 1 of 3

SPv1

Client: Contact: Engeo Limited Erika McDonald C/- Engeo Limited PO Box 305136 Triton Plaza

Auckland 0757

Lab No: Date Received: Date Reported: 3726979 28-Nov-2024 03-Dec-2024 82742

Quote No: Order No:

02142

Client Reference:

13451

Submitted By: Vincent Pettinger

Sample Type: Soil						
S	ample Name:	TP04 0.2-0.5	TP07 0.0-1.0	TP05 0.4-1.0	TP05 1.0-1.05	TP06 0.2-1.3
	Lab Number:	3726979.2	3726979.4	3726979.7	3726979.8	3726979.11
Individual Tests						
Dry Matter	g/100g as rcvd	78	89	76	85	75
Heavy Metals with Mercury, Scr	reen Level					
Total Recoverable Arsenic	mg/kg dry wt	4	7	8	6	3
Total Recoverable Cadmium	mg/kg dry wt	0.22	0.26	0.63	1.06	< 0.10
Total Recoverable Chromium	mg/kg dry wt	10	25	23	21	10
Total Recoverable Copper	mg/kg dry wt	12	25	28	22	11
Total Recoverable Lead	mg/kg dry wt	30	19.5	30	29	20
Total Recoverable Mercury	mg/kg dry wt	0.11	0.11	0.16	< 0.10	< 0.10
Total Recoverable Nickel	mg/kg dry wt	6	18	17	16	4
Total Recoverable Zinc	mg/kg dry wt	42	83	122	121	30
Polycyclic Aromatic Hydrocarbo	ons Screening in S	oil*				
Total of Reported PAHs in Soil	mg/kg dry wt	< 0.4	< 0.3	< 0.4	< 0.3	< 0.4
1-Methylnaphthalene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
2-Methylnaphthalene	mg/kg dry wt	< 0.016	< 0.014	< 0.017	< 0.015	< 0.017
Acenaphthylene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Acenaphthene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Anthracene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Benzo[a]anthracene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Benzo[a]pyrene (BAP)	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Benzo[a]pyrene Potency Equivalency Factor (PEF) NES*	mg/kg dry wt	< 0.031	< 0.027	< 0.032	< 0.028	< 0.032
Benzo[a]pyrene Toxic Equivalence (TEF)*	mg/kg dry wt	< 0.031	< 0.027	< 0.031	< 0.028	< 0.032
Benzo[b]fluoranthene + Benzo[j] fluoranthene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Benzo[e]pyrene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Benzo[g,h,i]perylene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Benzo[k]fluoranthene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Chrysene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Dibenzo[a,h]anthracene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Fluoranthene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Fluorene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Indeno(1,2,3-c,d)pyrene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Naphthalene	mg/kg dry wt	< 0.07	< 0.06	< 0.07	< 0.06	< 0.07
Perylene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Phenanthrene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013
Pyrene	mg/kg dry wt	< 0.013	< 0.011	< 0.013	< 0.012	< 0.013





Sample Type: Soil						
Sa	ample Name:	TP02 0.0-0.3	TP03 0.0-0.4	SS003 0.1-0.2	SS003 A	SS003 C
l	Lab Number:	3726979.15	3726979.17	3726979.20	3726979.21	3726979.23
Individual Tests						
Dry Matter	g/100g as rcvd	91	91	-	-	-
Total Recoverable Zinc	mg/kg dry wt	-	-	57	55	68
Heavy Metals with Mercury, Scre	een Level					
Total Recoverable Arsenic	mg/kg dry wt	10	10	-	-	-
Total Recoverable Cadmium	mg/kg dry wt	2.6	0.89	-	-	-
Total Recoverable Chromium	mg/kg dry wt	45	23	-	-	-
Total Recoverable Copper	mg/kg dry wt	124	46	-	-	-
Total Recoverable Lead	mg/kg dry wt	27	38	-	-	-
Total Recoverable Mercury	mg/kg dry wt	< 0.10	0.13	-	-	-
Total Recoverable Nickel	mg/kg dry wt	47	22	-	-	-
Total Recoverable Zinc	mg/kg dry wt	182	167	-	-	-
Polycyclic Aromatic Hydrocarbon	ns Screening in S	oil*				
Total of Reported PAHs in Soil	mg/kg dry wt	< 0.3	< 0.3	-	-	-
1-Methylnaphthalene	mg/kg dry wt	< 0.011	< 0.011	-	-	_
2-Methylnaphthalene	mg/kg dry wt	< 0.014	< 0.014	-	-	-
Acenaphthylene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Acenaphthene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Anthracene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Benzo[a]anthracene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Benzo[a]pyrene (BAP)	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Benzo[a]pyrene Potency Equivalency Factor (PEF) NES*	mg/kg dry wt	< 0.026	< 0.027	-	-	-
Benzo[a]pyrene Toxic Equivalence (TEF)*	mg/kg dry wt	< 0.026	< 0.027	-	-	-
Benzo[b]fluoranthene + Benzo[j] fluoranthene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Benzo[e]pyrene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Benzo[g,h,i]perylene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Benzo[k]fluoranthene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Chrysene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Dibenzo[a,h]anthracene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Fluoranthene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Fluorene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Indeno(1,2,3-c,d)pyrene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Naphthalene	mg/kg dry wt	< 0.06	< 0.06	-	-	-
Perylene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Phenanthrene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Pyrene	mg/kg dry wt	< 0.011	< 0.011	-	-	-
Ça	mple Name:		SS003 E		SS003 G	.
	Lab Number:	3	3726979.25		3726979.2	
Individual Tests	Las Hallisel.		00. 0.20		3120010.2	
Total Recoverable Zinc	mg/kg dry wt		72		81	
I OLA: INCCOVERABLE ALLIC	mg/kg dry Wt		14		01	

Analyst's Comments

Appendix No.1 - Chain of Custody

Summary of Methods

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively simple matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis. A detection limit range indicates the lowest and highest detection limits in the associated suite of analytes. A full listing of compounds and detection limits are available from the laboratory upon request. Unless otherwise indicated, analyses were performed at Hill Labs, 28 Duke Street, Frankton, Hamilton 3204.

Sample Type: Soil			
Test	Method Description	Default Detection Limit	Sample No
Environmental Solids Sample Drying*	Air dried at 35°C Used for sample preparation. May contain a residual moisture content of 2-5%. (Free water removed before analysis, non-soil objects such as sticks, leaves, grass and stones also removed).	-	2, 4, 7-8, 11, 15, 17, 20-21, 23, 25, 27

Sample Type: Soil			
Test	Method Description	Default Detection Limit	Sample No
Environmental Solids Sample Preparation	Air dried at 35°C and sieved, <2mm fraction. Used for sample preparation May contain a residual moisture content of 2-5%. (Free water removed before analysis, non-soil objects such as sticks, leaves, grass and stones also removed).	-	20-21, 23, 25, 27
Total of Reported PAHs in Soil	Sonication extraction, GC-MS/MS analysis. In-house based on US EPA 8270.	0.03 mg/kg dry wt	2, 4, 7-8, 11, 15, 17
Heavy Metals with Mercury, Screen Level	Dried sample, < 2mm fraction. Nitric/Hydrochloric acid digestion US EPA 200.2. Complies with NES Regulations. ICP-MS screen level, interference removal by Kinetic Energy Discrimination if required.	0.10 - 4 mg/kg dry wt	2, 4, 7-8, 11, 15, 17
Polycyclic Aromatic Hydrocarbons Screening in Soil*	Sonication extraction, GC-MS/MS analysis. Tested on as received sample. In-house based on US EPA 8270.	0.010 - 0.05 mg/kg dry wt	2, 4, 7-8, 11, 15, 17
Dry Matter	Dried at 103°C for 4-22hr (removes 3-5% more water than air dry), gravimetry. (Free water removed before analysis, non-soil objects such as sticks, leaves, grass and stones also removed). US EPA 3550.	0.10 g/100g as rcvd	2, 4, 7-8, 11, 15, 17
Total Recoverable digestion	Nitric / hydrochloric acid digestion. US EPA 200.2.	-	20-21, 23, 25, 27
Total Recoverable Zinc	Dried sample, sieved as specified (if required). Nitric/Hydrochloric acid digestion, ICP-MS, screen level. US EPA 200.2.	4 mg/kg dry wt	20-21, 23, 25, 27
Benzo[a]pyrene Potency Equivalency Factor (PEF) NES*	BaP Potency Equivalence calculated from; Benzo(a)anthracene x 0.1 + Benzo(b)fluoranthene x 0.1 + Benzo(j)fluoranthene x 0.1 + Benzo(k)fluoranthene x 0.1 + Benzo(a)pyrene x 1.0 + Chrysene x 0.01 + Dibenzo(a,h)anthracene x 1.0 + Fluoranthene x 0.01 + Indeno(1,2,3-c,d)pyrene x 0.1. Ministry for the Environment. 2011. Methodology for Deriving Standards for Contaminants in Soil to Protect Human Health. Wellington: Ministry for the Environment.	0.024 mg/kg dry wt	2, 4, 7-8, 11, 15, 17
Benzo[a]pyrene Toxic Equivalence (TEF)*	Benzo[a]pyrene Toxic Equivalence (TEF) calculated from; Benzo[a]pyrene x 1.0 + Benzo(a)anthracene x 0.1 + Benzo(b) fluoranthene x 0.1 + Benzo(k)fluoranthene x 0.1 + Chrysene x 0.01 + Dibenzo(a,h)anthracene x 1.0 + Indeno(1,2,3-c,d)pyrene x 0.1. Guidelines for assessing and managing contaminated gasworks sites in New Zealand (GMG) (MfE, 1997).	0.024 mg/kg dry wt	2, 4, 7-8, 11, 15, 17

These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Testing was completed between 29-Nov-2024 and 03-Dec-2024. For completion dates of individual analyses please contact the laboratory.

Samples are held at the laboratory after reporting for a length of time based on the stability of the samples and analytes being tested (considering any preservation used), and the storage space available. Once the storage period is completed, the samples are discarded unless otherwise agreed with the customer. Extended storage times may incur additional charges.

This certificate of analysis must not be reproduced, except in full, without the written consent of the signatory.

Ara Heron BSc (Tech)

Client Services Manager - Environmental

	Hill	Laborate	ories	ANALYSIS REQUIES Job No: Date Recv: 28-Nov-2411:28 Duke Street Frankton 32(Date Recv: 28-Nov-2411:28
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	ed Sample	Types	and the second s	riol and 25mm cellulose ester membrane, 0.8µm gridded
Soil (s	Ground Wat	er (GW), TCLP Extract obus Wipe (cMiscWpe)	(TCLP), Building Mat	rerial (BM), 25mm cellulose ester membrane, 0.8µm gridded
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R J Hill Laboratories Limited 1/17 Print Place Middleton Christchurch 8024 New Zealand

6 0508 HILL LAB (44 555 22) **%** +64 7 858 2000 mail@hill-labs.co.nz www.hill-labs.co.nz

Certificate of Analysis

Page 1 of 3

A2Pv1

Client: Contact: **Engeo Limited** Erika McDonald PO Box 305136

C/- Engeo Limited Triton Plaza Auckland 0757

Lab No: 3727381 **Date Received:** 28-Nov-2024 **Date Reported:** 03-Dec-2024 **Quote No:**

82742 **Order No:**

Client Reference: 13451

Vincent Pettinger Submitted By:

Sample Type: Soil						
Sample	Name:	TPO4 0.2-0.5 27-Nov-2024	TPO7 0.0-1.0 27-Nov-2024	TPO5 0.4-1.0 27-Nov-2024	TPO6 0.2-1.3 27-Nov-2024	TPO1 0.0-0.3 27-Nov-2024
Lab N	lumber:	3727381.2	3727381.3	3727381.5	3727381.7	3727381.8
Asbestos Presence / Absence		Asbestos NOT detected.				
Description of Asbestos Form		-	-	-	-	-
Asbestos in ACM as % of Total Sample*	% w/w	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Combined Fibrous Asbestos + Asbestos Fines as % of Total Sample*	% w/w	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Asbestos as Fibrous Asbestos as % of Total Sample*	% w/w	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Asbestos as Asbestos Fines as % of Total Sample*	% w/w	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
As Received Weight	g	745.1	876.9	783.8	764.7	707.1
Dry Weight	g	611.6	796.0	633.9	586.7	589.9
Moisture*	%	18	9	19	23	17
Sample Fraction >10mm	g dry wt	71.1	228.6	154.6	16.6	147.1
Sample Fraction <10mm to >2mm	g dry wt	390.3	415.7	311.4	298.2	274.3
Sample Fraction <2mm	g dry wt	149.1	150.5	165.6	270.7	166.6
<2mm Subsample Weight	g dry wt	51.8	59.8	57.3	59.1	50.9
Weight of Asbestos in ACM (Non-Friable)	g dry wt	< 0.00001	< 0.00001	< 0.00001	< 0.00001	< 0.00001
Weight of Asbestos as Fibrous Asbestos (Friable)	g dry wt	< 0.00001	< 0.00001	< 0.00001	< 0.00001	< 0.00001
Weight of Asbestos as Asbestos Fines (Friable)*	g dry wt	< 0.00001	< 0.00001	< 0.00001	< 0.00001	< 0.00001

Sample	Name:	TPO2 0.0-0.3 27-Nov-2024	TPO3 0.0-0.4 27-Nov-2024
Lab N	umber:	3727381.9	3727381.10
Asbestos Presence / Absence		Asbestos NOT detected.	Asbestos NOT detected.
Description of Asbestos Form		-	-
Asbestos in ACM as % of Total Sample*	% w/w	< 0.001	< 0.001
Combined Fibrous Asbestos + Asbestos Fines as % of Total Sample*	% w/w	< 0.001	< 0.001
Asbestos as Fibrous Asbestos as % of Total Sample*	% w/w	< 0.001	< 0.001
Asbestos as Asbestos Fines as % of Total Sample*	% w/w	< 0.001	< 0.001
As Received Weight	g	819.7	898.6
Dry Weight	g	761.0	842.8
Moisture*	%	7	6
Sample Fraction >10mm	g dry wt	248.8	244.8





This Laboratory is accredited by International Accreditation New Zealand (IANZ), which represents New Zealand in the International Laboratory Accreditation Cooperation (ILAC). Through the ILAC Mutual Recognition Arrangement (ILAC-MRA) this accreditation is internationally recognised. The tests reported herein have been performed in accordance with the terms of accreditation, with the exception of tests marked * or any comments and interpretations, which are not accredited.

Sample Type: Soil						
Samp	le Name:	TPO2 0.0-0.3 27-Nov-2024	TPO3 0.0-0.4 27-Nov-2024			
Lab	Number:	3727381.9	3727381.10			
Sample Fraction <10mm to >2mm	g dry wt	384.8	414.0			
Sample Fraction <2mm	g dry wt	126.7	183.2			
<2mm Subsample Weight	g dry wt	58.7	56.2			
Weight of Asbestos in ACM (Non-Friable)	g dry wt	< 0.00001	< 0.00001			
Weight of Asbestos as Fibrous Asbestos (Friable)	g dry wt	< 0.00001	< 0.00001			
Weight of Asbestos as Asbestos Fines (Friable)*	g dry wt	< 0.00001	< 0.00001			

Glossary of Terms

- · Loose fibres (Minor) One or two fibres/fibre bundles identified during analysis by stereo microscope/PLM.
- · Loose fibres (Major) Three or more fibres/fibre bundles identified during analysis by stereo microscope/PLM.
- ACM Debris (Minor) One or two small (<2mm) pieces of material attached to fibres identified during analysis by stereo microscope/PLM.
- ACM Debris (Major) Large (>2mm) piece, or more than three small (<2mm) pieces of material attached to fibres identified during analysis by stereo microscope/PLM.
- Unknown Mineral Fibres Mineral fibres of unknown type detected by polarised light microscopy including dispersion staining. The fibres detected may or may not be asbestos fibres. To confirm the identities, another independent analytical technique may be required.
- Trace Trace levels of asbestos, as defined by AS4964-2004.

For further details, please contact the Asbestos Team.

Please refer to the BRANZ New Zealand Guidelines for Assessing and Managing Asbestos in Soil. https://www.branz.co.nz/asbestos

The following assumptions have been made:

- 1. Asbestos Fines in the <2mm fraction, after homogenisation, is evenly distributed throughout the fraction
- 2. The weight of asbestos in the sample is unaffected by the ashing process.

Results are representative of the sample provided to Hill Laboratories only.

Analyst's Comments

Appendix No.1 - Chain of Custody

Summary of Methods

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively simple matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis. A detection limit range indicates the lowest and highest detection limits in the associated suite of analytes. A full listing of compounds and detection limits are available from the laboratory upon request. Unless otherwise indicated, analyses were performed at Hill Labs, 28 Duke Street, Frankton, Hamilton 3204.

Sample Type: Soil						
Test	Method Description	Default Detection Limit	Sample No			
New Zealand Guidelines Semi Quantit	ative Asbestos in Soil					
As Received Weight	Measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch.	0.1 g	2-3, 5, 7-10			
Dry Weight	Sample dried at 100 to 105°C, measurement on balance. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch.	0.1 g	2-3, 5, 7-10			
Moisture*	Sample dried at 100 to 105°C. Calculation = (As received weight - Dry weight) / as received weight x 100.	1 %	2-3, 5, 7-10			
Sample Fraction >10mm	Sample dried at 100 to 105°C, 10mm sieve, measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch.	0.1 g dry wt	2-3, 5, 7-10			
Sample Fraction <10mm to >2mm	Sample dried at 100 to 105°C, 10mm and 2mm sieve, measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch.	0.1 g dry wt	2-3, 5, 7-10			
Sample Fraction <2mm	Sample dried at 100 to 105°C, 2mm sieve, measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch.	0.1 g dry wt	2-3, 5, 7-10			
Asbestos Presence / Absence	Examination using Low Powered Stereomicroscopy followed by 'Polarised Light Microscopy' including 'Dispersion Staining Techniques'. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch. AS 4964 (2004) - Method for the Qualitative Identification of Asbestos in Bulk Samples.	0.01%	2-3, 5, 7-10			
Description of Asbestos Form	Description of asbestos form and/or shape if present.	-	2-3, 5, 7-10			

Sample Type: Soil						
Test	Method Description	Default Detection Limit	Sample No			
Weight of Asbestos in ACM (Non-Friable)	Measurement on analytical balance, from the >10mm Fraction. Weight of asbestos based on assessment of ACM form. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.00001 g dry wt	2-3, 5, 7-10			
Asbestos in ACM as % of Total Sample*	Calculated from weight of asbestos in ACM and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	2-3, 5, 7-10			
Weight of Asbestos as Fibrous Asbestos (Friable)	Measurement on analytical balance, from the >10mm Fraction. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.00001 g dry wt	2-3, 5, 7-10			
Asbestos as Fibrous Asbestos as % of Total Sample*	Calculated from weight of fibrous asbestos and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	2-3, 5, 7-10			
Weight of Asbestos as Asbestos Fines (Friable)*	Measurement on analytical balance, from the <10mm Fractions. Analysed at Hill Laboratories - Asbestos; Unit 1, 17 Print Place, Middleton, Christchurch. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.00001 g dry wt	2-3, 5, 7-10			
Asbestos as Asbestos Fines as % of Total Sample*	Calculated from weight of asbestos fines and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	2-3, 5, 7-10			
Combined Fibrous Asbestos + Asbestos Fines as % of Total Sample*	Calculated from weight of fibrous asbestos plus asbestos fines and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	2-3, 5, 7-10			

These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Testing was completed on 03-Dec-2024. For completion dates of individual analyses please contact the laboratory.

Samples are held at the laboratory after reporting for a length of time based on the stability of the samples and analytes being tested (considering any preservation used), and the storage space available. Once the storage period is completed, the samples are discarded unless otherwise agreed with the customer. Extended storage times may incur additional charges.

This certificate of analysis must not be reproduced, except in full, without the written consent of the signatory.

John Keneth Paglingayen BApSc Laboratory Technician - Asbestos

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R J Hill Laboratories Limited Ground Fl, 28 Heather Street Parnell Auckland 1052 New Zealand 6 0508 HILL LAB (44 555 22)
 6 +64 7 858 2000
 ✓ mail@hill-labs.co.nz
 ⊕ www.hill-labs.co.nz

# **Certificate of Analysis**

Page 1 of 3

A2Pv1

Client: Enged Contact: Erika

Engeo Limited Erika McDonald C/- Engeo Limited PO Box 305136 Triton Plaza Auckland 0757 Lab No:
Date Received:
Date Reported:
Quote No:

02-Dec-2024 05-Dec-2024 82742

Order No:

*5*21 72

3729920

Client Reference: Submitted By:

13451.002.001 Vincent Pettinger

Sample Type: Soil		
Sample Na	ame:	HA21 0.25-0.6
Lab Num	nber:	3729920.1
Asbestos Presence / Absence		Asbestos NOT detected.
Description of Asbestos Form		-
Asbestos in ACM as % of Total Sample*	% w/w	< 0.001
Combined Fibrous Asbestos + % Asbestos Fines as % of Total Sample*	% w/w	< 0.001
Asbestos as Fibrous Asbestos as % of Total Sample*	% w/w	< 0.001
Asbestos as Asbestos Fines as % of Total Sample*	% w/w	< 0.001
As Received Weight	g	621.2
Dry Weight	g	424.5
Moisture*	%	32
Sample Fraction >10mm* g	dry wt	94.5
Sample Fraction <10mm to >2mm* g	dry wt	250.7
Sample Fraction <2mm* g	dry wt	78.9
<2mm Subsample Weight* g	dry wt	51.5
Weight of Asbestos in ACM (Non-griable)	dry wt	< 0.00001
Weight of Asbestos as Fibrous g Asbestos (Friable)*	dry wt	< 0.00001
Weight of Asbestos as Asbestos g Fines (Friable)*	dry wt	< 0.00001

#### Glossary of Terms

- · Loose fibres (Minor) One or two fibres/fibre bundles identified during analysis by stereo microscope/PLM.
- Loose fibres (Major) Three or more fibres/fibre bundles identified during analysis by stereo microscope/PLM.
- ACM Debris (Minor) One or two small (<2mm) pieces of material attached to fibres identified during analysis by stereo microscope/PLM.
- ACM Debris (Major) Large (>2mm) piece, or more than three small (<2mm) pieces of material attached to fibres identified during analysis by stereo microscope/PLM.
- Unknown Mineral Fibres Mineral fibres of unknown type detected by polarised light microscopy including dispersion staining. The fibres detected may or may not be asbestos fibres. To confirm the identities, another independent analytical technique may be required.
- Trace Trace levels of asbestos, as defined by AS4964-2004.

For further details, please contact the Asbestos Team.

Please refer to the BRANZ New Zealand Guidelines for Assessing and Managing Asbestos in Soil. https://www.branz.co.nz/asbestos

The following assumptions have been made:

- 1. Asbestos Fines in the <2mm fraction, after homogenisation, is evenly distributed throughout the fraction
- 2. The weight of asbestos in the sample is unaffected by the ashing process.

Results are representative of the sample provided to Hill Laboratories only.





### **Analyst's Comments**

Appendix No.1 - Chain of Custody

### **Summary of Methods**

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively simple matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis. A detection limit range indicates the lowest and highest detection limits in the associated suite of analytes. A full listing of compounds and detection limits are available from the laboratory upon request. Unless otherwise indicated, analyses were performed at Hill Labs, 28 Duke Street, Frankton, Hamilton 3204.

Sample Type: Soil			
Test	Method Description	Default Detection Limit	Sample No
New Zealand Guidelines Semi Quantitati	ve Asbestos in Soil		
As Received Weight	Measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	0.1 g	1
Dry Weight	Sample dried at 100 to 105°C, measurement on balance. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	0.1 g	1
Moisture*	Sample dried at 100 to 105°C. Calculation = (As received weight - Dry weight) / as received weight x 100.	1 %	1
Sample Fraction >10mm*	Sample dried at 100 to 105°C, 10mm sieve, measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	0.1 g dry wt	1
Sample Fraction <10mm to >2mm*	Sample dried at 100 to 105°C, 10mm and 2mm sieve, measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	0.1 g dry wt	1
Sample Fraction <2mm*	Sample dried at 100 to 105°C, 2mm sieve, measurement on analytical balance. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland.	0.1 g dry wt	1
Asbestos Presence / Absence	Examination using Low Powered Stereomicroscopy followed by 'Polarised Light Microscopy' including 'Dispersion Staining Techniques'. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland. AS 4964 (2004) - Method for the Qualitative Identification of Asbestos in Bulk Samples.	0.01%	1
Description of Asbestos Form	Description of asbestos form and/or shape if present.	-	1
Weight of Asbestos in ACM (Non-Friable)	Measurement on analytical balance, from the >10mm Fraction. Weight of asbestos based on assessment of ACM form. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.00001 g dry wt	1
Asbestos in ACM as % of Total Sample*	Calculated from weight of asbestos in ACM and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	1
Weight of Asbestos as Fibrous Asbestos (Friable)*	Measurement on analytical balance, from the >10mm Fraction. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.00001 g dry wt	1
Asbestos as Fibrous Asbestos as % of Total Sample*	Calculated from weight of fibrous asbestos and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	1
Weight of Asbestos as Asbestos Fines (Friable)*	Measurement on analytical balance, from the <10mm Fractions. Analysed at Hill Laboratories - Asbestos; 28 Heather Street, Auckland. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.00001 g dry wt	1
Asbestos as Asbestos Fines as % of Total Sample*	Calculated from weight of asbestos fines and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	1
Combined Fibrous Asbestos + Asbestos Fines as % of Total Sample*	Calculated from weight of fibrous asbestos plus asbestos fines and sample dry weight. New Zealand Guidelines for Assessing and Managing Asbestos in Soil, November 2017.	0.001 % w/w	1

These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Testing was completed on 05-Dec-2024. For completion dates of individual analyses please contact the laboratory.

Samples are held at the laboratory after reporting for a length of time based on the stability of the samples and analytes being tested (considering any preservation used), and the storage space available. Once the storage period is completed, the samples are discarded unless otherwise agreed with the customer. Extended storage times may incur additional charges.

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Danielle Carter BSc, PGDipSci, MSc Laboratory Technician - Asbestos

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R J Hill Laboratories Limited 28 Duke Street Frankton 3204 Private Bag 3205 Hamilton 3240 New Zealand

**6 0508 HILL LAB** (44 555 22) **%** +64 7 858 2000 mail@hill-labs.co.nz www.hill-labs.co.nz

# Certificate of Analysis

Page 1 of 2

SPv1

Client: Contact: **Engeo Limited** Erika McDonald C/- Engeo Limited PO Box 305136 Triton Plaza

Auckland 0757

Lab No: **Date Received: Date Reported: Quote No:** 

02-Dec-2024 09-Dec-2024

82742

3730050

**Order No: Client Reference:** Submitted By:

13451.002.001 Vincent Pettinger

		, , ,
Sample Type: Soil		
Sar	mple Name:	HA21 0.25-0.6 02-Dec-2024
	ab Number:	3730050.1
Individual Tests		
Dry Matter	g/100g as rcvd	70
Heavy Metals with Mercury, Scree	en Level	
Total Recoverable Arsenic	mg/kg dry wt	7
Total Recoverable Cadmium	mg/kg dry wt	< 0.10
Total Recoverable Chromium	mg/kg dry wt	20
Total Recoverable Copper	mg/kg dry wt	26
Total Recoverable Lead	mg/kg dry wt	34
Total Recoverable Mercury	mg/kg dry wt	0.29
Total Recoverable Nickel	mg/kg dry wt	12
Total Recoverable Zinc	mg/kg dry wt	42
Polycyclic Aromatic Hydrocarbons	Screening in S	Soil*
Total of Reported PAHs in Soil	mg/kg dry wt	< 0.4
1-Methylnaphthalene	mg/kg dry wt	< 0.015
2-Methylnaphthalene	mg/kg dry wt	< 0.03
Acenaphthylene	mg/kg dry wt	< 0.015
Acenaphthene	mg/kg dry wt	< 0.015
Anthracene	mg/kg dry wt	< 0.015
Benzo[a]anthracene	mg/kg dry wt	< 0.015
Benzo[a]pyrene (BAP)	mg/kg dry wt	< 0.015
Benzo[a]pyrene Potency Equivalency Factor (PEF) NES*	mg/kg dry wt	< 0.035
Benzo[a]pyrene Toxic Equivalence (TEF)*	mg/kg dry wt	< 0.035
Benzo[b]fluoranthene + Benzo[j] fluoranthene	mg/kg dry wt	< 0.015
Benzo[e]pyrene	mg/kg dry wt	< 0.015
Benzo[g,h,i]perylene	mg/kg dry wt	< 0.015
Benzo[k]fluoranthene	mg/kg dry wt	< 0.015
Chrysene	mg/kg dry wt	< 0.015
Dibenzo[a,h]anthracene	mg/kg dry wt	< 0.015
Fluoranthene	mg/kg dry wt	< 0.015
Fluorene	mg/kg dry wt	
Indeno(1,2,3-c,d)pyrene	mg/kg dry wt	< 0.015
Naphthalene	mg/kg dry wt	
Perylene	mg/kg dry wt	< 0.015
Phenanthrene	mg/kg dry wt	< 0.015
Pyrene	mg/kg dry wt	< 0.015





### **Summary of Methods**

The following table(s) gives a brief description of the methods used to conduct the analyses for this job. The detection limits given below are those attainable in a relatively simple matrix. Detection limits may be higher for individual samples should insufficient sample be available, or if the matrix requires that dilutions be performed during analysis. A detection limit range indicates the lowest and highest detection limits in the associated suite of analytes. A full listing of compounds and detection limits are available from the laboratory upon request. Unless otherwise indicated, analyses were performed at Hill Labs, 28 Duke Street, Frankton, Hamilton 3204.

Sample Type: Soil							
Test	Method Description	Default Detection Limit	Sample No				
Environmental Solids Sample Drying*	Air dried at 35°C Used for sample preparation. May contain a residual moisture content of 2-5%. (Free water removed before analysis, non-soil objects such as sticks, leaves, grass and stones also removed).	-	1				
Total of Reported PAHs in Soil	Sonication extraction, GC-MS/MS analysis. In-house based on US EPA 8270.	0.03 mg/kg dry wt	1				
Heavy Metals with Mercury, Screen Level	Dried sample, < 2mm fraction. Nitric/Hydrochloric acid digestion US EPA 200.2. Complies with NES Regulations. ICP-MS screen level, interference removal by Kinetic Energy Discrimination if required.	0.10 - 4 mg/kg dry wt	1				
Polycyclic Aromatic Hydrocarbons Screening in Soil*	Sonication extraction, GC-MS/MS analysis. Tested on as received sample. In-house based on US EPA 8270.	0.010 - 0.05 mg/kg dry wt	1				
Dry Matter	Dried at 103°C for 4-22hr (removes 3-5% more water than air dry), gravimetry. (Free water removed before analysis, non-soil objects such as sticks, leaves, grass and stones also removed). US EPA 3550.	0.10 g/100g as rcvd	1				
Benzo[a]pyrene Potency Equivalency Factor (PEF) NES*	BaP Potency Equivalence calculated from; Benzo(a)anthracene x 0.1 + Benzo(b)fluoranthene x 0.1 + Benzo(j)fluoranthene x 0.1 + Benzo(j)fluoranthene x 0.1 + Benzo(k)fluoranthene x 0.1 + Benzo(a)pyrene x 1.0 + Chrysene x 0.01 + Dibenzo(a,h)anthracene x 1.0 + Fluoranthene x 0.01 + Indeno(1,2,3-c,d)pyrene x 0.1. Ministry for the Environment. 2011. Methodology for Deriving Standards for Contaminants in Soil to Protect Human Health. Wellington: Ministry for the Environment.	0.024 mg/kg dry wt	1				
Benzo[a]pyrene Toxic Equivalence (TEF)*	Benzo[a]pyrene Toxic Equivalence (TEF) calculated from; Benzo[a]pyrene x 1.0 + Benzo(a)anthracene x 0.1 + Benzo(b) fluoranthene x 0.1 + Benzo(k)fluoranthene x 0.1 + Chrysene x 0.01 + Dibenzo(a,h)anthracene x 1.0 + Indeno(1,2,3-c,d)pyrene x 0.1. Guidelines for assessing and managing contaminated gasworks sites in New Zealand (GMG) (MfE, 1997).	0.024 mg/kg dry wt	1				

These samples were collected by yourselves (or your agent) and analysed as received at the laboratory.

Testing was completed between 05-Dec-2024 and 09-Dec-2024. For completion dates of individual analyses please contact the laboratory.

Samples are held at the laboratory after reporting for a length of time based on the stability of the samples and analytes being tested (considering any preservation used), and the storage space available. Once the storage period is completed, the samples are discarded unless otherwise agreed with the customer. Extended storage times may incur additional charges.

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Human

Kim Harrison MSc

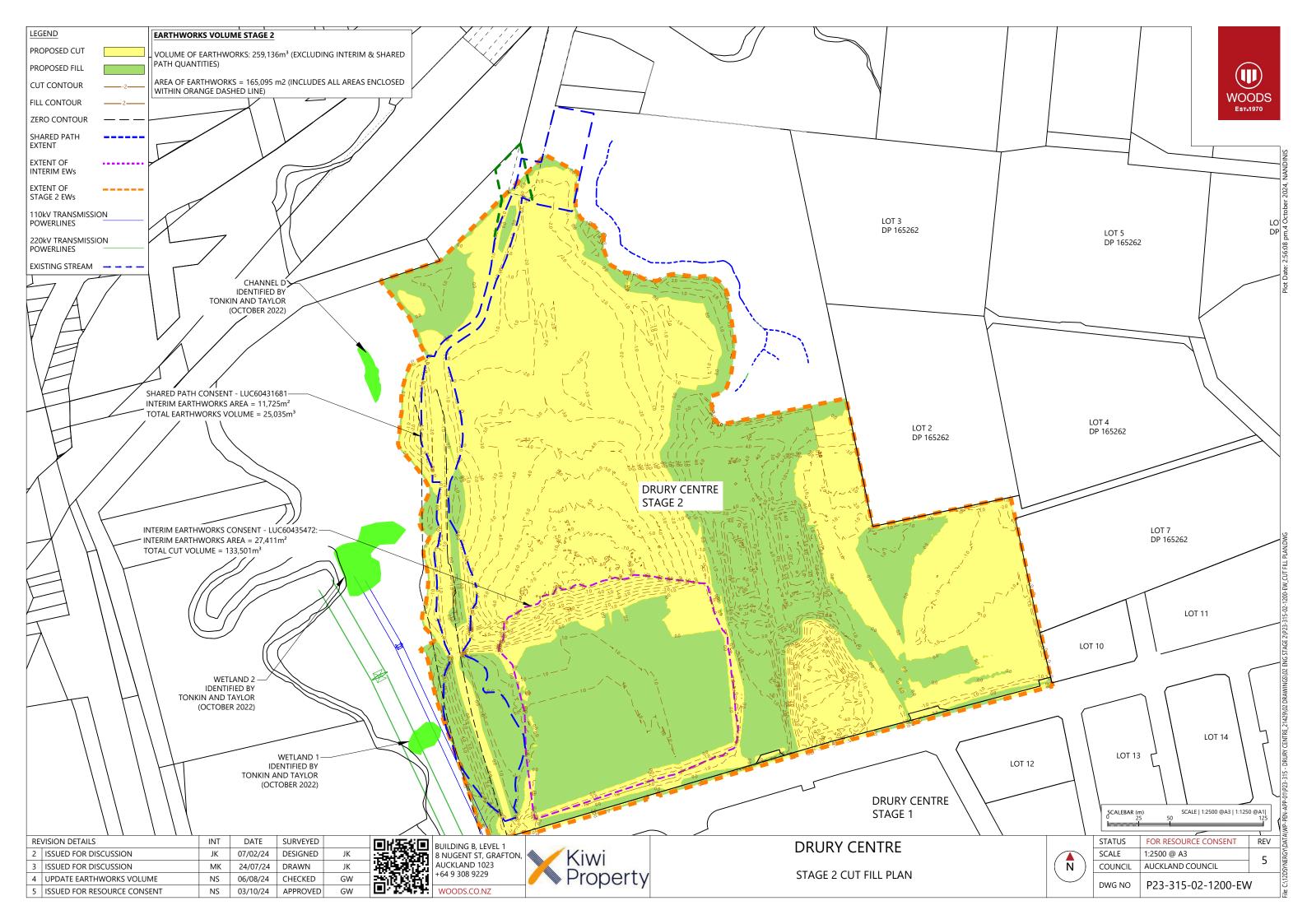
Client Services Manager - Environmental

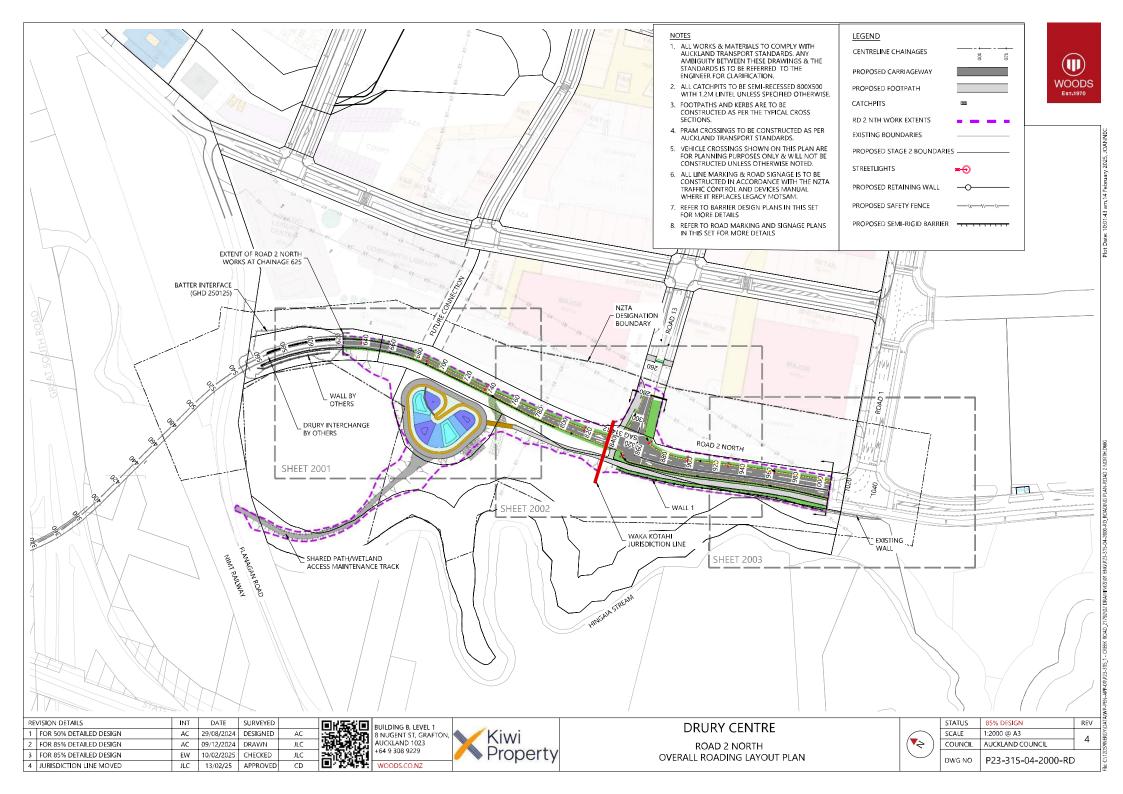


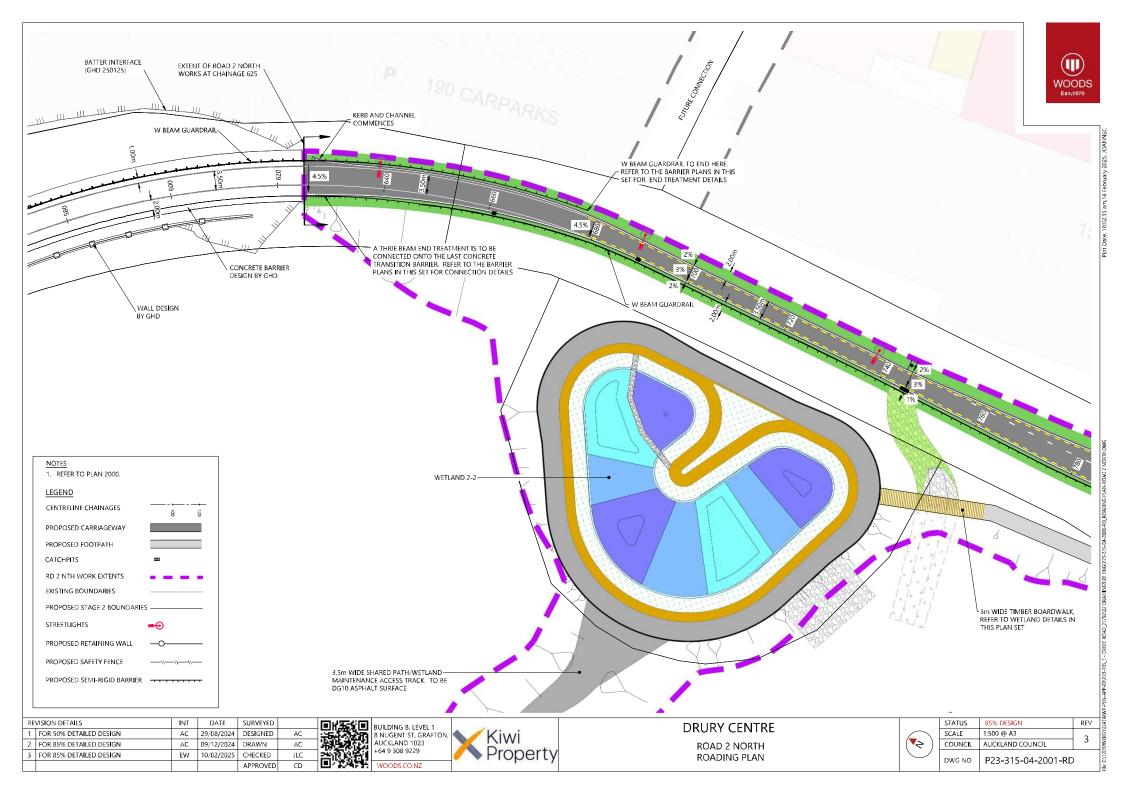
## **APPENDIX 4:**

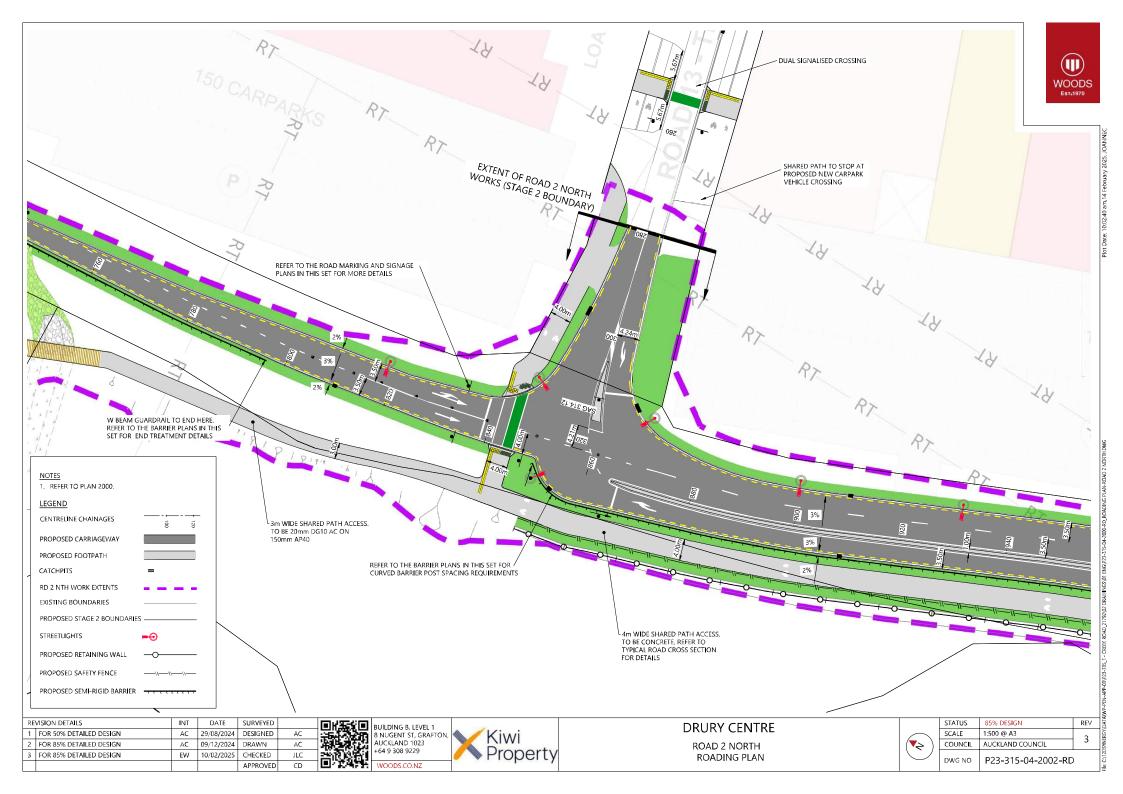
Cut Fill Plan

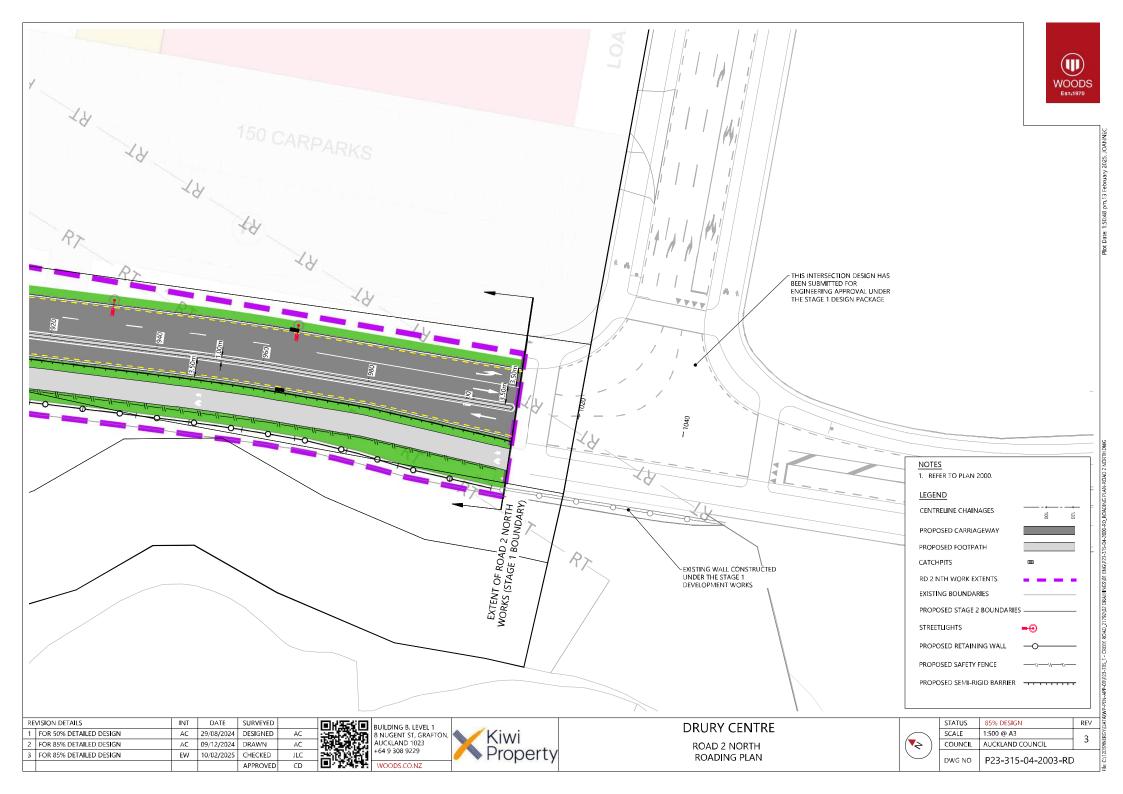


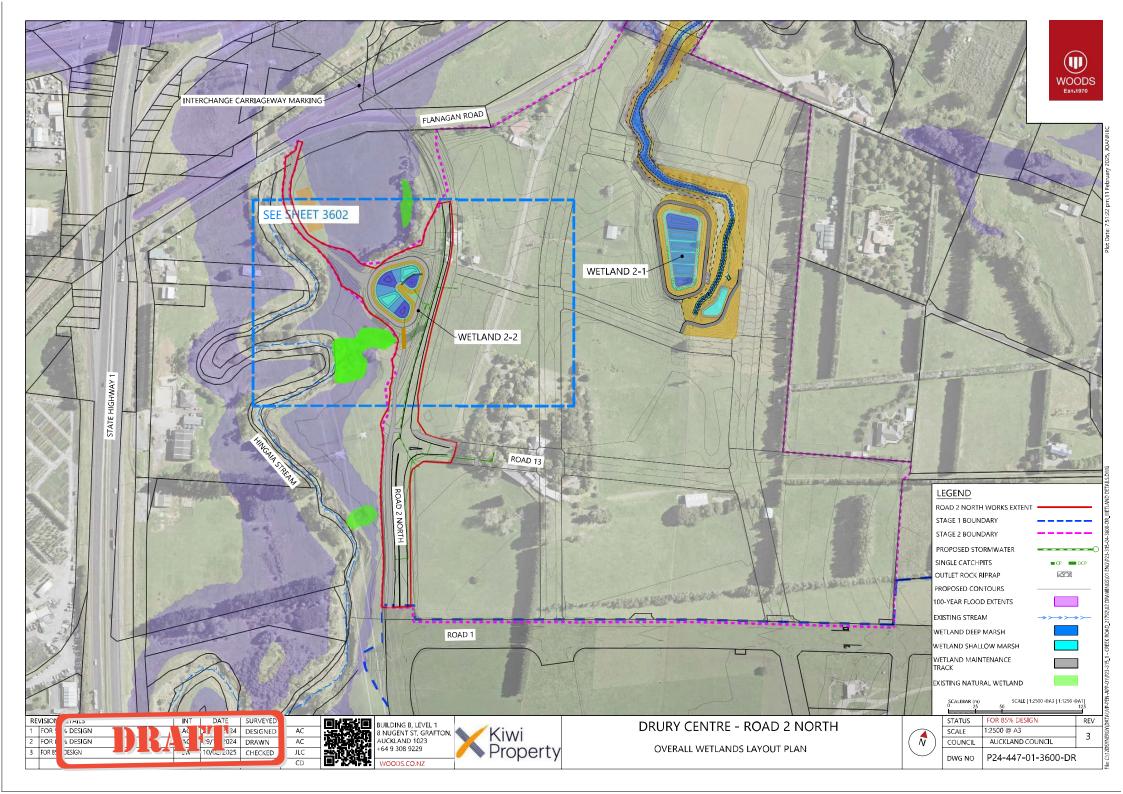


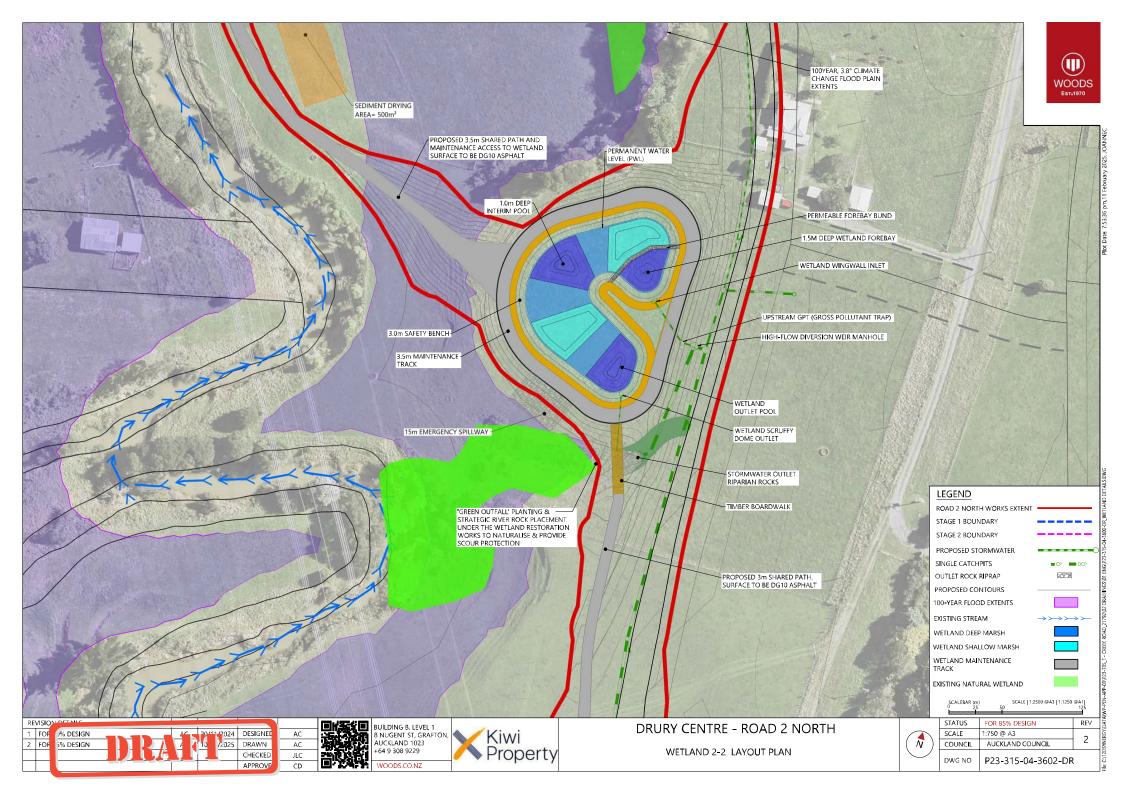


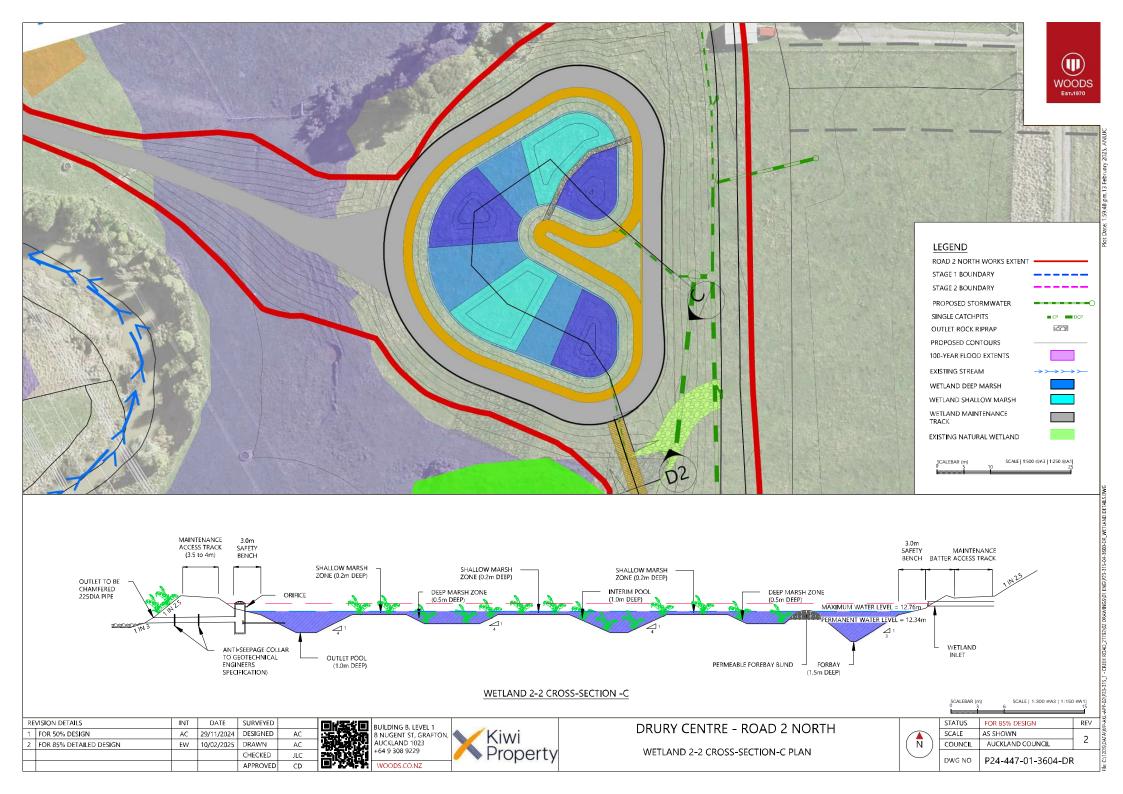


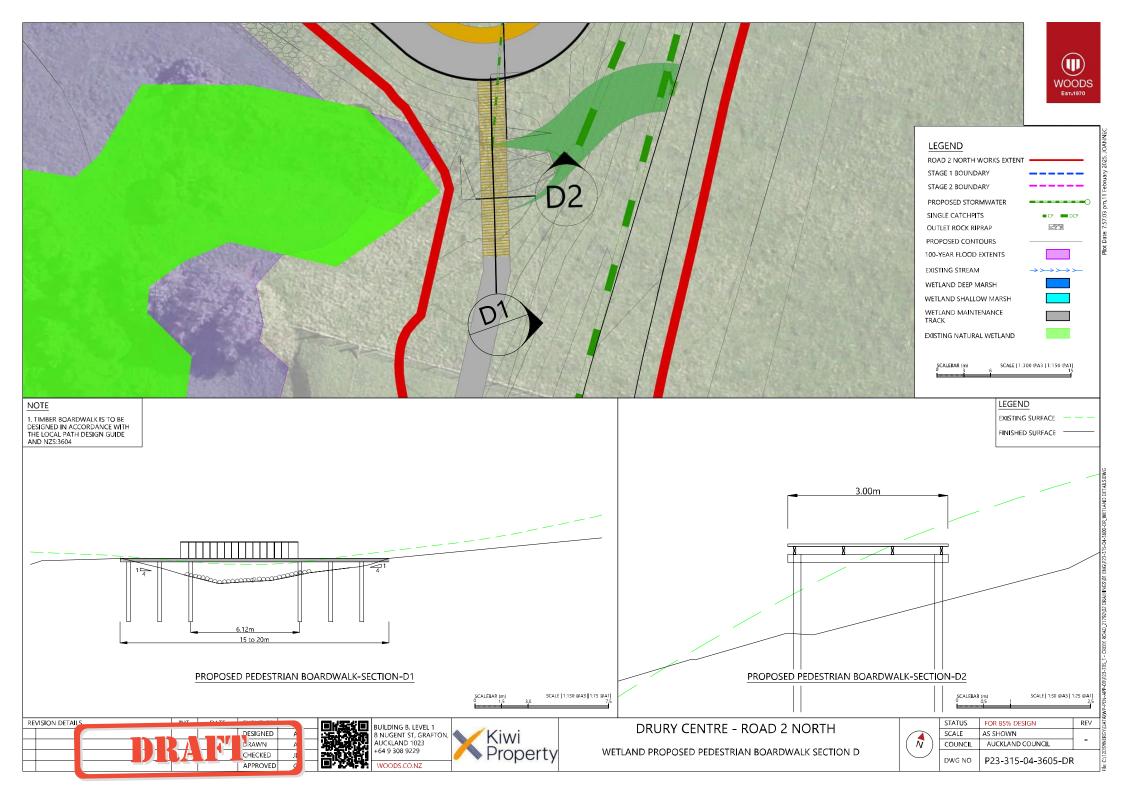


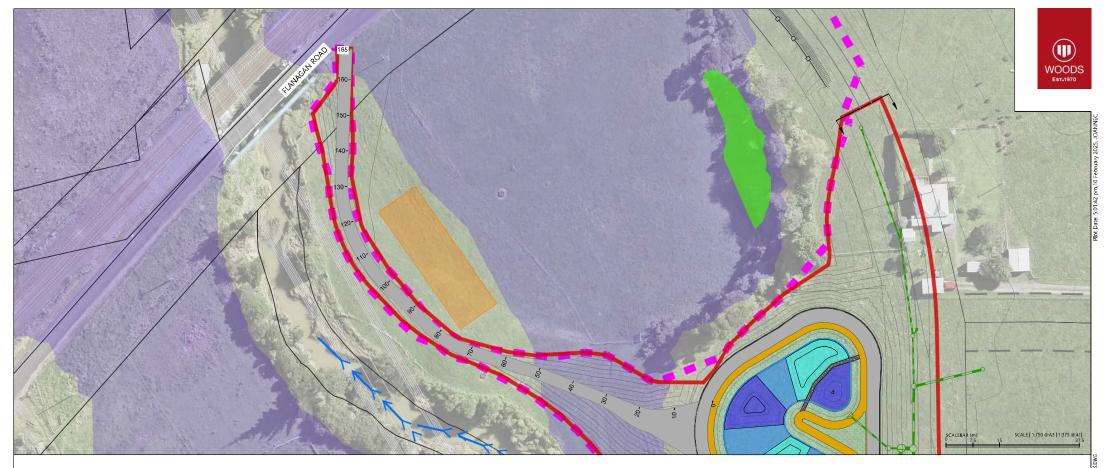


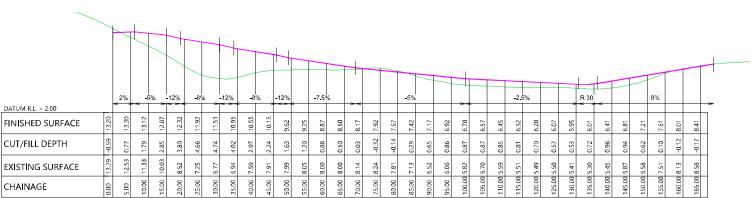












REVISION DETAILS	Y	ED	
	DESIG	:D	AC
	DRAV		AC
	CHEC	D	JLC
	APPP	ED	CD



BUILDING B, LEVEL 1
8 NUGENT ST, GRAFTON,
AUCKLAND 1023
+64 9 308 9229

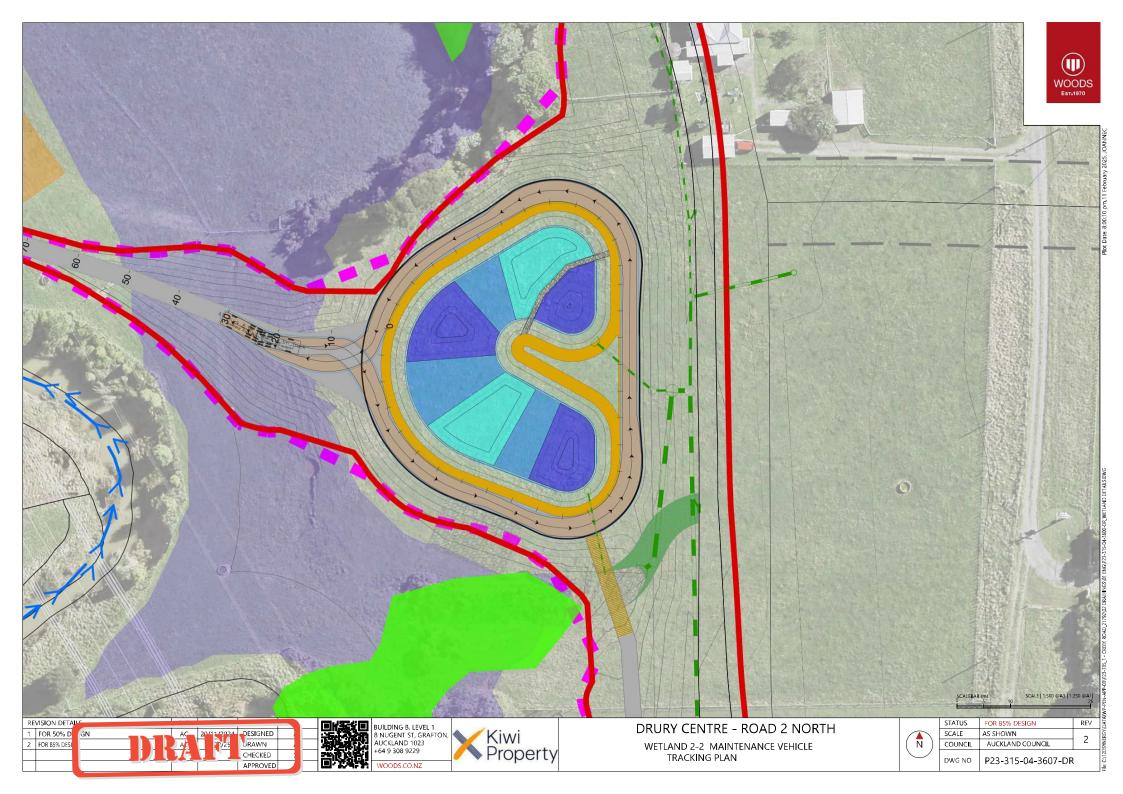
WOODS.CO.NZ



DRURY CENTRE - ROAD 2 NORTH

WETLAND MAINTENANCE ACCESS LONG-SECTION DETAIL

N	STATUS	FOR 85% DESIGN	REV	
	SCALE	AS SHOWN		
	COUNCIL	AUCKLAND COUNCIL	_	
	DWG NO	P23-315-04-3606-DR		





### **APPENDIX 5:**

Remedial Extent and Site Controls



### **Site Controls Relating to Contamination – Drury Stage 2**

#### SITE SUMMARY

Proposed Works	Soil disturbance works associated with development of commercial buildings and associated carparking, roads and infrastructure
Contaminants Identified On-Site	Metals in site soil exceed environmental protection criteria. Low concentrations of asbestos fibres in soil.
Potential Risks to Site Workers	Incidental skin contact, ingestion of soil, or inhalation of dust should be avoided / mitigated through use of PPE and welfare measures.

### **KEY CONTACTS**

Auckland Council Pollution Hotline	09 377 3107
WorkSafe	0800 030 040
Contaminated Land Specialist (ENGEO)	(09) 972 2205

### **HEALTH & SAFETY**

All contractors and visitor shall be **inducted** before entering or commencing work to ensure they are **aware of the potential hazards** relating to contaminated soil at the site. As a minimum, facilities to wash and dry hands prior to eating, drinking or vaping / smoking should be provided.

**PPE** / **RPE** to minimise the effects of potential contamination exposure. Along with standard PPE requirements for construction sites (e.g., safety boots) the following should be considered:

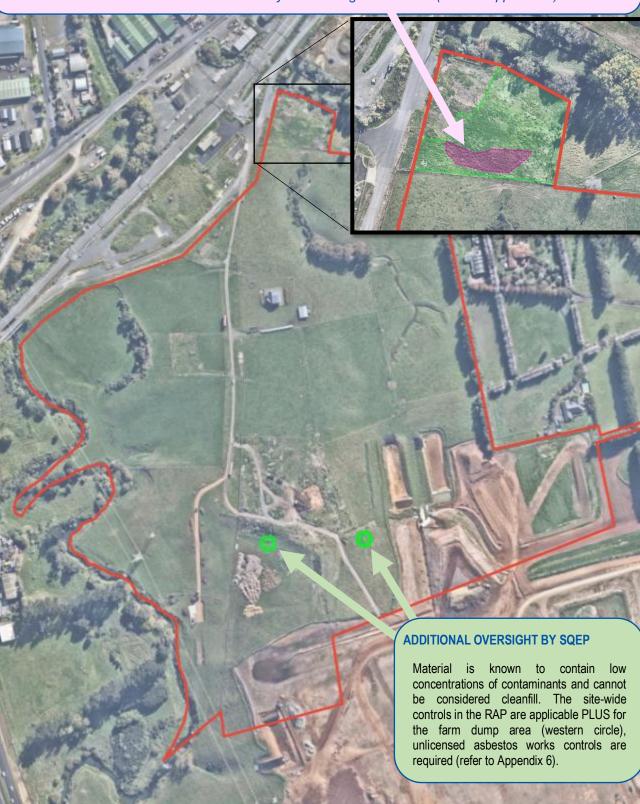
- P2 Dust Mask (if visible dust is present)
- ☐ Goggles / safety glasses (if visible dust is present)

#### **UNEXPECTED DISCOVERY**

Works shall temporarily stop and the Contaminated Land Specialist contacted should any areas of potential contamination be discovered during works. Typical indicators of contamination are asbestos containing material, staining, odorous material, visible sheen on water.

#### **UNDOCUMENTED FILL SOIL**

Asbestos containing materials were identified. Soil must be disposed of to a facility licensed to accept the level of contaminants present (refer to Appendix 2 or Section 2.7 for known contaminant concentrations). Asbestos related works controls are necessary for handling this material (refer to Appendix 6).



### **DAILY SITE CHECK** (take photographs to record check)

- Security fencing and appropriate warning signs are in place.
- Sediment control measures in good condition and working as designed.
- ☐ Check site entrance and adjacent public road for silt / sediment deposition.
- □ Check integrity of stockpile controls (if applicable).
- □ Check excavations to see if **perched groundwater or surface water** requires removal. Approval from local authority is required to discharge to local network refer to RAP

### **GENERAL SITE CONTROLS**

- Dust shall be managed in accordance with consent requirements and relevant regulations.
- If excavated material is **odorous**, odour control measures shall be put in place.
- If perched groundwater or surface water is encountered the controls in the RAP shall be implemented.
- If temporary stockpiling of non-cleanfill material is necessary, dust shall be controlled through wetting during the workday. If left overnight, the material shall be covered (e.g., with plastic) and protected by erosion / sediment controls (e.g., bunded).
- Stockpiles of non-cleanfill material shall be located either on an impermeable surface, or the underlying material should be considered potentially contaminated, and shall be managed in accordance with the RAP.
- □ Clean and dirty areas should be managed to prevent tracking potentially impacted soils around the site and off-site.
- Any wastewater generated, or rock / soil utilised in a truck loading area should be disposed of as contaminated material, unless tested.

#### **RECORD KEEPING**

- Daily photographs to be made available on request.
- Disposal dockets for all material should be forwarded to the Contaminated Land Specialist.
- Fill imported to site shall meet the Auckland Council definition of cleanfill.
- The location of any contaminated soils retained on-site shall be recorded on as built drawings.

#### OFF-SITE DISPOSAL OF CONTAMINATED SOIL

- Trucks shall be loaded in a location within the site where runoff and possible spills during loading will be controlled and contained. Loads must be securely covered during off-site transport. Soil must be taken to an appropriate soil disposal facility authorised to accept the contaminants identified.
- □ Prior to acceptance the results of the soil testing may be requested by the receiving facility.
- □ Requirements for additional testing and truck lining / soil wrapping should be confirmed with the receiving landfill.
- □ Further testing may be required to assess whether deeper material is cleanfill / managed fill.





### **APPENDIX 6:**



Scenario (NZ GAMAS 2017 definitions)	Control Measure Objectives	Unlicensed Asbestos Work	Asbestos-related Work	Class B: non-friable	Class A: friable	Source Guideline Reference
FA/AF % w/w in soil		≤ 0.001	> 0.001	> 0.01	>1	
ACM % w/w		≤ 0.01%	> 0.01	>1	-	
Scale, soil volume		≤ NESCS	> NESCS	-		
Asbestos in air		< 0.01 f/mL in air	< 0.01 f/mL in air	≥ 0.01 f/mL in air	≥ 0.01 f/mL in air	
REMOVAL WORKS RESPONSIBILITIE	:S					
Remedial Works Supervision / Oversight		A Suitably Qualified and Experienced Pra		Class B Supervisor	Class A Supervisor	ACOP
WorkSafe Notification	OBJECTIVE:	Not rec	quired	Notification five days before ea	arthworks are to be undertaken	ACOP
Contractor License Requirements	Undertake work by persons who have adequate knowledge and experience to	Not rec	quired	Class B License	Class A License	ACOP
Training/Certification Requirements	assess the risks and implement appropriate control measures  Non-certified training in asbestos identication control  A copy of the training shape of the control of the co		ols.	Certified training for workers.  Certified, competent supervisors.	Certified training for workers.  Certified, competent supervisors.  Certified safety management system.	Figure 17 ACOP
SITE SET-UP						
Boundary Controls	OBJECTIVE:  Prevent unauthorised access into works areas and accidental transport of contaminated soils on boots, clothing, equipment, skin, or in air / dust.	Physical barriers must be in place to prevent unauthorised access.	Physical barriers must be in place to prevent unauthorised access.  Warning signs must be present that clearly show that asbestos related works are underway.	Physical barriers must be in place to prevent unauthorised access.  Polythene sheeting may be necessary to prevent spread of airborne fibres outside of works area.  Warning signs must be present that clearly show that as	Physical barriers must be in place to prevent unauthorised access.  Consider use of solid hoarding placed at a suitable distance beyond the works area, or full enclosure.  Warning signs must be present that clearly show that asbestos removal works are underway.	ACOP
Personal Decontamination Facilities		Educate site workers to minimise contact with soil.  Provide a boot wash and lidded and plastic lined bin for secure disposal of used PPE.	Basic disposable decontamination tent	and boot wash.	Basic disposable wet decontamination tent or trailer.	NZ GAMAS Table 6
Dust / Asbestos Fibre Suppression	OBJECTIVE:	Minimise the size of the earthworks areas and time exposed to the elements.  Stabilise exposed earth surfaces as soon as possible following works.				



Scenario (NZ GAMAS 2017 definitions)	Control Measure Objectives	Unlicensed Asbestos Work	Asbestos-related Work	Class B: non-friable	Class A: friable	Source Guideline Reference
FA/AF % w/w in soil		≤ 0.001	> 0.001	> 0.01	>1	
ACM % w/w		≤ 0.01%	> 0.01	>1		
Scale, soil volume		≤ NESCS	> NESCS	-		
Asbestos in air		< 0.01 f/mL in air	< 0.01 f/mL in air	≥ 0.01 f/mL in air	≥ 0.01 f/mL in air	
	Minimise the release of asbestos fibres from soils.	Spray mist water via localised points. Con where a reliable source of water is not available consider implementing additional controls receptors nearby (such as adjacent to bus	ailable. s (as per Class B works) if sensitive	Spray mist water via localised points. As where the location is sensitive (such as a source of water is not readily available Consider temporary cover of contaminary	adjacent to busy centres, schools) or if	NZ GAMAS Table 6



Scenario (NZ definit		Control Measure Objectives	Unlicensed Asbestos Work	Asbestos-related Work	Class B: non-friable	Class A: friable	Source Guideline Reference
F	A/AF % w/w in soil		≤ 0.001	> 0.001	> 0.01	> 1	
	ACM % w/w		≤ 0.01%	> 0.01	> 1	-	
	Scale, soil volume		≤ NESCS	> NESCS	-	-	
	Asbestos in air		< 0.01 f/mL in air	< 0.01 f/mL in air	≥ 0.01 f/mL in air	≥ 0.01 f/mL in air	
OCCUPATIONAL H	IEALTH AND SAFE	тү					
	OBJECTIVE:  Minimise workers exposure to Educate site world		Educate site workers to minimise	prevent contamination of laces.		tegory 3, nitrile gloves rred as these can be readily washed down. Disposable overshoes can be used to	
Personal Protective Equipment & Respiratory Protective Equipment	asbestos fibres.  Reduce accidental transport of asbestos contaminated soils off site on workers clothing, boots.	accidental transport of and to undertake activities in a manner that reduces dust.	Disposable P2 dust mask recommended.	Half-face P3 respirator with particulate filter.  Consider increasing to full-face if friable ACM present.	Full-face P3 respirator with particulate filter.  Consider increasing to power-assisted if required.	NZ GAMAS Table 6  Refer to Part C section 14 of the ACOP and AS/NZS 1715:2009 for more information	
Contractor Hea	alth Monitoring	OBJECTIVE:  Mitigate risks to workers from the potentially harmful effects of asbestos through the workplace.	The contractor must ensure that worker health monitoring is undertaken in accordance with the Asbestos Regulations Clause 15 and 16.		In accordance with the Asbestos Regulations Clause 15 and 16, a PCBU must ensure that health monitoring is provided to workers involved in more than four weeks of Class B work in any twelve-month period. Refer ACOP Section 16	In accordance with the Asbestos Regulations Clause 15 and 16, a PCBU must ensure that health monitoring is provided to workers involved in Class A work. Refer ACOP Section 16	ACOP Section 16
MONITORING PROCEDURES							
Air Monitoring	Responsibility	OBJECTIVE:  Provide a clear expectation of who is responsible for undertaking monitoring, and that the person has the	SQEP / Comp	petent Person	Independent Licensed Asbestos Assessor OR Independent Competent Person as defined within Section 30.4 of the ACOP	Independent Licensed Asbestos Assessor	Section 30.4 of the ACOP



Scenario (NZ ( definit		Control Measure Objectives	Unlicensed Asbestos Work	Asbestos-related Work	Class B: non-friable	Class A: friable	Source Guideline Reference
FA	A/AF % w/w in soil		≤ 0.001	> 0.001	> 0.01	> 1	
	ACM % w/w		≤ 0.01%	> 0.01	>1	-	
:	Scale, soil volume		≤ NESCS	> NESCS	-	-	
	Asbestos in air		< 0.01 f/mL in air	< 0.01 f/mL in air	≥ 0.01 f/mL in air	≥ 0.01 f/mL in air	
		appropriate skills and knowledge to do so.					
	Requirement	To provide verification that works have been safely undertaken.	Air monitoring is not required for Unlicensed Asbestos works, or Asbestos Related works (as defined under the NZ GAMAS) however it is recommended where possible to provide assurances regarding cross contamination and		If the SQEP or competent person considers that the trace level of 0.01 f/ml may be exceeded, then air	Air monitoring must be conducted before and during Class A asbestos removal work.	NZ GAMAS Section 5.5
		To provide early warning of potentially harmful levels of exposure.	protection of workers.		monitoring must be undertaken.	Tomoral work.	
		To identify when asbestos is present in air at a concentration that presents an unacceptable risk to site workers and			All results shall be below 0.01 fibres / r < 0.01 f/ml – continue with works	nl.	
		surrounding receptors.  Undertake works by persons who have	If the concentration exceeds 0.01 f/ml then works are Class B or Class A works under the NZ GAMAS definition.		> 0.01 f/ml – investigate the cause and	implement additional controls	
		been trained to manage the risks associated with asbestos.			<ul> <li>&gt; 0.02 f/ml – stop works and investigate, notify WorkSafe</li> <li>&gt; 0.1 f/ml – Remedial works required. PCBUs with management or control of workplace are to ensure that exposure of a person at the workplace to airborne asbestos is eliminated so far as is reasonably practicable.</li> </ul>		
	Compliance	Implement additional control measures when necessary.					Section 30 of the ACOP
SITE CONTROLS							
	Vehicle assessment before demobilisation from site	OBJECTIVE:  Minimise the potential for accidental	Minimise vehicle transport onto site areas locations where asbestos fibres may be p Visual assessment.		Visual (plus swab samples if friable ACM is elsewhere on-site – lagging, insulation, etc).	Visual plus swab samples, air sampling should be undertaken inside the cab.	NZ GAMAS Table 7
Vehicle Decontamination	Vehicle assessment completed by	transport of contaminated soils or asbestos fibres out of the works areas on, or in vehicles.	Competent person or SQEP.		Independent licensed assessor or independent competent person (meeting the requirements of regulation 41(3) under the Asbestos Regulations).	Independent licensed assessor.	NZ GAMAS Table 7
	Truck/excavator air conditioning	OBJECTIVE:  To prevent the contamination of internal spaces of equipment where people work.  To avoid worker exposure to asbestos fibres.	Standard air conditioning.		HEPA filter system fitted for all occupied vehicles where friable ACM on-site.	HEPA filter system fitted for all occupied vehicles, filter replaced or clean down with HEPA vacuum cleaner post work.	NZ GAMAS Table 7
MANAGEMENT OF	CONTAMINATED N	MATERIAL					



Scenario (NZ GAMAS 2017 definitions)	Control Measure Objectives	Unlicensed Asbestos Work	Asbestos-related Work	Class B: non-friable	Class A: friable	Source Guideline Reference
FA/AF % w/w in soil		≤ 0.001	> 0.001	> 0.01	> 1	
ACM % w/w		≤ 0.01%	> 0.01	>1	-	
Scale, soil volume		≤ NESCS	> NESCS	-		
Asbestos in air		< 0.01 f/mL in air	< 0.01 f/mL in air	≥ 0.01 f/mL in air	≥ 0.01 f/mL in air	
Stockpiles of impacted soils	OBJECTIVE:  To minimise the release of asbestos fibres into air.	Stockpiles should be avoided where possible to ensure that exposed areas of soil are minimised. All temporary stockpiled asbestos contaminated material which is created and not proposed to be immediately moved should be covered. Stockpiles shall be located on an impermeable surface within an area protected by erosion and sediment controls. Consider covering stockpiles with polythene.				
Used PPE	Asbestos contaminated material is to be appropriately transported and disposed in a location where the material presents no unacceptable human health risk.	All disposable PPE used during remediation of asbestos impacted soil should be placed in a 200 micron HDPE plastic bag within the decontamination area. The bag should be taped closed (in a goose neck fashion) after each item is added and kept damp via the addition of water. Once full, the bag should be double bagged (200 micron HDPE) and labelled "Asbestos hazard – wear respirator and protective clothing while handling contents".				
Contaminated Soil	To track the movement of contaminated materials.	The location of any soils retained on-site of the receiving facility should be contacted. Trucks shall have their loads securely converged waste manifests should be completed an Site records shall be cross checked again. The bins / skips or trucks shall be loaded. Special waste bins / skips or trucks, approappointed licensed landfill facility shall be trucks will be lined / wrapped in accordant facility. It is recommended that any soil which corpolity of the sound of the same of th	in advance of the soil disposal to verify the vered during off-site transport of material. It describes the receipts of soil disposal from the receivable within the site where runoff and possible soved for the transport of ACM to the placed on-site. The bins / skips or the with requirements of receiving that in a sabestos in concentrations and the controls stated in the Land	ving facility.	d contained.  proved for the transport of ACM to the placed on-site. The bins / skips or led plastic.  contains asbestos in concentrations and the controls stated in the Land	NZ GAMAS Section 6.6
Contaminated Water		label signage should be displayed on the disposal.  Water used for cleaning asbestos-contamfacility.  If excessive water is applied, ponding or rwork area should be retained inside the best of the same as the s	vehicles transporting the soil for inated equipment (including vehicles) shaunoff may occur which could permit the tr	hazard label signage should be displayed for disposal.  all be placed into a drum or skip and disposansport and accumulation of asbestos fin	ed on the vehicles transporting the soil	NZ GAMAS Section 6.6

