



NSW Site Auditor Scheme

Site Audit Statement

A site audit statement summarises the findings of a site audit. For full details of the site auditor's findings, evaluations and conclusions, refer to the associated site audit report.

This form was approved under the *Contaminated Land Management Act 1997* on 12 October 2017.

For information about completing this form, go to Part IV.

Part I: Site audit identification

Site audit statement no. MP169_01_R1

This site audit is a:

☒ statutory audit

☐ non-statutory audit

within the meaning of the *Contaminated Land Management Act 1997*.

Site auditor details

(As accredited under the *Contaminated Land Management Act 1997*)

Name:

Company: Senversa Pty Ltd

Address: Level 5, The Grafton Bond Building

201 Kent Street, Sydney NSW

Postcode: 2000

Phone:

Email:

Site details

Address: PFAS Material Emplacement Area (PFAS MEA) at former Schofields Aerodrome,
Off Mariner Avenue, Schofields NSW. [Refer to list of street addresses for subdivided lots.]

Postcode: 2762

Property description

(Attach a separate list if several properties are included in the site audit.)

Part of Lot 4100 DP 1261628.

Lot 2314 to 2318 DP 1252016

Lot 2240 to 2241 DP 1252015

[Refer to attached list for current and proposed land parcels as part of the subdivision and attached audit site survey plan.]

Local government area: Blacktown City Council

Area of site (include units, e.g. hectares): 1.81 hectare

Current zoning: R2 (low density residential), RE1 (public recreation) and SP2 (infrastructure)

Regulation and notification

To the best of my knowledge:

☒ ~~the site is the subject of a declaration, order, agreement, proposal or notice under the Contaminated Land Management Act 1997 or the Environmentally Hazardous Chemicals Act 1985, as follows: (provide the no. if applicable)~~

☐ ~~Declaration no.~~

☐ ~~Order no.~~

☐ ~~Proposal no.~~

☐ ~~Notice no.~~

☒ **the site is not** the subject of a declaration, order, proposal or notice under the Contaminated Land Management Act 1997 or the Environmentally Hazardous Chemicals Act 1985.

To the best of my knowledge:

☐ ~~the site has been notified to the EPA under section 60 of the Contaminated Land Management Act 1997~~

☒ the site has not been notified to the EPA under section 60 of the Contaminated Land Management Act 1997.

Site audit commissioned by

Name:

Company: Defence Housing Australia

Address: Suite 2, Level 2/287 Elizabeth Street, Sydney NSW

Postcode: 2000

Phone: 02 8836 5730

Email: [REDACTED]

Contact details for contact person (if different from above)

Name

Phone

Email

Nature of statutory requirements (not applicable for non-statutory audits)

☐ ~~Requirements under the Contaminated Land Management Act 1997
(e.g. management order; please specify, including date of issue)~~

☐ ~~Requirements imposed by an environmental planning instrument
(please specify, including date of issue)~~

☒ Development consent requirements under the Environmental Planning and Assessment Act 1979 (please specify consent authority and date of issue)

Blacktown City Council (DA 18-00972) dated 17 January 2019 (also referred to as Stage 3).

Blacktown City Council Development Consent (DA 21-00925) dated 20 July 2022 (also referred to as stage 6G) for proposed subdivision.

Blacktown City Council Development Consent (DA 15-00999) dated 21 April 2017 for bulk earthworks.

☐ ~~Requirements under other legislation (please specify, including date of issue)~~

Purpose of site audit

☐ ~~A1 To determine land use suitability~~

~~Intended uses of the land:~~

OR

☐ ~~A2 To determine land use suitability subject to compliance with either an active or passive environmental management plan~~

~~Intended uses of the land:~~

OR

(Tick all that apply)

☒ **B1** To determine the nature and extent of contamination

☒ **B2** To determine the appropriateness of:

☒ an investigation plan

☐ a remediation plan

☐ a management plan

☐ ~~B3 To determine the appropriateness of a site testing plan to determine if groundwater is safe and suitable for its intended use as required by the Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017~~

☐ ~~B4 To determine the compliance with an approved:~~

☐ ~~voluntary management proposal or~~

☐ ~~management order under the Contaminated Land Management Act 1997~~

~~**B5** To determine if the land can be made suitable for a particular use (or uses) if the site is remediated or managed in accordance with a specified plan.~~

~~Intended uses of the land:~~

Information sources for site audit

Consultancies which conducted the site investigations and/or remediation:

Ramboll Australia Pty Ltd (Ramboll)

JBS Environmental Pty Ltd (JBS)

ENVIRON Australia Pty Ltd (Environ)

Titles of reports reviewed:

PFAS Validation Report, Former Schofields Aerodrome, draft, revision D4, prepared by Ramboll dated 12 February 2021

Former Schofields Aerodrome, Quakers Hill, NSW: Screening Assessment of Potential Risks from the PFAS Impacted Soil Layer, draft, revision D1, prepared by Ramboll dated 29 January 2021

PFAS Validation Report, Former Schofields Aerodrome, draft, revision D5, prepared by Ramboll dated 5 March 2021

Former Schofields Aerodrome, Quakers Hill, NSW: Screening Assessment of Potential Risks from the PFAS Impacted Soil Layer, draft, revision D2, prepared by Ramboll dated 22 March 2021

PFAS Validation Report, Former Schofields Aerodrome, draft, revision D6, prepared by Ramboll dated 8 April 2021

Former Schofields Aerodrome, Quakers Hill, NSW: Screening Assessment of Potential Risks from the PFAS Impacted Soil Layer, final, revision F1, prepared by Ramboll dated 13 April 2021.

Former Schofields Aerodrome, Quakers Hill, NSW: Screening Assessment of Potential Risks from the PFAS Impacted Soil Layer, final, revision F2, prepared by Ramboll dated 16 April 2021. (Provided as Appendix 8 of final PFAS Validation Report.)

PFAS MEA Validation Report, Former Schofields Aerodrome, draft, revision D8, prepared by Ramboll dated 3 May 2021.

PFAS MEA Validation Report, Former Schofields Aerodrome, final, revision F1, prepared by Ramboll dated 21 May 2021.

Other information reviewed, including previous site audit reports and statements relating to the site:

Site Audit Report – Part of Former Schofields Aerodrome, Lot 400 in DP1171596, audit number GN481, prepared by Environ dated September 2013.

Targeted Phase 2 PFAS Site Investigation, Former Schofields Aerodrome Quakers Hill NSW, prepared by Ramboll dated November 2017.

PFAS Leachate Analysis – Former Schofields Aerodrome, prepared by Ramboll dated 31 May 2018.

Site audit report details

Title: Site Audit Report, PFAS Material Emplacement Area (PFAS MEA)

Report no: MP169_01 (Senversa Ref: S18612_002_SAR) Date: 22 June 2021

Part II: Auditor's findings

Please complete either Section A1, Section A2 or Section B, not more than one section.
(Strike out the irrelevant sections.)

- Use **Section A1** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **without the implementation** of an environmental management plan.
- Use **Section A2** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **with the implementation** of an active or passive environmental management plan.
- Use **Section B** where the audit is to determine:
 - (B1) the nature and extent of contamination, and/or
 - (B2) the appropriateness of an investigation, remediation or management plan¹, and/or
 - (B3) the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or
 - (B4) whether the terms of the approved voluntary management proposal or management order have been complied with, and/or
 - (B5) whether the site can be made suitable for a specified land use (or uses) if the site is remediated or managed in accordance with the implementation of a specified plan.

¹ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

Section A1

~~I certify that, in my opinion:~~

The ~~site is suitable~~ for the following uses:

~~(Tick all appropriate uses and strike out those not applicable.)~~

- ☐ ~~Residential, including substantial vegetable garden and poultry~~
 - ☐ ~~Residential, including substantial vegetable garden, excluding poultry~~
 - ☐ ~~Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
 - ☐ ~~Day care centre, preschool, primary school~~
 - ☐ ~~Residential with minimal opportunity for soil access, including units~~
 - ☐ ~~Secondary school~~
 - ☐ ~~Park, recreational open space, playing field~~
 - ☐ ~~Commercial/industrial~~
 - ☐ ~~Other (please specify):~~
-

OR

☐ ~~I certify that, in my opinion, the **site is not suitable** for any use due to the risk of harm from contamination.~~

Overall comments:

Section A2

I certify that, in my opinion:

Subject to compliance with the ~~attached~~ environmental management plan² (EMP), the site is suitable for the following uses:

(Tick all appropriate uses and strike out those not applicable.)

- ☐ ~~Residential, including substantial vegetable garden and poultry~~
- ☐ ~~Residential, including substantial vegetable garden, excluding poultry~~
- ☐ ~~Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
- ☐ ~~Day care centre, preschool, primary school~~
- ☐ ~~Residential with minimal opportunity for soil access, including units~~
- ☐ ~~Secondary school~~
- ☐ ~~Park, recreational open space, playing field~~
- ☐ ~~Commercial/industrial~~
- ☐ ~~Other (please specify):~~

EMP details

Title:

Author:

Date:

No. of pages:

EMP summary

This EMP (attached) is required to be implemented to address residual contamination on the site.

The EMP: (Tick appropriate box and strike out the other option.)

- ☐ ~~requires operation and/or maintenance of active control systems³~~
- ☐ ~~requires maintenance of passive control systems only³.~~

² Refer to Part IV for an explanation of an environmental management plan.

³ Refer to Part IV for definitions of active and passive control systems.

Purpose of the EMP:

Description of the nature of the residual contamination:

Summary of the actions required by the EMP:

How the EMP can reasonably be made to be legally enforceable:

How there will be appropriate public notification:

Overall comments:

Section B

Purpose of the plan⁴ which is the subject of this audit:

To confirm the following:

-
- nature and extent of the PFAS material emplacement layer.

 - whether the risk to human health and the environment posed by the PFAS material emplacement layer for the current and approved uses is acceptable, given the current configuration of the PFAS material emplacement area.

 - whether the audit site is suitable for current and approved uses with respect to PFAS contamination.

-
-

I certify that, in my opinion:

(B1)

- ☒ The nature and extent of the contamination has been appropriately determined
- ☐ ~~The nature and extent of the contamination has not been appropriately determined~~

AND/OR (B2)

- ☒ The investigation, remediation or management plan is appropriate for the purpose stated above
- ☐ ~~The investigation, remediation or management plan is not appropriate for the purpose stated above~~

AND/OR (B3)

- ☐ ~~The site testing plan:~~
- ☐ ~~is appropriate to determine~~
 - ☐ ~~is not appropriate to determine~~

~~if groundwater is safe and suitable for its intended use as required by the Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017~~

AND/OR (B4)

- ☐ ~~The terms of the approved voluntary management proposal* or management order** (strike out as appropriate):~~
- ☐ ~~have been complied with~~
 - ☐ ~~have not been complied with.~~

~~*voluntary management proposal no.~~

~~**management order no.~~

⁴ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

AND/OR (B5)

☐ The site can be made suitable for the following uses:

(Tick all appropriate uses and strike out those not applicable.)

- ☐ Residential, including substantial vegetable garden and poultry
- ☐ Residential, including substantial vegetable garden, excluding poultry
- ☐ Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry
- ☐ Day care centre, preschool, primary school
- ☐ Residential with minimal opportunity for soil access, including units
- ☐ Secondary school
- ☐ Park, recreational open space, playing field
- ☐ Commercial/industrial
- ☐ Other (please specify):

IF the site is remediated/managed* in accordance with the following plan (attached):

*Strike out as appropriate

Plan title

Plan author

Plan date

No. of pages

SUBJECT to compliance with the following condition(s):

Overall comments:

PFAS impacted soil was mixed with virgin excavated natural material and placed at a depth greater than 3 m below the current site surface. The PFAS material emplacement area was successfully validated. It is recommended that a Construction Environmental Management Plan (CEMP) be prepared for the construction of the school to manage any works below 3 m depth within the PFAS material emplacement area footprint.

The audit site is suitable for the following uses with respect to PFAS contamination:

- ☒ Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry
- ☒ Day care centre, preschool, primary school
- ☒ Residential with minimal opportunity for soil access, including units

☒ Secondary school

☒ Park, recreational open space, playing field

☒ Commercial/industrial

☒ Other (please specify): SP2-drainage.

Part III: Auditor's declaration

I am accredited as a site auditor by the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997*.

Accreditation no. [REDACTED]

I certify that:

- I have completed the site audit free of any conflicts of interest as defined in the *Contaminated Land Management Act 1997*, and
- with due regard to relevant laws and guidelines, I have examined and am familiar with the reports and information referred to in Part I of this site audit, and
- on the basis of inquiries I have made of those individuals immediately responsible for making those reports and obtaining the information referred to in this statement, those reports and that information are, to the best of my knowledge, true, accurate and complete, and
- this statement is, to the best of my knowledge, true, accurate and complete.

I am aware that there are penalties under the *Contaminated Land Management Act 1997* for wilfully making false or misleading statements.

Signed [REDACTED]

Date 22 June 2021

Part IV: Explanatory notes

To be complete, a site audit statement form must be issued with all four parts.

How to complete this form

Part I

Part I identifies the auditor, the site, the purpose of the audit and the information used by the auditor in making the site audit findings.

Part II

Part II contains the auditor's opinion of the suitability of the site for specified uses or of the appropriateness of an investigation, or remediation plan or management plan which may enable a particular use. It sets out succinct and definitive information to assist decision-making about the use or uses of the site or a plan or proposal to manage or remediate the site.

The auditor is to complete either Section A1 or Section A2 or Section B of Part II, **not** more than one section.

Section A1

In Section A1 the auditor may conclude that the land is *suitable* for a specified use or uses OR *not suitable* for any beneficial use due to the risk of harm from contamination.

By certifying that the site is *suitable*, an auditor declares that, at the time of completion of the site audit, no further investigation or remediation or management of the site was needed to render the site fit for the specified use(s). **Conditions must not be** imposed on a Section A1 site audit statement. Auditors may include **comments** which are key observations in light of the audit which are not directly related to the suitability of the site for the use(s). These observations may cover aspects relating to the broader environmental context to aid decision-making in relation to the site.

Section A2

In Section A2 the auditor may conclude that the land is *suitable* for a specified use(s) subject to a condition for implementation of an environmental management plan (EMP).

Environmental management plan

Within the context of contaminated sites management, an EMP (sometimes also called a 'site management plan') means a plan which addresses the integration of environmental mitigation and monitoring measures for soil, groundwater and/or hazardous ground gases throughout an existing or proposed land use. An EMP succinctly describes the nature and location of contamination remaining on site and states what the objectives of the plan are, how contaminants will be managed, who will be responsible for the plan's implementation and over what time frame actions specified in the plan will take place.

By certifying that the site is suitable subject to implementation of an EMP, an auditor declares that, at the time of completion of the site audit, there was sufficient information satisfying guidelines made or approved under the *Contaminated Land Management Act 1997*

(CLM Act) to determine that implementation of the EMP was feasible and would enable the specified use(s) of the site and no further investigation or remediation of the site was needed to render the site fit for the specified use(s).

Implementation of an EMP is required to ensure the site remains suitable for the specified use(s). The plan should be legally enforceable: for example, a requirement of a notice under the CLM Act or a development consent condition issued by a planning authority. There should also be appropriate public notification of the plan, e.g. on a certificate issued under s.149 of the *Environmental Planning and Assessment Act 1979*.

Active or passive control systems

Auditors must specify whether the EMP requires operation and/or maintenance of active control systems or requires maintenance of passive control systems only. Active management systems usually incorporate mechanical components and/or require monitoring and, because of this, regular maintenance and inspection are necessary. Most active management systems are applied at sites where if the systems are not implemented an unacceptable risk may occur. Passive management systems usually require minimal management and maintenance and do not usually incorporate mechanical components.

Auditor's comments

Auditors may also include **comments** which are key observations in light of the audit which are not directly related to the suitability of the site for the use(s). These observations may cover aspects relating to the broader environmental context to aid decision-making in relation to the site.

Section B

In Section B the auditor draws conclusions on the nature and extent of contamination, and/or suitability of plans relating to the investigation, remediation or management of the land, and/or the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or whether the terms of an approved voluntary management proposal or management order made under the CLM Act have been complied with, and/or whether the site can be made suitable for a specified land use or uses if the site is remediated or managed in accordance with the implementation of a specified plan.

By certifying that a site *can be made suitable* for a use or uses if remediated or managed in accordance with a specified plan, the auditor declares that, at the time the audit was completed, there was sufficient information satisfying guidelines made or approved under the CLM Act to determine that implementation of the plan was feasible and would enable the specified use(s) of the site in the future.

For a site that *can be made suitable*, any **conditions** specified by the auditor in Section B should be limited to minor modifications or additions to the specified plan. However, if the auditor considers that further audits of the site (e.g. to validate remediation) are required, the auditor must note this as a condition in the site audit statement. The condition must not specify an individual auditor, only that further audits are required.

Auditors may also include **comments** which are observations in light of the audit which provide a more complete understanding of the environmental context to aid decision-making in relation to the site.

Part III

In **Part III** the auditor certifies their standing as an accredited auditor under the CLM Act and makes other relevant declarations.

Where to send completed forms

In addition to furnishing a copy of the audit statement to the person(s) who commissioned the site audit, statutory site audit statements must be sent to

- the **NSW Environment Protection Authority**:
nswauditors@epa.nsw.gov.au or as specified by the EPA

AND

- the **local council** for the land which is the subject of the audit.

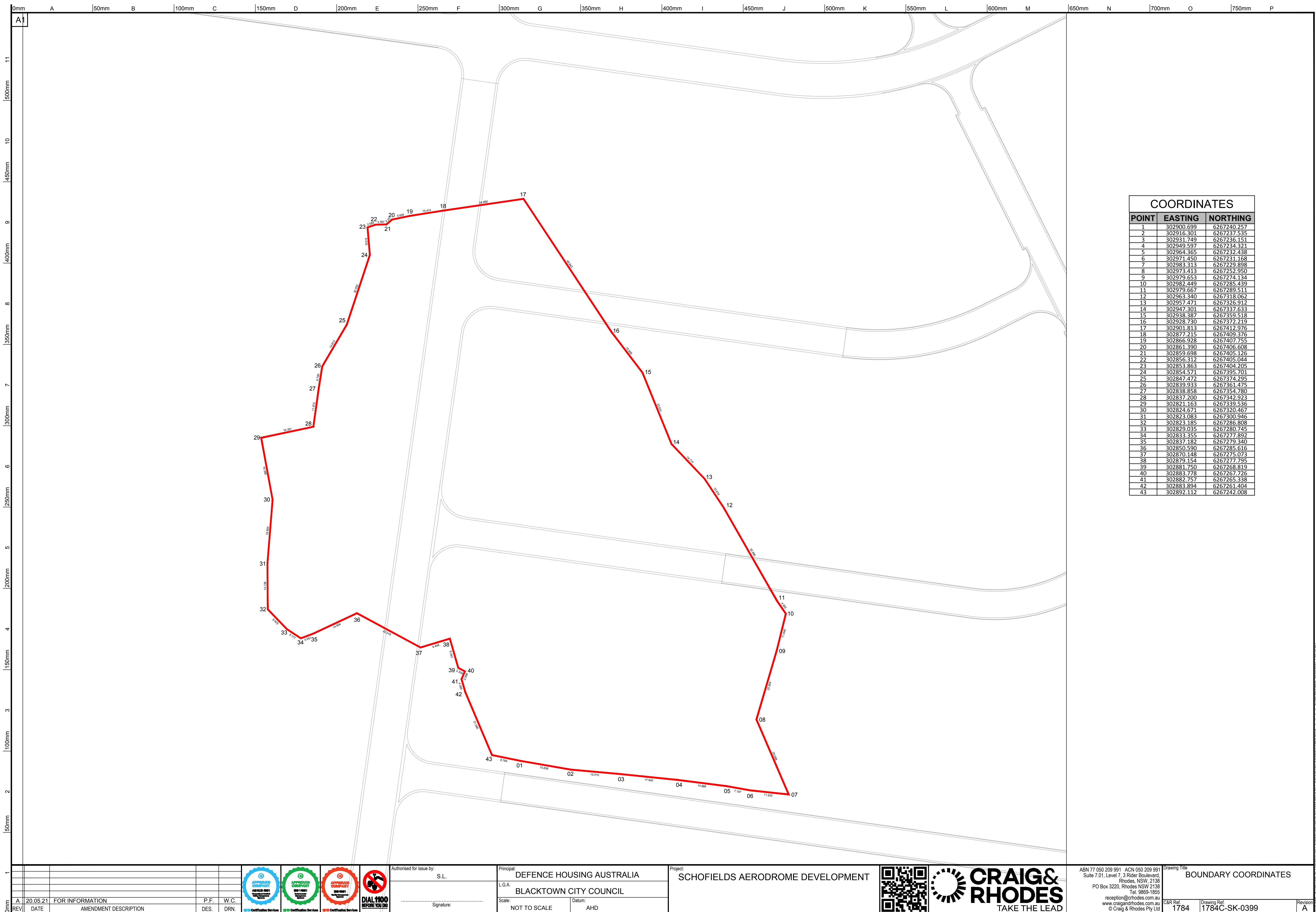
List of Street Addresses and Current/Proposed Land Parcels within the Audit Site

Street Address	Primary Plan/Lot Plan	Development Stage Reference	Type
14 Dolphin Street, Nirimba Fields NSW 2763	2240/DP1252015	Stage 3	Constructed
16 Dolphin Street, Nirimba Fields NSW 2763	2241/DP1252015	Stage 3	Constructed
9 Swordfish Street, Nirimba Fields NSW 2763	2318/DP1252016	Stage 3	Constructed
11 Swordfish Street, Nirimba Fields NSW 2763	2317/DP1252016	Stage 3	Constructed
13 Swordfish Street, Nirimba Fields NSW 2763	2316/DP1252016	Stage 3	Constructed
15 Swordfish Street, Nirimba Fields NSW 2763	2315/DP1252016	Stage 3	Constructed
17 Swordfish Street, Nirimba Fields NSW 2763	2314/DP1252016	Stage 3	Constructed
To be announced (TBA)	6318/DP1266450	Stage 6d	Under construction
TBA	6318/DP1266450	Stage 6d	Under construction
TBA	6319/DP1266450	Stage 6d	Under construction
TBA	6320/DP1266450	Stage 6d	Under construction
TBA	6328/DP1266450	Stage 6d	Under construction
TBA	6329/DP1266450	Stage 6d	Under construction
TBA	6330/DP1266450	Stage 6d	Under construction
TBA	6331/DP1266450	Stage 6d	Under construction
TBA	6332/DP1266450	Stage 6d	Under construction
TBA	6333/DP1266450	Stage 6d	Under construction
TBA	6334/DP1266450	Stage 6d	Under construction

Street Address	Primary Plan/Lot Plan	Development Stage Reference	Type
TBA	6335/DP1266450	Stage 6d	Under construction
TBA	6336/DP1266450	Stage 6d	Under construction
TBA	6337/DP1266450	Stage 6d	Under construction
TBA	6338/DP1266450	Stage 6d	Under construction
TBA	6339/DP1266450	Stage 6d	Under construction
TBA	6405/DP1267749	Stage 6e	Under construction
TBA	6406/DP1267749	Stage 6e	Under construction
TBA	6407/DP1267749	Stage 6e	Under construction
TBA	6408/DP1267749	Stage 6e	Under construction
TBA	6409/DP1267749	Stage 6e	Under construction
TBA	6410/DP1267749	Stage 6e	Under construction
TBA	6411/DP1267749	Stage 6e	Under construction
TBA	6412/DP1267749	Stage 6e	Under construction
TBA	6413/DP1267749	Stage 6e	Under construction
TBA	6414/DP1267749	Stage 6e	Under construction
TBA	6415/DP1267749	Stage 6e	Under construction
TBA	6416/DP1267749	Stage 6e	Under construction
TBA	6417/DP1267749	Stage 6e	Under construction
TBA	6418/DP1267749	Stage 6e	Under construction

Street Address	Primary Plan/Lot Plan	Development Stage Reference	Type
TBA	6419/DP1267749	Stage 6e	Under construction
TBA	6420/DP1267749	Stage 6e	Under construction
TBA	6421/DP1267749	Stage 6e	Under construction
980 - District Park – Unique Property Reference Number (UPRN) - 4967086		Stage 6G	Part of residual lot
School Site - UPRN - 4967127		Stage 6G	Part of residual lot

Source: Data provided by DHA to the auditor on 6 April 2021.



COORDINATES

POINT	EASTING	NORTHING
1	302900.699	6267240.257
2	302916.301	6267237.535
3	302916.749	6267236.151
4	302949.597	6267231.321
5	302964.365	6267232.438
6	302971.450	6267231.168
7	302983.313	6267229.898
8	302973.413	6267252.590
9	302938.383	6267241.134
10	302982.449	6267238.939
11	302979.667	6267289.511
12	302963.340	6267318.062
13	302957.471	6267326.912
14	302947.301	6267337.633
15	302938.387	6267359.518
16	302928.300	6267371.919
17	302901.813	6267412.976
18	302877.215	6267409.376
19	302866.928	6267407.755
20	302861.390	6267406.608
21	302859.698	6267405.126
22	302856.312	6267405.044
23	302853.863	6267404.205
24	302854.571	6267395.701
25	302847.472	6267374.295
26	302839.933	6267361.475
27	302838.858	6267354.780
28	302829.700	6267347.023
29	302821.163	6267339.536
30	302824.671	6267320.467
31	302823.083	6267320.946
32	302823.185	6267286.808
33	302825.035	6267280.745
34	302833.355	6267278.892
35	302837.182	6267276.840
36	302850.590	6267285.616
37	302870.148	6267275.073
38	302879.154	6267277.795
39	302881.750	6267268.819
40	302880.778	6267267.726
41	302882.857	6267267.338
42	302883.894	6267261.040
43	302892.112	6267242.008