



Department of Primary Industries

OUT15/35229

Ms Kate Masters
Industry and Infrastructure Projects
NSW Department of Planning and Environment
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SYDNEY NSW 2001

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Dear Ms Masters,

Erskine Park Resource Management Facility [SSD_7075] Response to exhibition of Environmental Impact Statement

I refer to your email dated 28 October 2015 requesting advice from the Department of Primary Industries (DPI) in respect to the above matter.

Comment by DPI Water

DPI Water has reviewed the Environmental Impact Statement and provides the following comments and detailed comments in Attachment A.

DPI Water advises that:

- Should dewatering greater than 3 ML in any given year be required to allow construction to proceed, a licence may need to be obtained from DPI Water to account for the take of groundwater.

The need for a licence will be dependent on the volume of groundwater take and the management of associated impacts – these will need to be supported by regular monitoring of water levels in purpose-built bores well in advance of the commencement of any excavation to obtain baseline data.

The applicant should consult with DPI Water regarding the need for a licence once sufficient groundwater level monitoring data has been obtained from the subject site.

- Landfill monitoring programs are required to be consistent with the *Draft Environmental Guidelines: Solid Waste Landfills Second Edition 2015* (including the minimum standards for groundwater monitoring to detect pollution by leachate under Section 4.4). Because the landfill monitoring program is designed for that specific purpose, the groundwater monitoring is substantially focussed on water quality aspects more so than water levels. As a result, the

applicant should demonstrate that the suggested expansion of the existing landfill monitoring plan will be appropriate and achievable for:

- (1) the detection of adverse groundwater level and quality (not necessarily only leachate) impacts beneath the proposed development site and within the design excavation depth range;
- (2) the protection of groundwater dependent ecosystems in nearby locations on-site or off-site; and
- (3) the identification of salinity impacts arising from the development.

For further information please contact Janne Grose, Water Regulation Officer (Parramatta Office) on 8838 7505 or at janne.grose@dpi.nsw.gov.au.

Yours sincerely



Mitchell Isaacs
Director, Planning Policy & Assessment Advice
14/12/2015

Attachment A

Erskine Park Resource Management Facility [SSD_7075] Response to exhibition of EIS Detailed comments - DPI Water

The Department of Primary Industries, Water (DPI Water) has reviewed the Environmental Impact Statement (EIS) and provides the following additional detailed comment:

Groundwater

According to the EIS, excavations would be required for the removal of existing building footings and for the general levelling of the site. The depth of excavation for the major site preparation works is identified within the EIS as being between 3 and 5 m to accommodate the platform level of the waste transfer building. This will likely intercept those shallow groundwater zones identified in three out of the combined total of fifteen test pits and auger holes used for the geotechnical investigation.

Some mottling of the clays encountered during the geotechnical investigations suggests the possibility of salinity impacts arising from the excavations proposed for the development. Given the occurrence of the mottled clays immediately above the upper boundary of the weathered shale, there is a high likelihood that saline groundwater flow occurs within that zone and will need to be taken into account during detailed design to prevent building and environmental impacts.

Whilst the limited data appears to indicate the possible interception of groundwater by the excavations proposed as part of the development, it is also noted that an ongoing program of groundwater monitoring at the adjacent landfill has been identified in the documentation.

Further, the Statement of Commitments indicates that “*a program of groundwater monitoring would be undertaken, building on the ongoing groundwater monitoring program undertaken for the landfill*”. On the basis of the data supplied to date, the dewatering of excavations on the proposed development site is unlikely to be significant, however the proposed expansion of monitoring would provide clarification of this.

Provided the applicant can demonstrate that the groundwater monitoring proposed to be undertaken for the Stage 1 development meet the requirements of the *Draft Environmental Guidelines: Solid Waste Landfills, Second Edition* (NSW EPA, 2015¹), and that appropriate reporting is in place to the government agency administering environmental protection legislation, DPI Water is unlikely to apply additional requirements. The application of the guidelines to the subject site is warranted because the applicant has identified the proposed monitoring is to be an extension of that already being undertaken at the adjacent landfill.

Confirmation of the existing groundwater monitoring locations and schedules, as well as details of the additional monitoring proposed for the Stage 1 area should be sufficient to give confidence that the impacts on the shallow groundwater systems are no more than minimal.

End Attachment A

¹ NSW EPA, 2015. Draft Environmental Guidelines: Solid Waste Landfills, Second Edition. NSW Environment Protection Authority, Sydney. EPA 2015/0111, March. ISBN 978 1 74359 919 8.