

From: RICE John [John.Rice@des.qld.gov.au]
Sent: Tuesday, 13 February 2018 4:58 PM
To: BLANCHARD Scott; HILL Chris
Subject: FW: FOR URGENT ADVICE PLEASE: ESR Alert - Direction Notice to be issued to Wood Mulching Industries Swanbank due to detected PFAS levels

FYI

From: CONNOR Andrew
Sent: Tuesday, 13 February 2018 4:57 PM
To: RICE John <John.Rice@des.qld.gov.au>
Subject: FW: FOR URGENT ADVICE PLEASE: ESR Alert - Direction Notice to be issued to Wood Mulching Industries Swanbank due to detected PFAS levels

As discussed, FYI

Andrew Connor

Executive Director



**Industry, Development & Southeast Queensland Compliance
Environmental Services and Regulation**

Department of Environment and Science

P 07 3330 6335

Level 8, 400 George Street, Brisbane QLD 4000
GPO Box 2454, Brisbane QLD 4001

EHP Cultural capability_web graphic APPD



From: CONNOR Andrew
Sent: Tuesday, 13 February 2018 4:37 PM
To: TRACEY Alena <Alena.Tracey@des.qld.gov.au>
Cc: DAUNT Bettina <Bettina.Daunt@des.qld.gov.au>; Ellwood Dean (<Dean.Ellwood@ehp.qld.gov.au>
<Dean.Ellwood@ehp.qld.gov.au>
Subject: RE: FOR URGENT ADVICE PLEASE: ESR Alert - Direction Notice to be issued to Wood Mulching Industries Swanbank due to detected PFAS levels

Hi Alena,

The sampling was conducted as part of a broad general program and involved sending samples from multiple sites for analysis against a broad range of potential contaminants. As such there was no suspected issue that we were targeting and no request for a priority turnaround from the laboratory.

The timeline:

- All samples from the program were taken directly to the ALS lab at Stafford on Wednesday 21 December 2017.
- Preliminary results were received on 18 January 2018 that the department had received the results from the lab. The

results were individual for each of the sampling events/sites and were collated prior to submission to our technical support team for review on 19 January.

- On the basis of results reviewed, on 25 January a further request was submitted to the laboratory to undertake further analysis of the samples (leachability testing).
- Results from the additional lab analysis was received by the department on Tuesday 6 February 2018. Results were forwarded to Technical Support immediately following receipt of the results on Tuesday 6 February 2018.
- Following review of the results Technical advice was provided to our compliance officers on 8 February highlighting the elevated levels and leachability concerns of PFOS in the WMI compost.
- WMI was contacted on 9 February and advised not to allow material to leave the site until further testing was undertaken, with the Direction Notice formalised on 12 February.

DES has liaised with QLD Health at both the local Public Health unit level at Ipswich and also the central Health Protection Branch regarding the result. QLD Health advises it does not consider that we are looking at a significant health risk issue here, although we will continue to liaise with them around further sampling results when they are available. Given that our information to date is only associated with one sample, it is important that further testing is now completed. On the basis of one sample result the action we have taken to limit further sale of material while further testing occurs is a strong response.

There remain environmental risks for the department to consider, given the potential for PFAS to accumulate over time in the environment.

Regards,

Andrew Connor

Executive Director

Industry, Development & Southeast Queensland Compliance

Environmental Services and Regulation

Department of Environment and Science

P 07 3330 6335

Level 8, 400 George Street, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

EHP Cultural capability_web graphic APPD



From: TRACEY Alena

Sent: Tuesday, 13 February 2018 3:33 PM

To: ELLWOOD Dean <Dean.Ellwood@des.qld.gov.au>

Cc: LOWE Trinity <Trinity.Lowe@des.qld.gov.au>; DLO DES <DLO.DES@des.qld.gov.au>

Subject: FOR URGENT ADVICE PLEASE: ESR Alert - Direction Notice to be issued to Wood Mulching Industries Swanbank due to detected PFAS levels

Hi Dean

With respect to this issue, can you please advise:

- Why the results from the sampling took until now to be known (2 months) – do we have a timeline that explains the process
- Given the significant concern and view that levels are not considered safe for residential use, if Queensland Health is being advised and consideration of issuing a Public Health Risk notice is underway. Of if not, why not

Thanks
Alena



Alena Tracey

Senior Director

Office of the Director-General

Department of Environment and Science

E alena.tracey@des.qld.gov.au

P: + 61 7 3807 8406 M: s 78B(2)

Level 32, 1 William Street, Brisbane Qld 4000

From: LOWE Trinity

Sent: Friday, 9 February 2018 4:14 PM

To: ESR; Jamie.merrick@qld.gov.au; Daniel Lato; ELLWOOD Dean; Ben Doyle; TRACEY Alena; Media DES; Sophie Dwyer

Cc: DLO DES; SDLO@health.qld.gov.au; Justin Carpenter (justin.carpenter@premiers.qld.gov.au); Kahil Lloyd; ESR; STEELE Mary; SENGERS Nathalie; MCMAIN Lisa; BROWN Glen; CAGNEY Justin; CARLOS Reuben; CONNOR Andrew; GOLDSWORTHY Stephen; FOMIATTI MINNESMA Ingrid; LENZ Anne (DES); LINO Starsky

Subject: ESR Alert - Direction Notice to be issued to Wood Mulching Industries Swanbank due to detected PFAS levels

ALERT CATEGORY:

- Enforcement activity

CUSTOMER DETAILS:

- Wood Mulching Industries Pty Ltd (WMI).
- Cumner Road, Swanbank QLD.

SUMMARY OF ISSUE/S:

- In December 2017, the Department of Environment and Science (the department) undertook a 'Compost Final Product Sampling Program' at six commercial composters in South East Queensland.
- The objective of the Program was to better understand whether current feedstocks being used in various composting processes were being appropriately managed and what level of risks exist from the final product/s to the environment and end users of the product/s.
- The department has received the results from this sampling and a preliminary analysis has been undertaken by departmental technical support officers.
- The results and analysis have indicated that PFAS has been identified at above detection levels at three of the sites.
- One of these sites, WMI, had levels of PFAS present that that are cause for significant concern. The sum of PFOS and PFHxS totals were at a maximum of 0.299 mg/kg which is 33 times the relevant residential PFAS

National Environmental Management Plan (NEMP) level of 0.009 mg/kg.

- These results for WMI have resulted in a recommendation of immediate intervention to establish the extent of the PFAS issues at the site (i.e. was this a one-off batch that was impacted, or is this a more systemic issue).
- Technical advice also suggests that there are sufficient grounds to require the site to cease the release of all product until it is proven to be below the NEMP residential threshold for PFAS contamination and that if the issue is found to be systemic, product recall may also be an option.

POTENTIAL IMPACTS / RISKS:

- Based on the department's technical analysis of the sampling results, the material has been shown to be extremely leachable.
- PFAS are persistent and highly resistant to physical, chemical and biological degradation.

CUSTOMER ACTIONS:

- In addition to the immediate response, it is intended to require WMI to undertake an Environmental Evaluation to determine the extent of any contamination, which will likely include further product sampling, site and surrounds sampling, and feedstock sampling.

DEPARTMENT ACTIONS:

- Based on the advice as received from DES technical support officers, ESR Ipswich Compliance is preparing a Direction Notice to prevent the movement of any compost material from the WMI site until further sampling and analysis can be undertaken to determine the extent of the issue.
- On 9 February 2018 the holder of the Environmental Authority has been alerted to the issue and advised that he should not allow material to leave his site until it is demonstrated to be safe.
- It is expected that the Direction Notice will be issued Monday 12 February 2018.
- The department will conduct additional sampling of the compost on Tuesday 13 February 2018.
- The department is preparing media holding response regarding the matter.

LOCALITY DETAILS AND PHOTOGRAPHS:

- Cumner Road, Swanbank, QLD.

KEY COMMUNICATION MESSAGES:

- PFAS is a significant concern to the department and community and prompt action is therefore required to address the matter.
- Significant media interest may result from the department's enforcement actions.
- A Direction Notice restricting the movement of compost product from the WMI site for an extended period until all sampling is conducted and analysed s 78B(2)

CONTACT DETAILS:

- Name: Andrew Connor, Executive Director, IDSQC
- Phone number: (07) 3330 6335
- Division: Environmental Services and Regulation

This email is an initial alert in respect of this matter.

If further advice or action is required, it will be communicated via normal channels such as a briefing note.

END



Trinity Lowe

Executive Officer

Office of the Deputy Director General

Environmental Services and Regulation Division

Department of Environment and Science

P 07 3330 5812

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RTI Act 2009

From: BLANCHARD Scott [Scott.Blanchard@des.qld.gov.au]
Sent: Monday, 26 February 2018 10:04 AM
To: HILL Chris; Corro DES ESR EESWQC
CC: CARLOS Reuben; SUMMERVILLE Sinead; CONNOR Andrew
Subject: ESR Alert - WMI - PFAS in Final Product Compost

Importance: High
Follow Up Flag: Follow up
Flag Status: Completed

Hi Chris

An updated Alert for your consideration/progression.

Thanks

Scott

Subject: ESR ALERT – WMI: PFAS in Final Product Compost

ALERT CATEGORY:

- Environmental incident.

ALERT NAME:

- WMI: PFAS in Final Product Compost.

CUSTOMER DETAILS:

- Wood Mulching Industries Pty Ltd (WMI).
- Cumner Road, Swanbank QLD.

SUMMARY OF ISSUE/S:

- In December 2017, the Department of Environment and Science (the department) undertook a 'Compost Final Product Sampling Program' at six commercial composters in South East Queensland.
- The objective of the Program was to better understand whether current feedstocks being used in various composting processes were being appropriately managed and what level of risks exist from the final product/s to the environment and end users of the product/s.

· Preliminary samples from the Program indicated that one of these sites, WMI, had levels of PFAS present that that are cause for significant concern. The sum of PFOS and PFHxS totals were at a maximum of 0.299 mg/kg which is 33 times the relevant residential PFAS National Environmental Management Plan (NEMP) level of 0.009 mg/kg.

· On 13 February 2018, departmental officers attended WMI's site and undertook additional sampling of both compost windrows and adjacent on-site ponds to further investigate the extent of PFAS issues at the site.

· The sampling results of the compost from the 13 February 2018 indicate that the sum of PFHxS and PFOS was between 0.0236 and 0.0308 mg/kg, still well above the residential criteria of 0.009 mg/kg.

· The sampling results of the on-site ponds from the 13 February 2018 indicate that PFOS was between 14.0 and 21.2 µg/L, which significantly exceeds the relevant guidelines for Aquatic ecosystems - Freshwater Ecological guideline 99% species protection (PFOS 0.00023 µg/L).

· Technical advice also suggests that there are sufficient grounds to require the site to cease the release of all product and the acceptance of any further liquid wastes until it is proven to be below the NEMP residential threshold for PFAS contamination. If the issue is found to be systemic, it has also been suggested that product recall may be an option.

POTENTIAL IMPACTS / RISKS:

· Based on the department's technical analysis of the latest results, the material has been shown to be extremely leachable.

· PFAS are persistent and highly resistant to physical, chemical and biological degradation.

CUSTOMER ACTIONS:

· On 9 February 2018 the holder of the Environmental Authority was alerted to the issue and advised that material should not be allowed to leave the site.

· The owner of the site has indicated that he has also engaged his own scientific consultant to undertake further sampling.

· The owner of the site has also expressed concerns about the findings to date and is keen to work with the department to promptly determine the extent of the issue and resolve it.

DEPARTMENT ACTIONS:

· On 12 February 2018, the department issued a Direction Notice to WMI to prevent the movement of any compost material from the site until further sampling and analysis can be undertaken to determine the extent of the issue.

· In addition to the Direction Notice, it is intended to require WMI to undertake an Environmental Evaluation (EE) to determine the extent of any contamination, which will seek to include further product sampling, site and surrounds sampling, and feedstock sampling.

· The department has provided WMI with a copy of the draft EE to accord with Natural Justice requirements, with any response from WMI required by 5 March 2018.

· A media holding statement has previously been prepared on this matter, but will need to be updated to reflect the current status.

LOCALITY DETAILS AND PHOTOGRAPHS:

· Cumner Road, Swanbank, QLD.

KEY COMMUNICATION MESSAGES:

- PFAS is a significant concern to the department and community and prompt action is therefore required to address the matter.
- Significant media interest may result from the department's enforcement actions.
- The Direction Notice restricting the movement of compost product from the WMI site for an extended period and an EE that requires detailed sampling and analysis of the site and surrounds s 78B(2)
- The department's technical support officer for the matter has indicated that the timeframes to thoroughly conduct and finalise all sampling and analysis at the site through an EE may take anywhere between 3 to 6 months.

CONTACT DETAILS:

- Name: Reuben Carlos, Executive Director, EESWQC / Andrew Connor, Executive Director, IDSQC
- Phone number: (07) 3330 5539 / (07) 3330 6335
- Division: Environmental Services and Regulation

This email is an initial alert in respect of this matter.

If further advice or action is required, it will be communicated via normal channels such as a briefing note.

END

Scott Blanchard

Compliance Delivery Manager

South West Queensland Compliance I Ipswich

Environmental Services and Regulation

Department of Environment and Science

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PO Box 875 Ipswich Qld 4305

<<https://www.getinvolved.qld.gov.au/gi/consultation/4456/view.html>>

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From: HARBERT Kate [Kate.Harbert@des.qld.gov.au]

Sent: Friday, 13 April 2018 9:54 AM

To: SUMMERVILLE Sinead

Subject: FW: ESR Alert - Environmental Evaluation issued to Wood Mulching Industries 12 April 2018 - PFAS in Final Product Compost

Follow Up Flag: Follow up

Flag Status: Completed

Hello Sinead,

FYI – Alert has gone out. Andrew asked me to take out the historical information and just make it an enforcement alert.

Thanks for your assistance.

Kind regards,

Kate

From: CONNOR Andrew

Sent: Friday, 13 April 2018 9:10 AM

To: ESR <ESR@des.qld.gov.au>

Cc: ELLWOOD Dean <Dean.Ellwood@des.qld.gov.au>; LOWE Trinity <Trinity.Lowe@des.qld.gov.au>; Corro DES ESR IaDaSQC <DESESRIaDaSQC.Corro@des.qld.gov.au>; Corro DES ESR EESWQC <DESESREESWQC.Corro@des.qld.gov.au>; HERTSLET Bryce <Bryce.Hertslet@des.qld.gov.au>; HILL Chris <Chris.Hill@des.qld.gov.au>; BRAIN Tim (DES) <Tim.Brain@des.qld.gov.au>; HARBERT Kate <Kate.Harbert@des.qld.gov.au>; BLANCHARD Scott <Scott.Blanchard@des.qld.gov.au>

Subject: ESR Alert - Environmental Evaluation issued to Wood Mulching Industries 12 April 2018 - PFAS in Final Product Compost

ALERT CATEGORY:

- Enforcement activity.

ALERT NAME:

- Wood Mulching Industries: PFAS in Final Product Compost.

CUSTOMER DETAILS:

- Wood Mulching Industries Pty Ltd (WMI).
- Cumner Road, Swanbank QLD.

SUMMARY OF ISSUE/S:

- On 12 April 2018 an Environmental Evaluation Notice was issued to WMI which requires an investigation of the source of the PFAS contamination, the nature and extent of contamination and potential environmental harm as a result of the receipt of PFAS waste, clean up options and measures and a report to the department by 7 September 2018. This is further to previous enforcement action following detection of PFAS in compost product at WMI.
- In December 2017, the Department of Environment and Science (the department) undertook a 'Compost Final Product Sampling Program' at six commercial composters in South East Queensland.
- Sample results indicated that WMI had levels of PFAS present in compost that are cause for significant concern. The sum of PFOS and PFHxS (standard suite) were at a maximum of 0.299 mg/kg which is 33 times the relevant residential PFAS National Environmental Management Plan (NEMP) level of 0.009 mg/kg for soil.
- On 13 February 2018, departmental officers attended WMI's site and undertook additional sampling of both compost windrows and adjacent on-site ponds to further investigate the extent of PFAS issues at the site.
- The sampling results of the compost from the 13 February 2018 indicate that the sum of PFHxS and PFOS (TOP Assay) was between 0.0236 and 0.0308 mg/kg, still well above the residential criteria of 0.009 mg/kg for soil.
- The sampling results of the on-site ponds from the 13 February 2018 indicate that PFOS was at a maximum of 10.1 µg/L, which significantly exceeds the relevant guidelines for Aquatic ecosystems - Freshwater Ecological guideline 99% species protection (PFOS 0.00023 µg/L).

POTENTIAL IMPACTS / RISKS:

- Based on the department's technical analysis of the latest results, the material has been shown to be extremely leachable.
- PFAS are persistent and highly resistant to physical, chemical and biological degradation.

CUSTOMER ACTIONS:

- On 9 February 2018 the holder of the Environmental Authority was alerted to the issue and advised that material should not be allowed to leave the site.

DEPARTMENT ACTIONS:

- On 12 February 2018, the department issued a Direction Notice to WMI to prevent the movement of any compost material from the site until further sampling and analysis can be undertaken to determine the extent of the issue.
- On 26 February 2018, WMI made an application to the department to review the original decision to issue the Direction Notice on 12 February 2018.
- On 7 March 2018, the department sent a letter by express post to WMI regarding the analysis results of 13 December 2017 and 13 February 2018 and likelihood of final product sold and distributed from December 2017 to February 2018 was contaminated with PFAS and concerns about the risk to the community.
- On 12 March 2018, the department made a decision on the internal review application to vary the Direction Notice to correct an administrative error in the property description and to reflect additional information.
- On 12 April 2018 an Environmental Evaluation Notice was issued to WMI which requires an investigation of, the source of the PFAS contamination, the nature and extent of contamination and potential environmental harm as a result of the receipt of PFAS waste, clean up options and measures and a report to the department by 7 September 2018

LOCALITY DETAILS AND PHOTOGRAPHS:

- Cumner Road, Swanbank, QLD.

KEY COMMUNICATION MESSAGES:

- PFAS is a significant concern to the department and community and prompt action is therefore required to address the matter.
- Significant media interest may result from the department’s enforcement actions.
- The Direction Notice restricting the movement of compost product from the WMI site for an extended period and an EE that requires detailed sampling and analysis of the site and surrounds

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- The department’s technical support officer for the matter has indicated that the timeframes to thoroughly conduct and finalise all sampling and analysis at the site through an EE may take anywhere between 3 to 6 months.

CONTACT DETAILS:

- Name: Reuben Carlos, Executive Director, EESWQC / Andrew Connor, Executive Director, IDSQC
- Phone number: (07) 3330 5539 / (07) 3330 6335
- Division: Environmental Services and Regulation

This email is an alert in respect of this matter.

If further advice or action is required, it will be communicated via normal channels such as a briefing note.

END

From: BLANCHARD Scott [Scott.Blanchard@des.qld.gov.au]
Sent: Friday, 29 June 2018 1:55 PM
To: BUCHANAN Alison
CC: RICE John
Subject: FW: Updated ESR Alert - Wood Mulching Industries - PFAS in Final Product Compost
Attachments: Updated ESR Alert - Wood Mulching Industries - PFAS in Final Product Compost.jpg



Scott Blanchard

Compliance Delivery Manager

South West Queensland Compliance | Ipswich

Environmental Services and Regulation

Department of Environment and Heritage Protection

Ph (07) 3894 8152

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PO Box 875 Ipswich Qld 4305



...make the move



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From: Corro DES ESR EESWQC
Sent: Monday, 11 June 2018 11:00 AM
To: ESR <ESR@des.qld.gov.au>
Cc: Corro DES ESR EESWQC <DESESREESWQC.Corro@des.qld.gov.au>; CAMBOURN Neil <Neil.Cambourn@des.qld.gov.au>; CONNOR Andrew <Andrew.Connor@des.qld.gov.au>; HILL Chris <Chris.Hill@des.qld.gov.au>; BLANCHARD Scott <Scott.Blanchard@des.qld.gov.au>; LOWE Trinity <Trinity.Lowe@des.qld.gov.au>
Subject: Updated ESR Alert - Wood Mulching Industries - PFAS in Final Product Compost

ALERT CATEGORY:

- Enforcement activity.

ALERT NAME:

- Wood Mulching Industries: PFAS in Final Product Compost.

CUSTOMER DETAILS:

- Wood Mulching Industries Pty Ltd (WMI).
- Cumner Road, Swanbank QLD.

SUMMARY OF ISSUE/S:

- In December 2017, the Department of Environment and Science (the department) undertook a 'Compost Final Product Sampling Program' at six commercial composters in South East Queensland [including WMI on 13 December 2017](#).
- Sample results [from the 13 December 2017](#) indicated that WMI had levels of PFAS present in compost that are cause for significant concern. The sum of PFOS and PFHxS (standard suite) were at a maximum of 0.299 mg/kg which is 33 times the relevant residential PFAS National Environmental Management Plan (NEMP)

level of 0.009 mg/kg for soil.

- On 13 February 2018, departmental officers attended WMI's site and undertook additional sampling of both compost windrows and adjacent on-site ponds to further investigate the extent of PFAS issues at the site.
- The sampling results of the compost from the 13 February 2018 indicate that the sum of PFHxS and PFOS (TOP Assay) was between 0.0236 and 0.0308 mg/kg, still well above the residential criteria of 0.009 mg/kg for soil.
- The sampling results of the on-site ponds from the 13 February 2018 indicate that PFOS was at a maximum of 10.1 µg/L, which significantly exceeds the relevant guidelines for Aquatic ecosystems - Freshwater Ecological guideline 99% species protection (PFOS 0.00023 µg/L).
- On 12 April 2018, an Environmental Evaluation (EE) Notice was issued to WMI which requires an investigation of the source of the PFAS contamination, the nature and extent of contamination and potential environmental harm as a result of the receipt of PFAS waste, clean up options and measures and a report to the department by 7 September 2018. This is further to the [Direction Notice issued on 12 February 2018](#) following detection of PFAS in compost product at WMI.
- On 9 May 2018, following an application from WMI, the Planning and Environment (P&E) Court made an order to stay the EE Notice pending the outcome of the internal review decision and included the period to apply for an appeal. WMI also filed an application to appeal the Direction Notice, however, a court date is yet to be set. WMI has not sought a stay for the Direction Notice.
-

POTENTIAL IMPACTS / RISKS:

- Based on the department's technical analysis of the latest results, the material has been shown to be extremely leachable.
- PFAS are persistent and highly resistant to physical, chemical and biological degradation.

CUSTOMER ACTIONS:

- On 9 February 2018, [WMI](#) as the holder of the Environmental Authority was alerted to the issue and advised that material should not be allowed to leave the site.

DEPARTMENT ACTIONS:

- On 12 February 2018, the department issued a Direction Notice to WMI to prevent the movement of any compost material from the site until further sampling and analysis can be undertaken to determine the extent of the issue.
- On 26 February 2018, WMI made an application to the department to review the original decision to issue the Direction Notice on 12 February 2018.
- On 7 March 2018, the department sent a letter by express post to WMI regarding the analysis results of 13 December 2017 and 13 February 2018 and [raised the potential that](#) final product sold and distributed from December 2017 to February 2018 [may be](#) contaminated with PFAS and concerns about the risk to the community. [WMI were invited to advise what actions they intended to take to address these concerns.](#)
- On 12 March 2018, the department made a decision on the internal review application to vary the Direction Notice to correct an administrative error in the property description and to reflect additional information.
- On 12 April 2018 an EE Notice was issued to WMI which requires an investigation of, the source of the PFAS contamination, the nature and extent of contamination and potential environmental harm as a result of the receipt of PFAS waste, clean up options and measures and a report to the department by 7 September 2018.
- [On 26 April 2018, WMI applied for an internal review of the original decision to issue the Environmental Evaluation Notice. The review decision was to vary the EE with only minor modifications that do not materially alter the intent of the EE. WMI was notified in writing of this decision on 25 May 2018.](#)
- [On 4 May 2018, WMI replied to the department's letter dated 7 March 2018 advising that it would be inappropriate to provide a response on the grounds that the matter is sub judice given the pre-emptive actions taken by the department and the proceedings that have been instituted in the P&E Court.](#)
- [The department will be inspecting the WMI site again in June 2018, and following advice from the Litigation Unit, will be taking further samples of compost, soil and surface waters to further determine the extent of](#)

PFAS on the site.

- Based on additional advice from Litigation, the department will also make further enquiries with retail outlets that may have accepted compost product from WMI and potentially take compost samples from these outlets.

LOCALITY DETAILS AND PHOTOGRAPHS:

- Cumner Road, Swanbank, QLD.



KEY COMMUNICATION MESSAGES:

- PFAS is a significant concern to the department and community and prompt action is therefore required to address the matter.
- Significant media interest may result from the department's enforcement actions.
- The Direction Notice restricting the movement of compost product from the WMI site for an extended period and an EE that requires detailed sampling and analysis of the site and surrounds

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s 78B(2)

- The department's technical support officer for the matter has indicated that the timeframes to thoroughly conduct and finalise all sampling and analysis at the site through an EE may take anywhere between 3 to 6 months.

CONTACT DETAILS:

- Name: Neil Cambourn, A/Executive Director, EESWQC / Andrew Connor, Executive Director, IDSQC
- Phone number: (07) 3199 7518 / (07) 3330 6335
- Division: Environmental Services and Regulation

This email is an alert in respect of this matter.

If further advice or action is required, it will be communicated via normal channels such as a briefing note.

END

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Wood Mulching
Industries

Centenary Hwy

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From: MARKS Zhivana **On Behalf Of** ESR

Sent: Friday, 13 April 2018 9:37 AM

To: MERRICK Jamie; TRACEY Alena; Daniel Lato; Pamela Frost; Hannah Jackson; Angus Sutherland; DLO DES; Media DES

Cc: ELLWOOD Dean; LOWE Trinity; ESR

Subject: ESR Alert - Environmental Evaluation issued to Wood Mulching Industries 12 April 2018 - PFAS in Final Product Compost

ALERT CATEGORY:

- Enforcement activity.

ALERT NAME:

- Wood Mulching Industries: PFAS in Final Product Compost.

CUSTOMER DETAILS:

- Wood Mulching Industries Pty Ltd (WMI).
- Cumner Road, Swanbank QLD.

SUMMARY OF ISSUE/S:

- On 12 April 2018 an Environmental Evaluation Notice was issued to WMI which requires an investigation of the source of the PFAS contamination, the nature and extent of contamination and potential environmental harm as a result of the receipt of PFAS waste, clean up options and measures and a report to the department by 7 September 2018. This is further to previous enforcement action following detection of PFAS in compost product at WMI.
- In December 2017, the Department of Environment and Science (the department) undertook a 'Compost Final Product Sampling Program' at six commercial composters in South East Queensland.
- Sample results indicated that WMI had levels of PFAS present in compost that are cause for significant concern. The sum of PFOS and PFHxS (standard suite) were at a maximum of 0.299 mg/kg which is 33 times

- the relevant residential PFAS National Environmental Management Plan (NEMP) level of 0.009 mg/kg for soil.
- On 13 February 2018, departmental officers attended WMI's site and undertook additional sampling of both compost windrows and adjacent on-site ponds to further investigate the extent of PFAS issues at the site.
- The sampling results of the compost from the 13 February 2018 indicate that the sum of PFHxS and PFOS (TOP Assay) was between 0.0236 and 0.0308 mg/kg, still well above the residential criteria of 0.009 mg/kg for soil.
- The sampling results of the on-site ponds from the 13 February 2018 indicate that PFOS was at a maximum of 10.1 µg/L, which significantly exceeds the relevant guidelines for Aquatic ecosystems - Freshwater Ecological guideline 99% species protection (PFOS 0.00023 µg/L).

POTENTIAL IMPACTS / RISKS:

- Based on the department's technical analysis of the latest results, the material has been shown to be extremely leachable.
- PFAS are persistent and highly resistant to physical, chemical and biological degradation.

CUSTOMER ACTIONS:

- On 9 February 2018 the holder of the Environmental Authority was alerted to the issue and advised that material should not be allowed to leave the site.

DEPARTMENT ACTIONS:

- On 12 February 2018, the department issued a Direction Notice to WMI to prevent the movement of any compost material from the site until further sampling and analysis can be undertaken to determine the extent of the issue.
- On 26 February 2018, WMI made an application to the department to review the original decision to issue the Direction Notice on 12 February 2018.
- On 7 March 2018, the department sent a letter by express post to WMI regarding the analysis results of 13 December 2017 and 13 February 2018 and likelihood of final product sold and distributed from December 2017 to February 2018 was contaminated with PFAS and concerns about the risk to the community.
- On 12 March 2018, the department made a decision on the internal review application to vary the Direction Notice to correct an administrative error in the property description and to reflect additional information.
- On 12 April 2018 an Environmental Evaluation Notice was issued to WMI which requires an investigation of, the source of the PFAS contamination, the nature and extent of contamination and potential environmental harm as a result of the receipt of PFAS waste, clean up options and measures and a report to the department by 7 September 2018

LOCALITY DETAILS AND PHOTOGRAPHS:

- Cumner Road, Swanbank, QLD.

KEY COMMUNICATION MESSAGES:

- PFAS is a significant concern to the department and community and prompt action is therefore required to address the matter.
 - Significant media interest may result from the department's enforcement actions.
 - The Direction Notice restricting the movement of compost product from the WMI site for an extended period and an EE that requires detailed sampling and analysis of the site and surrounds
- s 78B(2)
- s 78B(2)
- The department's technical support officer for the matter has indicated that the timeframes to thoroughly conduct and finalise all sampling and analysis at the site through an EE may take anywhere between 3 to 6 months.

CONTACT DETAILS:

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- Phone number: (07) 3330 5539 / (07) 3330 6335
- Division: Environmental Services and Regulation

This email is an alert in respect of this matter.

If further advice or action is required, it will be communicated via normal channels such as a briefing note.

END

Zhivana Marks

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