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PLEASE QUOTE

YOUR REFERENCE:

OUR REFERENCE: JD:YM YM201806111645

ENQUIRIES TO: John Dearlove, Coordinator Environmental Services

12 June 2018

Department of Environment and Science
Northern Region – Cairns
PO Box 7230
CAIRNS QLD 4870

Attention: Mr Mark Cavicchiolo
Compliance Delivery Manager, North Queensland Compliance, Environmental Services and Regulation, Department of Environment and Science

Dear Sir

Compliance Inspection – Waste Disposal – Goondi Bend Landfill – 21 March 2018

Thank you for your letter dated 22 May 2018 and assistance provided to Council staff during and following the compliance inspection.

s.73

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In response to items contained within Table 1 alleged non compliances and Table 2 areas of concern the following advices are provided for your consideration.

Table 2 – Areas of Concern
Issue1.
Notice of notifiable activity:

Chapter 7 Part 1 Division 2, Section 320 Environmental Protection Act
Council is required to give written notice for the notifiable activity of landfilling at the site.

Description – Lot 28 on CP845192 is not currently listed on the Environmental Management Register (EMR) for the notifiable activity of landfilling.

Response – Council was unaware that written notification regarding activities which had occurred for considerable time at the site had not been appropriately made to the Department. Please receive attached completed notification and supporting information in electronic format reference Items 2.1 and 2.2.

CASSOWARY COAST REGIONAL COUNCIL
Address all correspondence to the Chief Executive Officer.
PO Box 887, Innisfail Q 4860 T: 1300 763 903 F: 07 4061 4258 E: enquiries@cassowarycoast.qld.gov.au W: www.cassowarycoast.qld.gov.au
OFFICE LOCATIONS: Innisfail: 70 Rankin Street Tully: Civic Centre, 38-40 Bryant Street

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Issue 2.
Environmental Authority Amendment and Post Closure Care:

Section 319 Environmental Protection Act – Administrative matters with the Environmental authority.

Description - A review of Department of Environment and Science historical files could not locate any records of final closure and or licence surrender for the closed landfills of Goondi Bend s.73
Response - Staff are searching Councils system for historical records across Health, Planning, Environment and Engineering departments in order to commence collation and submission of required data. It is envisaged this will take several weeks due to the complexity with records and database searching, staff changes, engaged consultants works and the extended time periods from the mid 1990's for operation, closure and capping.

What appears evident is that when staff applied for integration of existing licenced activities within Permit EPPR01428213 consideration may not have been given for Goondi Bend s.73 landfills due to the understanding these had both been previously closed in 1999 and advices provided to the Department. As you are aware both these sites remained closed for landfill operations from 1999 until it was necessary to reutilise sites during response works to Cyclone Larry during 2006/2007.

Goondi Bend Landfill Closure
It is evident that LDI Constructions undertook landfill closure works under Contract T2009-003 during 2009/10 with completion in February 2010. Tender specifications are attached as Item 2.3. These works were guided by Golders Goondi Bend Landfill Closure Design documentation of 2008 attached as item 2.4. Details of the Closure works claim summary from LDI are also attached as Item 2.5 for your information. Investigation with Councils engineering department staff who project managed the works is being pursued to obtain further information.

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Further to identifying and finalising required post closure care, maintenance and monitoring for these sites, staff have implemented works to ensure Councils general environmental duty obligations are effectively occurring.

Table 1. Alleged non-compliances
Issue 1.
Proper landfill cap not installed:

Condition - A1G2 and A1G8 Section 430 Environmental Protection Act – Council is required to ensure all waste disposal areas at the site have been capped to specification.

Description - The Department has no evidence of installation of the final landfill cap.

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Response - LDI Constructions undertook landfill closure works under Contract T2009-003 during 2009/10 with completion in February 2010. These works were guided by Golders Goondi Bend Landfill Closure Design documentation of 2008. Details of the Closure works claim summary from LDI and Golders design criteria are forwarded electronically for your information.

Issue2.
Post closure care of the landfill

Condition A1G9 – Council is required to ensure post closure care of the landfill for a period of 30 years and that no release of waste materials, leachate, landfill gas or other contaminants to the environment is likely.

Description - Post closure care of the site has not been occurring over recent years in accordance with the post closure care plan.

Response - An assessment of various Council records is being undertaken to provide the department with evidence of inspections, environmental monitoring and remedial works undertaken since 2010. Due to the complexity involved with retrieval of information from Councils databases across several departments over significant time it is envisaged that obtaining details will be finalised by 29 June 2018.
Further to identifying and finalising required post closure care, maintenance and monitoring works for the site, staff have implemented works to ensure Councils general environmental duty obligations are effectively occurring.

Details of environmental monitoring are included within response details for issue 7 Ground water monitoring and issue 8 surface water monitoring.

Issue 3.
Site management plan

Condition - A1G10 Section 430 Environmental Protection Act – Council is required to submit a site management plan (SMP) to the administering authority.

Description - No Site Management Plan has been developed and provided to the administering authority.

Response - Due to the existence of monitoring conditions for a closed landfill in the Site Based Management Plan (SBMP) for Goondi Bend attached as Item 1.1 within Councils IEMS it is understood that staff were following its contents as opposed to applying new licence conditions as per IPDE00543607A11. Staff consider that this SBMP would have been provided in the late 1990's to the Department within the IEMS that was developed at that time.

In early 2018 Council engaged Aecom Pty Ltd to review and update all site based management plans for waste facilities. A draft Aftercare Management Plan (AMP) attached as item 1.2 has since been received for the Goondi bend Landfill and is under review by staff to ensure all known aspects of the old SBMP, post closure care, maintenance and monitoring have been included prior to finalisation.

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Included within the AMP are provisional cost estimates which have been used to allocate funding provisions for inclusion to Councils broader Legacy Landfills Aftercare Management Plan. This also includes six former landfill sites. It is expected the draft AMP for Goondi Bend Landfill will be finalised by 29 June 2018. In the interim a draft copy is attached for your information.

Issue 4.
Landfill gas monitoring

Condition - A1A3 Section 430 Environmental Protection Act – Council is required to undertake landfill gas monitoring every three months.

Description - No gas monitoring records have been provided to the administering authority.

Response - Records for gas monitoring have been obtained from Council archives which indicate that sampling at four (4) sites attached as Item 1.3 was undertaken between 2003 and 2006 for the parameters of methane, carbon dioxide, carbon monoxide, hydrogen sulphide and oxygen. Nil to minor detections only were noted. Details are provided in electronic format via excel spreadsheet for your records.
Further gas testing records have also been found for testing undertaken during 2010 to 2013 for between seven (7) and ten (10) sites for the parameters of methane and carbon dioxide. Nil detections were generally noted at all sites with the exception of minor readings (0.1) for carbon dioxide at sites 1 and 2 in May 2012 and February 2013. Field reports and photographs are provided in electronic format separate to this letter.

Staff have included the requirement for gas monitoring within Councils sampling specifications document which is currently being finalised. Once complete quotations for undertaking Councils overall suite of sampling works will be advertised. It is expected the resumption of gas sampling will commence in early July 2018 however based upon historical findings of nil detections it is requested that subject to future results this requirement for sampling be reviewed.

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Issue 5.
Discharge point surface water monitoring

Condition - A1W4(b) Section 430 Environmental Protection Act – Council is required to undertake monthly monitoring of discharged waters for the prescribed parameters at the authorised release point.

Description - Department records indicate some records have been provided with the last monitoring undertaken on 30 July 2012.

Response -Preliminary review of Council and SGS databases indicates that sampling at the authorised discharge point G4 and sites G1, G2, G3 Item 1.4 have been undertaken from 2012 until 28 October 2014. For site G4 this includes four (4) samples in 2013, nine (9) in 2014 and a suite of samples also arranged in April 2018. This and Council records are being investigated to ascertain if any database or filed field data sheets of sampling undertaken from 2014 is available.

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Review of available results within Item 1.5 and 1.7 indicates general below threshold limits for quality characteristics at the site and that there does not appear to be any adverse changes with water quality and determination of contaminants releasing. However increases to levels in the Herbicides and Pesticides parameters have been detected in the latest sample results.
It has also been identified that some parameters were not being tested, whilst others not required were being tested along with inadequate frequency of sampling.

Staff are implementing a program to ensure the full suite of sampling is undertaken for this and other sites at the required frequency across all parameters. This is scheduled to commence from July 2018. A copy of the specifications for required sampling, parameters, frequency, locations and sites is attached for your records and review Item 1.8. Your compliance advices and review of departmental requirements with the applicability to proposed details of the sampling program would be appreciated to enable effective implementation.

Issue 6.
Contaminant release to surface waters

Condition - A1W8 Section 430 Environmental Protection Act – Council is not permitted to release contaminants other than settled /treated stormwater runoff waters from the site to surface waters.

Description - DES sample obtained from site G3 indicated that waters being released contained contaminant concentrations for several parameters.

Response – Site G3 and G4 have results available for comparison. G4 is the sites authorised discharge point testing location. From available results sites G1, G2, G3 and G4 have not shown any exceedances with the exception of recent sampling at G4 in 2018 whereby some elevated levels have been detected for Herbicide and Pesticides parameters.
Staff intend to conduct sampling at each of these sites to determine more recent levels in order to establish threshold parameters and for further consideration toward future frequencies and parameters for of sampling.

Issue 7.
Groundwater monitoring program

Condition - A1W10 Section 430 Environmental Protection Act – Council is required to undertake groundwater monitoring at the sites listed and for the parameters specified at least every three months with assessment and submission of results to be provided to the Department.

Description - No recent notifications regarding groundwater results have been received by the Department.

Response - Preliminary review of Council and SGS databases Items 1.5 and 1.6 indicates that sampling has been undertaken at sites GB, GD, GE, GF in January 2014 for ten (10) of the required parameters, Sites GB and GC in September 2014 for eight (8) parameters, sites GD and GE in September 2014 for seven (7) parameters, site GF in

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September 2014 for eight (8) parameters. Sites GB, GC and GG were also sampled for eight (8) parameters in April 2018.
Review of available results (attached electronically) indicates general below threshold limits for quality characteristics at the sites and that there does not appear to be any adverse changes with water quality and determination of contaminants releasing.

Staff consider that further sampling has been undertaken with continued investigation of records and databases being required to confirm available details. Preliminary details in electronic excel spreadsheet format can only be provided presently as further system and database investigation occurs to source and extract details.

Issue 8.
Surface water monitoring

Condition - A1W11, A1W12, A1W13 Section 430 Environmental Protection Act - Council is required to undertake surface water monitoring at the sites listed and for the parameters specified at least every three months with assessment and submission of results to be provided to the Department.

Description - Department records indicate some records have been provided with the last monitoring undertaken on 30 July 2012.

Response - Preliminary review of Council and SGS databases indicates that sampling has been undertaken at sites G1, G2, G3 and G4 up until 28 October 2014 Items 1.4 and 1.6 A further sample was obtained in April 2018. Available details are provided in electronic format for your records.

Review of available results (attached electronically) indicates general below threshold limits for quality characteristics at the sites and that there does not appear to be any adverse changes with water quality and determination of contaminants releasing. The exception being at site G4 whereby increases to levels in the Herbicides and Pesticides parameters have been detected in the latest sample results.

Issue 9.
Continued water monitoring and annual report submission

Condition - A1W14 Section 430 Environmental Protection Act – Council is required to continue water monitoring for thirty years post closure of the site, collate results and submit an annual report to the administering authority.

Description - No annual monitoring reports have been received by the Department in the last eight years.

Response - Staff have continued searching Councils system for any previous annual reports for comparative purposes in order to commence collation, review and submission of required data. Registration to access the sampling database contained by SGS in Cairns has been made to access Councils environmental samples from 2013. Given the complexities of data retrieval and interpretation staff are working with an Information Technology specialist to source, format and correlate the information. Presently the overall span of data available extends from 1999 to 2018 however it is spread across several systems.

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The eventual correlation into spreadsheets of site and sample specific locations, by date and matching data with parameters enables easier review of this extensive information between stakeholders.

All presently known data for the Goondi Bend site is being provided electronically with this letter due to size and complexity, complete with graphs and reporting options. Data for all sites also accompanies this. An update to the data will be provided once databases have been fully reviewed and all details extracted as there is a few anomalies to be worked through with data migration.
A live database is also being developed to enable more timely reporting of data, evaluation, review and comment between Council, consultants and Department of Environment and Science staff.

Council is committed to ensuring all environmental obligations and public health risks are fully addressed at all facilities and that any potential risks to groundwater are identified and managed. My staff look forward to working with your department to identify any further issues, rectifying all noncompliance issues, areas of concern, data review and technology investigation. Councils Environmental Services Coordinator John Dearlove is the contact for any waste queries and will keep your department informed with updates to progress.

My appreciation is extended for bringing these matters to Councils attention and for the time and assistance afforded by your officers.

Yours faithfully

sch4p4(6) Personal information

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WIN HAMMOND
ANAGER REGULATORY SERVICES

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Electronic attachments supporting this letter:

- Item 2.1 Notifiable Activity Form
- Item 2.2 Goondi site map
- Item 1.5 Data graphs June 2018
- Item 1.4 Goondi environmental monitoring sample sites
- Item 1.2 Goondi aftercare management plan
- Item 1.1 Goondi SBMP 2002
- Item 2.5 LDI claim summary Goondi closure works
- Item 2.4 Goondi closure plan - Golders
- Item 2.3 Goondi closure technical specifications tender T2009-003
- Item 1.8 Environmental water quality monitoring specifications
- Item 1.3 Goondi gas sampling results
- Item 1.6 Historic Ground water sample results
- Item 1.7 Historic Surface water sample results

From: Hammond, Gavin
To: Dearlove, John
Subject: FW: Written notice of a notifiable activity
Date: Tuesday, 12 June 2018 2:13:39 PM
Attachments: Item 2.1 EMR Notifiable activity.pdf
Item 2.2 Goondi map.pdf

Regards,

Gavin Hammond | Manager Regulatory Services | Cassowary Coast Regional Council
PO Box 887, Innisfail Qld 4860 | T 07 4043 8839 (Innisfail) 07 4043 9139 (Tully) sch4p4(6) Persona
sch4p4(
E | gavin.hammond@ccrc.qld.gov.au W | cassowarycoast.qld.gov.au

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From: Hammond, Gavin
Sent: Tuesday, 12 June 2018 2:13 PM
To: 'emr.clr.registry@ehp.qld.gov.au'
Subject: Written notice of a notifiable activity

Can you please manage this request.

Regards,

Gavin Hammond | Manager Regulatory Services | Cassowary Coast Regional Council
PO Box 887, Innisfail Qld 4860 | T 07 4043 8839 (Innisfail) 07 4043 9139 (Tully) | sch4p4(6) Perso
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E | gavin.hammond@ccrc.qld.gov.au W | cassowarycoast.qld.gov.au

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From: Hammond, Gavin
To: TRELOAR Kirstie
Cc: Dearlove, John
Subject: RE: Post Compliance Inspection letter - Goondi Bend Landfill
Date: Tuesday, 12 June 2018 4:42:31 PM
Attachments: image001.png
image002.png
image003.jpg
118061216422400983.jpg
DES response letter June 2018.pdf
FW Written notice of a notifiable activity.msg

Kirstie

Further to your email of the 22nd May.

I have attached a letter of response and a link to a large number of files that will provide evidence of our work.

https://cassowarycoast-my.sharepoint.com/:f:/g/personal/jordan_crawford_ccrc_qld_gov_au/EnxHNyS_w3tEhsP3zmpYm4gBc4EeBKJKRlnVNgoAMKJKag?e=Qp2nR9

If I can assist any further with the queries you raised, please don't hesitate to call.

Regards,

Gavin Hammond | Manager Regulatory Services | Cassowary Coast Regional Council
PO Box 887, Innisfail Qld 4860 | T 07 4043 8839 (Innisfail) 07 4043 9139 (Tully) sch4p4(6) Personal i
E | gavin.hammond@ccrc.qld.gov.au W | cassowarycoast.qld.gov.au

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From: TRELOAR Kirstie [mailto:Kirstie.Treloar@des.qld.gov.au]
Sent: Tuesday, 22 May 2018 12:07 PM
To: Hammond, Gavin <Gavin.Hammond@ccrc.qld.gov.au>; Dearlove, John <John.Dearlove@ccrc.qld.gov.au>
Cc: QUICK Calvin <Calvin.Quick@des.qld.gov.au>
Subject: Post Compliance Inspection letter - Goondi Bend Landfill

Hi Gavin and John,

Please find attached departmental correspondence regarding the recent compliance inspection of Goondi Bend Landfill. Attachment 3 has been sent by separate email to John Dearlove.

Kind regards,

Kirstie Treloar
Senior Environmental Officer (Compliance)
Minerals and North Region Compliance | Environmental Services & Regulation
Department of Environment and Science
P 07 4222 5212
Level 3, 5B Sheridan Street , Cairns QLD 4870
PO Box 7230, Cairns , QLD 4870

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