



DOC22/997224-3

18 November 2022

Isaac Lancaster
Port Stephens Council

(via Agency Concurrence and Referral Portal)

Dear Mr Lancaster

55C Slades Road Williamtown – Change of use to general industry – CNR 48101

I refer to your communication with the NSW Environment Protection Authority (EPA) dated 10 November 2022 inviting comment on the above development application.

The EPA understands the development application is within the Williamtown RAAF Base Management area as shown on [maps published by the EPA](#) showing the Williamtown per-and poly-fluoroalkyl substances (PFAS) Management Area.

Please find in Attachment A to this letter, recommended conditions of consent. These conditions should be included in any consent issued that approves excavation works, with the objective of minimising the risk to the environment when interacting with PFAS impacted soils and groundwater.

Should you require clarification of any of the above please contact Damien Rose on (02) 9995 5586 or email environmentprotection.planning@epa.nsw.gov.au

Yours sincerely

MITCHELL BENNETT
Unit Head - Statutory Planning

Attachment A: Recommended Conditions of consent

The EPA recommends that the following conditions be included if consent is issued:

1. The applicant must identify whether any construction activities could disturb or interact with any PFAS contaminated soil, groundwater or surface water.
2. If construction activities could disturb or interact with any PFAS contaminated soil, groundwater or surface water¹ the applicant must ensure suitable management and mitigation measures are implemented for PFAS contamination during the development works. These include:
 - a. appropriate controls and site housekeeping measures to prevent offsite migration of PFAS contamination.
 - b. measures to prevent, or limit as far as possible, contact and exposure to PFAS impacted material.
 - c. measures to appropriately manage potentially PFAS impacted groundwater that may accumulate in any footings or excavations to ensure this does not run-off the site.
 - d. measures to appropriately manage any PFAS-impacted soils stockpiled at the site, including covering stockpiles to protect from rainfall egress and runoff.
 - e. the appropriate reuse or disposal of PFAS impacted soils.

Note: A PFAS Construction Environmental Management Plan would be an appropriate way to document the measures to be taken.

3. Where PFAS has been identified in soils to be removed from the property, the applicant must sample the soil for PFAS and classify the soil in accordance with the EPA's Addendum to the Waste Classification Guidelines (2014) – Part 1: classifying waste and ensure the lawful management and disposal of the soils.