



# HELENSBURGH WASTE DISPOSAL DEPOT ANNUAL REPORT 2024

For EPL 5861 (July 2024)

WOLLONGONG CITY COUNCIL (WASTE SERVICES)



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# 1 Background

Wollongong City Council (WCC) maintains the former Helensburgh Landfill (the site), which is located at Nixon Place, Helensburgh NSW. The site ceased operation in 2012 and no longer receives waste with site activities limited to maintenance, upkeep and environmental monitoring. The site is legally identified as Lots 621 and 915 DP 752033 with the site boundary illustrated in **Figure 1**.

WCC holds Environmental Protection Licence 5861 issued by the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act). The licence authorises the scheduled activity of waste disposal (application to land) at the site with no limit on the scale of activity.

A *Landfill Environmental Management Plan* (LEMP) was prepared in 2008 (GHD 2008) on behalf of WCC to ensure that environmental compliance is maintained throughout the site and following closure. The management measures provided in the LEMP were developed in consideration of the *NSW Environmental Guidelines: Solid Waste Landfills* (EPA 1996) and also addressed the monitoring and reporting requirements of EPL 5861. The *NSW Environmental Guidelines: Solid Waste Landfills* (EPA 1996) were superseded in 2016 and replaced with the *NSW Environmental Guidelines: Solid Waste Landfills, Second Edition* (EPA 2016).

The site is in a maintenance and closure phase and, as such, a revised LEMP is not considered necessary in response to the updated *Environment Guidelines* (EPA 2016). However, in December 2021 an updated Operational and Maintenance Plan was completed.

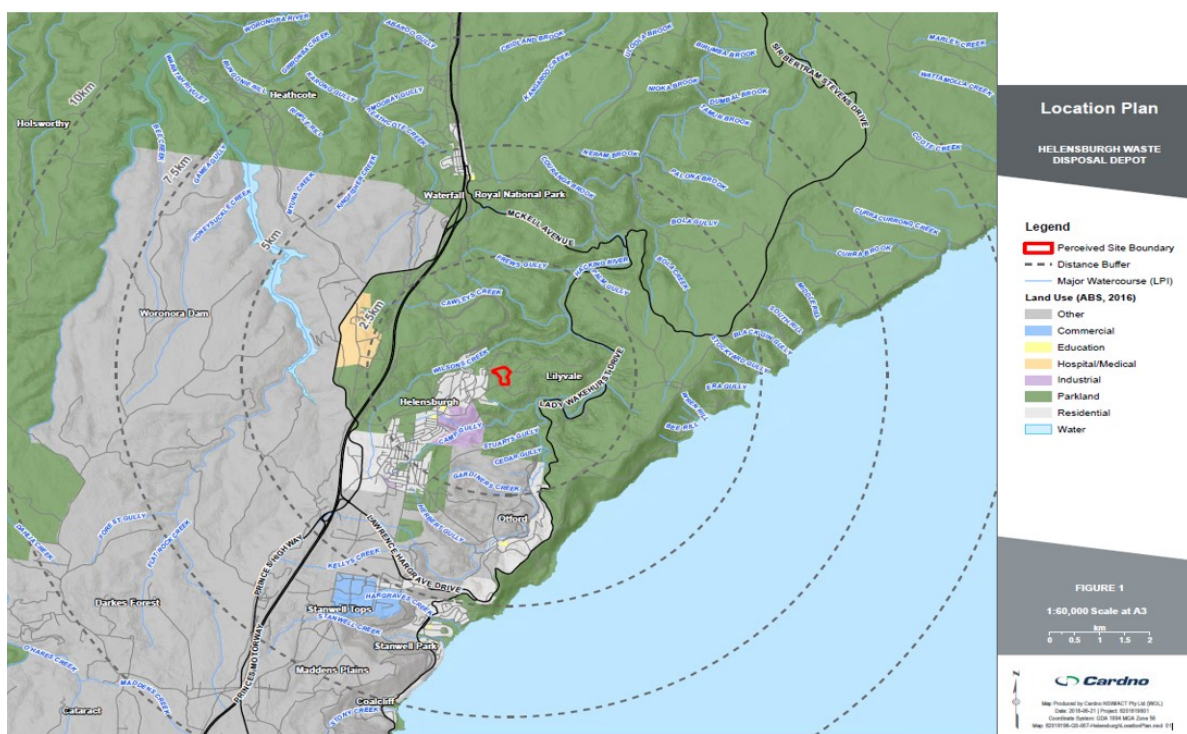


Figure 1: Helensburgh Location Plan

## 1.1 Objectives

The objectives of this Annual Report are to provide the EPA with the following:

- A summary of pollution monitoring data gathered during the reporting period of the 29<sup>th</sup> May 2023 to the 28<sup>th</sup> May 2024.
- Interpretation of monitoring data to assess the environmental performance of the site for compliance with conditions of the EPL.

## 1.2 Scope

### 1.2.1 Fieldwork

To meet the objectives of the Annual Report, the following scope of works was undertaken during the reporting period in accordance with the requirement of the EPL:

- Surface gas monitoring at areas where intermediate or final cover has been placed;
- Subsurface gas monitoring of the seven gas monitoring wells;
- Collection of surface water samples at the three surface water monitoring points;
- Collection of groundwater samples from eight existing groundwater monitoring wells; and
- Monitoring of trade wastewater at one sampling point located at the pre-treatment discharge.

### 1.2.2 Reporting

Section 6 (R1) of EPL 5861 states that an Annual Return and an Annual Report must be prepared by the license holder.

In accordance with Section 6 (R1.8) of the EPL, this Annual Report provides an assessment of environmental performance relevant to the license conditions including:

- Tabulated results of all monitoring data required to be collected by this licence;
- A graphical presentation of data from at least the last three years in order to show variability and/or trends;
- An analysis and interpretation of all monitoring data;
- An analysis of, and response to, any complaints received.
- Identification of any deficiencies in environmental performance identified by the monitoring data, trends or incidents, and of remedial action taken, or proposed to be taken to address the deficiencies; and
- Recommendations on improving the environmental performance of the facility.

This report has been prepared in accordance with the reporting conditions provided in Section 6 of the EPL and in consideration of the *NSW Environmental Guidelines: Solid Waste Landfill, Second Edition* (EPA 2016) *Requirements for publishing pollution monitoring data* (EPA 2013).

## 2 Site History

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The LEMP (GHD) provides the following information in relation to the historical site use:

- *Prior to establishment of waste disposal operations, the site was vacant bushland.*
- *In the years the site operated as a 'trench and fill' operation, with a significant amount of waste burned within the trenches.*
- *It is understood that from the 1960's until approximately the early 1990's, the site operated as a sanitary depot accepting mainly nightsoil and putrescible wastes. Limited environmental controls were in place at this time. The site continued to accept these types of wastes until 1991, when putrescible waste ceased to be accepted at the site.*
- *Since 1991, the site has only been permitted by Wollongong City Council to accept 'Class 2' style wastes e.g. furniture, wood, paper, plastics, etc.*
- *Following the completion of the 'trench and fill' operations, landfilling operations shifted to 'land raise' operations which involved the construction of a small hill created from the deposited waste materials. Filling operations constituted 'land raising', which overtop previously landfilled waste in the site's central southern area.*
- *Material used for daily covering of the waste was obtained from clean fill materials delivered to the site.*

### 2.2 Topography and Drainage

The site is situated on the upper slopes of a hill on the northern eastern most outskirts of the suburb of Helensburgh. The gradient of the site slopes towards the north and east in the direction of the adjoining Garrawarra State Conservation Area. The final form of the landfill is mounded with a slight to moderate radial grade in all directions toward the site boundary.

An elevation profile was created utilising an aerial image taken in December 2021 from Nearmap which shows that the lowest elevations of the site are located in the eastern portion with an approximate relative level (RL) of 190 m Australian Height Datum (AHD). The highest elevations are located at the centre of the site at the location of the former waste deposition area with an approximate RL of 210 m AHD.

Approximate surface contours are shown on **Figure 2**.





Figure 2: Monitoring Site Locations

## 2.3 Soil and Geology

The site is situated within the Sydney Basin and sits atop the Illawarra Escarpment. The natural geology beneath the site is part of the Cumberland Sub-Group of the Illawarra Coal Measures, which are Permian in age. A review of the 1:100,000 geological map 'Wollongong-Port Hacking' (Department of Mineral Resources, 1985) situates the site on Hawkesbury Sandstone, which is characterised by medium to coarse grained quartz sandstone with very minor shale and laminate lenses, which is generally consistent with soil observations noted during a previous intrusive investigation completed by GHD in 2008.

Test pitting completed by GHD (2008) as part of the LEMP suggests that the near surface natural geology of the area is as follows:

- Orange brown clayey Sand overlying;
- Orange mottled clayey Sand overlying;
- White clay Sand with red mottled Laterite (Ironstone) with clay Sand overlying;
- White loosely cemented Sandstone (assumed to be regional bedrock).

GHD noted that the thickness of residual soil was between 2.5m and 4m before bedrock was encountered. According to Council areas of the Site that were historically used for deposition of waste have been capped with virgin excavated natural material (VENM), a material type as defined by the NSW EPA, with a nominal thickness of 0.3m, however, earthworks at the Site since closure showed a capping thickness up to 3.0m.



## 2.4 Hydrogeology

### 2.4.1 Groundwater

Groundwater monitoring data has been collected from the Site since September 1996. Historical gauging of groundwater levels indicates that the local aquifer typically ranges from 1.5m to 4.5m below ground level (mbgl). Groundwater is inferred to flow from the west to north easterly direction towards the Hacking River. A desktop study is currently underway to review groundwater movement onsite.

A groundwater bore search included in the LEMP (GHD 2008) indicates the presence of five registered groundwater wells within a 5 km radius of the Site. The registered uses of these bores are for domestic stock purposes.

### 2.4.2 Surface Waters

The LEMP (GHD 2008) identified a spring beneath the Site, which is understood to feed surface water to a stream east of the site that discharges to the Hacking River, located approximately 400 metres to the southeast.

All surface water runoff from the landfill is collected by a water collection system around the perimeter of the Site that drains to three stormwater ponds located along the eastern boundary of the Site.

## 2.5 Climate

Climate data for the Site was obtained from the nearby Bellambi Bureau of Meteorology (BOM) Weather Station (ID 068228). The weather station is located approximately 20 km south of the Site at the base of the escarpment. This data is considered to be a reliable representation of the Site conditions during the reporting period.

**Table 1-1** summarises the key climatic data from the Bellambi weather station.

Table 1-1 Climatic Data – Bellambi Weather Station

	2023							2024				
	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
Rainfall (mm) <sub>1</sub>	7.6	10.2	123	69.2	30.2	123	201	58.2	126.2	63.2	251	216
Mean max temperature (°C) <sub>1</sub>	18.4	19.2	18.7	22.1	22.9	21.6	18.6	25.9	25.7	24.9	22.1	19.2
Mean min temperature (°C) <sub>1</sub>	11.6	11.2	13.5	13.0	14.4	10.4	25.4	20.2	19.8	18.6	15.6	13.2
Mean 9am wind speed (km/h) <sub>2</sub>	43	13	16	19	19	17	15	16	16	11	16	1
Mean 3pm wind speed (km/h) <sub>2</sub>	37	19	20	25	25	26	19	21	22	20	21	19
Mean 9am relative humidity (%) <sub>2</sub>	56	59	54	70	61	61	75	76	76	75	69	70
Mean 3pm relative humidity (%) <sub>2</sub>	60	53	58	67	58	61	73	76	74	72	69	71

The averages from the previous reporting period for the Bellambi weather station are shown in **Table 1-2** and have been included for comparative purposes.

Table 1-2            Averages from Previous Reporting Period – Bellambi Weather Station

	2022							2023				
	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
Rainfall (mm) <sub>1</sub>	7.0	496	25	200	260	56	48.2	162	157	74.2	143	32.6
Mean max temperature (°C) <sub>1</sub>	17.2	16.7	18.4	18.6	20.4	21.6	22.5	24.3	25.4	26.3	22.2	19.3
Mean min temperature (°C) <sub>1</sub>	10.3	10.4	14.1	12.2	14.4	10.4	15.8	18.6	19.4	19.2	15.5	15.5
Mean 9am wind speed (km/h) <sub>2</sub>	18	23	16	17	17	17	19	17	16	14	15	16
Mean 3pm wind speed (km/h) <sub>2</sub>	20	25	22	25	23	26	23	25	25	20	21	19
Mean 9am relative humidity (%) <sub>2</sub>	57	69	61	70	73	61	67	77	72	70	67	56
Mean 3pm relative humidity (%) <sub>2</sub>	50	65	57	67	71	61	64	73	69	66	65	52

This reporting period recorded almost 1300 mm of rainfall with falls less than the previous year. The lowest rainfall month was June 2023 with only 7.6 mm, whilst the highest was April 2024 with 251 mm. It is significant to note that rainfall was received every month of the reporting period.

Temperatures were mild with minimal fluctuations due to more stable weather patterns. The lowest average temperature was 10.4 degrees Celsius and the highest was 25.7 degrees Celsius. Wind speed and humidity were also mild throughout this reporting period.

## 3 Field Investigations

### 3.1 Fieldwork Methodology

The subsections below describe the frequency of monitoring, the monitoring methods, monitoring locations and analytes for surface gas, subsurface gas, stormwater, leachate and groundwater. The fieldwork methodologies implemented during the reporting period were developed in consideration of the guidance provided in the *NSW EPA Environmental Guidelines: Solid waste landfills (second edition)* (EPA 2016).

#### 3.1.1 Surface Gas

Surface gas monitoring was completed during the reporting period to assess for potential surface emissions of landfill gases (LFG) emanating from the landfilled areas at the Site. The purpose of surface gas monitoring is to demonstrate that the cover material effectively controls the emission of landfill gas. The fieldwork methodology for surface gas monitoring is summarised below in **Table 1-3**. The location of each surface gas monitoring location is shown on **Figure 3**.



Figure 3: Surface Gas Monitoring Locations

Table 1-3 Surface Gas Monitoring Methodology

Activity	Description
Frequency and Dates of Monitoring	Surface gas monitoring for methane was completed annually during the reporting period in accordance with Section 5 (M2.2) of EPL 5861.

Activity	Description
Monitoring Method	<p>Methane was measured by a third party contractor, ALS Environmental, using an Inspectra Laser Gas Detector. The instrument used to measure methane concentrations was calibrated prior to each monitoring event.</p> <p>Surface gas monitoring was achieved by testing the atmosphere 5 centimetres above the ground surface in areas with intermediate or final cover where wastes have been placed. The monitoring was completed on calm days (winds below 10km/hr) and in transects with an approximate spacings of 25m.</p>
Monitoring Locations	<p>Surface gas monitoring for methane was undertaken at the following locations:</p> <ul style="list-style-type: none"> <li>Point 3: areas where intermediate or final cover has been placed ie transects A, B, C, E, F, G, H, I, J, K, L, M, N, O and P</li> <li>Weighbridge Office</li> <li>Nixon Place and Halls Road fence lines: transect Q</li> </ul>

### 3.1.2 Subsurface Gas

Subsurface gas monitoring was completed during the reporting period to assess for potential offsite migration. The fieldwork methodology for subsurface gas monitoring is summarised below in **Table 1-4**. The location of each subsurface gas monitoring location is shown on **Figure 2**.

Table 1-4 Subsurface Gas Monitoring Methodology

Activity	Description
Frequency of Monitoring	Subsurface gas monitoring for methane was completed quarterly during the reporting period in accordance with Section 5 (M2.2) of EPL 5861.
Monitoring Method	<p>Subsurface gas monitoring was measured by a third party contractor, ALS Environmental, using an Inspectra Laser Gas Detector. The instrument used to measure methane concentrations was calibrated prior to each monitoring event.</p> <p>Subsurface gas monitoring was achieved by testing the methane concentration in six landfill gas monitoring wells (listed below) that are situated around the northern, eastern and southern perimeters of the landfill. The contents of each well was sampled and analysed prior to potential dilution by air.</p>
Monitoring Locations	Subsurface gas monitoring for methane was undertaken at landfill gas monitoring wells, Point 4, Point 17, Point 18, Point 19, Point 20 and Point 21.

### 3.1.3 Stormwater

Stormwater monitoring was scheduled to be completed during the reporting period to detect excess sediment loads in stormwater leaving the site and/or cross-contamination of stormwater with landfill leachate.

The fieldwork methodology for stormwater monitoring is summarised below in **Table 1-5**. The location of stormwater monitoring locations is shown on **Figure 2**.

Table 1-5 Stormwater Monitoring Methodology

Activity	Description
Frequency of Monitoring	Stormwater sampling was scheduled to be completed daily during any discharge in accordance with Section 5 (M2.3) of EPL 5861, however, stormwater monitoring was not undertaken during the reporting since overflows of the stormwater pond did not occur.
Monitoring Method	N/A
Monitoring Locations	<p>Had an overflow from the stormwater pond occurred a water sample would have been collected from the following monitoring point in accordance with Section 5 (M2.3) of EPL 5861:</p> <ul style="list-style-type: none"> <li>1 (overflow from stormwater pond)</li> </ul>

Activity	Description
Analytes	In accordance with Section 5 (M2.3) of EPL 5861 each stormwater sample would have been scheduled to be analysed for: <ul style="list-style-type: none"> <li>pH</li> <li>Total Suspended Solids (TSS)</li> </ul>

### 3.1.4 Leachate

Leachate monitoring was completed periodically during the reporting period to provide data on the composition, height levels and volumes of leachate produced by the Site, and to record details about any irregular discharges or overflows of leachate from the Site. The fieldwork methodology for leachate monitoring is summarised below in **Table 1-6**. The location of leachate monitoring locations is shown on **Figure 2**.

Table-1-6 Leachate Monitoring Methodology

Activity	Description
Frequency of Monitoring	Leachate sampling was completed quarterly to assess electrical conductivity and annually to assess for the remainder of parameters / contaminants (listed below) in accordance with Section 5 (M2.3) of EPL 5861.
Monitoring Method	Leachate monitoring was completed by a third party contractor, ALS Environmental. Grab samples of water were collected using a scoop at the nominated sampling point (summarised below). The instrument used to measure water quality parameters was calibrated prior to each monitoring event.
Monitoring Locations	A leachate sample was collected from the Monitoring Point 2 (leachate pond) in accordance with Section 5 (M2.3) of EPL 5861.
Analytes	In accordance with Section 5 (M2.3) of EPL 5861 each leachate sample collected during the annual monitoring event was analysed for: <ul style="list-style-type: none"> <li>Metals (aluminium, arsenic, barium, cadmium, chromium (hexavalent and total), cobalt (Point 5, 6 and 7 only), copper, lead, manganese, mercury, zinc)</li> <li>Benzene, toluene, ethylbenzene, xylene (BTEX)</li> <li>Fluoride</li> <li>Nitrate and nitrite</li> <li>OCP</li> <li>OPP</li> <li>PAH</li> <li>Alkalinity</li> <li>Calcium, magnesium, potassium, sodium, chloride, sulfate</li> <li>pH and conductivity</li> <li>Standing water level</li> <li>TDS</li> <li>TPH</li> <li>Total phenolics</li> <li>TOC</li> <li>Nitrogen (ammonia)</li> </ul>

### 3.1.5 Surface Water

Surface water monitoring was completed periodically during the reporting period to verify that offsite surface water bodies were not being impacted by leachate or by sediment-laden stormwater from the landfill. The fieldwork methodology for surface water monitoring is summarised below in **Table 1-7**. The location of each stormwater monitoring location is shown on **Figure 2**.

Table 1-7 Surface Water Monitoring Methodology

Activity	Description
Frequency of Monitoring	Surface water sampling was completed quarterly in accordance with Section 5 (M2.3) of EPL 5861.
Monitoring Method	Surface water monitoring was completed by a third party contractor, ALS Environmental. Grab samples of water were collected using a scoop at the nominated sampling point (summarised below). The instrument used to measure water quality parameters was calibrated prior to each monitoring event.
Monitoring Locations	A surface water sample was collected from Monitoring Point 8 (pony club) in accordance with Section 5 (M2.3) of EPL 5861.
Analytes	<p>In accordance with Section 5 (M2.3) of EPL 5861 each sample was analysed for:</p> <ul style="list-style-type: none"> <li>Conductivity</li> <li>Dissolved oxygen</li> <li>Faecal coliforms</li> <li>Nitrogen (ammonia)</li> <li>pH</li> <li>Potassium</li> <li>Redox potential</li> <li>Total dissolved solids</li> <li>Total organic carbon</li> </ul>

### 3.1.6 Groundwater

Groundwater monitoring was completed periodically during the reporting period to track groundwater quality with time and evaluate interactions with leachate and potential contaminants. The fieldwork methodology for groundwater monitoring is summarised below in **Table 1-8**. The location of each groundwater monitoring location is shown on **Figure 2**.

Table 1.8 Groundwater Monitoring Methodology

Activity	Description		
Frequency Monitoring	Groundwater monitoring was completed on a quarterly basis during the reporting period in accordance with Section 5 (2.3) of EPL 5861.		
Monitoring Method	Groundwater was sampled by a third party contractor, ALS Environmental, using bailer technique. A pre-calibrated water quality meter used to measure groundwater quality parameters during monitor well purging. The collected groundwater samples were submitted to ALS Environmental for analysis of contaminants and parameters of interest (summarised below). Ground water levels were recorded before purging.		
Monitoring Locations	Groundwater bores monitored during the reporting period included Point 5, Point 6, Point 7, Point 12, Point 13, Point 14, Point 15 and Point 16.		
Analytes	<p>In accordance with Section 5 (M2.3) of EPL 5861 groundwater monitoring points were analysed for:</p> <table> <tr> <td> <u>Annually</u> <ul style="list-style-type: none"> <li>Metals (aluminium, arsenic, barium, cadmium, chromium (hexavalent and total), cobalt (Point 5, 6 and 7 only), copper, lead, manganese, mercury, zinc)</li> <li>Benzene, toluene, ethylbenzene, xylene (BTEX)</li> <li>Fluoride</li> <li>Nitrate and nitrite</li> <li>OCP</li> <li>OPP</li> <li>PAH</li> <li>TPH</li> <li>Total phenolics</li> </ul> </td><td> <u>Quarterly</u> <ul style="list-style-type: none"> <li>Alkalinity</li> <li>Calcium, magnesium, potassium, sodium, chloride, sulfate</li> <li>pH and conductivity</li> <li>Standing water level</li> <li>TDS</li> <li>TOC</li> <li>Nitrogen (ammonia)</li> </ul> </td></tr> </table>	<u>Annually</u> <ul style="list-style-type: none"> <li>Metals (aluminium, arsenic, barium, cadmium, chromium (hexavalent and total), cobalt (Point 5, 6 and 7 only), copper, lead, manganese, mercury, zinc)</li> <li>Benzene, toluene, ethylbenzene, xylene (BTEX)</li> <li>Fluoride</li> <li>Nitrate and nitrite</li> <li>OCP</li> <li>OPP</li> <li>PAH</li> <li>TPH</li> <li>Total phenolics</li> </ul>	<u>Quarterly</u> <ul style="list-style-type: none"> <li>Alkalinity</li> <li>Calcium, magnesium, potassium, sodium, chloride, sulfate</li> <li>pH and conductivity</li> <li>Standing water level</li> <li>TDS</li> <li>TOC</li> <li>Nitrogen (ammonia)</li> </ul>
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### 3.1.6 Trade Wastewater

Monitoring of trade wastewater was completed periodically during the reporting period to confirm that water quality parameters of wastewater discharge were within the acceptable criteria. Discharge of trade waste to sewer was undertaken by Council in accordance with the *Consent to Discharge Industrial Trade Wastewater* (Sydney Water 2023) (the *Consent*). The fieldwork methodology for trade wastewater monitoring is summarised below in **Table 1-9**. The trade waste monitoring location is shown on **Figure 2**.

Table 1-9 Trade Wastewater Monitoring Methodology

Activity	Description
Frequency	<p>Trade wastewater sampling was undertaken in July 2019 and approximately every 2 months thereafter. If trade wastewater was not discharged on the scheduled day, then the sample was taken on the next day that trade wastewater was discharged.</p> <p>The reading of the flowmeter was obtained at the commencement and conclusion of each sampling event. Discrete samples were collected and tested for pH at the start and finish of each sample day.</p>
Monitoring Method	<p>Trade wastewater was sampled by a third party contractor, ALS Environmental. Composite samples were collected over a 24 hour period using a Composite Auto-sampler, and pre and post monitoring samples were collected in the form of grab samples.</p> <p>The probe used to measure water quality parameters was calibrated prior to each monitoring event and the trade wastewater samples collected were submitted to ALS Environmental for analysis of parameters of interest (summarised below).</p>
Monitoring Locations	<p>In accordance with the <i>Consent</i> (Sydney Water, 2019) monitoring of trade wastewater was undertaken at a sampling point located at the pre-treatment discharge, excluding domestic sewage and prior to the point of connection to the Sewer. The specific monitoring location is shown on <b>Figure 2</b>.</p>
Analytes	<p>Composite samples were submitted to ALS Environmental for analysis of the following:</p> <ul style="list-style-type: none"> <li>▪ Nitrogen (ammonia)</li> <li>▪ Suspended solids;</li> <li>▪ Total dissolved solids; and</li> <li>▪ Iron.</li> </ul> <p>Discrete samples were tested on site for pH and temperature using a calibrated water quality meter. Additionally, the volume of wastewater discharged was obtained from the total flow reading presented on the flowmeter system.</p>
Aesthetic Assessment	<p>During sampling the sampler recorded the following aesthetic properties in accordance with the <i>Consent</i> (Sydney Water, 2023):</p> <ul style="list-style-type: none"> <li>▪ Temperature;</li> <li>▪ Colour;</li> <li>▪ pH;</li> <li>▪ Fibrous materials;</li> <li>▪ Gross solids; and</li> <li>▪ Flammability.</li> </ul>



## 4 Data Quality Management

The NSW EPA (2017) *Guidelines for the NSW Site Auditor Scheme (3<sup>rd</sup> Edition)*, which is endorsed by the NSW EPA under s105 of the *Contaminated Land Management Act 1997*, requires that Data Quality Objectives (DQOs) are to be adopted for all assessment and remediation programs. The DQO process as adopted by the NSW EPA is described within USEPA (2000) *Guidance for the Data Quality Objective Process and Data Quality Objectives Process for Hazardous Waste Site Investigations*.

### 4.1 Data Quality Objectives

The DQO process has been used to establish a systematic planning approach to setting the type, quantity and quality of the data required for making decisions based on the environmental condition of the Site. The DQO process involves the following six steps detailed in **Table 1-10**.

Table 1-10 The DQO Process

Activity	Description
Step 1: State the Problem	<p>An Annual Report is required as a condition of EPL 5861 to assess the environmental performance of the site during the 2023/24 reporting period.</p> <p>The Annual Report will summarise the type, concentrations, and extent of potential contamination / parameters in the matrices sampled including landfill gas (surface and subsurface), leachate, surface water and groundwater.</p>
Step 2: Identify the decision / goal of the study	<p>The NSW EPA requires an Annual Report to confirm if the environmental performance of the site meets the licence conditions and regulatory obligations of EPL 5861.</p>
Step 3: Identify the information inputs	<p>The primary inputs to the decisions described above are:</p> <ul style="list-style-type: none"> <li>○ Assessment of landfill gas, leachate, surface water and groundwater in accordance with direction of Section 5 (Monitoring and Recording Conditions) of EPL 5861.</li> <li>○ Assessment of management procedures for waste tyres.</li> <li>○ Laboratory analysis of samples for the contaminants and parameters of interest defined in Section 5 of EPL 5861.</li> <li>○ Assessment of analytical results against applicable performance criteria and Section 3 (Limit Conditions) of EPL 5861.</li> <li>○ Review of complaints recorded during the reporting period that relate to odour originating from the site.</li> <li>○ Aesthetic observations material encountered during sampling.</li> <li>○ Assessment of the suitability of the analytical data obtained, against the Data Quality Indicators (DQIs) outlined below.</li> <li>○ The temporal boundaries of the study are from the 29<sup>th</sup> of May 2023 to the 29<sup>th</sup> of May 2024 (i.e. the reporting period).</li> </ul>
Step 4: Define the boundaries of the study	<p>The decision rules for the Annual Report include:</p> <ul style="list-style-type: none"> <li>○ The sampling points, contaminants and parameters of interest, frequency of sampling and sampling method will meet the requirements EPL 5861.</li> <li>○ Samples requiring laboratory analysis will be analysed at National Association of Testing Authorities (NATA) accredited laboratory.</li> </ul>

	<ul style="list-style-type: none"> <li>○ Laboratory QA/QC results will indicate reliability and representativeness of the data set.</li> </ul>
Step 5: Develop the analytical approach	<p>Laboratory limits of reporting (LORs) will be below the applicable guideline criteria for the analysed contaminants and parameters of interest, where possible.</p> <p>Applicable guideline criteria will be sourced from EPL 5861 and other NSW EPA endorsed guidelines (as necessary).</p> <p>If the concentration of a contaminant or parameter of interest is outside of the acceptable limit additional works may be required to assess the potential risk.</p>
Step 6: Specify performance or acceptance criteria	<p>To ensure the results obtained are accurate and reliable, sampling and analysis was undertaken in accordance with the guidance provided in EPL 5861. DQIs are used to assess the reliability of field procedures and analytical results. In particular, the DQIs within NSW EPA (2017) are used to document and quantify compliance.</p> <p>DQIs are described below, and are presented in Table 4-2, below:</p> <p>Completeness – A measure of the amount of useable data (expressed as %) from a data collection activity.</p> <p>Comparability – The confidence (expressed qualitatively) that data are representative of each media present on the site.</p> <p>Precision – A quantitative measure of the variability (or reproducibility) of data.</p> <p>Accuracy (bias) – A quantitative measure of the closeness of reported data to the true value.</p> <p>Sampling and Analysis has been undertaken in compliance with EPL 5861 by qualified technical staff with analysis completed by a NATA accredited laboratory.</p>

## 4.2 Data Quality Indicators

The following DQIs referenced in Step 6 in Table 1-7, have been adopted in accordance with the NSW EPA (2017) *Guidelines for the Site Auditor Scheme (3<sup>rd</sup> Edition)*. The DQIs outlined in **Table 1-11** assist with decisions regarding the contamination status of the site, including the quality of the laboratory data obtained. All samples met these requirements.

Data Quality Indicator	Frequency	Data Acceptance Criteria
<i>Completeness</i>		
Field documentation correct	Each sampling event	All samples
Suitably qualified and experienced sampler	Each sampling event	All samples
Appropriate laboratory methods and limits of reporting (LORs)	Each sampling event	All samples
Chain of custody (COCs) completed appropriately	All samples	All samples
Compliance with sample holding times	All samples	All samples
<i>Comparability</i>		
Consistent standard operating procedure for collection of each sample		
Experienced sampler	All samples	All samples
Climatic conditions recorded and influence on samples quantified	Representativeness	
Consistent analytical methods, laboratories and units	Sampling technique appropriate for each media and analytes (appropriate collection, handling and storage)	
Samples homogenous	All samples	All samples
Detection of laboratory artefacts	-	Detected and assessed
Samples extracted and analysed within holding times	All samples	All samples

## 5 Performance Criteria

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Environmental monitoring data gathered during the reporting period was screened against the applicable criteria for each sample type / matrix as summarised below.

### 5.1 Surface Gas

The results of surface gas monitoring were screened against the criteria provided in the *Environmental Guidelines* (EPA 2016). Specifically, the threshold level for closer investigation and potential action was detection of 500 parts per million of methane at any point of the landfill service.

### 5.2 Subsurface Gas

The results of subsurface gas monitoring were screened against the criteria provided in the *Environmental Guidelines* (EPA 2016). Specifically, the threshold levels for further investigation and corrective action were detection of methane at concentrations above 1% (v/v) and carbon dioxide at concentrations of 1.5% (v/v) above established natural background levels.

### 5.3 Stormwater

In accordance with Section 3 (L2.5) of EPL 5861, the performance criteria for stormwater was no discharge of contaminated stormwater (stormwater that exceeds the limits of pH and total suspended solids) under dry weather conditions or storm events that are less than a 5 day, 75th percentile. The license defines a 5 day, 75th percentile rainfall event as a rainfall depth of 35.6mm over any consecutive 5 day period.

### 5.4 Leachate

In accordance with Section 3 (L2.7) of EPL 5861 the limit for leachate was no discharge of leachate to waters under dry weather conditions or storm event(s) of less than 1:25 year, 24 hour recurrence interval. The license defines a 1:25 year, 24 hour duration rainfall event as a rainfall depth of 306 millimetres over any consecutive 24 hour period.

The performance criteria adopted for leachate discharges was based on records held by Council regarding the timing and nature of leachate discharges during the reporting period. Comparison was made to adopted surface and groundwater criteria below to provide an initial screening level.

## 5.5 Surface Water and Groundwater

The selected performance criteria for surface water and groundwater samples were based on the recommendations of the *Environmental Guidelines* (EPA 2016) and in consideration of the land use, site setting and the plausible interactions between potential contaminants and human and environmental receptors.

The Australian Water Quality Guidelines (2020) are used in water quality assessment this reporting period. These water quality guidelines provide detailed approaches and advice on identifying appropriate **guideline values** for selected indicators. These guideline values help to ensure that agreed community values and their management goals are protected. For the protection of aquatic ecosystems, locally derived guideline values are most appropriate.

Assessment of water physical characteristics was based on the Australian Water Quality Guidelines (South East Australia Lowland Physical Characteristics). This provides indicative threshold values for the suitability of site surface waters for discharge into nearby surface water systems.

## 5.6 Trade Wastewater

Trade wastewater analytical results were screened against the criteria provided in the *Consent* (Sydney Water, 2023). The *Consent* provides criteria for a variety of parameters for the long term average daily mass (LTADM) and the maximum daily mass (MDM).

In addition to analytical performance criteria the *Consent* provides limits for aesthetic properties of trade wastewater including temperature, colour, pH, fibrous materials, gross solids and flammability.

The *Consent* was renewed in October 2023.

## 5.7 Odour

In accordance with Section 8 (E1.3) of EPL 5861 offensive odour must not emit beyond the boundary of the premises. The performance criteria adopted for potential offensive odour emissions was occurrences (if any) of complaints from members of the public relating to odour and monthly staff monitoring.

# 6 Results

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Monitoring results gathered during the reporting period are provided in the data tables in **Appendix A** and are summarised in the relevant subsections below. Laboratory certificates of analysis and

quality reports have not been appended to this report due to the large number of files, however, they can be provided upon request.

## 6.1 Gas

### 6.1.1 Surface Gas

The highest reported concentration of methane was 8.4 ppm measured at Point 6 of transect J during the August 2023 monitoring event. An anomalous value of 26.9 ppm was also noted. However, this is well below the threshold level for further investigation and corrective action of 500 ppm.

Six sampling points were not able to be accessed safely during this reporting period, resulting in 24 non-compliances where data was not collected. This was the result of flooding, slope instability and overgrown vegetation.

Methane levels have consistently remained extremely low at this site and surface gas monitoring results from the reporting period are summarised in **Table 6 of Appendix A**.

### 6.1.2 Subsurface Gas

Only one methane reading was recorded within subsurface gas monitoring wells above 0.1 % v/v threshold value. This was at Point 22 with a value of 0.9 % v/v. However, all subsurface gas monitoring results were below the threshold for further investigation and corrective action of 1% v/v.

Subsurface gas samples were also measured for carbon dioxide concentrations as part of the monitoring regime though this is not a requirement of EPL 5861. Five locations returned results above the threshold for further investigation of 1.5% (v/v) with the exception being Point 25 which remained under this value throughout this reporting period. The highest continuous and peak results were from Point 4 (LFG MB1) with 9.0% (v/v) and 9.0% (v/v) peak on the 16/08/2023 when the sampling occurred. Further investigation is being undertaken as part of the capping design of the Site.

A summary of subsurface gas readings is provided in **Table 5 of Appendix A**.

## 6.2 Stormwater

No stormwater was released during this reporting period. Sampling was undertaken from the stormwater retention basin adjacent to the Pony Club on site at each of the quarterly monitoring events. Results showed an exceedance for nitrogen (ammonia) in 75% of samples compared to the AWQG (2020) for fresh water and the SE Australia Lowland River Physical Characteristics (ANZECC 2000).

The samples collected in May 2023, August 2023 and November 2023 after heavy rain events indicated elevated levels over the Freshwater guideline recommendation at 7.65 mg/L, 25.8 mg/L and 13.8 mg/L respectively, however there was no uncontrolled offsite discharge.

Monitoring results from the reporting period are summarised in **Table 4 of Appendix A** with the following notable results presented in **Table 1.12**.

Table 1-12 Surface water guideline exceedances

			Nitrogen (Ammonia) mg/L
AWQG 2000 SE Australia Lowland River Physical Characteristics			0.02
AWQG 2000 Fresh Water (95%)			0.90
EPA Designation	Locations ID	Sample Date	
8	Stormwater adj. to Pony Club	02/05/2023	7.65
		01/08/2023	25.8
		01/11/2023	13.8
		08/02/2024	0.02

### 6.3 Leachate

No uncontrolled off-site discharges of leachate occurred during the reporting period under dry or wet weather conditions. Samples were collected from the leachate pond quarterly for electrical conductivity analysis and annually for a broader suite of analytes. All results were below the laboratory LOR or adopted guidelines for site waters.

Leachate monitoring results from the reporting period are summarised in **Table 3 of Appendix A**.

### 6.4 Groundwater

#### 6.4.1 Groundwater Levels

Groundwater levels measured at the site during the reporting period are summarised in **Table 5A of Appendix B** and ranged from 1.07 m below ground level (bgl) at groundwater monitoring point 15 to 5.89 m bgl at groundwater monitoring point 16. All bores were able to be measured this reporting period indicating that groundwater continues to flow consistently through the site.

#### 6.4.2 Laboratory Results

Groundwater data tables are provided in **Table 1 of Appendix B** with the pertinent findings summarised below:

Benzene, toluene, ethylbenzene and xylenes (BTEX) and TPH were not detected above the laboratory limit of response in any groundwater sample collected during the reporting period (refer to **Table 5B of Appendix B**). PAHs were not detected above the laboratory limit of response in any sample.

A summary of heavy metals results is provided below and tabulated in **Table 1 of Appendix B**:



Aluminium (total) concentrations ranged from 1.01 mg/L at groundwater monitoring point 5 to 136 mg/L groundwater monitoring point 13. All samples were above the ANZAST 95% protection trigger level of 0.055 mg/L.

Arsenic concentrations were reported below the adopted performance criteria, with the exception of Point 6 on 16/05/04 with a reading of 0.016 mg/L.

Barium and mercury were reported at concentrations below the adopted performance criteria for all samples. Cadmium (total) concentrations at all monitoring points were below the freshwater guideline value of 0.0002 mg/L, with the exception being Point 6 that had a reading of 0.0007 mg/L and Point 0.0008 mg/L on the 1/08/2023.

Chromium (hexavalent) was not detected above the laboratory limit of response in all groundwater samples collected during the reporting period.

Copper (total) concentrations ranged from 0.002 - 0.034 mg/L throughout the groundwater network. Three values were above the freshwater guideline value of 0.014 mg/L at Point 12 (0.017 mg/L), Point 13 (0.034 mg/L) and Point 16 (0.034 mg/L) respectively. All values are below the health guideline value of 2 mg/L.

Lead (total) concentrations were all recorded above the threshold criteria for freshwater (0.0034 mg/L). The results ranged from 0.004 to 0.088 mg/L, an increase from the last reporting period.

Manganese (total) concentrations ranged from 0.011 mg/L (Point 14) to 0.265 mg/L (Point 5). All samples had concentrations below the adopted performance criteria.

Zinc (total) concentrations ranged from 0.011 mg/L (Point 15) to 0.238 mg/L (Point 5) with all samples slightly above the ANZAST 95% protection trigger level of 0.008 mg/L.

Specific trigger values were not provided in the adopted performance criteria for calcium, chromium (III + VI), cobalt, magnesium and potassium.

A summary of inorganics is provided below and tabulated in **Table 1 of Appendix A:**

Ammonia concentrations ranged from below the laboratory LOR (multiple samples) to 0.59 mg/L in Point 14. All samples were under the threshold level for freshwater at 0.9 mg/L.

Fluoride was below the laboratory LOR in all samples and were therefore below the adopted performance criteria

Nitrate concentrations ranged from below laboratory LOR (multiple samples) to 0.52 mg/L at point 7.

Specific trigger values were not provided in the adopted performance criteria for alkalinity, chloride, nitrite, sodium, TDS, TOC and sulfate.

A summary organochlorine pesticides is provided below and tabulated in **Table 1 of Appendix A:**

OCP contaminants aldrin and dieldrin, chlordane, dichlorodiphenyltrichloroethane (DDT), endrin, lindane and heptachlor were not detected above the laboratory limit of response in any sample, however, it is noted that the adopted criteria were below the laboratory limit of response. Therefore the results cannot be screened against the criteria.

A summary organophosphorus pesticides is provided below and tabulated in **Table 1 of Appendix A.**

OPP contaminants azinophos methyl, chlorpyrifos, diazinon, dimethoate, malathion, methyl parathion and parathion were not detected above the laboratory limit of response in any sample.

Bromophos-ethyl, carbophenothion, chlorfenvinphos, dichlorvos, ethion, fenthion, fethyl parathion, monocrotophos, fenamiphos and pirimphos-ethyl were not detected above the laboratory limit of response and were therefore below the adopted performance criteria.

pH ranged from 4.3 (point 7) to 6.5 (Point 6) (refer to **Table 1 of Appendix A**). This is consistent with previous years.

## 6.5 Trade Wastewater

Trade wastewater data tables are provided in **Table 6 of Appendix A** with the pertinent findings summarised below.

Trade wastewater monitoring was undertaken six times during the reporting period. The results of monitoring showed that on every occasion the volume discharge, pH, ammonia (as N), suspended solids, total dissolved solids, temperature and iron were within acceptable criteria provided in the *Consent* (Sydney Water, 2023).

## 6.6 Waste Tyres

Section 3 (L3.2), (L3.3) and (L3.4) of the EPL provides limitations on the size and number of waste tyres that can be disposed of at the premises. The Site has ceased operation and therefore does not receive waste tyres.

## 6.7 Odour

No complaints were received by Council from members of the public during the reporting period relating to offensive odour detected at an offsite location.

## 7 Quality Assurance/Quality Control (QA/QC)

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A summary of the results of the QA/QC results are included in the following section.

### 7.1 Laboratory QA/QC

The selected analytical laboratory, ALS Environmental, undertake internal QA/QC procedures which include the analysis of method blanks, internal duplicate samples, laboratory control samples, matrix spikes and surrogate recovery. Additionally, laboratory QA/QC measures include receipt, logging, storage, preservation, holding time and analysis of samples within the method specified.

A review of the laboratory QA/QC procedures indicates that laboratory QA/QC procedures were within specified ranges for all samples with the exception of four duplicates, three laboratory control samples and four matrix spikes. In addition, eight matrix spike recoveries were unable to be determined as the background level was greater than or equal to the 4 times the spike level, and one laboratory control spike recovery which was greater than the upper control limit.

### 7.2 Data Useability

The data validation process of field and laboratory QA/QC data indicates that the reported analytical results are representative of the conditions at the sample locations and that the analytical data can be relied upon for the purpose of the Annual Report for EPL 5861.

## 8 Discussion

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The data and information gathered during the reporting period is discussed below in consideration of the performance criteria. In addition, and in accordance with Section 6 (R1.8) of EPL 5861, historical results have been tabulated and presented in graphical format that compares data from at least five years (where available).

Trend graphs are provided in **Appendix C** and summarised below in the sections below, however, discussion has not been provided for OCP, OPP, PAH, BTEXN or Phenolics as these contaminants have historically never been reported above the laboratory limit of response.

### 8.1 Surface Gas

Surface gas monitoring completed during the reporting period did not identify surface methane concentrations that exceeded the threshold level. There was one anomalous reading of 26.9 ppm, however this is still well below the threshold level.

As mentioned previously, data was not able to be collected on 24 occasions due to lack of access during this reporting period. Access has since been reinstated and the area stabilised.

### 8.2 Subsurface Gas

Subsurface gas monitoring completed during the reporting period did not identify subsurface methane at concentrations that exceeded the threshold level. As such non-conformances of the EPL did not occur during the reporting period with respect to subsurface gas.

### 8.3 Stormwater

No discharges of stormwater from the site's stormwater system occurred during the reporting period and therefore additional monitoring was not required. As such non-conformances of the EPL did not occur with respect to stormwater.

### 8.4 Leachate

There were no uncontrolled discharge off-site or exceedances above the adopted performance criteria during the reporting period for heavy metals. Concentrations reported were for total metals in accordance with the EPL requirement, however, it is important to note that the adopted screening criteria recommended by the *Environmental Guidelines* (EPA 2016) are intended for application to concentrations of dissolved metals. As such, when exceedances occur, they are not necessarily indicative of environmental concern with the contaminant concentrations most likely attributed to the presence of sediment in unfiltered samples.

Ammonia was reported above the ANZAST 95% protection trigger level. Given the nature of leachate at landfill sites an elevated concentration of ammonia is not unexpected. The sample was collected from a leachate pond located on Site and is not representative of water exiting the Site.

No uncontrolled releases of contaminated leachate occurred during the reporting period under dry weather or storm events. As such non-conformances of the EPL did not occur with respect to releases of leachate.

## 8.5 Surface Water

The surface water samples collected from Point 8 (pony club) had pH levels within range (6.5-8.5) with the exception of one elevated value of 9.6 on 8/02/2024. This was followed by a recorded value of 7.2 on the next sampling event on 2/05/2024. Fluctuations are most likely caused by sporadic rainfall events over the reporting period.

Ammonia levels were elevated from the previous reporting period, most likely influenced by rainfall events. No leachate overflows from the site were recorded, however there may be some influence from overflow waters from the nearby sullage depot. Levels of Total Dissolved Solids were also elevated (above 50 mg/L) due to continuing heavy rainfall events.

Faecal coliforms levels during this period were lower compared to the previous reporting period. This is consistent with results prior to the heavy rainfall of the previous two reporting periods.

### 8.5.1 Trend Analysis

A series of graphs showing trends in surface water contaminant and parameter levels are provided in **Appendix B** and are discussed below. It appears that the hydrological system continues to strongly flow throughout the site after two years of heavy rainfall.

Dissolved oxygen, redox potential, potassium, and TOC all remained within normal limits and fluctuated due to seasonal variations as well as the sporadic rainfall events.

No overflow events were recorded during this reporting period.

## 8.6 Groundwater

### 8.6.1 Groundwater Levels

Interpretation of groundwater levels across the Site from the reporting period indicate that the inferred groundwater flow direction is from the west to the north east, which is consistent with the local topography and is shown on **Figure 2**. Groundwater is situated at the greatest depths in the higher elevations of the Site toward the western boundary and is shallowest toward the eastern boundary in close proximity to the nearest surface water body, the Hacking River. Since the drought ended in 2020, the monitoring points at higher elevations along the western and southern boundaries began to flow after the prolonged period of drought was broken. This has resulted in an overall decrease in analyte concentrations in the water column across the Site.

#### 8.6.1.1 Trend Analysis

A series of graphs showing groundwater analyte trends are provided in **Appendix B** and discussed below.

#### 8.6.2 Laboratory Results

Groundwater analysis completed during the reporting period showed that the majority of contaminants and parameters of interest specified in EPL 5861 were below the laboratory limit of response or the performance criteria, including BTEX, TPH, PAH, fluoride and nitrate. Performance criteria are not provided for alkalinity, chloride, sodium, TDS, TOC and sulfate, however the results were generally comparable with historical data and are not considered unusual or concerning in the context of the Site use as an operational landfill.

Heavy metal concentrations were reported above the adopted performance criteria during the reporting period for heavy metals including aluminium, cadmium chromium (total), copper, lead and zinc. Concentrations reported were for total metals in accordance with the EPL requirement, however, it is important to note that the adopted screening criteria recommended by the *Environmental Guidelines* (EPA 2016) are intended for application to concentrations of dissolved metals.

##### 8.6.2.1 Trend Analysis

A discussion has not been provided for OCP, OPP, PAH, BTEXN or Phenolics as these contaminants have never been reported above the laboratory limit of response.

A series of graphs showing trends in groundwater contaminant and parameter levels are provided in **Appendix C** and are discussed below.

The trend graphs show that contaminant and parameter concentrations have remained steady and relatively consistent with the four years prior, with a general decline in contaminant concentrations (with the exception of total metals).

The heavy rainfall events of the previous reporting period, coupled with continuing rainfall in this period have impacted on water levels throughout the Site, with the stormwater and leachate ponds maintaining high levels. Groundwater levels have also risen significantly and remain steady.

#### 8.7 Trade Wastewater

Trade wastewater was discharged into the sewer network in accordance with the Consent (Sydney Water 2023) with no non-conformances during the reporting period.

#### 8.8 Waste Tyres

The Site has ceased operation and therefore does not receive waste tyres. As such, non-conformances of the EPL did not occur during the period with respect to waste tyres.

## 8.9 Odour

No complaints were received by Council from members of the public during the reporting period relating to offensive odour detected at an offsite location. As such non-conformances of the EPL did not occur during the reporting period with respect to odour.

## 8.10 Conceptual Site Model

Generally, a conceptual site model (CSM) provides an assessment of the fate and transport of contaminants of potential concern (CoPC) relative to site specific subsurface conditions with regard to their potential risk to human health and the environment. The CSM takes into account site-specific factors including:

- Source(s) of contamination;
- Identification of CoPC associated with past (and present) source(s);
- Vertical, lateral and temporal distribution of CoPC;
- Site specific lithologic information including soil type(s), depth to groundwater, effective porosity, and groundwater flow velocity; and
- Actual or potential receptors considering both current and future land use both for the site and adjacent properties, and any sensitive ecological receptors.

Based on the results discussed in this report a CSM has been developed and is outlined below in **Table 1-13**. Additional details are included in the sections that follow as necessary.

Table 1-13 Conceptual Site Model

CSM Element	Description
Contaminant Sources	<p>Known contaminant sources at the Site include:</p> <ul style="list-style-type: none"> <li>▪ Historical use for disposal of sanitary waste including 'nightsoil' as well as putrescible waste from the 1960s to 1991. From 1991 putrescible waste ceased to be accepted at the Site and the permitted waste was limited to "Class 2" style wastes such as furniture, wood paper, plastics (GHD, 2008).</li> <li>▪ Leachate resulting from degradation of buried waste and interaction with groundwater.</li> </ul>
Site Current and Future Use	The Site is a closed landfill that historically received waste from Wollongong City Council local government area. In accordance with site closure and the rehabilitation plan, the Site will be returned to the community in the future.
Site Geology	The Site lies within the Sydney Basin above the Illawarra escarpment, and is part of the Cumberland Sub-Group of the Illawarra Coal Measures, which are Permian in age. Review of the 1:100,000 geological map 'Wollongong-Port Hacking' (Department of Mineral Resources, 1985) situates the Site on Hawkesbury Sandstone – Medium to



CSM Element	Description
	<p>coarse grained quartz sandstone with very minor shale and laminate lenses, which is consistent with soil samples.</p> <p>Test pitting completed by GHD (2008) as part of the LEMP suggests that the near surface natural geology of the area is as follows.</p> <ul style="list-style-type: none"> <li>▪ Orange Brown Clay Sand overlying;</li> <li>▪ Orange Mottled Clay Sand overlying;</li> <li>▪ White Clay Sand with Red Mottled Laterite (Ironstone) Clay Sand overlying;</li> <li>▪ White Loosely Cemented Sandstone (assumed to be regional bedrock).</li> </ul>
CoPCs	<p>The CoPCs listed in EPL 5861 include heavy metals (aluminium, arsenic, barium, cadmium, chromium (hexavalent and total), cobalt, copper, lead, manganese, mercury, zinc), polycyclic aromatic hydrocarbon, total petroleum hydrocarbons, benzene, toluene, ethylbenzene, xylenes, naphthalene, organochlorine pesticides, organophosphate pesticides and phenolics.</p> <p>In addition to CoPC the EPL identifies potentially hazardous landfill gasses including methane and carbon dioxide.</p>
Extent of Impacts	<p>The extent of potential contamination would primarily be located immediately below and down gradient of the tip face. It may also originate from upstream land uses such as mining and urban development. Monitoring undertaken during the reporting period indicates that contaminants above the adopted criteria are limited to heavy metals and ammonia in leachate and groundwater.</p> <p>Other CoPC were not reported above the laboratory limit of response or the adopted criteria.</p> <p>Methane was detected during the reporting period atop the current and previous tip face (surface gas) and subsurface, however, the concentrations were below the threshold level for further investigation and corrective action.</p>
Potential Human Receptors	<p>Potential human receptors include:</p> <ul style="list-style-type: none"> <li>• Pony club users</li> <li>▪ Trespassers who illegally access the site;</li> <li>▪ Contractors undertaking site maintenance including mowing, landscaping and fence repairs;</li> <li>▪ Contractors undertaking scheduled environmental monitoring (surface water, groundwater and landfill gas); and</li> <li>▪ Individuals working or living within close proximity to the Site.</li> </ul>
Potential Ecological Receptors	<p>Potential ecological receptors include:</p> <ul style="list-style-type: none"> <li>▪ Tributaries to the Hacking River and Wilsons Creek, located to the south east and north, respectively;</li> <li>▪ The Garrawarra State Conservation Area located immediately north and east of the Site boundary;</li> <li>▪ Groundwater under the Site being impacted as a result of the vertical migration of contaminants from leachate and buried waste; and</li> <li>▪ Flora and fauna on the Site interacting with contaminants in the soils including birds scavenging and nesting at the Site.</li> </ul>
Potential Contaminant Pathways	<p>Potential contaminant pathways include:</p> <ul style="list-style-type: none"> <li>▪ Dermal contact with contaminated materials including soil, waste and hazardous building materials during maintenance and potential earthworks;</li> <li>▪ Dermal contact with contaminated media including surface water, groundwater and leachate during environmental monitoring;</li> <li>▪ Inhalation of hazardous landfill gases emanating from buried waste and leachate;</li> <li>▪ Inhalation of volatile contaminants and/or asbestos fibres;</li> <li>▪ Ingestion of contaminant impacted materials including soil, waste and hazardous building materials;</li> <li>▪ Potential contaminant uptake by vegetation; and</li> </ul>

CSM Element	Description
	<ul style="list-style-type: none"> <li>▪ Potential ingestion of contaminant impacted fresh produce (fruit and vegetables) grown down gradient of the site.</li> </ul>

## 8.10 Data Gaps and Uncertainties

The assessment of potential contamination at the site is based on monthly site inspection and review of available historical reports and information. As such, the lateral and vertical extent of potential contamination in soil profile is unknown.

Also, the extent that the surrounding catchment influence water quality flowing through the site also requires consideration and further investigation. A desktop review of catchment water quality and potential contamination pathways is currently being undertaken and is expected to be completed in the next reporting period.

## 8.11 Future Directions

The EPA has requested an update on the Helensburgh Waste Disposal Depot capping works. The existing design has been reviewed internally by Council and several potential improvements have been identified that require further investigation. In summary, progress is as follows:

- Preparation for the stakeholder consultation including:
  - Internal (Wollongong City Council)
  - Regulatory Authorities (e.g. EPA, DPE)
  - Crown Land (owner)
  - Helensburgh/Affected Residents
- The update cost estimate.
- Additional field investigations as required to update the design documentation for the Development Application (DA) Modification Lodgement.
- Preparation of tender and construction documents following DA Modification approval.

## 9 Conclusions

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The following can be concluded based on the monitoring undertaken during the reporting period:

Council implemented an environmental monitoring program during the 2023/2024 reporting period that satisfied the conditions and requirements of EPL 5861 and the *Consent to Discharge Industrial Trade Wastewater* (Sydney Water, 2023). This *Consent* was renewed this reporting period.

Water contained in stormwater and leachate ponds was managed such that uncontrolled releases of contaminated water did not occur during the reporting period.

Monitoring results show that surface and subsurface hazardous ground gases were not present at concentrations that exceed the adopted performance criteria. However, surface gas samples were not able to be collected on 24 occasions.

Some elevated heavy metals and ammonia were present in leachate samples collected from the leachate pond, however, this is not considered unusual in the context of the historical site use as a landfill. Leachate was contained onsite within the pond and as such the concentrations are not considered a significant risk to human or environmental receptors.

Heavy metals were detected above the performance criteria in groundwater, however, samples were submitted for analysis of total metals. Therefore, the elevated concentrations may be due to the presence of sediments. Future monitoring events should also assess dissolved concentrations of heavy metals to determine if elevated metals are attributed to sediment or if they exist in dissolved phase, as discussed below

Complaints from the public relating to offensive odours originating from the Site were not received during the reporting period.

## 10 Recommendations

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Based on the monitoring undertaken during the reporting period the following actions are recommended:

Improve site maintenance to allow for sampling access throughout the year.

Continue the desktop study to assess the effect of the surrounding catchment and behaviour of groundwater through the site to determine any influence (if any) on water quality in the Hacking River catchment.

Recommence stakeholder consultation to determine management requirements for the site rehabilitation.

## 11 Limitations

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This assessment has been undertaken in accordance with Environmental Protection Licence 5861.

The assessment may not identify contamination occurring in all areas of the site or occurring after sampling was conducted. Subsurface conditions may vary considerably away from the sample locations where information has been obtained.

This assessment report is not any of the following:

A preliminary site investigation (PSI), detailed site investigation (DSI) or environmental site assessment (ESA).

A Site Audit Report or Site Audit Statement (SAR/SAS) as defined under the *Contaminated Land Management Act, 1997* or an assessment sufficient for an Environmental Auditor to be able to conclude a SAR/SAS.

A geotechnical report.

A detailed hydrogeological assessment in conformance with NSW DEC (2007) Contaminated Sites: Guidelines for the Assessment and Management of Groundwater Contamination.

A total assessment of the site to determine suitability of the entire parcel of land at the site for one or more beneficial uses of land.

## 12 References

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- ANZECC (2000), Australian Water Quality Guidelines, 2000
- ANZAST (2018), Australian Water Quality Guidelines, 2018
- Australian Standards (1999), AS 4482.2-1999 Guide to the Sampling and Investigation of Potentially Contaminated Soil - Volatile Substances, 1999
- GHD (2008), Landfill Environmental Management Plan, Helensburgh Landfill, 2008
- NEPC (2013), National Environment Protection (Assessment of Site Contamination) Measure, 2013 NHMRC (2014), Australian Drinking Water Guidelines, 2014)
- NSW EPA (1996), NSW Environmental Guidelines: Solid Waste Landfills, 1996 NSW EPA (2013), Requirements for publishing pollution monitoring data, 2013 NSW EPA (2015), Asbestos and Waste Tyre Guidelines, 2015
- NSW EPA (2016), Environmental Guidelines: Solid Waste Landfills (Second Edition), 2016
- NSW EPA (2017), Guidelines for the NSW Site Auditor Scheme (3rd Edition), 2017
- NSW DPI (1985), 1:100,000 geological map Wollongong-Port Hacking, 1985 Sydney Water (2019), Consent to Discharge Industrial Trade Wastewater, 2019
- Sydney Water (2023). Trade Waste Agreement: Helensburgh Waste Disposal Depot.
- US EPA (2000), Guidance for the Data Quality Objectives Process and Data Quality Objectives Process for Hazardous Waste Site Investigations, 2000

# APPENDICIES

## Appendix A

Table 1: Groundwater Quality Data for 2023/24 Reporting Period

		Alkalinity (as calcium carbonate)	Aluminium	Ammonia	Arsenic	Barium	Benzene	Cadmium	Calcium	Chloride	Chromium (hexavalent)	Chromium (Total)	Cobalt	Copper	Depth	Ethylbenzene	Fluoride	Lead
Units		mg/L	mg/L	mg/L	mg/L	mg/L	µg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	Meters	µg/L	mg/L	mg/L
Site Name	Sample Date																	
Monitoring Point 5	01/08/2023	13	1.01	0.05	0.001	0.026	<1	0.0001	16	72	<0.01	0.001	0.003	0.002	3.70	<2	<0.1	0.004
	01/11/2023	27		0.08					19	76					3.81			
	08/02/2024	30		0.08					18	114					3.90			
	16/05/2024	14		0.07					11	83					2.39			
Monitoring Point 6	01/08/2023	118	27.4	0.05	0.016	0.438	<1	0.0007	38	21	<0.01	0.144	0.034	0.060	3.79	<2	<0.1	0.049
	01/11/2023	105		0.03					34	21					3.98			
	08/02/2024	230		0.08					50	20					3.34			
	16/05/2024	134		0.13					36	24					2.80			
Monitoring Point 7	01/08/2023	4	3.09	0.02	<0.001	0.025	<1	<0.0001	<1	139	<0.01	0.002	0.002	0.001	4.49	<2	<0.1	0.004
	01/11/2023	<1		<0.01					<1	119					5.52			
	08/02/2024	2		0.10					1	144					3.31			
	16/05/2024	3		0.15					<1	143					1.37			
Monitoring Point 12	01/08/2023	35	13.9	<0.01	0.006	0.041	<1	<0.0001	13	24	<0.01	0.007	0.002	0.017	3.14	<2	<0.1	0.012
	01/11/2023	38		<0.01					17	24					3.15			
	08/02/2024	76		<0.01					26	23					2.11			
	16/05/2024	48		<0.01					19	21					1.40			
Monitoring Point 13	01/08/2023	6	136	0.02	0.009	0.104	<1	0.0001	23	65	<0.01	0.233	0.002	0.034	3.45	<2	<0.1	0.058
	01/11/2023	9		<0.01					22	72					3.75			
	08/02/2024	38		0.01					18	58					2.80			
	16/05/2024	33		0.02					22	59					1.69			
Monitoring Point 14	01/08/2023	5	13.9	0.07	0.002	0.032	<1	0.0001	11	53	<0.01	0.019	0.005	0.010	3.49	<2	<0.1	0.016
	01/11/2023	6		0.59					22	88					3.79			
	08/02/2024	14		0.12					16	73					2.56			
	16/05/2024	12		0.02					7	17					1.33			
Monitoring Point 15	01/08/2023	9	22.1	<0.01	<0.001	0.014	<1	<0.0001	10	15	<0.01	0.023	<0.001	0.002	3.16	<2	<0.1	0.009
	01/11/2023	10		<0.01					13	14					3.70			
	08/02/2024	8		<0.01					10	13					3.11			
	16/05/2024	5		<0.01					12	16					1.07			
Monitoring Point 16	01/08/2023	6	12.1	0.04	0.002	0.089	<1	0.0008	5	52	<0.01	0.057	0.022	0.034	5.89	<2	<0.1	0.038
	01/11/2023	<1		0.02					4	55					5.85			
	08/02/2024	4		0.01					5	44					4.57			
	16/05/2024	3		0.01					5	40					3.82			



Table 1: Groundwater Quality Data for 2023/24 Reporting Period (continued)

		Magnesium	Manganese	Mercury	Nitrate as N	Nitrite as N	Organochlorine Pesticides	Organophosphate Pesticides	pH	Polycyclic aromatic hydrocarbons	Potassium	Sodium	Sulfate	Toluene	Total Dissolved Solids	Total organic carbon	Total Petroleum Hydrocarbons	Total Phenolics	Xylene	Zinc
Units		mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	pH	µg/L	mg/L	mg/L	mg/L	µg/L	mg/L	mg/L	mg/L	mg/L	µg/L	mg/L
Site Name	Sample Date																			
Monitoring Point 5	01/08/2023	14	0.090	<0.0001	0.07	<0.01	<0.5	<0.5	5.5	<0.5	<1	40	76	<2	215	4	<20	<0.05	<2	0.238
	01/11/2023	17							5.6		<1	42	90		276	5				
	08/02/2024	14							5.7		<1	32	59		260	3				
	16/05/2024	11							5.4		<1	45	40		266	2				
Monitoring Point 6	01/08/2023	19	0.190	<0.0001	0.01	<0.01	<0.5	<0.5	6.5	<0.5	6	19	33	<2	275	7	<100	<0.05	<2	0.050
	01/11/2023	18							6.2		8	22	31		311	<1				
	08/02/2024	25							6.4		5	20	11		372	11				
	16/05/2024	18							6.3		2	21	25		284	3				
Monitoring Point 7	01/08/2023	6	0.072	<0.0001	0.52	<0.01	<0.5	<0.5	4.5	<0.5	2	105	90	<2	305	2	<100	<0.05	<2	0.039
	01/11/2023	6							4.3		2	96	88		344	2				
	08/02/2024	6							4.3		1	99	54		358	1				
	16/05/2024	6							4.3		2	98	74		368	3				
Monitoring Point 12	01/08/2023	8	0.025	<0.0001	0.14	<0.01	<0.5	<0.5	5.5	<0.5	2	20	37	<2	126	7	<20	<0.05	<2	0.011
	01/11/2023	8							5.6		3	21	38		150	6				
	08/02/2024	10							5.9		2	18	36		161	8				
	16/05/2024	8							5.7		1	19	34		153	8				
Monitoring Point 13	01/08/2023	13	0.027	<0.0001	0.01	<0.01	<0.5	<0.5	4.9	<0.5	5	28	56	<2	308	5	<100	<0.05	<2	0.112
	01/11/2023	12							5.1		8	28	52		460	5				
	08/02/2024	8							5.6		4	14	24		148	3				
	16/05/2024	8							5.9		3	26	24		332	5				
Monitoring Point 14	01/08/2023	4	0.011	<0.0001	0.20	<0.01	<0.5	<2.0	5.1	<0.5	18	11	14	<2	114	1	<100	<0.05	<2	0.036
	01/11/2023	12							5.2		14	30	13		197	7				
	08/02/2024	7							5.2		10	13	16		198	4				
	16/05/2024	3							5.7		1	10	9		102	4				
Monitoring Point 15	01/08/2023	5	0.037	<0.0001	1.65	<0.01	<0.5	<0.5	5.0	<0.5	4	20	43	<2	146	4	<100	<0.05	<2	0.014
	01/11/2023	5							5.0		21	12	58		153	3				
	08/02/2024	4							5.1		20	10	50		135	3				
	16/05/2024	4							5.0		21	10	49		157	2				
Monitoring Point 16	01/08/2023	6	0.265	<0.0001	0.08	<0.01	<0.5	<0.5	5.2	<0.5	3	26	21	<2	113	1	<20	<0.05	<2	0.051
	01/11/2023	5							4.4		3	24	22		115	2				
	08/02/2024	5							4.9		4	23	27		139	1				
	16/05/2024	5							4.8		<1	22	25		132	2				

Table 2: Stormwater Results 2023-2024 Reporting Period

		Ammonia	Conductivity	Dissolved Oxygen	Faecal Coliforms	pH	Potassium	Redox Potential	Total Dissolved Solids	Total organic carbon
	Units	mg/L	µS/cm	mg/L	CFU/100mL	pH	mg/L	mV	mg/L	mg/L
Site Name	Sample Date									
Monitoring Point 8	01/08/2023	25.8	1430	6.61	20	7.6	46	93.0	751	27
	01/11/2023	13.8	1160	11.8	~4	8.5	51	140	650	41
	08/02/2024	0.02	320	20.4		9.6	19	69.0	292	21
	16/05/2024	7.65	1160	5.81		7.2	27	180	638	16

Table 3: Leachate Results 2023-2024 Reporting Period

		Alkalinity (as calcium carbonate)	Aluminium	Ammonia	Arsenic	Barium	Benzene	Cadmium	Calcium	Chloride	Chromium (Total)	Cobalt	Conductivity	Copper	Ethylbenzene	Fluoride	Lead	Magnesium	Manganese
	Units	mg/L	mg/L	mg/L	mg/L	mg/L	µg/L	mg/L	mg/L	mg/L	mg/L	mg/L	µS/cm	mg/L	µg/L	mg/L	mg/L	mg/L	mg/L
Site Name	Sample Date																		
Leachate	01/08/2023	1010	0.11	24.8	0.001	0.265	<1	<0.0001	108	86	<0.001	0.001	1780	0.012	<2	0.1	0.007	69	0.166
	01/11/2023												1100						
	08/02/2024												976						
	16/05/2024												1690						

		Mercury	Nitrate as N	Nitrite as N	Organochlorine Pesticides	Organophosphate Pesticides	pH	Polycyclic aromatic hydrocarbons	Potassium	Sodium	Sulfate	Toluene	Total Dissolved Solids	Total organic carbon	Total Petroleum Hydrocarbons	Total Phosphorus as P	Total suspended solids	Xylene	Zinc
	Units	mg/L	mg/L	mg/L	mg/L	mg/L	pH	µg/L	mg/L	mg/L	mg/L	µg/L	mg/L	mg/L	mg/L	mg/L	mg/L	µg/L	mg/L
Site Name	Sample Date																		
Leachate	01/08/2023	<0.0001	2.07	0.52	<0.5	<0.5	7.8	<0.5	49	146	30	<2	816	26	<100	0.10	20	<2	0.085
	01/11/2023																		
	08/02/2024																		
	16/05/2024																		

Table 4: Trade Waste Results 2023-2024 Reprting Period

Date Sampled (Date)		14/06/2023	15/06/2023	02/08/2023	03/10/2023	04/10/2023	04/12/2023	05/12/2023	06/02/2024	07/02/2024	02/04/2024	03/04/2024
Compound Name	Units											
Ammonia	mg/L		35.8	20.4		2.5		0.		3.1		2.
Filterable iron	mg/L		32.3	2.82		5.01		13.3		3.97		0.69
Finish Time	hrs		0.	0.		0.		0.		0.		0.
Temperature	°C		16.	15.		18.		23.		23.		17.
Total Dissolved Solids (Calc.)	mg/L		1,290.	1,080.		734.		636.		582.		410.
Total suspended solids	mg/L		60.	12.		9.		21.		15.		8.
Volume Discharged	kL		0.21	0.18		0.14		0.12		0.13		0.14
Volume Discharged (corrected)	kL		0.21	0.18		0.14		0.12		0.13		0.14
Meter Reading (start)	kL		71,335.3	71,343.54		71,351.75		71,359.07		71,367.21		71,376.5
Meter Reading (finish)	kL		71,335.51	71,343.72		71,351.89		71,359.19		71,367.34		71,376.64
pH (start)	pH	7.4			7.9		7.4		7.4		7.5	
pH (finish)	pH		7.4	7.8		8.2		7.4		7.5		7.4
Ammonia kg/day	kg/day		0.00752	0.00367		0.00035		0.		0.0004		0.00028
Filterable iron kg/day	kg/day		0.00678	0.00051		0.0007		0.0016		0.00052		0.0001
Total Dissolved Solids (Calc.) kg/day	kg/day		0.2709	0.1944		0.10276		0.07632		0.07566		0.0574
Total suspended solids kg/day	kg/day		0.0126	0.00216		0.00126		0.00252		0.00195		0.00112

Table 5: Subsurface Gas Results 2023-2024 Reporting Period

			CH4	CH4 Peak	CO2	CO2 Peak	SWL
Units			%v/v	%v/v	%v/v	%v/v	Meters
Monitoring Point ID	Sample ID						
17	LGB5	15/08/2023	0.1	0.1	8.2	8.2	4.52
		13/11/2023	<0.1	0.1	4.1	4.1	DRY
		7/02/2024	<0.1	<0.1	6.8	6.8	DRY
		16/05/2024	<0.1	<0.1	4.8	4.8	3.82
18	LGB6	15/08/2023	0.1	0.1	0.6	7.7	2.97
		13/11/2023	<0.1	<0.1	0.5	3.6	3.14
		7/02/2024	<0.1	<0.1	0.5	7	2.8
		16/05/2024	<0.1	<0.1	0.3	4.6	2.16
19	LGB7	15/08/2023	<0.1	<0.1	4	4	3.24
		13/11/2023	<0.1	<0.1	6.3	6.3	3.55
		7/02/2024	<0.1	<0.1	4	4.3	3.08
		16/05/2024	<0.1	<0.1	0.5	2.5	2.51
20	LGB8	15/08/2023	0.1	0.1	1.1	3.6	2.92
		13/11/2023	<0.1	<0.1	0.5	5.6	2.87
		7/02/2024	<0.1	<0.1	0.4	3.7	2.7
		16/05/2024	<0.1	<0.1	0.2	0.6	1.46
21	LGB9	15/08/2023	<0.1	0.1	2.7	2.7	3.38
		13/11/2023	<0.1	<0.1	1	1	3.97
		7/02/2024	<0.1	<0.1	3.1	3.1	3.62
		16/05/2024	<0.1	<0.1	1.1	1.2	1.45
4	LFGMB1	15/08/2023	<0.1	0.1	9	9	2.42
		13/11/2023	<0.1	<0.1	3.2	3.2	2.66
		7/02/2024	<0.1	<0.1	8.7	8.7	2.14
		16/05/2024	<0.1	<0.1	0.3	0.3	1.40

Table 6: Surface Gas Results 2023-2024 Reporting Period

Client	Wollongong City Council		Date	16/08/2023	
Site	Helensburgh Landfill				
Transact / Location	Point	GPS North	GPS East	CH4 Conc (ppm)	Comments
A	1	6216108	315933	2.3	----

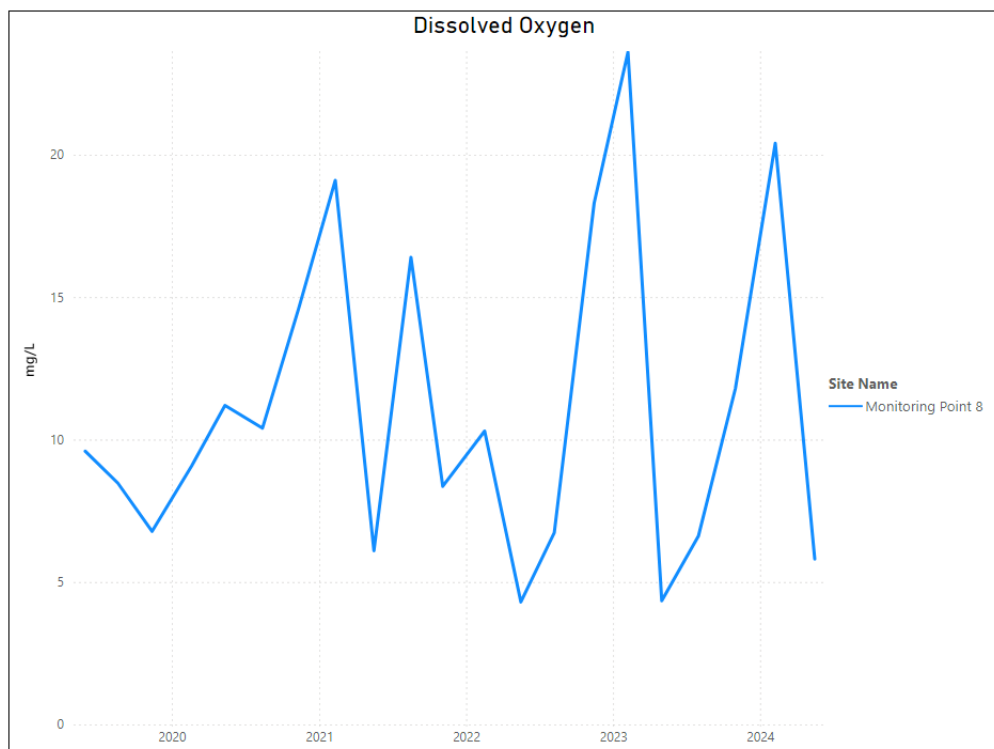
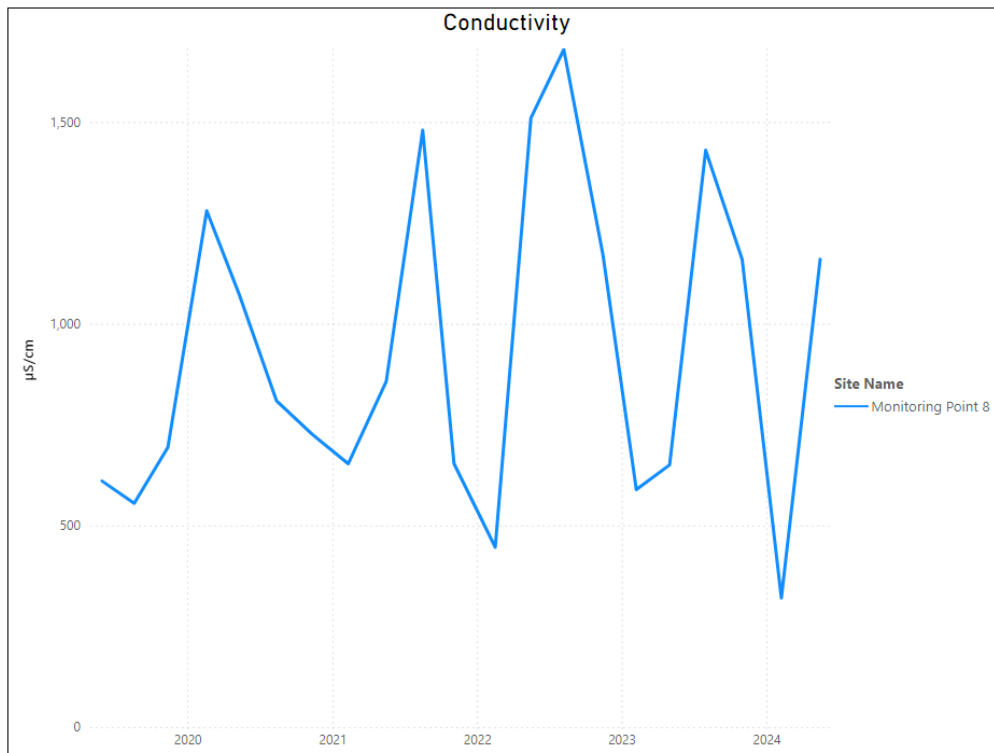
A	2	6216105	315903	2.3	----
A	3	6216107	315862	2.3	----
A	4	6216108	315838	2.3	----
A	5	6216110	315809	2.3	----
A	6	6216109	315788	2.3	----
B	1	6216125	315810	2.6	----
B	2	6216121	315835	2.6	----
B	3	6216118	315870	2.6	----
B	4	6216117	315904	2.6	----
B	5	6216119	315927	2.6	----
C	1	6216128	315789	2.3	----
C	2	6216155	315780	2.3	----
C	3	6216180	315771	2.9	----
C	4	6216205	315763	2.5	----
----	----	----	----	----	No Access Heavily Overgrown
----	----	----	----	----	No Access Heavily Overgrown
F	1	6216380	315653	2.4	----
F	2	6216385	315663	2.4	----
F	3	6216386	315670	2.5	----
F	4	6216387	315689	2.5	----
F	5	6216384	315704	2.4	----
F	6	6216381	315712	2.4	----
F	7	6216374	315729	2.4	----
F	8	6216368	315744	2.5	----
G	1	6216143	315934	2.6	----
G	2	6216179	315933	2.6	----
G	3	6216211	315931	2.6	----
G	4	6216250	315920	2.6	----
G	5	6216290	315920	2.6	----
G	6	6216330	315943	2.6	----
G	7	6216366	315953	2.6	----
H	1	6216203	315878	2.5	----
----	----	----	----	----	No Access Heavily Overgrown
H	6	6216324	315872	2.5	----
H	7	6216335	315872	2.5	----
H	8	6216344	315875	2.5	----
I	1	6216202	315876	26.9	----
----	----	----	----	----	No Access Heavily Overgrown
I	6	6216322	315862	2.5	----
I	7	6216331	315858	2.5	----
I	8	6216348	315851	2.5	----

J	1	6216347	315848	2.5	----
J	2	6216325	315851	2.5	----
J	3	6216309	315849	2.5	----
J	4	6216291	315852	3.4	----
J	5	6216268	315856	4.2	----
J	6	6216249	315858	8.4	----
J	7	6216216	315859	2.9	----
K	1	6216399	315651	2.6	----
K	2	6216412	315679	2.6	----
K	3	6216424	315724	2.6	----
K	4	6216427	315754	2.6	----
K	5	6216429	315767	2.6	----
K	6	6216436	315809	2.6	----
K	7	6216436	315828	2.6	----
L	1	6216415	315646	2.6	----
L	2	6216432	315663	2.6	----
L	3	6216432	315698	2.6	----
L	4	6216445	315741	2.6	----
L	5	6216447	315763	2.6	----
L	6	6216445	315780	2.6	----
L	7	6216458	315810	2.6	----
M	1	6216481	315813	2.6	----
M	2	6216481	315789	2.6	----
M	3	6216465	315747	2.6	----
M	4	6216456	315714	2.6	----
M	5	6216450	315677	2.6	----
M	6	6216438	315655	2.6	----
M	7	6216430	315629	2.6	----
----	----	----	----	----	No Access Heavily Overgrown
----	----	----	----	----	No Access Heavily Overgrown
P	1	6216371	315941	2.6	----
P	2	6216371	315927	2.5	----
P	3	6216372	315914	2.5	----
P	4	6216376	315904	2.5	----
P	5	6216374	315898	2.5	----
P	6	6216374	315877	2.5	----
P	7	6216357	315850	2.5	----
Weighbridge Office	1	6216128	315587	2.4	----
Q	1	6216092	315446	2.6	----
Q	2	6215996	315436	2.6	----
Q	3	6216231	315544	2.6	----
Q	4	6216165	315538	2.6	----

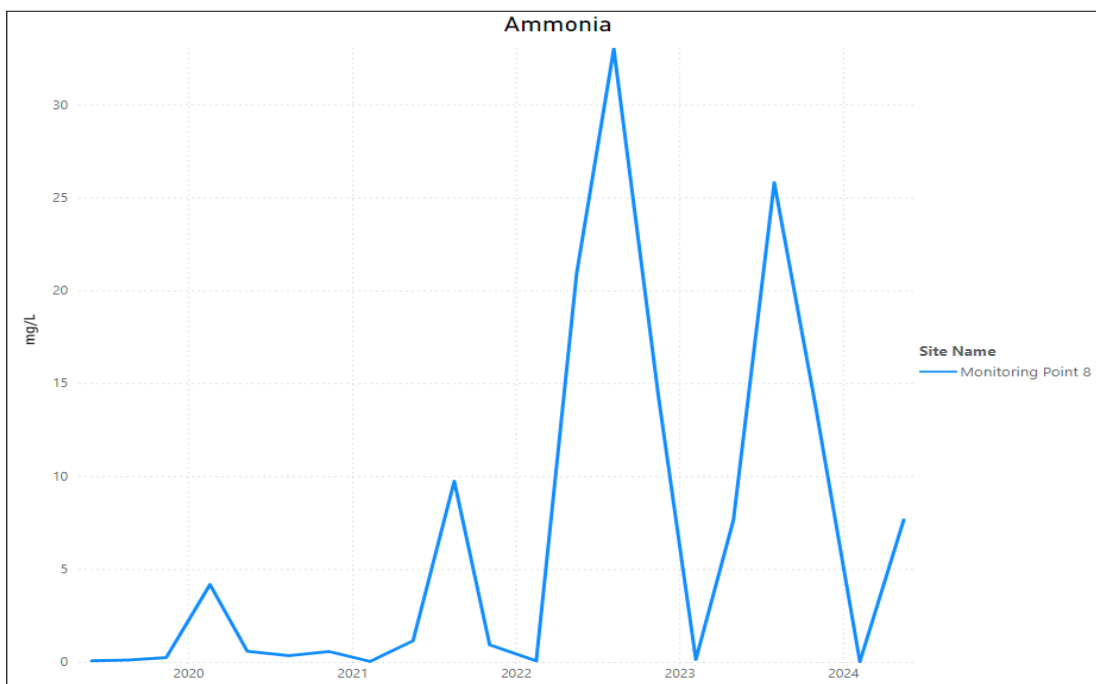
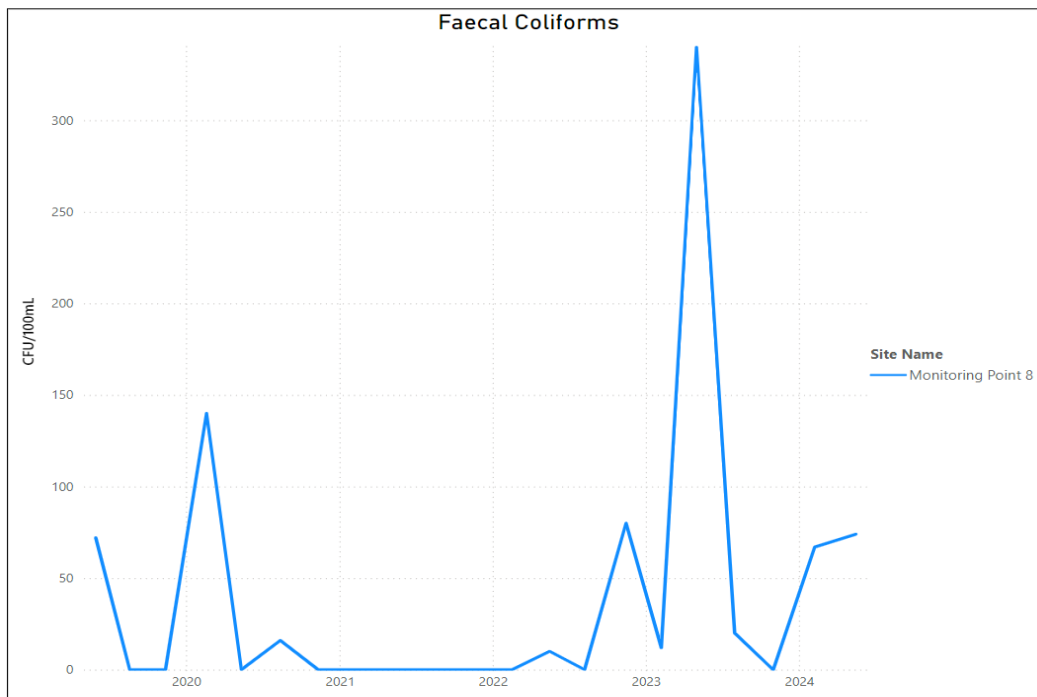
Q	5	6216143	315521	2.6	----
Q	6	6216333	315510	2.6	----
Methane Blank	Pre Testing 1	Taken at Entrence	Taken at Entrence	2.3	----
Methane Blank	Post Testing 1	Taken at Entrence	Taken at Entrence	2.3	----

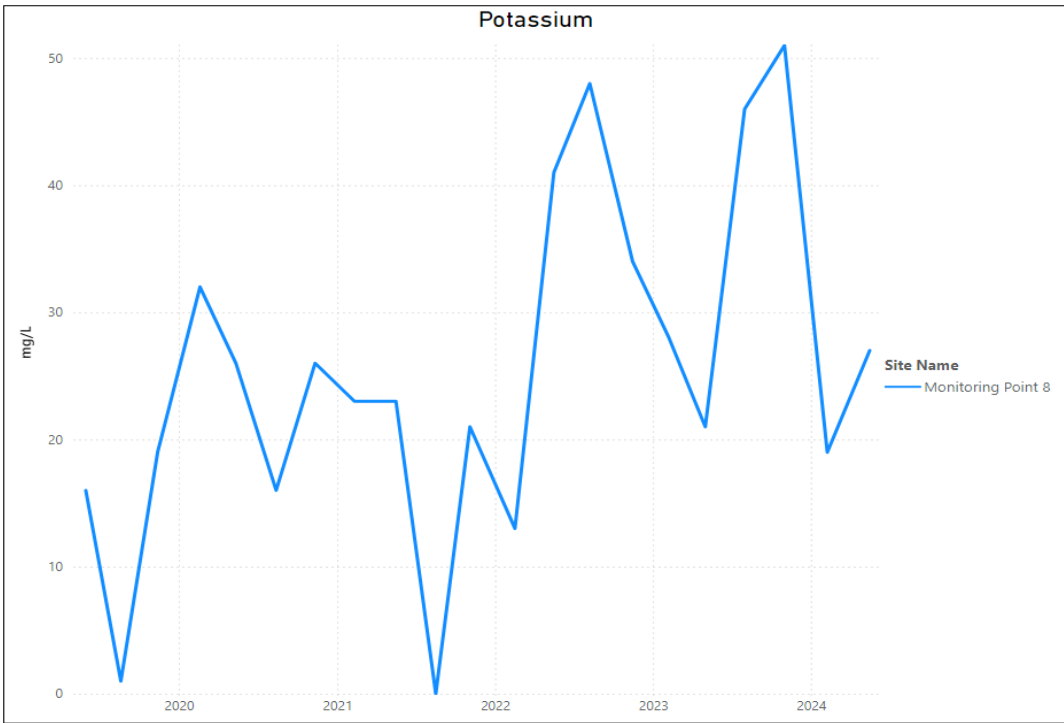
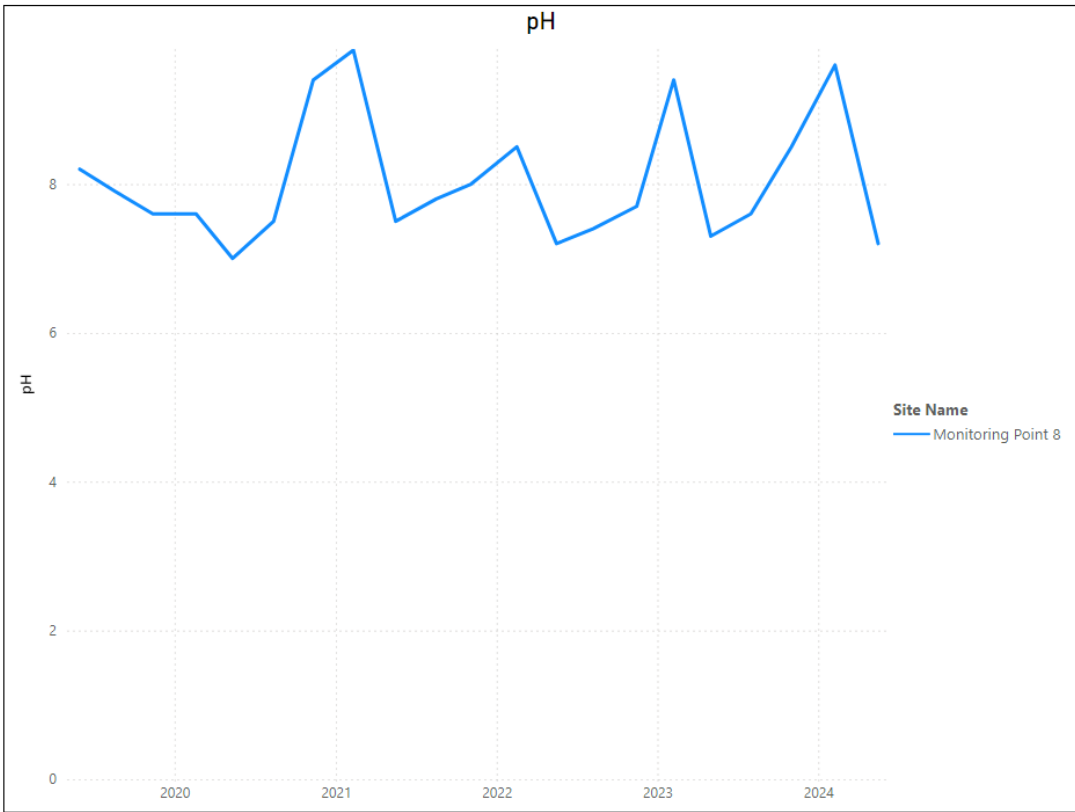
## Appendix B

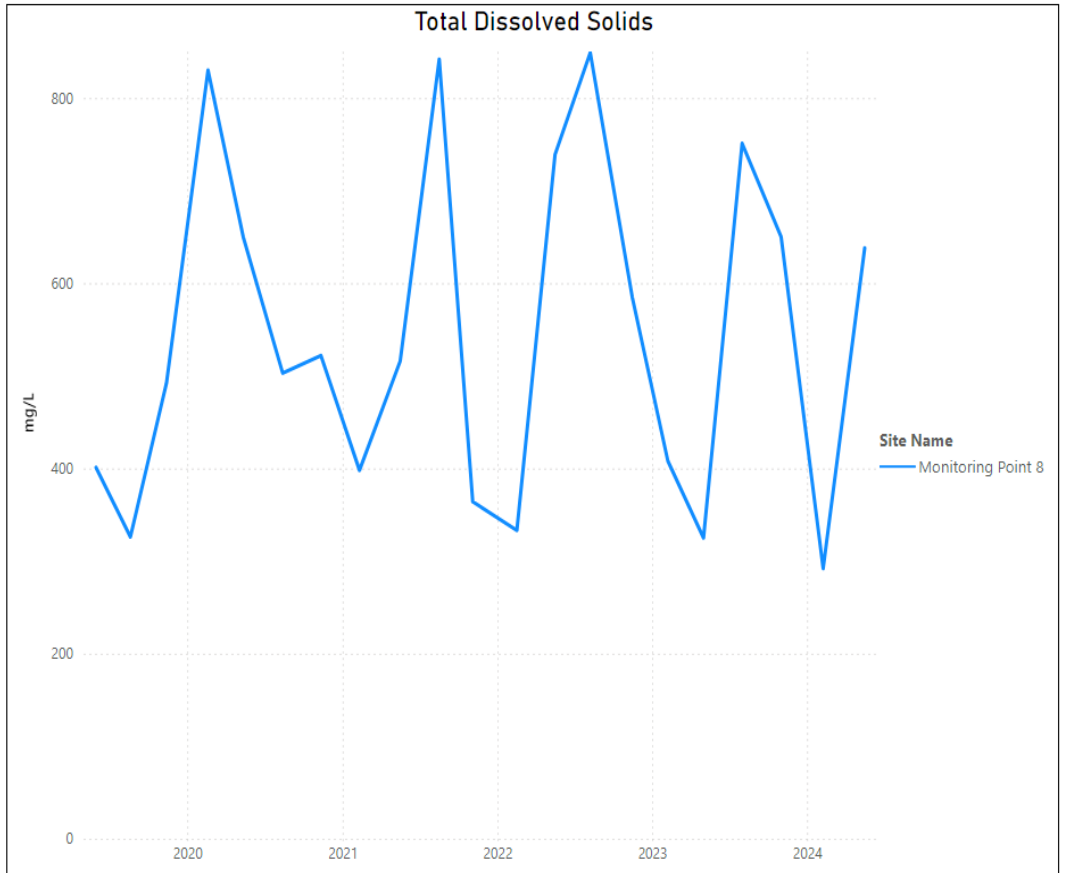
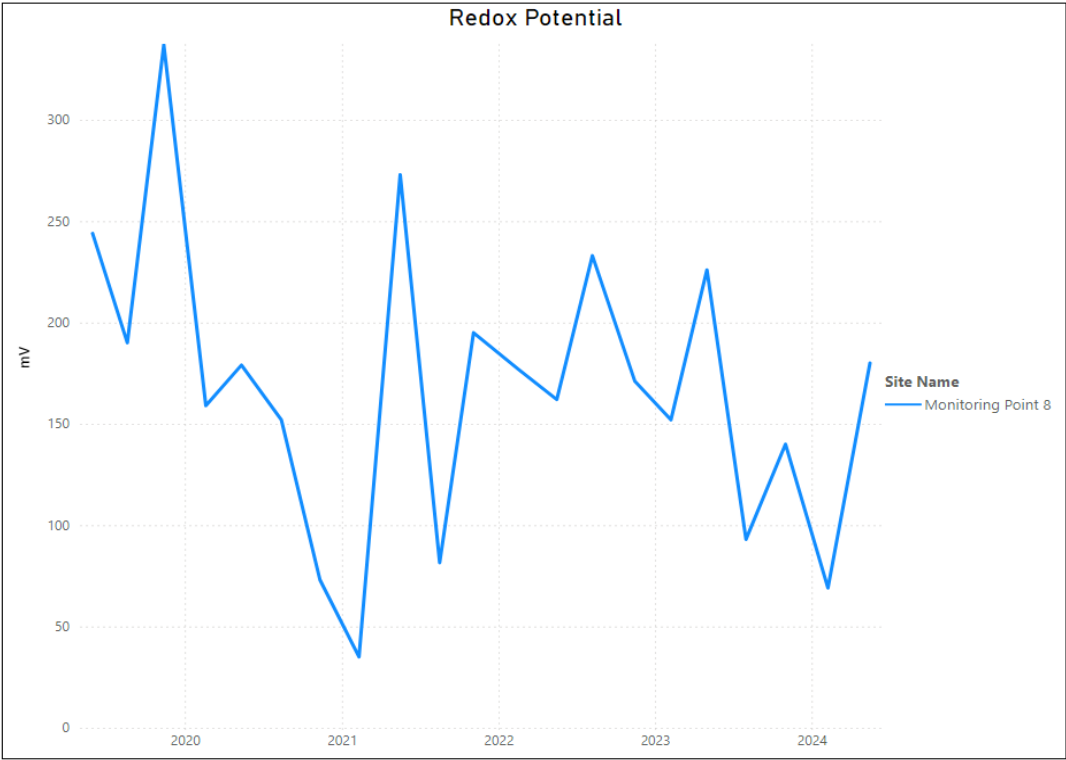
### Helensburgh Surface Water Annual Results 2023/24

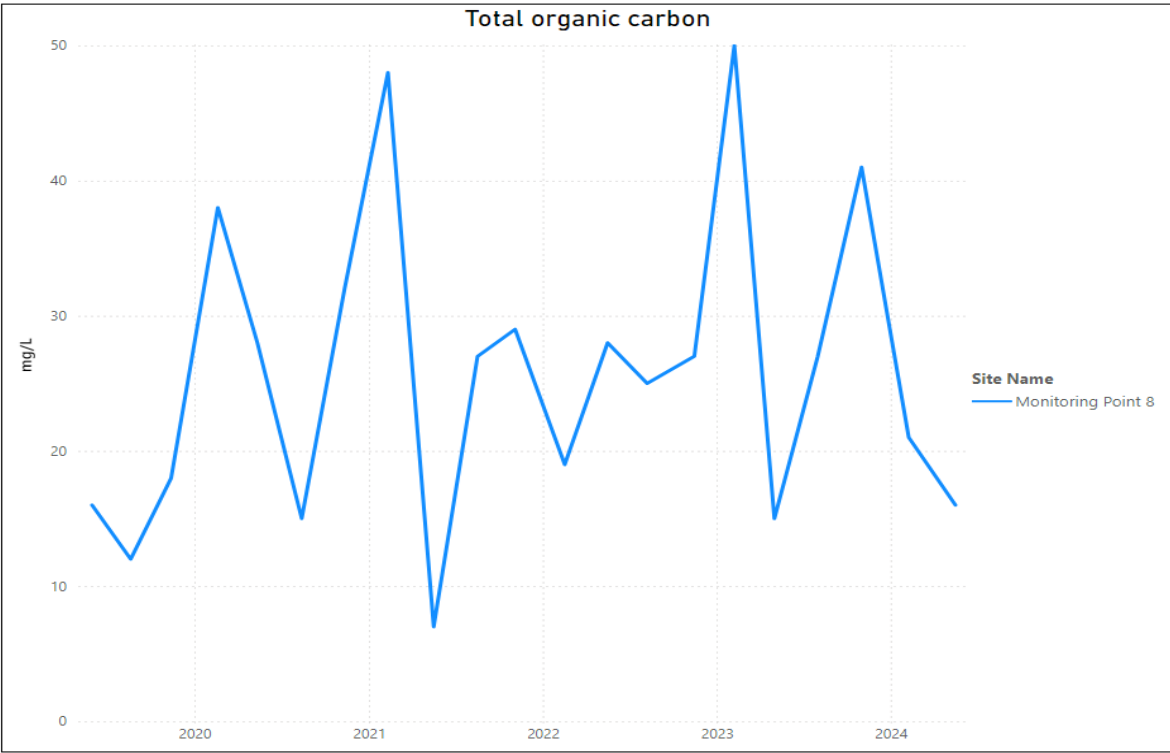




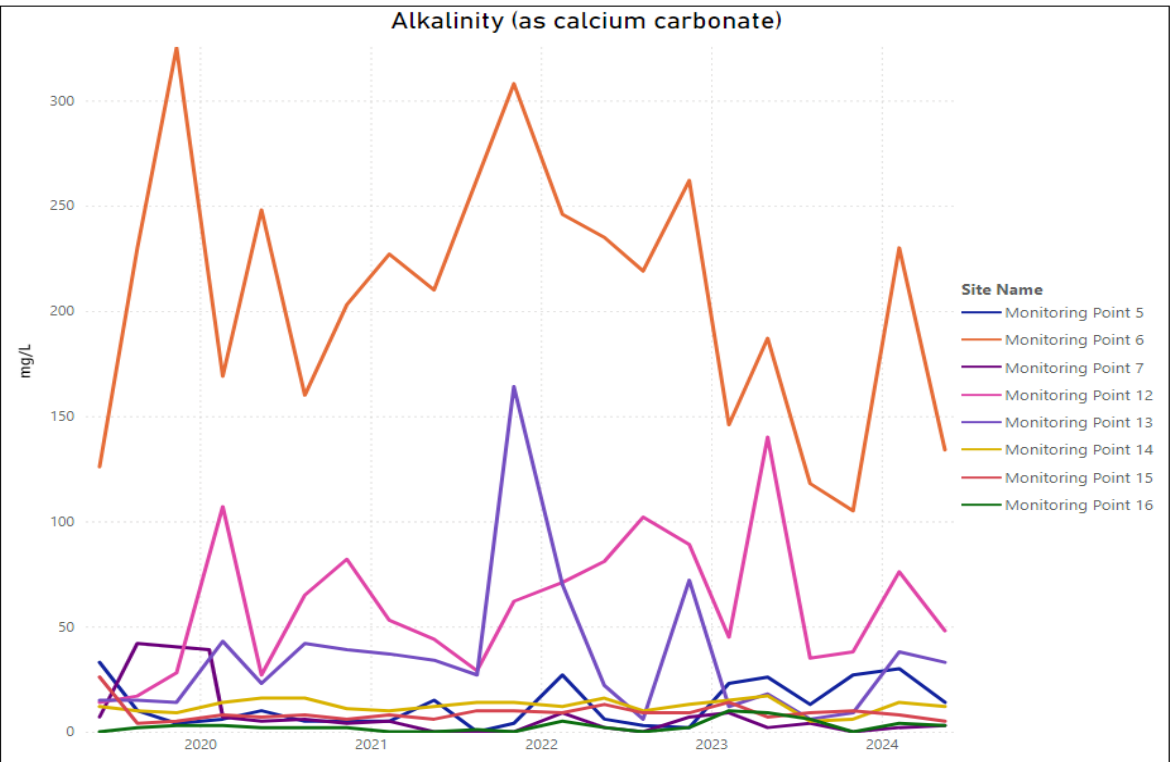


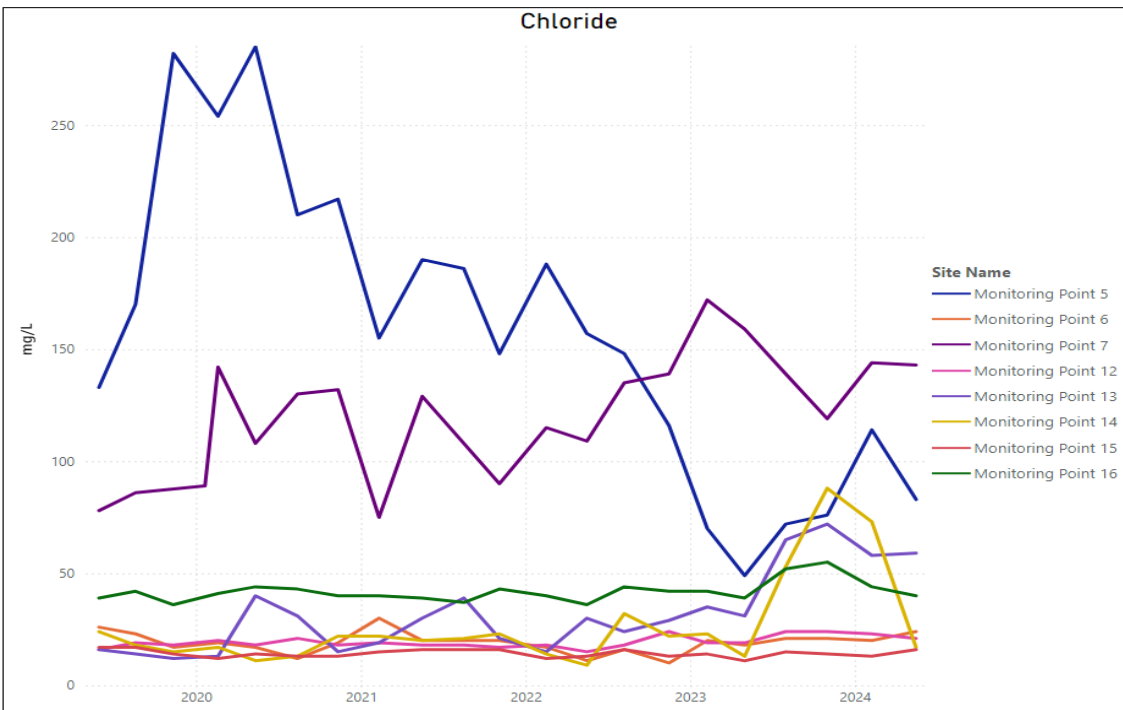
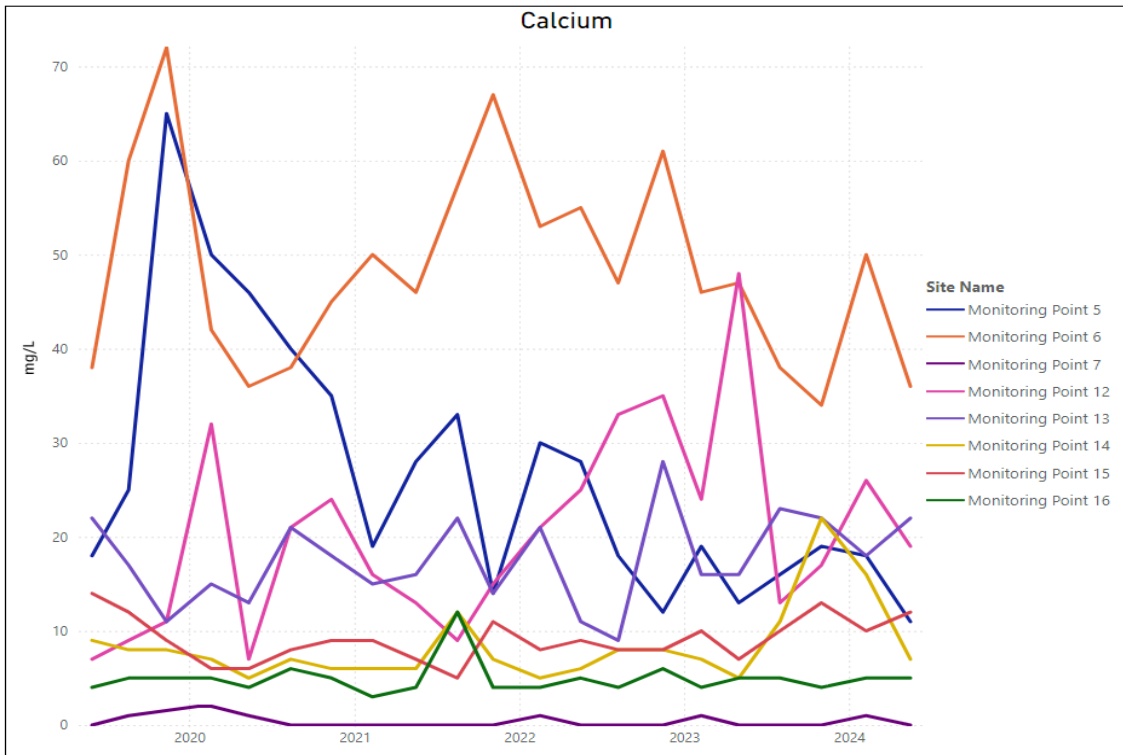


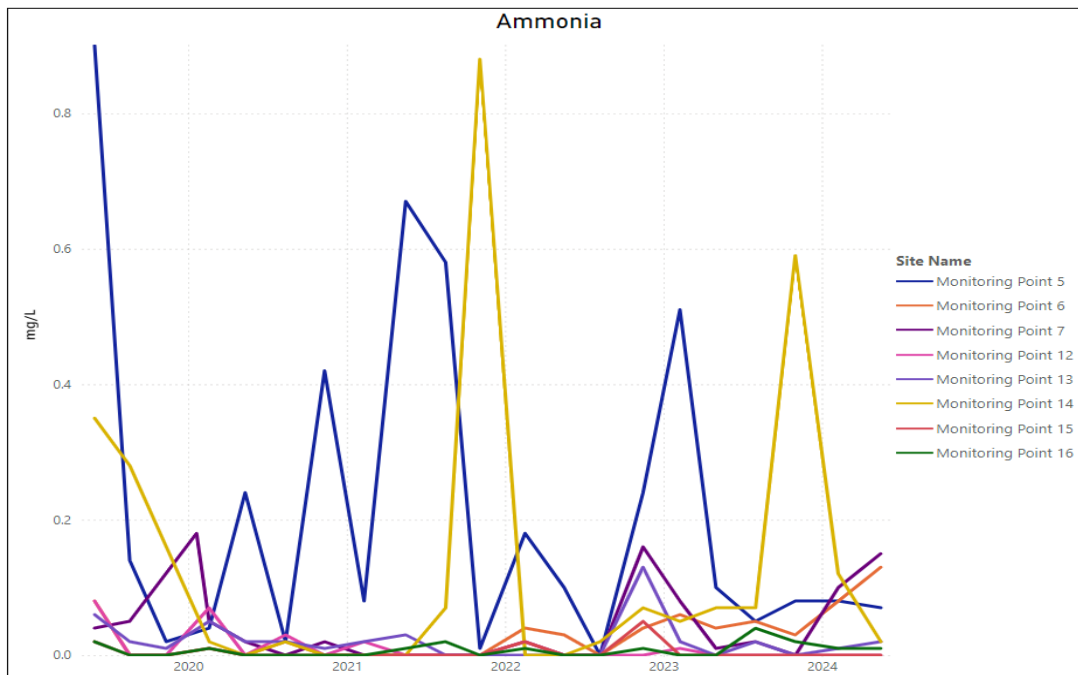
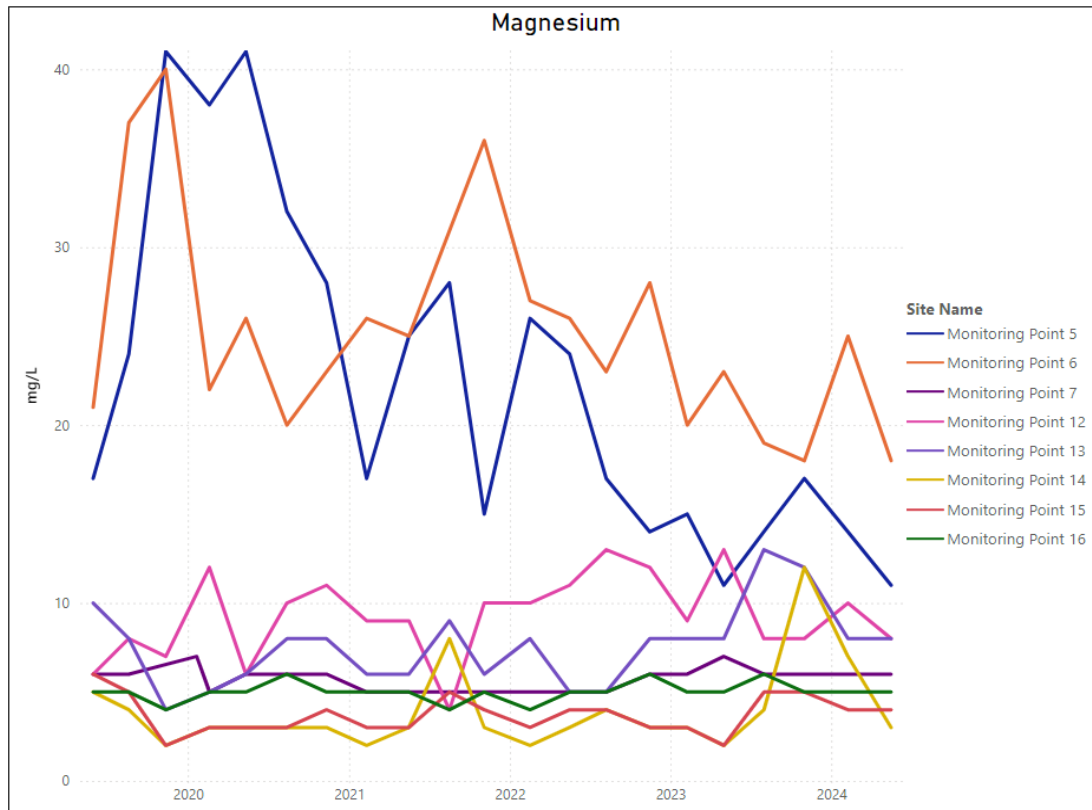


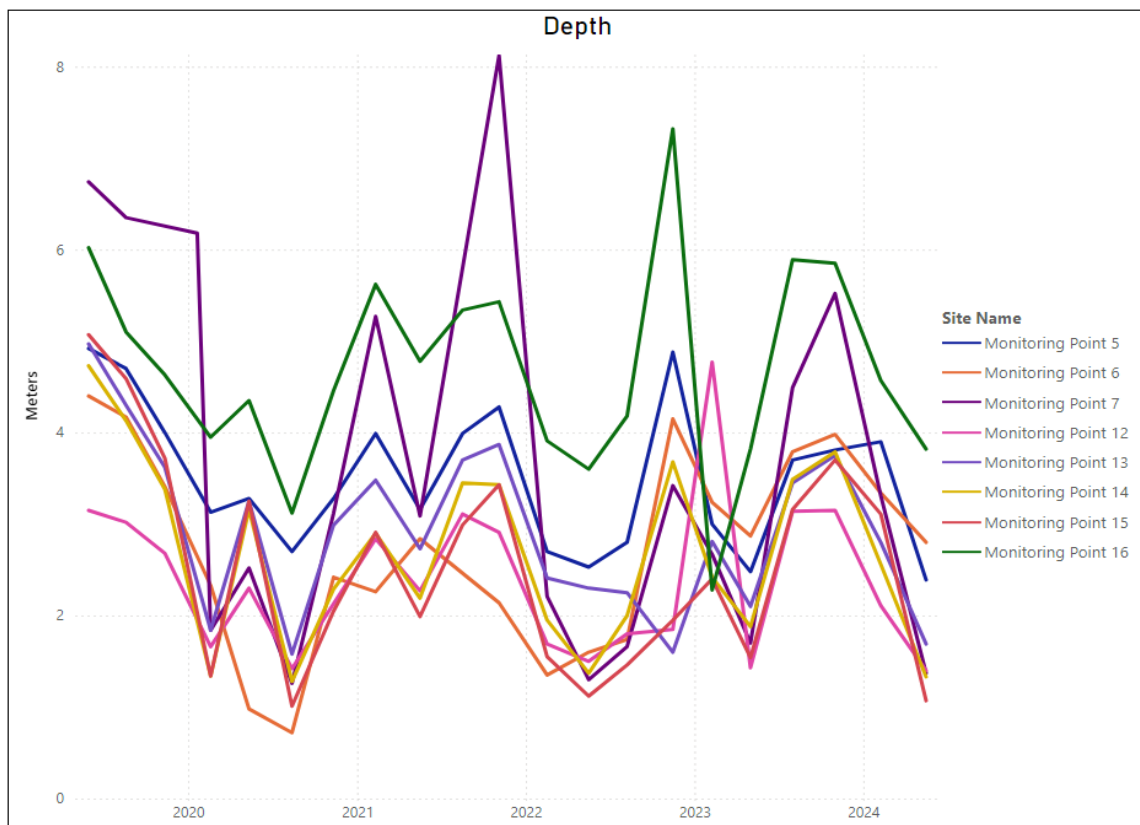
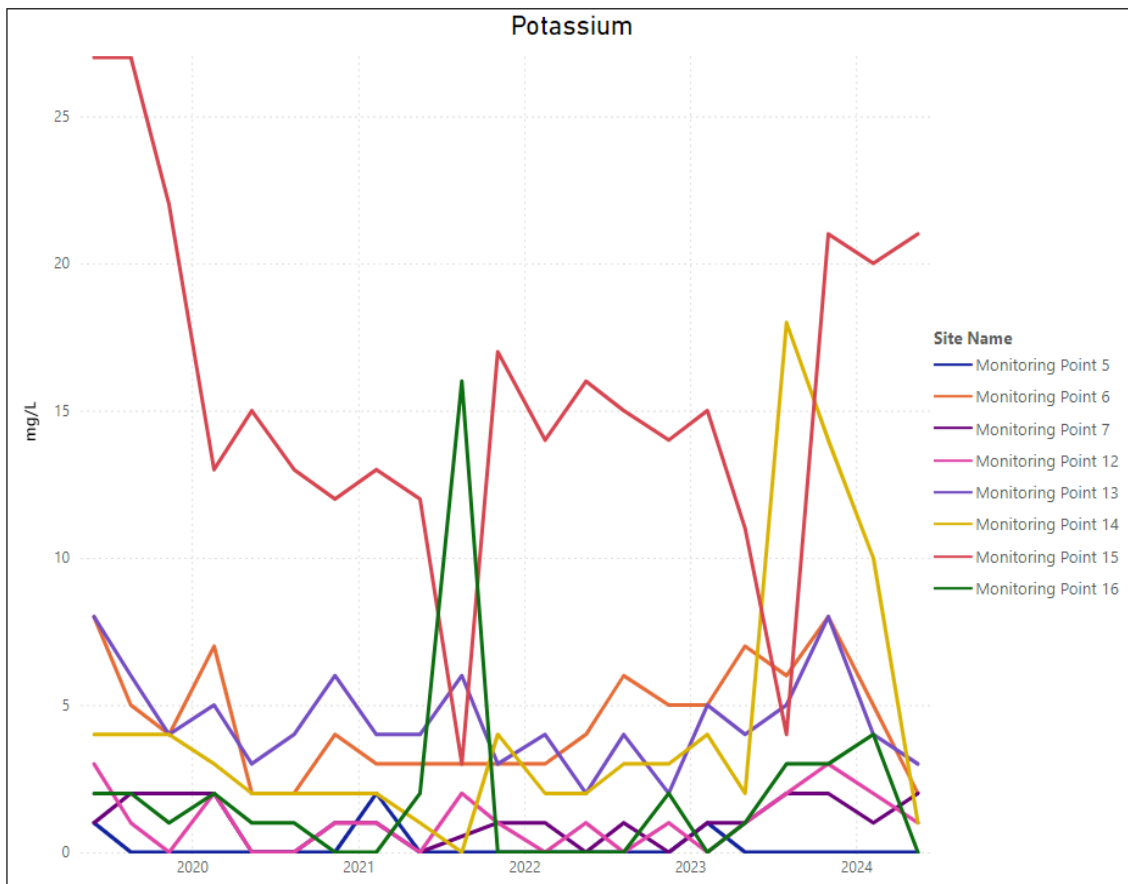


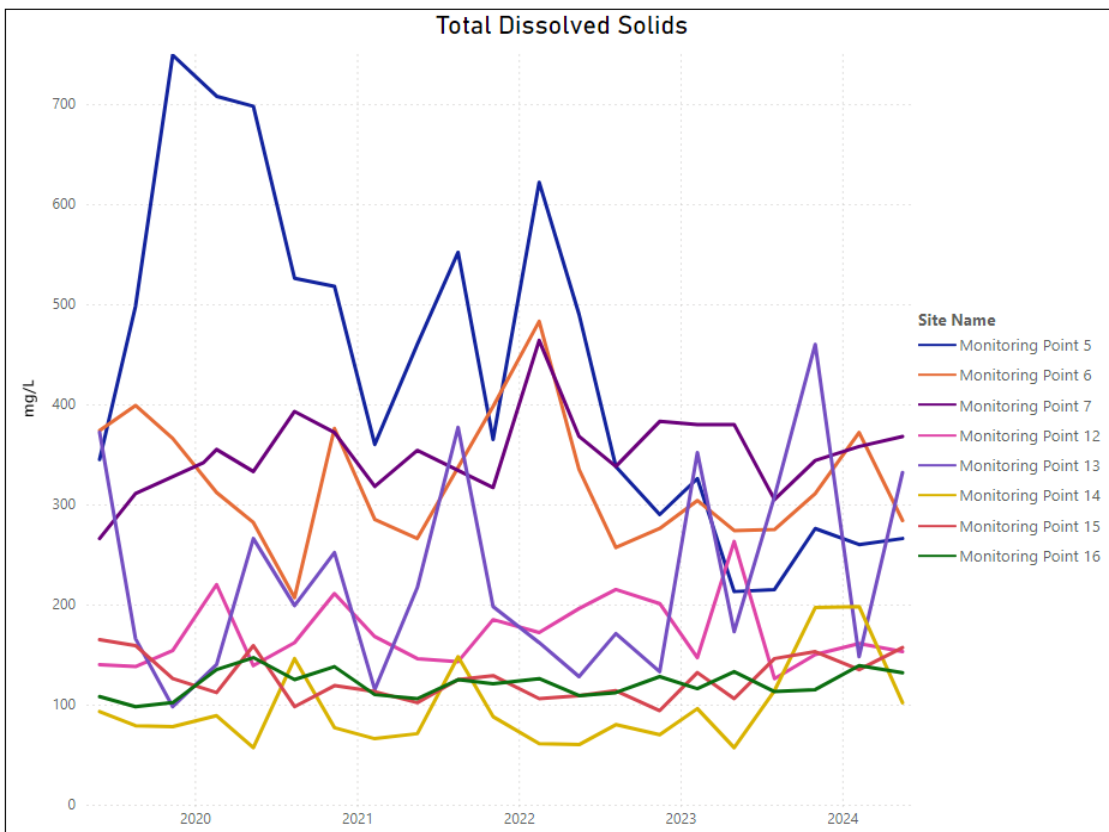
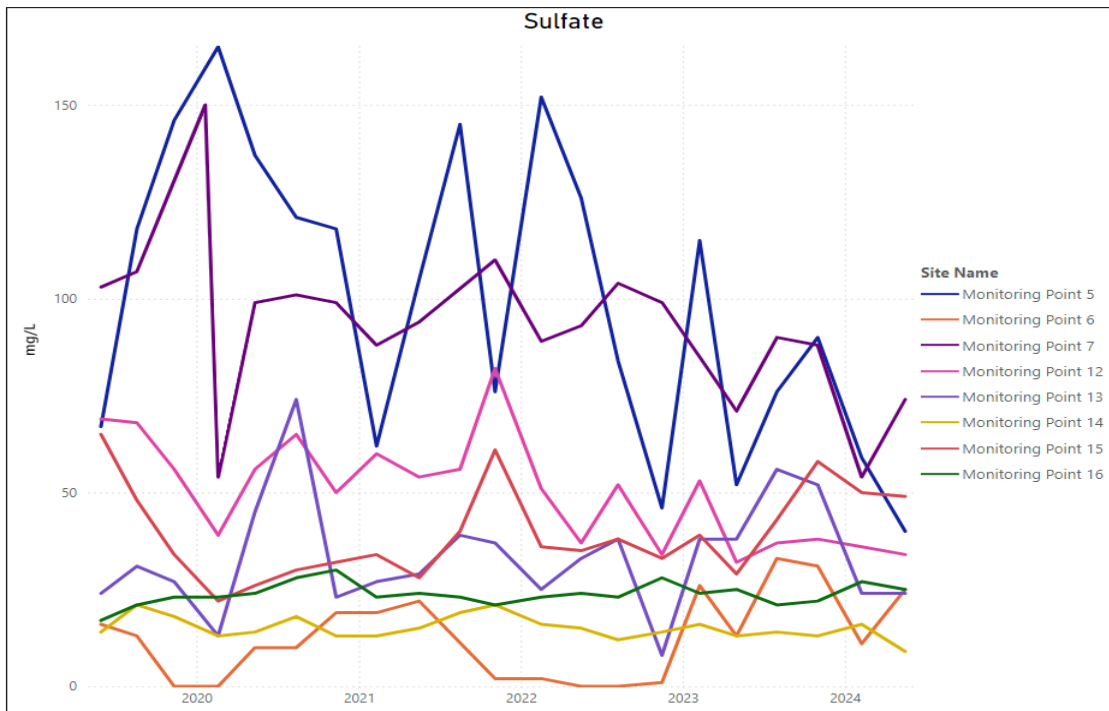
**Helensburgh Quarterly Groundwater Results 2023/24**



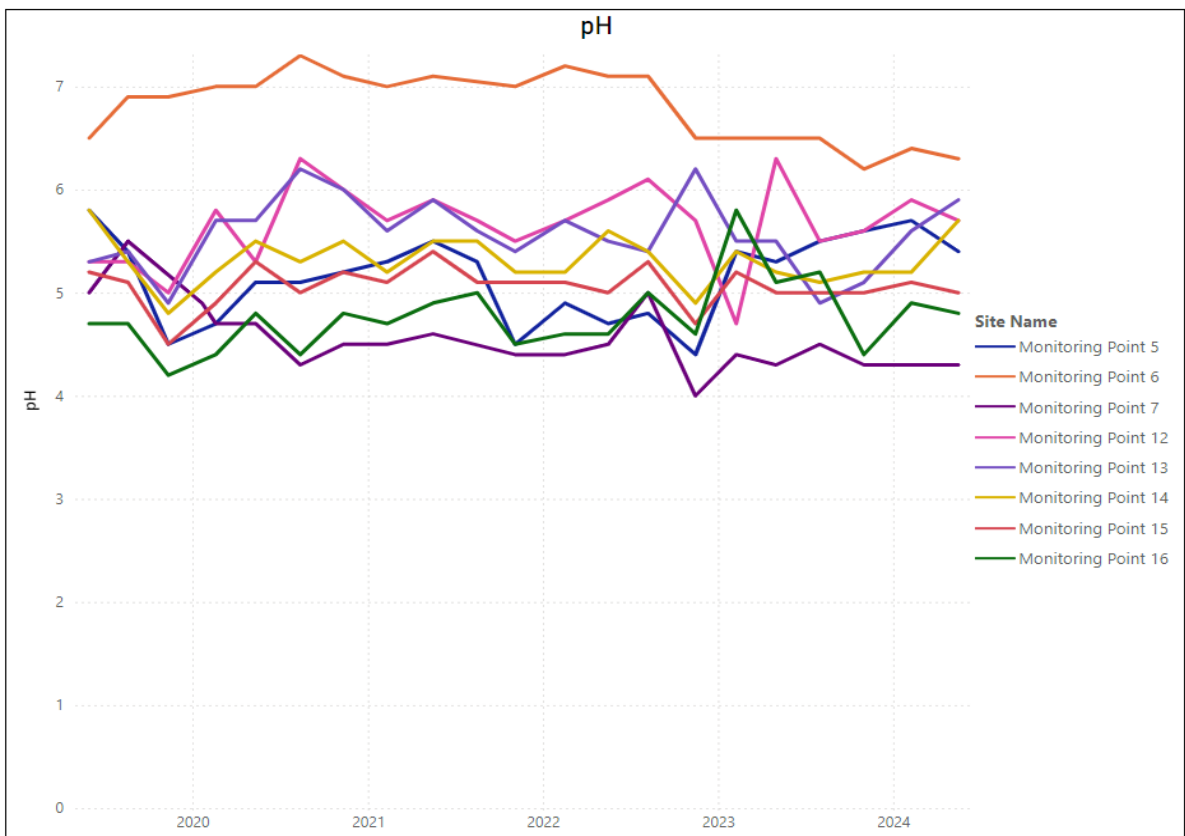
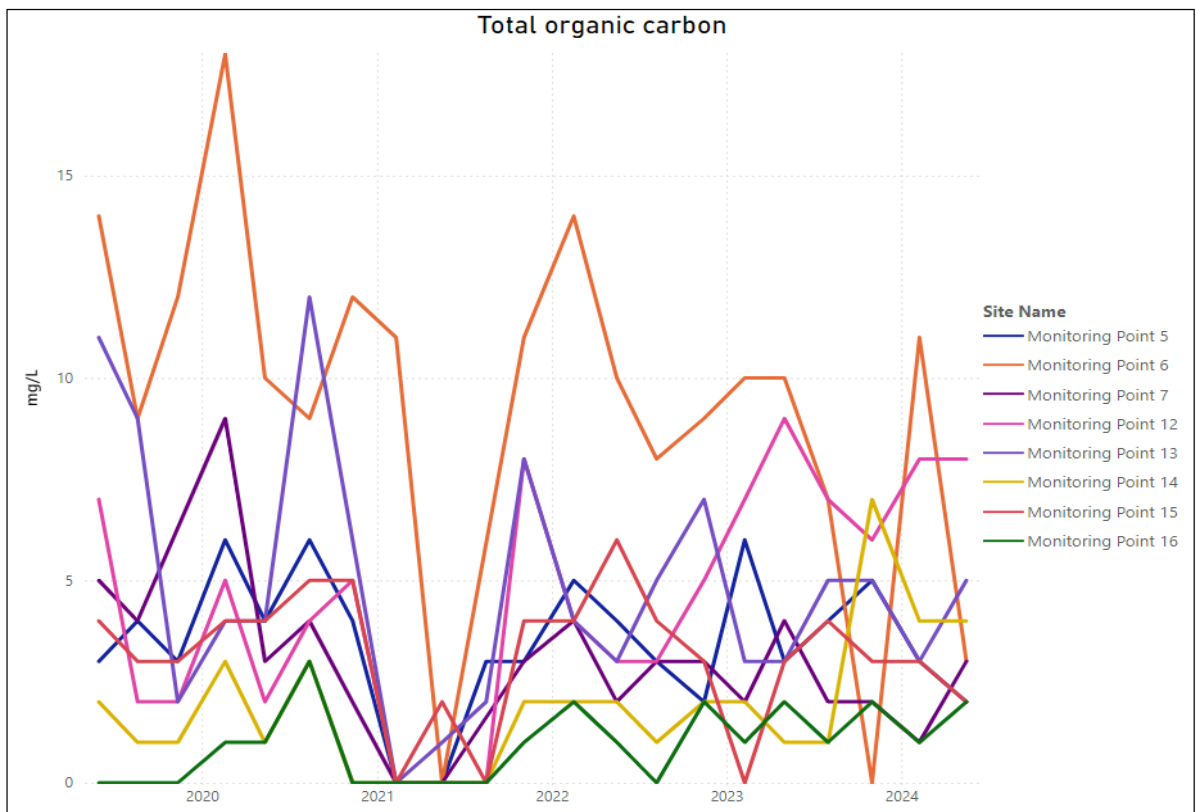




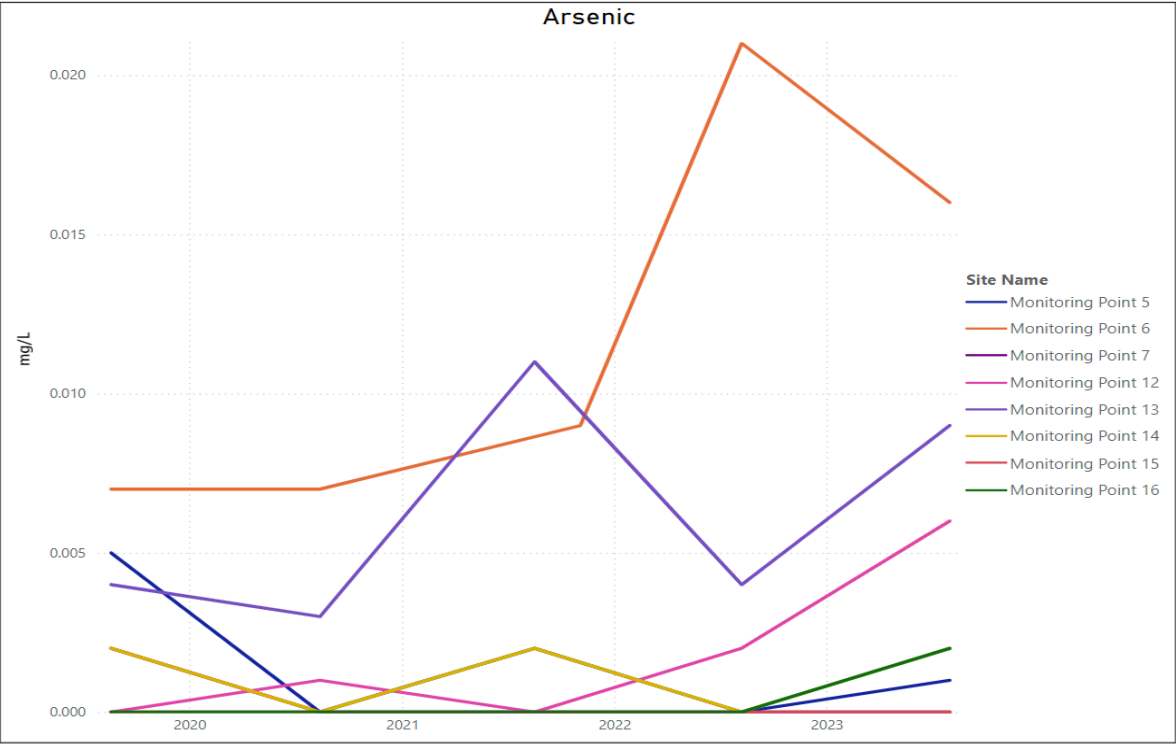
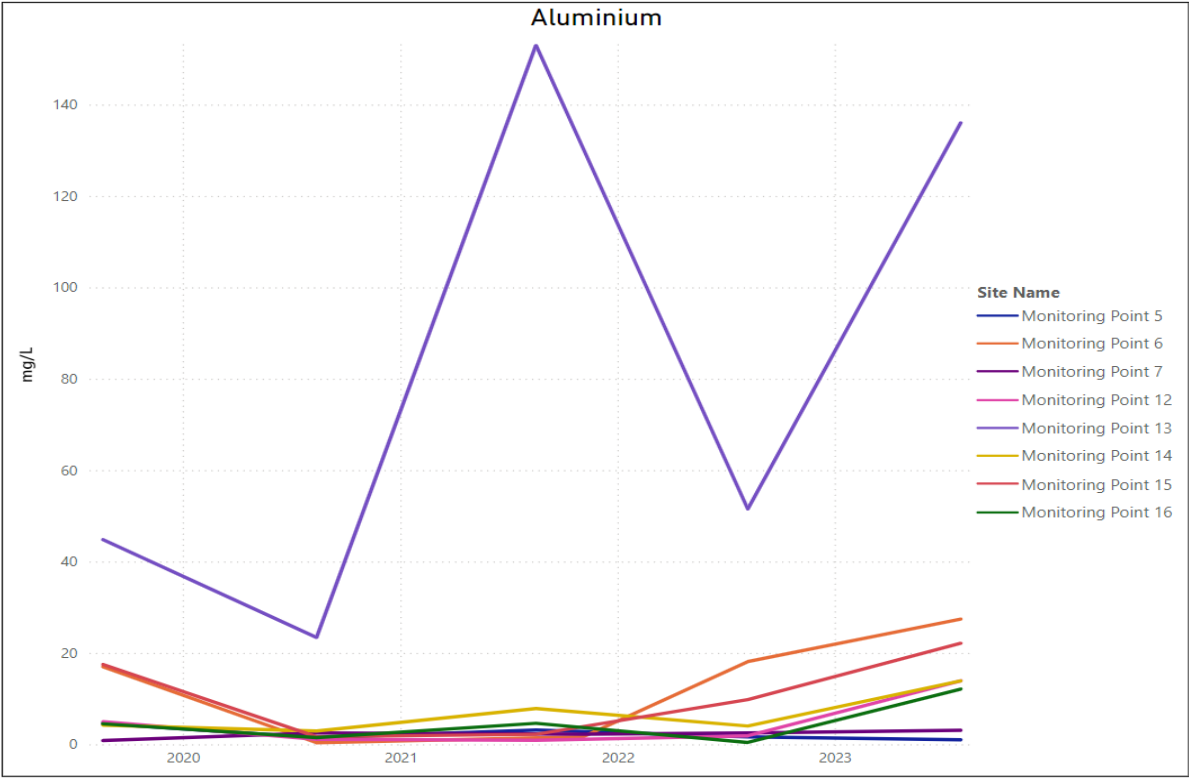


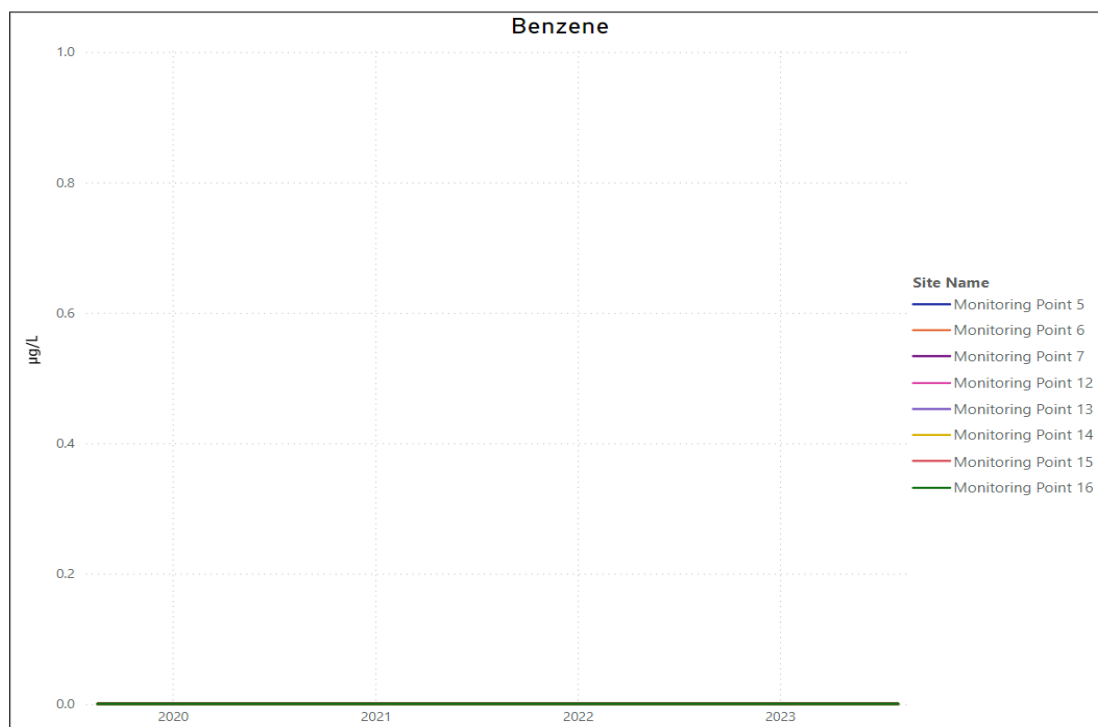
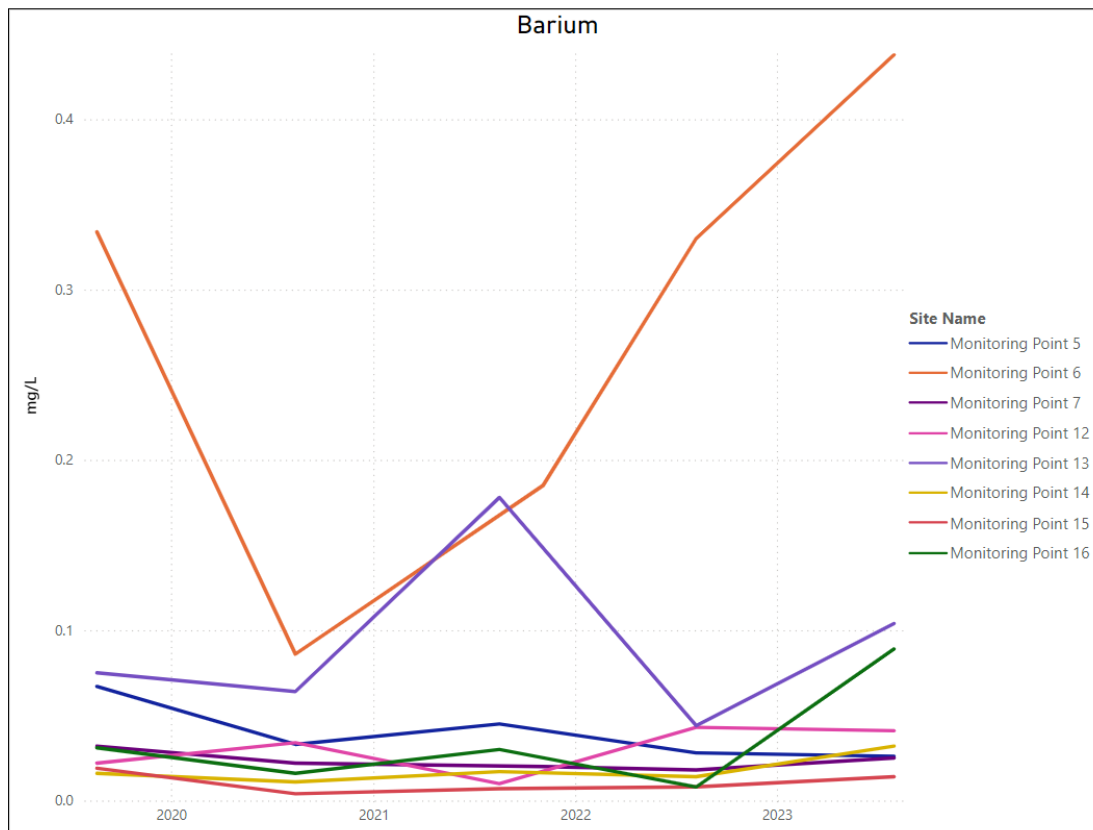


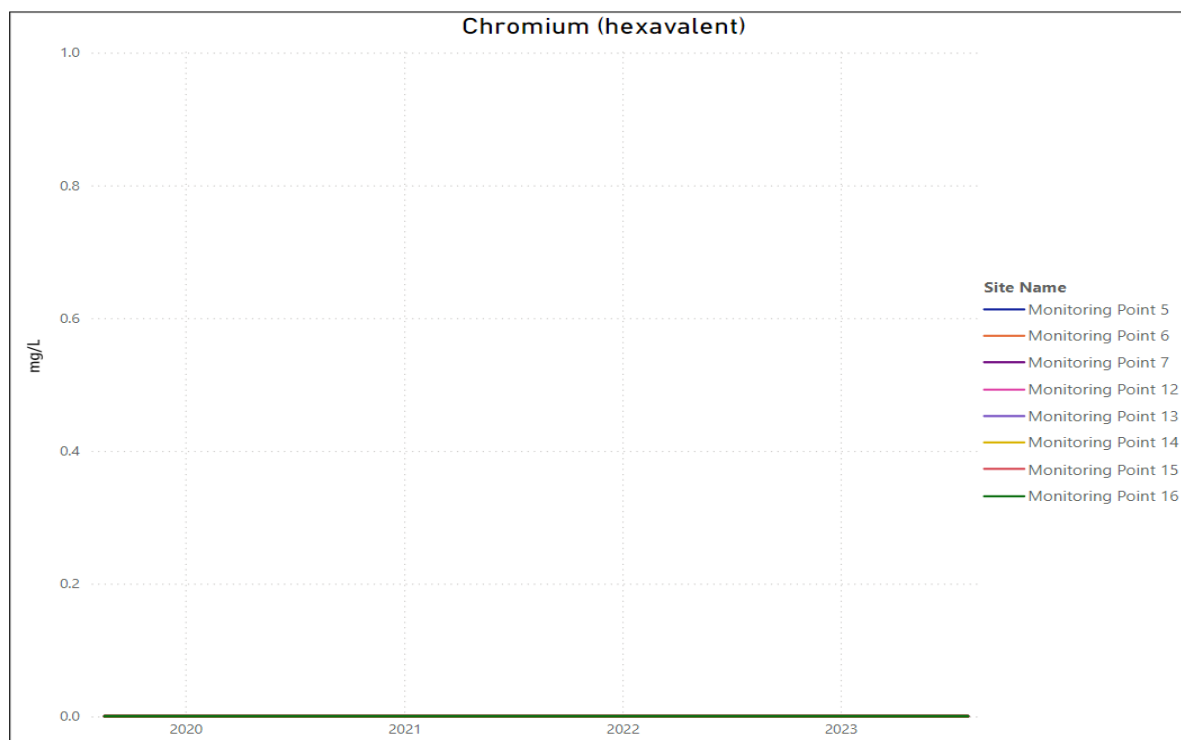
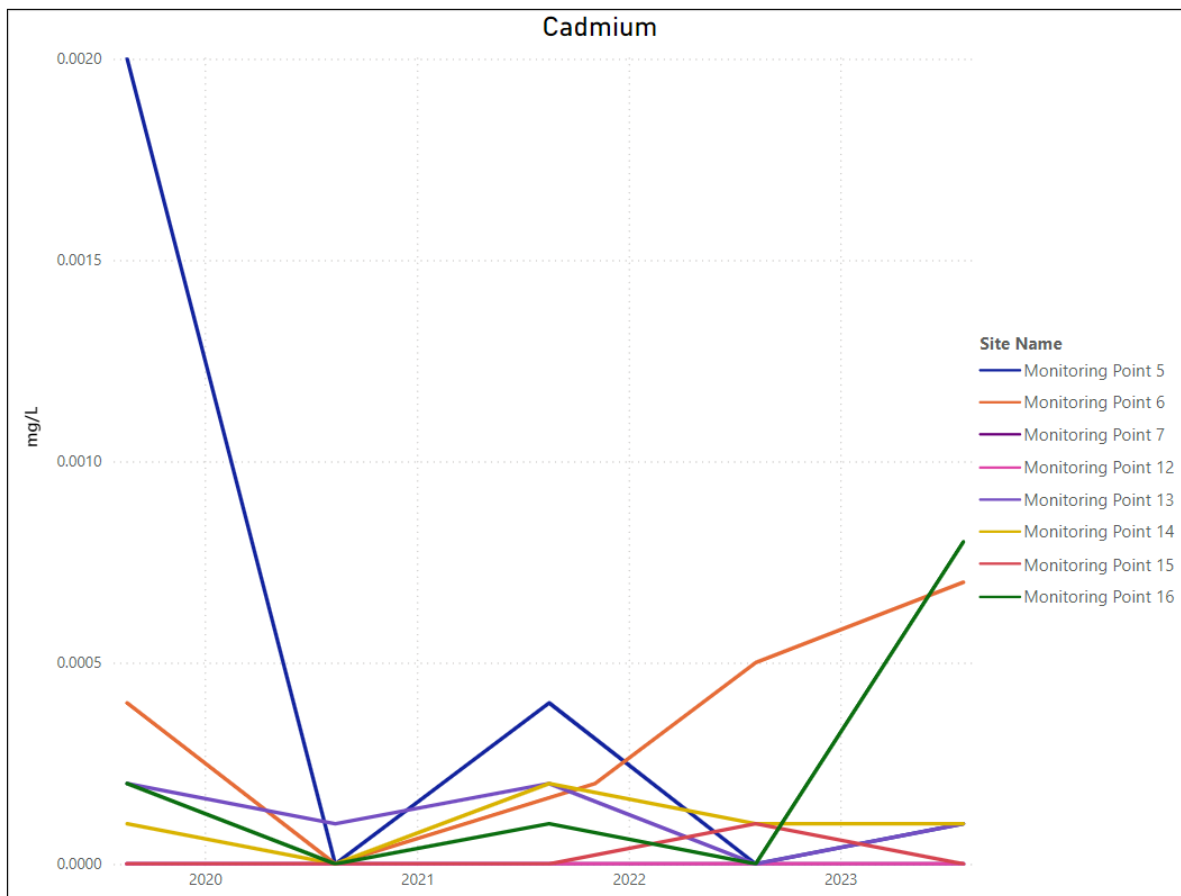


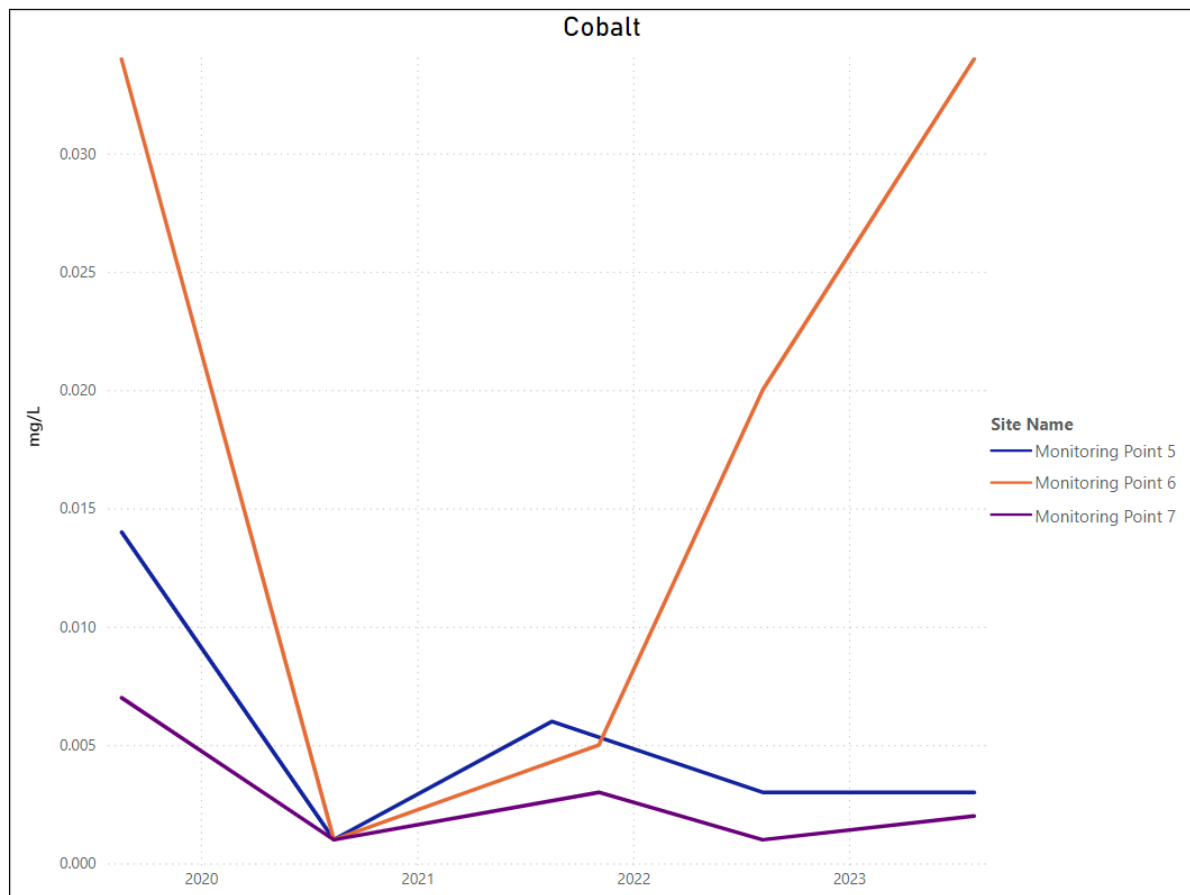
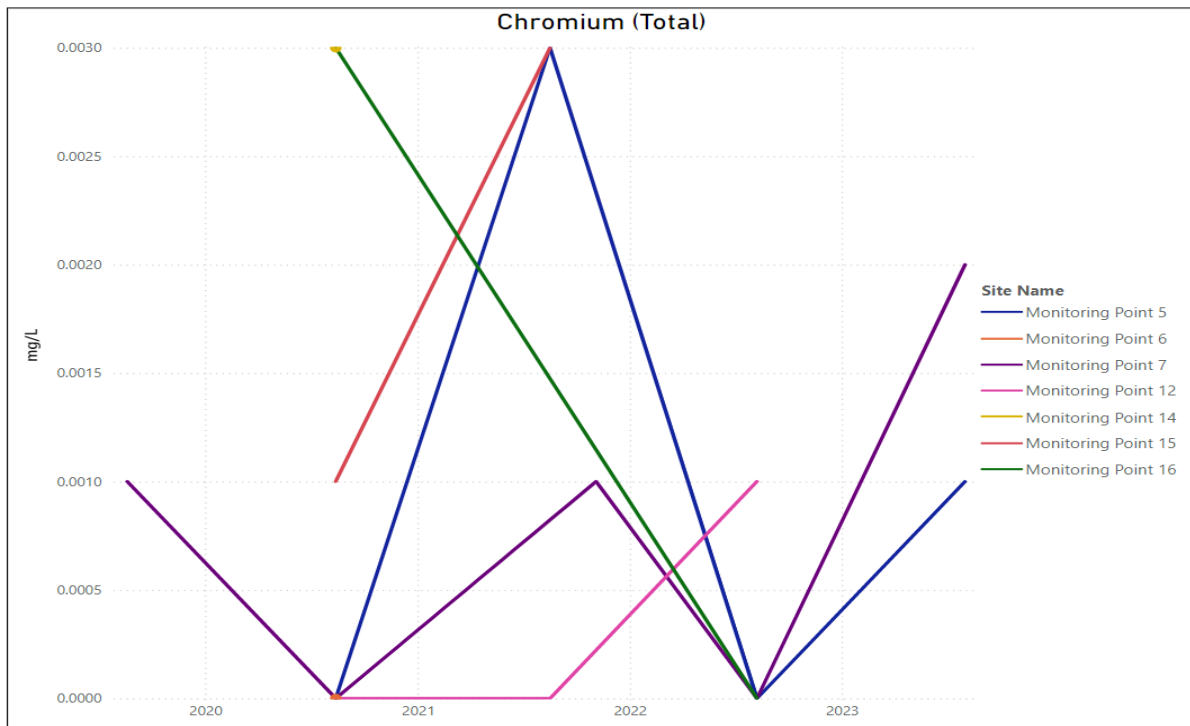


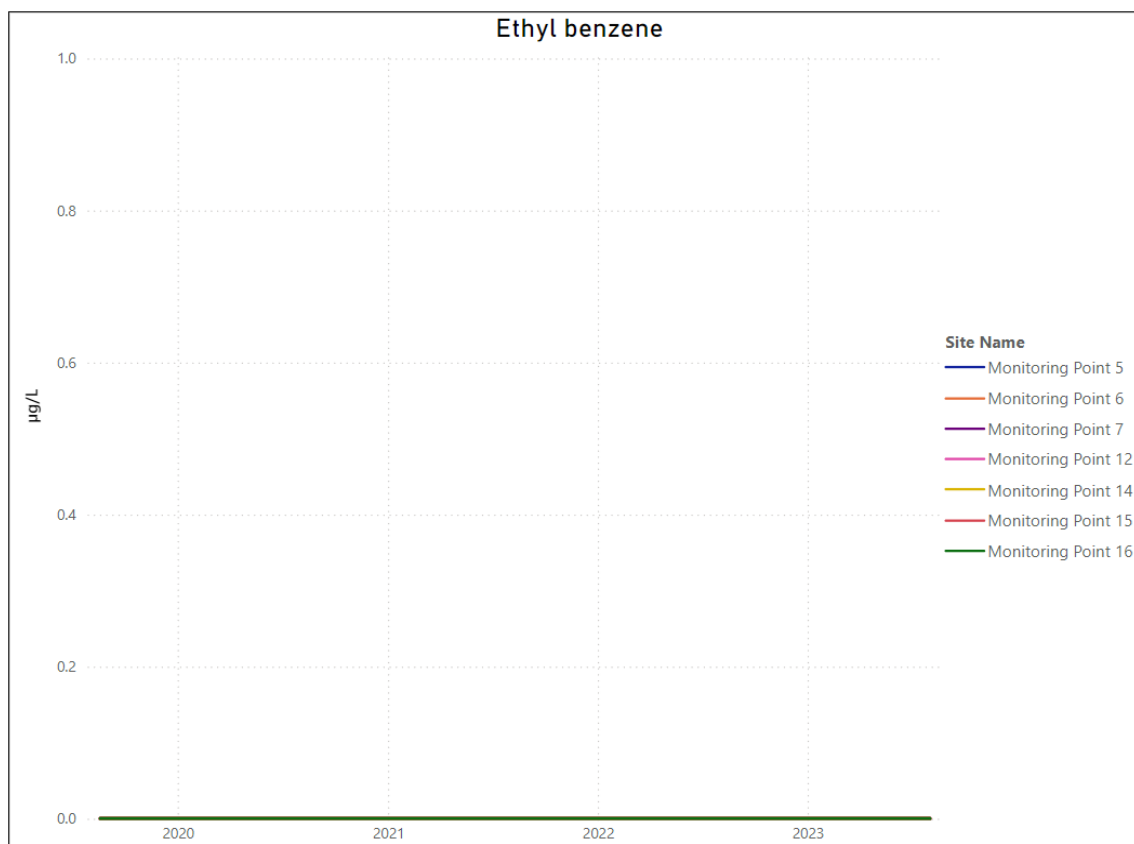
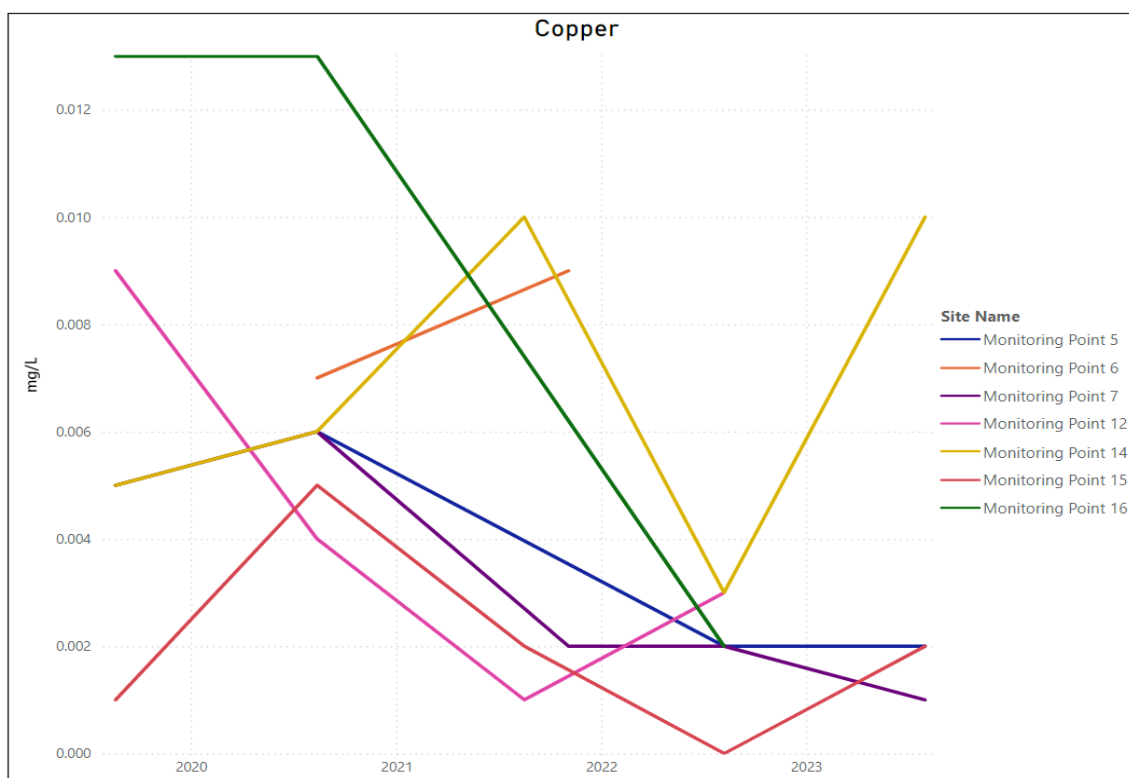
Helensburgh Annual Groundwater Results 2023/24

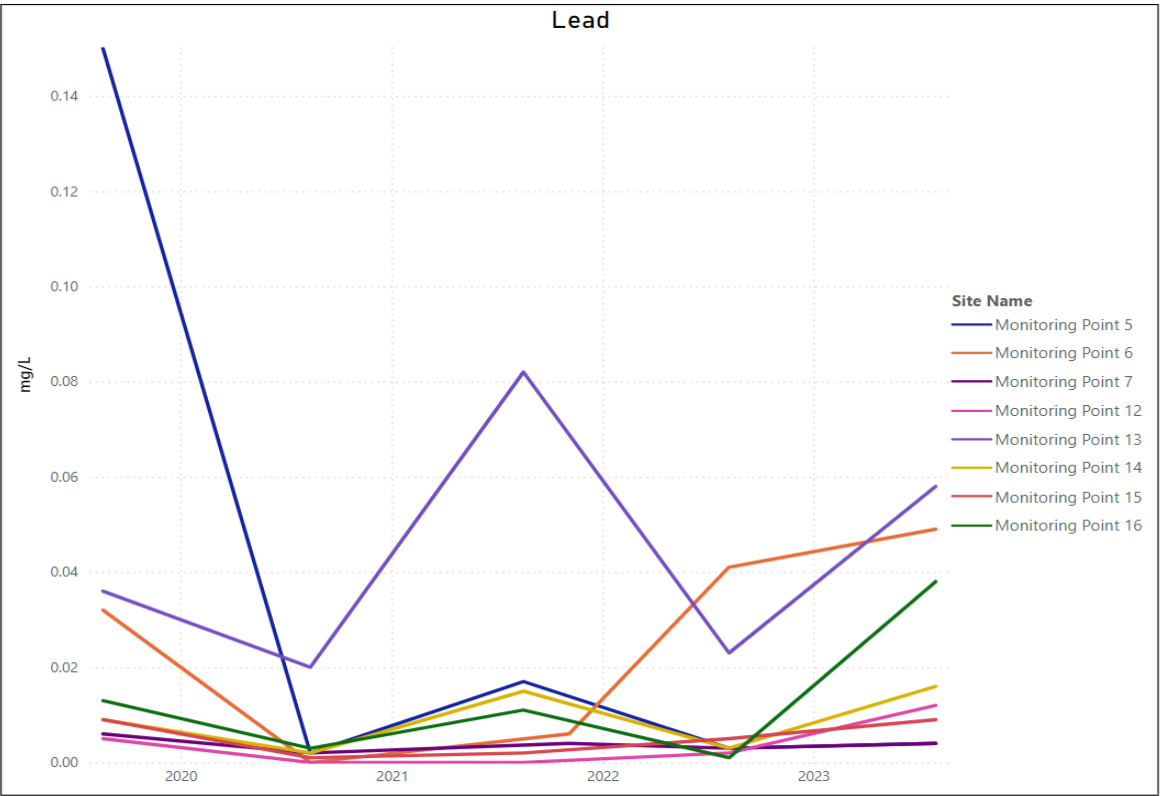
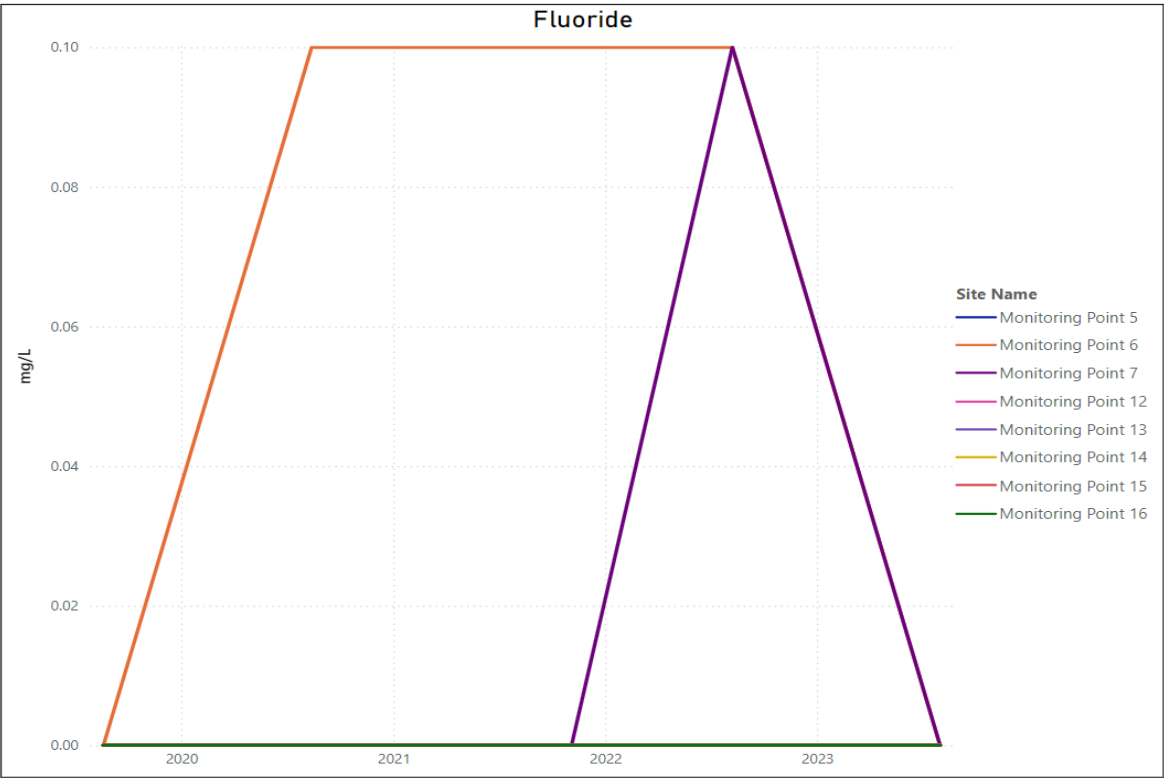


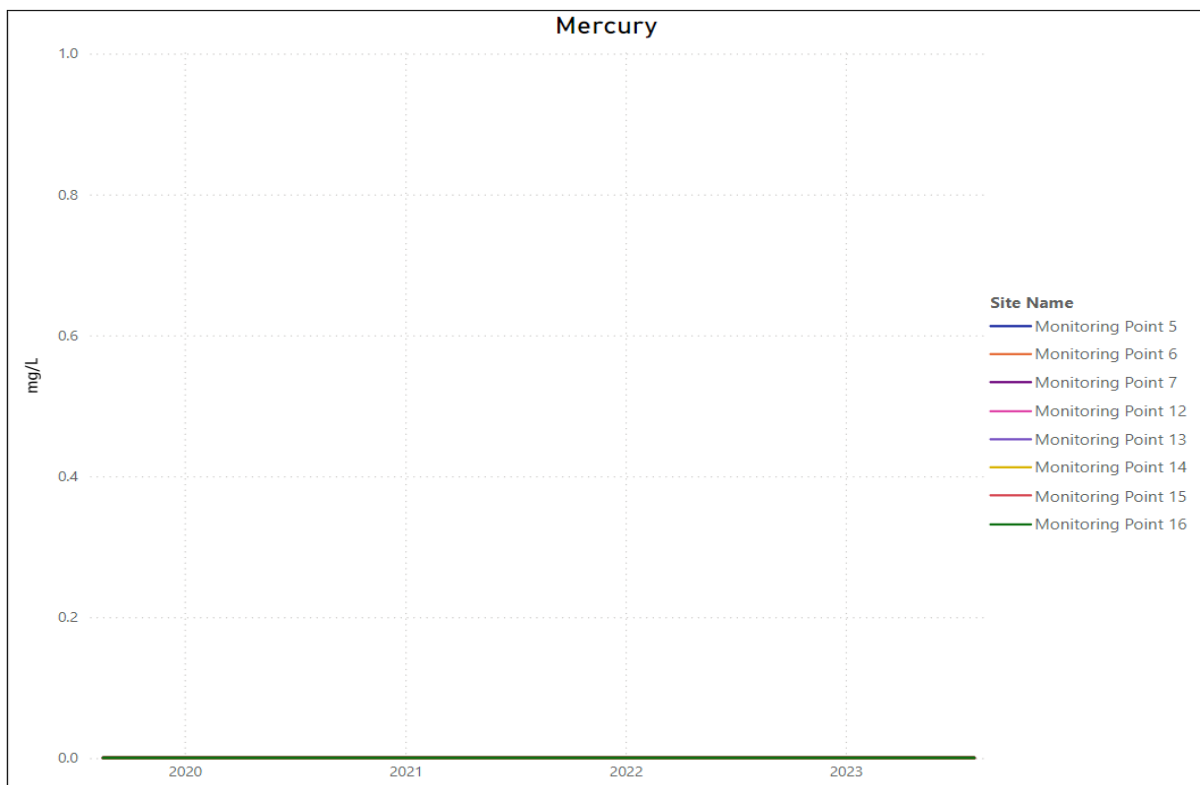
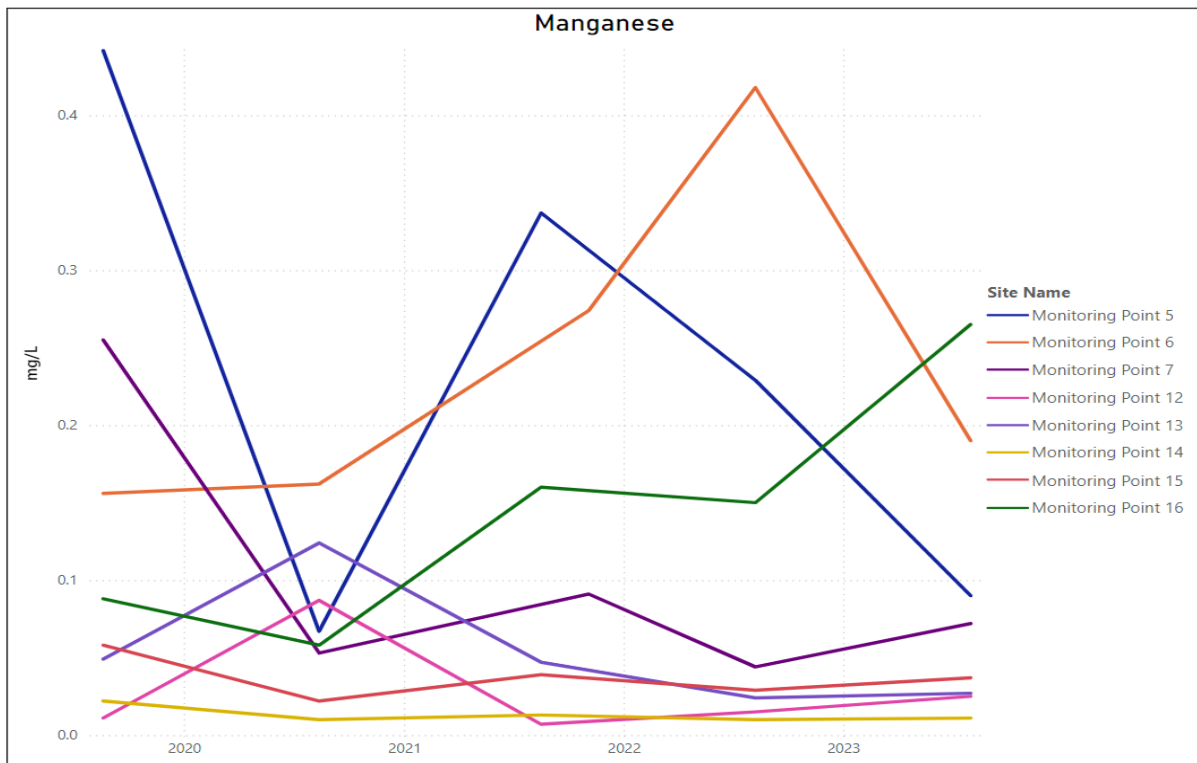




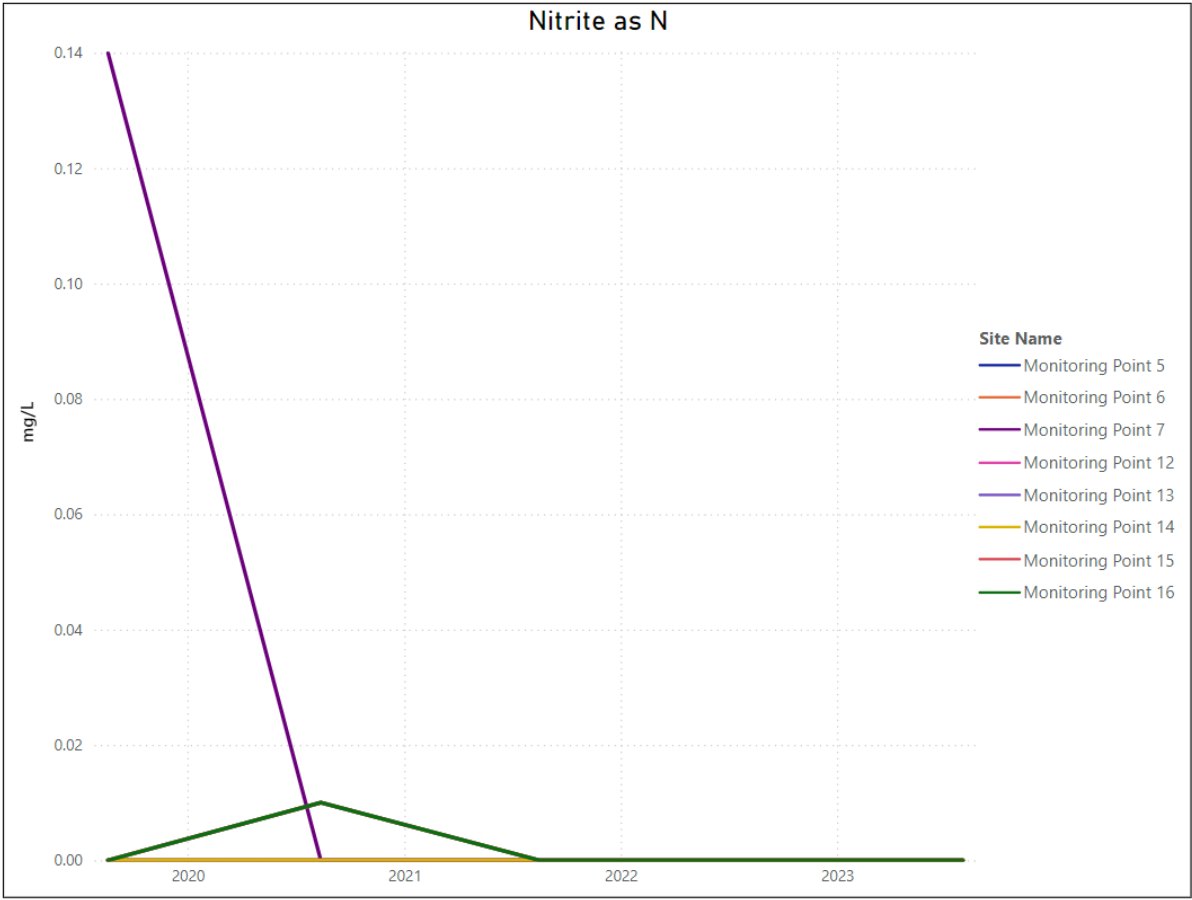
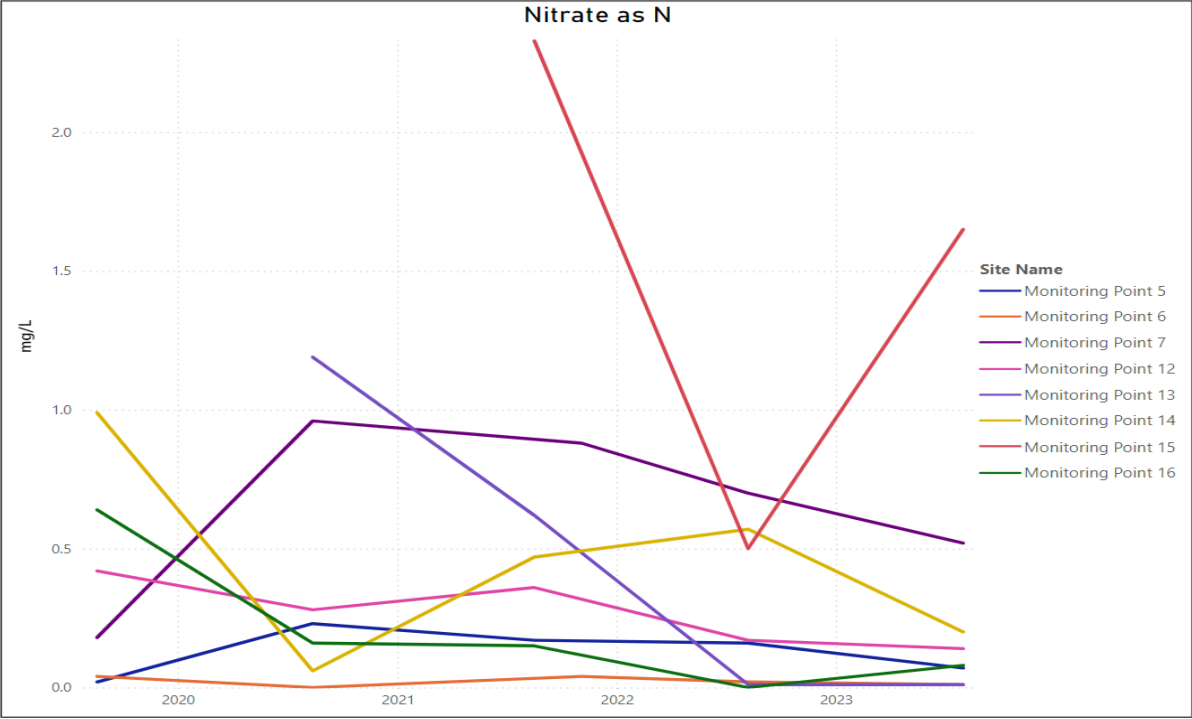


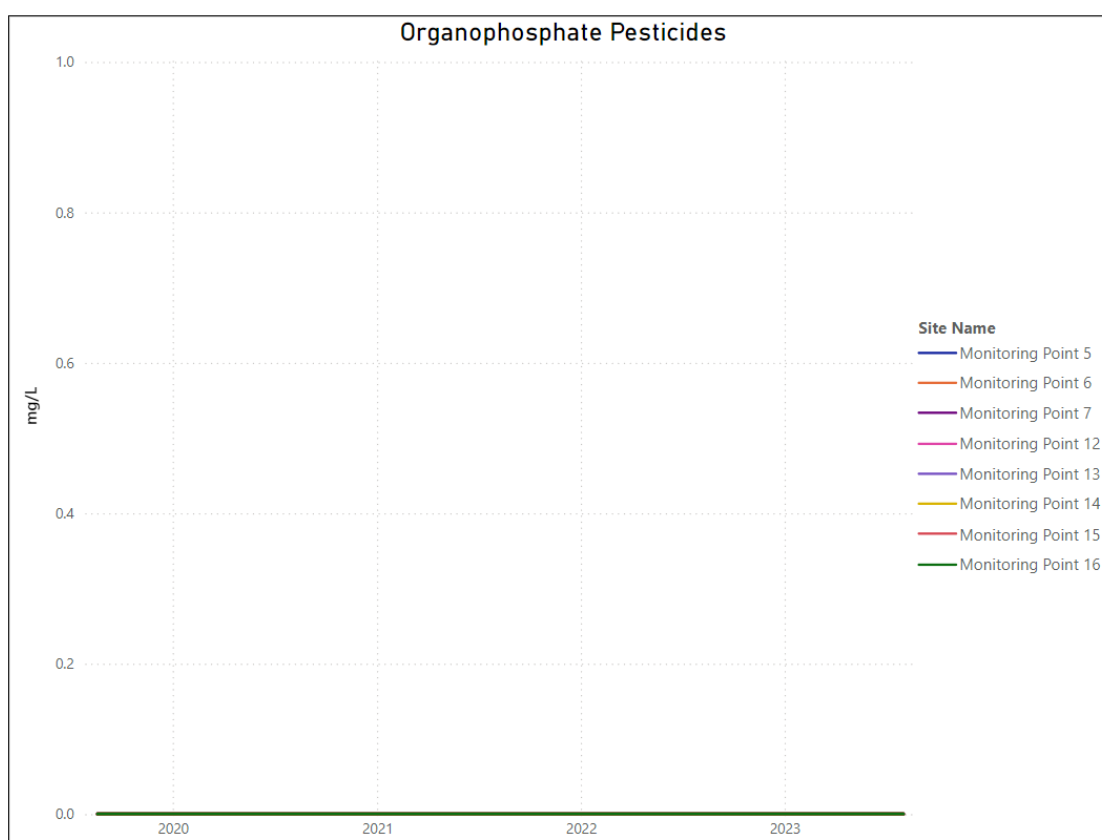
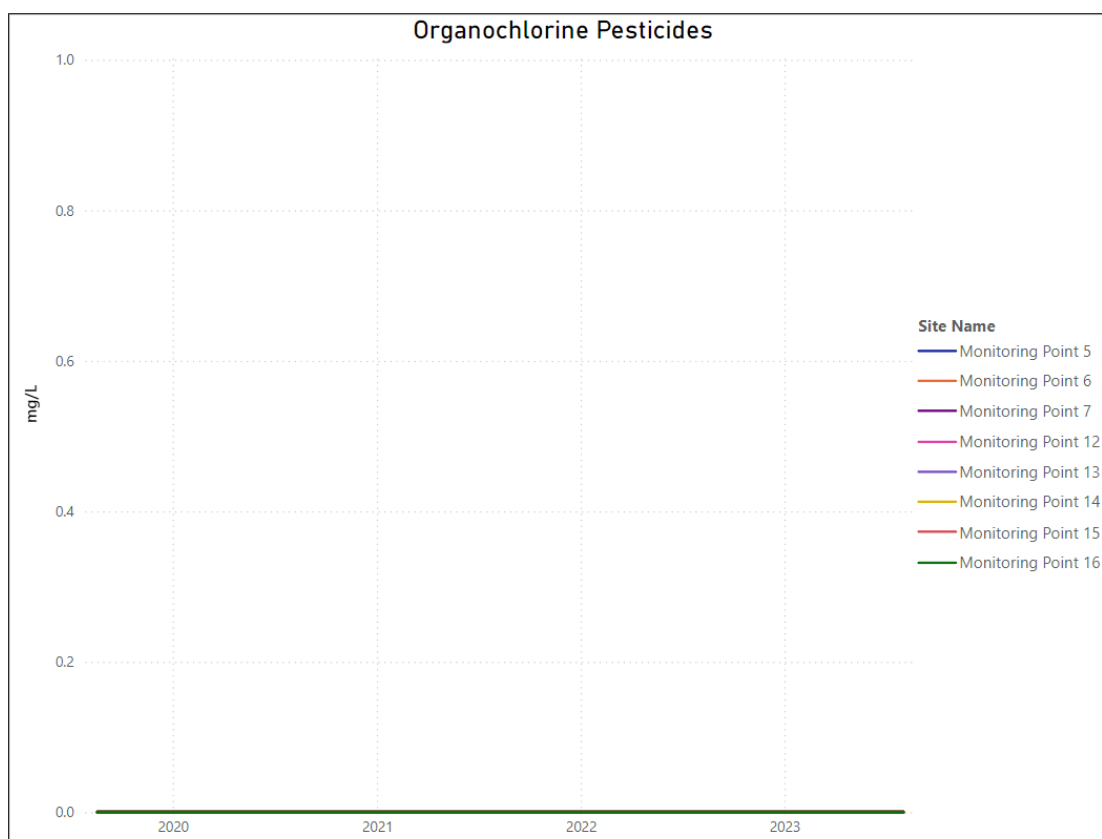


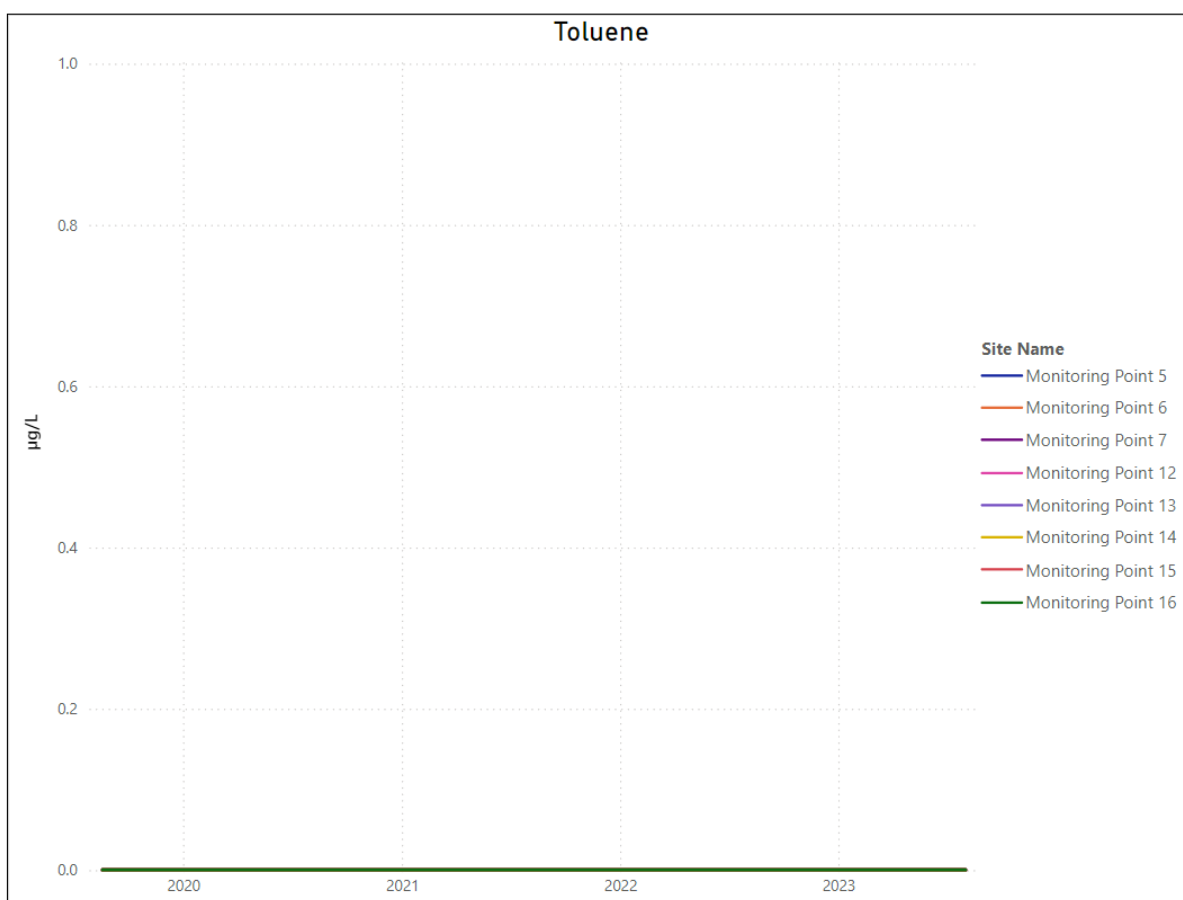
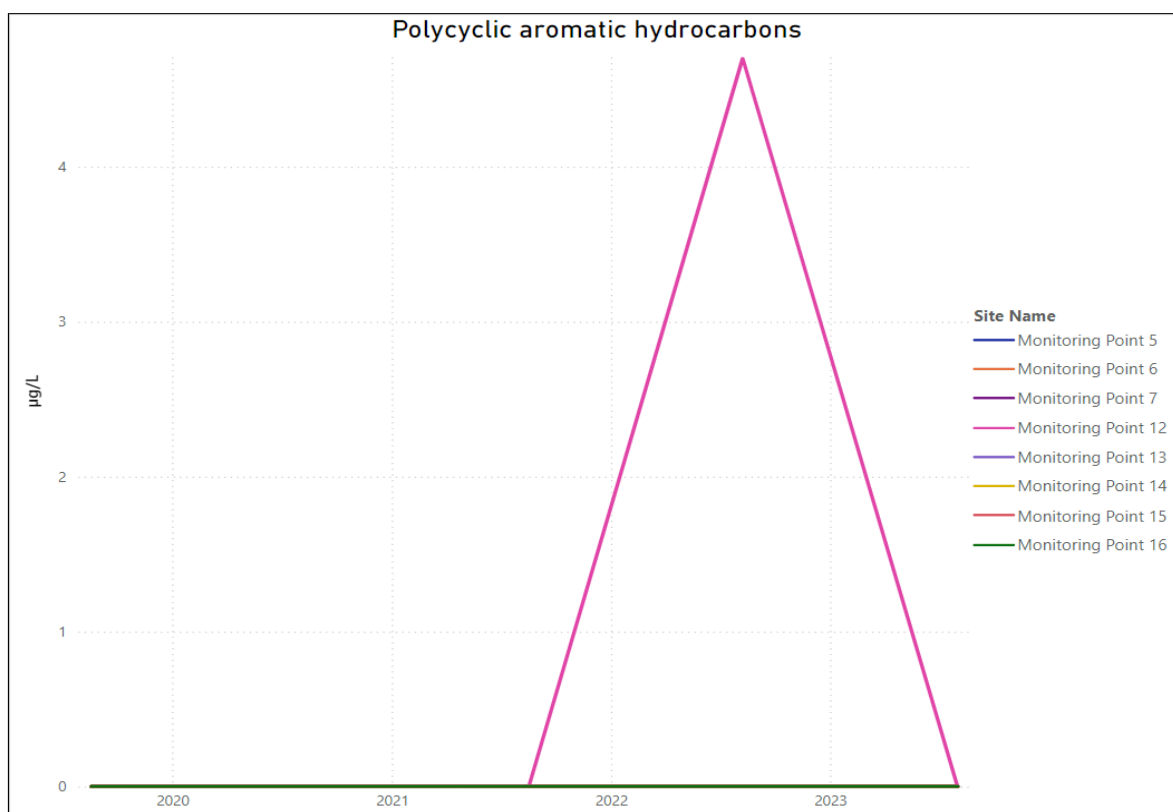


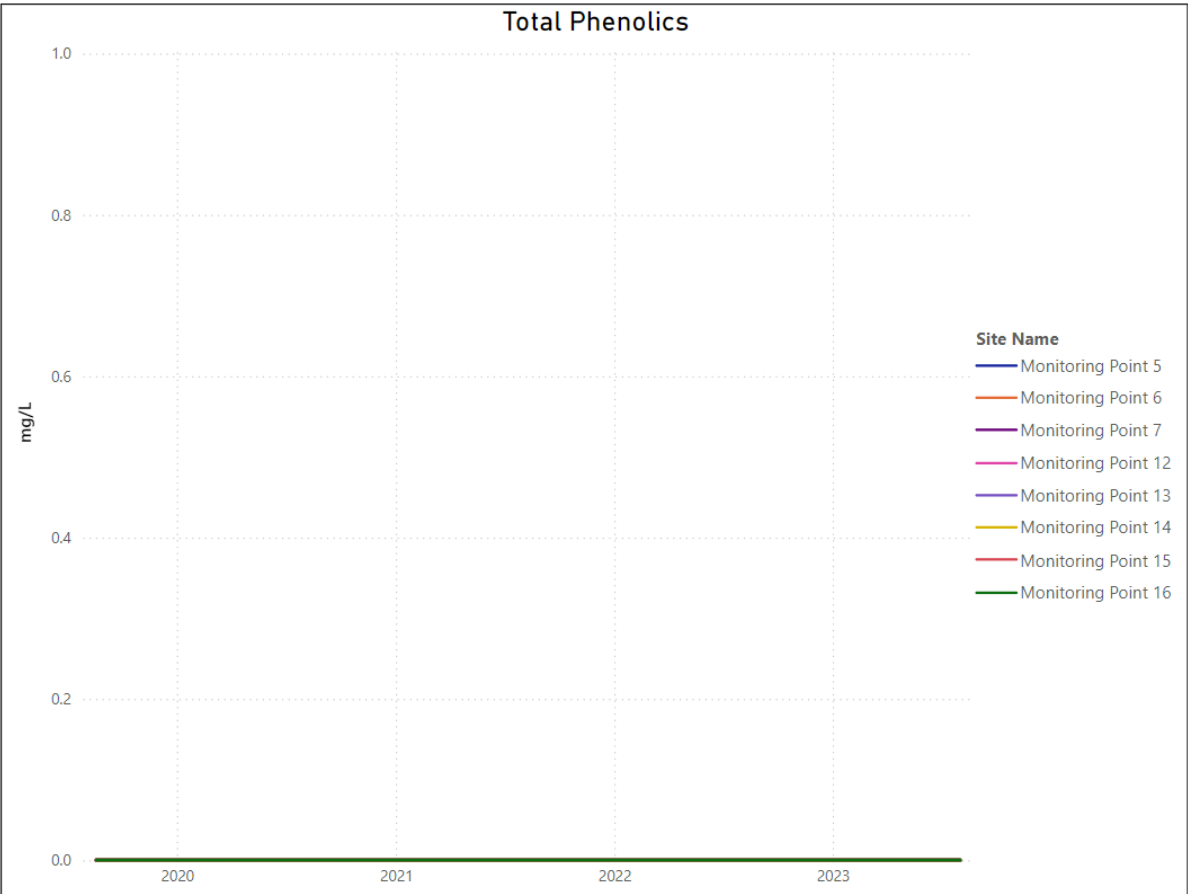
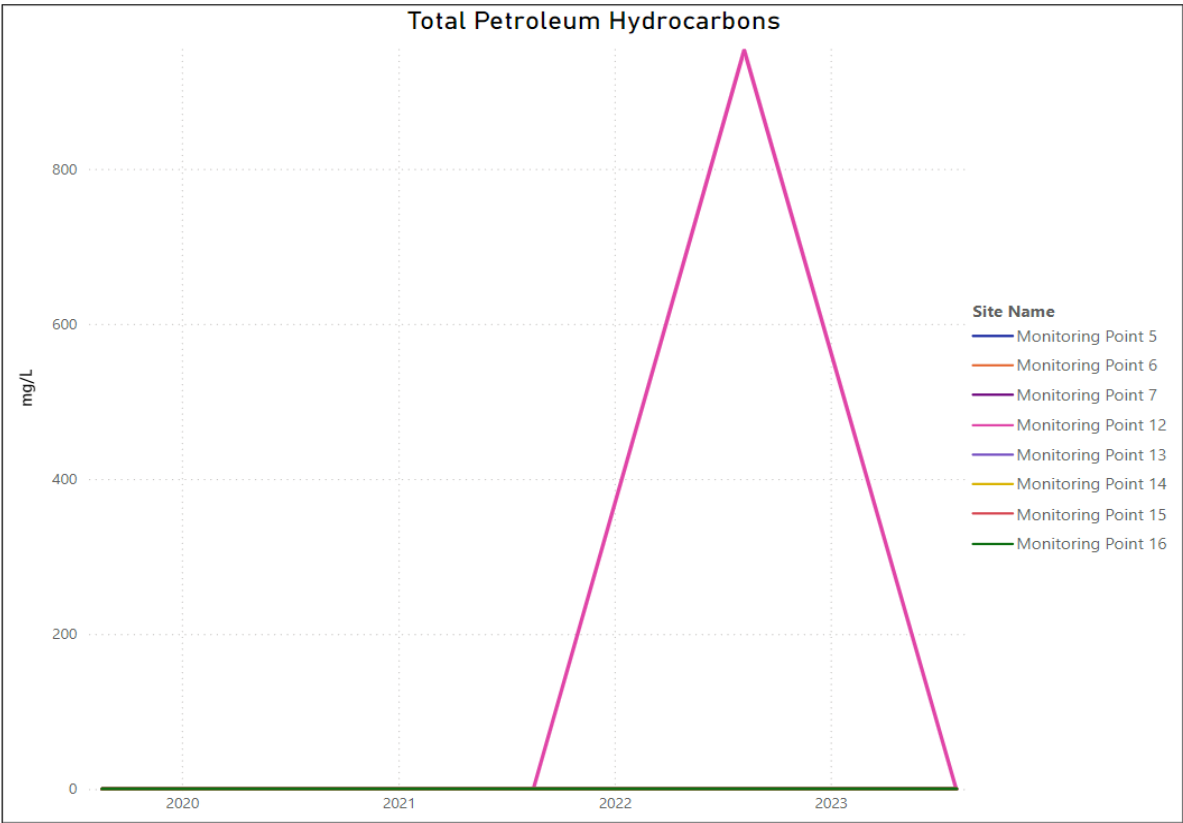


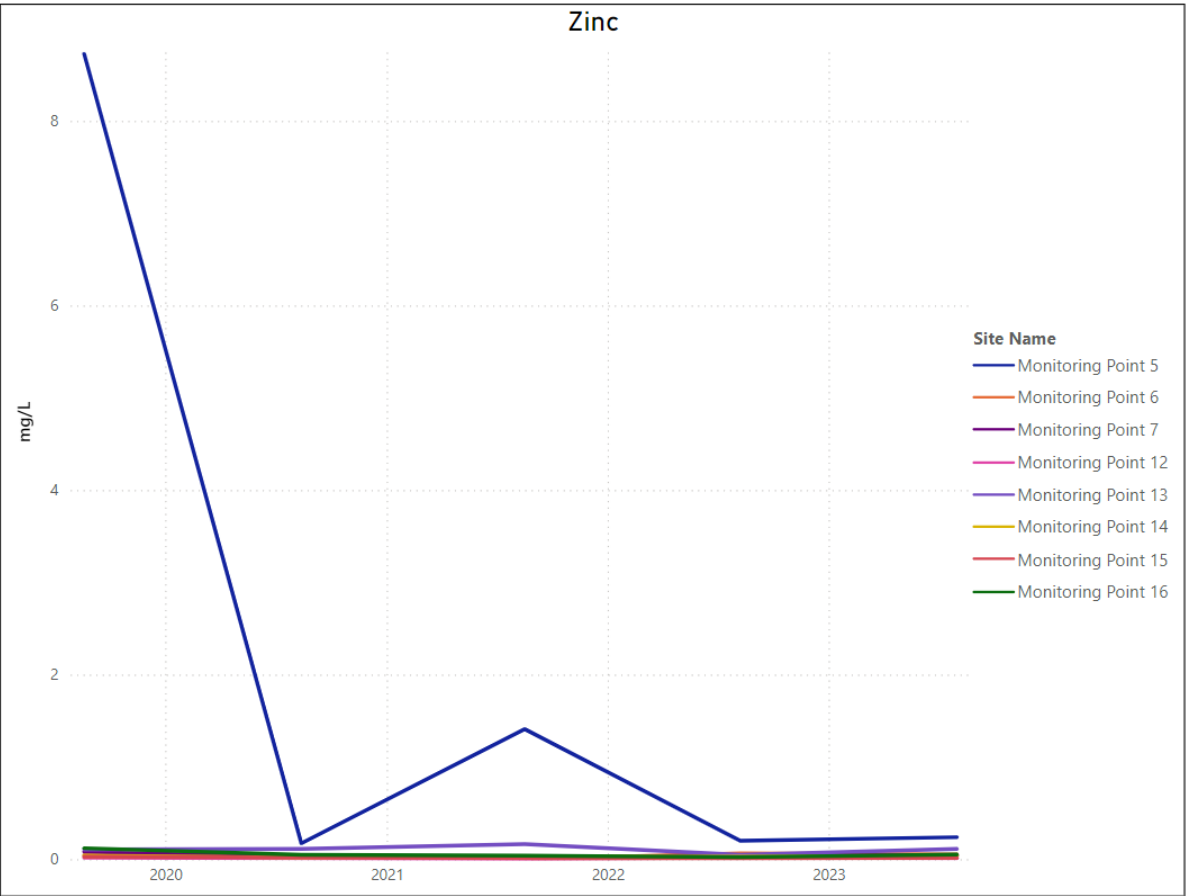
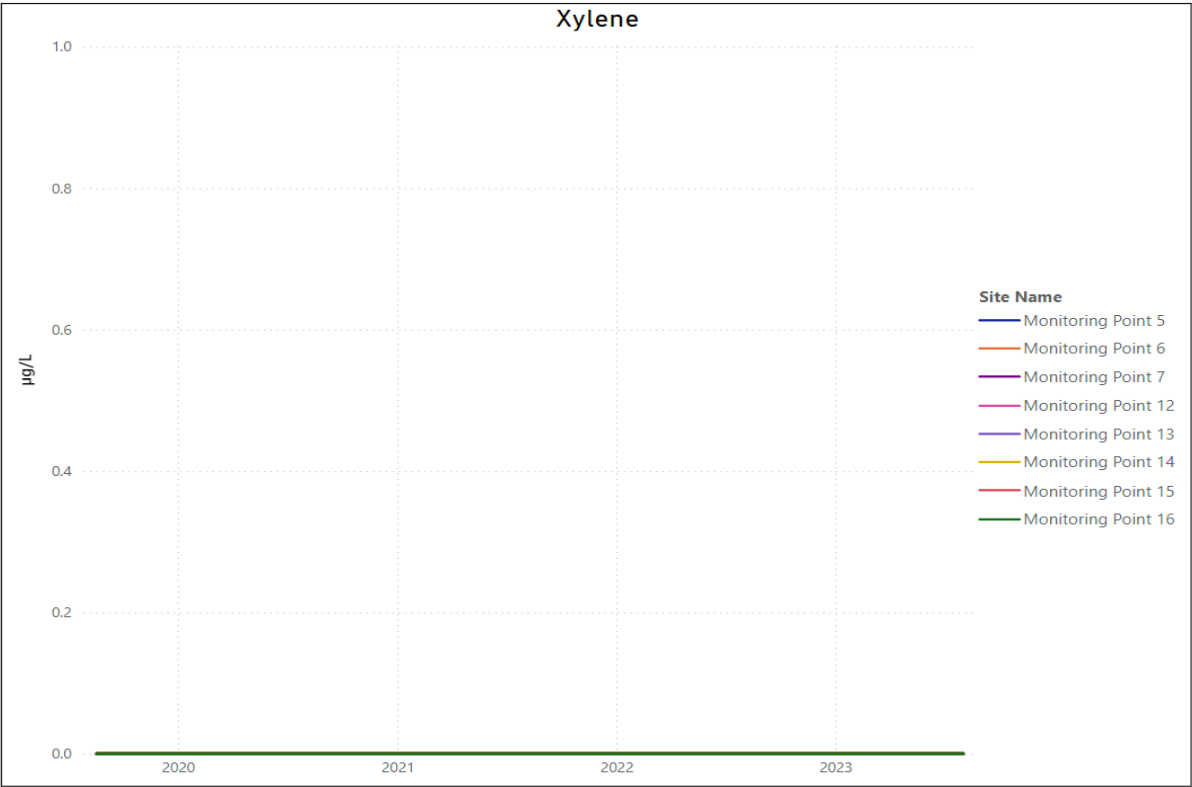












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