

Mr Chris Ritchie  
Major Projects - Industry  
Department of Planning  
GPO Box 39  
Sydney NSW 2001

Dear Mr Ritchie

**Re: Pasminco and Incited Consolidated Remediation  
Pasminco (06\_0184 Mod 4), Incitec (08\_0221 Mod 1)**

I refer to your letter (your reference: file:10/21869) requesting the Environment Protection Authority (EPA) review the Environmental Assessment (EA) for the application to amend the approved Pasminco and Incitec remediation strategies. It is noted that the amendment proposes to place all contaminated soil excavated from the Incitec site into an expanded containment cell on the Pasminco site. Your request invites the EPA to make a written submission on the proposal and include any recommended conditions of approval.

The EPA has reviewed the proponents EA and supports in principle the amalgamation of the remediation of the two sites and the necessary design changes to the Pasminco containment cell. We agree that the benefits of the consolidated approach to remediation of the two sites far outweigh any impacts. A major benefit of the proposal will be the elimination of the approved containment cell on the Incitec site and freeing up of that area for productive use. Other benefits include the likely expedition of completion of the remediation of the two sites, elimination of boundary management issues, integrated groundwater management and rationalisation of water, noise and air management and monitoring.

The proposed amendment will necessitate the amendment of various environmental management plans for remediation, noise, air quality, surface water and groundwater monitoring. These changes are not seen as significant and in the case of boundary and off site monitoring of air quality and noise, it will eliminate much of the duplication that currently exists.

Regulation of the remediation works by the EPA on each of the sites under the provisions of the *Contaminated Land Management Act 1997*, will remain in the current format. That regulation consists of a *remediation order* on the Pasminco site and an *approved Voluntary Remediation Plan (VMP)* on the Incitec site. The VMP will require updating by Incitec.

The EPA has already agreed to the combined sites being the subject of auditing by one Contaminated Site Auditor, namely Graeme Nyland. With regard to the long term environmental management of the enlarged cell, the EPA is in agreement with the proposal for it to be dealt with under the current condition 8.8 of the Pasminco remediation project approval. The EPA also notes the commitments made by the applicants in section 3.3.3 of this EA to future ownership and management of the cell.

The EPA has reviewed the *Containment Cell Concept Design* and is satisfied that the major elements of the cell and its future operation and management are little changed by the increased capacity with little or no impact on management of;

- surface water;
- groundwater drainage, leachate collection and treatment;
- landfill gas generation; and
- the capping system.

The landform changes for the cell are not considered significant and the retention of the conservative batter slope of 5(H):1(V) is noted.

The EPA notes the re-calculation for the amended cell design of:

- Settlement
- Slope stability
- Leachate collection system pipe stress and analysis

and the demonstration of acceptability of the amended cell design for each of these matters.

The assessment of the impacts on surface water management from the amalgamation of remediation works on the two sites is noted and that necessary changes to management of surface water have been adequately taken into account.

With regard to groundwater monitoring and management, the EPA is generally satisfied with the Strategy provided in the EA, but will require the detailed Plan as soon as possible for review and approval.


We recommend the following conditions of approval.

- Detail of the design for the amended cell design to be submitted to the EPA for approval.
- The Groundwater Management and Monitoring Plan detailing the pre and post-remediation groundwater monitoring programs and groundwater quality objectives be submitted to the EPA for approval.
- The environmental management plans for
  - Contaminated Sites Assessment and Remediation,
  - Air Quality (dust management),
  - Noise,
  - Waste Soil and Sediments,
  - Water Quality (groundwater and surface water),
  - Traffic
  - Occupational Health and Safetyto be updated and provided to the EPA.

The criteria in the amended environmental management plans to be the basis for revision of the conditions of the amended Environmental Protection Licence (EPL) for the remediation project. The EPA confirms that the Pasminco EPL can be amended such that it encompasses the Incitec site remediation and the Incitec EPL can be concurrently terminated.

If you have any queries regarding the matters discussed in this letter please contact John Coffey on (02) 9995 5621.

Yours sincerely

 26/10/2012

**Erwin Benker**  
**Acting Manager Contaminated Sites**  
**Environment Protection Authority**