Waste tracking obligations for PFAS in Queensland

Queensland has a number of facilities licenced to manage per- and poly-fluoroalkyl substances (PFAS), including its destruction.

Per- and poly-fluoroalkyl substances (PFAS) are of concern due to their persistence in the environment and bio-accumulative properties. This presents waste management challenges.

This fact sheet provides guidance on the requirements to track PFAS waste.

PFAS National Environmental Management Plan

The PFAS National Environmental Management Plan (2018) (PFAS NEMP) guides jurisdictions in implementing mechanisms for the regulation of PFAS, including transport, treatment and disposal, as well as providing guidance to business and industry on meeting environmental obligations and duties.

Transport requirements

In Queensland, regulated wastes containing PFAS are only to be moved by an appropriately licenced transporter and tracked under the waste tracking system using the code:

M270 - per- and poly-fluoroalkyl substances

The associated waste descriptions must include reference to the PFAS compounds present, sufficient to accurately reflect the nature of the waste.

Consistent with the PFAS NEMP, States and Territories will be transitioning to using the code M270 - PFAS contaminated materials. This has been implemented in Queensland from 4 February 2019 following amendments to the Environmental Protection Regulation 2008.

Interstate transport

Wastes containing PFAS should only be transported into Queensland where it can be demonstrated that it is the most appropriate management option available.

A person who intends to transport regulated wastes containing PFAS into Queensland from another State or Territory must apply to the department for a consignment authorisation. The application must be in the approved form and include all the necessary information required for the department to decide the application, including but not limited to:

- details of the sampling and analysis methodology used to characterise the waste
- copies of laboratory certificates of analysis for the waste
- evidence that the receiving facility is lawfully able to accept the waste having considered all physical and chemical characteristics (for example, a copy of the facility's licence conditions and/or a written acceptance letter by the facility stating that they can lawfully accept the material under their licence conditions).

Waste characterisation requirements

Regulated wastes produced from activities associated with the use of PFAS products are to be tested to appropriately classify the waste type, and determine waste management options and approved waste receiving facilities.

These activities, such as the use of firefighting foams, aviation industries, waste consolidation, and metal/chrome plating industries, are presented in Appendix B of the PFAS NEMP. Where various liquid wastes are being mixed at a facility, consideration must be given to the individual wastes being used and likely contaminants present.

When determining and reporting the presence of PFAS, the following sample analyses must be conducted:

- standard suite of PFAS including sulfonates PFBS, PFHxS, PFOS and PFDCs, and
- total oxidisable precursor assay reported as the analyses for the resulting perfluorinated carboxylates for C4 to C14 carbon chain length (TOPA C4-C14).

The sum of the oxidisable precursors (TOPA C4-C14) plus perfluoroalkyl sulfonates (PFBS, PFHxS, PFOS, PFOSA, PFDCs) can be taken as a surrogate for the total fluorinated organics (C4-C14) if a total organic fluorine analysis is not available.

Further questions?

If you have any further questions please contact the departments Waste Tracking team at Waste.Track@des.qld.gov.au or by calling 13 QGOV (13 74 68).