



Hunter Water Corporation
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29 November 2022

Our Ref: HW2022-1008/15

General Manager
Port Stephens Council
PO Box 42
Raymond Terrace NSW 2324

Attention: Isaac Lancaster

Dear Isaac

RE: DA 16-2022-763-1 – PROPOSED CHANGE OF USE TO GENERAL INDUSTRY AT 55C SLADES ROAD, WILLIAMTOWN

Thank you for Council's letter of 10 November 2022 seeking Hunter Water's comments on the proposed change of use at Lot 103 DP 873512, 55C Slades Road, Williamtown. Hunter Water understands this development will involve alterations and additions to Aircraft Hangar (South) on the BAE site to make the structure suitable for general industry use. Works would include demolition of and within existing structures, the construction of a new storage area and walkway, and installation of a HV substation on the existing hardstand area. The Statement of Environmental Effects (SEE) indicates that the current site drainage system can accommodate the stormwater that would be captured by the new covered structures, with all stormwater directed to Lake Cochran via underground pipes.

The proposed development falls within the Tomago Sandbeds Special Area as gazetted in the *Hunter Water Regulation 2015*. The aquifer can supply up to 30% of the region's drinking water supply, and plays an important strategic function for Hunter Water as a drought reserve. The Special Area requires appropriate management to protect the Tomago Aquifer drinking water source from potential pollution caused by industry or other activities.

The proposed development has the potential to introduce contaminants (oils, greases and chemicals, including PFAS/PFOA) into the sandbeds if appropriate construction and operational procedures are not implemented. PFAS/PFOA compounds are a particular hazard associated with the site. The SEE notes that "*high levels of PFAS contamination within the high-water table around the site...regularly interacts with and contaminates surface water runoff in the area*". It should be noted that surface or groundwater encountered on the site must not be discharged offsite, including to Hunter Water's wastewater network.

Hunter Water requests that, if the development is approved, the following actions are included within conditions of consent for the development:

- Best practice measures for the use, storage and disposal of oils and chemicals must be implemented at all times during construction activities and site operation, including:
 - Undertaking all works involving oils, greases, fuels or other chemicals within a fully bunded and, where possible, covered area; and

- Storing all contaminants and empty contaminant containers within an appropriately bunded and covered area, and disposing of such at a licenced waste facility.
- A Water Management Plan must be prepared, which details measures for the appropriate management of surface water and groundwater, which may contain PFAS/PFOA.
- A Spill Management Procedure is to be implemented on the site. The procedure should include the requirement to notify Council and Hunter Water within 24 hours of any spills occurring where contaminants leave the hardstand, site drainage system, or the site. Consideration should be given to the installation of an oil/water separator to capture hydrocarbons and permanent emergency fuel spill provisions.
- A Construction Environmental Management Plan must be prepared prior to the commencement of works, which includes, but is not limited to, the following:
 - Measures to limit exposure to soils and groundwater during construction works, and details of procedures to be implemented for in-situ assessment of contamination of soils and groundwater (where encountered); and
 - An Erosion and Sediment Control Plan that is consistent with the Landcom guidelines and Council's Development Control Plan and the recommendations of the Drainage Assessment, including:
 - Measures to prevent foreign materials from entering the stormwater network or leaving the site; and
 - Procedures for the appropriate management and disposal of contaminated or potentially contaminated soil and spoil in accordance with the Defence PFAS Management Framework and NSW Waste regulations.

If you require further advice or clarification regarding the submission, please contact me on (02) 4979 9545.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Greg McHarg', with a horizontal line extending to the right.

Greg McHarg
Account Manager Major Development