Progress Update, July 2021
PFAS Interagency Working Group

PFAS Action Plan
for Tasmania

Tasmanian Government

Introduction

The PFAS Steering Committee prepared the PFAS Action Plan and managed the Government's response to PFAS in Tasmania. The committee has delegated actions to the Interagency Working Group (IWG). 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;
- Department of Police, Fire and Emergency Management;
- TasPorts.

The PFAS Action Plan was released in October 2018 and is published here along with the first progress update dated August 2019:
https://epa.tas.gov.au/regulation/contaminated-sites/identification-and-assessment-of-contaminated-land/contaminated-land-issues/pfas-contamination

It is intended that updates on progress on the Action Plan will be published when warranted.

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 July 2021.

Action ID	Action Summary	July 2021 Update
1.	Support the Australian Government Department of Environment and Energy with its treaty making process - 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	The *Industrial Chemicals Environmental Management (Register) Bill 2020* passed Federal Parliament on 18 March 2021. This establishes the National Chemical Standard which will not be enforceable until each jurisdiction passes legislation. It is anticipated that certain PFAS substances will be listed under the Standard as chemicals with an environmental impact of High Concern. EPA will continue to work with the Chemicals Management and Standards Group to develop a National Implementation Roadmap.
2.	Develop PFAS Inventory (Section 6 of PFAS National Environmental Management Plan): - 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	The original action plan envisaged additional resources to complete this action. Delivery of this action will take longer than originally envisaged and a completion date has not been specified at this point. EPA has initiated project planning documents that build on a desktop study undertaken in 2016.

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3.	Determine lead entities (polluters) - As lead entities emerge or self-identify - From the PFAS inventory - From routine regulation (e.g. monitoring landfills, wastewater treatment plants and industry)	This work is ongoing. Initial inventory work conducted by EPA has identified several Lead Entities and they are progressing assessment work. 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 have occurred and site management actions are progressing.
4.	Integrate PFAS management into routine regulation – contaminated land and water Oversee compliance of lead entities with IGA and relevant legislation and/or guidelines, as appropriate EPA Tasmania will request information from lead entities 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 Regulation through the issuing of legal notices and potential enforcement action will only be considered as a last resort to secure compliance	This task is ongoing. 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). Further sites posing a potential risk are expected to be identified in the PFAS Inventory project (Action ID 2). EPA has set draft compliance rules to assist assessment of reporting received from Lead Entities. EPA will review the functioning of the rules on an ongoing basis.

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5.	Integrate PFAS management into routine environmental regulation – <u>prescribed and other regulated activities</u> Integration of PFAS management into routine environmental regulation at level 2 premises (as listed in Schedule 2 of EMPCA) - Update Permits for wastewater treatment plants (WWTP)`, landfills and other key industry types to ensure: • PFAS monitoring • management practices for storage • management to reduce exposure - Update work practices- include compliance assessment - Update guidelines ie *Tasmanian Biosolids Reuse Guidelines*, *Information Bulletin 105* - 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)	Actions are ongoing. Actions progressed include: - Level 2 Regulators are progressively identifying premises that may have some level of PFAS contamination due to historical use of fire fighting foams. PFAS parameters are being incorporated into monitoring programs at each site. - *Information Bulletin 105 Classification and Management of Contaminated Soil for Disposal* was updated in September 2018 with respect to PFAS contaminated soil. - *Biosolids Reuse Guidelines* have been revised and are available at the below link. PFAS related amendments are in line with NEMP 2.0. Section 7.1.2 of the *Biosolids Reuse Guidelines* states that if the WWTP is serving a larger urban catchment or a catchment containing any potential sources of PFAS, the Producer must sample and analyse the biosolids for these contaminants in accordance with the sampling requirements specified in Appendix B. If found above laboratory reporting limits the Producer must provide this information to EPA Tasmania and discuss appropriate management options. https://epa.tas.gov.au/regulation/wastewater/useful-resources-for-wastewater-managers/biosolids - TasWater reports: - They have screened their highly urban and industrial catchments for potential PFAS inputs. This will be reviewed annually.

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		- They are currently conducting routine testing of PFAS in biosolids produced at 13 mechanical plants based on potential sources in the catchment or there having been historical detections. - Lagoon plants are screened on a case by case basis when desludging approaches. - WWTP effluent was tested by TasWater at several facilities; the locations chosen were based on the higher risk areas with respect to known or likely PFAS sources. - Testing results have been supplied to EPA and ongoing testing will occur where necessary. - One major landfill regularly monitors for PFAS. Two landfills conduct occasional monitoring. - Landfill monitoring programs are being updated to reflect likely risks, which may include PFAS depending on landfill characteristics. - Discussions are underway between major landfills and EPA regarding acceptance of PFAS contaminated waste. At this stage two landfills have provided in principle approval to accept PFAS contaminated soil; acceptance of such wastes would lead to a requirement to regularly test for PFAS in leachate. - Five controlled waste handlers are approved to transport PFAS containing substances. - EPA has facilitated PFAS contaminated waste storage/transport for treatment interstate.

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6.	Ambient Monitoring Program (refer Section 5 of PFAS National Environmental Management Plan) - 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	The ambient monitoring field work has been completed and reporting is progressing. The program: - Measured the concentration of PFAS compounds in a representative selection (74 locations) of Tasmanian surface and estuarine waters in summer and winter 2020. - The results will be communicated to the public and stakeholders. As an adjunct to the ambient surface water monitoring program, a pilot study of biota in the vicinity of four source sites has been completed by EPA with sampling conducted by the Inland Fisheries Service (IFS). Analysis and reporting is not yet complete.
7.	Ongoing contribution to National PFAS management activities - Coordination on behalf of Tasmanian Government - Policy gaps - Research	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. Since the last Progress Update the *Intergovernmental Agreement on a National Framework for Responding to PFAS Contamination* (IGA) has been revised and came into effect February 2020. The IGA now incorporates a National PFAS Position Statement (Appendix D) which sets out a shared vision of governments to reduce future releases of PFAS into the environment. PFAS NEMP 2.0 was also released and forms Appendix B to the IGA.

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		PFAS NEMP 3.0 work programs are progressing with a view to publishing a draft for public consultation in the first quarter of 2022.

8.	Lead Communication and Engagement
	
	Further development of PFAS communications plan
	
	Coordination of Tasmanian Government website information regarding PFAS Management
	- Update progress on:
	  o PFAS Inventory
	  o Coordinate sharing of spatial information
	  o Identification of lead entities
	  o Ambient monitoring results
	  o Summary of compliance activities
		The Australian Government PFAS Taskforce is responsible for whole of government co-ordination of responses to PFAS contamination. The Taskforce established the Australian Information Portal:
		Australian Government PFAS Taskforce | PFAS
		
		In Tasmania an interagency communications committee was established to ensure that communications activities are coordinated, accurate and timely.
		
		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: http://www.airservicesaustralia.com/environment/national-pfas-management-program/site-investigations/
		
		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.
		https://epa.tas.gov.au/regulation/contaminated-sites/identification-and-assessment-of-contaminated-land/contaminated-land-issues/pfas-contamination

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		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. https://www.dhhs.tas.gov.au/publichealth/environmental_health/per-_and_poly-fluoroalkyl_substances_pfas https://www.dhhs.tas.gov.au/news/2019/do_not_eat_fish_from_north_esk
9.	Policy gaps - 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	- 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. - EPA is routinely providing information on request in relation to records of contamination or potential contamination on a property. Work is progressing on replacing this with a publicly available LISTmap layer. - Planning mechanisms - PFAS source sites should be identified under the current system as per other contaminant types.

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10.	Sites operated by the Tasmanian Fire Service (TFS) - 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 - Assessment of appropriate treatment and remediation practices. Assess the process of applying these practices to third party sites where required	TFS report that: - They have completed the identification of priority sites and continue to monitor and manage the impacts of PFAS on those sites identified as the highest priority. - All initial stakeholder engagement down-stream of the Cambridge Training Complex has been completed. - TFS are conducting further investigations on 2nd tier sites where there is potential for PFAS to have migrated from the use area. It is planned that these works will be provided in a report to the IWG by March 2022. - TFS recently conducted additional testing (May 2021) of its Cambridge Training Complex and will continue to communicate, monitor and test the Cambridge Training Complex and those properties affected down-stream (report completed by GHD). Management actions are in place to limit exposure to PFAS contaminated water and soil identified on and offsite. - TFS is reviewing its PFAS Management Plan; a revised/updated version should be completed by December 2021. - Collection of Long Chain C8 Class B foam concentrate has been completed; concentrates are stored in regional locations with disposal to be completed by mid-August 2021. - TFS will be transitioning to a fluorine free (no PFAS) Class B foam concentrate; planned completion by November 2021. Stocks of C6 concentrate will then be collected and disposed of.

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		- TFS will continue to consult with all stakeholders including TasWater, which will be included within the PFAS Management Plan
11.	**Devonport Airport and other TasPort sites** **Actions completed to date:** - 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 **FY19 Actions** - Further investigation of neighbouring properties at Devonport Airport	Completed - Devonport Airport site assessment and neighbouring property investigations completed Feb 2019. The draft assessment report was supplied to EPA in July 2019 for review.

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	- 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 - Reduce and mitigate risks of PFAS containing foams entering marine waters by undertaking the following: 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	- 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. - Removal of foam from a harbour tug vessel (Godley) was completed in 2020. - Selfs Point Fire Service upgrade project is in progress and scheduled for completion 2021. - Replacement of legacy class B foams to fluorine free planned to occur over a period of 2-5 years
12.	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) - Hobart Airport - Launceston Airport	*Hobart Airport* 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 progress reports to EPA.

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		Launceston Airport Airservices Australia released the results of a Preliminary Site Investigation (PSI) 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 has commenced a Detailed Site Investigation (DSI) and undertaken offsite sampling and a water use survey to inform the DSI. The DSI is slated for completion first quarter 2022. Prior to release of the PSI EPA, IFS 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 led the Department of Health to issue a health advisory in 2019 to not eat fish caught in the North Esk River downstream of Corra Linn Gorge. The advisory was followed up with signage. The signage is still in place. 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. The Preliminary Site Investigations for these two sites are available: http://www.airservicesaustralia.com/environment/national-pfas-management-program/site-investigations/

EPA Tasmania

134 Macquarie St
HOBART TAS 7000

Phone: 03 6165 4599
Email: enquiries@epa.tas.gov.au
Visit: www.epa.tas.gov.au