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Wyndham Landfill Works Approval Application

Cleanaway Waste Management Pty Ltd ('Cleanaway') operates the Melbourne Regional Landfill located approximately 18.5km to the north-east of the Wyndham Landfill.

Cleanaway has reviewed the works approval application for the extension of the Wyndham Landfill submitted to EPA by Wyndham City Council to assess the nature of the proposed development in the context of broader waste management activities in the western regions of Melbourne.

Cleanaway supports the implementation of best practice management practices at all waste management facilities regulated by the EPA in Victoria and expects that any proposals for the extension of or establishment of new landfills in Victoria are subject to a thorough and robust environmental impacts assessment similar to what has been completed for a recent landfill extension application submitted to EPA for the Melbourne Regional Landfill.

Based on review of the application, Cleanaway would request that the EPA consider the following submission in the assessment of the works approval application:

1. There is a proposal to 'piggy-back' new cells onto existing Cells 1B, 2 and 3. All of these existing cells are not final capped and are covered with 0.35m-1.7m of soil. Construction of the first 'piggy-back' liner will not be completed until 2038. There is no assessment as to the environmental risk of delaying rehabilitation of these cells until the new 'piggy-back' liner is constructed.
2. There is no odour modelling included in the works approval documentation showing the potential extent of future odours impacts based on future cells and leachate ponds proposed as part of the works approval being odour sources.
3. There is no noise modelling included in the works approval showing the potential noise impact of operations in future proposed landfills cells. There is only noise monitoring data provided for the current site operation.
4. The base of futures cells is defined as being 2m above the maximum groundwater level measured since groundwater pumping ceased at the site in 1996. More analysis should be provided showing that the maximum groundwater level is representative of the long-term groundwater level trend for the site and that groundwater data accounts for peak groundwater recharge events based on maximum annual rainfall.
5. There is no LFG modelling for the site showing estimated gas generation volumes and associated calculations. There is no information about the proposed future LFG treatment at the site.
6. There is no assessment of risk associated with future LFG generation in the proposed cells on neighbouring receptors to the landfill.
7. There is in-sufficient detail in the works approval to explain the proposed cell construction design in the context of the quarrying operations at the site.

Cleanaway objects to the EPA issuing a works approval for the extension of the Wyndham Landfill without the comments above being responded to in an adequate and acceptable fashion by the Wyndham City Council so that the potential environmental impacts of the extension of the Wyndham Landfill can be fully assessed.

Regards,



Mark Globan
Regional Manager – Post Collections VIC/TAS
Cleanaway Solid Waste Pty Ltd