

## SITE CONTAMINATION POLICY – SUMMARY OF CHANGES

**Red text** – new text

~~Strikethrough~~ – text removed

... – part of a sentence or paragraph that was amended

General updates to:

- Corporate branding/template
- Corporate writing style (e.g. COA changed to CoA)
- Grammar and tense
- Formatting and graphics
- Reflect changes to legislation e.g. *Development Act 1993* has been updated to *Planning, Development and Infrastructure Act 2016* etc.

| PAGE           | SECTION | NEW   | RATIONALE FOR CHANGE   |
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| <b>PURPOSE</b> |         |   |  |
| 1              | -       | The Policy <del>will also clarify</del> <b>ies</b> the role of <b>the</b> City of Adelaide...   | Tense change for readability   |
| 1              | -       | Removal of reference to Operating Guidelines, tense change and formatting (dot points)  | Improve readability. The scope of the Operating Guidelines is dealt with in the Operating Guidelines and doesn't need to be included in this section of the Policy.  |
| 1              | -       | <p>...will assist the City of Adelaide, <del>private landowners, developers and the general community</del> in understanding legislative and regulatory obligations relating to site contamination. <b>Additionally, relevant national and state guidance will be referenced where appropriate to ensure comprehensive understanding and compliance.</b></p> <p>...</p> <p><b>South Australian Environment Protection Authority (EPA) has its own guidance to assist private landowners, developers and the general community in managing site contamination.</b></p> | <p>Feedback from EPA that they have their own guidance to assist landowners, developers, general community and suggested that Policy be limited to CoA. EPA suggested referencing appropriate national and state guidance.</p> |



| PAGE             | SECTION                 | NEW  | RATIONALE FOR CHANGE   |
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| 1                | <b>Scope</b>            | <p>The Policy provides a framework to mitigate, remediate or manage site contamination (as defined in Section 5B of the Environment Protection Act 1993 (the EP Act) (SA)) that poses a risk to human health and the health of natural environmental systems on property that is:</p> <ul style="list-style-type: none"> <li>Owned by CoA - where CoA owns, occupies and manages land, including land where CoA is the landlord <b>and land managed by Council subsidiaries as Body Corporates.</b></li> </ul>   | Clarifies that subsidiaries such as ACMA are covered by the Policy.          |
| <b>STATEMENT</b> |                         |  |  |
| 2                | <b>Policy Objective</b> | Heading “Policy Statement” moved to left column.   | To reflect the new template format.  |
| 2                | <b>Policy Objective</b> | “...provides guiding principles and procedures...” changed to “The Policy <b>sets objectives and requirements</b> to assist CoA...”  | In line with the policy statement rather than operating guidelines           |
| 2                | <b>Policy Objective</b> | <ul style="list-style-type: none"> <li>To protect public health and the natural environment from <del>the legacy of land subject to potentially contaminating activities or actual known site contamination or potentially contaminating activities.</del></li> <li>To prevent <del>actual or additional</del> contamination occurring on public or private land or in groundwater or water bodies <del>within</del> the CoA local government area.</li> <li>To enable CoA to fulfil its responsibilities <b>regarding the consideration of applications for rezoning, development,</b> <del>relating to the consideration of applications for rezoning, development and building activities.</del></li> <li>To ensure due diligence is undertaken <b>regarding the presence or potential presence of site contamination in relation to any development of land involving the CoA and land to be acquired, vested in, or placed under the care, control, and management of the CoA</b> <del>in relation to any development of land involving the CoA, and land to be acquired, vested in, or placed under the care, control and management of the CoA, in relation to the presence or potential presence of site contamination at the land.</del></li> </ul> | Improve readability, tense changes, providing clarity and feedback from EPA. |

| PAGE | SECTION   | NEW  | RATIONALE FOR CHANGE   |
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| 2    | <b>Legislative Requirements</b>                               | General environmental duty (GED) under section 25 of the EP Act requires that s a person takes all reasonable and practicable measures to prevent or minimise environmental harm.  | Noting additional legislative requirement.   |
| 2-3  | <b>Legislative Requirements</b>                               | CoA will comply with its obligations under the <i>Planning, Development and Infrastructure Act 2016</i> when: <ul style="list-style-type: none"> <li>• Developing land; or</li> <li>• Changing land use.</li> </ul>  | Additional text to reflect the changes to the legislation  |
| 3    | <b>Prevention</b>   | Heading change: <del>Site Contamination</del> Prevention   | Contamination can relate to a 'site' or groundwater etc. therefore prevention is better suited as a heading. |
| 3    | <b>Prevention</b>   | In accordance with s25 of the EP Act CoA will implement procedures and practices to <del>limit</del> prevent or minimise the actual contamination of land or water or environmental harm as a consequence of from works undertaken by CoA staff and its contractors. | Linking to GED and environmental hard, and clarity.  |
| 3    | <b>Management and Remediation</b>                             | Heading change: Management and Remediation of Contaminated Land  | Contamination can related to groundwater as well as land, title change reflects this.                        |
| 3    | <b>Management and Remediation</b>                             | CoA commits to implementing practices to manage or <del>eliminate</del> remediate (as defined by EP Act) risks...  | Eliminate isn't a defined term under the EP Act but remediate is.  |
| 3    | <b>Purchase, Transfer and Divestment of Ownership of Land</b> | ...(in accordance to s103c, s203D and s103E of the EP Act)...  | Feedback from EPA to include reference to the Environment Protection Act.                                    |
| 4    | <b>Environmental Site History Register</b>                    | CoA will manage the collection, use, storage and disclosure of any known information relating to site contamination on public and private land and historical land uses in accordance with the CoA Privacy Policy.<br>...  | Clarification and reiteration of record keeping requirements under legislation.                              |

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|      |                                   | Records related to site history will be maintained in accordance with the <i>State Record Act 1997</i> (SA), ensuring their preservation for the necessary duration to meet legal and operational requirements.  |   |
| 4    | <b>Risk Management</b>            | CoA is committed to environmentally responsible practices within the Adelaide Park Lands. <del>The Council</del> CoA prioritises the removal of contamination for management and remediation at to an appropriate and legal offsite waste disposal location and the avoidance of capping/landscaping of contamination within the Adelaide Park Lands where practicable. <del>This aligns with the Council's strategic goal of "a City where nature thrives".</del>   | Reflect current practices   |
| 5-6  | <b>Roles and Responsibilities</b> | <del>The Chief Executive Officer has ultimate responsibility for site management across the local government area in accordance with the Policy.</del><br>The Director, City Shaping has responsibility for reviewing the Policy.<br>The Director, City Services has responsibility for the development of appropriate management practices, ownership of the Environmental Site History Register and a proactive culture to manage site contamination across the CoA.   | Provide further clarifications for staff on responsibilities as there hasn't been clarify for several years |
| 6    | <b>Roles and Responsibilities</b> | <del>Associate Directors and the Chief Operating Officer are CoA is responsible for:</del><br><ul style="list-style-type: none"> <li>Implementing the Policy and Operating Guidelines.</li> <li>Managing land owned by CoA in accordance with legislative requirements regarding site contamination.</li> <li>Protecting the health and safety of its employees, contractors and the community at sites where contamination exists, as far as is reasonably practicable.</li> <li>Prudent and diligent land-use planning across the CoA....</li> </ul> | Provide further clarifications for staff on responsibilities as there hasn't been clarify for several years |
| 6    | <b>Roles and Responsibilities</b> | The Infrastructure and Public Works Committee is responsible for considering matters relating to site contamination on CoA-owned land.   | Provide further clarifications for staff on responsibilities as there hasn't been clarify for several years |

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|      |  | <p>Relevant members of the Administration are responsible for keeping the Environmental Site History Register current and record keeping of associated documentation.</p> <p>Relevant members of the Administration need to be alert to the detection of actual or potential contamination issues prior to any work or activity commencing on any land owned, occupied or managed by CoA.</p>   |   |
| 6    | <b>Roles and Responsibilities</b>        | <p>The role of the EPA is to:</p> <ul style="list-style-type: none"> <li>...Develop Environment Protection Policies and associated Codes of Practice or Standards....</li> <li>Ensure that investigations are consistent with the risk-based <i>National Environment Protection (Assessment of Site Contamination) Measures 1999</i> (NEPM).</li> </ul>   | EPA provided additional dot points that relate to their roles in context of CoA policy.   |
| 7    | <b>Roles and Responsibilities</b>        | <p>The role of the State Planning Commission (the Commission) is to:</p> <ul style="list-style-type: none"> <li>Safeguard community health by providing a consistent state-wide planning approach to site contamination assessment.</li> <li>Specify site contamination assessment steps that must be taken when a change to more sensitive land use is proposed (including an application for land division)</li> </ul>  | Addition relating to change to legislation since previous policy was adopted.   |
| 7    | <b>Policy Restrictions / Limitations</b> | <p><del>"The Policy and Operating Guidelines..."</del><br/> <del>"...this Policy or Operating Guidelines."</del></p>  | Irrelevant to refer to Operating Guidelines   |
| 7    | <b>Monitoring and Implementation</b>     | <p>The Associate Director, <del>Park Lands, Policy and Sustainability Program</del> <b>is responsible for the review of the effectiveness and currency of the Policy as stated the Administrative Section below Section 7 above</b>, and will report on the outcome of the <del>evaluation</del> <b>review</b> and make recommendations for amendment, alteration or substitution of a new Policy as necessary.</p> <p>The Associate Director, Infrastructure; Associate Director, City Operations and Chief Operating Officer are responsible for the implementation and embedding of the Policy into standard work practice within relevant programs and will report on the outcome and</p> | <p>Update to reflect organisational structure and role changes since policy adoption</p> <p>Changes to template / formatting.</p> <p>Further clarification in relation to responsibilities and changes to the organisational structure since the previous policy was adopted.</p> |

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|                               |                             | make recommendations for amendment, alteration or substitution of standard work practices as necessary.  |   |
| 7                             | <b>Measures of Success</b>  | <ul style="list-style-type: none"> <li>...The <b>Policy is supported by</b> Operating Guidelines <b>that</b> are adopted into standard work practices within relevant programs across CoA....</li> </ul> | Readability   |
| <b>OTHER USEFUL DOCUMENTS</b> |                             |  |   |
| 7 - 8                         | <b>Related documents</b>    | Updated list of related documents  | Reflect changes in internal documents since previous policy was adopted |
| 7 - 8                         | <b>Relevant legislation</b> | Updated list of relevant legislation   | Reflect changes in legislation since previous policy was adopted        |
| <b>GLOSSARY</b>               |                             |  |   |
| 8 - 9                         | -                           | The Commission: the State Planning commission  | Reflect changes to legislation  |
| 8 - 9                         | -                           | <b>Operating Guidelines:</b> Site Contamination Operating Guidelines as approved by <del>COA Executive Leadership Team</del> <b>the City of Adelaide's Chief Executive Officer.</b>                      | Using generic terms in public facing documents.                         |
| <b>ADMINISTRATIVE</b>         |                             |  |   |
| 9                             | -                           | <b>The next review is required in September 2029</b>   | Updated review date.  |
| 9                             | <b>Review History</b>       | Tabled updated to reflect versions and Trim References   | Ensure revision history is up to date.                                  |
| 9                             | <b>Contact</b>              | ...the Park Lands & <b>Policy and</b> Sustainability Program   | Update to reflect changes to organisational structure and title changes |



## SITE CONTAMINATION OPERATING GUIDELINES – SUMMARY OF CHANGES

**Red text** – new text

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... – part of a sentence or paragraph that was amended

General updates to:

- Corporate branding / template
- Corporate writing style (e.g. COA changed to CoA)
- Grammar and tense
- Formatting and graphics
- Reference of internal software / programs used e.g. record management and spatial tools
- Reflect changes to legislation e.g. *Development Act 1993* has been updated to *Planning, Development and Infrastructure Act 2016* etc.

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| <b>PURPOSE</b> |         |  |  |
| 1              | -       | <p><del>The Site Contamination Operating Guideline assists COA staff to ensure the Site Contamination Policy is enacted and that legislative obligations are followed.</del></p> <p><del>It provides a clear framework for identifying potentially contaminated sites, determining the level and requirements for site assessment, remediation or auditing and establishes decision processes relevant to the types of work or activities where site contamination may be a risk factor.</del></p> <p>The purpose of the Site Contamination Operating Guidelines (the Operating Guidelines) is to provide a framework for managing site contamination at the City of Adelaide (CoA) (refer to Site Contamination Management Framework Appendix 1).</p> <p>The Operating Guidelines assist the CoA's Administration in identifying potentially contaminated sites and determining the level</p> | Readability and reflects nature and context of the Operating Guidelines. |



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|                           |   | <p>and requirements for site assessment, remediation or auditing (refer to Site Contamination Legislation Appendix 2).</p> <p>The CoA's approach to managing site contamination seeks to achieve the general environmental duty by ensuring that all reasonable and practicable measures are taken to prevent or minimise environmental harm and establishes decision processes relevant to the type of work or activities where site contamination may be a risk factor.</p> <p>The Operating Guidelines should be read in conjunction with the Site Contamination Policy</p>  |   |
| <b>SCOPE</b>              |   |   |   |
| 1                         | -   | <p><del>This</del> <b>These</b> Operating Guidelines <b>apply</b> to administrative and operational staff, and contractors of CoA who undertake works, projects, development assessment, and land-use planning on land owned or managed by CoA where contamination is suspected or known to be present within the City of Adelaide.</p> <p>staff changed to employees</p> <p>The Operating Guidelines <del>applies</del> <b>applies</b> to the creation and management of the Environmental Site History Register (<b>ESHR</b>) (formally known as <b>Site Contamination Register</b>), its content, use and access <del>within</del> <b>by</b> the Administration of <del>COA</del>.</p> | Tense changes and acknowledgement of name change to the Environmental Site History Register (ESHR) following legal advice received in 2017. |
| <b>OPERATING GUIDANCE</b> |   |   |   |
| 1-2                       | <b>Identifying Potentially Contaminated Sites</b> | <p>This section provides information for identifying potentially contaminated sites and determining the level and requirements for site assessment, remediation or auditing.</p> <p><b>IDENTIFYING POTENTIALLY CONTAMINATED SITES</b></p> <p>Site contamination <del>may have</del> <b>has</b> occurred <del>when</del>:</p>  | Provide a summary of the section, added title, rewording of each category and including reference to relevant legislation and regulations.  |

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|      |         | <p><b>Historic</b> - the City of Adelaide has been occupied by a variety of businesses, factories and places of work. Over time, as the city has changed, so too has the type of activities, however, practices once considered appropriate, such as burying wastes and liquids onsite or disposing them into groundwater wells has resulted in harmful chemicals remaining in soil or groundwater. There was also a need to dispose of rubbish and old landfill sites in and around the city still contain objects, material and wastes that leach chemicals and substances into the surrounding soil or groundwater systems. <b>Former potentially contaminating activities (including specific industries and fill importation as identified in Schedule 3 of the Environmental Protection Regulations 2023), industries and land uses including imported or waste fill.</b></p> <p><b>Imported</b> — material brought in and used to construct roads and prepare building sites within the CBD and for landscaping in the Park Lands has also resulted in contaminated soils being deposited throughout the city, as practices at the time did not consider the quality of the soil.</p> <p><b>Emergency</b> - while historic city activities and practices have created a legacy of site contamination, current day poor practices, <b>responses to</b> accidents and emergencies can also cause additional <b>where potentially</b> contamination or land to become contaminated <b>contaminating substances are not contained and remediated.</b></p> <p><b>Land-use change</b> – also causes a site to become contaminated where a more sensitive use is proposed, <b>as defined by the EP Act and is not limited to residential use.</b> The health and environmental standards for residential properties or sites where children play are of a higher order and they must be protected against chemical substances that remain from legacy contamination.</p> <p><b>Locational impact</b> – land that may be affected by site contamination arising from another site in the vicinity.</p> |                      |

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| 2-3  | <b>Sources of Information on site contamination</b> | <p>The CoA maintains an internal <b>Environmental Site History Register (ESHR)</b> as a source of information about Council owned properties and private land within the CoA. It is not an exhaustive or extensive list and should not be used as the only source of site contamination information.</p> <p>Any information collected by CoA employees regarding site contamination must be added to the ESHR. CoA project liaisons should seek key documents from their contacts and lodge them with the ESHR.</p> <p>† The ESHR is a database of:</p> <p>....</p> <ul style="list-style-type: none"> <li>Copies of external reports or relevant contamination information created or held by other authorities or agencies nearby CoA projects, noting site contamination may extend off-site.</li> <li>The ESHR should include a spatial data layer that integrates data from stockpile soil test reports, waste soil classification details and Management Plans.</li> </ul> <p>The ESHR is held in the central records system and can be viewed and edited by CoA employees (Content Manager ACC2023/13106).</p> <p>...</p> <p>The EPA maintains a <b>Public Register</b> that contains certain details of site contamination recorded by the EPA under Section 109 of the <i>Environment Protection Act 1993</i> (SA) (EP Act).</p> <ul style="list-style-type: none"> <li>CoA employees should seek key documents from the <b>Public Register</b> or EPA and lodge them with the ESHR.</li> </ul> <p>Where CoA submits a Voluntary Site Contamination Assessment Proposal (VSCAP) and or a Voluntary Site Remediation Proposal</p> | Rewording, provision of additional information, reference to the record management system, clarification of roles, update of legislation and form references. |

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|      |   | (VSRP) to the EPA, and that proposal is <b>agreed to by the EPA accepted</b> , all reports associated with the agreed proposal will be lodged on the <i>Public Register</i> . <b>Documents may, or may not include, supporting information contained in community engagement plans, sampling analysis and quality plans, and deliverables of a voluntary proposal.</b>   |  |
| 4    | <b>Triggers for site contamination assessment</b> | <p>Refer to the EPA <a href="#">Site Contamination Regulatory Framework</a> for further details; otherwise, it is summarised below. An assessment of site contamination may be triggered when:</p> <ul style="list-style-type: none"> <li><b>Legislative</b> – the EPA may issue a <i>Site Contamination Assessment Order</i> or <i>Site Remediation Order</i> or enforce site contamination provisions within an environmental authorisation, environment improvement program, environmental performance agreement or works approval issues under the EP Act...</li> <li>...Noting that the EPA will usually request assessment or remediation through other regulatory pathways first, such as a non-statutory agreement (i.e., EPA request for a stage of assessment/remediation with agreement by CoA. This is not an agreement that is recorded in the EPA Public Register) or statutory agreement such as voluntary proposal that is a Public Register document. Orders are generally issued if there is non-compliance with other statutory or non-statutory approaches....</li> <li><b>Voluntary</b> – ... <del>Non</del>-Statutory actions can be developed through a voluntary site contamination assessment proposal or voluntary site remediation proposal that is prepared in agreement with the EPA. <b>This agreement is recorded in the EPA Public Register.</b> Orders are generally issued if there is non-compliance with other statutory or non-statutory approaches....</li> <li><b>Development Assessment</b> – ... (refer to EPA Practice Direction 14 – a Class 1 activity that has occurred or is occurring on land within 60 metres)...</li> </ul> | Provision of additional information relating to EPA updated frameworks, legislation and public register. |

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| 4-5  | <b>Site contamination management process</b><br><b>Determining the level and requirements for site assessment, remediation or auditing</b> | <p>There are three levels of action (Assess, Remediate, Audit) each with corresponding documentation to meet legal, environmental and health obligations to ensure there is quality completion of the type of work needed to make decisions and meet statutory obligations at each stage in the site contamination management process. Further detail about each level is provided in Appendix 3.</p> <p><b>Assess...</b></p> <ul style="list-style-type: none"> <li><del>CSM – Conceptual Site Model</del></li> <li>...The development of a CSM – Conceptual Site Model should be included in the PSI (preliminary CSM), the DSI and the SSRA. The ASC NEPM Schedule A provides the recommended general process for assessment of site contamination. The National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPM) Schedule A describes the tiered or staged site assessment process. Tier 1 comprises preliminary site investigation (PSI) and detailed site investigation (DSI). Tier 2 and Tier 3 investigations comprise site-specific risk assessment. For further guidance refer to the <a href="#">Guidelines for the assessment and remediation of site contamination</a> for other notifications that may be triggered (i.e. notifications of site contamination that affects or threatens underground water).</li> <li><b>Remediate:</b> To undertake activities or develop management strategies to make the site suitable for its intended use. This may include onsite treatment, containment or removal of contamination. means treat, contain, remove or manage chemical substances on or below the surface of the site or as to (a) eliminate or prevent actual or potential harm to the health or safety of human beings that is not trivial, taking into account current or proposed land uses; and (b) eliminate or prevent, as far as reasonably practicable – (i) actual or potential</li> </ul> | Reflect updates and changes to EPA processed following legislation and framework changes; and EPA definitions. |

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|      |   | <p>environmental harm that is not trivial, taking into account current or proposed land uses (refer to s3 the EP Act....</p> <ul style="list-style-type: none"> <li><del><b>Audit:</b> To confirm remediation has been successful or that the site is suitable for a more sensitive use.</del> <b>Endpoint:</b> completion of the audit process, including the submission of a site contamination audit report; and the standard assessment and remediation process where there is no longer a risk to human health and/or the environment (non-sensitive land use sites only) including the submission of a report by an appropriately qualified person stating as such.</li> </ul>   |   |
| 5    | <b>Site Engaging contamination experts</b>          | <p><del>Site contamination is a specialist, scientific and experienced field of knowledge. An appropriately experienced and qualified expert should be used to prepare reports and provide advice. This will ensure any work and documents meet the site contamination process and legislative requirements.</del></p> <p>Site contamination consultants are specifically defined in the EP Act as people who assess the existence or nature or extent of site contamination. The EPA has a policy to recognise certification bodies and schemes which certify site contamination practitioners as suitably qualified and experienced professionals. As such, CoA must use appropriately certified and experienced site contamination experts to investigate, remediate, validate, recommend action or confer outcomes, and prepare reports relevant to site contamination issues specific to a particular location and intended use (refer to Appendix 4) Further information provided by the EPA on selecting a site contamination consultant or a certified site contamination practitioner is available.</p> | Reworded to reflect the EP Act definition.              |
| 5-6  | <b>Community information and risk communication</b> | <p><del>The NEMP Schedule B8 is a useful tool for effective community engagement and risk communication in relation to the assessment of site contamination.</del></p> <ul style="list-style-type: none"> <li><del>The underlying principles of Schedule B8 are:</del></li> </ul>  | Amended following feedback of updated process from EPA. |

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|                             |   | <ul style="list-style-type: none"> <li>Site managers should evaluate the need, nature and extent of community engagement for a project at an early stage where detailed investigations identify contamination as having a potential, or perceived potential, to impact any stakeholder.</li> <li>Community interaction must be based on listening and communicating as a two-way process not just the provision of technical information.</li> <li>Engagement is essential where contamination has the potential, or perceived potential, to extend outside the boundaries of the site.</li> </ul> <p>In certain instances, community information and risk communication may be required relating to site contamination (refer to Appendix 5).</p> <p>Further information published by the EPA includes: <a href="#">Industry – Guideline for Community Engagement</a> and <a href="#">Site Contamination: Guidelines for Communication and Engagement</a>.</p> |   |
| <b>OPERATING PROCEDURES</b> |   |   |   |
| 6                           |   | The CoA's approach to managing site contamination seeks to achieve the general environmental duty by ensuring that all reasonable and practicable measures are taken to prevent or minimise environmental harm and establishes decision processes relevant to the type of work or activities where site contamination may be a risk factor  | New leading paragraph to explain the new section.   |
|                             | <b>General Environmental Duty (to not cause site contamination)</b> | New heading   | New heading to clearly define different sections of the operating procedures.                                 |
|                             | <b>Incidents of environmental harm and</b>                          | Emergency site contamination / pollution incident – is an unexpected and uncontained situation that requires assistance from emergency services.  | A new heading will be created to clearly define different sections of the operating procedures, references to |

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|      | <b>identification of site contamination</b> | <ul style="list-style-type: none"> <li>• Call the required emergency service immediately.</li> <li>• Report the incident to the EPA <a href="mailto:epainfo@sa.gov.au">epainfo@sa.gov.au</a> <a href="#">mailto:</a></li> <li>• Complete an Incident Identification and Assessment Form – submit it to CoA Emergency Management Team and email a copy to <a href="mailto:scregister@cityofadelaide.com.au">scregister@cityofadelaide.com.au</a></li> </ul> <p>Refer to Section 5 Notification Requirements of <a href="#">Guidelines for the assessment and remediation of site contamination</a>.</p> <ul style="list-style-type: none"> <li>• Site contamination that affects or threatens underground water must be notified to the EPA using <a href="#">this form</a> or phone (08) 8204 2004 or 1800 623 445</li> <li>• Emergency/Pollution incident – is an unexpected and uncontained situation that requires assistance from emergency services to mitigate or address environmental harm. <ul style="list-style-type: none"> <li>○ Call the required emergency service immediately.</li> <li>○ Report the emergency incident to the EPA on 8204 2004 or online at <a href="http://www.epa.sa.gov.au/">http://www.epa.sa.gov.au/</a> (click on Your EPA and select report emergency incident).</li> </ul> </li> <li>• Hazardous circumstances that pose an imminent risk to human health and the environment, or a chronic risk to human health, should be reported to the EPA. Section 5.2 of <a href="#">Guidelines for the assessment and remediation of site contamination</a> provide examples of hazardous circumstances and recommended notification, timeframes and emergency contact information.,</li> <li>• Complete a CoA Incident Identification and Assessment Form – submit it to CoA Coordinator, Security &amp; Emergency Management and save a copy a copy on Content Manager appropriately named.</li> </ul> | EPA procedures and changes to CoA organisational structure/role responsibilities. |
| 7    | <b>Decision processes relevant</b>          | Previously “Higher risk activities”.   | Heading change to better reflect the information following.                       |



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|      | to the type of work or activities where site contamination may be a risk factor   |  |   |
| 8    | <b>Operational and maintenance works by CoA employees and contractors; CoA infrastructure projects (asset renewal and capital projects)</b> | No heading previously.   | Heading change to better reflect the information following. |
| 8    | <b>General Operational Activities on Adelaide Park lands (non-sensitive use)</b>  | <p>(refer to Appendix 7, Operating Process 1)</p> <ul style="list-style-type: none"> <li>Soil chemistry data from boreholes or test locations <del>within a 50 meter radius of at least two sample points can be used to determine if there is value in obtaining a site specific soil test</del> should be set as per guidance on sampling design as per section 6 of Schedule B2 of the NEPM.</li> <li>Soil sample data and soil chemistry results from more than <b>five (5) 3 years</b> prior must not be used.</li> </ul> | Adjusted criteria as per EPA advice received.               |
| 8    | <b>Major events spaces, playgrounds or community gardens in the Adelaide Park Lands (sensitive use)</b>                                     | <p>(refer to Appendix 7, Operating Process 2)</p> <p>... the design of sampling strategy, and sampling and analysis quality plan (SAQP) is to be undertaken by an appropriately qualified and experienced site contamination consultant. Sampling and analysis can include, but is not limited to:...</p>  | Adjusted criteria as per EPA advice received.               |

| PAGE  | SECTION  | NEW  | RATIONALE FOR CHANGE   |
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| 10    | <b>Excess soil management</b>  | <p>Adelaide Park Lands soils....</p> <ul style="list-style-type: none"> <li>Any existing sampling locations <b>should be in accordance with guidance on sampling design as per section 6 of Schedule B2 of the NEPM</b> <del>are outside a 50 meter radius zone of the work site.</del></li> <li>Any existing soil sample data and soil chemistry results were produced more than <b>five (5)</b> <del>3</del> years ago.</li> </ul> <p>...A copy of the stockpile soil test report must be <b>saved in Content Manager and appropriately named</b> <del>emailed to sregister@cityofadelaide.com.au and</del> added to the ESHR.</p>   | Adjusted criteria as per EPA advice received and to match changes to CoA organisational structure/role responsibilities. |
| 11    | <b>Table 2: Management techniques for excess soil within Adelaide Park Lands</b> | <p><del>Reuse: can be reused within the same property boundary or elsewhere in the Adelaide Park Lands or CoA asset and infrastructure projects.</del></p> <p>Reuse:</p> <ul style="list-style-type: none"> <li><b>Material classified as WF from a site where potentially contaminating activities (prescribed in the Environmental Protection Regulations 2023) has not occurred can be reused anywhere (including Adelaide Park Lands or CoA asset and infrastructure projects).</b></li> <li><b>WF from a site where potentially contaminating activities has occurred can be used at a non-sensitive land-use site (including Adelaide Park Lands or CoA asset and infrastructure projects). It can also be used at a sensitive site but would trigger the auditor protocol as described in the Standard for the production and use of waste derived fill.</b></li> </ul> | Change of Waste Fill (WF) definition changed to reflect prescribed in EP Regulations.                                    |
| 12-13 | <b>Property Management of CoA Owned Sites; and CoA Property</b>                  | <p>Heading change.</p> <p>(refer to Appendix 7, Operating Process 4)</p> <p>(refer to Appendix 7, Operating Process 5)</p> <p>...recorded in content manager and named appropriately..</p>   | Heading change, added references to appendix items and additional of saving records.                                     |

| PAGE                              | SECTION   | NEW   | RATIONALE FOR CHANGE   |
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|                                   | <b>Administration and Management</b>  |   |  |
| 14-15                             | <b>Aqua Contamination Ground Water and Surface Water contamination and monitoring</b> | <p>... in conjunction with other relevant schedules i.e. Schedule B2...</p> <p>...Refer to section 83A of the EP Act.</p> <p>...under the EP Act.</p> <p>AMLR NRM to Green Adelaide Board</p>   | Additional references to legislation and schedules; and changes to reflect state government board structure. |
| 15                                | <b>Private Land Development and Land Use Planning (Change of Use)</b>                 | <p>Heading change.</p> <p>Planning Advisory Notice 20 changed to Practice Direction 14.</p> <p>Draft Site Contamination Framework for the SA Planning System changed to Site contamination Development Assessment Scheme Code Amendment.</p>  | Updates to reflect changes to the South Australian Planning systems since previous Operating Guidelines.     |
| <b>ROLES AND RESPONSIBILITIES</b> |   |   |  |
| 16                                | <b>Environment Protection Authority (EPA)</b>   | <p>The EPA is a source of general (non-legal) advice on site contamination management process. The EPA is the regulator of the site contamination audit system, maintains sections of the Public Register and holds information relating to land titles. The EPA is the first point of contact when a contamination incident affecting groundwater, emergency/pollution incident and or hazardous circumstance occurs during CoA works.</p> <p>The EPA's roles include to:</p> <ul style="list-style-type: none"> <li>• Administer the Environment Protection Act 1993 (SA) and its Regulations.</li> <li>• Develop Environment Protection Policies and associated Codes of Practice or Standards.</li> <li>• Develop Guidelines in relation to the assessment and remediation of site contamination.</li> <li>• Administer the Site Contamination Audit system.</li> <li>• Review and regulate the Voluntary Proposals process.</li> </ul> | Updated to reflect EPA feedback on their roles and responsibilities.   |



| PAGE | SECTION                                   | NEW  | RATIONALE FOR CHANGE   |
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|      |   | <ul style="list-style-type: none"> <li>Respond to planning applications referred under the Planning, Development and Infrastructure Act 2016 (SA).</li> <li>Provide general advice on legislation and process of site contamination management.</li> <li>Assist with community engagement where warranted.</li> <li>Record information on the Public Register (as per section 109 of the Environment Protection Act 1993 (SA)).</li> <li>Contribute to Form 1 statements under the Land and Business (Sale and Conveyancing) Act 1994 (SA).</li> <li>Ensure that investigations are consistent with the risk-based National Environment Protection (Assessment of Site Contamination) Measures 1999 (NEPM).</li> </ul>   |  |
| 17   | <b>Associate Director, Infrastructure</b> | <p>The Associate Director, Infrastructure's responsibilities include:</p> <ul style="list-style-type: none"> <li>Manage the ESHR.</li> <li>Develop a spatial data layer for the ESHR.</li> <li>Support CoA employees with procedural site contamination matters.</li> <li>Liaise with consultants, Auditors, and the EPA on technical and procedural contamination matters.</li> <li>Liaise with the EPA regarding documentation that needs to be submitted to the <i>Public Register</i> or Property interests (Section 7 of the <i>Land and Business (Sale and Conveyancing) Act 1994</i> and <i>Land and Business (Sale and Conveyancing) Regulations 2010</i>).</li> <li>May provide general advice and assistance to CoA employees with Risk Registers, contract specifications or standard clauses for infrastructure renewal and capital projects.</li> </ul> | Inclusion of Associate Director for add quality assurance and clarify of responsibilities. |

| PAGE  | SECTION   | NEW   | RATIONALE FOR CHANGE  |
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| 17    | <b>Associate Director, Park Lands, Policy and Sustainability</b>                                    | <p>The Associate Director, Park Lands, Policy and Sustainability's responsibilities include:</p> <ul style="list-style-type: none"> <li>• Review and update Council Policy.</li> <li>• Review and update Operating Guidelines in consultation with the Associate Director, Infrastructure.</li> <li>• Provide information and advice (on process) to CoA employees.</li> <li>• Provide general advice to CoA employees on the procurement of site contamination experts.</li> <li>• May provide general advice regarding the review of EMP / SMP submitted or proposed by consultants.</li> <li>• Access the ESHR as a source of information to assist with strategic land-use policy planning, including in the Adelaide Park Lands.</li> </ul>  | Updated role tiles and adjusted to reflect organisational structure/role changes since the previous Operating Guidelines. |
| 17-18 | <b>Manager Infrastructure Delivery, Manager Technical Services, Manager Infrastructure Planning</b> | <p>Managers in the <b>Infrastructure Program</b> are responsible for managing site contamination as part of asset, infrastructure, capital or property projects, as follows:</p> <ul style="list-style-type: none"> <li>• Include site contamination in the initial project risk assessment.</li> <li>• Access the ESHR as the first source of local information regarding contamination in CoA.</li> <li>• <b>Manage the Environmental Site History Register (ESHR) including updating, reviewing or revising with new or amended information.</b></li> <li>• <b>Facilitate information links between the ESHR and other databases (geospatial or operational).</b></li> <li>• Engage suitably qualified experts (consultants / auditor) to provide advice, reports and recommend works as necessary.</li> </ul> | Update titles to reflect organisational structure/role changes and add quality assurance by clarifying responsibilities.  |

| PAGE                          | SECTION  | NEW  | RATIONALE FOR CHANGE   |
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|                               |  | <ul style="list-style-type: none"> <li>Provide information from the ESHR to third party contractors, consultants or auditors as necessary during the procurement phase, contract management or onsite works to ensure EMP's are followed or information is shared to facilitate best practice site contamination management.</li> <li>Report site contamination incidents to EPA.</li> <li>Liaise with the EPA during a Voluntary Proposal process.</li> <li>Provide any site contamination details or documents to the ESHR.</li> <li>Manage and update the information link between ESHR and corporate tools.</li> <li>Incorporate and manage any monitoring requirements over the life of the property asset.</li> <li>Submit monitoring reports to ESHR</li> </ul> |  |
| 18                            | <b>Associate Director, City Operations</b>                   | Heading change.  | Update of titles to reflect organisational structure/role changes  |
| 18                            | <b>Associate Director, Regulatory Services</b>               | Heading change; and change from strategic land-use policy planning to development assessment.  | Update of titles to reflect organisational structure/role and changes to legislation.                                    |
| 19                            | <b>Associate Director, Strategic Property and Commercial</b> | Heading change.  | Update of titles to reflect organisational structure/role changes  |
| 19                            | <b>Manager, Customer and Marketing (refer to Appendix 5)</b> | Heading change and addition of one responsibility: <ul style="list-style-type: none"> <li>Obtain explicit approval from the Chief Executive Officer before providing information to media outlets.</li> </ul>  | Update titles to reflect organisational structure/role changes and add quality assurance by clarifying responsibilities. |
| <b>OTHER USEFUL DOCUMENTS</b> |  |  |  |
| 19-20                         | Related documents  | Updated to reflect changes to CoA policy documents   | Policy documents out of date, renamed or redundant   |



| PAGE            | SECTION                           | NEW  | RATIONALE FOR CHANGE   |
|-----------------|-----------------------------------|--|--|
| 20              | Relevant legislation              | Updated to reflect State and Federal legislation changes   | Legislation changes, renamed or redundant  |
| <b>ACRONYMS</b> |                                   |  |  |
| 20-21           | -                                 | New section added  | A number of acronyms are used throughout the documents and best practice to have them listed within the documents. |
| <b>GLOSSARY</b> |                                   |  |  |
| 21-22           | -                                 | New section added  | Clarify terms used within the Operating Guidelines.  |
| <b>APPENDIX</b> |                                   |  |  |
| 25              | <b>Appendix 1</b>                 | Creation of Appendix 1: Site Contamination Management Framework  |  |
| 26-33           | <b>Appendix 2, 3, 4, 5, and 6</b> | The following text sections were moved to the Appendices with minor updates to tense; legislation changes and CoA organisational structures/roles. The sections include:<br>Site contamination Legislation<br>Site contamination management process<br>Site contamination experts<br>Community information and risk communication<br>Permits, approvals, exemption, authorisations and voluntary proposals | Readability and digestibility of the Operating Guidelines.   |
| 34-38           | <b>Appendix 7</b>                 | Updated Operating Processes 1 through to 5   | Updated to reflect current best practices and internal processes, as well as updating graphics.                    |

