NSW EPA

Our reference: DOC12/51324

Mr Chris Ritchie
Manager – Industry, Major Projects Assessment
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Mr Ritchie

Thank you for the opportunity to provide comment on the Wagga Wagga Gasworks Remediation – Modification Application MOD 4, regarding the treatment and discharge of contaminated groundwater extracted during the proposed remedial works.

The Environment Protection Authority (EPA) provides the following comments regarding the submission:

- The Ammonia concentration of 50,000ug/L which they anticipate achieving after treatment is not acceptable.
- The modelling based on dilution in "the river" is neither a practical nor an acceptable approach.
- There is inconsistency in the report regarding the monitoring of Volatile Organic Compounds (VOCs) and ammonia in air. In section 2.3.2 it is stated that real time monitoring of VOCs and ammonia will occur however Table 6 only proposes weekly sampling of the discharge stream.
- There is inconsistency in the report regarding the air strippers and the removal of ammonia. Sections 2.3.2 that there will be ammonia in the air stripper air stream. Section 3.1 says the there will be a negligible amount of ammonia in being stripped into air.
- The estimate of VOCs in air adds the C6-C9 and the BTEX concentrations together which is incorrect as the BTEX concentration is part of the C6-C9 concentration. This is likely to over estimate the VOC concentration so this may just make the modelling more conservative.
- There is no commissioning proposed for the air emissions and there is no level that they are proposing to meet with respect to VOC emissions.
- Whilst based on the volumes alone an Environment Protection Licence (EPL) is not required, however the licensing system is based on a capacity to treat and therefore an EPL would be required for Contaminated Groundwater Treatment.

The EPA recommends the following:

- Discharge limits are to be those listed in the Water Quality Guidelines, ANZECC, 2000, Table 3.4.1 Trigger values for toxicants at alternative levels of protection - for the protection of 95% of

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freshwater species. With the exception of Ammonia which is to have a maximum concentration of 4mg/L.

- Concentrations in discharge water are to be monitored at a minimum frequency of weekly with analysis to be conducted at a NATA accredited laboratory. With the exception of Ammonia which will be monitored onsite daily and analysis undertaken weekly at a NATA accredited laboratory.

If you wish to discuss the above comments and recommendations please contact the undersigned on 9995 5616.

Yours sincerely

Stephanie Yu. 13/12/12.

STEPHANIE YU
A/Principal Project Officer – Contaminated Sites
Environment Protection Authority