

Williamtown Sand Syndicate – Per- and Polyfluoroalkyl Substances Annual Risk Review

398 Cabbage Tree Road, Williamtown, New South Wales, 2318

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01 April 2022



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Subject: Williamtown Sand Syndicate – Per- and Polyfluoroalkyl Substances Annual Risk Review
398 Cabbage Tree Road, Williamtown, New South Wales, 2318

Executive Summary

Kleinfelder Australia were engaged by Wedgetail Project Consulting, on behalf of the Williamtown Sand Syndicate (WSS) to undertake a review of the 2021 quarrying activities at Newcastle Sand and determine whether these activities have changed the potential for local residents to be exposed to per- and polyfluoroalkyl substances (PFAS). Regional PFAS contamination in the quarry area is related to contamination at and from the Department of Defence (DoD) Williamtown Royal Australian Air Force Base ("the Base"). PFAS has been identified in sediment, surface water, groundwater and biota (terrestrial and aquatic) within and surrounding the Base.

The Newcastle Sand quarry is located at 398 Cabbage Tree Road, Williamtown ("the Site") and is situated partially within the New South Wales Environment Protection Authority (EPA) defined Williamtown Management Area (WMA). The Site is located within the WMA broader management zone, defined as an area where PFAS could be identified at the current time and into the future. EPA precautionary advice to minimise PFAS exposure within the broader management zone includes avoiding the use of groundwater and surface water and consuming home-grown produce.

This report forms the requirement to Schedule 3 Condition 48 in the Development Consent SSD-6125 which requires an assessment of whether or not quarrying operations are increasing the risk of PFAS exposure for local residents and the environment.

Since 2007, the DoD have been investigating the PFAS presence in various media at and surrounding the Base. The investigations have included multiple rounds of soil, sediment, surface water and groundwater sampling within the EPA defined WMA. Off-Base PFAS surface water and groundwater, PFAS fate and transport models and human and ecological health risk assessments have also been conducted. The human health risk assessment identified four "risk zones", designated zones A through D and corresponding with a risk hierarchy such that Zone A is the highest risk and Zone D is the lowest. Part of the Site is situated within the low-risk zone C, with the north-western Site area located outside the defined risk zones. Zones C and D broadly correspond with the WMA broader management area.

The principal PFAS of concern with the Base and WMA is PFOS, which generally comprises >60% of the PFAS present.

A review of the available information, that includes the Site setting, PFAS sampling and analysis undertaken at the Site and those conducted by the DoD at the Base and surrounding area leads to the following conclusions:

- PFAS migration from primary or secondary Base sources is unlikely to reach the Site.
- PFAS are not present in Site soil.
- In surface water, PFAS are present in the sample collected in the eastern-most Site area (SW4), with 13 out of 24 samples analysed having PFOS concentrations ranging from 0.01 to 0.04 µg/L.



- Detections of PFOS concentrations in all thirteen samples are attributed to background levels and not quarrying operations, hence no increased exposure risk to receptors from quarrying operations has been identified.
- The PFAS in this area is likely sourced from an irrigation channel that is at or near the level of the major channel to the east.
- PFAS are generally not considered present in groundwater. While there have been three sporadic 6:2 FTS occurrences and one PFOS occurrence, these are not considered to represent widespread contamination within the aquifer onsite.
- In 2021 PFAS in the wash plant and sands were assessed:
 - PFAS were below the laboratory LOR in the water entering the wash plant.
 - Low PFAS concentrations (PFOS and PFHxS) were reported in two of five processed water samples.
 - PFAS were below the laboratory LOR in raw feed and processed sand samples.
 - Low PFAS concentrations were reported in wash plant fines (silt and organic material) in three of four samples. The reported concentrations do not exceed the screening criteria.
 - Based on the wash plant sample results, it is probable that a minor PFAS source is present in the wash plant or within the silt and organic material.
- The floor of the quarry is based on maintaining a 0.7m buffer above the maximum predicted ground water level. The only occurrence during 2021 where groundwater levels approached this were following over 460mm of rain in March 2021, where levels at BH1 and BH2 exceeded the adopted Trigger Action Response Plan (TARP) levels.
- At the highest groundwater table levels, quarry floor levels remained at worst 652mm above the groundwater table at all times and did not intercept groundwater. The nearest current quarry floor at that time was located over 130m from BH2. Given there was no interception of groundwater and groundwater is not contaminated, this is unlikely to have resulted in any increased risk to on, or off Site receptors.

The DoD-commissioned human health risk assessment (HRA) determined that the Site is within PFAS Risk Zone C for impacts originating from the Base. This quarry PFAS risk assessment review for 2021 compared the upper exposure scenario (i.e., highest concentration) for risk zone C detailed within the DOD HRA with potential exposures from the quarry and concludes:

- The only product produced onsite where repeatable PFAS detections have occurred and have a potential risk to nearby residents and ecological receptors is the wash plant fines (silt and organic material) where the stockpiled fines could be transported from the Site via dust dispersion. This is unlikely as:
 - Dust mitigation measures undertaken by Newcastle Sand are likely to reduce this risk, and the fines form an agglomerated matrix, more consolidated and bound than existing silts and clays onsite.
 - The PFAS concentrations are below the human and ecological health screening criteria and the risk is therefore acceptable.
 - Fines are approved for use within rehabilitation or to be blended for use as a landscaping product. With the repeated detections of PFAS, prior to offsite removal and sale of the material it will be necessary to assess concentrations within this material to ensure it is suitable and consistent with relevant criteria.
- Other quarrying operations will not increase the PFAS risk to residents because:
 - The only location within the Site boundary that PFAS appear to be routinely present is SW4, which is more than 450 m southeast from the proposed quarry areas, lower in elevation and directly connected to known higher PFAS contamination areas associated with the RAAF Base.
 - PFAS reported at other Site monitored locations are sporadic and do not indicate PFAS contamination is present.
 - Quarrying operations could result in the establishment of a short-term groundwater mound, however, this is unlikely to change the current groundwater flow regime.
 - The Base PFAS groundwater plumes are not estimated to intersect the eastern Site boundary prior to 2050, with the predicted PFAS concentrations unlikely to exceed human health drinking water criteria until significantly after 2050, if at all.
 - Historical prevailing wind directions and dust mitigation measures undertaken by the quarry operator will not result in additional PFAS impacts to nearby residents.



1 INTRODUCTION & OBJECTIVES

Wedgetail Project Consulting commissioned Kleinfelder to undertake a review of DoD and the NSW EPA information regarding PFAS contamination that originated from the Williamstown Royal Australian Air Force (RAAF) Base (“the Base”). The Site is within the NSW EPA declared WMA.

The WMA was established by the NSW EPA following DoD commissioned testing of sediment, soil, groundwater, surface water and aquatic and terrestrial biota which identified a large area affected by PFAS contamination originally sourced from the Base (**Figure 1**). The EPA management area is comprised of three zones:

- Primary – high PFAS concentrations have been observed.
- Secondary – low PFAS concentrations have been identified.
- Broader – topography and hydrology are used to suggest that PFAS could be identified in the future.

The Site is within the broader management area where the Site’s eastern boundary is 1.4 km from the Base’s western boundary.

In accordance with Condition 48 of the quarry approval note an annual review of the current available PFAS information relating to PFAS exposure pathways for contamination originating from the Base is required to be conducted. The review is to assess if the quarrying activities have resulted in an increased PFAS exposure for local residents. Condition 48 states the following:

“In conjunction with preparation of each Annual Review, unless otherwise agreed with the Secretary, the Applicant shall engage a suitably qualified and experienced independent expert, approved by the Secretary, to review the currently available information on exposure pathways for PFAS contamination originating from the Williamstown RAAF Base, as may be applicable to local residents and the development. This report must assess whether or not quarrying operations are increasing the risk of PFAS exposure for local residents and/or the environment, to the satisfaction of the Secretary. The Applicant must ensure that the Review of PFAS Exposure Pathways reports are placed on its website and are available to the CCC and any interested person on request.”

2 OBJECTIVE

The objective of this review is to assess if the quarrying activities have resulted in an increased PFAS exposure for local residents.

3 SITE SETTING

The site is located approximately 1.4 km to the southwest of the Base’s western boundary. The general land use in the vicinity of the Site is large-lot residential and farming. Residential properties are located to the Site’s east, west and south with larger conservation reserves on the northern boundaries. The Tilligerry Habitat Reserve forms part of the western and northern Site boundaries.

The Williamstown area receives a mean annual rainfall of 1,100 mm, with the highest rainfall months typically between January and June, where the monthly mean rainfall typically exceeds 100 mm (Bureau of Meteorology weather station 061078). Mean monthly temperatures range between 17°C and 28°C, indicating the climate is warm temperate. The prevailing 9 AM wind directions at the Base are north-westerly (25%) and westerly (22%), i.e., away from the Site. Calm is the third most common observation (15%). Wind directions toward the Site are north-easterly (6%) and easterly (5%). Predominant 3 PM wind directions are south-easterly (24%) and southerly (16%). Afternoon wind directions toward the Site are easterly (14%) and north-easterly (8%).

Geologically the Site is located within the Tomago Sandbeds, a linear series of shallow sand dunes that cover approximately 200 km² between Newcastle and Lemon Tree Passage, that have a mean thickness of 20 metres¹. The beds were deposited from the Hunter and Karuah rivers during a period of high sea level and overlies clay and rock. The aquifer is the Tomago Sandbeds, with the underlying clay and rock generally acting as a barrier to vertical groundwater migration. The DoD 2020 groundwater hydraulic gradients indicate a potential southerly groundwater flow direction and compared to 2019 a groundwater mound is present to the south of Lake Cochran (**Figure 2**).

¹ Crosbie, R.S., 2003. Regional scaling of groundwater recharge. PhD Thesis, University of Newcastle.

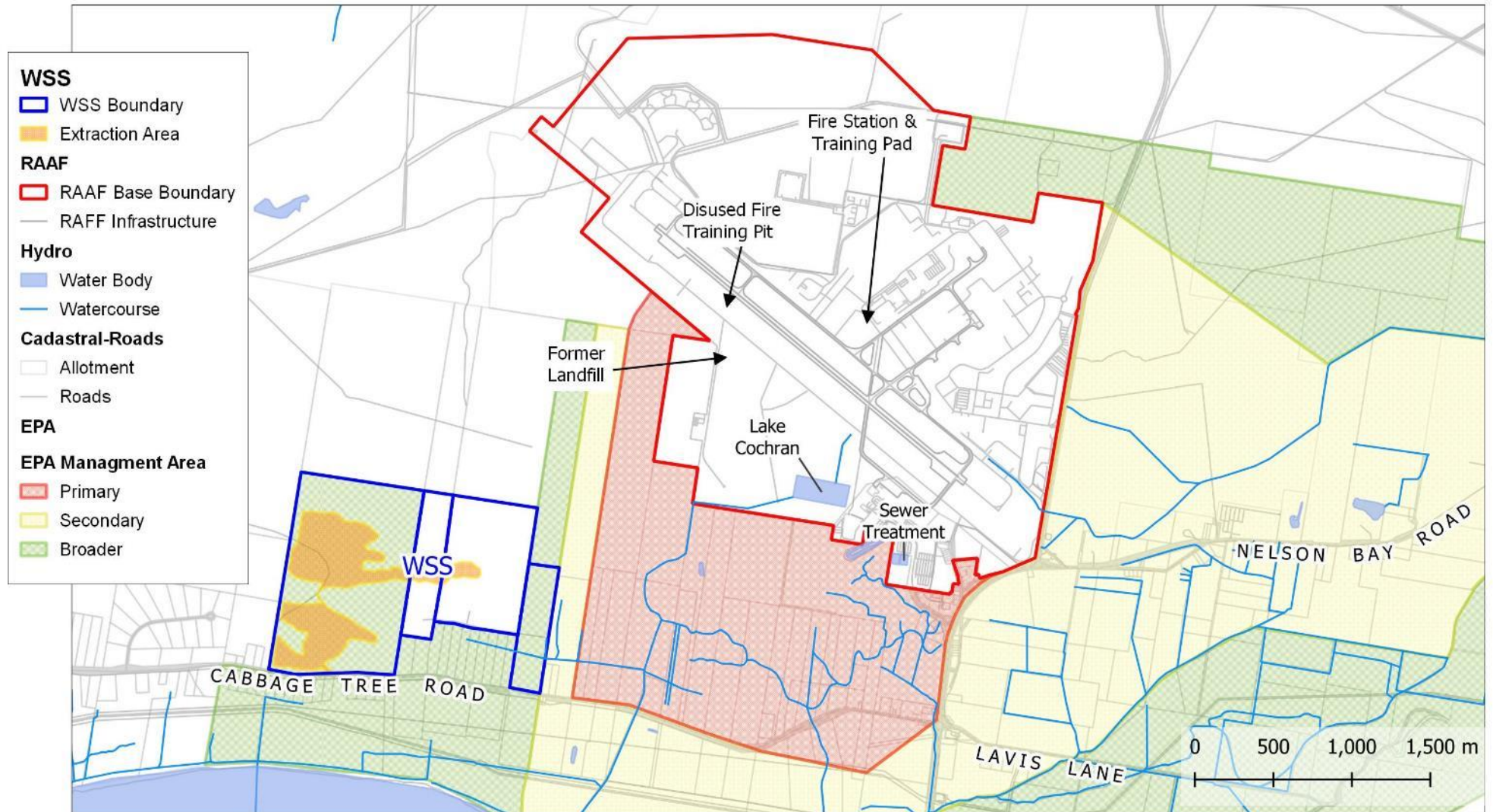


Figure 1. Site regional context.

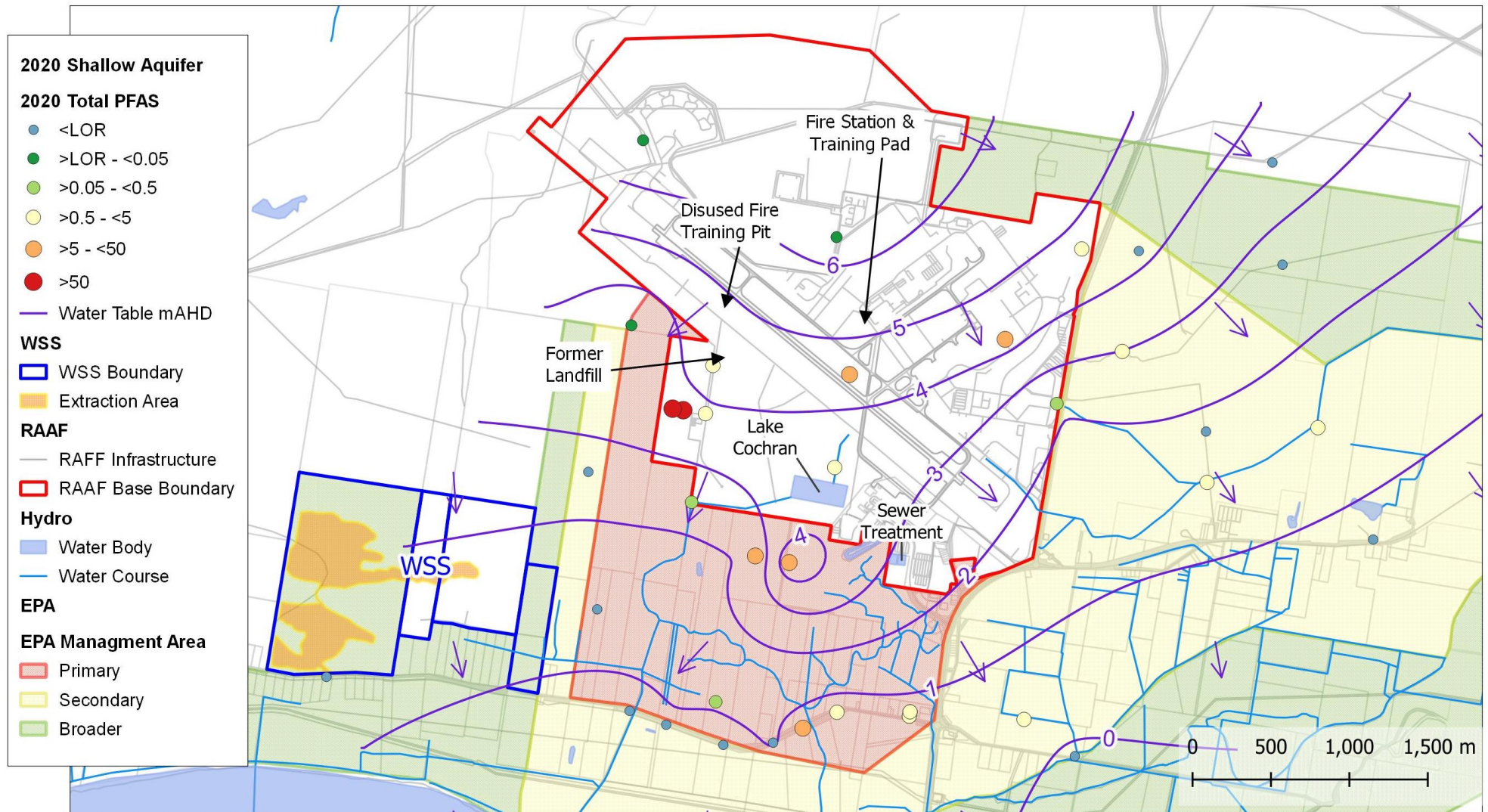


Figure 2. May 2020 shallow aquifer water table elevations, potential groundwater flow direction and total PFAS concentrations.

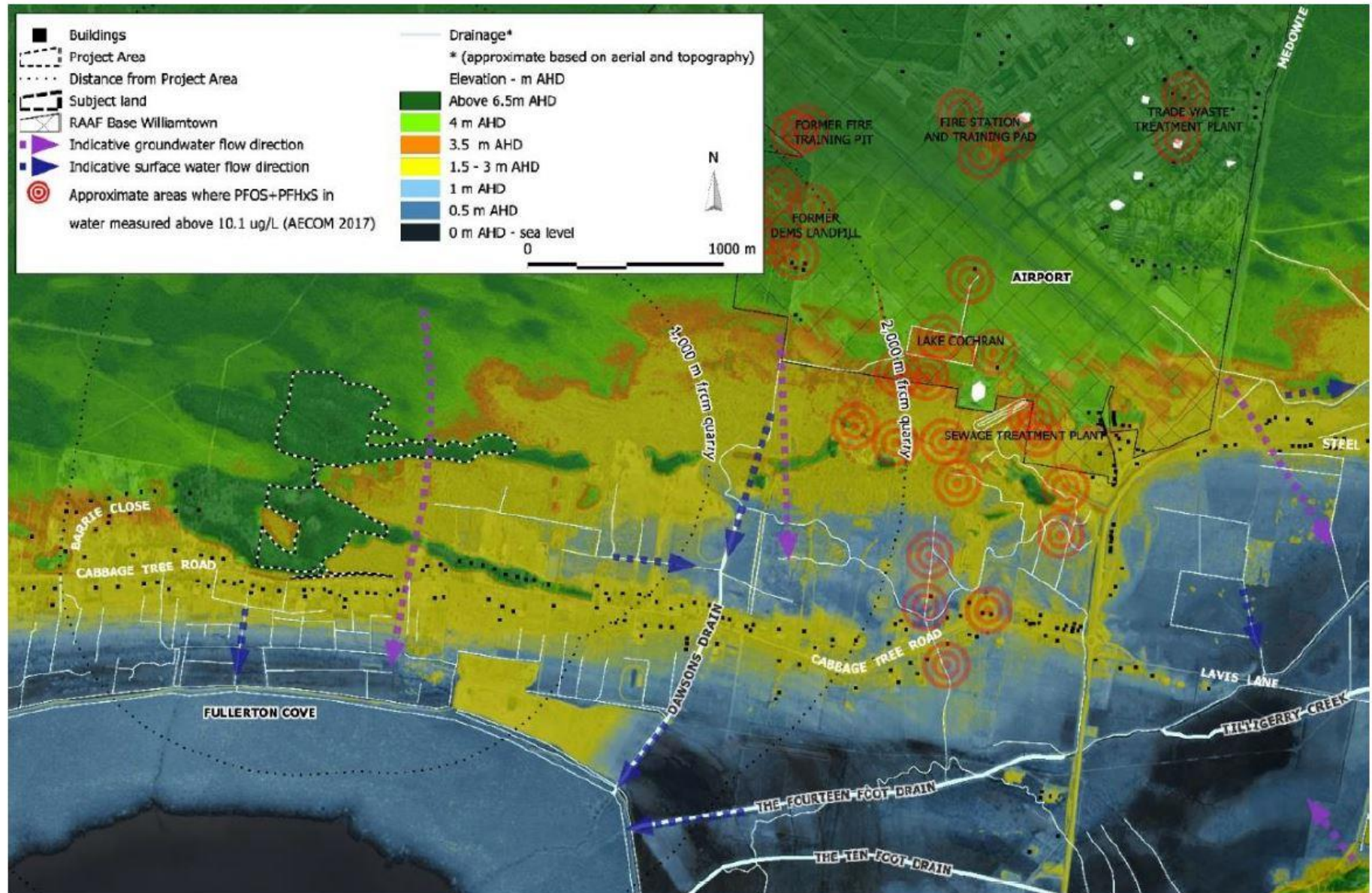


Figure 3. Elevation and drainage network of the project area and subject land in relation to surrounding lands.



The Tomago Sandbeds aquifer form an important water resource in the area. The low salinity groundwater combined with relatively shallow water table depth (mean depth 1.5 m below ground level) have, historically resulted in the extensive use of the resource as a stock watering, irrigation and drinking water supply.

There is a well-developed man-made surface waterway network within the Williamstown area. Site surface water runoff may discharge to two unnamed surface water channels; one channel discharges directly to Fullerton Cove and the other joins Dawsons Drain, approximately 650 metres from the Site's eastern boundary. Within the Base Lake Cochran acts as a stormwater collection point which also discharges to the off-Base Dawsons Drain and ultimately Fullerton Cove to the South. An extract from the SWMP has been included as Figure 3 and shows the current mapping of the drainage network.

4 2020 AND 2021 QUARRYING ACTIVITIES SUMMARY

The subject land where the quarry is located occupies four land titles and has an area of 175 hectares (ha), with the quarry disturbance area occupying approximately 43 ha. Approximately 3.25 megatonnes of sand is planned to be quarried from elevated areas over a period of up to 15 years. Sand will be excavated from an elevation of 24 mAHD to an elevation no less than 0.7 metres above the highest estimated water table elevation. The anticipated minimum excavation elevations are approximately 5.6 mAHD in the north and 3.8 mAHD in the south.

Groundwater is not being extracted by the Site operators for quarrying operations, which rely on water sourced from Hunter Water. WSS have commenced a comprehensive groundwater and surface water monitoring program to monitor water levels and quality from the Site and to ensure that sand is not extracted from an elevation less than 0.7 metres above the maximum estimated water table elevation.

Various works have occurred at the Site throughout 2021 (see **Figure 1** of Kleinfelder²). Planned vegetation clearing occurred to the north of the initial sand stockpiling area (Sector 7B) during April 2021. A wash plant was constructed within the central area of Sector 1 between the months of March and July 2021 and has since been developed to operate an additional sand washing conveyer belt. Sector 3 (west of Sector 7B) has been developed over the last six months of 2021, with clearing occurring to the west (Sectors 3A and 3B).

5 SUMMARY OF PFAS INVESTIGATIONS IN THE WMA

PFAS contamination of surface water, groundwater, sediment and aquatic and terrestrial biota within and surrounding the Base has been reported by both the NSW EPA and DoD. A list of reports is available at www.defence.gov.au/environment/pfas/Williamtown/publications.asp.

The contamination is understood to have been the result of the use of aqueous film-forming foam used during firefighting and emergency response training. The known PFAS contamination sources at the Base are:

- Primary sources – Fire station, two landfills and a disused fire training pit.
- Secondary sources – Lake Cochran, the trade waste treatment plant (eastern Base area) and sewage treatment plant.
 - The trade waste treatment plant is not considered a possible source for PFAS contamination that may occur at the Site.

The surface soil samples collected outside the Base boundaries have been predominantly collected across the southern boundary, south of Lake Cochran and the sewerage treatment area. The PFOS + PFHxS concentrations, which generally make up approximately 90% of the total PFAS concentrations in the Williamstown Management Area, in the off-Base surface soil samples range between the laboratory limit of reporting (LOR), 0.2 and 375 micrograms per kilogram (µg/kg). Two soil samples were collected between the Site and the Base's western boundary. The PFOS + PFHxS concentrations in soil were 0.5 and 0.7 µg/kg, with the closest sample to the Site 350 metres northeast (1.3 km from the disused fire training pit (i.e., a primary PFAS source) and 1.1 km from a former landfill (i.e., a secondary PFAS source).

PFOS + PFHxS concentrations above the laboratory LOR (>0.2 to <10 µg/L) have been observed in all surface water samples collected from channels that receive discharge from the Base. Based on the local drainage network, surface water is not considered a likely pathway for PFAS from the Base to the Site under normal flow

² Kleinfelder, 2022. Annual water quality monitoring results Cabbage Tree Road Sand Quarry, NSW.



conditions. However, backwash flooding is considered likely during high rainfall events and could impact upon the Site.

On- and off-Base PFAS groundwater investigations have focused on the Tomago Sandbeds aquifer with shallow and deep groundwater samples collected and analysed. This review focusses on PFAS concentrations in the shallow aquifer.

The 2020 groundwater Base PFAS monitoring results are summarised in **Figure 2** (above). PFOS + PFHxS concentrations above the laboratory LOR were observed to the south of Lake Cochran, beneath the disused fire training burn-pit, former landfill and current fire station and training pad. From the data reviewed it is evident that there is a groundwater mound to the south of Lake Cochran, suggesting the lake is providing groundwater recharge and is consistent with high PFOS + PFHxS concentrations observed down-gradient from the Lake.

The Site is not directly down-hydraulic gradient from any known primary or secondary Base PFAS source, as shown on **Figure 2**.

With regards to the Base groundwater fate and transport model, four “unidentified” PFAS sources (surface water, soil and or groundwater) located to the Site’s south were identified. It is possible that one of these sources, located near the Cabbage Tree Road Dawsons Drain bridge, is associated with the Lake Cochran discharge. The other three low PFAS concentration occurrences are located to the Base’s south and cannot be directly linked to the source at the Base. The three locations are:

- One Base groundwater monitoring well and three residential monitoring wells located on Cabbage Tree Road, directly south of the Site.
- Groundwater from a residential well located 550 metres to the Site’s south.
- Groundwater from a residential well located to the south of lot DP629503. It is noted PFAS were not present above the laboratory LOR in a 2019 groundwater sample from MW139 located approximately 75 metres up-hydraulic gradient from the residential well.

The PFAS groundwater fate and transport model estimated:

- The Base PFAS groundwater plume areas may expand through PFAS dispersion and diffusion.
- That by 2050:
 - The disused fire training pit and former landfill plumes may merge, although it is noted that the merged plume is unlikely to intersect the Site’s eastern boundary.
 - The Lake Cochran PFAS plume should not intersect the Site’s eastern boundary.
- The probable Lake Cochran sourced off-Base groundwater “unidentified” PFAS occurrence is beneath the Site’s DP814078 parcel (eastern Site area) and has total PFAS concentrations between 0.01 and 0.07 µg/L.

6 SITE PFAS REVIEW

PFAS investigations commissioned by WSS at the Site have involved submission of soil, surface water and groundwater samples to a laboratory that has National Association of Testing Authorities (NATA) accreditation to determine PFAS concentrations in the submitted media. All laboratory results discussed in this report have been compared to the site-specific trigger values established in the Soil and Water Management Plan (SWMP, 2021).

Surface and groundwater sampling locations are shown on (below).

6.1 Soil

Sixteen soil samples collected from 10 bore holes between 7 and 17 December 2016 were submitted for PFAS analysis. The samples were all collected from elevated Site areas where sand quarrying is proposed to be undertaken. All samples, including two samples collected within the eastern Site area, i.e., closest to the Base were reported to have total PFAS concentrations below the laboratory LOR.

6.2 Surface Water

Surface water is monitored at four Site locations. Forty surface water samples collected from the four locations between January and December 2021 were submitted for PFAS analysis. The 2021 surface water results are summarised below:

- At surface sample location SW1, PFOS was reported at a concentration of 0.01 µg/L (equal to the laboratory LOR) in February 2021, and remains below the adopted site-specific trigger value of 0.07 µg/L. PFOS concentrations were reported below the laboratory LOR in all other months of 2021.
- SW2 was dry during January and February 2021 and all PFAS compounds were below the laboratory LOR in the following months.
- PFAS was reported below the laboratory LOR from all samples collected from SW3.
- At the SW4 location:
 - PFOS was reported above the laboratory LOR in January to March 2021 (yet below the site-specific trigger value), and at concentrations equivalent to the LOR in May 2021.
 - PFHxS was reported above the laboratory LOR in January 2021 (yet below the site-specific trigger value), and at a concentration equal to the laboratory LOR in March 2021.
 - SW4 is located on a drainage channel connecting to Dawsons Drain. PFOS detected at this location is likely due to backwater flooding during high rainfall events from Base-related impacts present within Dawsons Drain to the east.

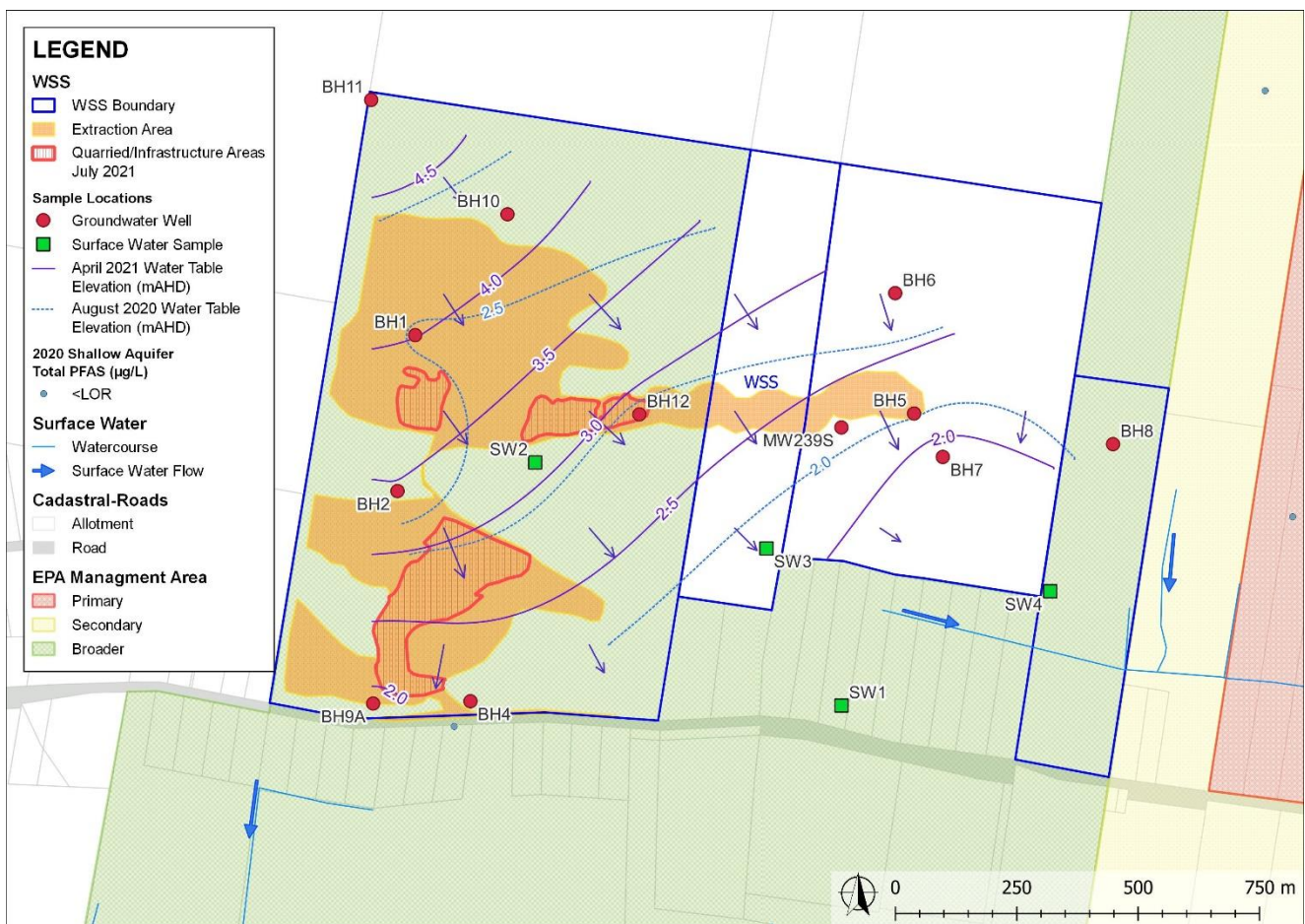


Figure 4. April 2021 and August 2020 water table elevations and sampling locations.

6.3 Groundwater

Groundwater samples were collected using high-density polyethylene HydraSleeves, with the samples transferred directly into laboratory supplied PFAS specific sample containers. The method is considered suitable for the collection of water samples to assess for non-volatile chemicals³.

Twelve groundwater monitoring wells have been installed and sampled at the Site (BH01 to BH12). MW239S, located within the DP629503 land parcel, was installed during the DoD investigations. Groundwater from the well was reported to have 0.03 µg/L PFOS in March 2017, however, during WSS monitoring (sampled once in 2019,

³ Environment Protection Authority Victoria, 2000. Groundwater sampling guidelines. Publication 669.



five times in 2020 and 11 times in 2021) PFAS were below the laboratory LOR. BH10 was dry between installation and April 2021 and two wells have been decommissioned (BH3 and BH9) with BH9A installed as a replacement for BH9 in September 2020.

During the 2021 monitoring, the majority of wells (BH1, BH2, BH4, BH6, BH7, BH8, BH9A, BH10, BH11, BH12 & MW239S) were sampled on a monthly basis, up until September 2021 when the scope of work changed. BH12 became an annual sampling location, while BH8 was sampled on a quarterly basis for the remaining months of 2021.

Water Table Elevation

During the 2021 monitoring period, the maximum water table elevation was in general recorded in April and are historically the highest recorded within the well network and were up to 1.5 m above the elevation recorded in August 2020 (**Figure 4**). The water table elevation contours indicate a southeasterly groundwater flow direction, consistent with the 2019 and 2020 contours.

The floor of the quarry is based on maintaining a 0.7m buffer above the maximum predicted ground water level. The only occurrence during 2021 where levels approached this were following over 460mm of rain in March 2021 recorded at the Williamstown RAAF weather station (# 61078), where:

- Groundwater levels within BH2 exceeded adopted Trigger Action Response Plan (TARP) levels:
 - The 17 March 2021 groundwater sampling event showed levels 1.25m lower than maximum predicted.
 - The 22 April 2021 groundwater sampling event showed levels 0.34m lower than maximum predicted (i.e. TARP Level 1).
 - The 20 May 2021 groundwater sampling event showed levels 0.54m lower than maximum predicted (i.e. TARP Level 0).
 - The logger showed a potential exceedance of the maximum predicted groundwater level of 3.8m AHD by 48mm on 3 April 2021, noting dip and logger levels varied by 39 to 192mm between March and May. This may have been equivalent to TARP level 2 or 3.
 - The logger shows levels were potentially within 0.5m (i.e. TARP Level 1) of the maximum predicted level from 23 March 2021 to 4 June 2021.
- Groundwater Levels within BH1 exceeded TARP Level 1 (i.e. within 0.5m of maximum) on 22 April 2021 by 12mm. All other months were at TARP Level 0.
- It should be noted, quarry floor levels remained at worst 652mm above the groundwater table at all times and did not intercept groundwater. The nearest current quarry floor is located over 130m from BH2. Given there was no interception of groundwater and groundwater is not contaminated, this resulted in no increased risk to on, or off-Site receptors.

In the long-term, groundwater rainfall recharge within the sands is likely to be relatively rapid. The removal of sand above the Site aquifer may result in short-term groundwater mounding, due to increased infiltration and lower evapotranspiration with the mound dissipating due to the high effective porosity of the sands. If a groundwater mound does form beneath the quarried areas, it would be unlikely to significantly change the groundwater flow direction and is more likely to result in producing a steeper off-Site hydraulic gradient. The likelihood that the quarrying would lead to increased groundwater flow from the Base to the Site area is very low.

PFAS

In 2016 and 2017, seven groundwater samples were analysed for PFAS with all concentrations reported below the laboratory LOR.

From the 2019 WSS monitoring, a low 6:2 FTS concentration (0.19 µg/L) was reported for BH6 groundwater and a low PFDS equal to the LOR (0.02 µg/L) was reported for BH4 groundwater, however, the concentrations were below the laboratory LOR in follow-up samples.

Between January and December 2020, groundwater samples from ten monitoring wells (total = 68 samples) were submitted to the laboratory for PFAS concentration determination. One groundwater sample from BH9 (August) was reported to have a total PFAS concentration of 0.14 µg/L, with all other samples below the laboratory LOR. The PFAS above the LOR was 6:2 FTS.



6:2 FTS is rarely above the laboratory LOR in the Base water samples (37 out of 176 groundwater samples had low 6:2 FTS concentrations ($<0.34 \mu\text{g/L}$) and four out of 27 surface water samples had low 6:2 FTS concentrations ($<0.35 \mu\text{g/L}$) during the 2020 DoD monitoring.

In 2021, 87 Site groundwater samples were submitted to the laboratory for PFAS analysis, with one sample (BH4) reported to have PFAS above the LOR; $0.15 \mu\text{g/L}$ 6:2 FTS in the November 2021 groundwater monitoring event.

Groundwater Summary

- 2021 water table elevations are generally higher than in previous years. In particular, there was less than the allowable 0.5 m separation between the inferred groundwater maximum level and measured groundwater elevation at BH1 and BH2 in April 2021 (however returned to more average conditions by the following month).
- The increase in water table elevation is a consequence of the high rainfall between January and March 2021.
- The potential groundwater flow direction is consistent with the observed 2019 and 2020 directions.
- A low 6:2 FTS concentration was reported in a groundwater sample from BH4. Low 6:2 FTS concentrations have previously been reported in groundwater samples from BH6 ($0.19 \mu\text{g/L}$, December 2019) BH9 ($0.14 \mu\text{g/L}$, August 2020). 6:2 FTS is not a COPC at the Base and is therefore unlikely to represent PFAS migration from the Base.

6.4 Wash Plant and Sand Samples

With the approval of a Wash Plant addition to the quarry, a condition of the approval included monitoring for PFAS within the wash plant water and sediment. To provide a greater understanding of PFAS distribution at the Site, the wash plant water (input and output), sediment, and sand (input and output) were submitted to the laboratory for PFAS analysis. The laboratory results are summarised below:

- Wash plant water input - One sample with all PFAS reported below the LOR.
- Wash plant water output - Five samples collected monthly from August to December:
 - PFOS concentrations in samples collected in October and December were 0.01 and $0.03 \mu\text{g/L}$, respectively (laboratory LOR = $0.01 \mu\text{g/L}$). The concentrations are below the adopted criteria ($0.07 \mu\text{g/L}$).
- Four wash plant fines samples (comprising silt and organic particles) were collected from the plant between August and November 2021.
 - Low PFOS (2 samples August and November, both 0.0005 mg/kg) and PFOA (2 samples 19 and 27 August, 0.0006 and 0.0043 mg/kg , respectively) concentrations were reported for the samples, remaining below the site-specific trigger values.
 - All PFAS compounds were below the LOR in September 2021.
- PFAS concentrations in one raw feed sample (RFS, September 2021) were reported below the LOR.
- PFAS concentrations in two washed samples (SAND1 and WASHED) were below the LOR.

Based on the wash plant waste (fines) sample results, a minor PFAS source within the wash plant could be considered. However, it is also likely that low PFAS concentrations within wash plant inputs are concentrated on the silt and organic material.

7 DOD HUMAN HEALTH RISK ASSESSMENT REVIEW

In 2016 the DoD engaged AECOM to undertake an off-Base human health risk assessment (HHRA). The off-Base HHRA was updated in 2017. A summary of the findings of the updated HHRA and relevance to the Site area are provided below.

The HHRA evaluated the potential health risks in the Williamstown area to residents (including recreational and commercial fishers and beef farmers) and non-residents (commercial fishers, council workers and visitors) from exposure to PFAS under both typical and upper exposure scenarios. The exposure scenarios are:

- Typical exposure scenario:
 - Representative of PFAS concentrations that a general or average receptor is likely to be exposed. This is applicable to the majority of the population.
- Upper exposure scenario:



- Calculated based on the PFAS concentration upper 95th percentile in the relevant media and is applicable for receptors that may be in close proximity to media with elevated PFAS concentrations within a localised area, such as a residential groundwater well.
- The upper exposure scenario is considered suitable for quarry workers who would have a generally high risk though ingestion (incidental and via inhalation) and residents near the quarry.

Based on the Stage 2B investigation outcomes the HHRA divided the off-Base areas into zones based on the potential risk that PFAS posed. The Site's local area was designated Risk Zone C (low risk), with the risk zone encompassing the entire eastern Site area and the southern proposed extraction area. For reference the northern extraction area is not within an identified risk zone.

The HHRA determined risks for Risk Zone C upper exposure scenarios (pathways) are:

- Ingestion and contact with groundwater – acceptable.
- Dermal contact with soil and Ingestion of soil and dust – acceptable.
- Consumption of homegrown eggs – **elevated**.
- Consumption of locally grown fruit and vegetables – acceptable.
- Incidental ingestion of surface water – **elevated**.
- Surface water contact – acceptable.
- Incidental ingestion and contact with sediment – acceptable.
- Consumption of beef and milk – **elevated**.

7.1 Relevance of Potential On- and Off-Site Exposures

The HHRA determined potential exposure pathways listed above are considered suitable for off-Site residents and on-Site quarry personnel. For nearby residents and quarry personnel, the comparison of the HHRA upper exposure scenario is considered conservative:

- For dust inhalation/soil ingestion because:
 - PFAS have not been reported above the laboratory limit of reporting in soil samples.
 - Dust mitigation measures are required during quarrying activities.
- For groundwater exposure because:
 - The quarry base will not extend to a depth closer than 0.7 metres to the highest estimated water table elevation, hence groundwater management will not be required and groundwater discharge to surface water as a result of quarrying activities will not occur.
 - PFAS have essentially not been identified above the laboratory LOR in Site groundwater, hence PFAS present in groundwater from nearby residential wells is unlikely to have been sourced from the Site and may be diluted by Site derived groundwater.
 - The designation of Risk Zone C in the Site area was partially based on a very low PFOS concentration from one well, a concentration that was not subsequently repeated.
 - Groundwater migration from the Base is unlikely to reach the eastern property before 2050, by which time quarrying operations will have ceased and any complete PFAS migration pathways will be unlikely.
- While SW1 and SW4 are both down gradient of the Site and have detectable PFAS concentrations above the LOR, the hydraulic connection via surface water is limited due to high infiltration.

Based on the above, the potential for increased PFAS exposure to residents resulting from quarrying activities is considered unlikely.

8 CONCLUSIONS

A review of the currently available information regarding the PFAS contamination originating from the Base and assessed Site derived soil, groundwater and surface water data was undertaken to determine whether quarrying operations will increase the PFAS exposure to nearby residents.

During 2021, sand quarrying activities were ongoing at the Site and expanded into the northern Site area.

Considering the information reviewed, the following is concluded:



- Base-sourced PFAS is and has historically been unlikely to be transported to the Site via wind, surface water or groundwater – the Site does not appear to have received PFAS from the Base and does not appear to be acting as a local tertiary PFAS source.
- A PFAS (predominantly PFOS with minor other PFAS) surface water source appears to be close to SW4 (within the eastern Site area). However, PFOS concentrations in the surface water remain below the adopted criteria.
- The source close to SW4 is attributed to backwash flooding withing the drainage network from Dawsons Creek, reporting to the Base. PFAS sources are not considered to be present within the Site, hence risks to receptors from quarrying operations are acceptable.
- The water table did not exceed the maximum predicted water table elevation by 50mm at BH2 associated with a significant rainfall event. The quarry floor remained 650mm above this level, no increased exposure to groundwater was observed during 2021.
- The regular PFAS detections within the wash plant fines requires further investigation to determine source and suitability of material if used offsite (including the PFAS TCLP requirements).

9 RECOMMENDATIONS

Development of a numerical groundwater flow model that allows for the effects of increased infiltration in the sand extraction areas to be quantitatively assessed should be considered.

If you require additional information or clarification, please contact the undersigned at (03) 9907 6000. This report should be read in conjunction with the Kleinfelder Statement of Limitations (attached).

Sincerely,

Kleinfelder Australia Pty Ltd

Stuart Graham (PhD – Geochemistry)

Associate Hydrogeologist

Attachments – Kleinfelder Statement of Limitations



KLEINFELDER STATEMENT OF LIMITATIONS

This report has been prepared by Kleinfelder Australia Pty Ltd (Kleinfelder) and may be used only by the Client and its designated representatives or relevant statutory authorities and only for the purposes stated for this specific engagement within a reasonable time from its issuance, but in no event later than two (2) years from the date of the report.

This work was performed in a manner consistent with that level of care and skill ordinarily exercised by other members of Kleinfelder's profession practicing in the same locality, under similar conditions and at the date the services are provided. Our conclusions, opinions, and recommendations are based on a limited number of observations and data. It is possible that conditions could vary between or beyond the data evaluated. Kleinfelder makes no other representation, guarantee, or warranty, express or implied, regarding the services, communication (oral or written), report, opinion, or instrument of service provided.

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The findings and conclusions contained within this report are relevant to the conditions of the site and the state of legislation currently enacted in the relevant jurisdiction in which the site is located as at the date of this report.

Additionally, the findings and conclusions contained within this report are made following a review of certain information, reports, correspondence and data noted by methods described in this report including information supplied by the client or its assigns. Kleinfelder has designed and managed the program for this report in good faith and in a manner that seeks to confirm the information provided and test its accuracy and completeness. However, Kleinfelder does not provide guarantees or assurances regarding the accuracy, completeness and validity of information and data obtained from these sources and accepts no responsibility for errors or omissions arising from relying on data or conclusions obtained from these sources.

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Table 1
Conductivity and Alkaline Data - 1984

[illegible]



KLEINFELDER
Bright People. Right Solutions.

Notes:
 - - Not analyzed
 < - Less than laboratory limit of reporting unit.
 - Micrograms per liter
 *** 99% Level of protection in freshwater
 † Soil and Water Management Plan July 2021
 ‡ Denotes duplicate value used.
 § Denotes triplicate value used.
 ¶ Recreational water
 * BSHA 15/09/2020 Sample required dilution prior to extraction due to matrix interferences. LOR values have been adjusted accordingly

Table 2
Surface Water Analytical Data - PFAS
Williamstown Sand Syndicate

[illegible]

Notes:
 - - Not analysed
 < - Less than laboratory limit of reporting
 µg/L - Micrograms per litre
 *** 99% Level of protection in freshwater
¹ Criteria is 1 mg/l
² - Denotes duplicate value used.
³ - Denotes triplicate value used.
⁴ Recreation water

Table 3
Wash Plant Sediment Analytical Data - PFAS
Williamtown Sand Syndicate

Analyte	Perfluoroalkyl Sulfonic Acids						Perfluoroalkyl Carboxylic Acids												Perfluoroalkyl Sulfonamides						(n:2) Fluorotelomer Sulfonic Acids						Sum of PFAS		
	Perfluorobutane sulfonic acid (PFBS)	Perfluoropentane sulfonic acid (PFPeS)	Perfluorohexane sulfonic acid (PFHxS)	Perfluoroheptane sulfonate (PFHpS)	Perfluorooctane sulfonic acid (PFOS)	Perfluorodecane sulfonic acid (PFDS)	Perfluorobutanoic acid (PFBA)	Perfluoropentanoic acid (PFPeA)	Perfluorohexanoic acid (PFHxA)	Perfluoroheptanoic acid (PFHpA)	Perfluorooctanoic acid (PFOA)	Perfluorononanoic acid (PFNA)	Perfluorodecanoic acid (PFDA)	Perfluoroundecanoic acid (PFUnDA)	Perfluorododecanoic acid (PFDoDA)	Perfluorotridecanoic acid (PFTriDA)	Perfluorotetradecanoic acid (PFTeDA)	Perfluorooctanesulfonamide (FOSA)	N-Methylperfluorooctanesulfonamide (MeFOSA)	N-Ethylperfluorooctanesulfonamide (EtFOSA)	N-Methylperfluorooctanesulfonamide (MeFOSE)	N-Ethylperfluorooctanesulfonamide (EtFOSE)	N-Methylperfluorooctanesulfonamide (MeFOSE)	N-Ethylperfluorooctanesulfonamide (EtFOSE)	4:2 Fluorotelomer sulfonic acid (4:2 FTS)	6:2 Fluorotelomer sulfonic acid (6:2 FTS)	8:2 Fluorotelomer sulfonic acid (8:2 FTS)	10:2 Fluorotelomer sulfonic acid (10:2 FTS)	Sum of PFHxS and PFOS	Sum of PFAS (WA DER List)	Sum of PFAS		
LOR	0.0002	0.0002	0.0002	0.0002	0.0002	0.0002	0.001	0.0002	0.0002	0.0002	0.0002	0.0002	0.0002	0.0002	0.0002	0.0002	0.0005	0.0002	0.0005	0.0005	0.0005	0.0005	0.0002	0.0002	0.0005	0.0005	0.0005	0.0005	0.0005	0.0002	0.0002	0.0002	
Units	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg	mq/kg
Adopted Site Specific Trigger Values (SWMP 2021) ¹	-	-	0.01	-	0.01	-	-	-	-	-	0.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01	-	-	
HEPA NEMP 2020***	-	-	-	-	-	-	-	-	-	-	50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	20	-	-	
Sample Name	Sample Date																																
WPF	19-Aug-21	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.001	< 0.0002	< 0.0002	< 0.0002	0.0006	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0006	< 0.0002	< 0.0006	< 0.0006	< 0.0006	< 0.0006	< 0.0006	< 0.0002	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	0.0006	0.0006
WPF (secondary)	27-Aug-21	< 0.0002	< 0.0002	< 0.0002	< 0.0002	0.0005	< 0.0002	< 0.001	< 0.0002	< 0.0002	0.0043	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0006	< 0.0002	< 0.0006	< 0.0006	< 0.0006	< 0.0006	< 0.0006	< 0.0002	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	0.0005	0.0048	0.0048
SAND1 (secondary)	27-Aug-21	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.001	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0005	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0002
RFS	22-Sep-21	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.001	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0005	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0002
WASHED	22-Sep-21	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.001	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0005	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0002
WPF	22-Sep-21	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.001	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0005	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0002
WPF	19-Nov-21	< 0.0002	< 0.0002	< 0.0002	< 0.0002	0.0005	< 0.0002	< 0.001	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0005	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0002	< 0.0002	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	0.0005	0.0005	0.0005

Notes:
 - - Not analysed
 < - Less than laboratory limit of reporting
 mq/kg - Milligrams per kilogram
 *** - Soil Human Health Screening Criteria
¹ Soil and Water Management Plan July 2021

Table 4
Wash Plant Water Analytical Data - PFAS
Williamtown Sand Syndicate

Analyte	Perfluoroalkyl Sulfonic Acids						Perfluoroalkyl Carboxylic Acids										Perfluoroalkyl Sulfonamides										(n:2) Fluorotelomer Sulfonic Acids				Sum of PFAS		
	Perfluorobutane sulfonic acid (PFBS)	Perfluoropentane sulfonic acid (PFPeS)	Perfluorohexane sulfonic acid (PFHxS)	Perfluoroheptane sulfonate (PFHpS)	Perfluorooctane sulfonic acid (PFOS)	Perfluorodecane sulfonic acid (PFDS)	Perfluorobutanoic acid (PFBA)	Perfluoropentanoic acid (PFPeA)	Perfluorohexanoic acid (PFHxA)	Perfluoroheptanoic acid (PFHpA)	Perfluorooctanoic acid (PFOA)	Perfluorononanoic acid (PFNA)	Perfluorodecanoic acid (PFDA)	Perfluoroundecanoic acid (PFUnDA)	Perfluorododecanoic acid (PFDoDA)	Perfluorotridecanoic acid (PFTriDA)	Perfluorotetradecanoic acid (PFTeDA)	Perfluorooctane sulfonamide (FOSA)	N-Methyl-perfluorooctane sulfonamide (MeFOSA)	N-Ethyl-perfluorooctane sulfonamide (EtFOSA)	N-Methyl-perfluorooctane sulfonamide (MeFOSA)	N-Ethyl-perfluorooctane sulfonamide (EtFOSA)	N-Methyl-perfluorooctane sulfonamide (MeFOSA)	N-Ethyl-perfluorooctane sulfonamide (EtFOSA)	4:2 Fluorotelomer sulfonic acid (4:2 FTS)	6:2 Fluorotelomer sulfonic acid (6:2 FTS)	8:2 Fluorotelomer sulfonic acid (8:2 FTS)	10:2 Fluorotelomer sulfonic acid (10:2 FTS)	Sum of PFHxS and PFOS	Sum of PFAS (WADER List)	Sum of PFAS		
LOR	0.02	0.02	0.02	0.02	0.01	0.02	0.1	0.02	0.02	0.02	0.01	0.02	0.02	0.02	0.02	0.02	0.05	0.02	0.05	0.05	0.05	0.05	0.02	0.02	0.05	0.05	0.05	0.05	0.05	0.01	0.01	0.01	
Units	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	
Adopted Site Specific			0.07		0.07						0.56																			0.07			
HEPA NEMP 2020***					0.13						19																			0.7			
HEPA NEMP 2020*											5.6																						
Sample Name	Sample Date																																
INPUT	22-Sep-21	< 0.02	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.1	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.05	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.02	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.01	< 0.01	< 0.01	
WPW	19-Aug-21	< 0.02	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.1	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.05	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.02	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.01	< 0.01	< 0.01	
	22-Sep-21	< 0.02	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.1	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.05	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.02	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.01	< 0.01	< 0.01	
	13-Oct-21	< 0.02	< 0.02	< 0.02	< 0.02	0.01	< 0.02	< 0.1	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.05	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.02	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	0.01	0.01	0.01		
	16-Nov-21	< 0.02	< 0.02	< 0.01	< 0.02	< 0.01	< 0.02	< 0.1	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.05	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.02	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.01	< 0.01	< 0.01	
	15-Dec-21	< 0.02	< 0.02	< 0.01	< 0.02	0.03	< 0.02	< 0.1	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.05	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.02	< 0.02	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	0.03	0.03	0.03	

Notes:

-- Not analysed

< - Less than laboratory limit of reporting

µg/L - Micrograms per litre

*** 95% Level of protection in freshwater - slightly to moderately disturbed systems

¹ Soil and Water Management Plan July 2021

⁴ Recreation water

