

Technical Comment

To: Leonie Grace
Fax No:
From: Simon Bloomberg
Date: Monday 18 February 2019
File Reference: SLUS-00000165
Subject: *Re: Discharge Consent Re-application*



**environment
SOUTHLAND**

Te Taiao Tonga

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Comment:

I have reviewed application 'APP-20191112' with respect to the previous comments made by yourself to Emily Allen in 2018. The site is operating as a mixed cleanfill-greenwaste landfill and fits into category 3 of the WasteMINZ 'Technical guidelines for disposal to land' (updated 2018). Category 3 is a managed fill which may pose a risk to ground or surface waters and is required to have controls for siting, waste acceptance criteria, operations, capping, and monitoring.

The attached WSP-OPUS AEE and landfill review by LAWS outline the probable and known effects of the landfill on the nearby surface waters and groundwaters. Sampling undertaken since 1998 indicates the landfill leachate to surface water has reduced in contaminant levels. Continued monitoring is still recommended however this could be reduced to annually. It is likely that the risk to the surface water and the sensitive receptors is low. The review by LAWS suggests that the nearby groundwater bore could be included in the annual compliance monitoring event in order to understand the contribution of the landfill to groundwaters. Additionally, LAWS find that sediment loss to the receptor is likely to be the key contaminant of concern to shellfish in Braggs Bay.

The Applicant has not drafted any additional consent conditions further to those existing in the current consent. Therefore, to make note of the suggested additions by LAWS, the following draft condition could be discussed with the applicant.

- Update Consent condition 12 (b) to include a sample from the nearby water bore.

***N.B.** SDC should confirm that this bore is still accessible and if so could be located and identified in the consent conditions.*

In section '6. Conditions' of the AEE, WSP-OPUS note that they also would consider additional conditions for peak runoff controls further to those outlined in condition 10 of the existing consent:

'10. (i) steps to reduce contaminated stormwater from the site;'

This condition however already seems appropriate for requiring the consent holder to undertake peak runoff control and now that the issue is known to be related to sediment, the consent holder can undertake such steps as to be compliant with conditions 10. (i).

The landfill management plan provided by SDC shows images of the site and the tip face. The site is well vegetated, and it is likely that runoff containing sediment would only be an issue following each addition of greenwaste and cleanfill cover if – additionally - there were to be heavy rains the following week. The landfill management plan could be updated to mitigate this potential risk to the environment by including forecast checks and return visits to monitor the site during that time where there is a perceived risk to the environment.