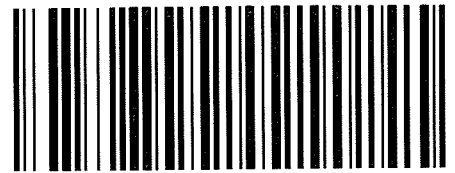




Office  
of Water



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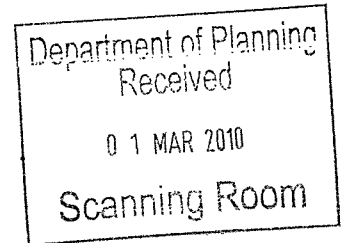
Major Development Assessment  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

Contact: Mark Mignanelli  
Phone: 02 4904 2549  
Fax: 02 4904 2501  
Email: Mark.Mignanelli@dnr.nsw.gov.au

23 February 2010

Our ref: ER20907  
Your ref: 9038784

**Attention: Andrew Hartcher**



Dear Sir

**MP07\_0048 – Exhibition of Environmental Assessment Enviroking Waste Facility Project  
Lot 931 DP 816814 John Renshaw Drive Black Hill**

I refer to your letter of 16 December 2009 inviting a submission on the environmental assessment (EA) for the project proposal. Effective from July 2009 the NSW Office of Water (NOW) is a separate office in the amalgamated Department of Environment, Climate Change and Water (DECCW).

DECCW in its administration of the *Protection of the Environment Operations Act 1997*/ Environment Protection Licence No. 11180 has a principal role to maintain ecologically sustainable development to satisfy the desired outcomes of the NSW State Government. NOW has a duty of care to ensure the protection of surface water, groundwater and basic landholder rights.

The re-use of treated waste does not form part of this project application. It is considered warranted to review details of any irrigation/ injection of waste water associated with this project.

The EA makes certain assumptions and is considered not to provide sufficient detail for assessment in respect of:

- The re-use of treated waste off-site. There is a preference for the EA to encompass the 'whole' project including the disposal and re-use of treated waste.
- The use of treated liquid waste for irrigation/ injection purposes. The EA considers groundwater contamination is not an issue as it is classed as 'treated' water and therefore there is no intention to undertake groundwater monitoring for water quality purposes based on this assumption.

Department of  
**Environment, Climate Change and Water NSW**



- The grease trap waste in the EA is classed as 'treated' after 4 hours of settlement time so as to remove material that can float. It is considered that this would not preclude any possibility of groundwater contamination.
- The use of an existing dam for the temporary storage of effluent. There are no details provided of the dam's storage capacity and if the structure is lined to prevent seepage.

NOW would support the preparation of a groundwater monitoring plan and contingency strategy for the project proposal. The groundwater monitoring program to monitor the effects of the operation and post operation impacts on groundwater, connected surface water sources and any groundwater dependant eco-systems and include:

- Details of a baseline survey to establish groundwater quality prior to the commencement of operations;
- Periodic monitoring of groundwater quality at reasonable frequency;
- Details of groundwater quality limits that would indicate contamination from the operations; and
- Contingency strategies in the event that contamination occurs.

It should be noted that monitoring bores require approval from NOW prior to their installation.

Whilst NOW does not have a principal regulatory role in this matter the points raised in this submission are considered warranted. The EA should provide additional information in relation to off-site re-use of treated waste, details of the existing dam used for temporary storage of effluent and address monitoring requirements/ contingency strategies. Any approval maybe conditioned to satisfy NOW's concerns.

Should you wish to discuss please contact me on 4904 2549.

Yours sincerely



Mark Mignanelli  
Manager Major Projects and Assessment  
**Newcastle**