Information sheet for environmental audits and preliminary risk screen assessments (PRSAs)

Publication 2009 June 2021

Victoria's audit system

An environmental audit system has operated in Victoria since 1989. The *Environment Protection Act 2017* (the Act) provides for the appointment of environmental auditors. It also provides for Environment Protection Authority (EPA or the Authority) to have a system of preliminary risk screen assessments (PRSAs) and environmental audits. These are used in the planning, approval, regulation and management of activities, and in protection of human health and the environment.

Under the Act, the functions of an environmental auditor include to:

- conduct PRSAs and environmental audits
- prepare and issue PRSA statements and reports, and environmental audit statements and reports.

The purpose of a PRSA is to:

- assess the likelihood of the presence of contaminated land
- determine if an environmental audit is required
- recommend a scope for the environmental audit if an environmental audit is required.

The purpose of an environmental audit is to:

- assess the nature and extent of the risk of harm to human health or the environment from contaminated land, waste, pollution, or any activity
- recommend measures to manage the risk of harm to human health or the environment from contaminated land, waste, pollution, or any activity
- make recommendations to manage any contaminated land, waste, pollution or activity.

Upon completion, all PRSAs and environmental audits require preparation of either a PRSA statement, accompanied by a PRSA report, or an environmental audit statement, accompanied by an environmental audit report.

A person may engage an environmental auditor to conduct a PRSA or an environmental audit.

EPA administers the environmental audit system and ensures an acceptable quality of environmental auditing is maintained. This is achieved by assessing auditor applications and conducting a quality assurance program. These measures ensure that PRSAs and environmental audits that environmental auditors undertake are completed in accordance with the relevant sections of the Act or any other Act, and with the guidelines the Authority or other government agencies have published.

File structures

EPA stores digital statements and reports from PRSAs and environmental audits in three parts:

- Part A, the PRSA or environmental audit report
- Part B, report appendices
- Part C, the PRSA statement and executive summary or environmental audit statement and executive summary.

Report executive summaries, findings and recommendations should be read and relied upon only in the context of the whole document, including any appendices and the PRSA statement or environmental audit statement.

Currency of PRSAs and environmental audits

PRSAs and environmental audits are based on the conditions encountered and information reviewed at the time of preparation. They don't represent any changes that may have occurred since the completion date. As it's not possible for the PRSA or audit report to present all data that could be of interest to all readers, consideration should be made to any appendices or referenced documentation for further information.

When information about the site changes from what was available at the time the PRSA or environmental audit was completed, or where an administrative error is identified, an environmental auditor may amend or withdraw PRSA or environmental audit statements and/or reports. Users are advised to check EPA's website to ensure documents' currency.

PDF searchability and printing

EPA can only provide PRSAs and environmental audit statements, reports and appendices that the environmental auditor provided to EPA via the EPA portal on the EPA website.

All statements and reports should be in a Portable Document Format (PDF) and searchable; however at times some appendices may be provided as image-only PDFs, which can affect searchability.

The PDF is compatible with Adobe Acrobat Reader, which is downloadable free from Adobe's Website (www.adobe.com).

Further information

For more information on Victoria's environmental audit system, visit EPA's website or contact EPA's Environmental Audit Unit.

Web: www.epa.vic.gov.au

Email: environmental.audit@epa.vic.gov.au

Preliminary Risk Screen Assessment

Former Seaton Heyfield Primary School Plantation, Schoolhouse Lane, Seaton, Victoria

Prepared for:

Department of Treasury and Finance

Level 5, 1 Treasury Place
Melbourne Vic 3002

23 May 2022

Preliminary Risk Screen Assessment

Former Seaton Heyfield Primary School Plantation, Schoolhouse Lane, Seaton, Victoria

Report No.: 31105.01

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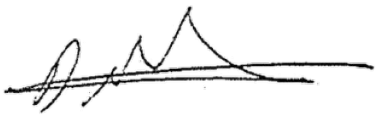

Dr Darren Bennetts
Environmental Auditor
Appointed pursuant to the Environment Protection Act 2017

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List of Abbreviations

Table 1 List of Abbreviations

Abbreviation	Definition
ACM	Asbestos Containing Material
AHD	Australian Height Datum
AS	Australian Standard
ASC	Assessment of Site Contamination
CoPC	Contaminant of Potential Concern
CSM	Conceptual Site Model
DELWP	Department of Environment, Land, Water and Planning
EPA	Environment Protection Authority (Victoria)
mg/kg	Milligrams per kilograms
mg/L	Milligrams per Litre
NEPC	National Environment Protection Council
NEPM (ASC)	National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended from time to time
OCP	Organochlorine Pesticide
OPP	Organophosphate Pesticide
PAH	Polycyclic Aromatic Hydrocarbon
PID	Photoionisation Detector
QA	Quality Assurance
QC	Quality Control
TDS	Total Dissolved Solids
TPH	Total Petroleum Hydrocarbon
TRH	Total Recoverable Hydrocarbon
VOC	Volatile Organic Compound

Executive Summary

This Preliminary Risk Screen Assessment (PRSA) report and accompanying PRSA Statement were prepared by Dr Darren Bennetts of BlueSphere Environmental Pty Ltd (BlueSphere), an Environmental Auditor appointed pursuant to the *Environment Protection Act 2017* (the Act). A PRSA was requested by Mai Pham of the Department of Treasury and Finance (DTF) for land located at Schoolhouse Lane, Seaton, Victoria (herein referred to as 'the Site').

The PRSA was conducted in accordance with Division 2 of Part 8.3 of the Act and in a manner consistent with relevant guidelines issued by the Environment Protection Authority (EPA), in particular, EPA Publication 2021, *Guideline for Conducting Preliminary Risk Screen Assessments*, February 2022.

Information relating to the Site and PRSA is provided in **Table 2** and **Table 3** below[1].

Table 2 Summary of PRSA Information

Aspect	Description
Auditor	Dr Darren Bennetts
Auditor Account Number	101214
Name of person requesting PRSA	Mai Pham
Relationship of person requesting PRSA to site	Environmental Project Manager, Department of Treasury and Finance (DTF). DTF is assisting with potential divestment of the Site on behalf of the Site owner.
Name of Site owner	Minister Administering the Education and Training Reform Act 2006 (Schools)
Date of auditor engagement	1 March 2022
Completion date of the PRSA	23 May 2022
Reason for the PRSA	Voluntary
Elements of the environment assessed	• Land • Water (groundwater and surface water)
Planning permit number or requirement detail if applicable	-
EPA Region	Gippsland
Municipality	Wellington Shire Council
Dominant – Lot on plan	Crown Allotment 62G, Parish of Glenmaggie, Volume 11737, Folio 349
Additional – Lot on plan(s)	-
Site / Premise name	Former Seaton Heyfield Primary School Plantation

[1] As required in accordance with Appendix A of EPA Publication 2022 August 2021

Aspect	Description
Building / complex sub-unit No.	-
Street / Lot – Lower No.	-
Street / Lot – Upper No.	-
Street Name	Schoolhouse
Street type (road, court, etc.)	Lane
Street suffix (North, South, etc.)	-
Suburb	Seaton
Postcode	3858
Site area (in square metres)	20,640 m^2
Plan of site/ premises/ location showing the PRSA site boundary attached	Yes Refer to **Figure F2**
Members and categories of support team utilised (categories described are in accordance with EPA Publication 865.12)	None
Further work or requirements	None
Nature and extent of continuing risk of harm	No unacceptable risk of harm identified
Outcome of the PRSA report	An environmental audit is not required

Table 3 Physical Site Information

Aspect	Description
Historical land use	Primary school
Current land use	Unoccupied
Proposed land use	Sensitive use, other (lower density) and/or Agricultural).
Current land use zoning	Public Use Zone – Education (PUZ2)
Proposed land use zoning	Farming Zone or a Rural Living Zone
Surrounding land use (north)	Agricultural land, within a Farming Zone
Surrounding land use (south)	Agricultural land, within a Farming Zone. Seaton township is located approximately 500 m south.
Surrounding land use (east)	Agricultural land, within a Farming Zone.

Aspect	Description
Surrounding land use (west)	Agricultural land, including within a Farming Zone. A Rural Living Zone is located approximately 230 m west of the Site.
Has the EPA been notified about the site under Section 40 of the *Environment Protection Act 2017*?	No
Nearest surface water receptor – name	Unnamed tributary of Back Creek
Nearest surface water receptor – direction	40 m east of the Site at the closest point
Site aquifer formation	Pliocene to Pleistocene aged sand, silt and gravels of the Haunted Hills Formation
Groundwater segment	Segment B

Whilst this Executive Summary has endeavoured to accurately summarise the key points of the PRSA report, the latter shall take precedence and the Executive Summary must be read in conjunction with the full PRSA report (BlueSphere Environmental Pty Ltd, *Preliminary Risk Screen Assessment, Schoolhouse Lane, Seaton, Victoria,* Report No.: 31105.01, 23 May 2022) and the accompanying PRSA Statement.

1 Introduction

Dr Darren Bennetts of BlueSphere Environmental Pty Ltd (BlueSphere), an Environmental Auditor appointed pursuant to the *Environment Protection Act 2017* (the Act), was requested by Mai Pham of the Department of Treasury and Finance (DTF) to undertake a Preliminary Risk Screen Assessment (PRSA) of the land located at Schoolhouse Lane, Seaton, Victoria (herein referred to as 'the Site'). The Site location is provided on **Figure F1** attached.

It is understood that DTF has been tasked with investigating the contamination status of the Site as it has been identified for potential rezoning to support future divestment of the Site. The Site is expected to be rezoned to Farming Zone or Rural Living Zone. DTF's intent is to ensure that the Site could be utilised, if desired by a purchaser, for farming use or residential purposes subject to the rezoning.

A Preliminary Site Investigation (PSI) was completed by environmental consultants SLR Consulting Australia Pty Ltd (SLR) to assess the environmental contamination status of the land. DTF requested that a PRSA be undertaken at the Site by an EPA Victoria appointed Environmental Auditor to evaluate if an environmental audit is required to support the proposed rezoning of the Site.

2 PRSA Methodology and Scope

2.1 Regulatory Framework

A PRSA is a defined function of an environmental auditor[2] under section 190 of the Act. Under section 204(2) of the Act, the purpose of a PRSA is:

a) To assess the likelihood of the presence of contaminated land; and

b) To determine if an environmental audit[3] is required; and

c) if an environmental audit is required, to recommend a scope for the environmental audit.

The outcomes of the PRSA need to be provided in the form of a PRSA report and an accompanying PRSA Statement. Information to be included in a PRSA report and statement is set out sections 207 and 206 of the Act respectively.

PRSAs are recognised within the Victorian planning framework. It is an assessment option for compliance under Ministerial Direction No. 1 – Potentially Contaminated Land and the Environmental Audit Overlay[4] and is a recommended process provided in Planning Practice Note 30, Potentially Contaminated Land (DELWP, 2021).

EPA has issued the following guideline to conduct PRSAs:

- *Guidelines for conducting preliminary risk screen assessments*, Publication 2021, February 2022.

These guidelines expand upon the requirements set out in the Act and EPA's expectations regarding the conduct and outcomes of PRSAs. According to these guidelines:

- A PRSA is a screening assessment that reviews information regarding the past use and activities undertaken at a site to consider the likelihood of the presence of contaminated land.
- It is a requirement under section 190(2) of the Act that an environmental auditor have regard to this guideline and any other guidelines issued by the Authority under section 203 of the Act, any relevant Environment Reference Standard (ERS), any relevant compliance code, and any prescribed matter when carrying out any function of an environmental auditor under the Act or any other legislation.
- A PRSA is expected to follow an assessment process consistent with that of the PSI outlined in the National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended from time to time (NEPM (ASC)).
- A PRSA can only be conducted by an EPA appointed environmental auditor who is appointed in the category of contaminated land. However, the gathering of information to be reviewed in the PRSA can be undertaken by a suitability qualified environmental consultant in the form of a PSI or undertaken directly by the environmental auditor.

2.2 Approach

To conduct this PRSA in accordance with the Act and these guidelines, the Auditor:

- Specified the Scope[5] of the PRSA, which is described in **Section 2.6**.
- Reviewed and evaluated relevant Site assessment reports (identified in **Section 3**) made available in relation to the Site, including a Site history review.
- Visited the Site to inspect actual Site conditions. This visit is described in in **Section 3.2.**
- Developed an initial Conceptual Site Model (CSM) for the Site, which is provided in **Section 3.2**.
- Liaised with the client as required.

[2] Appointed under Division 1 of Part 8.3 of the Act
[3] As defined in Division 3 of Part 8.3 of the Act
[4] As per clause 45.03 within the Victorian Planning Provision
[5] In accordance with section 206(1)(a) of the Act and as outlined in section 3.1 in EPA Publication *2021*.

- Assessed the likelihood of the presence of contaminated land, the findings of which are summarised in **Section 3.5**.
- Prepared this PRSA report and PRSA Statement (**Appendix A**) and concluded as to whether an environmental audit is required.

2.3 Information Sources

The primary sources of information used by the Auditor to form his opinions for this PRSA were as follows:

- SLR, 2022, *Preliminary Site Investigation, Former Seaton Heyfield Primary School Plantation, Schoolhouse Lane, Seaton, Victoria.* Prepared by SLR for Department of Treasury and Finance, January 2022 (herein referred to as the SLR PSI Report).
- Supplementary laboratory documentation comprising quality assurance/quality control information relating to the laboratory analyses undertaken. This was requested from DTF by the Auditor during the course of the PRSA as this documentation was not included in the SLR PSI Report.

A copy of the SLR PSI report and supplementary laboratory documentation are provided in **Appendix B** of this PRSA.

2.4 Consultation with Expert Support Team Members

The Auditor did not need to consult any members of his nominated specialist team (in accordance with EPA Publication 865.12) in conducting this PRSA. Support and assistance in conducting this PRSA was provided by Brigette Small (Project Environmental Scientist) and Victoria Mentor (Project Environmental Scientist).

2.5 Site Inspections

The Auditor inspected the Site on the following date during the PRSA (**Table 4**):

Table 4 Summary of Site Inspections

Date	Personnel	Activities
18 March 2022	Darren Bennetts Brigette Small	General inspection of Site and surrounding land

2.6 Scope

The scope[6] of the PRSA is described in **Table 5**:

Table 5 PRSA Scope

Scope Component	Description
The site in respect of which the assessment was conducted	• Municipality: Wellington Shire Council • Site address: Schoolhouse Lane, Seaton, Victoria, 3858 • Standard parcel identifiers: – Crown Allotment 62G, Parish of Glenmaggie, Volume 11737, Folio 349. A copy of the Certificate of Title is presented in **Appendix C** of this report). • Site area (m^2): 20,640 • Site zoning: Public Use Zone – Education (PUZ2)

[6] In accordance with section 206(1)(a) of the Act

Scope Component	Description
The use or proposed use for which the site is being assessed	Sensitive use - other (lower density) and agricultural
The elements of the environment assessed	• Land • Water (groundwater and surface water)
The standards considered in the assessment	• Environment Reference Standard (Victoria Government Gazette No. S 245, 26 May 2021) • National Environment Protection (Assessment of Site Contamination) Measure (NEPM (ASC)) 1999 (as amended in 2013) • AS 2159-2009, Piling – Design and Installation, Incorporating Amendment No. 1 (Standards Australia. October 2010).
Any assumptions made by the environmental auditor during the assessment	None
Any limitations in the environmental auditor's assessment	None
Any exclusions from the assessment and the rationale for these exclusions	None

2.7 Environmental Values

The Environment Reference Standard 2021 (ERS) identifies applicable environmental values for elements of the environment. Environmental values for the elements of the environment assessed as part of this PRSA, i.e., land and water (inclusive of surface water and groundwater), are identified in the following sections.

2.7.1 Land

The applicable environmental values for the element of the environment of land, as described in the ERS, are as follows:

- Land dependent ecosystems and species (natural, modified and highly modified)
- Human health
- Buildings and structures
- Aesthetics
- Production of food, flora and fibre.

2.7.2 Water – Surface Water

The applicable environmental values for the element of the environment of Water – Surface Water, as described for the 'Uplands B' in the ERS (i.e., the applicable segment for this Site), are as follows:

- Water dependent ecosystems and species that are largely modified
- Agriculture and Irrigation
- Human consumption of aquatic foods
- Industrial and commercial
- Water-based recreation (primary contact)

- Water-based recreation (secondary contact)
- Water-based recreation (aesthetic enjoyment)
- Traditional Owner cultural values.

2.7.3 Water – Groundwater

The applicable environmental values for the element of the environment of Water – Groundwater, as described in the ERS for 'Segment B' (i.e., the applicable segment for this Site, as identified in **Section 3.1.3**), are as follows:

- Water dependent ecosystems and species
- Potable mineral water supply
- Agriculture and irrigation (irrigation)
- Agriculture and irrigation (stock watering)
- Industrial and commercial use
- Water-based recreation (primary contact recreation)
- Traditional Owner cultural values
- Buildings and structures
- Geothermal properties.

3 Assessment Works Completed

Assessment activities were completed by assessment consultants SLR, which are documented in the SLR PSI Report. The quality and completeness of information documented in this report was assessed by the Auditor and found to be acceptable for the purposes of this PRSA. A summary of the Auditor's evaluation of the quality and completeness of the reports is provided in **Appendix D**.

A summary of the SLR PSI Report and its findings are provided in the following sections.

3.1 Preliminary Site Investigation

The approach and methodology documented in the SLR PSI Report were completed in general accordance with Schedule B2 of the NEPM (ASC), which comprised elements typically required for building an CSM[7]. It included:

- A desktop study, including a review of regional and local geological conditions, and historical land use; and
- A Site inspection (completed on 27 September 2021).

Relevant findings documented within the SLR PSI Report are summarised in the following sections.

3.1.1 Topography

The Site lies at an elevation of approximately 130 metres Australian Height Datum (m AHD) on the north-western boundary and gradually falls to 120 m AHD towards the south-eastern corner of the Site. A topographic map is presented in the Lotsearch report provided in Appendix F of the SLR PSI Report.

3.1.2 Surface Water Bodies

A farm dam of approximately 400 m^2 is located in the north-west corner of the Site. The farm dam receives stormwater inflows from the Site and the land to the west and north of the Site. A tributary of Back Creek is located approximately 40 m east of the Site at its nearest point, with Back Creek itself approximately 320 m south of the Site. Lake Glenmaggie is located approximately 6.5 km east of the Site. These are shown on the topographical map provided in the Lotsearch Report, presented in Appendix F of the SLR PSI Report.

3.1.3 Regional Geology and Soil

Based on the SLR PSI report, the Site is expected to be underlain by Pliocene to Pleistocene aged sand, silt, and gravel of the Haunted Hills Formation. Quaternary aged alluvium is indicated to be present to the south of the Site, inferred to be overlying the Haunted Hill Formation. A geological map is presented in the Lotsearch report provided in Appendix F of the SLR PSI Report.

SLR state that *"Soil landscapes underlying the site and surrounds are comprised of brown sodosols, which are characterised by dissected, undulating, high plain morphology, gently sloping to flat areas of hard neutral and acidic yellow mottled soils.*" SLR's review of the Atlas of Australian Acid Sulfate Soils (CSIRO Land and Water, 2011) website indicated that the site area has a low probability of occurrence of Acid Sulfate Soils.

3.1.4 Hydrogeology

The Haunted Hills Formation is expected to form an unconfined to semi-confined aquifer in the vicinity of the Site. Groundwater is expected to flow in a south-easterly direction, consistent with the local topography and location of nearby surface water receptors (Back Creek). The on-site approximate depth to water table at the site is expected to range between 20 to 50 metres below ground level (m BGL).

In SLR's PSI Report, it is indicated that the regional groundwater total dissolved solids (TDS) concentrations are likely to range between 1,000 to 3,500 mg/L. Based on the lowest TDS, this would place the groundwater in Segment B in accordance with the ERS.

[7] Also defined in Schedule B2 of the NEPM (ASC)

3.1.5 Historical Activities

The Site history review undertaken by SLR for the PSI identified that the Site was historically used as the Seaton Heyfield Primary School. An interview with a farmer who currently leases the property for cattle grazing indicated that the school closed in the 1940s. Prior to that, the land was vacant. SLR reviewed historical aerial photographs from 1944 to 2020 in its PSI report (**Appendix B**). It noted that two small buildings were apparent in 1953 in the north-eastern portion of the Site and were then removed in 1972. It is understood that these buildings were disused at this time.

SLR report that a small dam was established in 1972 in the north-west corner of the Site. In 1976 another building was erected at the centre of the Site consistent with the slab of concrete observed in the Site inspection. Anecdotal information obtained from a farmer who currently leases the property indicated that a log cabin was constructed in the 1970s for use as a school camp. Aerial photographs indicate this building was removed by 2013.

It was also reported based on the interview that there has been “a few” fires at and in the vicinity of the Site, which the farmers themselves have managed without CFA assistance. The farmer also stated that a concrete pit located in the vicinity of former log cabin was associated with a septic system, and that he was not aware of any fuel tanks, rather, heating was likely obtained from fire places.

3.1.6 Site Inspection and Site Features

The Site was inspected by SLR on 27 September 2021. Site photographs obtained by SLR are provided in Appendix I of the SLR PSI Report and a Site plan showing the location of the key Site features is provided in Figure 1 of the SLR PSI Report. SLR made the following key observations:

- The Site was vacant, with a fence along the eastern boundary. The boundaries of the Site were indicated by where vegetation ceased, and open grazing land began.
- The land to the north, south and west was open paddocks with cattle grazing. Cattle grazing was also inferred to occur on the Site given the absence of fences.
- Some small piles of solid wastes were observed including a pile of tyres, metal and signs in the north-west, a small pile of plastic sheeting and rope in the central-west, a pile of agricultural equipment in the south-west and a degraded empty 200 L drum.
- A concrete slab, approximately 15 m long by 5 m wide, running north-south, was present in the central area of the Site. No staining was observed on the concrete by SLR.
- A small wooden toilet block was present to the south-west of this slab, with a concrete surface and corrugated iron roof. A circular concrete pit was located adjacent to a toilet block and considered likely to be associated with a septic system. The remnants of an aboveground water tank were also observed in this area.
- A small concrete slab with a low brick structure inferred to be the remnants of a barbeque was observed in central portion of the Site
- No evidence of potential contamination was identified during the inspection undertaken by SLR.

A Site inspection was completed on 18 March 2022 by the Auditor, Dr Darren Bennetts and assistant, Brigette Small. Observed Site features are presented on **Figure F2** and photographs are provided in **Appendix E**. Overall the Auditor’s observations accord with those of SLR, apart from the following:

- The dam located in the north western corner of the Site had a layer of algae during the time of the inspection and a slight stagnant / ammonia odour. There was evidence of cattle defecating in the water which is the likely source of the water quality issues observed.
- A pile of plastic was located around a dead tree along the western boundary.

3.1.7 Current and Surrounding Land Use

A review of the surrounding land uses was conducted, and a summary is provided below in **Table 4** and shown on **Figure F2**.

Table 6 Summary of Site Details and Features

Summary of Site Details and Features		
Current Site Use		The Site is currently vacant with former school building foundations remaining along with concrete slabs and pits for water tanks, septic systems and toilets.
Adjacent Land	North	Agricultural (likely grazing) land within a Farming Zone.
	East	Agricultural (likely grazing) land within a Farming Zone.
	South	Agricultural (likely grazing) land within a Farming Zone. The township of Seaton is approximately 500 m south of the Site. Seaton Country Fire Authority Fire Station is listed along Heyfield-Seaton Road approximately 500 m south-east of the Site.
	West	Agricultural land, including within a Farming Zone. A Rural Living Zone is located approximately 230 m west of the Site.

3.2 Initial Conceptual Site Model

A conceptual site model (CSM) serves to describe how chemicals/contaminants (if present) may migrate in the environment from a point or area of release to potential receptors. It can then be used as a basis for the assessment of risks posed by exposure to these chemicals/contaminants.

An initial CSM has been formulated based on the PSI information provided and is summarised in the following sections.

3.2.1 Potential Sources of Contamination

3.2.1.1 On-Site

Potential sources of on-Site contamination, as identified by the Auditor, are summarised in **Table 7**.

Table 7 Potential On-Site Sources of Contamination

Potential Source	Contaminants of Potential Concern
Soil contaminated from the use of agricultural chemicals	OCPs/OPPs, TRHs, PAHs, metals, nutrients
Demolition of former buildings and weathering of old buildings	Potential ACM and metals (e.g. lead and zinc)
Septic System	Nitrogen, phosphorous, bacteria
Waste materials present on the ground surface including piles of agricultural equipment, tyres, metal and signs	Metals/metalloids, PAHs, TRHs, potential ACM

Notes: 1. PAH: polycyclic aromatic hydrocarbons, TRH: total recoverable hydrocarbons, ACM: asbestos containing material, OCP: organochlorine pesticides, OPP: organophosphorus pesticides

3.2.1.2 Off-Site

Most of the Site surrounds have been subject to agricultural grazing from the early 1900s which could be a potential off-Site source of contamination. Contaminants of potential concern (CoPC) include nutrients, OCPs/OPPs, TRHs, PAHs, and metals/metalloids. SLR note that a CFA fire station is located approximately 560 south-east of the Site. The potential for contamination from this facility was

considered to be low based on the inferred groundwater flow direction and distance from the Site. The Auditor agrees with SLR's rationale.

3.2.1.3 Potential Contaminant Exposure Pathways and Receptors

Should the contaminants of concern identified above (which are semi to non-volatile in nature) be present at the Site, the primary exposure pathway of concern for the proposed Site use is the direct contact of contaminated soil/fill/waste by site users such as farmers, workers and potential future residential occupants. The risks posed by this exposure would be dependent upon the degree and extent of contamination present.

Should agricultural chemicals persist in the soil, then it is possible that they may have leached downwards (to some degree, depending on their properties) towards groundwater. Nutrients and bacterial contamination associated with the septic tank and associated dispersal field also has the potential to have impacted groundwater, noting that a septic tank is designed to disperse associated contaminants into the environment where they are naturally ameliorated. However, it is considered unlikely that groundwater would have been contaminated by these activities based on the nature of the soil encountered comprising brown silty clay with high plasticity, inferred depth to groundwater, (i.e. 20 – 50 m bgl) and likely intermittent use of the septic system in particular.

3.2.2 Data Gaps

Based on initial CSM it was identified that there was the potential for contamination of soil to have occurred. SLR subsequently undertook a limited soil sampling program to confirm the absence or presence of contamination, i.e., to fill data gaps.

Identified data gaps, and the actions required to address them, are summarised in **Table 8.**

Table 8 Summary of Data Gaps

Data Gaps	Approach to Address Data Gaps
It is uncertain whether agricultural chemicals (pesticides) persist in soil	Collect a limited number of surface soil samples across the Site and analyse for the presence of pesticides
It is uncertain whether chemicals associated with hazardous building materials have contaminated surficial soil due to demolition or disrepair of buildings	Collect a limited number of surface soil samples in the vicinity of former buildings and existing toilet block and analyse for the presence of metals, and visibly identify potential asbestos containing materials.
It is uncertain whether residual soil contamination in the form of nutrients persists in soil due to the presence of a septic system	Collect a limited number of soil samples within the deeper soil profile and analyse for nutrients and investigate for visual or olfactory evidence of contamination.
It is uncertain whether stockpiles of wastes have led to contamination of soil	Collect a limited number of samples from the vicinity of the stockpiles and analyse for a broad suite of chemicals.

3.3 Soil Sampling and Analysis

A limited soil sampling and analysis program was completed by SLR as part of its PSI to investigate the potential sources of contamination identified, which are presented in **Section 3.2.1**.The approach and findings of the PSI are summarised in the following sections.

3.3.1 Approach and Methodology

The approach and methodology adopted by SLR for the PSI was in general accordance with the NEPM (ASC). A summary of the Auditor's evaluation of the quality and completeness of the PSI report is provided in **Appendix D**.

Soil samples collected were analysed for a range of chemical parameters (of varying degrees), including metals/metalloids, TRHs, PAHs, benzene, toluene, ethylbenzene, xylenes and naphthalene, nitrogen, phosphorous, pH and cation exchange capacity.

The sample locations were positioned to target the following potential sources of contamination:

- Pile of agricultural equipment
- Pile of tyres, metal and signs
- The area of the former school building
- The toilet block and septic tank
- The area of the former log cabin
- The area of the former barbeque.

Soil sampling locations are shown on Figure 2, Appendix A of the SLR PSI report.

The PSI included comparison of soil analytical results against the Ecological Investigation Levels (EILs), Ecological Screening Levels (ESLs), Health Investigation Levels (HILs) and Health Screening Levels (HSLs) provided in the NEPM (ASC), consistent with environmental value objectives set out in the ERS (2021). Site specific EILs were calculated for copper, nickel and zinc. The Auditor considers that the criteria adopted were appropriate. The waste classification criteria provided in EPA Publication 1828.2 were also considered.

3.3.2 Results

The results of the soil sampling program for the PSI are as follows:

- Topsoil was found to be present to a maximum depth of approximately 0.3 metres below ground level (m bgl) and was described by SLR as sandy silt with angular gravels, grass and roots along with organic matter. The natural soil comprised yellowish brown silty clay with high plasticity.
- PID readings taken from the soil samples were all low (i.e. 0 ppm).
- The concentrations of chemicals analysed were all reported as either below the laboratory limit of reporting or below the adopted HILs/HSLs for low-density residential land use, and EILs/ESLs for urban residential and public open space.
- Concentrations of nutrients were relatively consistent across the Site, with elevated nutrient concentrations not reported in the vicinity of the septic system compared to elsewhere at the Site.
- pH levels ranged between 4.1 and 4.3 units which would be a moderate exposure classification for soils above groundwater in accordance with AS2159 (2009). SLR note that samples were not analysed for chloride and sulfate and that *"specialist advice would be needed to assess potential corrosion risk to buildings and structures."*
- SLR noted that asbestos or asbestos containing material was not encountered during the soil sampling within the test pits sampled.

3.4 Refined Conceptual Site Model

The soil sampling and analysis program undertaken addressed the data gaps identified from the initial CSM (**Section 3.2.2**), and has confirmed that:

- Chemicals were not present at concentrations that may pose an unacceptable human health and ecological risk within the context of an urban residential or public open space land use.

On this basis, direct contact with soils present at the Site does not pose an unacceptable risk to potential future residential users of the Site.

With regard to an agricultural land use, the Auditor notes that although the EILs are not specifically developed to assess agricultural soil, *"which need evaluation in relation to crop toxicity, plant contaminant uptake and detailed consideration of soil type"* (NEPM (ASC)), the PSI did not identify any evidence of contamination that would be expected to impact upon the use of the Site for this purpose.

The pH values reported in the soil would be classified as a 'moderate' exposure classification to concrete structures in contact with soils above groundwater in accordance with AS2159 (2009). SLR did not comment on the source of the acidity. The Auditor notes that the acidic pH values are considered likely to be naturally occurring based on the absence of an identified source of acidity at the Site and noting that the natural soils are known to be acidic in nature (refer to **Section 3.1.3**). Local natural plants, grasses and fauna are likely to be adapted to this low pH level, however there may be some impact on the growth and development of some introduced plants, grasses, and fauna.

As chemical concentrations were below the adopted soil quality criteria, it is considered unlikely that groundwater contamination is present at the Site. Further, it is considered unlikely that groundwater would have been contaminated by the septic system and water quality in the dam based on the nature of the soil encountered comprising brown silty clay with high plasticity, inferred depth to groundwater, (i.e. 20 – 50 m bgl) and likely intermittent use of the septic system in particular. Given that groundwater contamination is unlikely to be present, then surface water (i.e., Back Creek approximately 40 m east of the Site, into which groundwater from the Site may discharge) is also unlikely to be contaminated from Site activities.

Although it is understood that a hazardous building material survey has not been undertaken at the Site, based on the age of the structures there is the potential for hazardous building materials to be present such as lead based paint. Based on the observations from the Site inspection and results of the soil sampling program, the Auditor considers that such building materials are not likely to present a risk of harm to human health or the environment, and therefore, within the meaning of contaminated land with the *Environment Protection Act 2017*, they do not indicate the presence of contaminated land.

Inert waste materials are present on the ground surface at some locations. These are not indicated to present an unacceptable risk to soil as supported by the results of the soil sampling program, Therefore, the Auditor has determined that these issues do not require further assessment to consider if a risk is posed to the use or proposed use of the Site. Nevertheless they represent an aesthetic issue and should be removed and disposed of to a lawful place in accordance with regulatory requirements, as recommended by SLR (refer to **Section 3.5**).

3.5 Summary of Key Findings and Conclusions

The following key findings were made from the PSI:

- The Site was formerly occupied by the Seaton Heyfield Primary School Plantation, with buildings evident in the central and north-east of the Site prior to the 1950s. The school closed in the 1940s.
- A former log cabin was present in the central portion of the Site from the 1970s until 2013. A septic tank, dilapidated barbeque and wooden toilet block are situated in this portion of the Site.
- SLR noted waste piles in the south and north-western portions of the Site consisting of tyres, plastic sheeting, rope, agricultural equipment and a degraded empty 200 L drums.

SLR subsequently concluded the following:

- "*Waste piles located in the south and north-west of the site require removal before the site it suitable for its proposed use for a farming zone (including residential use).*
- *Analyte concentrations indicated no impacts to the environmental values in a low-density residential setting and the results indicate that the site would not be precluded (by contamination) for potential use within a farming zone (including residential use).*
- *The limited sampling indicates that the soil is within the range of EPA Fill Material. However, the assessment is only preliminary and not sufficient for off-site disposal."*

Based on the Auditor's review of the PRSA, Site inspection (refer to **Section 3.1.6**) and CSM (Refer to Sections **3.2** and **3.4**), it is considered that SLR's conclusions presented above are sound.

4 Outcomes

4.1 Likelihood of the Presence of Contaminated Land

The Auditor considers that, based on the investigations conducted as part of this PRSA, the presence of contaminated land at the Site is **unlikely**.

4.2 Determination of Environmental Audit Requirement

Based on the investigations conducted as part of this PRSA, the Auditor is of the opinion **that an environmental audit is not required** for the proposed use of the Site (Sensitive use, other (lower density) and/or agricultural).

4.3 Environmental Audit Scope

The Auditor has concluded that an environmental audit is not required for the proposed use and therefore an environmental audit scope has not been provided.

4.4 PRSA Statement

The PRSA Statement is provided as **Appendix A**.

5 Limitations

This PRSA report[8] was prepared for Department of Treasury and Finance , EPA Victoria and the relevant planning authorities in accordance with the *Environment Protection Act 2017*. Any advice, opinions or recommendations contained in this document should be read and relied upon only in the context of the document as a whole and are considered current to the date of this document. Any other party should satisfy themselves that the scope of work conducted and reported herein meets their specific needs. Any other person's use of, or reliance on, the opinions, findings, conclusions, recommendations or any other material presented within this document, is at that person's sole risk.

The professional opinions expressed in this PRSA report are based upon professional judgment, experience, and training. The environmental auditor believes that his opinions are reasonably supported by the information provided in this report and that those opinions have been developed according to the professional standard of care for the environmental consulting profession in this area at this time. That standard of care may change and new methods and practices of exploration, testing, analysis and remediation may develop in the future, which might produce different results.

The findings provided in this PRSA report are based on available information and it is possible that different findings could be made should new information become available, or with changing Site conditions over time. These findings are subject to uncertainty given the potentially complex nature of any subsurface environment. Variation in soil and groundwater conditions may vary significantly between the specific sampling and testing locations and other locations at the Site.

[8] The PRSA report referred to in this section includes the accompanying PRSA statement

6 References

DELWP 2021, *Planning Practice Note 30, Potentially Contaminated Land* (DELWP, 2021).

Environment Protection Authority, February 2022, *Guideline for Conducting Preliminary Risk Screen Assessments* (EPA Publication 2021).

Environment Protection Authority, August 2021, *Provision of statements and reports for environmental audits and preliminary risk screen assessments* (EPA Publication 2022).

Environment Reference Standard (Victoria Government Gazette No. S 245 26 May 2021).

NEPC 1999. *National Environmental Protection (Assessment of Site Contamination) Measure 1999*, National Environment Protection Council as amended 15 May 2013, Comlaw No. F2013C00288.

SLR 2022, *Preliminary Site Investigation, Former Seaton Heyfield Primary School Plantation, Schoolhouse Lane, Seaton, Victoria*, prepared by SLR for DTF, January 2022.

Standards Australia AS/NZ 2009. Australian Standard AS2159 – 2009, Piling – Design and Installation, Incorporating Amendment No. 1 (October 2010), Standards Australia (AS 2159-2009), Standards Australia, Sydney.

Figures

PROJECT ID 31105.01
DATE 23/05/2022
CREATED BY BS

BlueSphere ENVIRONMENTAL

Legend

Parcel Boundary
Site Boundary

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

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GDA 1994 MGA Zone 55
Imagery: NearMap 19/02/2022

SITE LOCATION PLAN

Preliminary Risk Screening Assessment

Schoolhouse Lane,
Seaton Victoria

Figure F1

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PROJECT ID 31105.01
DATE 23/05/2022
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BlueSphere ENVIRONMENTAL

Legend

- Site Boundary

Site Features

- Area of Former Building (prior to 1970)
- Concrete Slab
- Pile of Agricultural Equipment
- Pile of Metal and Tyres
- Small Dam
- Small Slab with Bricks
- Toilet Block

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

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Imagery: GoogleEarth 27/10/2021

SITE LAYOUT PLAN

Preliminary Risk Screening Assessment

Figure **F2**

Schoolhouse Lane,
Seaton Victoria

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Appendix A
PRSA Statement

Preliminary risk screen assessment statement

Under Part 8.3 of the *Environment Protection Act 2017*

Publication F1031.1 published February 2022

The purpose of a preliminary risk screen assessment is:

(a) to assess the likelihood of the presence of contaminated land; and

(b) to determine if an environmental audit is required; and

(c) if an environmental audit is required, to recommend a scope for the environmental audit.

It is important to note that a PRSA statement is not an environmental audit statement or an environmental audit report. It should not be construed as an environmental audit conducted to assess the suitability of land use.

This statement is a summary of the findings of a preliminary risk screen assessment conducted under Part 8.3 of the *Environment Protection Act 2017* for:

Schoolhouse Lane, Seaton, Victoria

Crown Allotment 62G, Parish of Glenmaggie, Volume 11737, Folio 349.

Further details are provided in the preliminary risk screen assessment report that accompanies this statement.

Section 1: Preliminary risk screen assessment overview

Environmental auditor details

Name:	Dr Darren Bennetts
Company:	BlueSphere Environmental Pty Ltd
Address:	113 Ferrars Street, Southbank, Victoria, 3006
Phone:	(03) 9699 5286
Email:	dbennetts@bluesphere-enviro.com.au

Site owner/occupant

Name:	Minister Administering the Education and Training Reform Act 2006 (Schools)
Company:	Victoria Government

Environmental auditor engaged by

Name:	Mai Pham
Company:	Department of Treasury and Finance
Relationship to site owner:	Assisting with potential divestment of the Site on behalf of the Site owner

Reason for preliminary risk screen assessment

Planning scheme:	N/A
Permit details (if applicable):	N/A

Other:	Voluntary
☐ Permit is attached (if applicable):	N/A

Section 2: Assessment scope

Site details

Address:	Schoolhouse Lane, Seaton, Victoria
Title details:	Crown Allotment 62G, Parish of Glenmaggie, Volume 11737, Folio 349
Area (m^2):	20,640

☒ a plan of the site is attached

Use or proposed use assessed

The below section details which land uses (current and proposed) the PRSA has assessed. Note, this is not a suitability of land use audit, rather an assessment to determine if an environmental audit is required for the land uses that apply to the specific PRSA.

Sensitive land use categories

Note that sensitive land uses in the *Environment Reference Standard 2021* (ERS 2021) are categorised as lower and high density. Lower density is where there is generally substantial access to soil and high density is restricted to developments that make maximum use of available land space, and there is minimal access to soil. For planning purposes, the *Ministerial Direction No. 1* (MD No.1) considers secondary schools and children's playgrounds to be sensitive land uses.

☐ High density

☒ Other (lower density)

- ☒ Residential land use
- ☐ Child care centre
- ☐ Pre-school
- ☐ Primary school
- ☐ Secondary school

☐ Children's playground (indoor)

☐ Children's playground (outdoor)

Other land use categories

☐ Recreation/open space

☐ Parks and reserves

☒ Agricultural

☐ Commercial

☐ Industrial

☐ Other land uses not captured by the above as described here:

Environmental elements assessed

☒ Land

- ☒ all environmental values that apply to the land use category were considered **OR**
- ☐ all environmental values that apply to the land use category, other than the following, were considered:

_____

☒ Water

- ☒ Surface water
  - ☒ all environmental values that apply to the applicable segment were considered **OR**

☐ all environmental values that apply to the applicable segment, other than the following, were considered:

☒ Groundwater
- ☒ all environmental values that apply to the applicable segment were considered **OR**
- ☐ all environmental values that apply to the applicable segment, other than the following, were considered:

Standards considered

Environment Reference Standard 2021
National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended in 2013
AS 2159-2009, Piling – Design and Installation, Incorporating Amendment No. 1 (Standards Australia. October 2010).

Assumptions made during the assessment or any limitations

None

Exclusions from the assessment and the rationale for these

None

This statement is accompanied by the following preliminary risk screen assessment report

Title:	Preliminary Risk Screen Assessment, Former Seaton Heyfield Primary School Plantation, Schoolhouse Lane, Seaton, Victoria (BlueSphere Environmental Pty Ltd)
Report no:	31105.01
Date:	23 May 2022

Section 3: Assessment outcome

Based on my assessment, I am of the opinion that an environmental audit is **not required** for the following land uses, **including** the use or proposed use for which the site has been assessed:

Sensitive land use categories

Note that sensitive land uses in the ERS 2021 are categorised as lower and high density. Lower density is where there is generally substantial access to soil and high density is restricted to developments that make maximum use of available land space, and there is minimal access to soil. For planning purposes, the MD No.1 considers secondary schools and children's playgrounds to be sensitive land uses.

☐ ~~High density~~

☒ Other (lower density)

☒ Residential land use

- ☐ ~~Child care centre~~
- ☐ ~~Pre-school~~
- ☐ ~~Primary school~~
- ☐ ~~Secondary school~~

☐ ~~Children's playground (indoor)~~

☐ ~~Children's playground (outdoor)~~

Other land use categories

☐ ~~Recreation/open space~~

☐ ~~Parks and reserves~~

☒ Agricultural

☐ ~~Commercial~~

☐ ~~Industrial~~

☐ ~~Other land uses not captured by the above as described here:~~

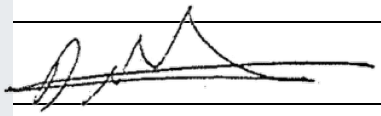
Other information

- There are structures on the site that may contain (due to their age) hazardous building materials, however the environmental auditor has assessed during the PRSA that such building materials are not likely to indicate the presence of contaminated land.
- Soil pH is low in the areas assessed but is considered to be natural in origin. Local natural plants, grasses and fauna are likely to be adapted to this low pH level, however there may be some impact on the growth and development of some introduced plants, grasses, and fauna.
- Soil may adversely affect the integrity of concrete structures in contact with soil due to its acidity. Buildings and structures should be designed in accordance with AS 2159-2009.
- Inert waste materials are present on the ground surface at some locations which are considered to present an aesthetic issue. The environmental auditor has determined that these issues do not require further assessment to consider if a risk is posed to the use or proposed use of the site.

Section 4: Environmental auditor's declaration

I state that:

- I am appointed as an environmental auditor by the Environment Protection Authority Victoria under the *Environment Protection Act 2017*.
- The findings contained in this statement represents a true and accurate summary of the findings of the preliminary risk screen assessment that I have completed.

Date:	23 May 2022
Signed:	
Name:	Dr Darren Bennetts
	Environmental Auditor

PROJECT ID 31105.01
DATE 23/05/2022
CREATED BY BS

BlueSphere ENVIRONMENTAL

Legend

Parcel Boundary
Site Boundary

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

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SITE LOCATION PLAN

Preliminary Risk Screening Assessment

Schoolhouse Lane,
Seaton Victoria

Figure A1

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