

Environment Protection Authority

Site contamination

Guideline for assessment of underground storage systems

**Draft for consultation – this document must not be cited or
use for any purpose until finalised**

Site Contamination – Guideline for assessment of underground storage systems

For further information please contact:

Information Officer
Environment Protection Authority
GPO Box 2607
Adelaide SA 5001

Telephone: (08) 8204 2004
Facsimile: (08) 8124 4670
Free call (country): 1800 623 445

Website: <https://www.epa.sa.gov.au>

Email: epainfo@sa.gov.au

ISBN 978-1-876562-85-4

Issued July 2019

Disclaimer

This publication is a guide only and does not necessarily provide adequate information in relation to every situation. This publication seeks to explain your possible obligations in a helpful and accessible way. In doing so, however, some detail may not be captured. It is important, therefore, that you seek information advice regarding your obligations, including legal advice.

© Environment Protection Authority

This document may be reproduced in whole or part for the purpose of study or training, subject to the inclusion of an acknowledgment of the source and to it not being used for commercial purposes or sale. Reproduction for purposes other than those given above requires the prior written permission of the Environment Protection Authority.

Contents

Abbreviations	1
1 Introduction	3
1.1 Purpose	3
1.2 Application of the guideline	3
1.3 Currency of this guideline	4
1.4 Protection of the environment during assessment.....	4
1.5 Community engagement and risk communication.....	4
1.6 Work health and safety	4
1.7 Acknowledgments.....	4
2 Assessment	5
2.1 Introduction	5
2.2 Preliminary site investigation	5
2.3 Conceptual site model	6
2.4 Chemicals (substances) of interest.....	7
2.5 Detailed site investigation	7
2.6 Data quality objectives and sampling and analysis quality plan	8
2.7 Soil assessment.....	8
2.8 Groundwater monitoring and assessment.....	11
2.9 Vapour assessment	14
2.10 Risk assessment.....	14
3 Remediation	15
4 Reporting	16

List of tables

Table 1	Minimum recommended soil sampling (not including QA/QC).....	10
Table 2	Recommended groundwater monitoring well locations	13

Abbreviations

ASC NEPM	<i>National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013)</i>
AST	above ground storage tank
COI	chemicals (substance) of interest
CRC CARE	Cooperative Research Centre for Contamination Assessment and Remediation of the Environment
CSM	conceptual site model
DNAPL	dense non-aqueous phase liquid
DQO(s)	data quality objective(s)
DSI	detailed site investigation
EPA	South Australian Environment Protection Authority
EP Act	<i>Environment Protection Act 1993</i>
EPP	environment protection policy
EP Regulations	<i>Environment Protection Regulations 2009</i>
LNAPL	light non-aqueous phase liquid
NAPL	non-aqueous phase liquid
PAH	polycyclic aromatic hydrocarbon
PCA	potentially contaminating activity
PID	photo-ionisation detector
PSI	preliminary site investigation
QA/QC	quality assurance/quality control
ROA	remediation options assessment
RVR	remediation validation reporting
SAQP	sampling and analysis quality plans
SRP	site remediation plan
SSRA	site-specific risk assessment
USS	underground storage systems
UST	underground storage tank
VI	vapour intrusion
VOC(s)	volatile organic compound(s)

1 Introduction

The South Australian Environment Protection Authority (EPA) has prepared this guideline to describe the expected approach to risk-based assessment of site contamination in relation to underground storage systems (USS).

This guideline has primarily been prepared to provide information to site contamination consultants (consultants) and site contamination auditors (auditors) undertaking the assessment of site contamination in relation to USS. It also informs owners and operators of any site containing USS.

This guideline will ensure the assessment of site contamination associated with USS and related infrastructure is conducted to an appropriate standard in South Australia.

This document should be read in conjunction with the following EPA publications:

- [Guidelines for the assessment and remediation of site contamination](#) (2018)
- [Guideline for the assessment of background concentrations](#) (2018)
- [Site contamination – Regulatory and orphan site management framework](#) (2017).

Site contamination publications are available on the EPA website¹.

1.1 Purpose

The assessment of site contamination associated with USS may be undertaken for a number of reasons including due diligence, redevelopment, system upgrades, environmental assessment following loss of containment and release of stored liquid to the environment, condition of licence or as may be required under the [Environment Protection Act \(1993\)](#) (the EP Act).

The guideline has been prepared to align and promote the policy framework and guidance in the *National Environment Protection (Assessment of Site Contamination) Measure 1999 as amended in 2013* (ASC NEPM) and relevant EPA guidelines.

The [ASC NEPM](#) (including any amendments and errata) is available for download from the ComLaw website². The website for the former Standing Council on Environment and Water (SCEW) provides supporting information about the ASC NEPM, including frequently asked questions, errata and the ASC NEPM Toolbox³.

1.2 Application of the guideline

USS are most often associated with the storage of petroleum products, commonly referred to as underground petroleum storage systems or UPSS. Other hazardous substances, including waste products, may also be stored in underground tanks. For the purpose of this guideline USS includes, but is not limited to, any tank, vessel, pipework, delivery system and any other infrastructure associated with the storage, transfer and/or dispensing of liquids or hazardous substances that are installed either totally or partially below the ground. USS are generally located at retail fuel outlets such as service stations, and are also used by other industries such as maintenance and logistics depots, commercial/industrial facilities, marinas, and for standby generators, heating and waste oil.

USS are one of the major sources of soil and groundwater contamination in South Australia. Due to the potential for leakage of product to the environment, approximately 45% of all site contamination records held by the EPA are associated with sites containing USS. The resulting environmental harm⁴ or site contamination⁵ that may result from

¹ <https://www.epa.sa.gov.au>

² www.comlaw.gov.au

³ www.scew.gov.au/nepms/assessment-site-contamination

⁴ As defined in section 5 of the EP Act

⁵ As defined in section 5B of the EP Act

USS, may present a risk to human health and/or the environment and impact on the acceptability of the site, or nearby sites, for their current or proposed use.

The assessment of sites containing USS present the following challenges:

- Location of sites adjacent to sensitive receptors such as residential land use and receiving environments (ie surface water bodies, creeks and streams).
- The characteristics of the substance stored within the USS can lead to the off-site migration of chemicals in soil, vapour and groundwater.
- Limited information in relation to the size, location and age of USS infrastructure, including any changes in configuration, repairs or failures of the system that may have occurred historically.
- Access and disruption issues while undertaking intrusive assessment works to characterise the site contamination status of the site.

1.3 Currency of this guideline

This guideline describes industry best practice in the assessment of site contamination associated with USS in line with relevant legislation, policies and standards. It replaces EPA publication *Guideline for Assessment of underground storage systems* (EPA 2005).

1.4 Protection of the environment during assessment

There should be appropriate protection of the environment during site assessment and remediation of site contamination. Section 1.7 of the EPA publication *Guidelines for the assessment and remediation of site contamination (2018)* and Schedule B2, section 15 of the ASC NEPM provides minimum measures that should be adopted to ensure the protection of the environment during site assessment.

Causing environmental harm (including serious or material environmental harm or environmental nuisance) is an offence under the EP Act and further regulatory action may be taken by the EPA. For information relating to the EPA's regulation of general environmental duty and the environmental harm provisions of the EP Act, refer to [Compliance and enforcement regulatory options and tools](#) (EPA 2009).

1.5 Community engagement and risk communication

Community engagement and risk communication in relation to site contamination should be carried out by a suitably qualified and experienced person and in accordance with the principles and approach provided in the Schedule B8 of the ASC NEPM and the EPA publication [Site contamination guideline for communication and engagement](#) (2016).

The EPA expects that an odour management plan will form part of any community engagement program.

1.6 Work health and safety

USS can contain hazardous and explosive substances. Working near or with USS can present significant risks that must be assessed and managed. This guideline does not detail the work health and safety requirements for the assessment of sites containing USS. There should be appropriate work health and safety measures in place for any person involved in the assessment of USS in accordance with the [Work Health and Safety Act 2012](#) and [Work Health and Safety Regulations 2012](#), and guidance issued by [SafeWork SA](#) and other relevant organisations.

1.7 Acknowledgments

The EPA acknowledges the assistance of the New South Wales EPA and its publications in the development of this guideline.

2 Assessment

2.1 Introduction

Part 3 of the EPA publication *Guidelines for the assessment and remediation of site contamination* (2018) details the recommended process for the assessment of site contamination in South Australia. In addition, Schedules A and B2 of the ASC NEPM outline and provide direction on the tiered-risk approach for the assessment of site contamination. The ASC NEPM states 'adequate site characterisation is the foundation for appropriate assessment of health and environmental risks associated with site contamination'. The assessment process should consider the entire site, not just the USS.

The assessment of USS should only be undertaken by suitability qualified and experienced site contamination consultants or certified site contamination practitioners, as defined in the EP Act and EPA guidelines and policies.

Many site assessments proceed in multiple stages due to the complexity of site conditions and contaminant properties, and/or the discovery of unexpected contamination. Poorly planned and executed site assessments are likely to result in time delays and additional costs (both during the assessment and any subsequent remediation) and inadequate or misleading data which may result in risks to human health and/or the environment not being addressed (ASC NEPM, Schedule B2).

The ASC NEPM recommends the use of a systematic planning process to define the objectives of the site assessment and developing a plan for the collection and evaluation of representative data to achieve the defined objectives.

Without systematic planning, the site assessment may be ambiguous or inconclusive, which may lead to additional sampling requirements, resulting in increased costs and project delays (ASC NEPM, Schedule B2).

The following sections provide details on the information and minimum standard of assessment that the EPA expects to be undertaken for sites containing, or potentially containing, USS.

2.2 Preliminary site investigation

Preliminary site investigations (PSIs) usually include a desktop and field study to collect basic site information and identify the site characteristics (site location, land use, site layout, building construction, geological and hydrogeological setting, historical land uses and activities at the site), as well as identifying potential sources and pathways of contamination.

The PSI report should include an initial conceptual site model (CSM) (see section 2.3), which should clearly identify any significant data gaps. This will assist in developing the required targeted site assessment works to address these data gaps.

Assessments of USS sites typically assume that the main chemicals of concern are those associated with petroleum hydrocarbon products. This approach does not consider other contaminants associated with:

- products that may have previously been stored in the USS or former USS
- drum cleaning and filling, eg pesticides, oil, grease, fuel, herbicides and solvents
- mechanical repairs, including parts cleaning, spray booths, body shop, tyre shop and brake machining
- waste oil and coolant usage and storage
- importation of contaminated fill
- operation of oil/water separation systems and car wash
- surrounding land uses, including underground pipelines
- fuel sources for previous boilers, etc – may include coal or fuel oil
- waste disposal practices.

Schedule B2 of the ASC NEPM describes the recommended information to be included in a PSI. Information particularly relevant to USS sites are:

- identification and location of all present and former tanks (site layout changes), lines, dispensers and filling points, workshops and waste disposal locations
- identification of systems on adjacent land, and kerbside tanks and pumps
- tank and pipeline history, such as method of construction, age of tanks, details of cathodic protection and maintenance, and records of any product or waste spills and leaks
- drainage and pollution control system diagrams which can include triple interceptor traps, blind sumps and oil/water separators
- information on service trenches and infrastructure on and adjacent to the site, such as stormwater, sewer, gas, telecommunications and electrical easements which could represent pathways for contaminant migration
- current and historical as-built diagrams of the site
- concrete patchwork or newly filled areas that may indicate previous tanks and/or equipment having been removed or replaced, or new tank locations
- historical aerial photographs and/or council searches to indicate changes and modifications
- records of previous incidents and equipment modifications
- details of any previous tank and line integrity testing
- details of any USS gauging at the site, including stock reconciliation records (manual or statistical inventory reconciliation analysis if available), maintenance schedules and previous investigations
- dangerous goods records
- location of all above and underground structures and services to assist in planning detailed site investigation (DSI) sampling locations
- potential areas subject to filling with imported fill of unknown origin.

In most instances a PSI is not a sufficient assessment of site contamination at sites containing USS, with DSIs required to characterise the nature and extent of site contamination.

During site inspections it is important to verify the site layout, including the location of USS infrastructure, to determine any differences between historical and current site plans, and identify any potential changes between plans and observed site conditions. The current site layout may be different to the original layout, and there may be additional areas of potential contamination that require further investigation in the DSI stage.

2.3 Conceptual site model

Part 3 of the *Guidelines for the assessment and remediation of site contamination* (EPA 2018) and Schedule B2 of the ASC NEPM describes the fundamentals of developing a conceptual site model (CSM) and required information.

The CSM is fundamental part of all site assessments, and provides the framework for identifying how the site became contaminated, and how potential receptors may be exposed to contamination either in the present or the future (ASC NEPM 2013). A preliminary CSM should be developed from the findings of the PSI, with the CSM to identify the relevant source–pathway–receptor linkages and identify data gaps.

The essential elements of an initial CSM are:

- known and potential sources of contamination and contaminants of concern including the mechanism(s) of contamination (eg 'top down' spill or subsurface release from corroded tank or pipe)
- potentially affected media such as soil, sediment, groundwater, surface water, soil vapour, indoor and ambient air

- human and ecological receptors
- potential and complete exposure pathways.

The CSM should be presented in written format and illustrated with suitable graphics and flow diagrams.

The development of a CSM is a dynamic process and it is important that all the information and data from each stage of an assessment are reviewed in an integrated manner (using a multiple-lines-of-evidence approach where appropriate) to refine the CSM and used to inform subsequent decisions on whether further investigation or management is necessary (ASC NEPM 2013). The data gaps identified should be used to inform the required further assessment in the DSI stage.

2.4 Chemicals (substances) of interest

The main chemicals (substances) of interest (COI) should be determined in the PSI and will vary depending on the potentially contaminating activity (PCA) undertaken at the site and the use of the USS. The main COI that may be associated with USS include, but are not limited to:

- petroleum fuels, lubricating oil and additives such as organometallic compounds, surfactants, biocides, molybdenum compounds and corrosion inhibitors, eg ethanol, lead, methyl tertiary butyl ether (MTBE), methyl ethyl ketone (MEK), di-isopropyl ether (DIPE), ethanol, trimethylbenzene (TMB), polycyclic aromatic hydrocarbons (PAHs) and phenols
- chemicals associated with chemical or fuel manufacturing
- metals naturally occurring in the product being refined, including nickel, vanadium, copper, zinc and mercury
- catalysts and solvents that may have been used in the manufacturing process, such as vanadium, cobalt, molybdenum and platinum
- degreaser and solvents such as chlorinated hydrocarbons
- waste oil (highly variable composition)
- other chemicals including ammonia, copper chrome arsenate (CCA), acids, caustics, coal tar distillates, paint, poison and chrome
- Per- and poly-fluoroalkyl substances (PFAS) associated with firefighting equipment (including training) or fire suppression systems.

2.5 Detailed site investigation

The PSI should provide sufficient information to design a detailed site investigation (DSI) that considers the preliminary CSM developed at the PSI stage, with intrusive site assessment works to support the refinement of the CSM to establish the potential source–pathway–receptor linkages using a multiple-lines-of-evidence approach. In some instances, it may be appropriate to complete the PSI and DSI stages as a single phase of assessment work.

The DSI stage should identify the nature of the site contamination and delineate its lateral and vertical extent to a sufficient degree that an appropriate level of risk assessment may be undertaken and, if necessary, provide the basis for the development of an appropriate remediation or management strategy (section 2.2 of Schedule B2 of the ASC NEPM).

Methods used at the DSI stage can include intrusive soil, groundwater, surface water and vapour assessments on and off the site, as determined by the data quality objectives (DQOs), and a sampling and analysis quality plan (SAQP) developed for the assessment. The development of the DQOs and SAQP should be guided by the identification of critical data gaps in the CSM. The DQO and SAQP process is outlined in section 5 and Appendix B of Schedule B2 of the ASC NEPM should be prepared for all DSI programs prior to the commencement of sampling activities.

Appropriate approvals should be sought prior to undertaking any intrusive assessment on public or private land. This may include permits for monitoring well installation, permission from the local council and informed consent from private land-owners⁶.

The DSI process may be completed in a staged process, including a number of field events, to support the continual refinement of the CSM by assessing and testing data gaps and uncertainties identified in the CSM at the completion of each DSI stage.

Consultants, auditors, land-owners and occupiers should have regard to the mandatory reporting requirements to the EPA pursuant to the EP Act, EPPs and relevant EPA guidelines when undertaking any assessment. Further details in regards to mandatory notification requirements can be found in the *Guidelines for the assessment and remediation of site contamination* (EPA 2018).

2.6 Data quality objectives and sampling and analysis quality plan

The establishment of DQOs and SAQP is necessary to ensure that the data collected is representative and reliable risk-based decisions can be reached as part of site assessment. The DQO process has seven steps to define the objectives, type, quantity and quality of information required for site assessment to inform the development of the SAQP.

To meet the objectives of a SAQP, refer to section 5.3 of Schedule B2 of the ASC NEPM. A SAQP should be prepared ahead of site assessment in consultation with relevant stakeholders, field staff and laboratory personnel.

SAQPs should also outline establishment of DQOs including:

- objectives/purpose of site assessment
- summary of the CSM (visual representation) including critical gaps
- a data gap analysis of existing data for inclusion/exclusion
- the appropriate environmental values and investigation levels and criteria to be adopted for the assessments including justification and limitations of criteria⁷
- media to be sampled and analysed ('where, how, what and when' approach)
- adequate quality assurance and quality control (QA/QC) processes to ensure that data collected will be reliable (field and laboratory data quality assessment)
- occupational health and safety requirements
- contingencies
- reporting and interpreting outcomes including any limitations or remaining data gaps.

Information on sampling design and QA/QC in the field and laboratory are described in the ASC NEPM schedules B2 and B3, respectively.

When designing a SAQP, potential safety and environmental hazards at the sampling site must be considered and mitigated. For instance, installing groundwater wells in roadways or adjacent to buried infrastructure may have health, safety, security and environmental risks which must be addressed. The plan should also include contingencies for encountering unexpected finds.

2.7 Soil assessment

Soil investigation programs for sites containing USS should delineate the nature and extent (lateral and vertical) of site contamination of soil, and arrive at a scientifically defensible and statistically valid data set that characterises chemical

⁶ Refer to section 12.3, *Guidelines for the assessment and remediation of site contamination* (EPA 2018)

⁷ Refer to section 3.5, *Guidelines for the assessment and remediation of site contamination* (EPA 2018)

concentrations in the soil. Investigation should target the locations of USS infrastructure (tanks, lines, fill points, dispensers and pits), site utilities and other potential contaminating activities undertaken at the site as identified in the PSI.

The consultant should be aware that unidentified infrastructure (such as old tanks and lines or unmarked drainage and service trenches) may exist at the site and ensure this is covered by a more generalised sampling strategy so that the nature and extent of site contamination is fully characterised. Where other potential sources of contamination, such as fill of unknown origin, workshop areas, above-ground storage tanks (AST) and waste oil tanks are identified, additional targeted sampling may be required once their locations have been established.

The selection of the investigation strategy and sample locations should be based on the information collected in the PSI stage and the preliminary CSM. The adopted sampling design and methodologies used should be fully documented and justified by the consultant, consistent with the section 6 of Schedule B2 of the ASC NEPM. Where sufficient information has been collected for the site in the PSI and the location of all current or former USS or associated infrastructure are known, a judgemental sampling design may be appropriate. Where the PSI is unable to reliably identify the locations of the USS infrastructure, systematic and grid-based sampling should be undertaken. The site's preliminary CSM should guide identification of any areas of concern, number of samples, COIs and sampling protocols to be used.

Based on the selected investigation strategy, design and methodology, appropriate sampling and QA/QC procedures should be clearly documented in the SAQP. Sections 5.4 and 7 of Schedule B2 of the ASC NEPM provides further details in relation to QA/QC procedures and investigation techniques respectively.

Due to the uncertainty about the precise locations of underground infrastructure, an accurate site layout plan must be obtained and a 'dial before you dig' check must be completed to provide information on underground services. A survey by a professional service locator must be completed to confirm the location of infrastructure. Data obtained during these activities may assist to further refine the CSM.

It is important to obtain soil samples from below the base depth of any known or suspected USS or associated infrastructure. Where identified, potentially contaminated areas, including contaminant source locations, should be sampled and analysed for all relevant COIs (see section 2.4 of this guideline).

As a minimum, field screening of all soil samples for volatile organic compounds (VOCs) should be undertaken using a photo-ionisation detector (PID) to gather information on the presence of contamination to inform further investigations and aid selection of samples for laboratory analyses. This should be supplemented by observations during fieldwork, including the visual appearance of samples (such as colour or staining) and olfactory indicators of contamination (odour). Data from the field screening techniques are only qualitative indicators of contaminant concentrations and must be supported by laboratory data. Different methods and technologies are available and site characteristics will dictate which is suitable. A number of more advanced field screening tools are available to identify areas or strata of interest. These include membrane interface probes (MIPs), laser-induced fluorescence (LIF) and soil vapour surveys. Further details can be found in Schedule B2 of the ASC NEPM and [CRC CARE Technical Report 11 – Characterisation of sites impacted by petroleum hydrocarbons](#) (2009).

The consultant should ensure that accurate and detailed lithological logs are developed for each soil sampling location, which include the field screening and observation results. Further details in regards to the information to be included in soil assessment logs can be found in section 7 of Schedule B2 of the ASC NEPM.

The consultant should keep calibration gas certificates (where applicable), instrument maintenance records and calibration records for all field screening equipment used in an investigation. As a minimum calibration records on each day of the soil investigation should be recorded and presented within the DSI report.

Table 1 summarises the minimum recommended protocols for soil sampling at potential locations of concern at USS sites. The list is not exhaustive and the applicability of these protocols should be based on the CSM for each site, the stage of investigation (including field screening) or validation and access and safety constraints. The protocols should be considered a minimum requirement for sites being decommissioned or validated.

Table 1 Minimum recommended soil sampling (not including QA\QC)

Potential locations of concern	Assessment (infrastructure remaining)	Validation (infrastructure removal)	Comment
USS	Minimum of four sample locations as close as possible to each side and end of the USS down to a minimum depth of 3 m. Borehole locations and depths should be guided by olfactory/visual/field indicators (PID).	Minimum of five samples per UST at or below the base of the tank or where UST corrosion is observed and each wall of the UST pit. Samples should be collected at the approximate depth of the base of the tank. Collect and analyse any ingress water and or residual emulsion.	If assessing a tank farm then it is acceptable to have boundary assessment bores rather than four sample locations per UST. If resulting UST excavation is large (>25 m ² per wall or base) then collect one extra wall and base sample per 25 m ² increase.
AST including triple interceptor or grease traps (parts washing) and chemical storage	Minimum of two sample locations up to 1 m depth beneath the AST guided by olfactory/visual/field indicators (PID). If concrete bund is present then sample where overflow/crack evident or nearest downgradient position.	Two samples analysed from beneath each AST at depths of 0.1–0.2 m and 1 m.	Sample any spill or stain areas. Observe any bund cracks or piping (migration pathways) and sample beneath infrastructure.
Fuel lines	Minimum of one sample location for each fuel line leading to canopy dispensers and from refill locations to USTs. Sample depth of up to 1 m guided by olfactory/visual/field indicators (PID).	Collection of one sample per 5 m fuel lineage. Validated via test pits rather than boreholes.	
Dispensers	One sample location per dispenser at up to 1 m depth guided by olfactory/visual/field indicators (PID). Sample location should be as close as possible to dispenser or downgradient to assess impacts noting depth of bore should be increased to compensate for potential contamination migration.	Two samples analysed from beneath each dispenser at depths of 0.1–0.2 m and 1 m.	

Potential locations of concern	Assessment (infrastructure remaining)	Validation (infrastructure removal)	Comment
Remote fill points	Minimum of one sample per refill point area down to 1 m depth. Position as close as possible in a downgradient position (where known).	Minimum of one sample per refill point or as otherwise dictated by olfactory/visual/field indicators (PID).	
Workshop (hoists, compressors, etc)	Inspect the surface area for cracking and detail the migration pathways of potential waste disposal. Depending on the outcome, target the locations of the hoists, compressors, sumps or other workshop activities. Minimum of four targeted sample locations for a workshop should be undertaken.	As per assessment, with a minimum of four targeted locations undertaken in the workshop area.	
Stockpiles	In accordance with the ASC NEPM (Schedule B2, section 7.5).	In accordance with the ASC NEPM (Schedule B2, section 7.5).	Applying statistical analysis to lower sampling rates can only be used for similar material types (cannot use fill and natural to reduce sampling rates).

Whether this or an alternative protocol is adopted, the protocol used must be justified in the SAQP. For instance, alternatives based on site history or other evidence (eg visual or olfactory observations of contamination in the field) may lead to a changed sampling strategy. Samples must be collected in accordance with the EPA guidelines, Australian Standards and Schedule B2 of the ASC NEPM.

2.8 Groundwater monitoring and assessment

The assessment of site contamination in groundwater at sites containing USS can be complex. Generally comprehensive groundwater assessments are completed in a staged approach to fully characterise the nature and extent (laterally and vertically) of site contamination. The groundwater assessment program should be based on the findings of the PSI, soil assessment and robust CSM. Details in regards to the minimum requirements for the design and application of detailed groundwater assessments can be found in the *Guideline for the assessment of background concentrations* (EPA 2018), and Schedules B2 and B6 of the ASC NEPM.

For sites containing USS the EPA considers that initial groundwater investigations should target known or suspected source areas (ie USS), with subsequent investigations undertaken to delineate the lateral and vertical extent of the site contamination (if identified). Groundwater investigations may need to extend off-site to fully characterise the nature and extent of the plume and to establish background groundwater quality values. Any off-site investigations should not be undertaken until approval from the relevant authority and/or property owner(s) has been granted. Where consultants deviate from this approach, the alternate approach must be justified in the SAQP.

When developing the DQOs and SAQP for the groundwater assessment the potential for off-site sources of site contamination should be considered in the CSM, depending on the surrounding PCAs identified in the PSI. Sites containing USS may be situated in areas surrounded by other commercial/industrial land uses that may also be sources of groundwater contamination.

2.8.1 Groundwater monitoring well installation

The location and design of the groundwater monitoring wells should be based on the CSM and designed to assess the nature and extent of any contamination and determine the direction and speed of groundwater flow. The CSM should guide the required location and number of wells, screen intervals and depths. Consideration should be given to the hydrogeological conditions beneath the site including the presence of more than one watering bearing unit. To minimise the potential for vertical flow between aquifers via the well, the monitoring well screen should not be installed across different geological units, water-bearing zones or aquitards and aquicludes.

Guidance on the appropriate methods for the installation of groundwater monitoring wells, including screen depth and length selection, can found in the EPA publication [Guideline for regulatory monitoring and testing – Groundwater sampling](#) (2019) and in section 8 of Schedule B2 of the ASC NEPM.

All monitoring wells should be installed by an appropriately licenced driller to ensure monitoring wells are in accordance with the [Natural Resource Management Act 2004, Minimum construction requirements for water bores in Australia](#) (National Water Commission 2012) and any other relevant specifications or guidelines.

A staged comprehensive groundwater investigation should ensure sufficient monitoring wells have been installed to assess upgradient groundwater conditions, define the nature and extent of the source area(s) and define the lateral and vertical extent of the contaminant plume in each aquifer on and off-site. A minimum of three monitoring wells per aquifer should be installed to assess groundwater flow direction, velocity and background chemical concentrations.

The initial groundwater assessments should be:

- Close to each potential source of contamination.
- Similar in installation and construction methodologies to minimise potential variation and uncertainty in collected data.
- Screened across the upper aquifer to assess for the presence of any light non-aqueous phase liquids (LNAPLs) and/or screen across the relevant hydrogeological unit to assess for presence of any dense non-aqueous phase liquids (DNAPLs). At sites where groundwater levels may fluctuate over time (ie seasonal or tidal influences), screen lengths should be designed to take this into consideration.

Table 2 details recommended protocol for the initial groundwater assessment at a site containing USS. The number and location of monitoring wells should be guided by the CSM and detailed in the SAQP. Whether this or an alternative protocol is adopted, the protocol used must be justified in the SAQP. For instance, alternatives based on site history or other evidence (eg soil or vapour assessment results) may lead to a change in assessment strategy.

Table 2 Recommended groundwater monitoring well locations

Well location	Indicative number of groundwater well locations	Comment
Adjacent to and down hydraulic gradient of any potential USS contamination source(s)	Minimum of one well per potential contamination source area, subject to size and proximity of areas (ie additional monitoring wells may be required).	Focus of monitoring wells to assess potential source zone(s). Monitoring wells need to target the part, or parts, of the aquifer most likely to be affected by contamination. Depending on COI and underlying hydrogeological conditions, deeper wells may need to be installed to assess for DNAPL.
Down hydraulic gradient of potential contamination source(s), site perimeter and off-site	A number of monitoring wells may be required to determine lateral extent of plume on-site. The number of on-site, perimeter and off-site downgradient wells will be dependent on the lateral extent of contamination and sensitive receptors requiring protection.	Focus of monitoring wells is to determine the lateral extent of the contamination and determine potential pathways to sensitive receptors. Sufficient monitoring wells should be installed to allow an accurate assessment of groundwater flow direction and velocity.
Upgradient monitoring well to establish background groundwater quality	Minimum of one groundwater monitoring well should be installed at a suitable location to assess background groundwater quality.	See the EPA publication, <i>Guideline Assessment of background concentrations</i> (2018) for further information.

2.8.2 Groundwater sampling

Groundwater sampling methodology and analytical schedule should be defined by the CSM, and designed to meet the developed DQOs. The selection and application of appropriate groundwater sampling methodologies are detailed in *Guideline for regulatory monitoring and testing – Groundwater sampling* (EPA 2019) and section 8.2.4 of Schedule B2 of the ASC NEPM. The selection of groundwater sampling techniques should be based on a number of considerations including, but not limited to, the hydrogeological conditions, COI to be sampled and monitoring well design. To reduce uncertainty within the groundwater analytical data set, groundwater monitoring wells should be sampled using consistent methodologies. Generally, the same methods should be used each time the wells are sampled to avoid introducing sampling method-related uncertainties to the analytical data. Where an improved technique becomes available, it is recommended that it is trialled in combination with the existing sampling method to establish the nature and magnitude of any changes in analytical results as a result of the new sampling method.

All monitoring wells should be gauged for the presence of NAPL prior to sampling. All gauging data utilised for developing relative levels to determine the direction of groundwater flow should be corrected to account for the presence of NAPL and salinity of the groundwater.

Prior to sampling the consultant should ensure that a representative sample of groundwater is collected. Where the sample is being collected to assess the dissolved phase concentration of a COI, the EPA does not consider it appropriate that wells containing NAPL (measurable thickness or a sheen) be sampled for this purpose. The sampling of NAPL can be undertaken to assess the composition of the NAPL and/or to complete specialised analysis (such as fingerprinting).

Where a measurable thickness of LNAPL has been identified, bail down testing should be undertaken to provide information on the potential mobility and recoverability of the LNAPL in the immediate surroundings of the monitoring

well. Further information in regards to the assessment of LNAPL fluid properties and mobility/recovering testing can be obtained from the following documents:

- [CRC CARE Technical Report 11 – Characterisation of sites impacted by petroleum hydrocarbons](#) (2009)
- [CRC CARE Technical Report 34 – A practitioner’s guide for the analysis, management and remediation of LNAPL](#) (2015)
- [ASTM Standard Guide for Estimation of LNAPL Transmissivity](#) (2013)
- [API LNAPL Transmissivity Workbook – A Tool for baildown test analysis](#) (2016).

Where natural attenuation of a COI may be occurring, appropriate field hydro-geochemical parameters (pH, redox, electrical conductivity, dissolved oxygen and temperature) should be collected, with key samples analysed for biodegradation parameters (nitrate, ferrous iron, manganese, sulphate, dissolved methane and alkalinity) and relevant breakdown products (these will depend on the COI).

Further details in regards to the minimum requirements of a natural attenuation assessment for petroleum hydrocarbons can be found in [CRC CARE Technical Report 15 – A technical guide for demonstrating monitored natural attenuation of petroleum hydrocarbons in groundwater](#) (2010).

2.9 Vapour assessment

The need for a vapour assessment should be informed by a well-developed and robust CSM. For a vapour intrusion (VI) pathway to be complete there must be a source of subsurface vapours (soil and/or groundwater), a receptor such as occupied buildings or the potential for occupied buildings, and a migration route to the receptor (ie subsurface or utilities). Where the CSM considers an unlikely VI pathway, the DSI report should provide multiple lines of evidence to demonstrate the absence of this pathway and why no vapour assessment is required.

A framework and relevant considerations for vapour assessment are detailed in section 9 of Schedule B2 of the ASC NEPM. In addition, the EPA considers the following documents to provide further details for the vapour assessment process:

- [CRC CARE Technical Report 23 – Petroleum hydrocarbon vapour intrusion assessment: Australian guidance](#) (2013)
- [OSWER Technical Guide for Assessing and Mitigating the Vapour Intrusion Pathway From Subsurface Vapour Sources to Indoor Air](#) (US EPA 2015)

The CSM should inform the consultant of the current or potential VI pathways and what vapour assessment is required to assess the vapour risk. The developed DQOs and subsequent SAQP should details the specifics of the vapour assessment, including the COI, sampling methods, locations, depth (soil vapour), number and frequency of sampling events.

2.10 Risk assessment

Based on the findings of the DSI an assessment of the risk posed to human health and the environment may be required. The need or value of a risk assessment will be informed by the outcome of the DSI process and resulting CSM. Details relating to when a site-specific human and/or ecological risk assessment is required, the tiered risk assessment approach and a framework on how to undertake a risk assessment are provided in the *Guidelines for the assessment and remediation of site contamination* (EPA 2018) and the ASC NEPM.

3 Remediation

Remediation of sites containing USS should be undertaken in accordance with Part 4 of the *Guidelines for the assessment and remediation of site contamination* (EPA 2018). In circumstances where the USS or associated infrastructure are being upgraded (ie re-tanking) as part of maintenance and development works, the EPA expects that an appropriate assessment is completed, and a site remediation plan (SRP) and remediation validation report (RVP) are completed, if necessary.

DRAFT

4 Reporting

The EPA recommends that the following reporting process be completed during the standard assessment and remediation process:

- preliminary site investigation (PSI)
- sampling analysis and quality plan (SAQP)
- detailed site investigation (DSI)
- site-specific risk assessment (SSRA)
- remediation options assessment (ROA)
- site remediation plan (SRP)
- remediation validation report (RVP)
- site management plan(s) (SMP), if required.

Depending on the findings of the assessment, selected reporting stages may not be required.

All reporting provided to the EPA must be undertaken in accordance with the *Guidelines for the assessment and remediation of site contamination* (EPA 2018), ASC NEPM (2013) and this guideline.