



Your ref: L8949/2016/1

Our ref:

Enquiries: [REDACTED]

[REDACTED]
Bunbury Harvey Regional Council
Stanley Road Class II Putrescible Landfill
51 Stanley Road
WELLESLEY WA 6233

Email to: [REDACTED]

Dear [REDACTED]

ANNUAL ENVIRONMENTAL REPORT (AER) AND ANNUAL AUDIT COMPLIANCE REPORT (AACR) L8949/2016/1 REVIEW. REQUEST FOR INFORMATION.

I refer to the documents submitted to the Department of Water and Environmental Regulation (DWER) 01/02/2022 in accordance with Condition 54 and Condition 55 of Licence L8949/2016/1.

DWER requests further information to clarify matters reported by the Bunbury Harvey Regional Council.

The information provided below is an excerpt of the overall Annual Environmental Report and Annual Audit Compliance Report Review conducted by the Department. Other matters identified in the review are being addressed in the 3 September 2021 Environment Protection Notice 2021/02.

Review comments	
Table 10: Annual Environmental Report	
Condition	Comment
<p>Monitoring of ambient stormwater quality which must include:</p> <p>(a) Data in table format for the annual period</p> <p>(b) Data in graphical format for trend analysis to include at least the last four years data where available</p>	<p>Page 25 of the annual report provides a graph for each pond with all analytes. The graphs have no units. Analytes need to be separate to allow for greater distinction and appropriate scales and units. Trends cannot be determined with the data presented in its current form.</p> <p>Evidence of sample analysis at a NATA accredited laboratory not included within the AER.</p> <p>Surface water</p> <ul style="list-style-type: none"> - resubmit surface water time series graphs, separated as detailed below: <ul style="list-style-type: none"> ▪ pH (no units) ▪ EC (µS/cm) ▪ TOC (mg/L)

Review comments	
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	<ul style="list-style-type: none"> ▪ TSS (mg/L) ▪ COD (mg/L) ▪ TN, Nitrate – nitrogen, Ammonia-Nitrogen, TP (mg/L) ▪ Cations and anions (mg/L) ▪ Metals (mg/L) <p>Further explanation of groundwater data variability required. DWER notes that rainfall has been average for the past two years.</p> <p>Structural integrity of SQ16S should be checked. If there is no issue with the structure of the bore, suitability assessment of the bore must be undertaken, and a replacement bore installed.</p> <p>The Bunbury Harvey Regional Council must resubmit the AER with data in the format specified above.</p>
<p>Monitoring of ambient groundwater quality which must include:</p> <p>(a) Data in a table format for the annual period</p> <p>(b) Data in graphical format for trend analysis to include at least the last four years data where available.</p>	<p>Calibration report provided in Appendix D of <i>2021 Annual Groundwater Monitoring Report: Stanley Road Waste Management Facility CW1050900</i> (Cardno now Stantec, 2022)</p> <p>February sampling – Quarterly report from the lab did not provide QA/QC information. Page 20 is missing. Relative percentage difference (RPD) was high in many samples, indicating possible issue with sampling method, holding, or handling time. No explanation provided. Raw laboratory RPD not provided.</p> <p>May Sampling – Quarterly report from the lab did not provide QA/QC information, and RPD was high in many samples indicating a potential issue with sampling method, holding, or handling time. No explanation provided. Raw laboratory RPD not provided</p> <p>September Sampling - Quarterly report from the lab did not provide QA/QC information and RPD was high in many samples indicating possible issue with sampling method, holding, or handling time. No explanation provided. Raw laboratory RPD not provided</p> <p>November sampling – no method blank value, no duplicate, no control. Matrix spike and surrogate recovery outliers exist. No analysis holding time outliers exist, quality control sample frequency outliers exist. Original RPD assessment from laboratory provided. RPD within acceptable limits.</p>

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	<p>The leachate pond monitoring bore GQ19 has been persistently dry.</p> <p>Licensee is to confirm the integrity of this monitoring bore and replace if compromised. If there are no structural issues with the bore, reassessment of suitability of the location must be undertaken.</p> <p>Groundwater:</p> <ul style="list-style-type: none"> - Please provide explanation for groundwater QA/QC data integrity issues, particularly RPD. - Request submission of groundwater data in a time series graphs. Data should be presented on multiple graphs as detailed below. <ul style="list-style-type: none"> ▪ pH (no units) ▪ EC (µS/cm) ▪ Redox potential (Eh) ▪ COD (mg/L) ▪ TOC(mg/L) ▪ DO, Dissolved Methane (mg/L) ▪ TDS (mg/L) ▪ Nutrients (mg/L) ▪ Major cations and anions (mg/L) ▪ Heavy Metals (mg/L) ▪ Organics (mg/L) - Standing water level graphs to be resubmitted with Deep, Intermediate and Shallow bores on separate graphs
<p>Monitoring of ambient landfill gas which must include:</p> <p>(a) Data in a table format for the annual period</p> <p>(b) Data in graphical format for trend analysis to include at least the last four years data where available</p>	<p>Gas – Installed by Run Energy. As-constructed logs provided in #A1702311.</p> <p>No evidence that the data reported has been interpreted by a specialist consultant. Calibration certificates not included.</p> <p>Gas monitoring data should be displayed with analytes on separate graphs, appropriate scales and timeseries data as required by Table 10 of License L8949/2016/1.</p> <p>In summary, data is not properly tabulated, and graphs on scales too large to identify trends between the separate gases. Large numbers of flow rate data absent. Bunbury Harvey Regional Council must resubmit AER with further explanation and appropriate display and resolution of data.</p>

DWER requests a response and resubmission of the AER and AACR within **twenty-one (21) days** of the date of this letter.

For questions regarding this matter please contact [REDACTED] or [REDACTED]

Yours sincerely

[REDACTED]