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Our ref: JC/lc/ECM 28448

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Date: 18 November 2020

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David Robinson
Project Manager Approvals
EPA Victoria
GPO Box 4395
Melbourne VIC 3001

Dear David

**RE: APPLICATION FOR WORKS APPROVAL 1004143
Cleanaway Solid Waste Pty Ltd - Composting Facility
Lot 1 PS428264, Parish of Mildura
428 Magnum Avenue Koorlong Vic 3501**

Thank you for your correspondence received on 5 November 2020 with regards to the above Works Approval.

Key matters for consideration are;

- drainage of leachate contaminating soil and ground water
- dust contaminating surrounding sensitive vegetation
- containment of leachate and contact water in the event of a spill or over capacity event

I note the request from the EPA was to advise on *the management of surface water and groundwater and control measures proposed to ensure there is no adverse effects on the values of the catchment or nearby wetlands* associated with the Cleanaway Solid Waste P/L Works Application.

It would appear from the documentation available on line, the proponent has considered the areas of groundwater and stormwater risk and generally designed the facility infrastructure to address these risks. In general terms, the proposed measures would appear adequate. The following further matters are recommended for consideration.



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Groundwater monitoring

It is noted that 3 groundwater monitoring bores presently exist on site and a further 3 monitoring bores are proposed for installation within the boundary of the facility.

The siting of the proposed bores should consider the following:

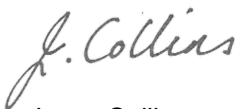
- The depth of the existing bores, and whether they monitor the Parilla Sand aquifer or a shallow groundwater (perched) aquifer is unclear. It is recommended the lithology of the existing bores be considered to determine whether there is a risk of a shallow groundwater (perched) aquifer developing. In such a situation the groundwater drainage from the site may not move vertically through the soil profile, but could become perched and move laterally.
- Depending on the characteristics of the subsurface geology and presence (or absence) of a retarding layer (i.e. Blanchetown Clay) it may be appropriate to have some bore monitoring for development of a perched aquifer. Additionally, it may also require some bores to be located outside the property boundary in the direction of preferential groundwater flow.
- It is noted that the bores will be monitored annually. Given the seasonal rainfall pattern in the Mallee it is recommended that biannual (twice yearly) monitoring be considered.

Surface Water

It is noted the proposed facility will have two distinct catchment areas based on Clean Water Storage and Contact Water Storage. This is also supported with a shallow perimeter bund. Such measures seem appropriate for the type of proposed operation. Ensuring there are operational procedures and staff induction and training consistent with management procedures and the Contact Water Corrective Actions, will be critical to ensuring the facility is operated in accordance with design and controls.

Should you have any queries, please do not hesitate to contact James Kellerman, General Manager Operations and Community, on (03) 5051 4377. To assist the Mallee CMA in handling any enquiries please quote **MCMA-F-2020-00069** in any correspondence with us.

Sincerely



Jenny Collins
Chief Executive Officer