Attachment 2: Public Authority Requirements

Input to SEARs SSD 6666 MOD 1 – Cessnock City Council

Response History

Public Authority Response **Thursday, 11 February 2021 3:53:49 PM AEDT**

Notes:

Dear Sheelagh
Cessnock City Council has reviewed the information associated with SSD 6666 Modification 1. Council has no objection to the modification.
If you have any questions in respect to this matter, do not hesitate to contact me on (02) 4993 4112.
Yours faithfully
Peter Giannopoulos
Team Leader Development Services

OUT21/1370

Sheelagh Laguna
Planning and Assessment Group
NSW Department of Planning, Industry and Environment

sheelagh.laguna@planning.nsw.gov.au

Dear Ms Laguna

Hydro Kurri Kurri Aluminium Smelter Remediation Mod 1- Temporary Water Treatment Plant (SSD 6666)
Comment on the Secretary's Environmental Assessment Requirements (SEARs)

I refer to your email of 3 February 2021 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The following recommendations are provided by DPIE Water and NRAR.

The SEARS should include:

- The identification of an adequate and secure water supply for the life of the project. This includes confirmation that water can be sourced from an appropriately authorised and reliable supply. This is also to include an assessment of the current market depth where water entitlement is required to be purchased.
- A detailed and consolidated site water balance.
- Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
- Proposed surface and groundwater monitoring activities and methodologies.
- Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at https://www.industry.nsw.gov.au/water).

Any further referrals to DPIE Water & NRAR can be sent by email to: landuse.enquiries@dpie.nsw.gov.au.

Yours sincerely

Alistair Drew
Project Officer, Assessments
Water – Knowledge Office
8 February 2021

Our ref: DOC21/68105-10
Your ref: Modification 1 to SSD 6666

Department of Planning and Environment
Industry Assessments
4 Parramatta Square
PARRAMATTA NSW

By Email
23 February 2021

Attention Ms Sheelagh Laguna

Dear Ms Laguna

State Significant Development 6660 – Modification 1 – On Site Water Treatment Plant – Hydro Aluminium Smelter, Hart Road, Loxford

I refer to your email dated 3 February 2021 requesting comment from the Environment Protection Authority (**EPA**) about Modification 1 to SSD 6666 (**the Modification**). The Modification seeks to enable the construction and operation of an onsite Temporary Water Treatment system and associated infrastructure; and to enable discharge of the treated leachate to the existing water management system.

The EPA has reviewed the information provided in the Draft Statement of Environmental Effects (**Draft SEE**) and requires further information prior to supporting the Modification. The EPA's comments are attached to this letter (**Attachment 1**).

If you have any questions about this matter, please contact Kasey Williams on phone 4908 6859.

Yours sincerely,

STEVEN JAMES
Unit Head, Regulatory Operations, Metro North
Environment Protection Authority

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Phone 02 4908 6800
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NSW 2300 Australia
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Attachment 1

A. Surface Water Assessment

The EPA provides the following comments and requests further information so it can adequately assess potential surface water impacts associated with the Modification:

1. There is ambiguity surrounding relevant documentation referred to in the Draft SEE

The Modification Report frequently refers to the EIS or RTS report for additional information.

There are over 50 RTS reports on the Major Projects Planning portal. Given the long history of the project, lengthy documents and multiple revisions, it is unclear what is still relevant (noting EIS water quality data from 2015 no longer represents contemporary data).

2. The current leachate influent quality is unknown

The Modification Report does not characterise the current leachate quality. The most recent characterisation of the leachate appears to be in RTS Appendix 3 - Part 1's Containment Cell Design Report (1046 pages, August 2018) Appendix A Leachate Assessment. The characterisation is limited and based upon two sampling events from 2015.

3. It is unclear if the water treatment plant will treat all pollutants that are at non-trivial concentrations, and what effluent discharge quality will be

The Draft SEE indicates the plant has been designed to treat conductivity, fluoride, cyanide, oils and grease, pH, total suspended solids and total dissolved solids. The applicant provides treatment criteria for these parameters however, no discharge concentrations are provided for conductivity or total suspended solids.

The suitability of the water treatment plant to treat all pollutants at non-trivial concentrations cannot be assessed unless the current leachate influent has been characterised. Historical groundwater reports suggest heavy metals (including aluminium, zinc and nickel), TRH, PAH's are also above the relevant guideline values ANZG (2018).

4. The receiving water quality in the North Dam is not clear

Treated effluent will be discharged to the North Dam. The most recent water quality data in the Modification Report is from 2015. The Modification Report only mentions pH, cyanide and fluoride and it is unclear if the list of pollutants discussed are representative of all pollutants likely to be present at non-trivial concentrations.

The Modification Report indicates that water within the North Dam will be 'reused or irrigated to land in accordance with the EPL'. EPL 1548 contains "Discharge Point 11" (otherwise referred to as 'North Dam' within the RTS) and is permitted to discharge to the 'irrigation area' however there are no water quality criteria assigned.

The RTS Appendix 13 water balance (2018) indicates that the Northern Dam has had uncontrolled overflows three times between 2013-2016. There is no consideration of the potential impacts of these uncontrolled discharges on the downstream environment and whether further management measures are required to mitigate any identified impacts. The downstream receiving environment is Wentworth Swamp, which is mapped as potential habitat to threatened fish species.

The Draft SEE has not demonstrated that the water quality within the North Dam can be sustainably irrigated or considered the potential impacts of uncontrolled discharges to the downstream receiving environment.

5. The water treatment plant management systems are unclear

The Draft SEE does not demonstrate that the leachate storage basins and treated water holding tanks are appropriately sized to contain leachate (such as during heavy rain, the water treatment plant being offline or poor effluent discharge quality).

The EPA recommends that the applicant provides an updated, consolidated report that includes (at a minimum):

- A contemporary characterisation of the influent leachate quality and the receiving water quality within the Northern Dam and downstream receiving environments for all pollutants likely to be present at non-trivial levels.
- The expected discharge quality from the Water Treatment Plant.
- The expected combined discharge quality from the Northern Dam (with the addition of WTP discharge) under a range of operational and climatic scenarios (e.g. wet weather, dry weather).
- An assessment of the potential impact of the proposed discharge (to both land and the downstream receiving environment) with reference to the appropriate guidelines, including but not limited to:
    - Australian & New Zealand Guidelines for Fresh and Marine Water Quality (ANZG (2018)
    - Environmental Guidelines: Use of Effluent by Irrigation (NSW DEC 2004)
- Demonstrates that the water treatment plant systems (leachate storage basins, treated water holding tanks) are appropriately sized.
- A water treatment plant validation monitoring program.
- A soil, surface and groundwater monitoring program that assesses controlled (via irrigation) and uncontrolled overflows from the North Dam.
- The practical measures that will be taken to prevent, control or mitigate pollution including contingencies that will be implemented if WQOs are not met.

B. Groundwater Assessment

The EPA provides the following comments on the potential groundwater impacts associated with the Modification:

- The proponent has not justified that the leachate pond lining construction will be suitable to fully contain the leachate or enable suitable lining performance monitoring. Whilst a 2mm HDPE lining was noted, there is no supporting information demonstrating that this has been tested and found to be adequate to prevent leachate material from infiltrating the lining.
- The location of the proposed infrastructure is appropriate for achieving good environmental outcomes.
- If the ponds were suitably constructed, the rate of disposal or storage of leachate should be adequately managed.
- Any leaks from the pipeline, proposed to be double skinned in areas with the higher potential for impact, or buried under road crossings should be inspected manually and will be covered by existing licence conditions.
- The proponent has proposed weekly inspections of the TWTP, erosion and sediment controls, environment and containment measures, and containment cell transfer pipe. This should be adequate for the management of leachate for groundwater purposes.
- The proponent has proposed a continuation of groundwater monitoring. Though not used as monitoring points on EPL 1548, it is understood that the proponent conducts routine groundwater monitoring separate to the licence.

C. Waste and Contaminated Lands Assessment

The EPA provides the following comments and requests further information so it can adequately assess potential impact from waste and land contamination associated with the Modification:

1. Managing leachate contaminated liquid generated at the premises

The Draft SEE outlines that the "*Temporary Water Treatment System (TWTS) has been designed to manage all the leachate expected to be generated during the Project. Offsite treatment of leachate (as described in the RTS) could still occur if required where volumes may exceed the capacity of the onsite TWTS, such as following or during heavy rain events.*

Leachate within the Containment Cell Leachate Pond would be pumped out and transported to the Leachate Holding Pond via a HDPE pipe when:
- *The pond reaches 85% capacity*
- *A heavy rain event is forecast.*

A surface-laid 100 mm diameter high-density polyethylene (HDPE) pipe would be installed to transfer leachate from the Containment Cell Leachate Pond to the Leachate Holding Pond. The plant is designed to treat and discharge a maximum of 2,400 kL/month.

The modelling indicated that annual leachate generation is predicted to peak at approximately 1,948 kL per month during material placement, through to 3,884 kL in the first year following capping, before reducing to 388 L per year after five years of capping."

Recommendation

The containment cell leachate pond and leachate holding pond do not appear to have been designed using a water balance for the operations. Instead it appears to be event based. It is not clear that the leachate containment and treatment system have enough capacity based on the limited information provided.

Whilst contingencies exist to truck the leachate from the site when the system is not able to contain/process the excess leachate; the system should be designed using a water balance for the proposed operations in accordance with the *Environmental Guidelines Solid Waste Landfills (2016)* and details provided on any anticipated shortfall for onsite containment and treatment.

2. Temporary Water Treatment System (TWTS)

The leachate treatment system outlined in Table 2-1 is expected to remove the identified pollutants in the leachate when managed in accordance with the specifications of the provider.

Recommendation

The proposed treatment system be adopted

3. Leachate Holding Pond construction

The SSD 6666 Modification report outlines that "*the Leachate Holding Pond is to be constructed using validated fill material sourced from the Smelter Site and lined with 2 mm HDPE lining to contain the leachate."*

Recommendation

The limited details provided for the design and construction of the leachate holding pond are not adequate to assess the capacity to contain and manage the leachate generated.

It is recommended that:

- Leachate storage (design, construction and operation) be consistent with the technical specifications outlined in the *Environmental Guidelines Solid Waste Landfills (2016)*

- Before major construction works occur, the proponent prepares a Construction Quality Assurance Plan. This must set out the proposed testing, inspection and other verification procedures to be implemented during construction of the leachate containment works.

- Following construction, the occupier must prepare a Construction Quality Assurance Report on the quality assurance that was implemented to ensure that the works comply with the approved designs and specifications.

4. Transfer pipe installation

The transfer pipe is to be constructed of 100 mm diameter HDPE piping and would be butt welded and surface laid. Where the pipeline is required to cross an access road it would be installed under the road. Where the pipe traverses the unnamed watercourse, it would be double skinned. The proponent has outlined that the integrity of the pipe will be checked weekly.

Recommendation

Transfer pipes are not usually bunded and the required frequency for routine checks is adequate given the temporary nature of the works.

However, the transfer pipe should be pressure tested prior to commissioning to verify that there are no leaks.

5. Monitoring Parameter Suite

The SSD 6666 Modification report outlines that "*Once leachate has been treated, tested and approved for discharge, the water will be pumped into the Eastern Surge Pond and to the Smelter water management system.*"

The proposed monitoring parameters are outlined in Table 2-3.

Table 2-3: Treated Leachate Target Values

Parameter	Units	Limit	Test Method	Frequency of Testing
Conductivity	µS/cm	None specified	Calibrated field meter	Daily
Fluoride	mg/L	15	APHA 4500-F-C	Weekly or minimum of 1 per 40,000 L
Free cyanide	mg/L	<0.005	APHA 4500 CN-O, ASTM D7237	Weekly or minimum of 1 per 40,000 L
Total oils and grease	-	No visual sheen	Visual	Daily
pH	-	6.5-8	Calibrated field meter	Daily
Total Suspended Solids (TSS)	mg/L	None specified	APHA 2540 C	Weekly or minimum of 1 per 40,000 L
Total Dissolved Solids (TDS)	mg/L	<50	Calibrated field meter	Daily

The range of parameters included in the monitoring suite is not expected to cover the expected range of contaminants. For example, the location where the leachate pond is to be sited is the former Anode Waste Pile and is an area of environmental concern containing polycyclic aromatic hydrocarbon (PAH) contamination in surface soils to 0.2 m below ground surface. These soils are to be placed in the containment cell and would therefore contribute to the leachate.

Recommendation

The monitoring suite be broadened to include Poly Aromatic Hydrocarbons, Total Recoverable Hydrocarbons and Heavy metals.

6. Additional Issues

Geotube

The waste sludge generated from the TWTS is to be processed in a Geotube. These tubes can leak, and spills and ruptures can occur.

Recommendation

That the Geotube containing sludge be in placed in a bunded/contained area.

Spent Media

The spent media from the TWTS is to be placed into the containment cell. This will be a concentrated waste stream which is likely to have high concentrations of contaminants.

Recommendation

Confirmation should be provided that the containment cell is suitably designed to manage these wastes.

SEPP 55

The EPA notes that SEPP 55 is not required in Table 3-4 of the Draft SEE and as such can be removed.

Our ref: DOC21/68105-10
Your ref: Modification 1 to SSD 6666

Department of Planning and Environment
Industry Assessments
4 Parramatta Square
PARRAMATTA NSW

By Email
23 February 2021

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If you have any questions about this matter, please contact Kasey Williams on phone 4908 6859.

Yours sincerely,

STEVEN JAMES
Unit Head, Regulatory Operations, Metro North
Environment Protection Authority

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SEPP 55

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Input to SEARs SSD 6666 MOD 1 – Water NSW

Response History

Public Authority Response **Wednesday, 3 February 2021 5:55:05 PM AEDT**

Notes:

Thank you for requesting WaterNSW's input relating to the request for Secretary's Environmental Assessment Requirements (SEARs) for the Modification 1 Temporary Water Treatment Plant. Please note that as the subject site is not located in close proximity to any WaterNSW land or assets, and as an SSD any flood works or licensing approvals will be assessed by others, the risk to water quality is considered to be low and WaterNSW has no comments or particular requirements.