

Tasmanian Government's submission

# Air Services Australia — PFAS Remediation of Former Fire Training Ground at Launceston Airport, Tasmania

January 2024



Tasmania  
Explore the possibilities

## **Summary**

- The Tasmanian Government supports the overarching objective of the proposed remediation work to reduce the overall Per- and Poly-Fluoroalkyl Substances (PFAS) footprint of the Former Fire Training Ground (FFTG) site at the Launceston Airport by removing a known source and thereby reducing overall PFAS exposure pathways. The work is planned to focus on soil remediation with the aim of remediation of 90% of the PFAS contaminated soil within the FFTG site.
- The proposed work is designed to address the PFAS contaminated soil source area on airport land only and does not include soil contamination on the immediate adjacent land. The Tasmanian Government does not currently have the necessary information to determine the extent of residual contamination in the adjacent land and waterways that will not be addressed by the proposed remedial work and the potential environmental impact of that contaminant load on the receiving environment.
- The Committee should also note that funding will also be required for ongoing environmental monitoring work and that additional remediation of PFAS contaminated soil and groundwater may be required.
- It is the Tasmanian Government's position that, in addition to the proposed remediation work of the FFTG site, ongoing responsibility for managing off-site contamination (due to migration of PFAS from airport land) remains with Air Services Australia (ASA) and the Australian Government.
- Management of this liability will include, as a minimum, ongoing monitoring and investigation of residual environmental and health risks, and may include additional remediation works if determined to be necessary.

## ***Supporting Commentary***

The Commonwealth and all states and territories are signatories to the Intergovernmental Agreement on a National Framework for Responding to PFAS Contamination (the National Agreement). A key principle of the Agreement (para. 14(b)) is that governments will cooperate to ‘deliver a more effective, proportionate and efficient response, especially where contamination crosses jurisdictional boundaries.’

The Tasmanian Government understands that residual PFAS remains in soil beneath and surrounding the FFTG site and that this represents an active ongoing source for further PFAS contamination to off-site ground and surface waters. Furthermore, the PFAS contamination has spread several kilometres from the site with significant elevated concentrations detected in surface waters<sup>1</sup> and in eel flesh<sup>2</sup>. Based on the data provided by ASA, concentrations of PFAS in soil off airport land adjacent to the FFTG have been detected at levels above the remediation criteria applied on airport land.

The Tasmanian Government therefore supports the proposed remediation which will assist in addressing the ongoing discharge of PFAS from the FFTG site to surrounding Tasmanian land and waterways. Addressing the source area of contamination is important to reduce the burden of PFAS entering the receiving catchment noting that prioritising source area remediation is consistent with other large scale PFAS remediation projects being undertaken by the Commonwealth. The scale of this investment is also recognised, which would represent one of the largest contaminated land remediation projects ever undertaken in Tasmania.

It is understood that the proposed remedial work is to address the Environmental Remediation Order (ERO) issued 30 March 2023 by the Australian Government’s airport environmental regulator - the Department of Infrastructure, Transport, Regional Development, Communications and the Arts - under the *Airports (Environment Protection) Regulations 1997* (para. 13 of the ASA Submission). The Tasmanian Government cannot comment specifically as to whether the proposed remedial work will address the requirements of the ERO or reduce risks to the environment off airport land to a satisfactory extent under Tasmanian legislation.

The Tasmanian Government notes the Remediation Action Plan (RAP) developed to guide the remedial work (para. 2 Executive Summary of the ASA Submission), while endorsed by Commonwealth Airport Environmental Officer, has not been developed in collaboration with Environment Protection Authority Tasmania (EPA) - the lead Tasmanian Government agency for PFAS contamination issues. Furthermore, the EPA has not been provided with a copy of the RAP for review. The Detailed Site Investigation Report (DSI) and the associated Ecological Risk Assessment (ERA) which inform these works (para. 9-12 of the ASA Submission) have also not been provided to the EPA<sup>3</sup>.

<sup>1</sup> Environment Protection Authority (2022) Tasmanian Ambient PFAS Monitoring Program 2020, Environment Protection Authority, Hobart, Tasmania.

<sup>2</sup> Environment Protection Authority (2022) Preliminary targeted assessment of PFAS in eels downstream of source sites, Environment Protection Authority, Hobart, Tasmania.

<sup>3</sup> NB: human health risks assessments have been provided to Tasmanian regulatory agencies.

Importantly, it is noted that the FFTG is located immediately adjacent (< 10 m) to the north-eastern boundary of the Airport (ASA Submission Appendix 2, Figure 2). While the EPA has not yet been provided with the DSI report, the soil sampling data indicates that the source area of PFAS contamination is not confined to the Airport boundary and extends onto the adjacent private property, as would be expected given the proximity of the FFTG. The proposed remedial work, by only addressing contamination on airport land, will leave a mass of PFAS in soils immediately adjacent to the remediation area, which will continue to leach PFAS to receiving ground and surface waters.

While the Tasmanian Government supports the general concept of PFAS remediation at the FFTG site and understands that the proposed work is seeking to address the requirements of the ERO, the Tasmanian Government is concerned that it does not address that portion of PFAS source area of soil contamination which falls outside the jurisdictional boundary of the Commonwealth.

A key objective of the proposed work is the reduction of risks to the off-airport environment (para. 24 of the ASA Submission). While a review of the DSI and ERA may assist the Tasmanian Government in determining the likely mitigation the proposed works will have on off-site environmental impact, it is possible that it may take many years of ongoing monitoring for mass load flux reduction to the receiving environment to become evident. The success of the proposed works will depend, in part, on the size of the reservoir of PFAS in groundwater on and off-site and the residual mass of PFAS in the total source area.

The Tasmanian Government notes that the RAP (as summarised in Appendix 1 to the ASA Submission) envisages a staged approach to remediation, and that active groundwater remediation may yet be required.

It is the Tasmanian Government's position that ASA and the Australian Government remain responsible for all contamination caused by historical activities at the FFTG site. This includes ongoing responsibility for managing off-site contamination due to the migration of PFAS from airport land.