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Gus Gonzo
Department of Environment and Science
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Cairns, QLD 4002

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2nd August 2019

Dear Gus,

Response to Notice requesting further information – STAT1304

I am writing in response to the Notice requesting further information received 15 May 2019 (the Notice) following RTA Weipa's (RTAW) submission of the Detailed Site Investigation (DSI) report. The DSI was submitted in accordance with the Environmental Evaluation (EE) issued to on 7 September 2018. The EE was issued subsequent to consultation between the Department of Environment and Science (DES) and RTAW.

The Notice included a requirement for further information on 5 items. A response has been prepared to each of these requirements. Requirements 1-3 are addressed in the attached report prepared by AECOM and responses to requirements 4-5 are provided below.

RTAW would appreciate the opportunity to meet with DES in Cairns to discuss the company's position on these matters and reach an agreement on the requirements of the Notice. It would be appreciated if DES can contact RTAW to arrange a suitable date and time following the consideration of this response.

4. The Napranum water supply is to be included in the ongoing sampling program considered in ongoing management measures.

In its letter dated 20 December 2018, DES requested sampling of the Napranum groundwater bores to investigate if there is a source-pathway-receptor link. RTAW responded to this matter on 25 January 2019 and an extract of the letter is provided below.

"Testing of the Napranum community groundwater bores was completed in November 2017 by the Queensland Government Forensic and Scientific Services. A laboratory certificate of testing dated 21 November 2017 included test results for 4 samples inferred to represent 3 potable water abstraction wells and an accumulation point at Napranum. The certificate of analysis indicated a detectable concentration of PFOS in one sample with all other results below the laboratory limit of reporting and all results below human health guideline values for drinking water (PFAS National Environmental Management Plan 2018). The sampling methods and locations were not included in the test certificate."

"It should be noted that RTAW does not have authority to commence investigations or sampling within the area of the Napranum Shire Council. Irrespective of this, RTAW reviewed the provided results as part of the PSI and did not consider further investigation by RTAW to be warranted. The PSI identified high risk primary source areas, which did not include Napranum. The DSI now being undertaken will focus on these known areas in greater detail."

In addition, during a meeting on 21 January 2019 at the DES office in Cairns it was agreed that further sampling was not warranted by RTAW within the Napranum community. Following submission of the above letter DES did not request any further information or raise any additional concerns. RTAW repeats and reiterates it's the submission as extracted above in response to the Notice.

5. Include information on the active engagement undertaken with the Napranum community in accordance with the principles for effective engagement within the NEMP.

From the outset, RTAW has worked closely with DES on the PFAS investigation and management of the project. During this time, community notification has been discussed on various occasions with DES and based on the level of risk it was agreed that public notification was not warranted nor encouraged. It is understood that the results of sampling undertaken by QLD Health in the Napranum groundwater was communicated to the Napranum community by QLD Health. Therefore, it is understood that the community are aware of the PFAS detection.

Although no proactive notification or engagement relating specifically to the PFAS detection has been undertaken, RTAW are active in the local community in a number of ways including:

- Quarterly formal Agreements meetings of which Napranum community and Napranum Aboriginal Shire Council are members
- Regular engagement within the surrounding communities including Napranum
- RT Weipa business updates to Napranum Aboriginal Shire Council at least once a year and further as requested
- Quarterly open community forums in Weipa
- Community hotline: number 1800 707 133
- Central located community building in Weipa for community members to visit with any enquiries

RTAW believe that the above methods of ongoing active engagement provide the surrounding communities with ample opportunity to express any concerns that they may have regarding PFAS.

Should you have any questions or concerns please feel free to contact Shalika Walker on 0484 584 746 or myself.

We look forward to discussing the discussing RTAW's position on these matters further.

Regards,

Vince Lavery
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