DOC25/250255

Ms Fiona Smith
Executive Manager, Strategy and Performance
Water NSW
PO Box 398
PARRAMATTA NSW 2124

28 March 2025

Dear Ms Smith

I refer to you requests for the NSW PFAS Technial Advisory Group (TAG) to review the preliminary catchment assessment for Lake Medlow and Lake Greaves prepared by Jacobs (the Report).

The Environment Protection Authority (EPA) welcomes and supports agencies, such as WaterNSW, to investigate and manage the presence of PFAS in the environment to ensure potential PFAS exposure pathways to the community are identified and minimised. The EPA also with other agencies to supports landowners to provide accurate and timely information to the community on how to minimise potential exposure to PFAS.

The EPA understands that PFAS was detected in raw, untreated surface water within the Lake Medlow, Lake Greaves, and Cascade Dam that supplies the Cascade Water Filtration Plant. The EPA notes that Sydney Water has treating raw water using granular activated carbon and ion exchange resin to remove PFAS at the Cascade Water Filtration Plant since January 2025. Testing of treated water, which is supplied to the community, identified that PFAS levels remain below the national drinking water guidelines.

The Technical Advisory Group (TAG) has reviewed the investigation report: "*WaterNSW | Lake Medlow and Lake Greaves, Blue Mountains | Catchment Assessment 31 January 2025"* (the Report). The TAG would like to provide the following comments:

- The Report identifies three potential sources of PFAS contamination, being the Rural Fire Service (RFS) Medlow Bath Brigade Station and two traffic incident sites which occurred in 1992 and 2002. The EPA has reviewed the results in the Report and does concur the results indicate these sources do contribute to PFAS detections within that part of the catchment. However, the EPA does note PFAS detections at various concentrations throughout the catchment, indicating that PFAS is ubiquitous in the environment.
- In relation to the RFS Medlow Bath Brigade Station, this site is being investigated by the RFS as part of their PFAS Investigation Program. A Preliminary Site Investigation (PSI) has been undertaken, which has identified PFAS contamination in onsite soils. Initial sampling by the RFS did not detect PFAS above the laboratory limit of reporting (LOR) in Adams Creek directly downgradient of the site. However, the EPA has requested the RFS conduct additional investigations to understand any temporal variations, and to determine if any remediation is required at the site to reduce any potential contributions of PFAS to the

surrounding environment. The EPA will ask RFS to share this additional information with Water NSW.

Water

- It is noted that PFAS has been detected in Adams Creek, Lake Medlow, and Lake Greaves. The highest concentrations were recorded in Adam Creek (at ADM8 and ADM5) suggesting Medlow Bath RFS as a source.
- We note that the PFOS and PFHxS were the dominant PFAS chemicals which is consistent with legacy firefighting foams (e.g., 3M Light Water).
- PFAS levels were highest in upper Adams Creek catchment (closer to the potential sources), decreasing downstream, aligning with expected dilution.
- We note that all water samples exceeded the PFAS NEMP ecological freshwater guideline (99% species protection, 0.00023 µg/L), including the Lake Greaves overflow.
- All water for PFAS concentrations were below the current NHMRC recreational guidelines (as outlined in National Environment Management Plan 3.0).

Sediment

- We note that PFAS detections in Adams Creek (ADM5 and ADM15) support the sources may have been in Adams Creek catchment (Medlow Bath RFS site and past motor vehicle incidents).
- Contaminated sediments act as secondary sources, releasing PFAS into water over time.

Consistent with the National Environment Protection Measure 1999 (Assessment of Site Contamination (ASC), the EPA recommends that Water NSW undertakes a detailed site investigation to further refine the potential sources to help inform potential management actions.

In relation to the traffic incidents occurring in 1992 and 2002, the EPA does not have additional information to provide in relation to these incidents.

The EPA strongly encourage the sharing of information between WaterNSW, RFS and Fire & Rescue NSW. Shared information will help provide a better understanding of conditions across the catchment.

The EPA looks forward to continuing a productive relationship with WaterNSW to ensure the timely provision of comprehensive information to the surrounding communities on minimise their potential exposure to PFAS.

If you have any further questions about this issue, please contact hesitate to call me on [redacted]

Yours sincerely

STEVE BEAMAN PSM
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Environment Protection Authority