



21 April 2020

Environmental Protection Agency
engage.epa@sa.gov.au

Dear EPA

RE: Southern Waste Resource Co Licence PFAS Application, Tatachilla Rd McLaren Vale

The Friends of Willunga Basin Inc (FOWB) Management Committee met last Tuesday 14 April 2020 to discuss the EPA's call for submissions on the above matter, as contained in the document "*LANDFILL LICENCE SWR McLaren Vale community information*".

In principle, FOWB is opposed to this application, it being on a site which is within the boundaries of the McLaren Vale Character Preservation District. Our opposition arises because the toxicity, long life, potential bioaccumulation and health risks, and possible environmental damage arising from storage of these PFAS contaminants are completely incompatible with a premier agricultural area. We regard PFAs as the 'new asbestos'.

Even with the imposition of exemplary monitoring conditions, the current application gives rise significant risk of reputational damage to the McLaren Vale District's 'clean and green' food & wine branding. We believe that such damage would have long term adverse effects and ramifications. In our view, the mere possibility renders the proposal completely unacceptable.

The disposal and storage would be far better suited to a remote location and vastly preferable to a peri-urban site lying within sight of both residential and intensive agricultural land uses. This is all the more so given that the waste to be stored is generated from beyond the City of Onkaparinga.

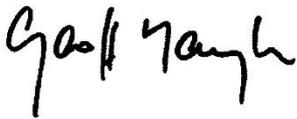
Committee raised the following specific concerns:

- the information provided in the EPA's community information contains no scientific information about the health and environmental effects of exposure to PFAS contaminated material. We have included reference links to articles researched by FOWB at the end of this submission. These include information that is of concern to FOWB and we ask the EPA to address these risks and then to provide further information about them to the community.
- it is not clear if the applicant is intending to mix PFAS contaminated waste with other contaminated waste already disposed at the landfill. There is currently no science around how these contaminants will react/behaviour when mixed together. There is concern about the effectiveness of the lining system proposed and what science has been used in its design.
- we understand that an area of 6,000 sq m has been allocated for the disposal of these contaminants but there is no information about the volume proposed. We consider that a volume should be specified as well, including limits on the overall volume to be stored, and that there needs to be science around calculating this volume limit.
- there is no information about how the applicant would deal with a leak if such an occurrence happened at the site, or how it would undertake to treat contaminated waterways or aquifers, or demonstrate if they can be remediated effectively;
- one of our members has referred to Jeff Oliver's geological map of the district, which indicates that the main Ochre Cove - Clarendon fault appears to be within about 2 kms of the site, while another parallel fault appears to be running in alignment with the site;

- there is further concern that the proposed disposal site connects directly to the Maslin Sands aquifer, which is a major source of Willunga Basin irrigation water.

FOWB also believes that, in the light of the COVID 19 pandemic, the EPA should extend the community engagement period to allow community face-to-face meetings after the pandemic ends. We trust that FOWB's concerns will be given due consideration by the EPA as it considers this opportunistic and inappropriate application.

Yours Sincerely



Geoff Hayter
Chairperson

References:

1. CNN Health **What are PFAS chemicals, and what are they doing to our health? By Nadia Kounang, CNN Updated 0858 GMT (1658 HKT) February 14, 2019**

<https://edition.cnn.com/2019/02/14/health/what-are-pfas-chemicals/index.html>

2. ABC News - Erin Brockovich sounds alarm over PFAS contamination after more Queensland sites revealed

<https://www.abc.net.au/news/2019-10-21/erin-brockovich-sounds-alarm-over-pfas-as-new-qld-sites-emerge/11606772>

3. Wikipedia

https://en.wikipedia.org/wiki/Per-_and_polyfluoroalkyl_substances

4. [ABC News](#)

<https://www.abc.net.au/news/2019-10-29/erin-brockovich-australia-class-action-pfas-contamination/11645312>