



INFORMATION REGARDING ENVIRONMENTAL AUDIT REPORTS

August 2007

VICTORIA'S AUDIT SYSTEM

An environmental audit system has operated in Victoria since 1989. The *Environment Protection Act 1970* (the Act) provides for the appointment by the Environment Protection Authority (EPA Victoria) of environmental auditors and the conduct of independent, high quality and rigorous environmental audits.

An environmental audit is an assessment of the condition of the environment, or the nature and extent of harm (or risk of harm) posed by an industrial process or activity, waste, substance or noise. Environmental audit reports are prepared by EPA-appointed environmental auditors who are highly qualified and skilled individuals.

Under the Act, the function of an environmental auditor is to conduct environmental audits and prepare environmental audit reports. Where an environmental audit is conducted to determine the condition of a site or its suitability for certain uses, an environmental auditor may issue either a certificate or statement of environmental audit.

A certificate indicates that the auditor is of the opinion that the site is suitable for any beneficial use defined in the Act, whilst a statement indicates that there is some restriction on the use of the site.

Any individual or organisation may engage appointed environmental auditors, who generally operate within the environmental consulting sector, to undertake environmental audits. The EPA administers the environmental audit system and ensures its ongoing integrity by assessing auditor applications and ensuring audits are independent and conducted with regard to guidelines issued by EPA.

AUDIT FILES STRUCTURE

Environmental audit reports are stored digitally by EPA in three parts: the audit report (part A), report appendices (part B) and, where applicable, the certificate or statement of environmental audit and an executive summary (part C). A report may be in colour and black-and-white formats. Generally, only black-and-white documents are text searchable.

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

AUDIT REPORT CURRENCY

Audit reports are based on the conditions encountered and information reviewed at the time of preparation and do not represent any changes that may have occurred since the date of completion. As it is not possible for an audit 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 regarding the condition of a site changes from that at the time an audit report is issued, or where an administrative or computation error is identified, environmental audit reports, certificates and statements may be withdrawn or amended by an environmental auditor. Users are advised to check [EPA's website](http://www.epa.vic.gov.au) to ensure the currency of the audit document.

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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/envaudit

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

Executive Summary

Mr Timothy Kent Russell of Maple Auditing Pty Ltd (Maple), an Environmental Auditor (Contaminated Land) appointed pursuant to the Environment Protection Act 1970 (Section 53S, Part IXD), was requested by Mr Andrew Johnston of Chandos Bay Pty Ltd (Chandos) (the current site owner) on 21 February 2017 to undertake an Environmental Audit of the parcel of land referred to as Lot 4 on Plan of Subdivision PS802507T and located at 20 Hamlet Street, Cheltenham, Victoria (the site).

The site was part of the larger former Nuplex site located at 322-328 Bay Rd, Cheltenham. The former Nuplex site was subdivided into 4 lots (Lots 1-4) for the purposes of site divestment and Environmental Audit works. The subject site for this Audit report is Lot 4 of the former Nuplex site. For the purposes of this Audit the site is known as Lot 4.

ARC Environmental (ARC) were engaged by Chandos to complete environmental assessment works to support the audit.

This report has been prepared in accordance with Section 53X of the Environment Protection Act and other Victorian Environment Protection Authority (EPA) guidelines and should be read in conjunction with the existing environmental assessment report(s). Further details pertaining to the site are provided in Executive Table 1 below.

Executive Table 1 Summary of Audit Information

Auditor	Timothy Kent Russell
Auditor account number	75649
Auditor appointment end date	28 March 2019 to 27 March 2024
Auditor's appointment category	Contaminated Land
Audit Type	53X
Date EPA notified of audit	24 / 02 / 2017
Audit service order number	8005308 (CARMS 74971-3)
Name of person requesting audit	Mr Andrew Johnston Chandos Bay Pty Ltd 144 Church Street Brighton, Victoria, 3186
Relationship of person requesting audit to site	Director of Chandos Bay Pty Ltd
Name of premises owner	Chandos Bay Pty Ltd
Date of auditor engagement	21 / 02 / 2017
Completion date of the audit	28 / 08 / 2020
Reason for Audit	Requirement of the EPA Victoria Clean Up Notice (#90007753) dated 11 August 2017 and amended on 19 June 2018 and amended Clean Up Notice (#90010028) dated 17 March 2020.
Audit Categorisation	Risk

Environmental Segments	Air, Land, Groundwater, Surface water
If the audit was required by an EPA notice, licence or other, please provide EPA reference number	Clean Up Notice #90007753 and #90010028.
Current land use zoning	Commercial 2 Zone (C2Z)
EPA Region	Southern Metro
Municipality	Bayside Council
Dominant Lot on title plan	Lot 4 on Plan of Subdivision PS802507T (Certificate of Title Volume 11973, Folio 119)
Additional Lot on title plan(s)	N/A
Site/Premises name	N/A
Building/complex sub-unit/lot No.	Lot 4
Street/Lot – Lower No.	20
Street/Lot – Upper No.	N/A
Street Name	Hamlet
Street type (road, court, etc.)	Street
Street suffix (North, South etc.)	N/A
Suburb	Cheltenham
Postcode	3192
GIS Coordinate of Site centroid	GDA94 – Latitude/Longitude in decimal degrees
Latitude (GDA94)	-37.956987
Longitude (GDA94)	145.040872
Site area (in square metres)	2,448 m ²
Plan of site/premises showing the audit site boundary attached	Yes
Plan of site/premises showing the audit site boundary attached in a spatial data format	No
Members and categories of support team utilised	Michael Blackam from Coffey Environments - Hydrogeology and Fate and Transport Karen Teague of Coffey Environments - Human Health and Ecological Risk Assessment)
Further works or requirements	Any landscaped area or garden bed must be constructed and maintained with at least 0.5m thickness of soil below the finished

	surface, which is demonstrated to be suitable for the site and consistent with EPA Publication IWRG 621. Groundwater at the site is polluted and is not suitable for any beneficial use. Groundwater must not be used for any beneficial use without prior testing and review of results by a suitably qualified professional to confirm its suitability for the proposed use. It may be extracted for the purpose of environmental monitoring or remediation
Nature and extent of continuing risk	Concentrations of antimony, barium, cobalt, copper, manganese, mercury, TRH F3, bis(2-ethylhexyl) phthalate, di-n-butyl phthalate, TCE and chromium VI were present in soils at the site which preclude the beneficial uses 'Maintenance of Ecosystems' and 'Production of Food, Flora and Fibre' in the context of unrestricted use of the site. Concentrations of antimony, cobalt and TCE preclude the beneficial use 'Human Health' in the context of unrestricted use of the site. The site in its current condition precludes or potentially precludes one or more beneficial uses of land in the context of unrestricted land use and therefore the Auditor is unable to issue a Certificate of Environmental Audit for the site. However, in the context of the proposed commercial/industrial use of the site, with a requirement of a minimum of 0.5m of 'clean fill' be placed below the finished surface in all landscaped areas or garden beds directly over existing site soils, all relevant beneficial uses are considered to be protected. With the inclusion of statement conditions (see Appendix A), the site is considered to be suitable for the proposed commercial/industrial use. The Statement of Environmental Audit is provided in Appendix A. It is noted basement structures have not been assessed as part of the Environmental Audit. If a basement is incorporated in any proposed future development of the site, further assessment and the potential design and installation of mitigation measures to manage vapour/odour risks is required. A Statement Condition is included within the Statement of Environmental Audit to this effect. Groundwater at the site is polluted and is not suitable for any beneficial use. Groundwater must not be used for any beneficial use without prior testing and review of results by a suitably qualified professional to confirm its suitability for the proposed use. It may be extracted for the purpose of environmental monitoring or remediation. The beneficial uses 'Water Dependent Ecosystems', 'Potable Water Supply – Desirable', 'Agriculture and Irrigation (irrigation)',

	'Agriculture and Irrigation (stock watering)', 'Water-Based Recreation (primary contact recreation)', 'Industrial and Commercial Use', 'Traditional Owner and Cultural Values' and 'Cultural and Spiritual Values' are precluded by one or more of arsenic, cobalt, lead, iron, nickel, ammonia, nitrate, trichloroethene, vinyl chloride, 1,1-dichloroethane, carbon tetrachloride, 1,2-dichlorobenzene, 1,4-dichlorobenzene, TRH C₆-C₁₀, benzene, 1,1,2-trichloroethane, 1,1-dichloroethene, 1,2-dichloroethane, chloroform, cis-1,2-dichloroethene, dichloromethane, tetrachloroethene, trihalomethanes and xylenes which are not considered to be derived from the site but are regional in nature. Groundwater beneath the site contains naturally elevated concentrations of pH, copper, zinc, sulphate, sodium and chloride. The levels are considered typical of the regional groundwater quality surrounding the site and do not constitute pollution in accordance with pollution in accordance with clause 17(3)(b) of the SEPP (Waters). The site has been declared to be a Groundwater Quality Restricted Use Zone (GQRUZ) (as per the EPA GQRUZ Map attached to the Statement of Environmental Audit in Appendix A of this report).	
Outcome of the audit	Statement of Environmental Audit	
Has EPA determined CUTEF at this site?	Yes	
Has the Auditor determined CUTEF at this site?	The Auditor agrees with EPA's determination that CUTEF has been achieved.	
Has a GQRUZ been identified at the site/beyond the site by EPA?	Yes – the site has been declared as being a GQRUZ.	
Does NAPL remain at the site?	No measurable NAPL has been observed in any well at the Lot 4 site. However, concentrations indicative of potential DNAPL considered to be sourced from off-site (i.e. from Lot 2) were reported within wells MW50B and MW50C.	
Please indicate which of the Protected Beneficial Uses of groundwater are precluded due to pollution	e.g. including site-sourced and regional pollution.	
	Protected Use	Precluded?
	Water Dependent Ecosystems and Species	Yes
	Potable Water Supply (Desirable)	Yes
	Potable Water Supply (Acceptable)	N/A
	Potable Mineral Water Supply	N/A
	Agriculture and Irrigation (irrigation)	Yes

	Agriculture and irrigation (stock watering)	Yes
	Industrial and commercial	Yes
	Water based recreation (primary contact recreation)	Yes
	Traditional Owner cultural values	Yes
	Cultural and spiritual values	Yes
	Buildings and Structures	No
	Geothermal properties	N/A
Historical land use	The site history review identified that the site (and the remainder of the broader former Nuplex facility) was owned by a grazier until the area was subdivided in the 1940s. In 1949 Standard Laboratories Pty Ltd purchased the site (along with Lot 2). Ajax Chemicals acquired this same parcel of land in 1970. In 1981 the site (and Lots 1 and 2 of the wider Nuplex site) was purchased by Searle Australia, then by Clyde Industries in 1983. Asia Pacific Specialty Chemicals (APS) then owned the site between 1997-2017. It is noted that APS was acquired by Nuplex in 2002, hence reference of the wider site as the 'former Nuplex facility'. It is noted that operations of the site (and the wider Nuplex site) under Searle Australia, Clyde Industries and APS Chemicals was for the manufacture of a variety of chemicals, including lubricants, resins and polymer stabilisers. The wider site was most recently operated by Nuplex as a chemical storage and distribution facility. Chandos Bay acquired the site in January 2017. The site has remained vacant since at least the commencement of January 2017	
Current land use	At the commencement of the Audit the site was vacant with the infrastructure of the building remaining in place, but most below ground infrastructure and infrastructure within the building having been removed. One below ground TIT remained in place. At the completion of the Audit, the site remained vacant and unoccupied. The below ground TIT had been removed and validated.	
Proposed future land use	Commercial/industrial use	
Surrounding land use – north	Lot 1 within the remainder of the former Nuplex Facility, beyond which is Bay Road with commercial properties on the northern side of Bay Road including the Rietmans Business Park (formerly a nursery) and a carwash facility (Ezy Bay Wash).	

Surrounding land use – south	Lot 3 within the remainder of the former Nuplex facility, beyond which is a commercial warehouse, DSK Engineering (steel fabrication with a UST onsite) and SK partitions (manufacturer).
Surrounding land use – east	Lot 2 within the remainder of the former Nuplex facility, beyond which is Chandos Street and the Laminex industrial facility on the eastern side of Chandos Street.
Surrounding land use – west	Hamlet Street, beyond which are commercial and light industrial properties including Austral Injections (plastics injection moulding facility) and Endeavor Turf Products (turf supplier).
Proposed land use zoning	Commercial 2 Zone (no known proposed change to current zoning)
Nearest surface water receptor – name	Port Phillip Bay
Nearest surface water receptor – distance (m)	2,700
Nearest surface water receptor – direction	Southwest and west
Likely point of groundwater discharge	Port Phillip Bay
Site aquifer formation	Brighton Group Aquifer
Groundwater flow direction	West to southwest
Groundwater TDS range (mg/L)	174 - 4,588
Groundwater Segment	A1
Are there multiple aquifers impacted by pollution at the site	No
Perched groundwater depth – upper (metres below ground level (mbgl))	N/A
Perched groundwater depth – lower (mbgl)	N/A
Regional groundwater depth – upper (mbgl)	10.00
Regional groundwater depth – lower (mbgl)	11.03
Number of bores within 2 km	419
Closest extractive use (distance in m)	145 m south (domestic and stock)

Zone of groundwater plume influence (m from site boundary)	NA
Year groundwater last monitored	2020
Have you attached electronic copies of Current Groundwater Analytical Results presented as a summary table?	Yes

ENVIRONMENT PROTECTION ACT 1970
STATEMENT OF ENVIRONMENTAL AUDIT

I, Timothy Kent Russell of Maple Auditing Pty Ltd, a person appointed by the Environment Protection Authority ('the Authority') under the *Environment Protection Act 1970* ('the Act') as an Environmental Auditor for the purposes of the Act, having

1. been requested by Mr Andrew Johnston of Chandos Bay Pty Ltd (the owner of the site at the commencement of the Audit) to issue a certificate of environmental audit in relation to the site located at 20 Hamlet Street, Cheltenham, Victoria 3192; defined as Lot 4 on Plan of Subdivision PS802507T (Volume 11973 and Folio 119), ('the site') owned/occupied by Chandos Bay Pty Ltd;
2. had regard to, among other things,
 - (i) guidelines issued by the Authority for the purposes of Part IXD of the Act,
 - (ii) the beneficial uses that may be made of the site
 - (iii) relevant State environment protection policies/industrial waste management policies, namely

SEPP *(Waters)*

SEPP *(Ambient Air Quality & Air Quality Management)*

SEPP *(Prevention and Management of Contamination of Land)*

EPA *Environment Protection (Industrial Waste Resource) Regulations*

in making a total assessment of the nature and extent of any harm or detriment caused to, or the risk of any possible harm or detriment which may be caused to, any beneficial use made of the site by any industrial processes or activity, waste or substance (including any chemical substance), and

3. completed an environmental audit report in accordance with section 53X of the Act, a copy of which has been sent to the Authority and the relevant planning and responsible authority.

HEREBY STATE that I am of the opinion that the site is suitable for the beneficial uses associated with commercial and industrial land uses subject to the following conditions attached thereto:

- A. If a basement (either single or multi-level) is incorporated in any proposed future development of the site, further assessment and the potential design and installation of mitigation measures to manage vapour/odour risks is required. An environmental auditor appointed under Part IXD of the Environment Protection Act 1970 ("the Act") must be engaged to conduct an environmental audit of the site under Section 53X of the Act, to consider this use.
- B. Any landscaped area or garden bed must be constructed and maintained with at least 0.5 m thickness of soil below the finished surface, which is demonstrated to be suitable for the site and consistent with EPA Publication IWRG 621 Soil Hazard Categorisation and Management as 'fill material' (or commercially sourced garden soil such as topsoil or potting mix).

- C. All physical barriers (as prescribed in condition 'B' above), must be maintained on the site and if subsequently damaged or removed during development or occupation of the site, must be reinstated as soon as possible and to the same condition or better as they were prior to any disturbance.
- D. If removal of the physical barrier (as prescribed in condition 'B' above) is proposed, an environmental auditor appointed under Part IXD of the Environment Protection Act 1970 ("the Act") must be engaged to conduct an environmental audit of the site under Section 53X of the Act, to consider if the barrier is no longer required.
- E. Groundwater at the site is polluted and is not suitable for any beneficial use. Groundwater must not be used for any beneficial use without prior testing and review of results by a suitably qualified professional to confirm its suitability for the proposed use. It may be extracted for the purpose of environmental monitoring or remediation.

The condition of the site is detrimental or potentially detrimental to any (one or more) beneficial uses of the site. Accordingly, I have not issued a certificate of environmental audit for the site in its current condition, the reasons for which are presented in the environmental audit report. The terms and conditions that need to be complied with before a certificate of environmental audit may be issued are set out as follows:

- (i) Clean-up of polluted groundwater such that all beneficial uses of groundwater are restored.
- (ii) All chemically unsuitable soils and materials are remediated such that all beneficial uses of land are restored.

Other related information

- 1) On 18 August 2020 the Authority determined that;
 - (i) groundwater had been cleaned up to the extent practicable, and
 - (ii) the site is a Groundwater Quality Restricted Use Zone (GQRUZ). The extent of the GQRUZ is shown on the Authority GQRUZ Figure attached to this Statement of Environmental Audit.
- 2) The beneficial uses 'Water Dependent Ecosystems', 'Potable Water Supply – Desirable', 'Agriculture and Irrigation (irrigation)', 'Agriculture and Irrigation (stock watering)', 'Water-Based Recreation (primary contact recreation)', 'Industrial and Commercial Use', 'Traditional Owner and Cultural Values' and 'Cultural and Spiritual Values' are precluded by one or more of arsenic, cobalt, lead, iron, nickel, ammonia, nitrate, trichloroethene, vinyl chloride, 1,1-dichloroethane, carbon tetrachloride, 1,2-dichlorobenzene, 1,4-dichlorobenzene, TRH C₆-C₁₀, benzene, 1,1,2-trichloroethane, 1,1-dichloroethene, 1,2-dichloroethane, chloroform, cis-1,2-dichloroethene, dichloromethane, tetrachloroethene, trihalomethanes and xylenes which are not considered to be derived from the site but are regional in nature.
- 3) Groundwater beneath the site contains naturally elevated concentrations of pH, copper, zinc, sulphate, sodium and chloride. The levels are considered typical of the regional groundwater quality surrounding the site and do not constitute pollution in accordance with pollution in accordance with clause 17(3)(b) of the SEPP (Waters).
- 4) At the completion of the audit, an ongoing groundwater monitoring program was being implemented for Lot 2 (i.e. through the 53X Audit on Lot 2 and with commitment to post audit groundwater sampling work through a Groundwater Quality Management Plan). Chandos Bay Pty Ltd is the responsible party for all future groundwater monitoring works for Lot 2 and committed to include monitoring of a selection of wells on Lot 3 as part of the Lot 2 GQMP. This was confirmed via a 'Notice to Identify Occupier' between Chandos Bay Pty Ltd and EPA on 1

October 2019. The GQMP states that groundwater monitoring will be implemented over a three year program (March 2020 to September 2022) with bi-annual monitoring. As such there is no specific GQMP requirement for Lot 4 and ongoing groundwater monitoring is being conducted as part of the Lot 2 audit. A copy of the GQMP is provided within Appendix I of this audit report.

- 5) In accordance with Clause 58(4) of the SEPP (Waters) the EPA may require periodic reassessment of the practicability of groundwater clean-up.
- 6) Groundwater monitoring bores present at the site (not required as part of the GQMP) should be decommissioned in accordance with the requirements of the most up to date version of "Minimum Construction Requirements for Water Bores in Australia", published by the Land and Water Biodiversity Committee.
- 7) Asbestos containing material has been reported on the site within the on-site buildings. As part of future site development, asbestos removal works must be conducted in accordance with the Occupational Health & Safety Regulations 2007 (Part 4.3 Asbestos), including the use of an appropriately licensed contractor prior to occupation.
- 8) Any fill or soil imported to the site must be chemically tested soil or fill that classifies as "fill material" in accordance with relevant EPA guidelines.
- 9) Any soils proposed to be excavated from the site and disposed of off-site must be classified and managed in accordance with relevant statutory regulations and EPA guidelines (e.g. IWRG 621).
- 10) Soil at the site contains naturally elevated concentrations pH (slightly acidic). The levels are considered typical of the regional soil quality surrounding the site and do not constitute pollution or represent a health or ecological risk. Local natural plants and grasses and fauna are likely to be adapted to these background levels however there may be some impact on the development of some introduced plants, grasses and fauna.
- 11) In accordance with section 53ZE of the Environment Protection Act 1970, the owner/occupier of the site must provide a copy of this Statement of Environmental Audit to any person who becomes or proposes to become the occupier of the site.

This statement forms part of environmental audit report (*Maple Auditing Pty Ltd, Environmental Audit Report, Lot 4 on PS802507, 20 Hamlet Street, Cheltenham, VIC 3192, Report Number MA115-R02, 28 August 2020*). Further details regarding the condition of the site may be found in the environmental audit report.

DATED 28 August 2020

Signed



ENVIRONMENTAL AUDITOR

Groundwater zone with restricted uses

CHELTENHAM

This zone has been cleaned up to the relevant environmental standards (section 53X environmental audit) but is still subject to restricted groundwater uses.

Environmental audit site

20 HAMLET ST CHELTENHAM VIC 3192

Restrictions on use

Potable water supply (desirable)
Agriculture and irrigation (irrigation)
Agriculture and irrigation (stock watering)
Water-based recreation (primary contact recreation)
Industrial and commercial use

Site history

Chemical manufacturing/storage/blending

Legend

-  Environmental audit site
-  Groundwater zone with restricted uses
-  Properties
-  Unit/house/building number
-  Primary road

