



OUT17/27286

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

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Dear Ms Masters

**Woodlawn Bioreactor (MP 10\_0012 MOD 2 and DA 31-02-99 MOD 3  
Comment on the modification request**

I refer to your email of 5 July 2017 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant branches of 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 modification request and provides the following comments and recommendations for consideration in assessment of the proposal.

**Comments**

DPI considers that further assessment is required to clarify the current situation and to inform the future remedial actions to comply with the site Environment Protection Licence.

The main risks identified with the activity are impacts of leachate seepage on nearby groundwater users and groundwater dependent ecosystems. To inform future remediation approaches, an ecological risk assessment has been proposed by the specialist consultant engaged by the proponent. DPI supports this proposal and recommends the assessment include third party users and ecosystems in the vicinity.

In addition, the report indicates that the leachate volumes generated and proposed to be pumped are substantial and as such, require authorisation to account for the identified take of water. Licensing action may be required to bring the landfill operation into compliance with water management legislation.

**Recommendations**

- 1 Provide clarification of the method of "rectification of dam integrity" identified in the Aecom Seepage Investigation Report as the consultant within the same document precluded the lining of the evaporation dams (as being complex and cost prohibitive) and discounted the construction of a cut-off trench (due to the depth to groundwater and thickness of the low permeability soils).
- 2 Undertake the proposed risk assessment to better inform the likelihood of adverse impacts having arisen from the historic ongoing seepage from the evaporation dams being investigated.
- 3 Expand the monitoring network to provide superior coverage (spatially and at depth) to the current arrangement so that the ecological risk assessment can be thoroughly

validated as proposed by Aecom. This should occur in conjunction with the risk assessment, as well as the rectification of dam integrity (once the methodology is clarified).

- 4 Consult DPI Water in respect of the ecological risk assessment to ensure the study is sufficiently robust to meet the requirements of the *NSW Aquifer Interference Policy*. The investigation should consider the distribution of groundwater users and dependent ecosystems in the vicinity of the project, as well as the improvements in the monitoring network stated by Aecom to be necessary to validate the risk assessment.
- 5 Provide all historic information (including hydrogeological and geotechnical consultants reports and data) relevant to the project to ensure efficient assessment of any upcoming activities can be undertaken.
- 6 Confirm or seek appropriate licensing arrangements for the Woodlawn Bioreactor as an aquifer interference activity (a project having the potential to contaminate groundwater) and account for the take of water (up to 126 ML/y) by the proposed operations. All take must be licensed with equivalent water entitlement via the allocation of existing licensed entitlement or accessing additional entitlement through trade or controlled allocations.

Yours sincerely



Mitchell Isaacs  
**Director, Planning Policy & Assessment Advice**  
17 August 2017

*DPI appreciates your help to improve our advice to you. Please complete this three minute survey about the advice we have provided to you, here:*

<https://goo.gl/o8TXWz>