



maitland
city council

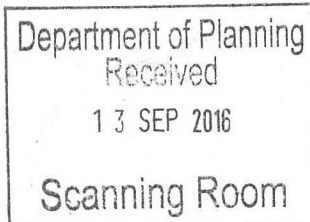
Our Ref: 103/164 (1235800)

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Mark Roser



08 September 2016

Department of Planning and Environment
Industrial Assessments
GPO Box 39
SYDNEY 2001



Att: Kate Masters

Re: Submission to the Exhibition of an EIS for Demolition and Remediation of the former Hydro Kurri Kurri Aluminium Smelter Site

I refer to the exhibition of the EIS for the demolition and remediation of the former Hydro Kurri Kurri Aluminium Smelter Site and provide the following comments as Council's submission to this proposal.

The subject site for the proposed demolition and remediation activities is not within the Maitland Council LGA, however it is considered there is realistic potential for significant environmental impact from the proposal on waterways and wetlands within Maitland.

- There is a significant amount of spent pot linings on site. The EIS notes that they will not be put into the containment cell, but there is no clear decision on what will occur with this material. There is significant potential for further contamination of the site, ground water and surrounding aquatic ecosystem from this material. The EIS needs to address the treatment, storage or removal of this material in a short term time frame.
- The EIS notes the extent of the contamination plume under the current capped stockpile and that this is not moving laterally or vertically. Given the plume is mapped as being on the verge of the floodline, this cannot be assumed to be in a stagnant state during another large flood. The plume extent discussion at 13.2.2.2 notes that it has elevated fluoride, cyanide and sodium concentrations and pH of greater than 9, and the impact following a fate and transport modelling prediction. It should be noted in this section what the risk is in accordance with the ANZECC guidelines.
- A water balance, which is a requirement of the SEARS, should be included in the EIS to understand whether there is any risk of overflows from the dams during the works to Wentworth Swamp.
- Previous sampling results for the rezoning showed that Wentworth Swamp has been impacted by the smelter activities and that following wet weather conditions this impacts are elevated. The EIS does note that occasionally the fluoride level in the swamp is above

the irrigation guidelines. This was raised as a concern in the rezoning process, and it is unclear why the downstream impacts of the smelter is not addressed in the EIS?

- The EIS notes that any leachate or waste water is treated by a water treatment plant prior to release, and given there is an irrigation area but no discussion on where the treated water is released, then it is assumed to be to this area. There is no discussion on the level of treatment that occurs of the water and therefore it is unclear whether we should be concerned about runoff and groundwater infiltration at the irrigation area (there is no discussion on management of the irrigation area, whether it has monitoring undertaken or any concerns of the site). Cyanide levels are not provided in section 13.2.2 in the North Dam. (It should also be noted that the irrigation area is in the flood liable area).
- The containment cell is being constructed in accordance with the EPA's landfill guidelines. However, there is no consideration of groundwater and surface water monitoring of the site, which would be required by the guidelines. The EIS suggests that there will be no leachate generated and that the small amount that may occur will be collected by a sump and either treated or pumped out by a suitably licensed group. There is a number of concerns with this:
 - Dredged dam material is to be placed in the containment cell. This is assumed to be dewatered but weather is a problematic factor.
 - The cap is to be inspected every quarter. If animals dig into the cap the day after the inspection this can potentially be months of moisture that has access to the contained material.
 - It is expected that the clay base will stop any infiltration to groundwater. This is a risky assumption particularly with the amount of geological anomalies in the area.
 - Given the pollutants in question, it would be preferable to have monitoring under and around the containment cell to identify and breaches prior to leachate entering Wentworth Swamps.
- The EIS discusses ownership and the role of the owner who will have the ongoing management of the containment cell. It has been noted that Hydro does not intend to own any land at the end of the process. The EIS does discuss avenues of ensuring that the management of the cell will be undertaken with the passing of ownership to a third party, however it is not clear on what is the final decision as to how this will occur. It needs to be made clear how this will occur early in the project so that this is not lost.

Thank you for the opportunity to comment of the above proposal. Should you require any further information on Council's submission please contact Ian Shillington or Deanne Nelson-Pritchard on 49349700.

Yours sincerely

A handwritten signature in black ink, appearing to be 'DAVID SIMM', written over a circular stamp or seal.

DAVID SIMM

Manager Development and Environment