



## Department of Primary Industries

OUT16/49421

Ms Sheelagh Laguna  
Industry Assessments  
NSW Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Sheelagh.laguna@planning.nsw.gov.au

Dear Ms Laguna

### **Kurri Kurri Battery Recycling Facility (SSD 7520) Comment on the Environmental Impact Statement**

I refer to the email of 14 November 2016 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant divisions of DPI. Views were also sought from NSW Department of Industry - Lands that are now a division of the broader Department and no longer within NSW DPI. Any further referrals to DPI can be sent by email to [landuse.enquiries@dpi.nsw.gov.au](mailto:landuse.enquiries@dpi.nsw.gov.au).

DPI has reviewed the application and Environmental Impact Statement (EIS) and provides the following recommendations:

- All works to be carried out on waterfront land should be undertaken in accordance with [DPI Water Guidelines for Controlled Activities on Waterfront Land \(2012\)](#)
- Prior to project approval the proponent should:
  - Confirm and clarify the ability of the project design to satisfy riparian buffer widths set out in the above mentioned guidelines.
  - Provide additional detail on the proposal to access water from Swamp Creek including proposed pumping works, potential impacts for construction and operation, and on the ability to purchase the necessary water entitlement in the relevant water source.
- The proponent should prepare a water management plan in consultation with DPI Water to include:
  - Erosion and Sediment Control
  - Stormwater Management
  - Water Balance and Water Management Strategy
  - Water Monitoring
  - Riparian Management
- The proponent should drill and construct a suitable number of monitoring bores (up gradient and downgradient) to establish baseline conditions for the site in accordance with [Minimum Construction Requirements for Water Bores in Australia \(2012\)](#).

- The proponent should install an appropriately designed liner to mitigate impacts to groundwater from the:
  - Flow diversion pit.
  - Stormwater capture basin.
  - Untreated water storage basin.
- The conceptual hydrogeology of the site should be adequately described and sampled for water levels and quality by a suitably qualified and experienced groundwater consultant. A suitable groundwater monitoring program (water levels and quality) is to be included in the Water Management Plan for the site.
- The proponent should capture baseline water quality to determine runoff contamination loads of the first rinse off the site, pre-activity (but post-construction) in both the flow diversion pit and the detention storage. The suite of analytes that should be tested includes those listed within the 'comprehensive analysis' category, excluding isotopes (refer to Figure 1, Attachment B of the EIS).
- The proponent should ensure that the stormwater capture basin has sufficient capacity, at all times, to contain the first rinse volume of runoff water for the site, immediately following a dry period.
- The stormwater capture basin should be continuously monitored by a water level logger. Trigger Action Response Plans should be developed to ensure sufficient capacity to contain the first rinse volume of runoff water for the site.
- The proponent should re-issue maps to a suitable scale, clearly showing the flooding depths and extents, and also a legible map of the surface topography of the site.
- On an annual basis the proponent should sample for the suite of 'comprehensive analytes' in the first rinse off the site within the flow diversion pit and the detention storage. Sampling should coincide with a heavy rainfall event following an extended dry period.
- All water quality results should be compared against the baseline runoff contamination loads from the first rinse and reported within the annual environmental management report (AEMR). The AEMR should include prescriptive detail on the site generated surface water contamination loads following heavy rainfall demonstrating the dissipation efficiency of this load throughout the treatment system.
- At approximately 6 monthly intervals or minimum twice yearly for the first two years of operations and annual thereafter, the proponent should sample for the 'comprehensive analytes' suite in groundwater at the monitoring bores. Results should to be reported within the AEMR showing an assessment against the baseline results and [Australian and New Zealand Guidelines for Fresh and Marine Water Quality \(2000\)](#).

Yours sincerely



Mitchell Isaacs  
**Director, Planning Policy & Assessment Advice**  
 15 December 2016

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<https://goo.gl/o8TXWz>