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Director Operations/Chief Operating Officer
October 2022















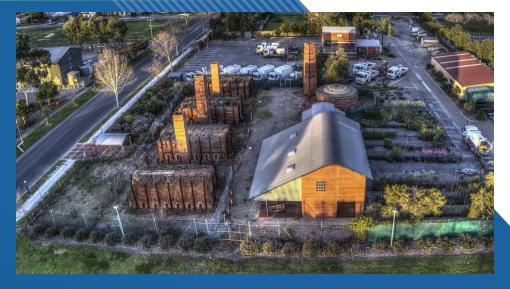
Adelaide, South Australia



Proud industrial past...





























Regulatory framework

- Non statutory agreements
- Voluntary proposals/undertaking: no penalties for non compliance
- EPA Orders/Notices/Directions:
 - May be appealed to a Court
 - Offence for non-compliance
 - EPA can undertake the work and recover costs if non-compliant
 - Costs can be registered against all of the owner's land
- Court orders
- Prosecution (criminal and civil)

Regulatory effort/cost

Prosecution
Court orders
EPA orders
Licence conditions

Environment improvement programmes
Statutory voluntary agreements
Non-statutory agreements



Petroleum hydrocarbons - licencing

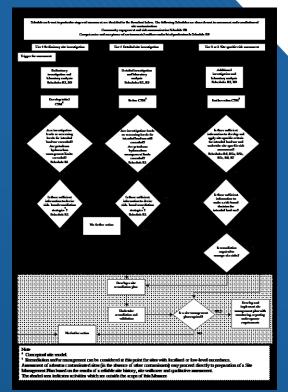
In South Australia, since 1 January 2020 all petrol (service) stations must hold an EPA licence, which requires:

- all tanks and product piping to have an appropriate leak detection system capable of detecting a leak rate of 0.76 L.hr ⁻¹ with greater than 95% confidence and less than 5% false positive;
- equipment integrity testing as soon as reasonably practicable after suspecting a leak;
- EPA notification as soon as reasonably practicable, but in any case within 24 hours if confirmed loss of integrity



Assessment framework

- National Environment Protection (Assessment of site contamination) Measure 1999 – amended 2013 (the NEPM)
- Sets out national standards for assessment of site contamination
- 22 volumes (1274 pages!)



https://www.legislation.gov.au/Details/F2013L00768

Groundwater sampling (passive and active)



Indigenous groundwater values & connections

- In 200 years Australian rivers, waterways, wetlands and aquifers have deteriorated.
- Terra nullius "land belonging to no one" includes aqua nullius, traditional owners were displaced and dispossessed by both.





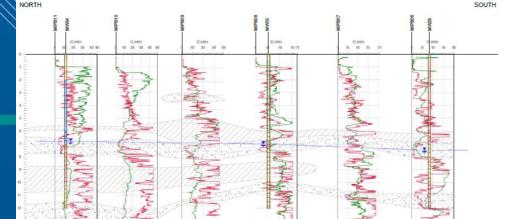


High resolution characterisation





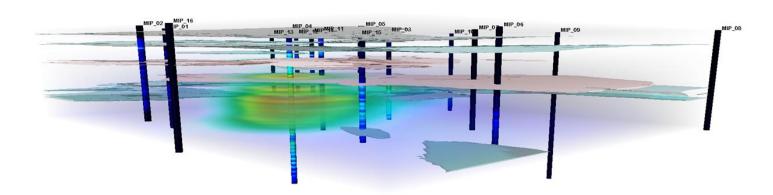






Three dimension contaminant layers





Isosurface HPT 550kPa - clay layers Isosurface HPT 250kPa - permeable layers

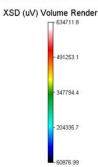


Image credit:



Soil vapour assessment (passive and active)

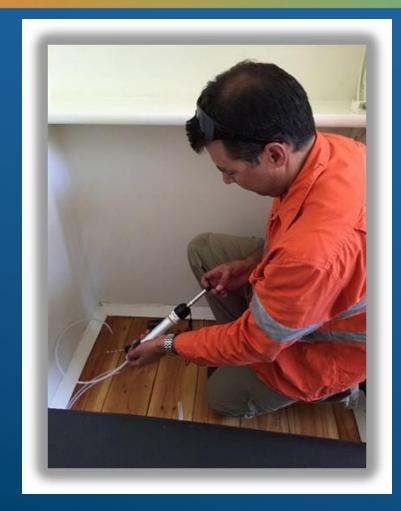








Sub-floor sampling (active and passive)





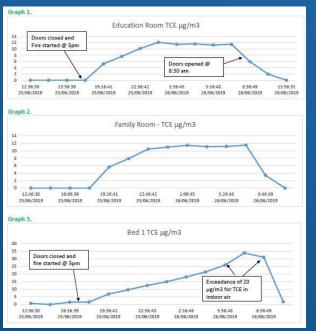


Continuous monitoring











Photos: CSI Australia

TCE data: by room, time, wind speed





PFAS soil remediation









Photo credit: Ventia Pty Ltd



PFAS groundwater remediation







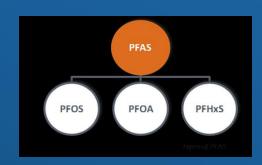
PFAS: Landfill disposal

- Treatment is not required prior to landfill disposal provided that both dry weight and leachate disposal criteria are not exceeded
- single composite lining system:

Parameter	Dry conc (mg.kg ⁻¹)	Leachate (μg.L ⁻¹)
PFOS + PFHxS	50	0.7
PFOA	50	5.6

double composite lining system:

Parameter	Dry conc (mg.kg ⁻¹)	Leachate (μg.L ⁻¹)
PFOS + PFHxS	50	7
PFOA	50	56









NEMP 3.0 Themes

- **Theme 1**: PFAS definition, family examples, International approaches to grouping
- **Theme 2**: Environmental data and monitoring Ambient monitoring data collection and land use classifications
- Theme 3: Water- Risk-based criteria & guidance for beneficial reuse of biosolids
- Theme 4: Soil Behaviour in soil, including leaching, and guideline values
- **Theme 5**: Resource recovery and waste Management of risks associated with PFAS in resource recovery products
- **Theme 6**: Site specific guidance Guidance on principles and approaches to remediation and management; construction water; and estuarine, coastal and marine sediment



Biosolids risk-based criteria

- Provides criteria for PFOS+PFHxS & PFOA
 - Restricted use (similar to Class B)
 - Unrestricted use up to 50 T/ha (where relevant)
- Maximum allowable soil concentration criteria (MASCC)
 - ❖ Calculate CLBAR
- Margins of safety
 - Precursors
 - Multiple exposure pathways
 - Site specific risks

Table 1 Criteria for PFOS+PFHxS and PFOA in biosolids and maximum allowable soil contaminant concentrations (MASCCs) based on a 1, 2 and 5-fold margin of safety

Criteria type	Margin of safety	PFOS+PFHxS (μg/kg)	PFOA (µg/kg)
Restricted use biosolids	5	6.2	25
	2	15	65
	1	31	130
Unrestricted use biosolids a	5	0.22	1.0
	2	0.55	2.5
	1	1.1	5
MASCCs	5	0.22	1.0
	2	0.55	2.5
	1	1.1	5

[&]quot;Unrestricted use threshold may not be applicable in all jurisdictions. Where is it applicable, it should be applied to the final biosolids product for land application.

Theme 5 – Key data gaps

- What are the risks associated with PFAS in organic waste materials, and how can they be minimised, mitigated or managed?
- Are standard sampling and analysis protocols for soils suitable for organic waste materials?





Other EPA work



- Climate change
- Hydrogen power
- Green manufacturing
- National container deposit scheme

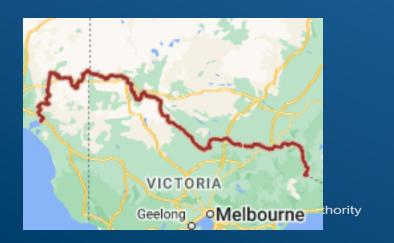


High rainfall events

South Australia annual water usage: 100GL River Murray:

• 1974: 110 GL per day

December 2022: 130-160GL/day









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