



**Department of
Primary Industries**
Office of Water

Mining and Industry Projects
Department of Planning and Infrastructure
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Our ref ER21080
Your ref 09/01516

Attention: Emma Barnet

Dear Emma

Macdonaldtown Gasworks Remediation Project Environmental Assessment (MP09_0145)

I refer to your letter of 20 April 2012 requesting a submission on the Environmental Assessment (EA) for the project proposal. The NSW Office of Water (Office of Water) previously provided responses at the Adequacy Review and the Revised Adequacy Review stages for the proposal.

The Office of Water has reviewed the EA and provides the following comments for consideration:

Comments

Section 3.4.2 of the EA refers to treating groundwater to an acceptable level such that it could be used in operation. The Office of Water in the Revised Adequacy Review submission advised the use of groundwater as an issue due the requirement that new licences are not able to be issued without a water trade within the same groundwater source.

The Office of Water previously recommended the Environmental Management Plan (EMP) provide details on the proposed treatment, use and disposal of groundwater during the project. Section 3.5 of the EA indicates a copy of the Long Term EMP is to be issued to the Office of Water to demonstrate compliance with groundwater licensing. Details on the proposed treatment, use and disposal of groundwater during the project will be required for any licence application.

The EMP refers to the re-injection of groundwater into the sub-surface. These activities require a licence and details need to be provided to the Office of Water.

Section 10.3 of the Remedial Action Plan notes a Groundwater Management Plan (GMP) will form part of the EMP to address risks from ongoing groundwater contamination and the GMP should detail ongoing monitoring required to assess whether the site remedial action is achieving management goals for groundwater (Appendix F). It is noted the Auditor (Site Audit Report) requires additional monitoring wells to be installed as part of the GMP and that the locations and specifications should be developed by an experienced hydrogeologist. The Auditor suggests the wells be installed and monitoring commenced at the earliest opportunity to allow trends in groundwater conditions to be documented. The Office of Water supports these strategies.

Section 6.2.2 notes licences under the *Water Act 1912* will be obtained for all proposed groundwater monitoring wells prior to works commencing and notes any unlicensed wells will either be decommissioned or appropriately licensed prior to the completion of the works (page 69). The Statement of Commitment (SW11) also includes this statement. If unlicensed wells are to be decommissioned this needs to be undertaken in accordance with the Minimum Construction Requirements for Water Bores in Australia (Third Edition).

The suggested contact to discuss water licensing requirements for the project is Wayne Conners, Senior Licensing Officer, Licensing Operations South on (02) 8838 7531 at the Parramatta office. For any other information please contact Janne Grose, Planning and Assessment Coordinator on (02) 4729 8262 at the Penrith office.

Yours sincerely



Mark Mignanelli
Manager Major Projects, Mines and Assessment
24 May 2012