

13 March 2023

Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Jane Flanagan – Secretary of the Department of Planning and Environment

Dear Jane,

Re: Approval to amend construction phase water quality monitoring suite and sediment basin release criteria for the Kings Forest Development, Kings Forest, New South Wales

Project 28 Pty Ltd commissioned Gilbert & Sutherland (G&S) to undertake a review of routine water quality monitoring at the Kings Forest site and provide advice with respect to the scope of laboratory analyses and the release criteria adopted for releases from the site's sedimentation basins during the construction phase.

The request to amend the water quality monitoring suite and sediment basin release criteria was submitted to Tweed Shire Council in January 2023 and is included in Attachment 1.

Approval

In February and March 2023, approval to amend construction phase water quality monitoring suite and sediment basin release criteria for the Kings Forest Development, Kings Forest, New South Wales was confirmed by:

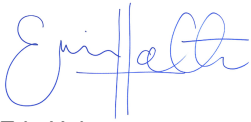
- Tweed Shire Council (TSC) in an email dated 16 February 2023 and included as Attachment 2
- Tweed Shire Council (TSC) in an email dated 9 March 2023 and included as Attachment 2

The correspondence is included in Attachment 2 and indicates that provided DPE has no objection, TSC is content to approve the amendments and formalise this by inclusion of the changes into the Adaptive Management Log for Kings Forest.

Please confirm if DPE is content to support TSC's approval of the amendments at your earliest convenience.

We trust this is acceptable. Please do not hesitate to contact this office if you require any further details or elaboration.

Yours sincerely,



Erin Holton
**Managing Director/Principal Environmental
Scientist & Engineer**
BEnvSc MEng(Env) CPESC



Diane Ayass
Environmental Scientist & Engineer
BSc(Bio) MSc(EnvEng)

Author(s) Diane Ayass

Our Reference 12066_Cover Letter_DHA1F.docx

Your Reference

By ☐ Courier ☒ Email ☐ Facsimile ☐ Post

Enclosures – Attachments 1 to 3

Attachment 1 – G&S letter dated 18 January 2023

18 January 2023

Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Scott Hetherington

Dear Scott,

Re: Amendment to construction phase water quality monitoring suite and sediment basin release criteria for the Kings Forest Development, Kings Forest, New South Wales

Project 28 Pty Ltd commissioned Gilbert & Sutherland (G&S) to undertake a review of routine water quality monitoring at the Kings Forest site and provide advice with respect to the scope of laboratory analyses and the release criteria adopted for releases from the site's sedimentation basins during the construction phase.

Overall Water Management Plan (OWMP) and monitoring requirements

As part of a wider suite of environmental compliance requirements, monthly monitoring of surface water and groundwater quality has been ongoing since commencement of site disturbance activities in mid 2022.

Surface and groundwater quality monitoring is undertaken in accordance with the requirements of the approved OWMP (G&S, December 2020). Table 1 below details the sections of the OWMP that are relevant to this correspondence.

Table 1 – Relevant sections of OWMP to which this application relates

Section of OWMP	Contents
Section 4.1	Comprehensive suite of site characterization parameters
Table 4.1.1	Surface water quality compliance parameters and criteria
Table 4.1.2	Groundwater quality compliance parameters and criteria
Section 5.6	Acid sulfate soil leachate monitoring
Section 5.7	Groundwater quality monitoring

Section 5.8	Groundwater seepage monitoring
Section 5.9	Surface water quality monitoring
Section 6.8	Groundwater monitoring
Section 7.6	Groundwater seepage monitoring
Section 7.7	Surface water quality monitoring
Section 8.6	Surface water quality monitoring

Section 4.1 of the OWMP details a broad suite of parameters which were analysed as part of the baseline assessment program for the purpose of completing a comprehensive assessment of existing conditions at the site, whilst tables 4.1.1 and 4.1.2 define a reduced list of indicator parameters to be monitored for the purpose of compliance. Section 5.7 and 5.9 of the OWMP detail the groundwater and surface water quality monitoring requirements during the bulk earthworks phase of the development. Section 7.6 and 7.7 of the OWMP detail the groundwater and surface water quality monitoring requirements during the civil construction phase of the development.

Application to reduce monitoring suite

Since commencement of site disturbance the full list of parameters (Section 4.1) have been monitored at the site with four rounds of monitoring now completed. Based on a review of the results, it is apparent that many of the parameters are consistently recording 'non-detects' or results below the laboratory's limit of report (<LOR). The full set of monitoring results are included in Attachment 1.

This letter outlines the intention to remove the secondary parameters from the routine monthly monitoring suite during the bulk earthworks and civil construction phases. Monitoring of all compliance parameters (as detailed in Tables 4.1.1 and 4.1.2) and listed below will continue in accordance with the management plans;

- pH
- Electrical Conductivity
- Dissolved Oxygen
- Turbidity
- Total Nitrogen
- Total Phosphorus
- Total and dissolved Iron
- Total and dissolved Aluminium
- Chlorophyll-a (an indicator of algal blooms)
- Litter and gross pollutants
- Oil and grease (Visual observation)

The following secondary parameters will no longer be analysed on a routine basis:

- Soluble nitrogen, nitrogen oxide, total Kjeldahl nitrogen, nitrite and nitrate;
- Ammonium;
- Soluble phosphorus;

- Cations and anions;
- Total acidity (titratable);
- Total alkalinity;
- Total and dissolved metals: arsenic, cadmium, copper, lead, nickel, zinc;
- Dissolved manganese;
- Total algal cell count; and
- Blue green algae.

Monitoring results are reviewed upon receipt by the site's Environmental Officer (Dr. Michelle Mills) and reported to DPE on a monthly basis. By continuing to monitor the full suite of compliance (indicator) parameters any issues that may arise with respect to site influences on surface and groundwater will continue to be detected and routinely reported to DPE thereby continuing to meet the objectives of the management plan, whilst improving the efficiency and reducing the cost of the monitoring program.

Should the Environmental Officer or DPE's Compliance team identify a need to reinstate any of the secondary parameters, the additional analyses could recommence upon request with results reported in the subsequent monthly monitoring report.

Modification of OWMP to align with approved ESCP and IECA Guidelines

Inconsistencies between the sediment basin discharge criteria stated in the site's Overall Water Management Plan (Gilbert & Sutherland 2020) and that stated in the site's Erosion and Sediment Control Plan (MUS, 2021) have been identified. The OWMP provides water quality criteria for the site's receiving environment whilst the ESCP provides criteria for discharge from the site's sediment basins. There is overlap between the documents and the appropriate release criteria for the basins needs clarification to assist with the practical implementation of the plans onsite.

To resolve the inconsistency and provide a practical suspended solids discharge criteria to be adopted for waters released via the site's sediment basins it is proposed that the OWMP be revised to align with the approved ESCP and the Best Practice Erosion and Sediment Control Guidelines (IECA Guidelines, 2018) value of 50mg/L. Water quality in the receiving environment will continue to be assessed against the 80th percentile baseline criteria for turbidity stated in the OWMP to ensure releases are not impacting on the receiving environment.

Table 2 summarises the 80th percentile receiving environment turbidity criteria from the OWMP in comparison to the ESCP and IECA guideline for suspended solids in sediment basin releases.

Table 2 Turbidity and suspended solids criteria comparison with IECA Guidelines

Type	Receiving environment range NTU	Site specific surface water criteria (80 th percentile) for receiving environment	ESCP and IECA guideline for sediment basin releases (mg/L)
Turbidity (NTU)			
Fresh	5.1 - 126.4	<3.1*	50
Brackish	4 - 79.5	<23.76*	50
Saline	0 - 18	<32.54*	50

*These criteria will continue to be adopted as the compliance criteria in the receiving environment

All water discharged from sediment basins will meet the IECA default standard for suspended solids of 50 mg/L with a site-specific correlation with NTU developed over time, as sufficient samples of the water accumulated in the sediment basins can be collected, as is recommended by the Guideline;

It is strongly recommended that sufficient water testing is conducted in order to enable a site-specific calibration between suspended solids concentrations (mg/L) and NTU turbidity readings. This would allow utilization of the turbidity meters to determine when water quality is likely to have reached the equivalent of 50 mg/L¹.

Monthly water quality monitoring within the receiving environment at the fresh, brackish and saline locations will continue as per the OWMP with results assessed against the turbidity compliance criteria stated in the OWMP (reproduced in Table 2 above.).

The proposed approach will be adopted for the ongoing monitoring and will allow for the timely treatment and discharge of water from the site, ensuring compliance with the overall objectives of the ESCP and OWMP.

Administration of the OWMP

Section 11.1 of the OWMP provides the pathway for the Proponent to make an application to TSC to amend the provisions of the OWMP. It indicates that the application shall;

- Be in writing
- Specify the provisions of the OWMP to which the application relates; and
- State how the proposed amendments achieve the objectives of the provisions to which the amendments relate.

¹ IECA Guideline, V2 June 2018, Page B.70.

We consider that this application considers and addresses each of these criteria. If this revision is acceptable to TSC we would ultimately make the required changes into both the OWMP and Summary of Management Plans (SOMP) to ensure all documents align.

Yours sincerely,



Erin Holton
**Managing Director/Principal Environmental
Scientist & Engineer**
BEnvSc MEng(Env) CPESC



Diane Ayass
Environmental Scientist & Engineer
BSc(Bio) MSc(EnvEng)

Attachment 1 – Monitoring results

1/8/2022 - SURFACE WATER MONITORING RESULTS

Sampled Parameter:	Locations:													
	SW1	SW2	SW3	SW4	SW5	SW6	SW7	SW8	SW9	SW10	SB 2	SB 3	SB 4	
Suspended Solids (mg/L)	7	30	30	6	15	16	34	18	34	57			4	
Nitrogen (Total) (mg/L)	0.36	0.45	0.94	0.72	0.85	0.85	3.11	1.7	0.34	1.09	1.75	0.74	0.7	
Nitrogen (Soluble) (mg/L)	0.17	0.33	0.52	0.71	0.71	0.75	1.89	1.25	0.24	0.39	1.26	0.49	0.49	
Nitrogen oxidized -N (mg/L)	0.02	0.04	0.06	0.04	0.08	0.07	1.61	0.03	0.03	0.04	0.07	0.02	0.02	
Total Kjeldahl Nitrogen (by calculation) (mg/L)	0.34	0.41	0.88	0.68	0.77	0.78	1.5	1.67	0.31	1.05	1.68	0.67	0.67	
Nitrate -N (mg/L)	<0.02	<0.02	<0.02	0.02	0.02	0.02	<0.02	0.03	<0.02	<0.02	0.07	0.03	0.03	
Nitrite -N (mg/L)	0.02	0.04	0.06	0.02	0.06	0.05	1.51	<0.02	0.03	0.04	<0.02	<0.02	<0.02	
Total phosphorus-P (mg/L)	0.02	0.03	0.1	0.03	0.03	0.03	0.23	0.21	0.05	0.09	0.07	0.03	0.03	
Total Soluble phosphorus-P (mg/L)	<0.02	<0.02	0.04	0.02	0.02	0.02	0.02	0.04	<0.02	0.02	0.02	<0.02	<0.02	
Calcium (mg/L)	5.9	6.8	4.6	4.1	4	4.5	3.3	2	267	4.5	6.3	6.3	0.9	
Magnesium (mg/L)	7.8	10	4	3.7	4.6	6.6	5	2.9	854	4	1.3	1.3	1.2	
Sodium (mg/L)	31	71	20	19	28	45	32	8	6880	20	6.3	6.3	7.2	
Potassium (mg/L)	3.4	6.4	2	1.4	1.6	2.1	8.3	6.1	270	1.5	0.6	0.6	0.5	
Carbonate as CaCO3 (mg/L)	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	
Bicarbonate as CaCO3 (mg/L)	1	4	10	14	15	16	6	7	91	27	NP	NP	NP	
Iron (Soluble) (mg/L)	0.07	0.18	0.9	1.82	1.45	1.45	1.38	1.83	<0.01	0.88	0.42	0.2	0.2	
Iron (Total) (mg/L)	1.03	4	3.05	2.82	2.05	1.95	8.25	5.28	1.92	5.45	0.56	0.56	0.25	
Aluminum (Total) (mg/L)	0.47	1.82	1.31	0.37	0.41	0.52	5.93	0.77	0.92	1.4	0.8	0.88	0.68	
Aluminum (Soluble) (mg/L)	0.24	0.14	0.12	0.25	0.33	0.42	0.05	0.31	0.2	0.12	0.56	0.43	0.43	
Manganese (Soluble) (mg/L)	0.443	0.36	0.122	0.094	0.061	0.062	0.062	0.093	0.078	0.095	0.012	0.014	0.014	
Chloride (mg/L)	83	130	31	33	47	81	55	23	11,700	28	15	15	11	
Sulfate (mg/L)	44	45	6	6.9	9.5	13	8.1	3.3	1,860	3.3	1.6	1.6	1.7	
Ammonia - N (mg/L)	<0.02	0.02	0.04	0.04	0.05	0.06	0.08	<0.02	0.02	<0.02	0.08	0.08	0.02	
Total acidity (titratable) CaCO3 (mg/L)	5	4	10	14	16	16	6	32	3	11	20	9	9	
Total alkalinity as CaCO3 (mg/L)	1	4	27	21	15	16	21	7	91	27	<1	<1	<1	
Arsenic (mg/L)	<0.001	0.002	0.001	<0.001	<0.001	0.001	0.001	<0.001	0.01	0.001	<0.001	<0.001	<0.001	
Cadmium (mg/L)	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.001	<0.001	<0.001	<0.001	<0.001	
Copper (mg/L)	<0.001	0.004	0.002	<0.001	<0.001	0.001	0.021	0.002	0.002	<0.001	<0.001	<0.001	<0.001	
Lead (mg/L)	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.001	<0.001	0.002	<0.001	<0.001	<0.001	<0.001	
Nickel (mg/L)	0.003	0.005	0.001	<0.001	<0.001	<0.001	0.0091	0.004	0.002	<0.001	<0.001	<0.001	<0.001	
Zinc (mg/L)	0.021	0.024	0.029	0.006	0.006	0.006	0.031	0.007	0.121	0.012	0.008	0.005	0.005	
Thermobacter count (cfu/100ml)	<10	10	230	70	130	170	40	<10	120	110	60	130	33,400	
Total Bacter count (colb/ml)	11,320	8,620	6,740	6,600	6,790	5,620	19,880	6,540	2,200	9,800	1,300	33,400	33,400	
Blue green algae (colb/ml)	440	2,400	720	1,700	8,500	2900	42,200	360	3,040	5,800	0	8,200	8,200	
Chlorophyll 'a' (µg/L)	16	15	8	2	6	6	33	12	7	72	1	7	7	

1/9/2022 - SURFACE WATER MONITORING RESULTS

Sampled Parameter:	Locations:										SB 2	SB 3
	SW1	SW2	SW3	SW4	SW5	SW6	SW7	SW8	SW9	SW10		
Suspended Solids (mg/L)	No data new TSC gate is locked Scott Hetherington to	33	4	2	196	12	1	16	6	32	No data – water level too low	21
Nitrogen (Total) (mg/L)		0.59	0.49	0.62	2.84	0.93	0.47	6.76	0.38	0.83		1.11
Nitrogen (Soluble) (mg/L)		0.4	0.41	0.54	0.81	0.76	0.42	2.17	0.26	0.45		0.64
Nitrogen oxidized -N (mg/L)		0.05	0.04	0.02	0.03	0.03	<0.02	0.06	0.02	0.03		<0.02
Total Kjeldahl Nitrogen (by calculation) (mg/L)		0.54	0.45	0.6	2.81	0.9	0.47	6.7	0.36	0.8		1.06
Nitrate-N (mg/L)		<0.02	<0.02	<0.02	0.02	0.03	<0.02	0.06	<0.02	<0.02		0.05
Nitrate-N mg/L		0.05	0.04	0.02	<0.02	<0.02	<0.02	<0.02	0.02	0.03		<0.02
Total phosphorus-P (mg/L)		0.05	0.04	0.03	0.22	0.05	0.03	2.18	0.02	0.08		0.05
Total Soluble phosphorus-P (mg/L)		<0.02	0.02	0.03	0.03	0.02	0.02	0.7	<0.02	0.02		<0.02
Calcium (mg/L)		16	5.5	4.2	3.5	3.9	2.6	1.9	182	4.8		0.09
Magnesium (mg/L)		39	4.5	3.6	4.1	5.3	2.7	3.6	578	4.3		1.4
Sodium (mg/L)		313	22	19	25	36	16	6.7	4,720	23		9
Potassium (mg/L)		14	1.7	1.7	1.8	4.2	1.3	8.5	186	2.4		1.2
Carbonate as CaCO3 (mg/L)		NP	NP	NP	NP	NP	NP	NP	NP	NP		NP
Bicarbonate as CaCO3 (mg/L)		6	29	21	16	14	18	9	61	27		<1
Iron (Soluble) (mg/L)		0.28	0.69	1.32	1.37	1.34	0.35	3.13	0.1	0.74		0.21
Iron (total) (mg/L)		2.04	1.24	2	7.77	2.07	0.56	3.86	0.59	4.88		0.26
Aluminum (total) (mg/L)		1.23	0.15	0.31	4.98	0.72	0.07	0.71	0.24	1.15		0.74
Aluminum (soluble) (mg/L)		0.15	0.09	0.21	0.42	0.42	0.05	0.53	0.17	0.098		0.49
Manganese (Soluble) (mg/L)		0.395	0.055	0.081	0.041	0.045	0.046	0.079	0.104	0.053		0.013
Chloride (mg/L)		640	41	31	47	66	26	21	9350	130		17
Sulfate (mg/L)		100	5	6.7	7.9	11	3.4	4.1	1,180	6.1		2
Ammonia – N (mg/L)		0.1	<0.02	0.02	0.03	0.04	<0.02	0.02	<0.02	<0.02		0.03
Total acidity (titratable) CaCO3 (mg/L)		5	10	15	16	16	17	41	2	9		9
Total alkalinity as CaCO3 (mg/L)		6	29	21	16	14	18	9	61	27		<1
Arsenic (mg/L)		0.002	<0.001	<0.001	0.002	<0.001	<0.001	<0.001	0.005	0.002		<0.001
Cadmium (mg/L)		<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001		<0.001
Copper (mg/L)		0.002	<0.001	<0.001	0.002	<0.001	<0.001	0.002	<0.001	0.003		<0.001
Lead (mg/L)		0.001	<0.001	<0.001	0.001	<0.001	<0.001	<0.001	<0.001	<0.001		<0.001
Nickel (mg/L)		0.002	<0.001	<0.001	0.002	<0.001	<0.001	0.002	<0.001	0.001		<0.001
Zinc (mg/L)		0.015	<0.005	<0.005	0.024	0.005	<0.005	0.016	0.02	0.019		0.006
Thermotolerant coliforms (cfu/100ml)		80	30	220	400	100	40	<10	60	390		690
Total algal count (cells/ml)		2,480	9,640	8,710	20,960	29,200	2,100	3,640	10,900	10,990		201,700
Blue green algae (cells/ml)		ND	ND	160	15,000	25,500	ND	1,300	560	2,000		700
Chlorophyll a (µg/L)		6	12	4	8	4	5	22	3	22		9

1/10/2022 - SURFACE WATER MONITORING RESULTS

Sampled Parameter:	Locations:									
	SW1	SW2	SW3	SW4	SW5	SW6	SW7	SW8	SW9	SW10
Suspended Solids (mg/L)	No data	8	5	10	36	19	7	18	37	30
Nitrogen (Total) (mg/L)	new TSC gate is locked – Scott Hetherington of TSC is sourcing new key.	0.35	0.55	0.81	1.19	0.48	0.67	2.21	0.23	0.73
Nitrogen (Soluble) (mg/L)		0.35	0.46	0.68	0.68	0.28	0.56	1.52	0.23	0.45
Nitrogen oxidized -N (mg/L)		0.05	0.03	0.03	0.05	<0.02	0.06	0.06	0.02	0.02
Total Kjeldahl Nitrogen (by calculation) (mg/L)		0.3	0.52	0.78	1.14	0.48	0.61	2.15	0.21	0.71
Nitrite-N (mg/L)		<0.02	<0.02	0.02	0.02	<0.02	0.02	0.03	<0.02	<0.02
Nitrate-N mg/L		0.05	0.03	<0.02	0.03	<0.02	0.04	0.03	0.02	0.02
Total phosphorus-P (mg/L)		<0.02	0.05	0.05	0.09	0.04	0.07	0.28	<0.02	0.07
Total Soluble phosphorus-P (mg/L)		<0.02	0.03	0.03	0.02	<0.02	0.04	0.12	<0.02	0.03
Calcium (mg/L)		15	4.2	4	3.4	3.3	3.1	0.8	334	4.1
Magnesium (mg/L)		35	3.6	3.5	3.5	3.9	2.9	3.7	1,060	3.5
Sodium (mg/L)		276	17	17	19	24	13	6.2	8,580	18
Potassium (mg/L)		13	1.5	1.4	1.3	5.8	1.7	2.5	374	1.5
Carbonate as CaCO3 (mg/L)		NP	NP	NP	NP	NP	NP	NP	<1	NP
Bicarbonate as CaCO3 (mg/L)		9	25	21	14	2	22	2	110	25
Iron (soluble) (mg/L)		0.47	1.49	2.64	1.48	0.71	3.33	1.41	<0.20	1.75
Iron (total) (mg/L)		0.86	2.55	4.5	3.63	1.82	4.33	2.14	0.37	6.04
Aluminum (total) (mg/L)		0.34	0.25	0.46	1.49	1.25	0.13	0.53	0.36	0.61
Aluminum (soluble) (mg/L)		0.22	0.14	0.26	0.33	0.38	0.08	0.37	0.24	0.13
Manganese (Soluble) (mg/L)		0.303	0.322	0.28	0.073	0.212	0.217	0.048	0.02	0.286
Chloride (mg/L)		570	42	30	35	44	25	21	19,200	29
Sulfate (mg/L)		106	4.8	6.6	7.5	24	2.4	5	2,460	4.7
Ammonia – N (mg/L)		0.06	0.02	0.03	0.03	0.07	0.03	<0.02	<0.02	0.02
Total acidity (titratable) CaCO3 (mg/L)		6	12	17	13	14	21	39	<1	10
Total alkalinity as CaCO3 (mg/L)		9	25	21	14	2	22	2	110	25
Arsenic (mg/L)		0.001	<0.001	0.001	<0.001	0.001	<0.001	<0.001	0.01	0.002
Cadmium (mg/L)		<0.001	<0.001	0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
Copper (mg/L)		<0.001	<0.001	<0.001	<0.001	0.001	<0.001	<0.001	<0.001	<0.001
Lead (mg/L)		<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
Nickel (mg/L)		0.002	<0.001	<0.001	<0.001	0.002	<0.001	<0.001	<0.001	<0.001
Zinc (mg/L)		0.013	0.007	0.006	0.007	0.0091	0.007	0.0097	0.021	0.008
Thermotolerant coliforms (cfu/100ml)		40	110	220	40	50	70	110	20	310
Total algal count (cells/ml)		1820	13,540	4,680	7,180	5300	9500	5360	14,420	5100
Blue green algae (cells/ml)		0	1,600	2,900	43,800	4600	1400	1700	0	5000
Chlorophyll 'a' (µg/L)		6	8	5	9	50	3	9	3	<1

1/11/2022 - SURFACE WATER MONITORING RESULTS

Sampled Parameter:	Locations:									
	SW1	SW2	SW3	SW4	SW5	SW6	SW7	SW8	SW9	SW10
Suspended Solids (mg/L)	No data TSC changed lock; Scott Hehnerington sourcing lock	17	39	74	10	10	120	Water level too low	25	12
Nitrogen (Total) (mg/L)		0.49	0.62	1.4	0.93	0.58	1.37		0.38	0.55
Nitrogen (Soluble) (mg/L)		0.33	0.26	0.64	0.76	0.38	0.39		0.26	0.38
Nitrogen oxidized -N (mg/L)		<0.02	<0.02	0.02	0.02	<0.02	<0.02		<0.02	<0.02
Total Kjeldahl Nitrogen (by calculation) (mg/L)		0.49	0.62	1.38	0.91	0.58	1.37		0.38	0.55
Nitrite-N (mg/L)		<0.02	<0.02	0.02	0.02	<0.02	<0.02		<0.02	<0.02
Nitrate-N mg/L		<0.02	<0.02	<0.02	<0.02	<0.02	<0.02		<0.02	<0.02
Total phosphorus-P (mg/L)		0.03	0.09	0.1	0.05	0.03	0.16		0.02	0.05
Total Soluble phosphorus-P (mg/L)		<0.02	0.02	0.03	0.02	<0.02	0.03		<0.02	0.02
Calcium (mg/L)		7.4	4.4	4.3	5.3	4.6	2.7		166	4.4
Magnesium (mg/L)	Water level too low	16	4.3	3.8	7.6	7.2	3.3		522	3.9
Sodium (mg/L)		125	20	18	51	52	20		4330	20
Potassium (mg/L)		6.7	0.6	1.3	2.4	3.7	2.7		187	1.1
Carbonate as CaCO3 (mg/L)		NP	NP	NP	NP	NP	NP		NP	NP
Bicarbonate as CaCO3 (mg/L)		9	37	30	23	6	20		59	33
Iron (soluble) (mg/L)		1.12	0.86	2.17	2.14	1.05	1.45		0.05	1.65
Iron (total) (mg/L)		2.27	6.58	11.1	3.33	2.32	4.66		0.91	2.83
Aluminum (total) (mg/L)		0.41	0.55	1.02	0.42	0.35	1.27		0.29	0.14
Aluminum (soluble) (mg/L)		0.15	0.04	0.17	0.32	0.14	0.09		0.14	0.08
Manganese (soluble) (mg/L)		0.167	0.407	0.196	0.139	0.196	0.108		0.141	0.164
Chloride (mg/L)	Water level too low	230	29	28	100	95	40		8,100	28
Sulfate (mg/L)		49	2.5	5.1	14	30	4.5		1150	3.5
Ammonia – N (mg/L)		<0.02	<0.02	<0.02	0.07	<0.02	0.05		0.02	<0.02
Total acidity (titratable) CaCO3 (mg/L)		4	14	16	19	5	19		1	10
Total alkalinity as CaCO3 (mg/L)		9	37	30	23	6	20		59	33
Arsenic (mg/L)		0.02	0.002	0.002	<0.001	0.002	0.001		0.007	0.001
Cadmium (mg/L)		<0.001	<0.001	<0.001	<0.001	<0.001	<0.001		<0.001	<0.001
Copper (mg/L)		<0.001	<0.001	<0.001	<0.001	<0.001	0.002		<0.001	<0.001
Lead (mg/L)		<0.001	<0.001	<0.001	<0.001	<0.001	<0.001		<0.001	<0.001
Nickel (mg/L)		<0.001	<0.001	<0.001	<0.001	0.001	<0.001		<0.001	<0.001
Zinc (mg/L)	Water level too low	<0.005	<0.005	<0.005	<0.005	0.008	0.01		<0.005	<0.005
Thermotolerant coliforms (cfu/100ml)		410	530	1240	590	610	220		2160	1180
Total algal count (cells/ml) (non-blue green)		70,660	45,300	67,300	18,300	50,000	24,300		18,800	10,500
Blue green algae (cells/ml)		27,540	60,800	37,700	54,100	54,000	16,000		ND	410
Chlorophyll a (µg/L)		10	17	8	9	7	26		2	14

August 2022 - Groundwater Monitoring Results

Parameters Tested:	Borehole Locations																			
	TSC10	TSC16	910	911	912	913	91	92	93	94	95	96	97	98	99	BH1	BH2	BH3	BH4	BH5
Total Nitrogen (mg/L)	3	3.64	1.92	10.6				1.37			3.49		1.86		1.68	2.14	2.44		3.5	
Total Soluble Nitrogen (mg/L)	2.39	1.53	0.87	5.65				0.9			0.61		0.78		0.99	1.56	1.26		1.31	
Nitrogen oxidised (mg/L)	0.04	0.05	0.03	0.32				0.02			0.02		0.02		0.05	0.09	0.05		0.04	
Total Kjeldahl Nitrogen (by calculation) (mg/L)	2.96	3.59	1.89	10.3				1.35			3.47		1.84		1.63	2.05	2.39		3.46	
Nitrite-N (mg/L)	0.04	0.05	0.03	0.32				0.02			0.02		0.02		0.05	0.09	0.05		0.04	
Nitrate-N (mg/L)	<0.02	<0.02	<0.02	<0.02				<0.02			<0.02		<0.02		<0.02	<0.02	<0.02		<0.02	
Total Phosphorus-P (mg/L)	0.21	0.16	0.12	0.3				0.22			0.3		0.68		0.09	0.23	0.33		0.22	
Soluble phosphorus (mg/L)	<0.02	0.03	<0.02	0.15				<0.02			0.05		0.08		0.02	0.14	0.07		0.06	
Calcium (mg/L)	76	6.7	2.7	8.7				5.1			0.6		2.2		0.5	<0.1	2.4		0.5	
Magnesium (mg/L)	8.9	1.5	1.2	10				0.6			1.2		1.1		1.6	0.1	1.6		1.3	
Sodium (mg/L)	14	9.6	6.7	70				4.8			4.4		4.8		8.9	16	5.1		6.7	
Potassium (mg/L)	3.3	0.8	<0.5	3.3				0.6			0.6		1.4		1.9	5.2	1.2		3.1	
Carbonate (mg/L)	NP	NP	NP	NP				NP			NP		NP		NP	NP	NP		NP	
Bicarbonate (mg/L)	251	12	NP	3				6			2		3		NP	7	NP		NP	
Iron (Total) (mg/L)	16.1	1.76	0.67	8.19				0.42			0.74		0.49		0.31	3.37	1.17		1.12	
Iron (soluble) (mg/L)	5.03	0.81	0.48	6.18				0.29			0.21		0.22		0.21	0.22	0.38		0.47	
Aluminium (soluble) (mg/L)	0.03	0.42	0.79	5.09				0.18			0.95		0.48		0.99	0.21	0.44		0.33	
Aluminium (total) (mg/L)	0.55	0.85	0.79	10.6				0.37			0.95		0.48		0.99	7.16	2.9		2.34	
Manganese (soluble) (mg/L)	0.81	0.023	0.002	0.042				0.005			0.001		0.006		0.006	0.001	0.013		0.011	
Chloride (mg/L)	18	14	15	130				25			14		14		16	50	30		21	
Sulfate (mg/L)	9.3	2	1.3	20				1.5			0.8		1.5		1.6	4	2.7		5.7	
Ammonia-N (mg/L)	2.1	0.17	0.02	1.5				0.06			0.05		0.05		0.08	0.61	0.35		0.45	
Total Acidity (titratable) (mg/L)	58	66	100	240				50			40		26		86	120	82		77	
Total alkalinity (mg/L)	251	12	<1	3				6			2		3		<1	7	<1		<1	
Arsenic (mg/L)	0.002	0.001	<0.001	0.007				<0.001			<0.001		<0.001		<0.001	0.011	0.004		0.002	
Cadmium (mg/L)	<0.001	<0.001	<0.001	<0.001				<0.001			<0.001		<0.001		<0.001	<0.001	<0.001		<0.001	
Copper (mg/L)	0.002	0.006	0.002	0.012				<0.001			0.004		0.003		0.001	0.021	0.008		0.007	
Lead (mg/L)	0.009	0.005	<0.001	0.005				0.001			<0.001		0.002		0.002	0.01	0.004		0.002	
Nickel (mg/L)	<0.001	0.002	0.001	0.022				<0.001			0.002		0.002		0.002	0.011	0.011		0.007	
Zinc (mg/L)	0.87	0.249	0.014	0.056				<0.005			0.007		0.034		0.015	0.074	0.136		0.133	
Thermotolerant coliforms (cfu/100ml)	<10	<10	<10	<50				<10			<10		360		<10	<50	<50		70	

September 2022 - Groundwater Monitoring Results

Parameters Tested:	Borehole Locations																			
	TSC10	TSC16	910	911	912	913	91	92	93	94	95	96	97	98	99	BH1	BH2	BH3	BH4	BH5
Total Nitrogen (mg/L)	2.62	3.25	0.02	9.06				1.57			1.66		0.92		1.31	13.5	2.79		3.07	
Total Soluble Nitrogen (mg/L)	2.3	2.53	0.99	5.48				1.17			0.05		0.67		0.87	1.66	1.24		1.4	
Nitrogen oxidised (mg/L)	0.07	0.12	0.02	0.38				0.03			0.02		0.03		0.06	0.15	0.05		0.05	
Total Kjeldahl Nitrogen (by calculation) (mg/L)	2.55	3.13	1.38	8.68				1.54			1.64		0.89		1.25	13.4	2.74		3.02	
Nitrite-N (mg/L)	0.07	0.12	0.02	0.38				0.03			0.02		0.03		0.06	0.15	0.05		0.05	
Nitrate-N (mg/L)	<0.02	<0.02	<0.02	<0.02				<0.02			<0.02		<0.02		<0.02	<0.02	<0.02		<0.02	
Total Phosphorus-P (mg/L)	0.12	0.12	0.03	0.73				0.2			0.13		0.4		0.05	0.62	0.22		0.29	
Soluble phosphorus (mg/L)	<0.02	0.04	<0.02	0.13				0.02			0.05		0.06		<0.02	0.16	0.07		0.07	
Calcium (mg/L)	76	2.3	2.5	7.9				6			0.9		2.2		0.5	<0.1	2.6		0.4	
Magnesium (mg/L)	8.6	2.9	1.1	9.7				0.6			1.9		1.3		1.3	13	3		NP	
Sodium (mg/L)	15	12	5.9	64				4.9			4.4		5		7.5	15	5.4		5.3	
Potassium (mg/L)	3.7	1.3	0.6	3.3				0.6			0.9		23		2.5	0.94	1.1		1.3	
Carbonate (mg/L)	NP	NP	NP	NP				NP			NP		NP		NP	NP	NP		NP	
Bicarbonate (mg/L)	245	6	NP	9				6			3		3		NP	13	3		NP	
Iron (Total) (mg/L)	15.7	1.97	0.44	7.62				0.44			0.27		0.28		0.44	5.79	1.02		0.98	
Iron (soluble) (mg/L)	7.34	1.6	0.37	5.62				0.37			0.15		0.23		0.11	0.26	0.42		0.35	
Aluminium (soluble) (mg/L)	0.03	1.17	0.37	5.07				0.2			0.14		0.15		0.58	0.23	0.42		0.35	
Aluminium (total) (mg/L)	0.49	2.06	0.52	10.3				0.33			0.43		0.26		0.87	14.5	2.47		2.01	
Manganese (soluble) (mg/L)	0.853	0.029	0.002	0.039				<0.001			0.001		0.007		0.002	0.002	0.014		0.012	
Chloride (mg/L)	22	12	15	170				9			11		36		15	<3	12		12	
Sulfate (mg/L)	7.7	6.1	1.2	17				1.1			0.08		1.5		1.3	3.6	2.2		4.3	
Ammonia-N (mg/L)	1.94	0.48	0.02	1.22				0.06			0.05		0.05		0.08	0.63	0.37		0.4	
Total Acidity (titratable) (mg/L)	86	140	93	240				57			46		31		93	160	96		94	
Total alkalinity (mg/L)	245	6	<1	9				6			3		3		<1	13	3		<1	
Arsenic (mg/L)	0.001	0.001	<0.001	0.006				<0.001			<0.001		<0.001		<0.001	0.018	0.003		0.002	
Cadmium (mg/L)	<0.001	<0.001	<0.001	<0.001				<0.001			<0.001		<0.001		<0.001	<0.001	<0.001		<0.001	
Copper (mg/L)	0.003	0.003	<0.001	0.0098				<0.001			0.002		0.001		<0.001	0.034	0.007		0.006	
Lead (mg/L)	0.004	0.002	<0.001	0.004				<0.001			<0.001		<0.001		<0.001	0.017	0.003		0.001	
Nickel (mg/L)	<0.001	0.004	<0.001	0.019				<0.001			<0.001		0.001		0.001	0.017	0.009		0.004	
Zinc (mg/L)	0.105	0.036	0.036	0.053				0.009			0.009		0.009		0.16	0.088	0.11		0.183	
Thermotolerant coliforms (cfu/100ml)	<10	20	<10	<10				<10			<10		<10		<10	<100	40		<20	

October 2022 - Groundwater Monitoring Results

Parameters Tested:	Borehole Locations																			
	TSC10	TSC16	910	911	912	913	91	92	93	94	95	96	97	98	99	BH1	BH2	BH3	BH4	BH5
Total Nitrogen (mg/L)	2.81		1.18					1.6			1.2		0.9			8.83	2.44		2.51	
Total Soluble Nitrogen (mg/L)	2.53		0.83					1.14			0.56		0.62			1.42	1.21		1.13	
Nitrogen oxidised (mg/L)	0.03		0.02					0.03			0.02		0.02			0.02	0.05		0.04	
Total Kjeldahl Nitrogen (by calculation) (mg/L)	2.81		1.18					1.57			1.18		0.88			8.83	2.39		2.47	
Nitrite-N (mg/L)	0.03		0.02					0.03			0.02		0.02			0.01	0.05		0.04	
Nitrate-N (mg/L)	<0.02		<0.02					<0.02			<0.02		<0.02			<0.02	<0.02		<0.02	
Total Phosphorus-P (mg/L)	0.17		0.04					0.21			0.1		0.21			0.48	0.18		0.18	
Soluble Phosphorus (mg/L)	<0.02		<0.02					0.02			0.04		0.06			0.15	0.07		0.07	
Calcium (mg/L)	69		3.3					5.9			1		2.3			<0.1	2.8		0.5	
Magnesium (mg/L)	7		1.1					0.7			1.6		1.2			<0.1	1.8		1.4	
Sodium (mg/L)	14		7.3					5			4.9		4.2			14	5.2		5.1	
Potassium (mg/L)	3.3		<0.5					1.4			1.1		0.7			0.92	1.3		0.98	
Carbonate (mg/L)	NP		NP					NP			NP		NP			NP	NP		NP	
Bicarbonate (mg/L)	217		NP					8			2		3			13	3		NP	
Iron (Total) (mg/L)	11.9		0.4					0.38			0.42		0.34			3.13	0.83		1.26	
Iron (soluble) (mg/L)	4.65		0.33					0.26			0.26		0.27			0.19	0.35		0.53	
Aluminium (soluble) (mg/L)	0.03		0.35					0.24			0.18		0.15			0.17	0.39		0.31	
Aluminium (total) (mg/L)	0.34		0.52					0.46			0.42		0.26			7.26	1.85		2.2	
Manganese (soluble) (mg/L)	0.751		0.002					0.002			0.002		0.007			<0.001	0.014		0.013	
Chloride (mg/L)	16		16					14			14		12			16	32		24	
Sulfate (mg/L)	2.5		3.4					1.5			1.4		1.5			3.2	2.2		4.1	
Ammonia-N (mg/L)	1.95		0.02					0.13			0.06		0.05			0.55	0.37		0.29	
Total Acidity (titratable) (mg/L)	47		71					43			45		37			130	82		80	
Total alkalinity (mg/L)	217		<1					8			2		3			13	3		<1	
Arsenic (mg/L)	<0.001		<0.001					<0.001			<0.001		<0.001			0.008	0.002		0.001	
Cadmium (mg/L)	<0.001		<0.001					<0.001			<0.001		<0.001			<0.001	<0.001		<0.001	
Copper (mg/L)	0.002		0.001					0.001			0.002		<0.001			0.024	0.006		0.006	
Lead (mg/L)	0.003		<0.001					0.002			<0.001		<0.001			0.092	0.001		0.001	
Nickel (mg/L)	0.001		0.001					0.001			<0.001		<0.001			0.093	0.008		0.003	
Zinc (mg/L)	0.071		0.018					0.022			0.017		0.01			0.036	0.088		0.188	
Thermotolerant coliforms (cfu/100ml)	<20		<20					960			930		150			10	140		40	

November 2022 - Groundwater Monitoring Results

Parameters Tested:	Borehole Locations																			
	Precinct 5										Precinct 1									
	TSC10	TSC16	910	911	912	913	91	92	93	94	95	96	97	98	99	BH1	BH2	BH3	BH4	BH5
Total Nitrogen (mg/L)	3.03	2.66		9.6				1.61			0.76		1.15			6.46	2.08		2.56	
Total Soluble Nitrogen (mg/L)	2.91	2.3		5.83				1.16			0.47		0.58			1.42	1.17		1.42	
Nitrogen oxidised (mg/L)	0.04	0.08		0.35				0.05			<0.02		0.02			0.09	0.07		0.05	
Total Kjeldahl Nitrogen (by calculation) (mg/L)	2.99	2.58		9.25				1.56			0.76		1.13			6.37	2.01		2.51	
Nitrite-N (mg/L)	0.04	0.08		0.35				0.05			<0.02		0.02			0.09	0.04		0.05	
Nitrate-N (mg/L)	<0.02	<0.02		<0.02				<0.02			<0.02		<0.02			<0.02	0.03		<0.02	
Total Phosphorus-P (mg/L)	0.12	0.09		0.83				0.41			0.09		0.38			0.36	0.15		0.19	
Soluble Phosphorus (mg/L)	0.02	0.04		0.3				0.03			0.06		0.05			0.15	0.06		0.06	
Calcium (mg/L)	73	6.4		5.9				4.6			0.9		2.5			<0.1	2.4		0.6	
Magnesium (mg/L)	8.3	3		8.9				0.6			1.6		1.5			<0.01	1.8		1.6	
Sodium (mg/L)	16	11		68				4.7			4.3		4.3			68	14		6.8	
Potassium (mg/L)	4	1.4		3.4				1.6			<0.5		0.8			0.95	1		3.5	
Carbonate (mg/L)	NP	NP		NP				NP			NP		NP			NP	NP		NP	
Bicarbonate (mg/L)	240	13		14				7			4		4			12	2		NP	
Iron (Total) (mg/L)	14.8	1.8		6.82				0.29			0.12		0.35			1.94	0.6		0.82	
Iron (soluble) (mg/L)	5.58	1.58		5.56				0.23			0.08		0.27			0.17	0.35		0.44	
Aluminium (soluble) (mg/L)	0.03	1.11		4.98				0.47			0.08		0.16			0.19	0.4		0.36	
Aluminium (total) (mg/L)	0.35	1.57		9.23				0.58			0.16		0.27			4.69	1.25		1.36	
Manganese (soluble) (mg/L)	0.743	0.041		0.039				0.001			0.001		0.007			0.001	0.014		0.017	
Chloride (mg/L)	24	20		100				13			9		10			25	11		14	
Sulfate (mg/L)	6.3	18		20				3.4			2.8		2.2			8.5	6.3		4.2	
Ammonia-N (mg/L)	2.53	0.46		2.1				0.24			0.04		0.05			0.57	0.33		0.35	
Total Acidity (titratable) (mg/L)	49	87		210				36			31		29			94	67		55	
Total alkalinity (mg/L)	240	13		14				7			4		4			12	2		<1	
Arsenic (mg/L)	0.001	0.002		0.005				0.001			<0.001		<0.001			0.005	0.002		0.001	
Cadmium (mg/L)	<0.001	<0.001		<0.001				<0.001			<0.001		<0.001			<0.001	<0.001		<0.001	
Copper (mg/L)	0.002	0.002		0.009				<0.001			<0.001		<0.001			0.014	0.003		0.006	
Lead (mg/L)	0.003	<0.001		0.004				0.001			<0.001		<0.001			0.005	<0.001		<0.001	
Nickel (mg/L)	0.001	0.004		0.018				<0.001			<0.001		<0.001			0.006	0.006		0.002	
Zinc (mg/L)	0.097	0.013		0.041				0.009			0.008		<0.005			0.02	0.065		0.166	
Thermotolerant coliforms (cfu/100ml)	<10	10		<20				<10			<10		<10			<20	<10		<20	

Attachment 2 – TSC approval

From: David Bell DBell@tweed.nsw.gov.au 
Subject: RE: Kings Forest - Water quality monitoring suite and sediment basin criteria [12066]
Date: 9 March 2023 at 10:07 am
To: Erin Holton holton.el@access.gs
Cc: Michelle Michelle@mkeh.com.au, Michael Geale mgeale@ledaholdings.com.au, Valerie Conway VConway@tweed.nsw.gov.au, GC Office gcoffice@ledaholdings.com.au, Scott Benitez Hetherington SHetherington@tweed.nsw.gov.au

DB

Hi Erin

Thanks for your e-mail and attachment. I note the information in the attachment regarding suspended solids and relevant guidelines. I also note that suspended solids 50 mg/L is a common concentration limit for discharge from NSW EPA licensed premises. There are no objections to the proposal to address the inconsistency regarding suspended solids, subject to continued management/review of monitoring by the site's Environmental Officer (Dr. Michelle Mills), and no objections being raised by DPE.

Regards

David

From: Erin Holton <holton.el@access.gs>
Sent: Monday, 20 February 2023 11:09 AM
To: David Bell <DBell@tweed.nsw.gov.au>
Cc: 'Michelle' <Michelle@mkeh.com.au>; Michael Geale <mgeale@ledaholdings.com.au>; Valerie Conway <VConway@tweed.nsw.gov.au>; GC Office <gcoffice@ledaholdings.com.au>; Scott Benitez Hetherington <SHetherington@tweed.nsw.gov.au>
Subject: Re: Kings Forest - Water quality monitoring suite and sediment basin criteria [12066]

Hi David,

Thank you for attending to this issue so promptly. I did want to follow up with you on one aspect of the request. I've attached it again here for ease of reference. You will note on Page3/4 there is an additional item for which we are seeking approval. It relates to the discharge criteria for the site's sediment basins. Would you mind having a read over it and letting me know if that proposed amendment is acceptable to TSC?

My number is 0433 005 328 if you would like to discuss.

Kind regards,
Erin

Erin Holton

Managing Director/Principal Environmental Scientist & Engineer
BEnvSc MEng(Env) CPESC

Suite 904 The Rocket, 203 Robina Town Centre Drive, Robina QLD 4226 | PO Box 4115, Robina QLD 4230
Phone (07) 5578 9944 | Mobile 0433 005 328 | Email holton.el@access.gs | www.access.gs



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From: Scott Benitez Hetherington <SHetherington@tweed.nsw.gov.au>
Date: Thursday, 16 February 2023 at 10:10 am
To: Erin Holton <holton.el@access.gs>
Cc: 'Michelle' <Michelle@mkeh.com.au>, Michael Geale <mgeale@ledaholdings.com.au>, Valerie Conway <VConway@tweed.nsw.gov.au>, GC Office <gcoffice@ledaholdings.com.au>
Subject: RE: Kings Forest - Water quality monitoring suite and sediment basin criteria [12066]

Hi Erin

David Bell has returned to work this week and offered the following response to your request. Please note that David is requesting confirmation that DPE are also supportive of the request.

Valerie – should this be included to the adaptive management log? If so, are you able to arrange for it to be added please?

Kind regards
Scott

Thanks for your e-mail. The attachment and request has been reviewed, with the below comments provided.

Council has no objection to ceasing further monitoring of the nominated analytes recommended by your consultants with the exception of arsenic, cadmium, copper, lead, nickel, zinc and ammonium as these are nominated in 'Dewatering in the Tweed', which is considered an appropriate reference document. Dewatering in the Tweed may be accessed at <https://www.tweed.nsw.gov.au/files/assets/public/documents/development-and-business/development-applications/dewatering-tweed-guideline.pdf>.

Additionally, any request for reduced monitoring should also be supported by DPE.

From: Erin Holton <holton.el@access.gs>
Sent: Wednesday, 18 January 2023 1:10 PM
To: Scott Benitez Hetherington <SHetherington@tweed.nsw.gov.au>
Cc: 'Michelle' <Michelle@mkeh.com.au>; Michael Geale <mgeale@ledaholdings.com.au>; Valerie Conway <VConway@tweed.nsw.gov.au>; GC Office <gcoffice@ledaholdings.com.au>
Subject: Kings Forest - Water quality monitoring suite and sediment basin criteria [12066]

Hi Scott,
Happy New Year. I'm getting in touch with you regarding the current construction phase works at Kings Forest.

G&S prepared a number of the environmental management plans that are currently being implemented at the site including the Overall Water Management Plan (OWMP) which is the subject of this email. We have been liaising closely with the Environmental Officer at the Kings Forest Development, Dr. Michelle Mills, with respect to the broad scope of routine water quality monitoring undertaken at the site in accordance with the OWMP.

Please see attached a letter of correspondence which outlines a proposal to reduce the number of parameters currently analysed by the laboratory. There is no change proposed to the suite of compliance parameters (which is a sub-set of the larger suite), but secondary analytes (such as cations and anions) are proposed to be removed from the routine suite of analyses as these are of little ongoing benefit.

The letter also proposes to revise the OWMP to remove some inconsistencies that have been identified between that document and the site's approved Erosion and Sediment Control Plan (ESCP). The change relates to the discharge criteria for the sites sediment basins to align the requirements of the OWMP with the ESCP and IECA Guidelines.

If this revision is acceptable to TSC we would ultimately make the required changes into both the OWMP and Summary of Management Plans (SOMP) to ensure all documents align.

I'll call your office to discuss.

Kind regards,
Erin

Erin Holton

Managing Director/Principal Environmental Scientist & Engineer
BEnvSc MEng(Env) CPESC

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