

Progress Update, August 2019
PFAS Steering Committee

PFAS Action Plan for Tasmania



Tasmanian
Government

Introduction

The PFAS Steering Committee prepared the PFAS Action Plan, and manages the Government's response to PFAS in Tasmania. The committee has delegated actions to the Interagency Working Group. The Committee and the Working Group comprise:

- EPA Tasmania/ Director, Environment Protection Authority (Chair);
- AgriGrowth, Department of Primary Industries, Parks, Water and Environment;
- Department of Premier and Cabinet;
- Department of Health and Human Services;
- Department of Police, Fire and Emergency Management.

The PFAS Action Plan was released in October 2018 and is published here:

<https://epa.tas.gov.au/regulation/contaminated-sites/identification-and-assessment-of-contaminated-land/contaminated-land-issues/pfas-contamination>

It is intended that there will be 6-monthly updates on progress on the Action Plan.

The PFAS Action Plan identifies specific actions and areas of responsibility for implementing the [*Intergovernmental Agreement on a National Framework for responding to PFAS contamination*](#) ('the IGA').

Actions

Actions detailed below aim to align with actions and roles outlined within the IGA and subordinate documents. Refer to the PFAS Action Plan (web address above) for full action descriptions, responsibilities, priorities, estimated costs and reporting information.

This Progress Update provides information on the status of actions as at August 2019.

Action ID	Action Summary	August 2019 Update
1.	<p>Support the Australian Government Department of Environment and Energy with its treaty making process</p> <ul style="list-style-type: none"> - The Department of Energy and Environment leads Australian Government work on the Stockholm Convention on Persistent Organic Pollutants - PFOS, its salts, and perfluoro-octane sulfonyl fluoride (PFOSF) were listed for restriction in 2009 under Annex B of the Convention - The Department has prioritised treaty-making processes to inform a decision by the Australian Government on whether to ratify the listing of PFOS 	<p>No progress to report – ratification is still under consideration by the Australian Government.</p>
2.	<p>Develop PFAS Inventory (Section 6 of PFAS National Environmental Management Plan):</p> <ul style="list-style-type: none"> - Determine ongoing PFAS use. - Determine past PFAS use. - Determine responsibility/location for storage of PFAS containing (e.g. firefighting foams) substances and wastes. - Identify machinery/ plant used in conjunction with above. - Develop and apply a risk rating method - Rank issues in priority order - Data management- shareable formats 	<p>EPA is progressing actions within pre-existing resources.</p> <p>EPA has developed project planning documents that build on a desktop study undertaken in 2016. The project will liaise with managers of known PFAS (storage or use) sites regarding current status, and will aim to identify additional PFAS storage and use sites/areas, incorporate responses into a geodatabase and conduct site prioritisation.</p> <p>The project plan anticipates completion by December 2020.</p>

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3.	<p>Determine lead entities (polluters)</p> <ul style="list-style-type: none"> - As lead entities emerge or self-identify - From the PFAS inventory - From routine regulation (e.g. monitoring landfills, wastewater treatment plants and industry) 	<p>This work is ongoing. Initial inventory work conducted by EPA has identified a number of Lead Entities and they are progressing assessment work.</p> <p>Detailed elsewhere in this plan are works conducted by Airservices Australia, TasPorts and the Department of Police Fire and Emergency Management (DPFEM). Additionally, initial inventory work identified the Australian Maritime College fire training ground as a potential contaminated site; environmental site assessment works are underway.</p>
4.	<p>Integrate PFAS management into routine regulation – <u>contaminated land and water</u></p> <p>Oversee compliance of lead entities with IGA and relevant legislation and/or guidelines, as appropriate</p> <p>EPA Tasmania will request information from lead entities</p> <p>EPA to set guideline rules to be applied to all lead entities to guide its activities, ensure that lead entities are treated proportionately and to ensure that required information is obtained and risks are managed</p> <p>Regulation through the issuing of legal notices and potential enforcement action will only be considered as a last resort to secure compliance</p>	<p>This task is ongoing.</p> <p>EPA is engaging with a number of Lead Entities and assessment and reporting has progressed on 5 sites (see Action IDs 10 and 11). The land is Commonwealth owned for 2 of these sites (Action ID 12).</p> <p>Further sites posing a potential risk are expected to be identified in the PFAS Inventory project (Action ID 2).</p> <p>EPA has set draft Compliance rules to assist assessment of reporting received from Lead Entities, in the absence of Regulatory Notices. EPA will review the functioning of the rules on an ongoing basis.</p>

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5.	<p>Integrate PFAS management into routine environmental regulation – <u>prescribed and other regulated activities</u></p> <p>Integration of PFAS management into routine environmental regulation at level 2 premises (as listed in Schedule 2 of EMPCA)</p> <ul style="list-style-type: none"> - Update Permits for wastewater treatment plants, landfills and other key industry types to ensure: <ul style="list-style-type: none"> • PFAS monitoring • management practices for storage • management to reduce exposure - Update work practices- include compliance assessment - Update guidelines ie <i>Tasmanian Biosolids Reuse Guidelines, Information Bulletin 105</i> - Process approvals re management of PFAS containing substances (e.g. assess applications to manage (including dispose, treat and reuse) PFAS containing substances - Review authority to transport PFAS containing substances (e.g. assess and approve registrations of controlled waste transporters engaged in the movement of PFAS and PFAS containing substances) 	<p>Actions are ongoing. Actions progressed include:</p> <ul style="list-style-type: none"> - <i>Information Bulletin 105 Classification and Management of Contaminated Soil for Disposal</i> was updated in September 2018 with respect to PFAS contaminated soil. https://epa.tas.gov.au/regulation/waste-management/controlled-waste/handling-controlled-waste-in-tasmania/required-approvals-authorisations-for-controlled-waste-management - <i>Biosolids Reuse Guidelines</i> have been revised and are soon to be re-issued; they will then be available at the below webpage. PFAS related amendments are in line with the draft NEMP 2.0, with recommendations to investigate the Wastewater Treatment Plant (WWTP) catchment for likely PFAS sources. https://epa.tas.gov.au/regulation/wastewater/useful-resources-for-wastewater-managers/biosolids - One major landfill regularly monitors for PFAS; the manager also tested marine organisms/ sediment in the downgradient environment and did not detect PFAS. - EPA monitored PFAS in leachate at one landfill and detected low concentrations. Discussions are ongoing with other landfill managers regarding testing. - Discussions are underway between major landfills and EPA regarding acceptance of PFAS contaminated waste. - WWTP effluent tested by TasWater at a number of facilities; the locations chosen were based on the higher risk areas with respect to known or likely PFAS sources. - EPA is working with TasWater to develop a program for also testing biosolids and influent concentrations at a number of key sites. - Four controlled waste handlers approved to transport PFAS containing substances. - EPA facilitated PFAS contaminated waste storage/transport for treatment interstate.

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6.	<p>Ambient Monitoring Program (refer Section 5 of PFAS National Environmental Management Plan)</p> <ul style="list-style-type: none"> - Objective to assess background PFAS levels and to identify other sources not identified by inventory. Identify typical PFAS concentrations in urban vs non-urban catchments - Nominally water sampling in 20 catchments, summer and winter sampling rounds. - Data management/ shareable formats 	<p>EPA is now progressing actions within pre-existing resources. EPA has drafted initial project documents. The objectives are:</p> <ul style="list-style-type: none"> - To measure the concentration of PFAS compounds in a representative selection (~70 locations) of Tasmanian surface and estuarine waters in winter and summer. - To complete the sampling and analysis in accordance with current best practice. - To communicate the results to the public and stakeholders. <p>The Project Plan anticipates a project completion date of end December 2020.</p>
7.	<p>Ongoing contribution to National PFAS management activities</p> <ul style="list-style-type: none"> - Coordination on behalf of Tasmanian Government - Policy gaps - Research 	<p>Agencies continue to engage with national initiatives regarding PFAS management such as meetings of the Australian Government's PFAS Taskforce and National Chemicals Working Group. Documents recently under review include:</p> <ul style="list-style-type: none"> - IGA - Draft NEMP 2.0 –outcomes of public consultation being assessed
8.	<p>Lead Communication and Engagement</p> <p>Further development of PFAS communications plan</p> <p>Coordination of Tasmanian Government website information regarding PFAS Management</p> <ul style="list-style-type: none"> - Update progress on: <ul style="list-style-type: none"> o PFAS Inventory o Coordinate sharing of spatial information o Identification of lead entities o Ambient monitoring results o Summary of compliance activities 	<p>An interagency communications committee ensures that communications activities are coordinated, accurate and timely.</p> <p>Site specific communication for Commonwealth Airports has been managed by a Roundtable comprising the lead entity, land manager, and key Government and industry stakeholders. These discussions focussed on supporting the release of Airservices Australia's site investigation reports for Hobart and Launceston airports and ensuring clear roles for provision of information. The reports were released October 2018 & June 2019:</p> <p>http://www.airservicesaustralia.com/environment/national-pfas-management-program/site-investigations/</p> <p>EPA has updated information on PFAS Contamination on its website (link below), including reporting the results of Airservices Australia's investigations and providing links to State and national guidance documents and management plans.</p> <p>https://epa.tas.gov.au/regulation/contaminated-sites/identification-and-assessment-of-contaminated-land/contaminated-land-issues/pfas-contamination</p>

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		<p>The Tasmanian Department of Health has updated information on PFAS Contamination on its website (link below) and provides the results of its investigation of PFAS in Pitt Water. It has also issued a public health alert for consumption of fish taken from a section of the North Esk River, following a sampling survey.</p> <p>https://www.dhhs.tas.gov.au/publichealth/environmental_health/per- and poly-fluoroalkyl_substances_pfas</p> <p>https://www.dhhs.tas.gov.au/news/2019/do_not_eat_fish_from_north_esk</p>
9.	<p>Policy gaps</p> <ul style="list-style-type: none"> - Mechanism to inform, provide warnings or prevent contaminated surface or groundwater abstraction - Mechanisms to inform potential purchasers of contaminated land or land adjacent to contaminated land (noting absence of statutory notices) - Review of existing planning mechanisms regarding the development of land to more sensitive uses. Are these sufficiently robust in the PFAS context 	<p>This action is ongoing.</p> <ul style="list-style-type: none"> - Addressing public advisories on site-by-site basis i.e. where contaminated groundwater or surface water is identified, affected residents are individually informed. Where there is a need to limit public use of resources e.g. fishing, Public Health Services issue public warning advisories. - The Property Information Request service may be used by the public to determine if EPA has records of contamination or potential contamination on a property. - EPA is considering the inclusion of PFAS contaminated sites that are being managed outside the formal regulatory system (e.g. those on Commonwealth land) on the publically available LIST layer of Notices issued by EPA. - Planning mechanisms - PFAS source sites should be identified under the current system as per other contaminant types.
10.	<p>Sites operated by the Tasmanian Fire Service (TFS)</p> <ul style="list-style-type: none"> - Complete targeted site assessments of prioritised TFS sites. Implement a program of environmental monitoring to monitor and manage the impacts of PFAS use in relation to TFS sites - Complete an inventory of PFAS product held by TFS - Implement appropriate storage and containment facilities for PFAS product held in relation to TFS sites - Mitigate the entry of PFAS impacted waste and storm water into TasWater infrastructure from TFS sites 	<ul style="list-style-type: none"> - Assessments have been completed/reviewed by the TFS PFAS Working Group. Only the Cambridge facility has been identified by the Working Group as requiring further assessment and management. - TFS are finalising an audit and collection of PFAS product held within the organisation; disposal of 9,815 litres of PFAS legacy product has occurred. - DPFEM have worked closely with TasWater to ensure that all outflows from TFS sites are within the standards and limits applied by TasWater. - DPFEM continues to manage site contamination in line with appropriate regulation and guidance. TFS representatives have contacted all property owners whose properties border the Cambridge rivulet to engage with them

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	<ul style="list-style-type: none"> - Assessment of appropriate treatment and remediation practices. Assess the process of applying these practices to third party sites where required 	<p>about PFAS contamination of the rivulet and what impact this may have on their properties and produce (crops and livestock). The Department is managing the impacts of PFAS contamination at the Cambridge site and monitoring downstream impacts in surrounding properties and waterways.</p>
11.	<p>Devonport Airport and other TasPort sites Actions completed to date:</p> <ul style="list-style-type: none"> - Implemented an organisational wide PFAS management framework - Audited and risk assessed all land owned by Tasports - Tested all aqueous film-forming fire-fighting foams (AFFF) stocks & developed a register of all known PFAS containing foam - Completed a detailed site assessment of the Devonport Airport and presented verbally to the EPA - Removed and disposed of PFOS AFFF from harbour tugs for use in destruction trial run by Cement Australia/Geocycle - Worked collaboratively with Cement Australia/Geocycle to obtain an approved and safe method of PFAS disposal - Developed a fluorine free firefighting foam policy - Managed risks re contaminated bilge waters from harbour tugs - Reg. 12 from the EPA re storage facility for contaminated bilge waters & foam <p>FY19 Actions</p> <ul style="list-style-type: none"> - Further investigation of neighbouring properties at Devonport Airport - Present findings to the EPA in writing - Implement management controls at the Devonport Airport - Investigate and develop cost effective treatment and disposal options for wastewater with low PFAS concentrations 	<p>Completed</p> <ul style="list-style-type: none"> - Devonport Airport site assessment and neighbouring property investigations completed Feb 2019. The draft assessment report was supplied to EPA in July 2019 for review. - Management controls at Devonport Airport developed into site management plan. - Commenced study on options for disposal and treatment of diluted PFOS contaminated bilge waters in April 2019. - First disposal of 16,000 litres of stockpiled bilge water completed in May 2019.

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	<ul style="list-style-type: none"> - Reduce and mitigate risks of PFAS containing foams entering marine waters by undertaking the following: <ul style="list-style-type: none"> o Removal of foam concentrate from last harbour tug vessel o Storage/disposal of impacted bilge water from harbour tugs o upgrade/replace Selfs Point Fire Service - fluorine free foam o progressive and risk based replacement of all legacy B Class foam to fluorine free 	<ul style="list-style-type: none"> - Removal of foam from a harbour tug vessel (Godley) to be scheduled in FY 19/20 - Selfs Point Fire Service upgrade project is in process and scheduled for completion in FY 19/20 - Replacement of legacy class B foams to fluorine free planned to occur over a period of 2-5 years
12.	<p>Engage with Airservices Australia to ensure best practice investigation and remediation of contamination for which it has responsibility (includes commonwealth land and adjacent areas onto which pollution has migrated)</p> <ul style="list-style-type: none"> - Hobart Airport - Launceston Airport 	<p><i>Hobart Airport</i></p> <p>Airservices Australia released the results of a Preliminary Site Investigation for PFAS at and around Hobart Airport in October 2018. This focused on PFAS in the drainage from the airport (in and immediately beyond Sinclair Creek). Since the release of the report, Airservices Australia has been conducting a research and development project at the Fire Training Ground. This remediation project treats wastewater generated by the fire fighting training exercises as well as stormwater runoff from the concrete slab. The project will also assist Airservices Australia in identifying a long term feasible solution for the on-site management of PFAS contamination. Airservices Australia is providing regular progress reports to EPA.</p> <p><i>Launceston Airport</i></p> <p>Airservices Australia released the results of a Preliminary Site Investigation for the presence of PFAS on-site at Launceston Airport in June 2019. The investigation was conducted to better understand the extent of contamination associated with the legacy use of fire fighting foams at the Airport. Airservices Australia is planning to undertake a Detailed Site Investigation (DSI) and a number of actions towards the DSI are being progressed; sampling and assessment for the DSI is likely to commence in late 2019.</p> <p>This report did not include off-site sampling. To answer potential public concerns EPA, Inland Fisheries Service and Department of Health coordinated limited sampling of fish in a section of the North Esk River. The fish caught exceeded the 'trigger points' for one type of PFAS chemical (namely PFOS), meaning that further investigation is required. PFAS was not detected in the upstream fish. The findings</p>

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		<p>lead Department of Health to issue a health advisory to not eat fish caught in the North Esk River downstream of Corra Linn Gorge. The advisory will be followed up with signage.</p> <p>For both sites EPA has facilitated a Roundtable engagement process with regular meetings between the Lead Entity and key Government and, where relevant, business stakeholders.</p> <p>The Preliminary Site Investigations for these two sites are available: http://www.airservicesaustralia.com/environment/national-pfas-management-program/site-investigations/</p>



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