



Our reference: DOC15/418289

The Committee Secretary
Parliamentary Standing Committee on Public Works
PO Box 6021
Parliament House
Canberra ACT 2600

Dear Secretary

**AIR5431 Phases 2 and 3 Air Traffic Management and Control System Facilities and Australian
Defence Force Air Traffic Control Complex Infrastructure
Submission from the NSW Environment Protection Authority (EPA)**

I refer to the Statement of Evidence to the Parliamentary Standing Committee on Public Works (the Committee) titled 'AIR543 PHASES 2 AND 3 – DEFENCE AIR TRAFFIC MANAGEMENT AND CONTROL SYSTEM FACILITIES AND AUSTRALIAN DEFENCE FORCE AIR TRAFFIC CONTROL COMPLEX INFRASTRUCTURE' prepared by the Department of Defence and Dated September 2015 (the **Report**). The EPA understands that the Committee will accept submission up until 22 October 2015. Please accept this letter as a submission with respect to the inquiry into this matter.

The EPA has reviewed the report and wishes to raise the following points:

- The EPA is currently liaising with the Department of Defence over contamination of ground and surface waters both within and outside the Williamtown RAAF base as a result of the historic use of firefighting foams containing Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA)
- An Expert Panel has been established under Division 4 of the *Protection of the Environment Administration Act 1991* 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 offsite contamination from PFOS and PFOA from the Williamtown RAAF Base.
- The Expert Panel will also provide advice for NSW agencies to inform decisions they may need to make to protect the community and the environment in relation to matters such as the harvesting of oysters, fish and other agricultural products and the use of ground and surface water in areas potentially affected by the offsite contamination.
- The EPA is aware from its review of the Report that as a part of the infrastructure works proposed for the Williamtown RAAF Base, it is proposed to install a 10,000 litre underground diesel tank. This tank will be located in proximity to part of the site where PFOS contamination has been detected.

- The installation of the tank is of particular interest to the EPA as the tank installation would likely require dewatering and subsequent disposal of potentially contaminated groundwater.
- Any groundwater extracted as a part of the tank installation must be subject to appropriate analysis for PFOS and PFOA, as well as hydrocarbon contamination and classified according to the EPA's Waste Classification Guidelines (EPA, 2014).
- All groundwater generated by the tank construction activities must be managed and stored in a manner such that it does not cause pollution of waters as defined in the *Protection of the Environment Operations Act 1997*.
- All groundwater generated by the tank construction activities must be treated and/or disposed of in accordance with the requirements of the *Protection of the Environment Operations Act 1997* and its regulations.
- 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.

If you have any questions in relation to this matter please contact me on (02) 9995 5593.

Yours sincerely

CRAIG LAMBERTON
Director Hazardous Incidents and Environmental Health
Environment Protection Authority