

## NOTICE TO CARRY OUT ENVIRONMENTAL AUDIT PROGRAM

(Issued pursuant to section 48(1) of the *Waste Management and Pollution Control Act*)

**ISSUED TO:** Northern Territory Fire and Rescue Service

**OF:** Level 5, NAB House  
71 Smith Street  
DARWIN NT 0800

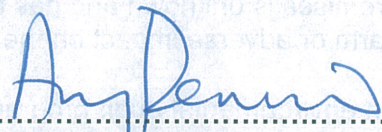
**WHEREAS** the Northern Territory Environment Protection Authority (NT EPA) is satisfied for the reasons stated in **Attachment A** to this notice that you are a person required to carry out an Environmental Audit Program of the Alice Springs Fire Station located at 47 Telegraph Terrace, The Gap, also known as Lot 7728, Alice Springs as delineated in blue in **Attachment C** (the premises) to evaluate:

- (i) **the types, amount, distribution and mobility of contaminants and wastes present in the environment resulting from or in any way connected with NTFRS activities at the premises.**

**NOW TAKE NOTICE** that you are required to comply with each of the requirements specified in **Attachment B** to this notice on and from the date of issue of this notice.

**ISSUE DATE:**

13 September 2021

  
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AMY DENNISON  
EXECUTIVE DIRECTOR  
ENVIRONMENTAL REGULATION  
DELEGATE OF THE NT EPA

### Important Notice

Failure to comply with this notice is an offence under Section 52 of the *Waste Management and Pollution Control Act 1998* and may incur significant penalties and/or other statutory action.

This notice takes effect on the date on which it is served upon you. Pursuant to Section 108 of the *Waste Management and Pollution Control Act 1998*, **you have the right to apply for a review of the decision to issue you with this Notice to carry out an Environmental Audit. If you intend to apply for a review, YOU MUST MAKE AN APPLICATION NOT LATER THAN 28 DAYS after the day on which this Notice of the decision was given.** For information on how to lodge an application for review, contact the Northern Territory Environment Protection Authority, telephone 8924 4041.

Pursuant to Section 112 of the *Waste Management and Pollution Control Act 1998* the person issued with this notice must fulfil certain obligations before selling, leasing, sub-leasing, giving or exchanging land, premises, a vehicle or business which is the subject of this Notice.

## ATTACHMENT A

### REASONS FOR ISSUING THIS NOTICE

1. For approximately 80 years the Northern Territory Fire and Rescue Service (NTFRS) have managed and operated fire stations including but not limited to operational and volunteer fire station across the Northern Territory;
2. The current Alice Springs operational fire station (the premises) opened in 1997;
3. The fire station has a history of using firefighting foams for emergency incidents, in training exercises, and as part of daily maintenance procedures;
4. The current firefighting foams being used at the fire stations across the NT are Class B Foam - Solberg RF6 and Class A Foam - Fire-Brake 3150A, while the legacy firefighting foams used consisted of Aqueous Film Forming Foam (AFFF) such as 3M Lightwater and Ansulite;
5. The legacy firefighting foams contain per- and poly-fluoroalkyl substances (PFAS) compounds that include perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA) and perfluorohexane sulfonate (PFHxS);
6. PFAS contamination is environmentally significant due to its persistence in the environment, its potential for bioaccumulation and high solubility in water, readily leaching from soil to groundwater and can move long distances;
7. Limited and preliminary investigations conducted at the premises identified elevated PFOS and PFHxS concentrations;
8. The full nature and extent of PFAS contamination and pollution at and beyond the premises is unknown and has the potential for environmental harm or risk of future harm or adverse impact on the environment; and
9. An environmental audit program is required to assess and understand the full nature and extent of contamination at and from the premises and the subsequent actions that may be required to address areas of contamination.

**ATTACHMENT B****NOTICE REQUIREMENTS**

1. The environmental audit program (the program) in the form of a Detailed Site Investigation (DSI) must be performed by a person who is registered under section 68 of the *Waste Management and Pollution Control Act 1998* (the Act), in this case an environmental auditor accredited under the New South Wales or Victorian auditor accreditation schemes;
2. The program must relate to the premises, including but not limited to the area(s) where firefighting related activities have occurred, and the storm water drainage system pathways at and beyond the premises;
3. By **no later than 6 months from the date of issue of this notice** NTFRS must complete the DSI to determine the types, amount, distribution and mobility of contaminants and waste, including but not limited to PFAS and other potential contaminants of concern present in the environment as a result of the firefighting related activities undertaken at the premises;
4. The DSI must be undertaken in accordance with the requirements of the *National Environmental Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM) as amended, and the *Northern Territory Contaminated Land Guideline 2017* (NTCLG);
5. The DSI must determine the types, amount, distribution and mobility of contaminants and waste at and beyond the boundary of the premises, 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 remedial action plan (RAP) or management strategy;
6. As part of the DSI, NTFRS must develop a Sampling and Analysis Quality Plan (SAQP);
7. By **no later than 2 months from the date of issue of this notice** the SAQP must be provided to the NT EPA for review;
8. The SAQP must include, but not be limited to:
  - (a) assessment methods to be used to characterise soil, surface water and groundwater (as necessary);
  - (b) data quality objectives;
  - (c) sampling locations within and beyond the boundary of the premises;
  - (d) extent and number of samples to be taken within and beyond the boundary of the premises and any potential areas of concern; and
  - (e) where initial sampling and analysis indicates that the area of impact has the potential to extend beyond the boundary of the premises, the steps which will be taken to provide further sampling and analysis;
9. The SAQP must be developed, reviewed and endorsed (in writing) by a qualified person registered under section 68 of the Act;
10. By **no later than 9 months from the date of issue of this notice** NTFRS must submit the results of the program to the NT EPA as a DSI report, which must include, but be not limited to:
  - (a) a summary of the methods used for sampling, classification and analysis;

- (b) all soil and water sample results and documentation;
  - (c) identification of all environmental risks;
  - (d) recommendations to prevent, rectify, clean-up, rehabilitate or minimise potential environmental harm;
  - (e) written endorsement of the DSI by a qualified person registered under section 68 of the Act that it has been undertaken in accordance with the requirements of this notice, the ASC NEPM and the NTCLG; and
  - (f) details of the qualified person registered under section 68 of the Act; and
11. The qualified person registered under Section 68 of the Act must review the DSI report and if deemed appropriate provide recommendations for additional investigations, remediation and/or monitoring.

ATTACHMENT C  
THE PREMISES



