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24 November 2015

Our Ref: HW2015-1156.009

Senator Dean Smith  
Chair, Parliamentary Standing Committee on Public Works  
C/- The Committee Secretary, Parliamentary Standing Committee on Public Works  
PO Box 6021  
Parliament House  
CANBERRA ACT 2600

Dear Senator

**Supplementary Submission: AIR5431 Phase 2 and 3 Defence Air Traffic Management and Control System Facilities Requirements and Australian Defence Force Air Traffic Control Complex Infrastructure Project**

Further to Hunter Water's previous submission (dated 22 October 2015, Attachment A) Hunter Water wishes to make a supplementary submission relating to the Parliamentary Standing Committee on Public Work's inquiry into AIR5431, particularly relating to proposed works at RAAF Base Williamtown.

The NSW Environmental Protection Authority (EPA) have nominated Hunter Water to represent their interest and those of the Williamtown Expert Panel, of which Hunter Water is a member. The Expert Panel established under Division 4 of the *Protection of the Environment Administration Act 1991* (NSW), chaired by the NSW Chief Scientist and Engineer Professor Mary O'Kane, for the purpose of providing informed scientific advice to the EPA to assist in developing the NSW Government's response to the Department of Defence in relation to investigations to characterise and manage its off-site contamination of Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA).

In addition to previous comments, Hunter Water wishes to reiterate comments made by the EPA. Specifically:

- Dewatering activities would likely be required on the site to allow for installation of the tank. Given the relatively high level of groundwater within the aquifer significant volumes of water are likely to be generated. The Defence documentation presently available does not identify how this will be managed.
- Any groundwater extracted as part of the tank installation (or any other dewatering activities required for construction) will require appropriate analysis for PFOS and PFOA, as well as hydrocarbon contamination, and be classified according to the EPA's Waste Classification Guidelines
- All groundwater generated must be managed and stored in a manner such that it does not cause pollution of waters
- All groundwater generated must be treated and/or disposed of in accordance with the requirements of the *Protection of the Environment Operations Act 1997* (NSW).

- All other works in potentially contaminated areas of the Williamtown RAAF Base must be managed so as to not cause or exacerbate pollution from the Base to the surrounding environment and communities.

Given the impacts of present PFOS and PFOA contamination on the Tomago Sandbeds Drinking Water Catchment and surrounding properties, it is Hunter Water's view that the above issues need to be addressed prior to approval of components of the AIR5431 that relate to RAAF Base Williamtown.

Should you require any further information regarding this submission please contact me on 02 4979 9473 or 0437 973 413.

Yours sincerely

**Darren Cleary**  
**Chief Operating Officer**



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22 October 2015

Our Ref: HW 2015-1156.006

Senator Dean Smith  
Chair, Parliamentary Standing Committee on Public Works  
C/- Committee Secretary, Parliamentary Standing Committee on Public Works  
PO Box 6021  
Parliament House  
CANBERRA ACT 2600

Dear Senator Smith

**Submission: AIR5431 Phase 2 and 3 Defence Air Traffic Management and Control System Facilities Requirements and Australian Defence Force Air Traffic Control Complex Infrastructure Project**

I refer to recent correspondence from Wing Commander Rais Khan advising Hunter Water Corporation (Hunter Water) of the proposed new and upgraded facilities on RAAF Base Williamtown, which will support the ongoing provision of air traffic services within Defence-controlled airspace and the Defence components of the Onesky Australia Program.

Hunter Water has reviewed the Department of Defence's submission to the Standing Committee on Public Works (titled *Statement of Evidence to the Parliamentary Standing Committee on Public Works: Air5431 Phases 2 and 3 – Defence Air Traffic Management and Control System facilities and Australian Defence Force Air Traffic Control Complex Infrastructure – various locations throughout Australia*, dated September 2015), and wishes to make the following comments.

Hunter Water is a state owned corporation, which collects and treats drinking water from a number of catchment areas, each of which is gazetted as a designated 'Special Area' under the *Hunter Water Act 1991 (NSW)*. Regulations made under this legislation are in force to protect waters in special areas from impacts such as pollution.

RAAF Base Williamtown is located within the Tomago Sandbeds Catchment Area, which contains a large unconfined aquifer used by Hunter Water to supply high quality drinking water to the Lower Hunter region. The Tomago Sandbeds is an important drinking water supply source for the Lower Hunter. The sandbeds are an important drought-proofing measure and can be used to supply a significant portion of the Lower Hunter's drinking water supply during times of reduced rainfall.

Hunter Water's groundwater modelling shows that the proposed ASC and tower infrastructure is within the draw zone of the drinking water bores that supply drinking water to the Lower Hunter region. As the Tomago Sandbeds are recharged directly from surface infiltration, they are highly susceptible to pollution.

While approvals under NSW law are not required by the Department of Defence for works at RAAF Base Williamtown, such approvals generally do apply to development within the catchment areas in order to protect the region's drinking water supply from potential contamination by pollutants. Given this, Hunter Water has a longstanding cooperative relationship with the Department of Defence in relation to onsite construction and operations at RAAF Base Williamtown. Hunter Water therefore requests the following requirements be implemented for the Project in recognition of that relationship:

- All construction activities undertaken at RAAF Base Williamtown should be performed in a manner which reflects the sensitivity of the Project area as a drinking water catchment. It is further requested that all staff working during both construction and operational phases of the development are made aware of the significance of the area. It is suggested that this could be undertaken as part of site induction and refresher courses for contractors and Defence personnel.
- Stormwater runoff from potentially contaminated areas associated with the Project should be directed away from the groundwater draw zone.
- Given the height of the water table in the area, excavation works may require dewatering. If so, disposal of the potentially contaminated groundwater should be undertaken so that it does not affect any of Hunter Water's drinking water sources.
- All spills of petrochemicals, or other hazardous materials, in unbunded areas during construction or operation of the Project should be cleaned up immediately and reported to Hunter Water as soon as practicable.
- Defence must ensure access to Hunter Water's infrastructure is not impeded throughout the construction and operation periods for the Project.

If you have any questions regarding the above, please contact me on 02 4979 9545 or [malcolm.withers@hunterwater.com.au](mailto:malcolm.withers@hunterwater.com.au)

Yours sincerely



**MALCOLM WITHERS**  
Senior Developer Services Engineer