

Application of a restricted scope in a site contamination audit

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EPA 1078/15: This information sheet a general introduction to the application and documentation of a restricted scope for a site contamination audit. It is designed to assist people using the audit system and is intended to be read in conjunction with the information sheets, [Overview of the site contamination audit system](#), [Site contamination auditors](#) and [Site contamination audit reports and audit statements](#). For detailed guidance on the audit system, refer to the [Guidelines for the site contamination audit system](#).

Introduction

In South Australia, the *Environment Protection Act 1993* (the Act) and *Environment Protection Regulations 2009* (the Regulations) establish the legislative framework for managing site contamination¹ and the site contamination audit system² (audit system). The audit system and the accreditation and use of site contamination auditors are key strategies in the management of site contamination in South Australia. The audit system is a critical link between the site contamination status of land, the suitability of land for its current or proposed use, and planning and development processes.

The Environment Protection Authority (EPA) is responsible for the administration of the audit system, the accreditation of site contamination auditors (auditors) and ensuring that site contamination audits (audits) are carried out according to the legislation and relevant guidelines.

This information sheet provides a general introduction to the application and documentation of a restricted scope for a site contamination audit. The application and documentation of a restricted scope are subject to mandatory guideline requirements for auditors. Refer to the *Guidelines for the site contamination audit system* for further information. The general steps in the completion of an audit are shown in Figure 1 below.



Figure 1 Steps in an audit

¹ Site contamination is defined in section 5B of the Act. Refer to the EPA publication, [Guidelines for the assessment and remediation of site contamination](#).

² The site contamination audit system came into operation on 1 July 2009. In South Australia, between October 1995 and the audit system coming into operation in 2009, the EPA endorsed the use of environmental auditors (contaminated land).

What is a restricted scope?

An audit scope may be restricted in relation to the potential impact of any known or suspected site contamination resulting from an activity³ on one or more elements of the environment. An activity may be taken to include all or specified parts of that activity. An audit scope may also be restricted to one or more of the chemical substances comprising the site contamination. The applicability of a restricted scope will be informed by the reason and purpose(s) of the audit.

Where a restricted scope is to be applied, an audit must only be carried out for the purposes of determining the nature and extent of any site contamination, and what remediation is or remains necessary for another use or range of uses (if appropriate).

Where it is appropriate for a restricted scope to be applied, the objectives are to be agreed to by the auditor and the client, documented, notified to the EPA and reported in accordance with the [Guidelines for the site contamination audit system](#).

Elements of the environment

An element of the environment⁴ means any of the principal constituent parts of the environment that may be impacted by site contamination. The elements of the environment that should be considered in an audit include:

- land (includes soil, sediments and soil vapour)
- air (includes any layer of the atmosphere)—in relation to site contamination it is expected this will typically consider air quality (volatile emissions and dust)
- water, meaning:
 - water occurring naturally above or under the ground
 - water introduced to an aquifer or other area under the ground
 - an artificially created body of water or stream for public use or enjoyment.
- organisms
- ecosystems
- human-made or modified structures or areas
- amenity values (eg odour, aesthetics).

One or more elements of the environment may be specified as being considered for a restricted scope. In identifying the elements to be included, consideration should be given to the likely or known impact of site contamination on each of the principal elements of the environment, taking into account the reason and purpose of the audit.

Applying a restricted scope

An audit subject to a restricted scope is not suitable to be relied upon by a planning authority for the purpose of making determinations as to whether land is suitable for a sensitive use or another use or range of uses. A restricted scope may be applied at a site subject to regulatory requirements under the Act, for example a voluntary proposal or order.

Examples of when a restricted scope may be applied to an audit include assessing:

- the nature and extent of one or more chemical substances in groundwater contamination originating from a site
- risks from known or suspected site contamination to receptors outside the site (ie offsite)

³ Section 3(1) of the Act.

⁴ A definition of environment is provided in section 3(1) of the Act, also refer to the Glossary.

- risk for landfill gas migration from a landfill to adjacent land
- effectiveness of a remediation plan following its implementation.

Refer to the *Guidelines of the site contamination audit system* for further information regarding mandatory guideline requirements applying to auditors in applying a restricted scope.

The general process for applying a restricted scope is shown in Figure 2.

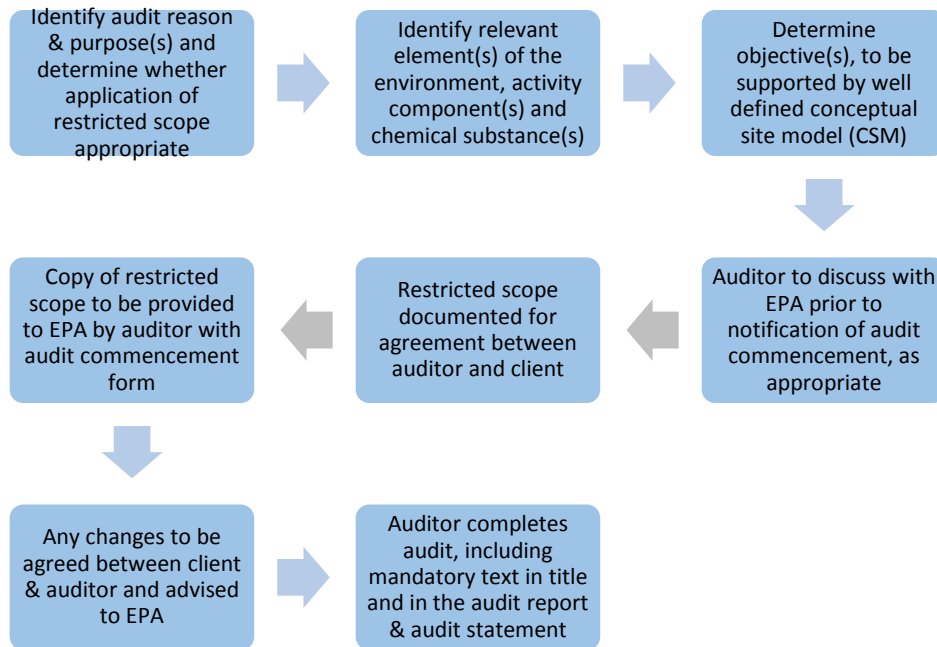


Figure 2 Restricted scope process

Identifying the objectives of a restricted scope

The objectives of restricting the scope of an audit may range from an assessment of multiple elements for a complex activity (such as large industrial premises) to a focused assessment of the impacts of a specific activity on a single element of site contamination.

The objectives of a restricted scope should be supported by a well-defined conceptual site model prepared in accordance with the [National Environment Protection \(Assessment of site contamination\) Measure 1999](#) and the EPA publication, [Guidelines for the assessment and remediation of site contamination](#).

A restricted scope may have multiple objectives and include, for example:

- assessment as to whether risks from known or suspected site contamination have been adequately remediated
- identification of risks from known or suspected site contamination arising from an activity and an order of priority by which they should be addressed
- an independent assessment of the environmental performance of an activity and its relationship to known or suspected site contamination.
- If a restricted scope is being applied to assess risks associated with off-site contamination arising from the audit site, auditors should discuss the restricted scope with the EPA prior to the commencement of an audit.

Review of the conceptual site model and risk assessment in accordance with the ASC NEPM may be used to refine which elements of the environment or components of the activity are to be included in the restricted scope during the audit process. It may result in the restricted scope being varied to focus on those issues which present the most significant risk of harm to human health and/or the environment. Generally, this would involve a process of hazard

identification, analysis of risks (assessment of likelihood, consequence and impact) and categorisation of the risks. The restricted scope may then focus on high-risk areas. If proposed, it is important to document how this process will be used.

Where a restricted scope is being applied at a site subject to regulation requirements, the EPA will review the restricted scope to ensure consistency with the regulatory requirements. In these circumstances, discussions with the EPA in preparing the scope would be beneficial to ensure that any relevant regulatory requirements are being addressed.

Documenting a restricted scope

The matters to be identified in the restricted scope are to include, as appropriate:

- the objective(s) of the restricted scope
- the activity undertaken (in respect of which the restricted scope is to be applied)
- specific component(s) of the activity to be considered
- specific element(s) of the environment to be considered
- specific chemical substances to be considered
- the period of time over which the restricted scope is to be conducted
- any exclusions from the restricted scope.

Where a restricted scope has been applied, this must be identified in the title of an audit report and in the audit statement. Refer to the [Guidelines of the site contamination audit system](#) for further information regarding mandatory guideline requirements applying to auditors in documenting a restricted scope.

Further information

Legislation

[Online legislation](#) is freely available. Copies of legislation are available for purchase from:

Service SA Government Legislation Outlet
Adelaide Service SA Centre
108 North Terrace
Adelaide SA 5000

Telephone: 13 23 24
Facsimile: (08) 8204 1909
Website: <shop.service.sa.gov.au>
Email: <ServiceSAcustomerservice@sa.gov.au>

General information

Environment Protection Authority
GPO Box 2607
Adelaide SA 5001

Telephone: (08) 8204 2004
Facsimile: (08) 8124 4670
Freecall: 1800 623 445 (country)
Website: <www.epa.sa.gov.au>
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