

## Hanna, Nicole MS

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**From:** Blain, Helen MS  
**Sent:** Saturday, 12 September 2015 4:21 PM  
**To:** Jones, Rachel CMDR 3  
**Subject:** FW: Helen Horn meeting with EPA on 10 May 2012 [SEC=UNCLASSIFIED]  
**Attachments:** For Information: Back brief on visit to NSW EPA and HWC re PFOS/PFOA contamination [SEC=UNCLASSIFIED]

UNCLASSIFIED

Helen Blain  
Acting Assistant Secretary  
Environment and Engineering Branch

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**From:** Blain, Helen MS  
**Sent:** Saturday, 12 September 2015 16:19  
**To:** Pearce, Vicki MISS 1  
**Cc:** Divall, Gregory MR  
**Subject:** Helen Horn meeting with EPA on 10 May 2012 [SEC=UNCLASSIFIED]

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Vicki, as requested

Here is the detailed email from Helen. The contention I suspect is about the notion of surface water exiting the base compared with well measurements taken off base.

best wishes helen

Helen Blain  
Acting Assistant Secretary  
Environment and Engineering Branch

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**From:** Horn, Helen MRS  
**Sent:** Thursday, 10 September 2015 11:10  
**To:** Blain, Helen MS  
**Cc:** Holmes, Mark BRIG  
**Subject:** RE: latest time line and draft media statement [SEC=UNCLASSIFIED]

11/10/2016

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Thanks for the feedback Helen. I am continuing to have a look in our records to make sure the facts are correct.

Attached is a copy of my back brief from the 10 May 2012 Meeting with NSW EPA and Hunter Water (separate meetings). At that meeting we confirmed PFOS and PFOA in ground water and surface water. The drains that leave the RAAF Base are all open unlined drains and always have water in them which means the groundwater comes to the surface in this drains so any detection of contaminants in the surface water would mean that the groundwater is contaminated as well. We also knew that the groundwater on the RAAF Base was/is contaminated and therefore given the location of the hotspots and the time since elapsed since the 3M product was used that it was a reasonable assumption that there would be widespread contamination of groundwater leaving the Base. At the time we were also aware of the investigations being undertaken at the Sewage Effluent lagoon as part the Stage 2 Redevelopment planning the main lagoon is technically off Commonwealth land but utilised under an easement arrangement. The results from that investigation which was in progress at the time of the EPA meeting showed that the groundwater wells on the boundary of the easement showed elevated levels of PFOS/PFOA. It confirmed what we suspected would be the case. The only thing we didn't know was how far in the groundwater had it migrated and to what extent. We were honest and transparent with NSW EPA and Hunter Water. Note also that Hunter Water receives has received all our groundwater monitoring reports since the early 2000's and we work closely with them to ensure they understand the contamination status of the Base so they can make informed judgements on managing the risks around the extraction of raw water from the aquifer.

22



Hope that adds to the picture.

Regards,

*Helen Horn*

Assistant Director Regional Risk & Safety (till Dec 15)  
Defence Support Operations  
Northern NSW Region

BLDG 163, RAAF Base Williamtown  
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Mobile: 22

11/10/2016

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**From:** Blain, Helen MS  
**Sent:** Wednesday, 9 September 2015 19:27  
**To:** Holmes, Mark BRIG; Horn, Helen MRS  
**Subject:** latest time line and draft media statement [SEC=UNCLASSIFIED]

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Helen grateful for your review

the purpose of the time line is to have an agreed view of events that can inform media and briefings. It becomes the anchor for all in Defence to use in preparing documents. I'm not including all the specific details from your time line but looking for it to absolutely align with your same entries.

I am keen to understand whether in 2012 we had confirmed data indicating groundwater was contaminated off base and whether we told the EPA.

The minsub of the time refers only to surface water?

Also keen to know your views on the statement that at Williamstown RAAF ceased using AFFF in training activities in 2004.

Many thanks helen

**Helen Blain**  
**Acting Assistant Secretary**  
**Environment and Engineering Branch**

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## Hanna, Nicole MS

**From:** Horn, Helen MRS  
**Sent:** Monday, 14 May 2012 9:55 AM  
**To:** Shields, Kathryn MS; Trinder, Colin MR; Mangion, Charles MR; Heiman, Scott MR 2; Pearce, Vicki MS 1; Tilley, Ron GPCAPT; Bauer, Mark MR; 'alice.chen'<sup>22</sup>; 'Tony.Hill'<sup>22</sup>  
**Cc:** McKone, Daryle MR; Sampaklis, Andrew MR; Picot, Ross MR  
**Subject:** For Information: Back brief on visit to NSW EPA and HWC re PFOS/PFOA contamination [SEC=UNCLASSIFIED]

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Dear all,

On Thurs 10th May Daryle McKone, Andrew Sampaklis and myself visited NSW EPA and Hunter Water Corp to brief them on the recent discovery of PFOS and PFOA in the stormwater and groundwater at RAAF Base WLM. To aid in discussions we took a map of the groundwater well network at the Base (including the STP) overlaid with the screening results for PFOS for the samples taken in March.

### We briefed both Hunter Water and the EPA on the,

- current situation in relation to PFOS and PFOA exceeding the adopted Minnesota Department of Health guideline trigger values within ground water and surface water on site and leaving the site.
- Historical use of AFFF onsite, including the PFOS containing product,
- the replacement product and its controlled use, and
- our way forward, following a NEPM process for phased investigations, including fate and transport modelling and risk to sensitive receptors inclusive of human health risks.
- discussed with the EPA the legislated reporting requirements.

### Hunter Water Corporation comments included:

- concerns regarding public perception and the need for a communications plan (HWC mindful of recent media questions around the operation of the STP);
- concerns about human health risk associated with PFOS/PFOA from contaminated water entering the network;
- sterilisation of the water bores within the vicinity of the base, which would impact on their ability to sustain water resources during peak demand times (Summer), drought and water quality issues associated with surface water resources;
- acceptance of our NEPM process approach for further investigation and commitment to include them as a stakeholder;
- concerned about the ongoing risk from existing use of AFFF and noted that they will need to reassess their risk assessments and strategic water plans;
- recommended the creation of a consultative stakeholder group and the inclusion of NSW Office of Water (as the aquifer water quality regulator) as a stakeholder.
- Hunter Water gave Defence permission to access their bores to undertake further sampling. We agreed to supply the results of testing from these bores to allow Hunter Water to undertake modelling, and
- they were appreciative of us providing them with a brief

### EPA comments included:

- they have no jurisdiction at RAAF Williamstown and for the purposes of notification of pollution incidents under Part 5.7 of the POEO Act the Council is the appropriate regulatory authority, however they agreed that this is an historical legacy issue and not the result of an identified incident;
- Tilligerry Creek and the Oyster Farmers downstream are sensitive receptors and a potential issue should sampling show contamination has migrated some distance;

- at this stage there was no need to report under S 60 of the CLM Act pending further investigations;
- EPA Contaminated Lands Section will review what they know about PFOS/PFOA and provide advice in relation to trigger values;
- they were grateful to Defence for providing the brief;
- EPA recommended the inclusion of NSW Office of Water and Department of Primary Industries - Fisheries NSW as stakeholders, and
- EPA supported the creation of consultative stakeholder group.

**The next steps for us are:**

- Mobilise consultants as soon as possible to commence further sampling and staged investigations
- Draft a communications strategy
- Contact Port Stephens Council and National Parks to access their respective properties to conduct further sampling along the stormwater drains. Brief both parties at the same time
- Update SADFO on issue
- Continue to implement communications strategy

Ron Tilley/Mark Bauer, we will need to work with you on the comms strategy once AECOM finish their STG 2 investigations and when you will provide the report to Mr Garvey. Let me know if you want to teleconference with Ashurst re implications at STP.

Charles, can you forward this brief to SADFO and Jacqui Payne.

Colin and team, we will keep in contact during the conduct of the investigations.

Let me know if you require further information.

Regards,

*Helen Horn*

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Defence Support Operations  
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## Hanna, Nicole MS

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**From:** Sampaklis, Andrew MR  
**Sent:** Friday, 29 June 2012 9:23 AM  
**To:** Horn, Helen MRS; Mangion, Charles MR; McKone, Daryle MR; Shields, Ainslie MRS; Johnson, Glen WGCDR  
**Subject:** Update on AFFF contam at WLM [SEC=UNCLASSIFIED]  
**Attachments:** Updated Brief - PFOS-PFOA Contam 25062012.doc  
**UNCLASSIFIED**

Hi All

Helen and I will be having an informal catch up with the EPA today (they are here for the JSF consultation) to give them a status update on our AFFF investigation process. I have prepared a brief ahead of this meeting and have attached it FYI.

Please note that it has not been reviewed or cleared through the DSG chain and its purpose is to simply aid our discussions with the EPA today. I also do not (and at this stage cannot) provide any interpretation of the results discussed within the brief as we have an incomplete picture.

Cheers  
Andrew

Andrew Sampaklis  
Regional Environment Officer

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***BACKGROUND INFORMATION – Detection of  
Contaminant in ground and surface water at RAAF Base  
Williamtown – Update June 28<sup>th</sup> 2012***

1. On the 10 May 2012 Defence personnel met with the New South Wales Environment Protection Authority (NSW EPA) and Hunter Water Corporation (HWC). Similar discussions were held with Port Stephens Council on 31<sup>st</sup> May 2012.
2. The discussions were held to ensure Defence's actions and response to the AFFF contamination were appropriate, met the Department's duty of care obligations and that there was early identification of the risk to human health and the environment. Consultation with NSW EPA, HWC and other stakeholders will continue during the investigation stage.
3. During these discussions, Defence advised all agencies of its intent to undertake formal National Environment Protection Measures (NEPM) Stage 1 and Stage 2 Investigations. The NEPM framework provides a nationally-recognised guideline for the assessment, management and remediation of contaminated sites.
4. Defence has engaged an independent consultant to undertake the formal Stage 1 and Stage 2 investigations. Initial sampling (in addition to Stage 1) was conducted at high risk receptors neighbouring the base, namely HWC groundwater borefields and surface water locations downstream of the base. Initial sampling was conducted in the week beginning 10 June 2012. The formal Stage 1 investigation commenced in the week beginning 18 June 2012.
5. Hunter Water Corporation and Port Stephens Council were consulted extensively prior to selecting the initial sampling sites and both agencies endorsed the initial sampling program on their respective properties. Preliminary results from initial sampling were provided to Defence on 25 June 2012. Note that the results summarised at points 6 and 7 are not finalised from the laboratory.
6. The Moore's Drain stormwater network discharges into Tilligerry Creek. At the stormwater discharge point off the Base, slightly elevated levels of PFOS were detected (three times guideline level of 0.3ug/L) during initial sampling prior to Stage 1 investigations. PFOS was detected as far away as Richardson Road at Salt Ash (less than the guideline value of 0.3ug/L). A site to the south of the offsite discharge point had nil PFOS and there is one sampling point from which results are pending.
7. The Dawson's Drain stormwater network discharges into Fullerton Cove. Elevated PFOS was found at three from four offsite sampling points; these points are approximately 1km from the Base boundary. The levels at site "DD3" were thirty times the guideline value and actually exceed the concentrations at the offsite stormwater discharge point of the Base.
8. Groundwater results are not yet back from the laboratory. The results are expected in the next week or two.

9. Additional, intrusive sampling will occur in the future as part of Stage 2 investigations but the exact requirements and details are dependent on the outcomes of the Stage 1 investigation. The Stage 2 sampling regime and methodologies will be detailed in a Sampling and Analysis Plan, which will be reviewed by key stakeholders.
10. In order to maintain transparency and ensure the robustness of the Stage 1 and Stage 2 investigations, Defence will engage an independent Technical Advisor to review and oversee the work being carried out by the consultant. A tender process is currently being undertaken. It should be noted that the consultant and the technical advisor will not be from the same organisation.