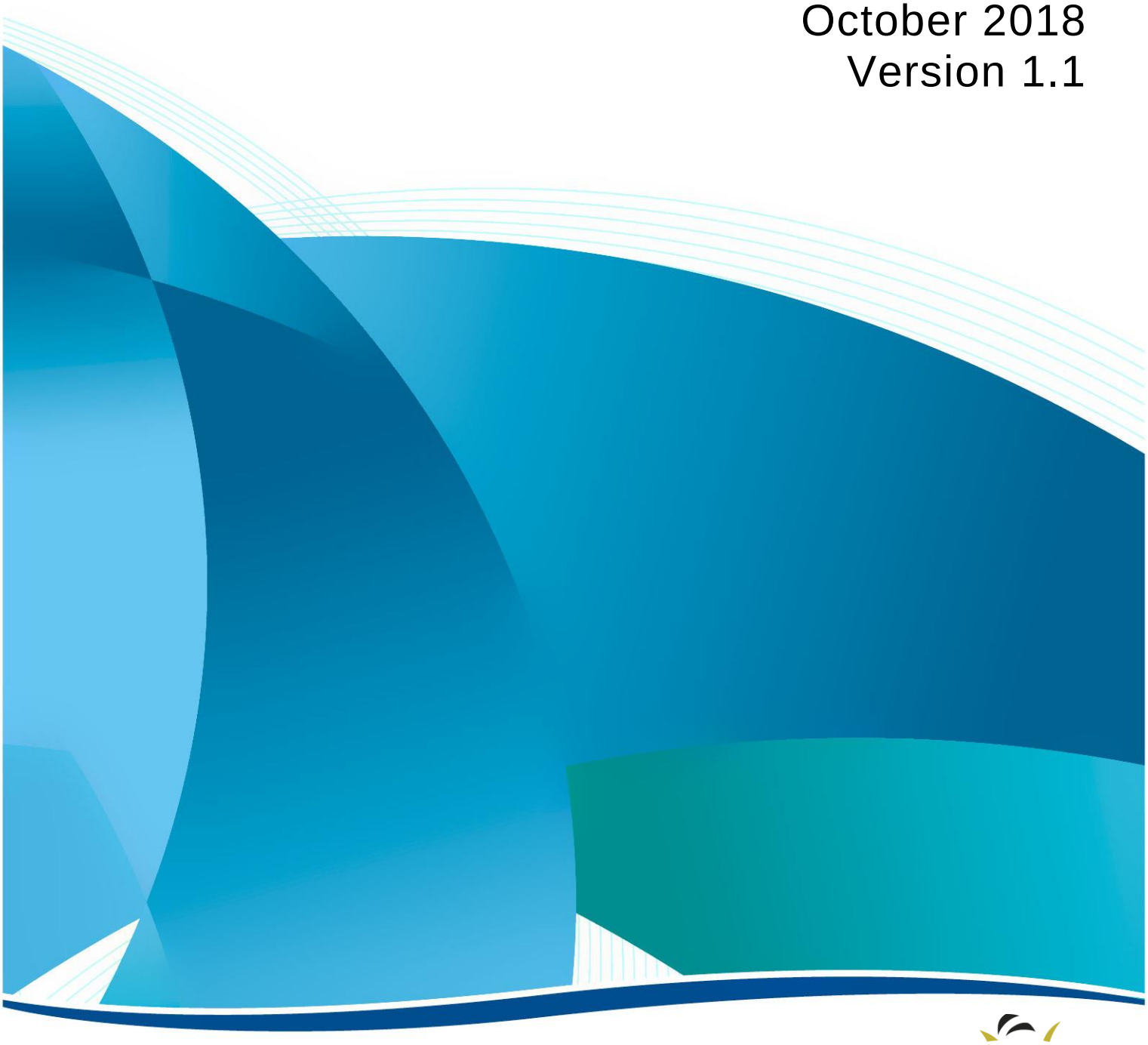
PFAS Action Plan

For Tasmania

October 2018
Version 1.1



Tasmanian Government

Introduction

The following document identifies specific actions and areas of responsibility for implementing the *Intergovernmental Agreement on a National Framework for responding to PFAS contamination (*'the IGA'*)*.

The terms used in this plan have the same meaning as the terms in the IGA and documents subordinate to the IGA.

The subordinate document *PFAS Contamination Response Protocol* defines key terms and details roles of key entities referred to herein.

'Documents subordinate to the IGA' means those documents listed as Appendices to the IGA, and documents referred to within the documents listed as Appendices to the IGA.

Actions

Actions and roles detailed in the Table of this plan aim to align with actions and roles outlined within the IGA and subordinate documents.

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
1.	Support the Department of Energy and Environment 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 perfluorooctane 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	DPAC to lead, EPA Tasmania to support	High	Within existing operational budgets	Interagency Working Group to report to Steering Committee regarding implementation on a 6 monthly basis

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
2.	Develop PFAS Inventory (refer Section 6 of PFAS National Environmental Management Plan): - Determine ongoing PFAS use. Who is still using PFAS containing substances? Where and how are these substances used? - Determine past PFAS use. Who has used PFAS containing substances and where have they been used? For example, where have firefighting foams been used (accident sites, training grounds, other?) - Determine responsibility for storage of PFAS containing (e.g. firefighting foams) substances and wastes and where these substances and associated wastes are stored? - Identify machinery or plant used in conjunction with PFAS containing substances or wastes - Develop a risk rating method - Apply the risk rating method - Rank issues in priority order - Data management. Ensure data is collected in shareable formats o Spatial data. Ensure spatial data is collected in formats that can be shared via ListMap	Private consultancy contract, managed by EPA Tasmania	High	~$100 000, 8 months from awarding of contract.	As above

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
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)	EPA Tasmania (Environmental Regulator)	High	Within existing operational budgets This task has commenced. This task will be incorporated into routine regulatory practice. This is expected to be an ongoing task. Highest risk polluters are expected to be identified in the PFAS Inventory project.	As above
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 - including Australian Government, Tasmanian Government and private interests EPA will set some 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	EPA Tasmania (Environmental Regulator)	High	Within existing operational budgets This task has commenced. This task will be incorporated into routine regulatory practice. This is expected to be an ongoing task. Highest risk areas are expected to be identified in the PFAS Inventory project.	As above

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
5.	Integrate PFAS management into routine environmental regulation – prescribed and other regulated activities Integration of PFAS management into routine environmental regulation at level 2 premises (as listed in Schedule 2 of EMPCA) - Update Permits to include PFAS monitoring for wastewater treatment plants, landfills and other key industry types - Update Permits to include management practices for storage of PFAS containing substances - Update Permits to include management to reduce exposure to PFAS containing substances - Update work practices to include compliance assessment regarding PFAS requirements - Update guidelines with respect to PFAS management (Tasmanian Biosolids Reuse Guidelines, Information Bulletin 105) - Approvals relating to management of PFAS containing substances and review thereof (e.g. assessment of 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)	EPA Tasmania (Environmental Regulator)	Medium	Within existing operational budgets 1 to 5 year timeframe	As above

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
6.	Ambient Monitoring Program (refer Section 5 of PFAS National Environmental Management Plan) - To be commenced as soon as possible based on current knowledge - 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. Ensure data is collected in shareable formats o Spatial data. Ensure spatial data is collected in formats that can be shared via ListMap	Private sector consultancy, managed by EPA Tasmania	High	$300 000 12 months from awarding of contract	As above
7.	Ongoing contribution to National PFAS management activities - Coordination on behalf of Tasmanian Government - Policy gaps - Research	All SC members	Medium	Within existing operational budgets Ongoing	As above

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting

8.	Lead Communication and Engagement
	
	Further development of PFAS communications plan
	
	Coordination of Tasmanian Government website information regarding PFAS Management
	- Update progress on:
	  ○ PFAS Inventory
	  ○ Coordinate sharing of spatial information
	  ○ Identification of lead entities
	  ○ Ambient monitoring results
	  ○ Summary of compliance activities
		DPIPWE corporate to lead interagency communications committee
		EPA Tasmania to prepare communications on behalf of the Director, EPA
			High	Within existing operational budgets
				
				Immediate and ongoing
					As above

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	All SC members to support as required	High	Within existing operational budgets 1-2 years	As above

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
10.	Sites operated by the Tasmanian Fire Service - 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	DPFEM (lead entity)	High	Within existing operational budget 1-2 years	As above

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
11.	**Devonport Airport and other TasPort sites** **Actions completed to date:** - Developed and implemented an organisational wide PFAS management framework - Audited and risk assessed all land owned by Tasports - Tested all AFFF stocks and developed a register of all known PFAS containing foam - Completed a detailed site assessment of the Devonport Airport including an ecological risk assessment. Results of this assessment presented verbally to the EPA - Removed and disposed of 11kL 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 - Proactively managed risks associated with PFAS contaminated bilge waters from harbour tugs including screening of new tugs, standard procedures for controlled transport, storage and disposal - Obtained Regulation 12 from the EPA to establish a consolidated storage facility for PFAS contaminated bilge waters and PFAS firefighting foam	TasPorts (lead entity)	High	Completed by Tasports PFAS program budget	Completed

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting

11. (continued)	**FY19 Actions**
	- Further investigation of neighbouring properties at Devonport Airport
	- Present findings of Devonport Airport site assessment to the EPA in writing
	- Implement management controls at the Devonport Airport in consultation with stakeholders
	- Investigate and develop in collaboration with other Tasmanian Industries and EPA 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:
	  ○ Removal of remaining PFOS containing foam concentrate from last harbour tug vessel
	  ○ Storage and disposal of all identified PFOS impacted bilge water from harbour tugs
	  ○ upgrade and replacement of Selfs Point Fire Service with fluorine free foam
	  ○ progressive and risk based replacement of all legacy B Class foam to fluorine free
				Costs to be managed by Tasports PFAS program budget
				FY 19
				
				FY 19
				
				FY 19
				
				FY 19
				
				Treatment and disposal of PFOS impacted bilge water from Tugs will be required for 2-5 years
				
				Selfs Point Fire service upgrade implemented over 2 year period
				
				Replacement of legacy class B foams to fluorine free 2-5 years
					6 monthly for remaining FY 19 actions

Action ID	Action description	Responsibility	Priority	Estimated cost & timeframe	Reporting
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	Minister for the Environment supported by EPA Tasmania	High	Ongoing collaboration Write to Airservices Australia seeking a progress update and forward plan for Launceston within 1 month (note ~2 years since preliminary study undertaken and immunity claimed)	Interagency Working Group to report to Steering Committee regarding implementation on a 6 monthly basis

EPA Tasmania

134 Macquarie St
HOBART TAS 7000

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