

Macquarie Generation

# Project Symphony, Liddell Power Station

Stage 2 Environmental Site Assessment

Ref: 0224198RP02

31 January 2014



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Environmental Resources Management Australia Pty Ltd Quality System

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# EXECUTIVE SUMMARY

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned by Macquarie Generation to undertake a Stage 2 Environmental Site Assessment (Stage 2 ESA) at Liddell Power Station (herein referred to as the "Site") in accordance with the work scope presented in the Preliminary Environmental Site Assessment (Preliminary ESA; ERM Reference 0213879RP02, Draft Rev 02) prepared by ERM.

The primary objective for the Stage 2 ESA was to gather soil and groundwater data in order to develop a baseline assessment of environmental conditions at the Site (including groundwater and land), as at or near the time of the transaction. Data obtained during completion of this Stage 2 ESA may also be used to inform future management of contamination at the Site.

# Investigation Methodology

To achieve the stated objectives, ERM collected soil and groundwater samples and submitted those collected samples to environmental laboratories for analysis of Constituents of Potential Concern (COPCs). A Conceptual Site Model (CSM) developed for the Site during the Preliminary ESA was further refined and the analytical data was compared against published environmental screening levels to assess potential risks to human health and the environment.

The following conclusions were made based on the data collected during the investigation.

#### Investigation Outcomes

The key impacts identified at the Site include asbestos present beneath the ACM pipelines to the Liddell Ash Dam, potential risks associated with inhalation of petroleum hydrocarbon vapour near the light vehicle refuelling area and potential migration of petroleum hydrocarbons from the bulk fuel storage areas towards Lake Liddell. It should be noted that the results of the assessment of sediment and surface water in Lake Liddell is included within ERM (2014) Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment.

#### Site Management and Remediation Requirements

- No contamination issues were identified which would require material management or remediation based on the current and continued use of the Site as a Power Station with the exception of potential material issues associated with the identified asbestos impacts in soils surrounding the ACM pipelines to Liddell Ash Dam and water management issues related to Liddell Ash Dam that are the subject of a Pollution Reduction Program report currently being prepared.
- The preparation and implementation of a suitable Environmental Management Plan (EMP) by an appropriately qualified professional is recommended to mitigate the risk of exposure to asbestos associated with areas in close proximity to the ash dam ACM pipelines and across the site as a whole during excavation works.

• Whilst some further assessment may be required to address the hydrocarbon impacts in the bulk fuel storage areas and in the former and current maintenance stores, workshops, foam generator and unofficial lay-down areas, it is unlikely that costs related to this work would exceed the adopted material threshold for the purposes of this assessment.

# Requirements under the Contaminated Land Management (CLM) Act 1997

With regard to the duty to report contamination under the CLM Act (1997) and the potential for regulation, ERM notes the following:

- ERM understands that Macquarie Generation is in the process of developing a management strategy in relation to the identified asbestos issues in the vicinity of the ACM pipelines. Further, ERM understands that access to these areas has been restricted to mitigate potential risks to human health in the short term and that further delineation and quantification of asbestos in soils in this area is being undertaken. It is recommended that the outcomes of this further assessment are reviewed prior to a decision relating to notification of NSW EPA under Sec. 60 of the CLM Act 1997. It is also noted that Macquarie Generation has notified WorkCover NSW of the broader asbestos pipeline issue (given that it relates predominantly to infrastructure and the soil impacts are secondary). It is therefore considered that they would likely be the key regulator for this issue rather than NSW EPA.
- The reporting to the NSW EPA of the concentrations of benzene, naphthalene and PCE measured in on-site groundwater may be warranted on the basis of exceedences of the notification triggers (based on NHMRC (2011) drinking water screening values) in order to maintain compliance with the CLM Act 1997. It would also be prudent to undertake an additional round of confirmatory groundwater sampling at the relevant locations to confirm the reported concentrations prior to preparing the notification. The concentrations of these contaminants are, however, considered unlikely in ERM's opinion to trigger a requirement for active management or remediation. It is considered most likely that regulation of these issues by NSW EPA would (if necessary) be undertaken under the existing Environment Protection Licence rather than under the CLM Act.
- Various metals were detected at concentrations above the human health (drinking water) and / or ecological screening values which were not attributable to background conditions in groundwater at a number of locations across the Site. In many instances however, these impacts are related to activities which are already regulated and monitored under the Site EPL. The identified impacts are also generally located well within the site boundaries and up gradient of Lake Liddell, the discharge from which is also monitored and regulated under the Site EPL. ERM considers that NSW EPA would most likely continue to manage this issue under the POEO Act via the Site Environment Protection Licence, and hence would not require formal notification of potential contamination under the CLM Act, however this approach should be confirmed with NSW EPA to ensure strict adherence to the NSW DECC (2009) guidelines.

# Additional Baseline Data Recommendations

The data presented in the ESA was generally considered to be of a suitable quality and completeness to provide a baseline of environmental conditions at the Site and immediate surrounding receiving environments. On the basis of the outcomes of this investigation, some limited additional characterisation of the baseline conditions at the Site is considered to be required as follows;

- Delineation of asbestos contamination in the vicinity of the ACM pipelines to the ash dam. Macquarie Generation is aware of the ACM issue at the pipelines and is currently further investigation and risk assessment (refer to Macquarie Generation (2013) Ash & Dust Position Paper (Ref: 06.03.03.38 ENV.03.03.048)). It is recommended that this delineation be carried out in accordance with the methodology outlined in the ASC NEPM (2013) and should include more detailed inspections of these areas and the collection of soil samples for quantitative analysis.
- Further assessment of groundwater impacts from petroleum hydrocarbons in bulk fuel storage areas is recommended to clarify the potential for these contaminants to migrate to Lake Liddell. This could include fate and transport modelling and detailed risk assessment.
- Confirmatory groundwater sampling is recommended at the water intake and pump station to confirm the measured concentrations of benzene with specific reference to clarification of the duty to report contamination under Section 60 of the CLM Act 1997.
- Confirmatory groundwater sampling and ultra-trace laboratory analysis is also recommended at the former and current maintenance stores, workshops, foam generator and unofficial lay-down areas to assess whether vinyl chloride is present due to detection of PCE and other breakdown products.

# 1 INTRODUCTION

# 1.1 BACKGROUND

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned by Macquarie Generation to undertake a Stage 2 Environmental Site Assessment (Stage 2 ESA) at Liddell Power Station. Liddell Power Station, herein referred to as the "Site", is situated on the New England Highway, approximately 10 kilometres (km) to the south-east of the township of Muswellbrook and approximately 25 km to the north-east of the township of Singleton, in New South Wales (NSW), Australia.

The works detailed herein were completed to support the potential sale of the business in accordance with the work scope presented in the ERM (2013) *Preliminary Environmental Site Assessment* (Preliminary ESA; ERM Reference 0213879RP02, Draft Rev 02).

A site location plan is presented as *Figure 1* of *Annex A*. The general Site layout is presented in *Figures 2* and 3 of *Annex A*.

# 1.2 OBJECTIVES

The primary objective for the Stage 2 ESA was to gather soil and groundwater data in order to develop a baseline assessment of environmental conditions at the Site (including groundwater and land), as at or near the time of the transaction. Data obtained during completion of this Stage 2 ESA may also be used to inform future management of contamination at the Site.

# 1.3 MATERIALITY THRESHOLD

For the purposes of this report, a consistent approach regarding the materiality of a contamination issue has been adopted to that utilised in the Preliminary ESA (ERM, 2013b) which was as follows:

- ERM adopted a materiality threshold of AUD 0.5 M (+ GST if applicable) per contamination source.
- Material costs are those costs for that item to meet relevant requirements of NSW EPA under its current land use to remediate or manage the contamination issue. Remediation or management includes additional assessment, environmental monitoring, management, containment or other remediation measures.

In addition, any issue that ERM considers could have the potential to lead to prosecution by the regulatory authorities that could lead to significant business disruption or reputational impact will be considered material.

# 1.4 APPROACH AND SCOPE OF WORK

The investigation approach and scope of works for the Stage 2 ESA comprised the general tasks described in the following sections, in accordance with the work plans set out in the Preliminary ESA (ERM, 2013b). It is noted that this Liddell assessment was undertaken concurrently with a similar assessment at Bayswater Power Station, but the results are reported in two separate reports.

# Preliminaries

- preparation of a site-specific Health and Safety Plan (HASP), Environmental Management Plan (EMP) and overarching Site Management Plan (SMP);
- assessment of whether suitable monitoring wells exist at the Site, and whether they could be sampled as part of this investigation;
- identification of areas and constituents of potential concern additional to those identified during the Preliminary ESA (ERM, 2013b);
- revision and amendment of the *Sampling, Analysis and Quality Plan* presented in the Preliminary ESA (ERM, 2013b), as necessary;
- engagement of subcontractors including underground utility locator, drillers, laboratories and surveyors;
- scheduling of Site works with Macquarie Generation; and
- completion of site-specific inductions and permitting, as required.

# Site Works

- ground-truthing of proposed sampling locations including clearance of underground services as noted below;
- identification of above and below ground services in the vicinity of drilling locations by reviewing publically available Dial Before You Dig (DBYD) plans and site engineering drawings, and engaging a qualified underground service locator.
- intrusive drilling works and environmental sampling, including soil and groundwater sampling, in accordance with the requirements of the *SAQP*. Final investigation locations are presented in *Figures 4.1 to 4.5* of *Annex A*;
- laboratory analysis of select soil and groundwater samples for particular constituents of potential concern (COPC) in accordance with the requirements of the Preliminary ESA (ERM, 2013b) and as outlined in *Section 4.6;*

- completion of a visual inspection of exposed pipework known or suspected to contain asbestos. Where necessary, sampling of underlying surface soils was undertaken; and
- the survey of newly installed monitoring wells by a registered surveyor to Australian Height Datum (AHD) and Map Grid of Australia (MGA).

# Reporting

- Preparation and submission of weekly progress reports to Macquarie Generation;
- Preparation and submission of an interim report with available data; and
- preparation and submission of this Stage 2 ESA report at the completion of works.

# 1.5 **REPORT STRUCTURE**

This Stage 2 ESA report has been prepared in accordance with the NSW Office of Environment and Heritage (2011) *Guidelines for Consultants Reporting on Contaminated Sites*, as follows:

- Section 1 Introduction, background, objectives and scope of works;
- *Section* 2 Site setting including a summary of the Site history and Site conditions;
- Section 3 Data quality objectives (DQOs) for the works conducted;
- *Section 4* Sampling and works methodologies for completing the investigation;
- *Section 5* Results of the Stage 2 ESA works and Site-specific discussions and recommendations; and
- *Section 6* Conclusions.

Other key guidelines utilised during completion of this Stage 2 ESA included, but were not limited to:

- Australian Standard AS 4482.1-2005 (2005) *Guide to the Sampling and Investigation of Potentially Contaminated Soil. Part 1 Non-volatile and Semi-volatile Compounds;*
- Australian Standard AS 4482.2-1999 (1999) *Guide to the Sampling and Investigation of Potentially Contaminated Soil. Part 2 Volatile Substances;*
- Australia and New Zealand Environmental and Conservation Council (ANZECC) and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) *Australia and New Zealand Guidelines for Fresh and Marine Water Quality;* and
- National Environment Protection Council (NEPC) (April 2013) National Environment Protection (Assessment of Site Contamination) Measure 1999, NEPC, Canberra, hereafter referred to as ASC NEPM (2013).

A full list of all references is also appended to this report.

# 1.6 LIMITATIONS

The findings of this report are based on the client-approved sampling plan outlined in the Preliminary ESA (ERM, 2013b) and the scope of work summarised in *Section 1.4* of this report. ERM performed the services in a manner consistent with the normal level of care and expertise exercised by members of the environmental assessment profession. No warranties, express or implied, are made.

Although normal standards of professional practice have been applied, the absence of any identified hazardous or toxic materials on the subject Site should not be interpreted as a guarantee that such materials do not exist on the Site.

This assessment is based on Site inspections conducted by ERM personnel, sampling and analyses described in the report, and information provided by people with knowledge of Site conditions.

All conclusions and recommendations made in the report are the professional opinions of the ERM personnel involved with the project and, while normal checking of the accuracy of data has been conducted, ERM assumes no responsibility or liability for errors in data obtained from regulatory agencies or any other external sources (with the exception of accredited laboratories engaged by ERM to undertake analysis as part of these works), nor from occurrences outside the scope of this project.

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#### 2 SITE SETTING

Macquarie Generation owns and operates two large conventional coal-fired Power Stations in the Hunter Valley region of New South Wales. Liddell Power Station and Bayswater Power Station are located within 3 km of each other on either side of the New England Highway, approximately 10 km to the south-east of the township of Muswellbrook and approximately 25 km north-west of the township of Singleton. The two Power Stations share some infrastructure such as coal and water supply.

# 2.1 SITE IDENTIFICATION

Liddell Power Station is located approximately 1 km east of the New England Highway on the shore of Lake Liddell. The approximate coordinates of Liddell Power Station are 309693 m E and 6416597 m S. A site location plan is provided as *Figure 1* of *Annex A*.

The Site is composed of the following key features:

- Liddell Power Station's main power block including electricity generating units, auxiliary fuel storage, water treatment plant and associated infrastructure, workshops and stores;
- Liddell Ash Dam, located approximately 4 km (pipe run length) to the west across the New England Highway, and associated pipelines for carrying ash slurry and return water;
- coal storage area and conveyors transporting coal from the Antiene Rail Coal Unloader (RCU), Ravensworth RCU, Bayswater Power Station and nearby mines;
- a switchyard (33 kV), adjacent and to the west of the main power block. This switchyard is owned and operated by TransGrid, a State owned corporation. Whilst conditions around the boundary of this area were assessed as part of this Stage 2 ESA, assessment of conditions within the switchyard boundary was not part of the scope of works;
- Hunter Valley Gas Turbine (HVGT), located approximately two km south of the main power block; and
- buffer lands surrounding the infrastructure described above.

For the purposes of this assessment and based on the proposed separation of assets between Bayswater and Liddell Power Stations set out in *Proposed Liddell & Bayswater B Subdivision* (Chelace GIS, 2013), infrastructure shared by Bayswater and Liddell Power Stations has been allocated as follows:

- the land associated with the water transfer lines and coal transfer lines between the Power Stations have been separated by assessing the portions located within the boundaries of the respective sites as indicated on *Figure* 3 of *Annex A*;
- the Antiene RCU and Ravensworth RCU have been assessed as part of Bayswater Power Station; and
- Lake Liddell has been assessed as part of Bayswater Power Station and reported in *Project Symphony Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

The total area of the Site is approximately 1500 hectares (ha). The Power Station operational area itself occupies approximately 700 ha and includes coal stockpiles and conveyors, electricity generation units (coal hoppers, bowl mills, feed systems, coal fired boilers, steam turbines, hydrogen cooled generators and transformers), air emission controls (fabric filters and chimney stack), bulk fuel storage and transfer infrastructure, cooling water processes (intakes, pre-treatment facilities, cooling towers and returns), wastewater holding ponds and treatment facilities, maintenance facilities and administration offices. A plan showing the layout of the operational area is provided as *Figure 2* of *Annex A*.

For the purpose of this assessment, the Site has been divided into 22 individual areas of environmental concern (AECs), according to usage and the presence of potential sources of contamination. These areas, listed in *Table 2.1*, are discussed in detail in the Preliminary ESA (ERM, 2013b).

Table 2.1	Summary of Areas of Environmental Con	ncern
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Identification	Work Area Description	Figure Reference
LA	Ammonia plant	Figure 4.3
LB	Ash Dam	Figure 4.2 and 4.3
LC	Bulk fuel storage – Light-vehicle refuelling area	Figure 4.3
LD	Bulk fuel storage - Mobile refuelling facility	Figure 4.4
LE	Bulk fuel storage - Fuel oil installation ASTs (A-F)	Figure 4.3
LF	Bulk fuel storage – Waste oil AST (Transformer Road) and former transformer oil ASTs	Figure 4.3
LG	Bulk fuel storage - Turbine oil AST	Figure 4.3
LH	Bulk fuel storage – Waste oil ASTs (liquid alternative fuels) and emergency generator AST	Figure 4.3

Identification	Work Area Description	Figure Reference
LI	Current and former coal storage area	Figure 4.4
LJ	Dangerous goods, flammable liquids and stores	Figure 4.3
LK	Former construction workshop and storage	Figure 4.3
LL	Hunter Valley gas turbines	Figure 4.5
LM	Machinery graveyard	Figure 4.3
LN	Oil and grit trap	Figure 4.3
LO	Former and current maintenance stores, workshops, foam generator and unofficial lay-down areas	Figure 4.3
LP	Fill material (Site levelling and Shoreline expansion)	Figure 4.3 and 4.4
LQ	Transformer operations/ transformer road	Figure 4.3
LR	TransGrid switchyard	Figure 4.3
LS	Landfills (waste disposal and borrow pit)	Figure 4.4
LT	Water intake and pump station	Figure 4.3
LU	Water treatment plant	Figure 4.3
LV	Buffer land	Figure 4.1, 4.2 and 4.4

# 2.2 SITE HISTORY

Construction of Liddell Power Station commenced in the late 1960s. The Power Station was commissioned in 1971. The first generator unit at the Site was completed in 1971, two more were completed in 1972 and a fourth and final generator unit was completed in 1973. The Power Station was constructed as a base load facility and for many years was the backbone of the NSW electricity system.

Liddell Power Station's proposed end of life is December 2022, however a Macquarie Generation engineering review concluded that an operational life to 2032 is feasible (*Liddell Asset Management Strategy*, 2010).

Further information regarding the history of the Site, including historical aerial photographs, zoning and environmental approvals, licenses and management is presented in the Preliminary ESA (ERM, 2013b).

# 2.3 SURROUNDING ENVIRONMENT

The Site is surrounded by areas used mainly for mining purposes with some grazing, bushland, viticulture and thoroughbred horse stud farms in the region.

Key industrial uses in the area include:

- Macquarie Generation's Bayswater Power Station (operational area) located approximately three km to the south-west of the Liddell Power Station; and
- existing and former coal mines in the area, including Drayton Coal Mine adjacent to the Liddell Ash Dam west of the Site, Liddell Colliery approximately 2 km south east of the Liddell Power Station operational area and the Ravensworth Rehabilitation Area approximately 7 km to the south of the Liddell Power Station operational area.

The closest residential areas to the Site include:

- Muswellbrook, approximately 10 km to the north-west;
- Jerrys Plains Village, approximately 15 km to the south-west;
- Singleton, approximately 25 km to the south-east; and
- rural residences that do not form part of residential centres.

# 2.4 TOPOGRAPHY

The Site lies within a broad river valley created by the Hunter River and its tributaries. Whilst the general slope in the area is towards the Hunter River in the south, the topography is characterized by undulating hills that leads to high variability in slope direction across the Site.

The operational area of the Liddell Power Station gently slopes to the east. The main power block is cut into the slope of the hill exposing natural bedrock (a conglomeratic sandstone). The TransGrid switchyard, to the west of the main power block and at the higher end of the slope, lies at an elevation of approximately 167 m AHD. From here, the ground surface drops down to the main power block which lies at an elevation of approximately 145 m AHD and declines to approximately 133 m AHD at the edge of Lake Liddell. There is evidence to suggest the site level at the boundary with Lake Liddell has been raised over time through in-filling.

# 2.5 GEOLOGY

# Regional Geology

The Site is located on the northern section of the Sydney Geological Basin and the *1:100 000 Hunter Coalfield geological map* (Department of Mineral Resources 1993) indicates that the Liddell Power Station is underlain by Permian age conglomerate, sandstone, siltstone and claystone of the marine derived Maitland Group.

The 1:100 000 Hunter Coalfield geological map further indicates that Quaternary age alluvial sediments (consisting of silt, sand and gravel) are associated with the Bayswater Creek, Foy Creek and the Hunter River.

The *Muswellbrook* 1:25 000 *Geological Sheet* 9033-*II-N* (NSW Department of Mineral Resources) indicates that the Liddell Power Station and the areas adjacent to Lake Liddell to the north to be underlain by Permian Age, Maitland Group, Mulbring siltstone consisting of dark-grey shale and siltstone.

The Jerry Plains 1:25 000 Geological Map, 9033-II-S (Sniffin & Summerhayes, 1987) indicates that the geology in the area to the south of Lake Liddell consists of Permian Age, Singleton Super Group, Wittingham Coal Measures, Saltwater Creek formation, comprising sandstone and siltstone with thin lenticular coaly bands and marine siltstone intercalated towards base.

# Local Geology

Limited information regarding the local geology was available for review. Borelogs presented in the DLA Environmental report, *UPSS Groundwater Monitoring Well Report* (2011), indicated that the light vehicle refuelling area (AEC LC), located to the east of the main power block, and is underlain by gravelly sands to depths of 2.5 – 5.2 m below ground level (bgl). Beneath this was sandstone bedrock proven to a maximum depth of 7.5 m bgl. Borelogs presented in this report pertaining to the mobile plant refuelling area (AEC LD), located to the south-west of the main power block, indicated that this area is underlain by clays to a maximum proved depth of 10 m bgl.

Local geological information recorded as part of this Stage 2 ESA are presented as borelogs in *Annex D* and summarised in *Section 5.1*.

Soil

The *Atlas of Australian Soils* (Northcote et al., 1960-68) categorises soil in the area as sodosol. Typical characteristics of these soils are high sodium contents, abrupt increases in clay content at depth, prone to crusting, unstable soil structure prone to erosion, with seasonally perched water tables.

# 2.6 HYDROGEOLOGY

# Regional Hydrogeology

From a hydrogeological perspective, the sedimentary deposits can be categorised into the following units:

• low permeability conglomerate, sandstone, siltstone and mudstone that comprise the majority of the Permian sediments.

- low to moderately permeable coal seams, typically ranging in thickness from 2.5 m to 10 m, which are the prime water bearing strata within the Permian sequence.
- medium to highly permeable Quaternary alluvial sediments associated with the nearby Bayswater Creek, Foy Creek and the Hunter River.

Regional groundwater flow is expected to be towards the Hunter River located to the south of the site.

# Local Hydrogeology

Due to the undulating nature of the topography, variation in localised groundwater flow directions are probable and groundwater flow is expected to follow topography in part with perched infiltrated water expected in some areas. Inferring localised groundwater flow from topography suggests a easterly to north easterly groundwater flow component at the Liddell Power Station towards Lake Liddell.

Limited information regarding the local hydrogeology was available for review. Borelogs presented in the *UPSS Groundwater Monitoring Well Report* (DLA Environmental, 2011), indicated that during drilling in the mobile plant refuelling area (AEC LD), soil became saturated at depths of between 8 and 9.5 m bgl. The report provided no further information about depth to groundwater.

Details of hydrogeological conditions encountered during this Stage 2 ESA are summarised in *Section 5.2* and presented in *Table 2* of *Annex B*.

# 2.7 GROUNDWATER QUALITY AND USE

The search for publically listed boreholes on the NSW Natural Resource Atlas (NRAtlas) presented in the Preliminary ESA (ERM, 2013b) identified eight groundwater bores located within a 5 km radius of the Site. These bores, listed in *Table 2.2* below, are registered for monitoring, testing and industrial uses.

Bore ID	Distance from Site (km)	Direction from Site	Water Bearing Zones (m bgl)	Registered Use
GW201061	0.9	South-east	12-15.1	Monitoring bore
GW047486	4.8	North- west	15-25	Industrial
			28-40	
			43-70	

# Table 2.2Registered Groundwater Bores in Proximity to the Site

Bore ID	Distance from Site (km)	Direction from Site	Water Bearing Zones (m bgl)	Registered Use	
			75-92		
GW080212	0.9	East	Not recorded	Monitoring bore	
GW024022	1.2	West	3	Industrial	
GW200743	4	West	Not recorded	Test bore	
GW200746	4	West	Not recorded	Test bore	
GW201062	0.8	South	14.5-17.4	Monitoring bore	
GW053862	4.5	West	15-17	Industrial	
			26-29		
			66-69		
			80-81		
			26-29		
			96-97		
Note: Multiple water bearing zones encountered in GW047486 and GW053862.					

According to the Coffey International Ltd (Coffey) *Development Application for the proposed Extension to Ash Dam* (2011), regional groundwater in the area is considered to be of poor quality due to the relatively high salinity (approximately  $3500 \ \mu g/L$ ).

# 2.8 HYDROLOGY

The major hydrological feature in the Hunter Valley is the Hunter River, which passes through Muswellbrook, and runs approximately 11.5 km to the south of the Site.

In addition, several local waterways pass through Macquarie Generation lands:

- Maidswater Creek and an un-named fourth order stream (formally a tributary of Saltwater Creek, and currently known as Wykes Gully for internal monitoring purposes) flow into the Antiene Arm of Lake Liddell (a northern bay of Lake Liddell).
- Bayswater Creek and associated tributaries flow into Liddell Ash Dam and then into the western arm of Lake Liddell. Bayswater Creek then flows south from Lake Liddell to the Hunter River.
- an unnamed creek from the Ash Dam spillway (sometimes referred to as Skimmer Pond Creek);
- Tinkers Creek, which runs along the western boundary of the Bayswater Power Station and flows into Lake Liddell;

- tributaries of Tinkers Creek flow eastwards from Freshwater Dam (to the south-west of the main power block) into Lake Liddell to the west of Liddell Power Station.
- Chilcott Gully drains land to the north-east of Bayswater Power Station and flows into Lake Liddell in the south-west; and
- Pikes Creek drains the Pikes Gully (Bayswater) Ash Dam then flows to the north-east to Bayswater Creek, downstream of Lake Liddell.

# 2.8.1 Lake Liddell

It is noted that Lake Liddell is assessed as part of Bayswater Power Station and reported in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014), but discussion is provided herein due to the proximity of the Site to Lake Liddell.

Lake Liddell was constructed as water storage for the Power Stations and is located adjacent to the Liddell Power Station (to the east, north and south). The lake has a surface area of around 1 100 hectares ha and is up to 32 m deep (*Lake Liddell Hydrodynamic Modelling*, Worley Parsons, 2009).

The Lake supplies cooling water to Liddell Power Station and make-up water for the Bayswater Cooling Water Makeup Dam. It also accepts a range of treated discharges as discussed in the Preliminary ESA (ERM, 2013b).

The Lake is constructed in a natural valley at the confluence of Bayswater, Tinkers and Maidswater Creeks (Macquarie Generation, undated). The lake is dammed on the eastern side and is equipped with a spillway leading to a large holding pond.

Water is periodically discharged from Lake Liddell to manage salinity and level. The discharge point is at the dam wall, and discharges flow via Bayswater Creek to the Hunter River, approximately 13 km downstream.

Discharges are under the Hunter River Salinity Trading Scheme (regulated under Bayswater's Environment Protection Licence (EPL) 779) and are made at times of high river flows and low background salinity levels.

Lake Liddell is also used by the public for recreation. The Lake Liddell recreation area is situated on a northern reach of the lake off Hebden Road. It caters for day visitors and campers, and the area is used for water-skiing, sailing, swimming and fishing (NSW Government Visit NSW website 21 June 2013). The area is managed by the Lake Liddell Recreation Area Reserve Trust appointed by the NSW Government to manage Crown Land (NSW Government LPMA website 21 June 2013).

Lake Liddell is surrounded by buffer land to the north. The eastern side is bordered by an open cut coal mine (Liddell Colliery). The west and south are occupied by Liddell Power Station and Bayswater Power Station, respectively.

#### 2.9 SENSITIVE RECEPTORS

The following sensitive receptors relevant to the Site were identified as part of the Preliminary ESA (ERM, 2013b):

- indoor and outdoor human health receptors in the form of industrial onsite and off-site users;
- intrusive maintenance workers both on and off-site;
- residential receptors and potential groundwater users in the vicinity of the site;
- recreational users of Lake Liddell;
- ecological receptors, including freshwater ecological receptors in the local creeks and Lake Liddell.

# 2.10 POTENTIAL AND KNOWN SOURCES OF CONTAMINATION

The following potential and known sources of contamination were identified as part of the Preliminary ESA (ERM, 2013b):

- Hunter Valley Gas Turbines (diesel leaks);
- bulk fuel storage and transfer (potential and historical leaks);
- power generating units (potential and historical leaks);
- Transformer Road (numerous transformer units with oils);
- the ammonia plant (potential and historical leaks);
- oil and grit traps (accumulation of variety of contaminants from potential failure of system or leaks from holding tanks);
- the Site drainage network (direct discharge to Lake Liddell and seepage to soil/groundwater through damaged pipework);
- dangerous goods, flammable liquids and northern store compounds (seepage to ground or discharge to drains);

- asbestos (diffuse source due to large amount of asbestos material known to have been historically used on site);
- the water treatment/demineralisation plant (direct discharge to Lake Liddell via site drainage and seepage to soil/groundwater through damaged pipework);
- landfills (composition of waste streams not entirely known, leachate generation may be occurring);
- the TransGrid switchyard (potential and historic leaks);
- fill material (site levelling and shoreline expansion using uncontrolled fill);
- the maintenance workshop, foam generator and unofficial laydown area (potential and historical leaks);
- the Ash Dam and associated pipelines (seepage to groundwater and surface water receptors and asbestos from pipelines);
- current and former coal storage areas (runoff or seepage to groundwater and surface water receptors;
- the machinery graveyard (potential and historic leaks);
- water intake and pump station (potential and historic leaks); and
- the former construction workshop and storage area (historic leaks).

#### 3 DATA QUALITY OBJECTIVES

Data Quality Objectives (DQOs) were developed to define the type and quality of data required to achieve the project objectives outlined in *Section 1.2* of this report. The DQOs have been prepared in line with the seven-step approach outlined in NSW Department of Environment and Conservation (DEC) (2006) *Guidelines for the NSW Site Auditor Scheme (2nd Edition)*, and with reference to relevant guidelines published by the NSW EPA, ANZECC/ARMCANZ, and NEPC.

The DQO process is validated, in part, by the quality assurance and quality control (QA/QC) procedures and assessment, summarised in *Section* 4.7 and presented as *Annex F* of this report.

The seven steps of the DQO process, and how they were applied to this assessment, are presented below in *Sections 3.1* to 3.7.

#### 3.1 STEP ONE: STATE THE PROBLEM

A statement of the problem is provided by the particular objectives of the assessment as stated in *Section 1.2*. Background information is provided by *Sections 1* and 2 of this report, and by the updated conceptual site model (CSM) presented in *Annex C* which was initially developed as part of the Preliminary ESA (ERM, 2013b).

#### 3.2 STEP TWO: IDENTIFY THE DECISIONS

#### Decision Statements

The principal decision to be made is:

• Are there actual or potential material contamination issues relevant to the proposed sale of the Liddell Power Station?

Additional decisions to be made include:

- Is there sufficient data to provide an environmental baseline at the time of the transaction?
- What is the nature and extent of soil and groundwater impact on or beneath the Site?
- Does the impact at the Site represent a risk to human health, based on the current and continued use of the site?
- Is the impact at the Site likely to warrant notification and/or regulation under the *NSW Contaminated Land Management Act (CLM Act)* 1997?
- Is material remediation likely to be required?

Adopted screening values and waste classification guidelines which will assist in making some of these decisions are identified in *Section 3.5.2*.

# 3.3 STEP 3: IDENTIFY INPUTS TO DECISION

The inputs required to make the above decisions are:

- existing relevant environmental data, taking into consideration the number and location of existing soil and groundwater sampling locations, the construction of existing groundwater monitoring wells and the date of the most recent sampling events;
- direct measurement of environmental variables including soil type, soil gas concentrations, odours, staining, water strike, groundwater level and water quality parameters;
- collection and laboratory analysis of soil and groundwater samples for identified COPCs;
- field and laboratory QA/QC data; and
- comparison of data against adopted screening values (outlined in *Section* 3.5.2).

# 3.4 STEP 4: DEFINE THE STUDY BOUNDARIES

#### Spatial Boundaries

The Site location and description is provided in *Section 2*. The site boundary and investigation areas are presented in *Figure 1* and *Figure 3* of *Annex A*. The physical spatial boundaries of the proposed investigation include the surface and subsurface soils as well as groundwater beneath the site. Vertical boundaries of the investigation were limited to the depth of borehole or monitoring well advancement.

# Temporal Boundaries

Temporally, the study is intended to provide a baseline assessment of the nature and extent of contamination at the Site, as at or near the time of completion of the transaction to the extent practicable.

#### Constraints within the Study Boundaries

Constraints on the delivery of the objectives of the Stage 2 ESA program within the study boundaries included:

- location of underground services or infrastructure;
- the condition of existing monitoring wells; and
- obtaining permission/access to difficult to access / remote areas (where deemed necessary.

# 3.5 STEP FIVE: DEVELOP A DECISION RULE

The DQOs were designed to facilitate the collection of adequate soil and groundwater data to address the decisions in Step 2 of the DQO process. During the course of the project, various constraints had varying impact on the implementation of the Stage 2 investigation program. Examples of these constraints included restrictions of citing investigations locations due to physical access or to the presence of sub-surface services and or depth constraints due to the presence of shallow bedrock or the absence of groundwater. Deviations from the Stage 2 program were tracked during the course of the investigation via the weekly progress spreadsheet and were communicated to the relevant project stakeholders. An extract of the weekly progress spreadsheet is provided below as *Table 3.1* which highlights locations proposed but abandoned during the course of the investigation.

-	AEC	Location	Туре	Total Depth (m bgl)	Comments
	LB	LB_MW02	Monitoring Well	1	Monitoring well location attempted but abandoned due to the presence of mine spoil.
	LB	LB_MW04	Monitoring Well	3	Monitoring well location attempted but abandoned due to the presence of mine spoil.
	LB	LB_MW07	Monitoring Well	15	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
	LB	LB_MW09	Monitoring Well	15	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.

# Table 3.1Completeness of Sampling Relative to the SAQP

AEC	Location	Туре	Total Depth (m bgl)	Comments
			( ~ 8-)	
LB	LB_MW10	Monitoring Well	2.1	Monitoring well location abandoned due to time constraints (soil borehole completed).
LB	LB_MW12	Monitoring Well	10	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LB	LB_MW15	Monitoring Well	13	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LD	LD_MW03	Monitoring Well		Monitoring well location abandoned due to the potential for unmarked subsurface utilities to be present.
LD	LD_SB02	Soil Bore		Subsurface utilities identified during NDD works (stormwater). Soil bore terminated
LF	LF_MW01	Monitoring Well	19.5	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LF	LF_SB01	Soil Bore	0.5	Soil bore terminated due to the presence of a second concrete slab the proximity to other utilities and high-voltage equipment.
LJ	LJ_MW03	Monitoring Well	0.35	Monitoring well location abandoned due to physical access constraints (known subsurface utilities).
LJ	LJ_SB01	Soil Bore		Soil bore abandoned due to physical access constraints (proximity to known subsurface utilities).
LJ	LJ_SB05	Soil Bore		Soil bore abandoned due to physical access constraints (proximity to known subsurface utilities).
LK	LK_MW01	Monitoring Well	14	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LK	LK_MW02	Monitoring Well	14	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LK	LK_MW03	Monitoring Well	15	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.

AEC	Location	Туре	Total Depth (m bgl)	Comments
LL	LL_MW01	Monitoring Well		Original LL_MW01 location abandoned due to proximity of archaeological artefacts and an Endangered Ecological Community. LL_MW01 completed at location LL_SB06.
LL	LL_MW04	Monitoring Well	15	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LL	LL_MW05	Monitoring Well	20	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LL	LL_MW08	Monitoring Well	20	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LL	LL_SB08	Soil Bore	0.65	Soil bore abandoned due to proximity of known subsurface utilities
LL	LL_SB16	Soil Bore		Soil bore abandoned due to proximity of known subsurface utilities.
LL	LL_SB17	Soil Bore	1.3	Soil bore terminated due to proximity of known subsurface utilities.
LM	LM_MW03	Monitoring Well	11.4	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LN	LN_MW03	Monitoring Well	1.5	Monitoring well abandoned due to inundation subsequent to NDD. Soil bore completed to 1.5 m bgl.
LO	LO_MW07	Monitoring Well		Monitoring well location abandoned due to physical access constraints (known subsurface utilities).
LO	LO_MW09	Monitoring Well		Monitoring well location abandoned due to physical access constraints (known subsurface utilities).
LQ	LQ_MW02	Monitoring Well	0.2	Monitoring well location abandoned due to physical access constraints (known subsurface utilities and the presence of a second concrete slab).
LQ	LQ_MW04	Monitoring Well	0.35	Monitoring well location abandoned due to physical access constraints (known subsurface utilities).

AEC	Location	Туре	Total Depth (m bgl)	Comments
LQ	LQ_SB09	Soil Bore		Soil bore location abandoned due to physical access constraints (known subsurface utilities and the presence of a second concrete slab).
LQ	LQ_SB12	Soil Bore		Soil bore location abandoned due to physical access constraints (known subsurface utilities and the presence of a second concrete slab).
LR	LR_MW02	Monitoring Well		Monitoring well location abandoned due to the presence of overhead transmission lines.
LV	LV_MW01	Monitoring Well	10	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LV	LV_MW02	Monitoring Well	15	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LV	LV_MW06	Monitoring Well	10	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LV	LV_MW07	Monitoring Well	16	Hole left open for 72 hrs. No groundwater ingress noted. Open hole backfilled and monitoring well abandoned.
LV	LV_MW08	Monitoring Well		Abandoned due to proximity to Drayton Mine and the expected depth to groundwater (>100m)
LV	LV_MW09	Monitoring Well		Abandoned due to proximity to Drayton Mine and the expected depth to groundwater (>100m)

# 3.5.1 Field and Laboratory QA/QC

The reliability of soil and groundwater data was assessed based on comparison with acceptable limits for field and laboratory QA/QC samples outlined in relevant guidelines made or approved under the *CLM Act* 1997, including the *ASC NEPM* (2013).

In the event that acceptable QA/QC limits were not met, the field observations of the samples were reviewed and if no obvious source for the non-conformance was identified (such as an error in sampling, preservation of sample(s) or heterogeneity of sample(s), etc.) liaison with the laboratories was undertaken in an effort to identify the issue that had given rise to the non-conformance.

A summary of the QA/QC procedures and assessment is presented in Section 4.7 and Annex F of this report.

# 3.5.2 Assessment Criteria

Individual soil and groundwater data, along with the maximum, minimum, mean, standard deviation and 95% Upper Confidence Limit (UCL) of the mean concentration (if required) were compared to adopted screening values.

Exceedence of adopted screening values does not necessarily indicate the requirement for remediation and/or a risk to human health and or the environment. If individual or 95% UCL concentrations exceed the adopted screening values, consideration of the extent of the impact, the potential for receptors to be exposed to the impact, and regulatory compliance was considered.

The adopted screening values have generally been sourced from guidelines made or approved under the *CLM Act* 1997, which includes the *ASC NEPM* (2013). Where alternative sources have been utilised, appropriate justification has been provided. A summary of the adopted screening values is provided in summary tables within *Annex B*.

# Soil Assessment Criteria

Soil data will be assessed against investigation criteria published in the following document:

• NEPC (2013) National Environment Protection (Assessment of Site Contamination) Amendment Measure 2013 (No. 1), Schedule B1 - Guideline on Investigation Levels for Soil and Groundwater, Health Investigation Level (HIL) 'D' - Commercial/Industrial, HIL 'C' - Public Open Space and Ecological Investigation / Screening Levels (EILs/ESLs) (as applicable). It is noted that laboratory analysis for pH and CEC is required to establish site specific EILs/ESLs, and an assessment of background conditions may be necessary. The establishment of EILs/ESLs will be undertaken in preparation of the Stage 2 ESA report, and sample locations in up-gradient non-operational areas may be utilised in establishing background conditions. Further, it is noted that whilst the HIL 'C' screening values are generally not applicable to undeveloped, urban bushlands and reserves, they will be adopted at sampling locations in non-operational areas considered to present a more sensitive land use category.

Application of the HILs will be considered on a case by case basis in accordance with the NEPM 2013 amendment to reflect local conditions encountered at the time of the intrusive works. Health Screening Levels for Vapour Intrusion and Direct Soil Contact (HSL) 'D' – Commercial/Industrial and Health Screening Levels for Vapour Intrusion and Direct Soil Contact Intrusive Maintenance Worker (Shallow Trench) will also be adopted.

# Groundwater Assessment Criteria

Water data will be assessed against investigation criteria published in NEPC (2013) *National Environment Protection (Assessment of Site Contamination) Amendment Measure 2013 (No. 1),* Schedule B1 - Guideline on Investigation Levels for Soil and Groundwater, which references the following guidance:

- Australia and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ ARMCANZ, 2000). Trigger values for fresh water, level of protection 95% species and level of protection 99% species (for bioaccumulation of mercury and selenium);
- The National Health and Medical Research Council (NHMRC) and Natural Resource Management Ministerial Council (NRMMC) (2011) *Australian Drinking Water Guidelines Paper 6 National Water Quality Management Strategy;*
- NHMRC (2008) *Guidelines for Managing Risks in Recreational Waters* (note that these will be applied with reference to NHMRC and NRMMC 2011 referenced above); and
- Cooperative Research Centre for Contamination Assessment and Remediation of the Environment (CRC CARE) *Technical Report No. 10, Health Screening Levels for Petroleum Hydrocarbons in Soil and Groundwater* (2011). Health Screening Levels for Vapour Intrusion (HSL) 'D' – Commercial/Industrial and Health Screening Levels for Vapour Intrusion -Intrusive Maintenance Worker (Shallow Trench).

# Waste Classification for Off-Site Disposal

Any excess soil or groundwater generated during the Stage 2 ESA program was classified in accordance with the NSW Department of Environment, Climate Change and Water *Waste Classification Guidelines, Part 1: Classifying Waste* (2009) and relevant associated Chemical Control Orders.

# 3.5.3 Appropriateness of Laboratory Limit of Reporting

Comparison of laboratory limits of reporting (LOR) to the screening values has been undertaken confirming that the screening values are less than the laboratory LOR with the exception of the following compounds:

- some volatile organic compounds in water (including vinyl chloride, chloromethane, bromomethane, 1,2-Dichloroethane, hexachlorobutadiene, 1,2,3-trichlorobenzene and 1,2-dibromomethane) and pentachlorophenol have LORs marginally above the adopted ecological protection criteria and/or above the drinking water guidelines. With the exception of vinyl chloride, it is noted that these contaminants are not regarded as key contaminants of concern and no drinking water receptors have been identified within the vicinity of the Site. In the event that a detection of these compounds is noted, further investigation and/or explanation may be required. As vinyl chloride is a breakdown product of PCE and TCE, detections of these compounds may trigger the need for further consideration; and
- Selenium and mercury in water have LORs marginally above the adopted 99% freshwater ecosystem protection guideline. This guideline has been adopted as a precautionary approach and it is noted that the LOR is below the 95% guideline value. A detection of either of these compounds may require further investigation and/or explanation.

# 3.6 STEP 6: SPECIFY LIMITS ON DECISION ERRORS

The acceptable limits on decision errors applied during the review of the results will be based on the data quality indicators (DQIs) of precision, accuracy, representativeness, comparability and completeness (PARCC) in accordance with NEPC (2013) *National Environment Protection (Assessment of Site Contamination) Amendment Measure 2013*, Schedule B3 - Guideline on Laboratory Analysis of Potentially Contaminated Soils.

The potential for significant decision errors were minimised by:

- completing a robust QA/QC assessment of the validation data and application of the probability that 95% of data will satisfy the DQIs, therefore a limit on the decision error would be 5% that a conclusive statement may be incorrect;
- assessing whether appropriate sampling and analytical density has been achieved for the purposes of providing a baseline of soil and groundwater conditions at the point of transaction; and
- ensuring that the criteria set was appropriate for the ongoing use of the site as a power generation facility.

# 3.7 STEP 7: DEVELOP (OPTIMISE) THE PLAN FOR COMPLETING THE WORKS

The DQOs were developed based on a review of existing data and discussions with Macquarie Generation. If data gathered during the assessment indicated that the objectives of the assessment programme were not being met, the sampling design (including sampling pattern, type of samples and analytes) was adjusted accordingly using feedback (where necessary) from project stakeholders.

#### 4 SAMPLING METHODOLOGY

#### 4.1 RATIONALE

Based on a review of the available data and the establishment of potential AECs, the most appropriate sampling design to achieve the stated project objectives was considered to be primarily based on a judgemental (targeted) sampling program, which in itself provides good coverage of operational areas, and minimal additional sampling undertaken to provide spatial coverage for low risk areas of the site (e.g. buffer lands) or to fill material data gaps within the CSM. It is noted that intrusive investigations were limited to areas where access and site activities enabled investigations to occur without unacceptable health and safety risks to personnel and/or unacceptable disruption to site operations. The sampling plan was discussed with site management prior to the commencement of works to assess this risk and was subject to minor alteration.

Given the scale of the Site, different sampling densities were adopted based on estimated contamination risk and logistical constraints of different areas of the site. The sampling approach was generally in accordance with the NSW EPA *Sampling Design Guidelines* (1995) which does not recommend a minimum number of sampling points for sites larger than 5.0 ha. As recommended in these guidelines, the Site was divided into smaller areas of concern based on a review of historical activities and identified potentially contaminating activities.

#### 4.2 SITE INSPECTION

The work areas of the Site were inspected and the soil and groundwater sampling locations were marked out to target identified Site features and potential contamination sources. At the same time as clarifying the investigation locations, sub-surface utilities were marked out using an appropriately qualified service locator. Ground penetrating radar (GPR) and cable avoidance tool (CAT), along with DBYD plans and Site engineering drawings were utilised to identify underground services and utilities.

#### 4.3 SOIL INVESTIGATION

#### 4.3.1 Soil Sampling Procedure

Soil investigation and sampling works were undertaken in general accordance with ERM's Standard Operating Procedures (SOPs). The location and number of sampling locations are presented within *Figures 4.1 to 4.5* of *Annex A*.

Where practicable, all boreholes were advanced to an initial depth of 1.5 m bgl using hand augering and / or vacuum excavation techniques in accordance with ERM's Sub-Surface Clearance (SSC) procedures. Drilling and soil sampling of subsurface material beyond 1.5 m bgl, were undertaken using a Geoprobe® drilling rig with a continuous push tube sampler where conditions allowed. Other methods of borehole advancement included solid stem mechanical augering, and air rotary methods, where bedrock was encountered or subsurface material could not be penetrated using push tube methods.

Regardless of the drilling methodology adopted, soil sampling techniques which minimised the potential for loss of volatiles to the extent practicable were utilised. Where the collection of undisturbed samples was not possible (e.g. during hand augering) the potential for loss of volatiles was minimised by sampling from larger clods and minimising the duration between sample collection and placement into the sample container.

Field screening was conducted in accordance with ERM's SOPs using a Photo-Ionisation Detector (PID) fitted with a 10.6 eV lamp, calibrated at the beginning of each working day. Calibration certificates are presented in *Annex E*. Where practicable, soil was collected at 0.5 m depth intervals (or where significant changes in lithology were identified) to 2 m bgl and at 1 m depth intervals thereafter. Soil samples were placed in a zip lock bag, sealed and screened for the presence of ionisable volatile compounds. Where the presence of volatiles or other impact was suspected, additional samples were collected.

Soil properties were logged by an appropriately trained and experienced field scientist in general accordance with *Australian Standard AS* 1726-1993, *Geotechnical Site Investigations* (Australian Standards Committee, 1993). Representative soil samples were collected for laboratory analysis at selected locations, based on visual and/or olfactory evidence of the following:

- multiple layers of fill material;
- changes in the soil profile; and
- potential impact.

Soil samples were collected, to the extent practicable, in accordance with techniques described in *Australian Standard AS4482-2005* (Parts 1 and 2) to maintain the representativeness and integrity of the samples. Soil samples for laboratory analysis were collected from either the hand auger or directly from the push tube core. No samples were collected directly for laboratory analysis from solid flight augers, unless otherwise stated within borehole logs presented in *Annex D*. The frequency and nature of field QA/QC samples collected during the assessment works are summarised in *Annex F*.
Soil samples were generally labelled using the nomenclature presented in *Table 4.1* (below).

Table 4.1Sample Naming Protocol

Sample	Identification
Surficial sample taken from SU01 within work area LB	LB_SU01
Sample taken from shallow hand auger soil bore or deeper soil bore, SB01 at depth of 0.5 m bgl, within work area LB	LB_SB01-0.5
Sample taken from depth of 5 m bgl from a soil bore to be installed as Monitoring Well MW07, within work area LB	LB_MW07-5.0
Sample taken from existing monitoring well MW01 within work area LB	LB_EW_MW01

Sample jars were sealed and immediately placed in an insulated cooler, on ice, and stored to minimise potential loss or degradation of volatile compounds. Samples were shipped under chain of custody documentation to the analytical laboratory. Trip blanks and field blanks were used to assess if cross contamination occurred during the sample collection process.

Soil samples were collected for asbestos analysis in general accordance with the *ASC NEPM* (2013) and the ERM *Assessment of Asbestos Impacted Areas SOP* (2012). If potential asbestos containing material (ACM) was identified, representative fragments were collected from the work area and placed in snap lock bags. These samples were submitted to the primary laboratory for analysis, to confirm the presence or absence of asbestos.

Where asbestos was not observed at the surface or during the investigation works, discrete 500 mg samples of soil were collected in snap lock bags. These samples were submitted to the laboratory for asbestos identification and (where identified) quantification (%w/w analysis) in accordance with the WA DOH (2009) guidelines.

## 4.3.2 Decontamination Procedure

Down-hole drilling and sampling equipment were decontaminated by initially removing any residual soil with a stiff brush and then washing the equipment in a 2% Decon 90 solution and rinsing with potable water.

#### 4.3.3 Soil Bore Reinstatement

Upon completion, soil bores not scheduled to be converted to monitoring wells were backfilled and the surface covering reinstated to match existing.

# 4.3.4 Waste Materials Generated During Drilling

All non-liquid waste materials generated during drilling works were stored on-site in drums or other appropriate sealed containers at a designated staging area. If evidence of significant contamination is observed during drilling (e.g. staining or odour) an attempt will be made to store any potentially impacted wastes separately. All wastes were disposed off-site to an appropriately licenced landfill by an approved and appropriately licensed waste removal contractor.

# 4.4 GROUNDWATER INVESTIGATION

## 4.4.1 Monitoring Well Construction

Selected boreholes were converted to groundwater monitoring wells in accordance with ERMs SOPs. The groundwater monitoring well locations are presented in *Figures 4.1 to 4.5* of *Annex A*. The following methodology was implemented to install new monitoring wells:

- wells were constructed of heavy duty 50 mm diameter class 18 uPVC with factory slotted screen (0.4 mm slots) and plain well casing. Where practicable, the wells were screened within groundwater bearing strata in accordance with ERMs SOPs with consideration of potential regional and seasonal fluctuations of the water table and constructed to allow the potential ingress of non-aqueous phase liquids (NAPLs);
- following drilling, the well casing and screen were inserted into the drill casing. Washed and graded filter sand was poured into the annulus between the well screen and casing wall, ensuring that the sand covered the entire screened level and generally extended approximately 0.5 m above the top of the well screen;
- bentonite granules were then poured on top of the sand to an approximate thickness of 1 m and hydrated to effectively seal off the well from surface water or perched/shallow groundwater inflows; and
- the remaining annulus from the top of the seal to the base of the concrete was grouted with cement/bentonite grout to within 0.25 m of the surface and the final 0.25 m reinstated with concrete and a heavy duty well cover (flush gatic cover or raised monument as appropriate). The well casings were sealed with air-tight, lockable 'envirocaps'.

Following monitoring well installation, each well was developed using a submersible 12 V electric 'Typhoon' pump to remove any fine or granular materials or contaminants potentially introduced during drilling and to optimise hydraulic connectivity with the surrounding aquifer.

Wells were considered developed when either a minimum of 10 well volumes had been removed, when water quality parameters had stabilised or if the well was developed dry prior to this. Where sufficient well volumed could not be obtained, attempts were made to remove fines and construction material by purging the well over several days to allow for recharge.

Monitoring well construction details are presented within the borehole logs in *Annex D*.

# 4.4.2 Groundwater Purging and Sampling Protocol

Groundwater purging and the sampling of newly installed monitoring wells generally occurred at least one week following monitoring well installation and development, to allow subsurface conditions to stabilise. Both new and existing monitoring wells were purged and sampled as outlined below.

The presence of odours was noted, where applicable, following removal of the well cap and prior to purging. Any odours were described by reference to their intensity and character.

Following a period of no pumping (as a minimum 24 hours), wells were dipped to gauge the depth to groundwater, and the potential presence and depths of NAPLs.

Monitoring wells were purged using either a thoroughly decontaminated peristaltic or micro purge pump under low flow conditions, where hydrogeological conditions allowed, until sufficient water has been removed to obtain stabilised readings of pH, conductivity, redox potential, temperature and dissolved oxygen which was calibrated prior to use. The stabilisation criteria are as described below.

# Table 4.2Water quality parameter stabilisation criteria

Parameter	Stabilisation criteria
pH	± 0.1 pH units
Electric Conductivity (EC)	± 3% (μS/cm or mS/cm)
Temperature	± 0.5°C
Oxidation Reduction Potential (ORP)	± 10 mV
Dissolved Oxygen (DO)	± 0.3 mg/L

It is noted that both ORP and DO are typically slower to stabilise than the other parameters. Where ORP and DO did not stabilise, therefore, greater weight was given to pH and EC as the stabilising parameters.

Low-flow sampling methodology was generally used to obtain samples that were representative of the local groundwater environment at the Site, with the exception of the use of bailers where well recharge was poor or insufficient groundwater was available for sampling using low flow methodology.

The inlet of the micro purge pump was placed approximately 50 cm from the base of the well in order to obtain a representative sample. Water samples were collected using equipment dedicated to each monitoring well to reduce the potential for cross-contamination between sampling locations.

The following order of sampling was adopted:

- samples to be analysed for volatile compounds placed into 40 mL amber vials;
- samples to be analysed for semi-volatile compounds placed into one 250 mL solvent washed amber bottles and two 1 litre solvent washed amber bottles;
- samples to be analysed for metals filtered through disposable  $0.45 \,\mu m$  filters and placed in 125 mL plastic bottles preserved with nitric acid; and
- samples to be analysed for PFOS/PFOA placed into 125 mL plastic (Teflon free) unpreserved bottles.

No actual or suspected Non-Aqueous Phase Liquids (NAPLs) were observed during the groundwater monitoring and sampling event.

The containers were filled, where practical, to minimise headspace, before being sealed and appropriately labelled. Labels included the following information:

- sample identification number;
- sampler;
- job number; and
- date of collection.

Samples were sealed and immediately placed in a cooler on ice to minimise potential for degradation of the sample. All samples were shipped under chain of custody documentation to the analytical laboratories.

## 4.4.3 Waste Material Generated During Groundwater Development/Purging

Waste water from development and purging of groundwater monitoring wells was collected and stored in appropriately labelled intermediate bulk containers (IBCs) and was subsequently classified for off-site disposal at an appropriately licenced facility.

#### 4.5 SURVEYING

All investigation locations were digitally located by field staff with a handheld Global Positioning System (GPS) unit. Additionally, all groundwater monitoring wells were surveyed by a registered surveyor (Tony Mexon and Associates) to AHD for elevation and MGA coordinates for location. The elevation of the highest point of the top of the uPVC well casing was surveyed to facilitate appropriate groundwater elevation calculations and groundwater flow direction interpretations.

## 4.6 LABORATORY ANALYSIS

The laboratories used for the investigations were accredited by the National Association of Testing Authorities (NATA), Australia. The primary laboratory used for soil and groundwater analysis was ALS Environmental Pty Ltd (ALS). Inter-laboratory duplicate samples were analysed by a secondary laboratory, Envirolab Services Pty Ltd (Envirolab). The analytical methods used by each laboratory are provided in the laboratory certificates in *Annex H*.

Soil and groundwater samples were analysed for the following COPCs:

- metals and metalloids (arsenic, cadmium, chromium, copper, nickel, lead, mercury, selenium and zinc);
- Total Recoverable Hydrocarbons (TRH);
- Polycyclic Aromatic Hydrocarbons (PAHs); and
- Benzene, Toluene, Ethylbenzene and Xylenes (BTEX).

Additional contaminants of concern were analysed on a sub-section of the soil and groundwater samples collected. These contaminants included:

- barium, beryllium, boron, cobalt, manganese, molybdenum, thallium, vanadium;
- asbestos (presence / absence, and quantification where asbestos was identified – soil only);
- Polychlorinated Biphenyls (PCBs) related to use of PCB-containing transformer oils on site;
- Volatile Organic Compounds (VOCs); and
- Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA) to target areas where fire retardants may have been used or stored.

Selected soil samples were also analysed for the following to allow for adoption of appropriate screening levels:

- Total Organic Carbon (TOC);
- Particle Size Distribution (PSD);
- Electrical Conductivity (EC); and
- pH and Cation Exchange Capacity (CEC).

# 4.7 QUALITY ASSURANCE/QUALITY CONTROL

A detailed QA/QC report including field procedures, laboratory methods and an analysis of QA/QC results from the investigation is provided in *Annex F*. QA/QC information incorporating inter-laboratory and intra-laboratory duplicates, rinsate samples and trip spike/blank samples is also presented in *Annex F*.

There were some instances where the adopted screening levels were less than the laboratory LOR. These potential non-conformances have been discussed in *Section 3.5.3* of this report.

#### 5 **RESULTS AND DISCUSSION**

#### 5.1 SITE GEOLOGY OBSERVATIONS

A generalised description of the lithology encountered at the Site is presented in Table 5.1. Detailed descriptions of the Site geology as observed during the investigation are presented on the borehole logs in Annex D.

Within disturbed portions of the Site, subsurface soil conditions largely comprised filling or reworked natural weathered soils and rock overlying natural bedrock. The exception to this was areas to the east of the Power Station where various types of fill material were also placed to extend the shoreline (e.g. other virgin excavated material from across the site, waste stream materials such as coal fines, ash and material dredged from the oil and grit trap, and other general station rubbish).

Within undisturbed areas, native soils were present at shallow depths with varying degrees of weathering and some alluvial deposits observed adjacent to water courses. The depth to bedrock varied across the Site with topography but was generally within 1 m of the surface with outcropping of siltstone and sandstone bedrock observed at elevated areas.

Lithological Unit	Description	Depth (m bgl) <sup>1</sup>
Hard standing (present in operational locations)	Concrete or bitumen, generally in good condition	0 - 0.4
Fill	Reworked silty clay, clay and/or gravel, brown or brown with orange or grey mottling, dry to moist, non-plastic	up to 2.5
Silty Clay	Orange-brown with grey mottling and light brown with grey mottling, moist, shale or siltstone gravel inclusions (weathered)	0.5 - 1.0
Bedrock	Siltstone, shale or sandstone bedrock, brown grading to grey with depth, generally dry, fine grained.	1.0 - 20

#### Table 5.1 Generalised Field Lithology Descriptions

Given the variation in topography across the Site, depths and lithologies varied.

## 5.2 GROUNDWATER FIELD OBSERVATIONS

Existing groundwater monitoring wells on-site were gauged and sampled between 20 November 2013 and 25 November 2013. Due to access constraints, the existing wells could not be gauged in a single event on the same calendar day.

Newly installed monitoring wells were generally gauged and sampled at least 72 hours after well installation and development to allow subsurface conditions to stabilise. Groundwater gauging and sampling was completed between 25 November 2013 and 20 December 2013. During this time, a total of 63.3 mm of rain was recorded. Rainfall was largely recorded between 25 November and 6 December, 2013.

Groundwater gauging data is presented in *Table 2* of *Annex B*. Groundwater was encountered at depths of between 0.54 m bgl and 14.58 m bgl.

Field records for groundwater well development and sampling are presented in *Annex E*. Groundwater field parameters recorded during purging of wells, prior to sampling, are presented in *Table 3* of *Annex B*.

## 5.3 AREAS OF ENVIRONMENTAL CONCERN (AEC) SUMMARY

## 5.3.1 Area LA – Ammonia Plant

## Background

The ammonia plant is located approximately 100 m to the south west of the main power block. Anhydrous ammonia (stored in bullets) is mixed into solution within the plant. The mixing tank within this area is externally water cooled as the reaction is exothermic. Pipelines then carry the aqueous ammonia to the demineralisation plant. Any discharges from the ammonia plant discharge directly to surface drains which flow into the Outfall Canal.

Anecdotal evidence provided by Site personnel during ERM's previous site visit indicated that a historical leak of an aqueous ammonia solution to ground occurred in this area. The date of the incident and the volume of aqueous ammonia solution involved were unknown to the personnel, however.

During the Site inspection (conducted on 19 and 20 August, 2013 by ERM as part of the Preliminary ESA), a building was identified within this area which was believed to contain asbestos and exhibited signs of building material deterioration.

Based on the site inspections and site history, potential issues pertaining to this area were considered to be possible contamination of shallow soils by asbestos and/or aqueous ammonia solution and contamination of groundwater with aqueous ammonia solution.

Further information regarding the Ammonia Plant is provided in the Preliminary ESA (ERM, 2013b).

## AEC Investigation Methodology and Field Observations

A total of five soil investigation bores, of which three were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Figure 3* of *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted during drilling works within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.3 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.2*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence of Contamination	
LA_SB01	3.2	None	0.0 - 0.1
LA_SB02	3.2	None	0.0
LA_MW01	10.0	None	0.0 - 0.3
LA_MW02	8.0	None	0.0
LA_MW03	10.0	None	0.0

## Table 5.2Field Observations Summary - AEC LA

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range, with electrical conductivity readings indicating that groundwater conditions were saline.

No indications of contamination, such as sheens or odours, were observed during groundwater sampling within this AEC. An organic odour was observed during sampling, but is not considered to be indicative of potential contamination. A summary of field observations from the groundwater sampling works are presented within *Table 3 of Annex B*.

## Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

## Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC, with the exception of detections of some metals within groundwater across this AEC.

Cadmium, copper, manganese, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

## Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

All monitoring wells within this AEC reported metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, manganese, nickel and zinc. Concentrations of cadmium and nickel in excess of the adopted human health (drinking water) screening values were also detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself.

The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

## 5.3.2 Area LB – Ash Dam

## Background

The Liddell Ash Dam is located approximately four km to the west of the main power block. The western boundary adjoins the Drayton Coal Mine. The Ash Dam is in the upper catchment of Bayswater Creek and was constructed by damming a natural valley. The dam has been in use since Liddell Power Station commenced operation and has been progressively expanded under various planning instruments resulting in a surface area of approximately 2.7 km<sup>2</sup> (Coffey 2012). At the time of the site inspection carried out as part of the Preliminary ESA (ERM, 2013b), works were underway to further increase the capacity of the dam by increasing the height of the dam walls.

The Ash Dam currently accepts approximately 1 million cubic metres (m<sup>3</sup>) of fly and bottom ash from the Liddell Power Station per year, along with sand filter backwash and treated water from the sewage treatment plant. Macquarie Generation personnel also indicated that fabric filter bags and bonded asbestos cement pipe sections have previously been disposed of in the Ash Dam. Further, pipework that connects this area to the main power block contains asbestos cement.

There are several potential water discharge points from the Ash Dam area. These are the Ash Skimmer Dam, seepage through the Ash Dam wall itself, seepage through the base to groundwater and Tinkers Creek. Tinkers Creek is situated downstream from the ash dam area and acts as a potential contaminant pathway as it flows into Lake Liddell. A settling pond is located between the dam and Tinkers Creek to provide some control on the particulate discharge to the creek.

The Ash Dam is considered an AEC based on the potential inputs to, and migration from the dam, including specific contaminants such as metals and petroleum hydrocarbons, as well as the saline nature of the water that may potentially seep or discharge from the dam to receiving environments (primarily Lake Liddell and associated tributaries).

Given the limited availability of previous environmental characterisation works and sampling infrastructure, the potential COPCs identified, further investigation was considered to be required to provide a baseline for this area and to assess potential material issues associated with soil and groundwater contamination.

Potential issues pertaining to this area were considered to be contamination of soil, groundwater and sediment from seepage/leachate or overflow.

#### AEC Investigation Methodology and Field Observations

A total of fifteen soil investigation bores, of which eight were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 1.1 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.3*.

## Table 5.3Field Observations Summary - AEC LB

		Visual or Olfactory Evidence of	
Borehole ID	Depth (m bgl)	Contamination	PID Range (ppm)
LB_MW01	11	None	0.0 - 0.1
LB_MW02	1	None	-
LB_MW03	2	None	-
LB_MW04	3	None	0
LB_MW05	5.5	None	0.1 – 0.5
LB_MW06	3.5	None	0.2 – 0.5
LB_MW07	15	None	0.0 - 0.3
LB_MW08	10	None	0.2 - 0.7
LB_MW09	15	None	-
LB_MW10	2.1	None	0.2 - 0.7
LB_MW11	7.5	None	0.0 - 0.2
LB_MW12	10	None	0.0 – 0.5
LB_MW13	7	None	0.0 - 0.07
LB_MW14	5.5	None	0.0 - 1.1
LB_MW15	13	None	0.0 - 0.9
LB_SU01	0.1	None	N/A
LB_SU02	0.1	None	N/A
LB_SU03	0.1	None	N/A
LB_SU04	0.1	None	N/A
LB_SU05	0.1	None	N/A

		Visual or Olfactory Evidence of	
Borehole ID	Depth (m bgl)	Contamination	PID Range (ppm)
LB_SU06	0.1	None	N/A
LB_SU07	0.1	None	N/A
LB_SU08	0.1	None	N/A
LB_SU09	0.1	None	N/A
LB_SU10	0.1	None	N/A
LB_SU11	0.1	None	N/A
LB_SU12	0.1	None	N/A
LB_SU13	0.1	None	N/A
LB_SU14	0.1	None	N/A
LB_SU15	0.1	None	N/A
LB_SU16	0.1	None	N/A
LB_SU17	0.1	Fragment of fibrous cement pipe	N/A
LB_SU18	0.1	Fragment of fibrous cement pipe	N/A
LB_SU19	0.1	Fragment of fibrous cement pipe	N/A
LB_SU20	0.1	None	N/A
LB_SU21	0.1	None	N/A
LB_SU22	0.1	None	N/A
LB_SU23	0.1	None	N/A
LB_SU24	0.1	None	N/A
LB_SU25	0.1	None	N/A
LB_SU26	0.1	None	N/A
LB_SU27	0.1	None	N/A

	5 4 4 5 5	Visual or Olfactory Evidence of	
Borehole ID	Depth (m bgl)	Contamination	PID Range (ppm)
LB_SU28	0.1	None	N/A
LB_SU29	0.1	None	N/A
LB_SU30	0.1	None	N/A
LB_SU31	0.1	None	N/A
LB_SU32	0.1	None	N/A
LB_SU33	0.1	None	N/A
LB_SU34	0.1	None	N/A
LB_SU35	0.1	None	N/A
LB_SU36	0.1	None	N/A
LB_SU37	0.1	None	N/A
LB_SU38	0.1	None	N/A
LB_SU39	0.1	None	N/A
LB_SU40	0.1	None Fibrous cement fragment (2mm y	N/A
LB_SU41	0.1	20mm x 20mm)	N/A
LB_SU42	0.1	None	N/A
LB_SU43	0.1	None	N/A
LB_SU44	0.1	Possible fibres	N/A
LB_SU45	0.1	Possible fibres	N/A
LB_SU46	0.1	Fragment of fibrous cement pipe	N/A

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range, with electrical conductivity readings indicating that groundwater conditions were saline at LB\_MW02 and LB\_MW03. Electrical conductivity readings collected at LB\_MW01 (121.2  $\mu$ S/cm) indicated fresh water conditions; however it is considered possible that this reading was erroneous due to the saline groundwater observed in other wells in this area.

No indications of contamination, such as sheens or odours, were observed during groundwater sampling within this AEC. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

## Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Asbestos was detected in surface soils collected from several locations beneath the ash and dust disposal pipeline bench leading from the main operational area of the power plant to the ash dam. Of the forty-six sampling locations beneath these pipelines, asbestos was detected in sixteen locations in surface soils (a combination of chrysotile and / or amosite). Asbestos quantification results were reported above the human health screening criteria for three of the sixteen samples where asbestos was identified..

## Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Table 3 of Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC and TRH  $C_{10}$ - $C_{14}$  equal to or marginally above the laboratory LOR in groundwater collected from LB\_MW03 and LB\_MW11.

Boron, cadmium, copper, manganese, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

#### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC with the exception of asbestos in surface soils beneath the ash and dust and return water pipelines from the main operational area to the ash dam. The asbestos quantification results for thirteen samples collected from BE\_MW01 were below the screening criteria. Given that these samples were collected at the ground surface and asbestos was detected, further consideration is warranted in accordance with guidance. These detections of asbestos in surface soils are likely to be due to the deterioration of the ash and dust and return water pipelines over time, which are constructed of ACM. Although various sections of these pipelines were sealed between 2001 and 2010, the protective coating may have degraded (Macquarie Generation, 2013). If left unmanaged, this asbestos could present a potential health risk to workers and other users of the site in the vicinity of the pipelines.

All samples collected from monitoring wells within this AEC were reported with metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included boron, cadmium, copper, lead, manganese, mercury, nickel, selenium and zinc. Concentrations of lead, nickel and selenium in excess of the adopted human health (drinking water and/or recreational) screening values were also detected in a number of samples. The NSW EPA has required a Pollution Reduction Program report to be developed in relation to managing surface and groundwater issues in the vicinity of Liddell Ash Dam, with a reporting deadline of 31 January 2014.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself.

The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

#### 5.3.3 Area LC – Bulk Fuel Storage – Light-Vehicle Refuelling Area

#### Background

This area contains an unleaded and a diesel UST with a shed containing two fuel dispensers. There are also associated underground fuel lines, plus fill points and vents. Integrity tests completed in February 2013 indicated that Diesel Tank 1 passed, but that Unleaded Petrol (ULP) Tank 1 failed the ullage test and had a visibly leaking riser (Leighton O'Brien Field Services Pty Ltd, 2013). The results of a follow-up test in November 2013 following repairs to ULP Tank 1 indicated that there were no integrity test failures.

The area has been previously investigated as per the requirements of the *Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2008* (the 'UPSS Regulation'), with four monitoring wells installed. Sampling of these wells indicated detectable concentrations of COPCs. Interviews with Macquarie Generation personnel also revealed that two USTs have previously been removed from this area, with each reported by Macquarie Generation personnel to be observed in poor condition, including suspected holes within associated fuel lines during removal. No tank removal/destruction certificates were available for review.

While previous environmental characterisation work has been undertaken to investigate this potential source, based on the results obtained and complications relating to the assessment of groundwater flow direction and recharge rates, further investigation in the form of resampling of these wells and additional investigation locations in the broader area was considered warranted to assess potential contamination of soil and groundwater within the area.

#### AEC Investigation Methodology and Field Observations

ERM did not conduct any intrusive works within AEC LC as this area had previously been investigated by DLA Environmental (2011).

Existing Well ID	Visual or Olfactory Evidence of Contamination
LC_EW_L1	Hydrocarbon odour observed during groundwater sampling
LC_EW_L2	Hydrocarbon odour observed during groundwater sampling
LC_EW_L3	Hydrocarbon odour observed during groundwater sampling
LC_EW_L4	Hydrocarbon odour observed during groundwater sampling

Table 5.4Field Observations Summary - AEC LC

Groundwater field parameter readings collected during the sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range, with the exception of electrical conductivity, which were low at all wells sampled within this AEC (between 0.1 and 31.8  $\mu$ s/cm). Taking into account the saline groundwater observed in other wells in the vicinity, it is unlikely that these readings were accurate and may be indicative of a malfunctioning water quality probe.

Hydrocarbon odour was observed during groundwater sampling at all wells within this AEC; however no sheen or NAPL was observed. A summary of field observations from the groundwater sampling works are presented within Table 3 of Annex B.

#### Soil Analytical Results

No soil samples were collected from within this AEC.

## Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of a number of COPCs were above the laboratory LOR in groundwater samples collected from within this AEC. These included concentrations of dissolved phase hydrocarbons detected in groundwater sampled from all monitoring wells within this AEC.

Concentrations of benzene, toluene, ethylbenzene, xylene, naphthalene and TRH ( $C_6$ - $C_{10}$  minus BTEX) in excess of the adopted screening values were detected in a number of groundwater samples collected from the wells within this AEC.

Copper, mercury, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

#### Discussion

Groundwater samples from three of the four monitoring wells within this AEC were found to contain concentrations of dissolved phase hydrocarbons that exceeded adopted screening values including human health (vapour intrusion – commercial workers and intrusive maintenance workers, drinking water and recreational) and ecological screening values.

Dissolved phase hydrocarbons of concern included benzene, toluene, ethylbenzene, xylene, naphthalene and TRH (C6-C10 minus BTEX). Due to the unsealed nature of the area where the USTs are located, and the presence of an enclosed stores building nearby, there is some potential risk to commercial workers from inhalation of vapours from these contaminants. Further assessment may therefore be required.

Based on the concentrations of hydrocarbons observed in groundwater and the distance of approximately 190 metres to Lake Liddell's nearest point, it is possible that migration of contaminants from this area to Lake Liddell may result in potential risk to ecological and human (recreational) users of the lake. Further assessment may therefore be required.

Samples collected from all monitoring wells within this AEC were reported with metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included copper, mercury, nickel, and zinc. Concentrations of nickel in excess of the adopted human health (drinking water) screening values were also detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

## 5.3.4 Area LD – Bulk Fuel Storage – Mobile Refuelling Area

## Background

The mobile refuelling area is located to the south-west of the main power block and immediately to the west of the coal storage facility.

A number of potential contamination sources, both current and historic, were identified during the Preliminary ESA (ERM, 2013b):

• A former UST (100 000 L), now removed, and associated fuel lines, remote fill point and oil water separator that remain in-situ. The tank removal/destruction certificate was not available for review. Anecdotal evidence provided by Macquarie Generation personnel indicated that the tank was observed to be in poor condition upon removal.

- An existing self-contained diesel AST where a spill was recently reported by Macquarie Generation personnel during refuelling. According to information provided by Macquarie Generation, visually impacted soil is understood to have been removed; however no investigation of groundwater impact was previously undertaken. It was also observed during the previous ERM site visit that the pipework connecting the tank to the refuelling bay (routed around the external walls of the workshop building) had a number of elbow joints which showed signs of staining, indicating that leaks may have occurred.
- An existing waste oil UST located on the eastern side of the maintenance workshop with evidence of staining within the bund. It was also observed during the previous ERM site visit that a bund overflow valve was present which, if opened, may allow discharges to ground outside the bund.
- Lubricant Bay and Maintenance Workshop with observations of heavy staining within the drainage system, which suggests historic leakage or spills in this area.

While previous environmental characterisation work was undertaken to remove the UST and achieve compliance with NSW UPSS Regulations, based on the aggregation of potential sources in this location, further investigation in the form of resampling of these wells and additional intrusive investigation works within the AEC were considered warranted to assess potential soil and groundwater contamination.

## AEC Investigation Methodology and Field Observations

A total of eight soil investigation boreholes, of which four were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.3 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.5*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		<b>Evidence of Contamination</b>	
LD_SB01	3.2	None	0.0
LD_SB02	1.0	None	0.0
LD_SB03	3.2	None	0.0
LD_SB04	3.0	None	0.0
LD_MW01	9.0	None	0.0
LD_MW02	7.5	None	0.0 - 0.2
LD_MW04	8.7	None	0.0 - 0.3
LD_MW05	9.5	None	0.0 - 0.14
LD_EW_MW01	N/A	None	N/A
LD_EW_MW02	N/A	None	N/A
LD_EW_MW03	N/A	None	N/A
LD_EW_MW04	N/A	None	N/A

Table 5.5Field Observations Summary - AEC LD

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range, with the exception of electrical conductivity, which were low at several wells sampled within this AEC (between 0.7 and 18.5  $\mu$ s/cm). Based on the saline nature of other wells in this AEC and in surrounding areas, these abnormally low electrical conductivity readings may be erroneous.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A slight organic odour was observed at LD\_MW04, which was not considered indicative of potential contamination. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

#### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of TRH fractions, BTEX, PAHs and phenols were detected in the majority of soil samples collected from within this AEC. All concentrations were below adopted screening values with the exception of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in a number of samples, which exceeded adopted ESLs.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values. Asbestos was not detected in soils sampled within this AEC.

## Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across the AEC.

Cadmium, copper, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

## Discussion

Soil samples collected from a number of locations within this AEC were reported with concentrations of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in excess of adopted ESLs. All concentrations, however, were below adopted human health screening values. Given that the highest concentrations of petroleum hydrocarbons were reported for samples collected at 0.1 m bgl, it is considered likely that aboveground releases were responsible for the observed impacts in soil within this AEC. As this area is predominantly covered in hard standing or compacted gravel, the ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the ESLs are considered overly conservative.

All groundwater samples collected from monitoring wells within this AEC contained concentrations of metals greater than adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, nickel and zinc. Concentrations of nickel in excess of adopted human health (drinking water) screening values were also reported in a number of wells.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

#### 5.3.5 Area LE – Bulk Fuel Storage – Fuel Oil Installation ASTs

#### Background

The Fuel Oil Installation stores large quantities of fuel (primarily diesel) for boiler ignition and is located on the south-east corner of the power block. The tanks in this area contain four active tanks (A-D) and two disused tanks (E-F) with the latter likely to contain residual sludge. Documents reviewed and information provided by Macquarie Generation during the previous site visit indicate there have been historical underground and above ground pipework leakages. Spills in the bunded sections of this area or at the refuelling points or vehicle wash down bays are routed to a blind sump which is pumped out regularly. Integrity testing of the tanks and wet stock reconciliation information is understood to be undertaken but was not available for review.

Given the absence of previous environmental characterisation work, and based on the history of fuel storage and potential release, further investigation was considered to be required to provide a baseline for contamination in this area.

#### AEC Investigation Methodology and Field Observations

A total of sixteen soil investigation bores, of which nine were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

Staining was observed at LE\_SB06, LE\_SB07, LE\_MW03 and LE\_MW04 while hydrocarbon odours were observed at the majority of locations in this AEC as detailed in *Table 5.6*. Some elevated concentrations of ionisable volatile compounds measured via headspace analysis up to 374.4 ppm v (isobutylene equivalent) were identified in soil samples collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.6*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		<b>Evidence of Contamination</b>	
LE_SB02/LE_MW09	7.0	HC odour (1.35 – 7.0 m bgl)	0.0 - 12.3
LE_SB03	2.6	HC odour (1.5 – 2.6 m bgl)	5.9 - 37.2
LE_SB04	3.2	HC odour (2.0 – 2.2 m bgl)	0.0 - 12.76
LE_SB05	3.2	None	0.0 - 0.1
LE_SB06	3.2	HC odour and staining (0.85	0.0 - 272.9
		– 2.9 m bgl)	
LE_SB07	3.2	HC odour and staining (1.5	0.0 - 103.0
		– 2.0 m bgl)	
LE_SB08	3.2	None	0.0
LE_SB09	3.6	None	112 - 215
LE_MW01	6.3	None	0.0 - 1.0
LE_MW02	7.0	None	0.0

#### Table 5.6Field Observations Summary - AEC LE

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		<b>Evidence of Contamination</b>	
LE_MW03	5.7	HC odour and staining (1.7	0.0 - 84.3
		– 2.7 m bgl)	
LE_MW04	7.3	HC odour (0.3 m bgl); HC	0.0 - 374.4
		odour and staining (1.5 – 2.0	
		m bgl)	
LE_MW05	7.0	Hydrocarbon odour during	0.0
		groundwater sampling	
LE_MW06	5.5	Hydrocarbon odour during	0.0 - 0.1
		groundwater sampling	
LE_MW07	7.0	'Oily' odour (2.0 m bgl; 4.3 –	0.2 - 121.4
		7.0 m bgl)	
LE_MW08	7.0	Hydrocarbon odour during	0.0
		groundwater sampling	

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range, with the exception of pH being generally low across the majority of wells within this AEC. The lowest pH reading recorded was for LE\_MW02 (pH 3.42).

Hydrocarbon odour was noted during the sampling of several wells within this AEC (LE\_MW03, LE\_MW04, LE\_MW05, LE\_MW06, LE\_MW07 and LE\_MW08); however no sheen or NAPL was observed. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

#### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of hydrocarbons including TRH fractions, BTEX, PAHs and phenols were detected in a number of soil samples collected from within this AEC. All concentrations were below adopted screening values with the exception of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in a number of samples, which exceeded the adopted ESLs.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

## Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of various COPCs were above the laboratory LOR in a number of groundwater samples collected from within this AEC. These included concentrations of dissolved phase hydrocarbons detected in five groundwater monitoring wells sampled from within this AEC. These concentrations were below the adopted screening values, with the exception of benzene in LE\_MW04, LE\_MW07 and LE\_MW08 and naphthalene in LE\_MW07, which exceeded the adopted human health and/or ecological screening values.

Metals in excess of laboratory LORs were detected in all monitoring wells across this AEC. Arsenic, cadmium, copper, lead, manganese, nickel, selenium and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

## Discussion

Soil samples collected from a number of locations within this AEC were reported with concentrations of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in excess of adopted ESLs. All concentrations, however, were below adopted human health screening values. As this area is predominantly covered in hard standing or compacted gravel, with the exception of some minor grassed areas, the ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the ESLs is therefore considered to be overly conservative.

Groundwater collected from three monitoring wells within this AEC contained concentrations of benzene that exceeded the adopted human health screening values. At LE\_MW07 and LE\_MW08 these concentrations exceeded the human health (drinking water) screening values. The concentration of benzene at LE\_MW07 also exceeded recreational screening values. At this well the concentration of naphthalene detected also exceeded the adopted ecological screening values.

All groundwater samples collected from monitoring wells within this AEC contained concentrations of metals greater than adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, lead, nickel, selenium and zinc. Concentrations of arsenic, cadmium, lead, nickel and selenium in excess of adopted human health (drinking water and/or recreational) screening values were also reported in a number of wells.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

Based on the concentrations of hydrocarbons observed in groundwater and the distance of approximately 50 metres to Lake Liddell's nearest point, it is possible that migration of contaminants from this area to Lake Liddell may result in a potential risk to ecological and human (recreational) users of the lake. Further assessment may therefore be required.

# 5.3.6 Area LF – Bulk Fuel Storage – Waste Oil AST (Transformer Road) and Former Transformer Oil ASTs

## Background

The waste oil AST is understood to be fed by a drainage system that collects waste oil from the turbine units. Information provided by Macquarie Generation personnel during the previous site visit indicated that the tank and associated bund was overfilled in 2012 with oil lost to the ground surface, reaching the drainage network, and flowing to the oil and grit trap. It is likely that some of the released oil reached ground beneath the area. It is unclear if other release events have occurred from this potential contamination source historically.

Given the absence of previous environmental characterisation work, and based on the history of oil storage and the known release event, further investigation was considered to be required to investigate potential contamination in this area.

## AEC Investigation Methodology and Field Observations

A total of five soil investigation bores were installed within this AEC. No groundwater was encountered during drilling and no groundwater monitoring wells were installed. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile.

Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in Table 5.7.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LF_SB01	0.5	None	0
LF_SB02	0.6	None	-
LF_SB03	0.3	None	0
LF_SB04	0.6	None	0
LF_MW01	10.0	None	0

Table 5.7Field Observations Summary - AEC LF

## Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

The majority of measured concentrations of COPCs were below or close to the corresponding laboratory LOR in all samples collected from within this AEC. TRH fractions were detected in soil collected from LF\_SB01 at a depth of 0.1 m bgl. These concentrations did not exceed adopted screening values with the exception of TRH  $C_{16}$ - $C_{34}$ , which exceeded the ESL.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in all soil samples collected from within this AEC; however all metals concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

# Groundwater Analytical Results

No groundwater samples were collected from within this AEC.

## Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC with the exception of TRH  $C_{16}$ - $C_{34}$  in soil collected from 0.1 m bgl at LF\_SB01, which exceeded the adopted ESL. As this area is covered in hard standing, the ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the ESLs is conservative.

## 5.3.7 Area LG – Bulk Fuel Storage – Turbine Oil AST

## Background

The bulk fuel storage area is situated north of the Main Power Block within a concrete block bund. Pipework inside the bund beneath the fill point showed staining, suggesting periodic leaks are likely to have occurred. Drains are located immediately outside the bund. Soil and groundwater in this area has not previously been investigated and further investigation was considered to be required to assess potential contamination

## AEC Investigation Methodology and Field Observations

A total of three soil investigation bores, all of which were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were observed within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.4 ppm v (isobutylene equivalent) in the soil samples collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.8*.

Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
	Evidence	
6.0	None	0.0
8.0	H <sub>2</sub> S odour during	0.0
	groundwater sampling	
8.0	H <sub>2</sub> S odour during	0.4
	groundwater sampling	
	Depth (m bgl) 6.0 8.0 8.0	Depth (m bgl) Visual or Olfactory Evidence   6.0 None   8.0 H <sub>2</sub> S odour during groundwater sampling   8.0 H <sub>2</sub> S odour during groundwater sampling

## Table 5.8Field Observations Summary - AEC LG

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A hydrogen sulfide odour was observed at LG\_MW02 and LG\_MW03. A summary of field observations from the groundwater sampling works are presented within Table 3 of Annex B.

#### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC however all concentrations were below the adopted screening values.

Samples for asbestos analysis were not collected within this AEC; however no suspected asbestos materials were observed during drilling.

## Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Arsenic, copper, lead, and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

## Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

All monitoring wells within this AEC reported metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included copper, lead, and zinc. Concentrations of arsenic and lead in excess of the adopted human health (drinking water) screening values were also detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself.

The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

## 5.3.8 Area LH – Bulk Fuel Storage – Waste Oil ASTs (Liquid Alternative Fuels) and Emergency Generator AST

#### Background

Three 55 000 L tanks containing waste oil are located on the south-east portion of the power block. While appearing in visually good condition, several inbund sumps were observed to contain oil, indicating that there may have been releases from the primary storage units.

Given the absence of previous environmental characterisation work, and based on the history of fuel/oil storage and likelihood of release, further investigation was considered to be required to assess potential contamination.

## AEC Investigation Methodology and Field Observations

A total of four soil investigation bores, of which three were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation, were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.0 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in Table 5.9.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LH_SB01	2.0	None	-
LH_MW01	8.0	None	0.0
LH_MW02	8.0	None	0.0
LH_MW03	8.0	None	0.0

#### Table 5.9Field Observations Summary - AEC LH

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC. No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Samples for asbestos analysis were not collected within this AEC; however no suspected asbestos was observed during drilling.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Cadmium, copper, nickel, and zinc were detected at concentrations in excess of the adopted ecological screening values in groundwater samples collected from the wells within this AEC.

## Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

Groundwater samples collected from all monitoring wells within this AEC were reported with dissolved metals concentrations greater than the adopted ecological screening values.

Metals exceeding the adopted ecological screening values included copper, lead, and zinc. Concentrations of metals were below the adopted human health (drinking water and recreational) screening values.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.9 Area LI – Current and Former Coal Storage Area

# Background

This area is defined as the current Coal Stockpile and former Coal Stockpile which extended further south along the shores of Lake Liddell. The primary concern in the current Coal Stockpile is the potential transport of coal fines via surface water run-off into drainage channels and ultimately into Lake Liddell.

It is recognised that the coal conveyor system and associated sediment ponds may represent an AEC (related to mechanical operations (oils) and coal fines that may migration to Lake Liddell), however these have not been considered to warrant targeted environmental investigation. It is considered unlikely that coal conveyors would represent a significant contamination issue in the context of the site-wide assessment; however, based on the lack of investigation data for this AEC, further investigation was considered to be required to provide a baseline for soil and groundwater conditions in this area.

## AEC Investigation Methodology and Field Observations

A total of fourteen soil investigation bores, of which nine were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.8 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.10*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
	_	Evidence	-
LI_SB01	3.0	None	0.1 - 0.5
LI_SB02	1.6	None	0.0 - 0.1
LI_SB03	10.0	None	0.0
LI_SB04	1.4	None	0.0 - 0.1
LI_SB05	3.1	None	0.0 - 0.1
LI_MW01	10.0	None	0.0
LI_MW02	10.0	None	0.0 - 0.2
LI_MW03	6.0	None	0.0 - 0.6
LI_MW04	6.0	None	0.0 - 0.8
LI_MW05			
LI_MW06	8.0	None	0.0
LI_MW07	8.0	Hydrogen sulfide odour	0.0 - 0.3
_		during groundwater	
		sampling	
LI_MW08	10.0	None	0.0
LI_MW09	8.5	None	0.0 - 0.2

Table 5.10Field Observations Summary - AEC LI

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC, with the exception of low pH at the majority of wells. The lowest pH reading was recorded at LI\_MW04 (pH 4.00). No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC, with the exception of a hydrogen sulfide odour at LI\_MW07. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

#### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in the soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

## Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Arsenic, boron, cadmium, copper, lead, manganese, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

#### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

Samples collected from all monitoring wells within this AEC reported metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included boron, cadmium, copper, lead, manganese, nickel and zinc. Concentrations of arsenic and nickel in excess of the adopted human health (drinking water and/or recreational) screening values were also detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

## 5.3.10 Area LJ – Dangerous Goods, Flammable Liquids and Stores

## Background

These areas have been treated as a single aggregated source area based upon an understood commonality of location and type of potential contamination sources on the northern boundary of the Main Power Block area.

The eastern end of this AEC contains the flammable liquids store. This contains small quantities of ethanol, acetone, methyl ethyl ketone, xylenes and petrol in a locked storage shed. It is unclear what other products have historically been stored in this area, including upon the open ground that surrounds the store.

The western end of this area contains Stores Compounds No.1, No. 2 and No.3, which were observed to be concrete sealed during the previous site visit. Stores Compound No.1 and No.2 were observed to contain little by way of COPCs, being mostly parts storage areas at the time of the site visit. Store Compound No.3, however, contained drum storage and disused transformers (which may contain oils). Observed chemical storage included the following (with typical volumes).

- hypochlorite solution: 2000 L
- hydrazine hydrate: 4000 L
- acrylic acid: 1500 L
- ammonia solution: 4000 L
- tetrachloroethene (PCE): 2000 L
- chlorophenols: 800 L
- potassium bromate: 125 L

Given the absence of previous environmental characterisation work, and the current and historic storage of a variety of COPCs, further investigation was considered to be required to assess potential contamination in this area.

## AEC Investigation Methodology and Field Observations

A total of fourteen soil investigation bores, of which four were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. Hydrocarbon odours were observed at LJ\_SB02 between 0.3 and 2.5 m bgl and at LJ\_MW02 between 1.5 and 3.5 m bgl. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 37.8 ppm v (isobutylene equivalent) in any soil samples collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.11*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
	-	Evidence	-
LJ_SB02	3.3	Hydrocarbon odour from	0.0 - 37.8
		0.3 - 2.5	
LJ_SB03	3.3	None	0.0
LI_SB04	2.1	None	0.0
LJ_SB06	1.55	None	0.0
LJ_SB07	0.85	None	0.0 - 0.1
LJ_SB08	1.2	None	0.0
LJ_SB09	1.3	None	0.0
LJ_SB10	1.2	None	0.0
LJ_SB11	3.0	None	0.0
LJ_SB12	0.0	None	0.0
LJ_MW01	5.0	Hydrogen sulfide odour	0.0
		during groundwater	
		sampling	
LJ_MW02	4.35	Hydrocarbon odour from	0.1 - 27.4
		1.5 - 3.5	
LJ_MW03	0.35	None	0.0
LI_MW04	10.0	None	0.0 - 0.1

Table 5.11Field Observations Summary - AEC LJ

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC, with the exception of a hydrogen sulfide odour at LJ\_MW01. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

#### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

The majority of measured concentrations of COPCs were below or close to the corresponding laboratory LOR in all samples collected from within this AEC. TRH fractions were detected in a number of soil samples collected from LJ\_MW02 and LJ\_SB02. These concentrations did not exceed adopted screening values with the exception of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in soil collected from LJ\_SB02, which exceeded the adopted ESLs.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in all soil samples collected from within this AEC however all metals concentrations were below the adopted screening values.
Asbestos was not detected in soils sampled within this AEC with the exception of a detection of potential ACM in the sample collected from LJ\_MW02 at 0.5 m (unidentified asbestiform mineral fibres).. The asbestos quantification result for this sample was reported above the human health screening criteria.

### Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. TRH fractions above the laboratory LOR were detected in groundwater collected from LJ\_MW02. These concentrations were below adopted screening values.

Concentrations of metals above the laboratory LOR were also detected in all groundwater samples. Cadmium, copper, lead, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

#### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC with the exception of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in soil collected from LJ\_SB02, which exceeded the adopted ESLs, and a detection of potential ACM at LJ\_MW02. As this area is predominantly covered in hard standing or compacted gravel, the ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the ESLs are conservative. The potential ACM detection was isolated and, given that concrete hard standing covers this location, it is not considered that this represents a potential risk to human health so long as the hard standing is not removed and excavation is not undertaken without appropriate controls in place.

All monitoring wells within this AEC contained concentrations of metals greater than adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, lead, nickel and zinc. Concentrations of lead and nickel in excess of adopted human health (drinking water and/or recreational) screening values were detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.11 Area LK – Former Construction Workshop and Storage

# Background

Information provided by Macquarie Generation personnel during the previous site visit indicated that a workshop area, storage yard, vehicle parking and administration offices were established to the north west of the Power Block area, immediately west of the Water Intake and Pump Station during construction of the Liddell Power Station. Limited details were available on the exact nature of operations or materials stored here during the construction period; however it is possible that there may have been temporary storage of potentially contaminating materials.

Given the absence of previous environmental characterisation work at this location, further investigation was considered to be required to assess the potential for contamination to be present.

# AEC Investigation Methodology and Field Observations

A total of five soil investigation bores were installed within this AEC. Groundwater was not encountered during drilling and no groundwater monitoring wells were installed. Soil bores were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.6 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.12*.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LK_SB01	3.0	None	0.0
LK_SB02	3.0	None	0.0 - 0.6
LK_MW01	14.0	None	0.0 - 0.2
LK_MW02	14.0	None	0.0 - 0.6
LK_MW03	12.0	None	0.0 - 0.2

### Table 5.12Field Observations Summary - AEC LK

#### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

# Groundwater Analytical Results

No groundwater samples were collected from this AEC as groundwater was not encountered during drilling.

#### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC and groundwater was not encountered during the investigation.

# 5.3.12 Area LL – Hunter Valley Gas Turbines

#### Background

The HVGT provides black start capability to the Power Station, with potential contamination sources including bulk fuel (diesel) storage and fuels and oils associated with turbine and transformer activity. Numerous hydrocarbon releases have been documented in the past, including a 30 000L release in 1990 which resulted in migration of contaminants to a nearby tributary of Lake Liddell.

It is understood some remedial works were completed around the time of the incident but no information was available for review. Significant surface staining was observed around the turbines and fuel storage area, including upon areas of open ground or concrete of poor integrity. It was also observed that the drainage network and bund arrangement within the facility is poorly maintained with potential for direct release to underlying soil.

It is understood that the HVGT drainage system has previously been through a cleaning, inspection and upgrade process. Interceptors installed at the down gradient boundary of the facility also showed evidence of leakages, indicating interceptors may have been overtopped.

Given the limited availability of documentation regarding previous environmental characterisation or remediation works, the historical use of the facility including the storage of fuels and hydrocarbons, the known release events and visual evidence of staining and concrete/bund integrity, further investigation was considered to be required to assess potential contamination issues in this area.

#### AEC Investigation Methodology and Field Observations

A total of twenty-three soil investigation bores, of which nine were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

Field indicators of contamination, including visible staining and sheens in drains, as described above, were noted within this AEC. No staining was detected through the sampled soil profile; however hydrocarbon odours were observed at LL\_SB10 at 0.4 m bgl, at LL\_MW01 during well installation and at LL\_MW09 from 3.0 to 20.0 m bgl. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 25.5 ppm v (isobutylene equivalent) in the soil samples collected from this AEC.

Field observations during the drilling works are summarised in Table 5.13.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence	
LL_SB01	3.2	None	0.0
LL_SB02	0.85	None	0.0
LL_SB03	1.6	None	0.0
LL_SB07	0.7	None	0.0
LL_SB08	0.65	None	0.0
LL_SB09	1.8	None	0.0 - 0.1
LL_SB10	2.0	Hydrocarbon odour at 0.4 m	0.0 - 0.1
LL_SB11	2.2	None	0.0
LL_SB12	2.2	None	0.0 - 0.1
LL_SB13	1.9	None	0.0
LL_SB14	1.4	None	0.0 - 0.1
LL_SB15	2.5	None	0.0 - 0.1

#### Table 5.13Field Observations Summary - AEC LL

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
	-	Evidence	-
LL_SB17	1.3	None	0.0
LL_SB18	3.2	None	0.2 - 0.3
LL_MW01	10.0	Very faint hydrocarbon	0.2 - 0.6
		odour during well install	
LL_MW02	20.0	None	0.0 - 5.5
LL_MW03	20.0	None	0.0 - 9.2
LL_MW04	20.0	None	0.0
LL_MW05	15.0	None	0.0 - 0.7
LL_MW06	11.0	None	0.2 - 0.5
LL_MW07	11.5	None	0.0
LL_MW08	20.0	None	0.2 - 0.4
LL_MW09	11.0	Faint hydrocarbon odour	0.0 - 25.5
		from 3.0 to 20.0 m	

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range, with the exception of electrical conductivity recorded at LL\_MW02 (114 300  $\mu$ S/cm). Although groundwater in surrounding wells was observed to be saline during sampling, the electrical conductivity reading at this well is indicative of extremely saline conditions and is considered to be potentially inaccurate. No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. An organic odour was observed at LL\_MW03, which was not considered indicative of potential contamination. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

The majority of measured concentrations of COPCs were below or close to the corresponding laboratory LOR in all samples collected from within this AEC. Hydrocarbons, including TRH fractions, PAHs and phenols, were detected in a number of soil samples collected from this AEC. These concentrations did not exceed adopted screening values with the exception of TRH  $C_{16}$ - $C_{34}$  in soil collected from LL\_SB07 (0.1 m bgl) and benzo(a)pyrene in soil collected from LL\_MW03 (1.9 m bgl) and LL\_MW09 (4.0 m bgl), which exceeded the adopted ESLs.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in all soil samples collected from within this AEC; however all metals concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

### Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. Dissolved phase hydrocarbons above laboratory LORs were detected in groundwater collected from LL\_MW02 and LL\_MW03. These concentrations were below adopted screening values with the exception of benzene, which exceeded the adopted human health (drinking water) screening values at both of these locations. No hydrocarbon results in groundwater exceeded the adopted ecological screening values.

Concentrations of metals above the laboratory LOR were also detected in all groundwater samples. Arsenic, cadmium, copper, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC with the exception of TRH  $C_{16}$ - $C_{34}$  and benzo(a)pyrene in a number of soil samples, which exceeded the adopted ESLs. As these boreholes are located in areas covered in concrete hard standing or compacted gravel (roadway), the ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the ESLs are considered to be conservative.

Groundwater samples collected from two monitoring wells within this AEC were reported with concentrations of benzene that exceeded the adopted human health (drinking water) screening values.

All monitoring wells within this AEC contained metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, nickel and zinc. Concentrations of arsenic and nickel in excess of adopted human health (drinking water) screening values were detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself.

The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

### 5.3.13 Area LM – Machinery Graveyard

### Background

The Machinery Graveyard is located to the south of the exit road to the gatehouse (and north of the Coal Reclaimer Bays) and is used for the storage of redundant machinery and scrap. The area is unpaved and due to the potential for disused machinery to contain residual oils or chemicals which have the potential to seep/leak to ground or asbestos, it has been considered an AEC.

Given the absence of previous environmental characterisation work at this location, further investigation was considered warranted to provide a baseline for this area and to assess potential issues associated with soil and groundwater contamination.

# AEC Investigation Methodology and Field Observations

A total of four soil investigation bores, of which two were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.1 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in Table 5.14.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LM_SB01	1.7	None	0 - 0.1
LM_MW01	9.0	None	0 - 0.1
LM_MW02	10.0	None	0
LM_MW03	11.4	None	0

# Table 5.14Field Observations Summary - AEC LM

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC, with electrical conductivity readings indicating saline groundwater. No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Samples for asbestos analysis were not collected within this AEC; however no suspected asbestos was observed during drilling.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Cadmium, copper, lead, nickel, selenium and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

# Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

Samples collected from all monitoring wells within this AEC were reported with metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included boron, cadmium, copper, lead, nickel, selenium and zinc. Concentrations of lead and nickel in excess of the adopted human health (drinking water) screening values were also detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

### 5.3.14 Area LN- Oil and Grit Trap

#### Background

The Oil and Grit Trap, located adjacent to the shoreline of Lake Liddell, receives the majority of drainage from the Site. The Oil and Grit Trap receives potentially contaminated waters from across the operational area of the site, including the Power Generating Units. Numerous historical spills have been reported to have direct impacts to the Oil and Grit Trap, including the transport and collection of significant amounts of fuels, oils, ash and coal. The associated oil water separator and sump may also have experienced overtopping during its operations. Verbal information supplied by Macquarie Generation indicated that the intention of the system was to act as a sedimentation pond, not a contaminated water treatment system.

Given the absence of previous environmental characterisation work, the uncertainty associated with the volume of potential contaminants received during its operation and the potential for seepage from the system, further investigation was considered to be required to assess potential contamination within this area.

# AEC Investigation Methodology and Field Observations

A total of seven soil investigation bores, of which six were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC.

No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.7 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in Table 5.15.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence	
LN_MW01	10.0	None	0.0 - 0.1
LN_MW02	8.5	None	0.0
LN_MW03	1.5	None	0.0
LN_MW04	4.0	None	0.0 - 0.2
LN_MW05	10.5	None	0.0 - 0.2
LN_MW06	10.2	None	0.0 - 0.3
LN_MW07	8.0	None	0.0 - 0.7

Table 5.15Field Observations Summary - AEC LN

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC, with electrical conductivity readings indicating saline groundwater.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

### Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Cadmium, copper, nickel, and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

All monitoring wells within this AEC reported metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, nickel, and zinc. The concentration of nickel in groundwater collected from LN\_MW01 also exceeded the adopted human health (drinking water) screening values.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.15 Area LO – Former and Current Maintenance Stores, Workshops, Foam Generator and Unofficial Lay-Down Areas

# Background

Various workshops are located around the site. During ERM's previous site visit, these workshops were found to contain small scale chemical storage, with generally good housekeeping practices in place, and were not considered to pose a significant risk of soil and groundwater contamination. The External Plant Workshop located to the south of the Power Block was found to contain comparatively larger scale storage (approximately twenty 205 L drums of oil) and had a vehicle wash down bay and oil/water interceptor.

In addition to the maintenance areas, a foam generator used for fire suppression purposes (no information was available on whether fire training may have historically been undertaken on the site) and an unofficial (and unsealed) laydown area adjacent to the northern stack were identified as potential AECs for the site, and based on their proximity to the Main and Apprentice Workshops have been grouped together for assessment purposes.

Given the absence of previous environmental characterisation work, and the uncertainty around previous practices and potential storage of solvents (including chlorinated solvents), the workshops, foam generator and laydown area have been aggregated into an AEC for investigation to assess potential contamination in these areas.

#### AEC Investigation Methodology and Field Observations

A total of twenty five soil investigation bores, of which fourteen were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted at the surface within this AEC. Staining was observed at LO\_SB05 at a depth of 0.2-0.3 m bgl. Hydrocarbon odours were detected at LO\_SB05, LO\_MW04, LO\_MW05 and LO\_MW06 at depths of 0.2-0.3 m bgl, 3.5 m bgl, 2.5 m bgl and 4.0 m bgl, respectively. Measured concentrations of ionisable volatile compounds via headspace analysis were identified up to a maximum of 79.2 ppm v (isobutylene equivalent) in soil samples collected from this AEC.

A summary of field observations from the drilling works is presented within *Table 5.16*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence	
LO_SB01	1.3	None	0.0
LO_SB02	2.4	None	0.0
LO_SB03	3.5	None	0.0 - 2.3
LO_SB04	3.5	None	0.0 - 2.7
LO_SB05	1.9	Hydrocarbon odour and	0.0 - 13.4
		staining from 0.2 – 0.3 m bgl	
LO_SB06	3.2	None	0.0 - 0.1
LO_SB06A	0.6	None	0.0
LO_SB07	3.2	None	0.0 - 0.4
LO_SB08	3.9	None	0.0 - 0.2
LO_SB09	3.2	None	0.2 - 0.6
LO_MW01	10.0	None	0.0
LO_MW02	6.0	Hydrocarbon odour during	0.0 - 2.0
		groundwater sampling	

#### Table 5.16Field Observations Summary - AEC LO

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence	
LO_MW03	5.0	Hydrocarbon odour during	0.0 - 1.4
		groundwater sampling	
LO_MW04	5.0	Hydrocarbon odour at 3.5m	0.0 - 38.9
LO_MW05	6.0	Hydrocarbon odour during	0.0 - 77.7
		groundwater sampling	
LO_MW06	7.0	Hydrocarbon odour during	0.0 - 79.2
		groundwater sampling	
LO_MW08	10.0	None	0.0 - 0.4
LO_MW10	6.0	None	0.0
LO_MW11	5.0	None	2.3
LO_MW12	5.0	None	0.0
LO_MW13	9.0	None	0.0
LO_MW14	14.0	None	0.0
LO_MW15	9.0	None	0.0 - 0.5
LO_MW16	10.0	None	0.0 - 0.1
LO_MW17	6.0	None	0.6 - 1.1

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range. The exception to this was for pH at LO\_MW10 (pH 4.2). Electrical conductivity readings indicated saline groundwater.

Hydrocarbon odours were observed during purging and sampling at LO\_MW02, LO\_MW03, LO\_MW05 and LO\_MW06. No NAPL was observed, but a potential sheen was observed at LO\_MW05 and LO\_MW06. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC with the exception of the sample collected from LO\_SB08 at 04.-0.5 m bgl. Laboratory analysis identified chrysotile asbestos in this sample. The asbestos quantification result for this sample was reported above the human health screening criteria.

### Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. Dissolved phase hydrocarbons above laboratory LORs were detected in groundwater collected from a number of samples. These concentrations were below adopted screening values with the exception of benzene in groundwater collected from LO\_MW05, which exceeded the adopted human health (drinking water and recreational) screening values and naphthalene in groundwater collected from LO\_MW05 and LO\_MW06, which exceeded the adopted ecological screening values. Chlorinated hydrocarbons were also detected in groundwater samples collected from LO\_MW03 and LO\_MW04. This included concentrations of tetrachloroethene in excess of the adopted human health (drinking water) screening values at both locations.

Concentrations of metals above the laboratory LOR were also detected in all groundwater samples. Arsenic, cadmium, copper, lead, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC, with the exception of identification of chrysotile asbestos at one location (LO\_SB08) at 0.4-0.5 m bgl. The detection of asbestos was isolated and, given that concrete hard standing covers this location, it is not considered that this represents a potential risk to human health so long as the hard standing is not removed and excavation is not undertaken without appropriate controls in place.

Dissolved phase hydrocarbons were detected in excess of adopted screening values within groundwater collected from two locations within this AEC. The concentration of benzene in groundwater collected from LO\_MW05 exceeded the adopted human health (drinking water and recreational) screening values but was below the adopted ecological screening values.

The concentration of naphthalene detected in groundwater collected from LO\_MW05 and LO\_MW06 exceeded the adopted ecological screening values but did not exceed adopted human health screening values. The concentration of tetrachloroethene detected in groundwater collected from LO\_MW03 and LO\_MW04 exceeded the adopted human health (drinking water) screening values.

Based on the concentrations of hydrocarbons observed in groundwater and the distance of approximately 180 metres to Lake Liddell's nearest point, it is possible that migration of contaminants from this area to Lake Liddell may result in potential risks to ecological receptors and human (recreational) users of the lake. Further assessment may be required.

All monitoring wells within this AEC reported metals concentrations greater than the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, lead, nickel, and zinc. Concentrations of arsenic, lead and nickel in excess of the adopted human health (drinking water and/or recreational) screening values were also detected in a number of samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.16 Area LP – Fill Material (Site Levelling and Shoreline Expansion)

### Background

Interviews with site personnel revealed that the shoreline to the east of the Power Station has been extended over time through the placement of fill material. It is understood that the fill materials used as part of this process include the material 'cut' during development of the Power Plant itself, other virgin excavated material from across the site, waste stream materials such as coal fines, ash and material dredged from the oil and grit trap, and other station rubbish material. Anecdotal evidence exists with respect to possible placement locations, but no formal records are known to have been kept.

Given the absence of previous environmental characterisation work, limited records or tracking of waste disposal practices associated with the shoreline expansion, and the uncertainty associated with the content of the fill material used, further investigation would be required to provide a baseline for this area and to assess potential material issues associated with soil and groundwater contamination and to assist with the identification and delineation of areas of infilling.

# AEC Investigation Methodology and Field Observations

A total of twenty soil investigation bores, of which six were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.6 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.17*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence	
LP_SB01	2.7	None	0.0 - 0.5
LP_SB02	2.6	None	0.0 - 0.2
LP_SB03	3.0	None	0.0 - 0.1
LP_SB04	3.2	None	0.0 - 0.6
LP_SB05	3.5	None	0.0
LP_SB06	1.9	None	0.0
LP_SB07	3.0	None	0.0 - 0.3
LP_SB08	3.0	None	0.0 - 0.4
LP_SB09	3.0	None	0.0 - 0.1
LP_SB10	3.0	None	0.0 - 0.1
LP_SB11	3.2	None	0.0 - 0.1
LP_SB12	3.2	None	0.0
LP_SB13	3.1	None	0.0
LP_SB14	2.8	None	0.0 - 0.1
LP_MW01	10.0	None	0.0 - 0.2
LP_MW02	7.0	None	0.0 - 0.4
LP_MW03	5.2	None	0.0 - 0.4
LP_MW04	4.0	None	0.0 - 0.3
LP_MW05	8.5	None	0.0 - 0.7
LP_MW06	4.0	None	0.0

Table 5.17Field Observations Summary - AEC LP

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range. The exception to this was for pH at LP\_MW02 (pH 4.41). Electrical conductivity readings indicated saline groundwater. No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. An organic odour was observed at LP\_MW04, which was not considered indicative of potential contamination. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

The majority of measured concentrations of COPCs were below or close to the corresponding laboratory LOR in all samples collected from within this AEC. Hydrocarbons were detected in a number of soil samples collected from within this AEC. These concentrations were below the adopted screening values with the exception of benzo(a)pyrene in soil collected from LP\_SB05 (0.1 m bgl) which exceeded the adopted ESL.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in all soil samples collected from within this AEC; however all metals concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC and naphthalene above the laboratory LOR (but below adopted screening values) in groundwater collected from LP\_MW03.

Arsenic, boron, cadmium, copper, lead, manganese, nickel, selenium and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

# Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC with the exception of benzo(a)pyrene in soil at one location (LP\_SB05, 0.1 m bgl), which exceeded the adopted ESL. As this location in located in an area covered by hardstand, the ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the ESLs are considered overly conservative.

All monitoring wells with the exception of LP\_MW02 and LP\_MW05 contained metals concentrations that exceeded the adopted ecological screening values. Metals exceeding the adopted ecological screening values included boron, cadmium, copper, lead, manganese, nickel, selenium and zinc. Concentrations of arsenic, cadmium, lead, nickel and selenium in excess of the adopted human health (drinking water and/or recreational) screening values were detected in a number of samples collected from within this AEC. There was no known source of the low pH reading recorded during groundwater sampling at LP\_MW02, which is located approximately 10 m from the Lake Liddell shoreline. Groundwater pH readings in other wells in the vicinity of LP\_MW02 did not indicate a widespread issue. Field measurement of pH in surface water from Lake Liddell in close proximity to this well indicated that pH was above 8. It is considered that the low pH recorded in groundwater at LP\_MW02 is not impacting Lake Liddell.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.17 Area LQ – Transformer Operations/ Transformer Road

# Background

Transformer Road, located immediately west of the main power block, contains two station transformers and four power unit transformers. The potential contamination source exists in the significant volumes (68 000 L) of transformer oil contained within each transformer, with several of the bunds surrounding the units observed to be stained and in poor condition.

Given the absence of previous environmental characterisation work, and based on the history of oil storage and evidence of historical releases, further investigation was considered to be required to assess potential contamination.

# AEC Investigation Methodology and Field Observations

A total of eighteen soil investigation bores, of which five were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 3.0 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.18*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence	
LQ_SB01	1.0	None	0.0
LQ_SB02	1.4	None	0.0
LQ_SB03	1.2	None	-
LQ_SB04	0.75	None	0.0
LQ_SB05	1.2	None	0.0
LQ_SB06	1.1	None	0.0
LQ_SB07	1.2	None	0.0
LQ_SB08	0.7	None	0.0
LQ_SB09	0.4	None	-
LQ_SB10	0.2	None	0.0
LQ_SB11	1.4	None	0.2
LQ_MW01	5.0	None	0.0
LQ_MW02	0.2	None	0.0
LQ_MW03	0.8	None	0.0
LQ_MW04	0.35	None	-
LQ_MW05	10.0	None	3.0
LQ_MW06	10.0	None	-
LQ_MW07	10.0	None	0.0

# Table 5.18Field Observations Summary - AEC LQ

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC. Electrical conductivity readings indicated saline groundwater.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A slight 'fish-like' odour was noted in several wells. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

The majority of measured concentrations of COPCs were below or close to the corresponding laboratory LOR in all samples collected from within this AEC. Hydrocarbons were detected in two soil samples (LQ\_SB01\_1.6 and LQ\_SB07\_1.0). These concentrations were below the adopted screening values with the exception of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in soil collected from LQ\_SB07 (1.0 m bgl) which exceeded the adopted ESLs.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in all soil samples collected from within this AEC however all metals concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Arsenic, cadmium, copper, lead, nickel, and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

# Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC with the exception of TRH  $C_{10}$ - $C_{16}$  and TRH  $C_{16}$ - $C_{34}$  in soil collected from LQ\_SB07 (1.0 m bgl) which exceeded the adopted ESLs. As this area is predominantly covered in concrete hard standing, the ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the ESLs is considered to be overly conservative.

All monitoring wells within this AEC contained metals concentrations that exceeded the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, lead, nickel, and zinc. Concentrations of arsenic and nickel in excess of the adopted human health (drinking water) screening values were detected in a number of samples collected from within this AEC.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.18 Area LR – Transgrid Switchyard

#### Background

The TransGrid Switchyard, although not owned by Macquarie Generation, is a potential AEC due to the storage/use of transformer oil which may have historically contained PCBs. Given the slope of the site there is potential for leaks from the switchyard to migrate toward the Main Power Block area as an offsite source.

Given the absence of previous environmental characterisation work and the potential for PCBs and hydrocarbons to be present, further investigation was considered to be required to assess potential contamination surrounding the switchyard (investigation was not proposed within TransGrid owned land due to access and safety issues).

# AEC Investigation Methodology and Field Observations

A total of three soil investigation bores, all of which were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the perimeter of the AEC on land owned by Macquarie Generation as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.7 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.19*.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LR_MW01	14.9	None	0.0
LR_MW03	10.0	None	0.2
LR_MW04	10.0	None	0.0 - 0.7

#### Table 5.19Field Observations Summary - AEC LR

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC. Electrical conductivity readings indicated saline groundwater.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A slight organic odour was observed at LR\_MW03, which was not considered indicative of potential contamination. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Samples for asbestos analysis were not collected within this AEC; however no suspected asbestos was observed during drilling.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Arsenic, cadmium, copper, nickel, and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

All monitoring wells within this AEC contained metals concentrations that exceeded the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, nickel, and zinc. Concentrations of arsenic and nickel were detected in excess of the adopted human health (drinking water) screening values in a number of samples collected from within this AEC.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.19 Area LS – Landfills (Waste Disposal and Burrow Pit)

# Background

Landfill areas include areas of station rubbish and asbestos landfilling to the south of the Main Power Block. Only limited information with respect to survey plans and content was available for review.

Given the absence of previous environmental characterisation work, and the absence of specific information on landfill content and scale, further investigation was considered to be required to assess potential contamination in this area, particularly any leachate that may be present from previously constructed cells.

# AEC Investigation Methodology and Field Observations

A total of six soil investigation bores, of which two were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.2 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.20*.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LS_SB01	3.2	None	0.0 - 0.1
LS_SB02	0.85	None	0.0 - 0.1
LS_SB03	2.9	None	0.0 - 0.1
LS_SB04	3.8	None	0.0 - 0.2
LS_MW01	4.0	None	0.0
LS_MW02	4.0	None	0.0

Table 5.20Field Observations Summary - AEC LS

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range, with the exception of low pH at LS\_MW01 (pH 4.64) and LS\_MW02 (pH 4.60). Electrical conductivity readings indicated saline groundwater.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A slight organic odour was observed at LR\_MW03, which was not considered indicative of potential contamination. A summary of field observations from the groundwater sampling works are presented within Table 3 of Annex B.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

The majority of measured concentrations of COPCs were below or close to the corresponding laboratory LOR in all samples collected from within this AEC.

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Measured concentrations of various heavy metals were above the corresponding laboratory LOR in all soil samples collected from within this AEC. All metals concentrations were below the adopted screening values with the exception of copper and zinc in soil collected from LS\_SB04 (2.7 m bgl) which exceeded the adopted EIL.

Asbestos was not detected in soils sampled within this AEC.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Arsenic, cadmium, copper, nickel, and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC with the exception of copper and zinc in soil collected from LS\_SB04 (2.7 m bgl), which exceeded the adopted site-specific EILs for these analytes. As this borehole was located on the side of an active roadway where the ground surface was primarily comprised of compacted gravel, the ecological value of the area for growth of terrestrial flora is considered to be low. This sample was also collected from >2 m bgl and hence was outside the primary root zone and therefore the application of the EILs are considered to be overly conservative.

All monitoring wells within this AEC contained metals concentrations that exceeded the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper and nickel. Concentrations of arsenic, cadmium and nickel in excess of the adopted human health (drinking water and/or recreational) screening values were detected in a number of samples collected from within this AEC.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.20 Area LT – Water Intake and Pump Stations

# Background

This AEC, located immediately adjacent to Lake Liddell, contains two transformers (A and B) which show some evidence of surface staining from oil discharge/release. The area also contains a disused chlorination plant formerly used to add chlorine to the cooling water to prevent fouling.

Given the absence of previous environmental characterisation work, further investigation would be required to provide a baseline for this area and to assess potential material issues associated with soil and groundwater contamination, particularly given its proximity to Lake Liddell.

# AEC Investigation Methodology and Field Observations

A total of four soil investigation bores, all of which were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC, with the exception of possible fibre cement fragments observed during drilling at LT\_MW01 at depths between 0.1 and 0.6 m bgl. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.6 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.21*.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LT_MW01	7.3	Possible fibre cement fragment	0.1
LT_MW02	8.0	None	0.1
LT_MW03	7.4	None	0.1
LT_MW04	5.0	None	0.6

Table 5.21Field Observations Summary - AEC LT

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC. Electrical conductivity readings indicated saline groundwater. Hydrocarbon odour was observed during purging and sampling at LT\_MW02, LT\_MW03 and LT\_MW04. No sheen or NAPL was observed.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. Dissolved phase hydrocarbons above laboratory LORs were detected in groundwater collected from LT\_MW02 and LT\_MW04. These concentrations were below adopted screening values with the exception of benzene in groundwater collected from LT\_MW04 which exceeded the adopted human health (drinking water) screening values.

Concentrations of metals above the laboratory LOR were also detected in all groundwater samples. Boron, cadmium, manganese, nickel and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

# Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC. The possible asbestos cement fragments observed between depths of 0.1 and 0.6 m bgl during drilling at LT\_MW01 did not result in detection of asbestos fibres by the laboratory. As such, it is considered that the fragments observed within fill material at this location are not likely to be ACM and do not warrant further consideration.

Concentrations of metals in excess of the adopted ecological screening values were detected in groundwater sampled from two of the four groundwater monitoring wells located within this AEC (LT\_MW02 and LT\_MW03). Metals exceeding the adopted ecological screening values included boron, cadmium, manganese, nickel and zinc. Concentrations of cadmium and nickel also exceeded the human health (drinking water or recreational) screening values.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.21 Area LU – Water Treatment Plant

# Background

This AEC comprises two adjacent areas which are at separate elevations. The demineralisation plan is sited within the south western corner of the Main Power Block, which is cut into the bedrock. The Water Treatment Plant is located on the original ground surface level above the cutting and is approximately 8-10 m higher.

Potential contamination sources include the two bulk ferric chloride ASTs which are located inside a Plant Room, although they sit within a bund at the same level as the Demineralisation Plant. The fill point is located on the road at the Water Treatment Plant Elevation and shows signs of spillage. There is also staining evident down slope to the south along the road which leads towards the Outfall Canal.

The Demineralisation Plant contains a number of bulk chemical ASTs. These are bunded; however external pipework and drains run through the area. A number of the drains which carry process water show signs of extensive corrosion due to the nature of the acids and alkalis they transport. There is potential for leakages to have occurred along these lines before their ultimate discharge point known as the 'water treatment plant discharge' which is direct to Lake Liddell.

Given the absence of previous environmental characterisation work, and based on the history of chemical storage and potential for releases having occurred, further investigation was considered to be required to assess possible contamination in this area.

### AEC Investigation Methodology and Field Observations

A total of seven soil investigation bores, of which two were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.22*.

Borehole ID	Depth (m bgl)	Visual or Olfactory Evidence	PID Range (ppm)
LU_SB01	0.4	None	0.0
LU_SB02	0.7	None	0.0
LU_SB03	1.5	None	-
LU_SB04	0.7	None	0.0
LU_MW01	3.2	None	0.0
LU_MW02	12.0	None	0.0
LU_MW03	13.0	None	0.0

# Table 5.22Field Observations Summary - AEC LU

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC. Electrical conductivity readings indicated saline groundwater.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

### Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC; however all concentrations were below the adopted screening values.

Samples for asbestos analysis were not collected within this AEC; however no suspected asbestos was observed during drilling.

### Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Copper, nickel, and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

# Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

Both monitoring wells within this AEC contained metals concentrations that exceeded the adopted ecological screening values. Metals exceeding the adopted ecological screening values included copper, nickel, and zinc. Nickel in excess of the adopted human health (drinking water) screening values was also detected in groundwater collected from LU\_MW02.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.3.22 Area LV – Buffer Land

#### Background

The buffer lands define the extant boundary areas of the Site and were defined as a potential AEC to establish boundary conditions at the Site. The topography of the buffer lands is highly variable, as is the adjacent land use. Whist the layout of the surrounding buffer lands owned by Macquarie Generation has stayed largely consistent since the time of plant commissioning in the early 1970s, activities on neighbouring properties have changed considerably, including open cut coal mining operations located primarily to the east of Lake Liddell and to the west of the Liddell ash dam. The extreme eastern portion of Drayton Mine is located within the Liddell buffer lands. Whilst a portion of Drayton Mine is located on Macquarie Generation property, it was not considered further as a significant contamination source requiring investigation due to the expected depth of groundwater in this area (>80m bgl) and the known deeper regional water quality issues in the Upper Hunter Valley associated with coal mining operations.

The majority of the buffer land area has no infrastructure present (with the exception of Drayton mine, located directly west of the Liddell ash dam) and consists of relatively undisturbed vegetated areas. No significant contamination sources were identified within AEC LV; however investigations within this area provides information to fill material data gaps within the CSM and to provide background data for the Site conditions.

#### AEC Investigation Methodology and Field Observations

A total of seven soil investigation bores, of which three were completed as groundwater monitoring wells, were installed within this AEC. Soil bores and monitoring wells were distributed around the AEC as presented in *Annex A*. Relevant borehole logs are presented within *Annex D*.

No field indicators of contamination, such as staining, odours or visibly stressed vegetation were noted within this AEC. No staining or unusual odours were detected through the sampled soil profile. Measured concentrations of ionisable volatile compounds via headspace analysis did not exceed 0.6 ppm v (isobutylene equivalent) in any soil sample collected from this AEC.

Field observations during the drilling works are summarised in *Table 5.23*.

Borehole ID	Depth (m bgl)	Visual or Olfactory	PID Range (ppm)
		Evidence	
LV_MW01	10.0	None	0.0 - 0.1
LV_MW02	15.0	None	0.0 - 0.3
LV_MW03	8.0	None	0.1 - 0.3
LV_MW04	10.3	None	0.0 - 0.2
LV_MW05	5.6	None	0.1 - 0.6
LV_MW06	10.0	None	0.0
LV_MW07	15.0	None	0.0 - 0.1

### Table 5.23Field Observations Summary - AEC LV

Groundwater field parameter readings collected during the groundwater sampling works are presented in *Table 3* of *Annex B*. Field parameters were generally within the expected range in this AEC. Electrical conductivity readings indicated saline groundwater.

No indications of contamination, such as sheen or odours, were observed during groundwater sampling within this AEC. A summary of field observations from the groundwater sampling works are presented within *Table 3* of *Annex B*.

# Soil Analytical Results

The soil analytical results are compared to the adopted human health and ecological screening values as presented in *Annex B*.

Measured concentrations of COPCs were below the adopted screening values in all soil samples collected from within this AEC. The majority of measured concentrations were below or close to the corresponding laboratory LOR.

Measured concentrations of various heavy metals were above the corresponding laboratory LOR in a number of soil samples collected from within this AEC however all concentrations were below the adopted screening values.

Asbestos was not detected in soils sampled within this AEC.

# Groundwater Analytical Results

Groundwater analytical results compared to the adopted screening values are presented in *Annex B*. Exceedences of the adopted screening values are also graphically presented in *Annex A*.

Measured concentrations of the majority of COPCs were below the laboratory LOR in all groundwater samples collected from within this AEC. The exceptions to this were detections of some metals within groundwater across this AEC.

Cadmium, copper, lead, nickel, and zinc were detected at concentrations in excess of the adopted human health and/or ecological screening values in groundwater samples collected from the wells within this AEC.

### Discussion

No exceedences of the adopted ecological or human health screening values were identified in soil samples collected from within this AEC.

Samples collected from all monitoring wells within this AEC were reported with metals concentrations which exceeded the adopted ecological screening values. Metals exceeding the adopted ecological screening values included cadmium, copper, lead, nickel, and zinc. Concentrations of cadmium, lead and nickel in excess of the adopted human health (drinking water and/or recreational) screening values were also detected in a number of groundwater samples.

As the groundwater in this area is generally unsuitable for beneficial use and there were no registered groundwater extraction wells located in the vicinity of the Site, the groundwater is not considered a human health or ecological receptor in itself. The screening values were therefore adopted to evaluate potential risks associated with the discharge of groundwater into Lake Liddell, where it may affect recreational users or aquatic organisms. Metal impacts within Lake Liddell and its tributaries are discussed further in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

# 5.4 DATA QUALITY

The data presented in the ESA was considered to generally be of a suitable quality and completeness to provide a baseline of environmental conditions at the Site. Whilst some minor non-conformances have been identified in relation to field and laboratory QA/QC, these are not considered to have a material impact on the outcomes of this assessment.

With specific regard to the completeness of the assessment, it is noted that samples were collected from more than 90% of the proposed locations. A summary of the locations unable to be completed due to various reasons is provided in *Table 3.1*.

Whilst samples for asbestos laboratory analysis were not collected from a small number of AECs, no potential ACM was observed during investigation in these areas and, as such, this is not considered to represent a significant data gap. Electrical conductivity field readings appeared to be erroneously low in a small number of wells; however the saline nature of groundwater has been established across the Site and thus these minor data errors are not considered to affect the overall findings. An assessment of additional assessment works considered warranted is provided in *Section 5.5.5*.

### 5.5 **OVERALL DISCUSSION**

The primary objective of this Stage 2 ESA was to develop a baseline assessment of environmental conditions at the Site and within the immediate surrounding receiving environments at or near the time of the transaction. The results of the assessment have also been used to assess;

- The nature and extent of soil and/or groundwater impact on / beneath the Site and in relation to neighbouring sensitive receptors.
- Whether the impacts at the Site represent a risk to human health and/or the environment, based on the continuation of the current use.
- Whether the impact at the Site is likely to warrant notification / regulation under the *CLM Act 1997*.
- Whether material remediation is considered likely to be required.
- Whether the data collected during the assessment was of a suitable quality and completeness to provide a baseline of environmental conditions at the Site.

The overall results of the assessment are discussed herein, with reference to these objectives.

# 5.5.1 Summary – The Nature and Extent of Soil, Sediment, Groundwater and Surface Water Impact

A CSM was developed, which identified the following ecological and human receptors:

- onsite employees, including intrusive workers potentially labouring within shallow trenches/excavations;
- recreational users of Lake Liddell and the Hunter River;
- terrestrial ecological receptors within the open space areas both on and surrounding the Site; and
- freshwater aquatic organisms within Lake Liddell and the Hunter River.

Soil and groundwater data were compared against published environmental quality levels to provide a screening level assessment of potential risks to these identified receptors. Sediment and surface water quality within Lake Liddell and surrounding waterways was assessed in *Preliminary Environmental Site Assessment, Bayswater Power Station (ERM, 2013a).* The findings of the screening process indicated that concentrations in soil and groundwater generally complied with the adopted screening levels, with the exceptions as discussed in the following sections.

### Onsite Soil

- Asbestos was detected in surface soils beneath pipelines constructed of ACM within AEC LB (Liddell Ash Dam), at one location in AEC LJ (Dangerous Goods, Flammable Liquids and Stores) and at one location in AEC LO (Former and current maintenance stores, workshops, foam generator and unofficial lay-down areas).
- TRH were detected in excess of the Ecological Screening Levels in AECs LD (Bulk Fuel Storage - Mobile Plant Refuelling), LE (Bulk Fuel Storage - Fuel Oil Installation), LF (Bulk Fuel Storage - Transformer Road ASTs and Waste Oil AST), LJ (Dangerous Goods, Flammable Liquids and Stores), LL (Hunter Valley Gas Turbine) and LQ (Transformer operations / Transformer Road).
- Benzo(a)pyrene was detected in excess of the Ecological Screening Levels in AECs LL (Hunter Valley Gas Turbine) and LP (Fill Material (Site Levelling and Shoreline Expansion).
- Copper and zinc was detected at concentrations in excess of the Ecological Investigation Levels for commercial/industrial sites in soil samples collected from AEC LJ (Landfills Waste Disposal and Borrow Pit).

# Onsite Groundwater

- Metals including arsenic, cadmium, lead, nickel and selenium were detected at concentrations in excess of the NHMRC (2011) drinking water values in groundwater samples collected from various monitoring wells located across the Site. Lead, selenium and nickel also exceeded the NHMRC (2008) recreational water values in a smaller subset of those locations.
- Benzene was detected at concentrations in excess of the NHMRC (2011) drinking water values in groundwater samples collected from AECs LC (Bulk Fuel Storage - Light Vehicle Refuelling), LE (Bulk Fuel Storage - Fuel Oil Installation ), LL (Hunter Valley Gas Turbine), LO (Former and current maintenance stores, workshops, foam generator and unofficial lay-down areas) and LT (Water Intake and Pump Station).
- Ethylbenzene, toluene and xylenes were detected at concentrations in excess of the NHMRC (2011) drinking water values in groundwater samples collected from AEC LC (Bulk Fuel Storage Light Vehicle Refuelling).
- Tetrachloroethene (PCE) was detected at a concentration in excess of the NHMRC (2011) drinking water values in groundwater samples collected from AEC LO (Former and current maintenance stores, workshops, foam generator and unofficial lay-down areas).
- Benzene and xylene (ortho) were detected at concentrations in excess of the ecological screening levels for freshwater environments in groundwater samples collected from AEC LC (Bulk Fuel Storage Light Vehicle Refuelling).
- Metals including boron, cadmium, copper, lead, manganese, mercury, nickel, selenium and zinc were detected at concentrations in excess of the ecological screening values for freshwater environments in groundwater samples collected from various monitoring wells located across the site.

# General Observations

No free-phase product was observed at any of the sampling locations.

Potential asbestos fibre bundles and some fragments were observed in surface soils in the immediate vicinity of the pipework which runs between the power block and the Liddell Ash Dam (coinciding with many of the locations where asbestos fibres were detected in soil samples). Asbestos fibres were also detected within fill material (<0.5 m bgl) within AECs LJ (Dangerous Goods, Flammable Liquids and Stores) and LO (Former and current maintenance stores, workshops, foam generator and unofficial lay-down areas).
It is noted that the vertical boring of soils is not an ideal method via which to identify asbestos impacts in soils. The absence of asbestos within fill materials or upon surface soils in other areas across the Site therefore cannot be guaranteed on the basis of the results of this assessment. Similarly, as with any investigation of this nature, the potential exists for unidentified contamination to exist between the completed sampling locations both within and between AECs.

# Summary – Does the Identified Impact Represent a Risk to Human Health and/or the Environment?

The approach to the screening of the data gathered in this assessment was to initially adopt the most conservative potential assessment values. The exceedences of the screening values outlined in *Section 3.5.2* were subsequently assessed on a case by case basis, in light of the specific characteristics of the individual samples and the AEC from which those samples were collected. The conclusions of these further assessments are presented in the following sections.

## Onsite Soil

5.5.2

The asbestos impacts identified in soils beneath the pipelines within AEC LB (along with the pipelines) has been recognised by Macquarie Generation as an issue which represent a potential health risk and hence Macquarie Generation is in the process of developing a management strategy to appropriately mitigate these risks as set out in *Ash & Dust - Position Paper* -(Macquarie Generation, 2013).

Hydrocarbons (as TRH) were detected at concentrations exceeding the adopted ESLs in soil samples collected from AEC LD (Bulk Fuel Storage -Mobile Plant Refuelling), LE (Bulk Fuel Storage - Fuel Oil Installation), LF (Bulk Fuel Storage - Transformer Road ASTs and Waste Oil AST), LJ (Dangerous Goods, Flammable Liquids and Stores), LL (Hunter Valley Gas LQ (Transformer operations Turbine) and / Transformer Road). Benzo(a)pyrene was also detected in excess of the ESLs in AECs LL (Hunter Valley Gas Turbine) and LP (Fill Material (Site Levelling and Shoreline Expansion)). The detections in these areas are not considered significant as these operational areas are predominantly covered in concrete hardstand or compacted gravel. These areas were therefore not considered to have significant ecological value and thus the application of the ESLs is considered to be overly conservative. The identified exceedences of the ESLs are therefore not considered to be representative of a potential environmental risk.

Zinc and copper were detected at concentrations in excess of the adopted EILs in one sample collected from AEC LS (Landfills (Waste Disposal and Borrow Pit)). This sample was collected from a location on the side of an active roadway where the ground surface was primarily comprised of compacted gravel.

The ecological value of the area for growth of terrestrial flora is considered to be low and therefore the application of the EILs is considered to be conservative. This impact appears to be localised and is considered unlikely to represent a significant risk to the terrestrial environment under the ongoing use of the Site as a Power Station.

## **On-site Groundwater**

Groundwater beneath the Site is not extracted for potable use and a search of licensed groundwater bores has not identified any potential groundwater abstraction receptors in the vicinity of the Site. The saline groundwater conditions are also likely to reduce the opportunity for the potable or domestic use of groundwater in the vicinity of the Site in the future. Similarly, the groundwater beneath the Site is not considered to be an aquatic environment of significance for the purpose of this assessment.

The ANZECC (2000) freshwater ecological trigger values and NHMRC (2008) recreational screening levels were therefore adopted in this assessment to evaluate potential risks to the aquatic environment and recreational users of Lake Liddell and its tributaries. The NHMRC (2011) drinking water screening values were also adopted to evaluate the requirement to report groundwater contamination across the Site, in accordance with the DECC (2009) *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act* 1997 (refer to *Section* 5.5.3).

Measured concentrations of metals in groundwater exceeded the ANZECC (2000) freshwater trigger values and NHMRC (2011) drinking water values in a large number of wells across the Site. Exceedences of the NHMRC (2008) recreational screening levels were also reported in a smaller number of wells.

Based on the topography and available hydrological information, all AECs at the Site were considered to ultimately discharge to Lake Liddell. It is also important to note that there are also direct and indirect discharges of storm, process and cooling waters to the Lake as described in *Section 2*.

Monitoring wells installed within the catchment of Lake Liddell reported concentrations of a wide range of metals at concentrations exceeding the adopted human health and / or ecological screening values as detailed in the summary of each AEC provided in *Section 5*. Given the widespread nature of these detections and since Lake Liddell represents the primary surface water receptor from both an ecological and human health (recreational) perspective, potential impacts to groundwater within this catchment should be assessed in that context, that is via direct assessment of the quality of surface water and sediment within the lake itself. The potential for risks to human health and the environment from groundwater impacts occurring within the catchment of Lake Liddell have been assessed and recommendations made in *Project Symphony – Bayswater Power Station, Stage 2 Environmental Site Assessment* (ERM, 2014).

## 5.5.3 Summary – Does the Impact Warrant Notification under the Contaminated Land Management Act 1997?

Under section 60 of the *CLM Act 1997*, a person whose activities have contaminated land or a landowner whose land has been contaminated is required to notify NSW EPA when they become aware of the contamination. The DECC (2009) *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997*, state that a landowner or a person whose activities have contaminated land is required to notify NSW EPA that the land is contaminated if;

- the level of the contaminant exceeds the appropriate published screening level with respect to a current or approved use of the land, <u>and</u> people have been, or foreseeably will be, exposed to the contaminant; or
- the contamination meets a specific criterion prescribed by the regulations; or
- the contaminant has entered, or will foreseeably enter, neighbouring land, the atmosphere, groundwater or surface water, <u>and</u> the contamination exceeds, or will foreseeably exceed, an appropriate published screening value and will foreseeably continue to remain above that level.

The soil and groundwater results obtained in this assessment have been compared against the screening levels specified in NSW DECC (2009) *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act* 1997 and a number of exceedences have been identified.

Every exceedence of these screening levels is not, however, required to be reported to the NSW EPA. If the exceedence is representative of background conditions; or offsite migration of contamination to an adjoining property has not occurred <u>and</u> any onsite contamination has been adequately addressed under the Environmental Planning and Assessment Act then reporting under the CLM Act is not required. Further to this, in the case of onsite soil contamination, if no plausible exposure pathway to people or the environment is present, reporting is also not required.

On the basis of the discussions outlined in *Section 5.5.2*, the constituents that have been identified in onsite soil, sediment, surface water and groundwater are generally not exceeding the relevant screening values as cited in NSW DECC (2009).

The identified impacts which do exceed the relevant screening values and are considered to warrant further consideration with regards to whether a duty to report may exist under the CLM Act include the following:

• asbestos fines and fibres identified in surface soils beneath the asbestos pipelines within AEC LB;

- asbestos identified in soils in AECs LJ and LO;
- volatile TRH, BTEX and naphthalene detected in groundwater in AEC LC;
- benzene and naphthalene detected in groundwater in AEC LE;
- benzene, naphthalene and PCE detected in groundwater in AEC LO;
- metals detected at concentrations not attributable to background conditions in groundwater at various locations across the Site.

Each of these issues is discussed in further detail below.

## Asbestos in Soils with AEC LB

Asbestos was identified in soils beneath the ACM pipelines within AEC LB. As noted previously, Macquarie Generation is in the process of developing a management strategy in relation to this issue as set out in Macquarie Generation (December 2013) *Ash & Dust - Position Paper*. Further, ERM understands that access to these areas has been restricted to mitigate potential risks to human health in the short term and that further delineation and quantification of asbestos in soils in this area is being undertaken. It is recommended that the outcomes of this further assessment are reviewed prior to a decision relating to notification of NSW EPA.

It is also noted that Macquarie Generation has stated that NSW Workcover is considered the relevant regulatory body in relation to this issue, given that there is no public access to the area and that the pipelines themselves represent a greater potential source of airborne fibres than the fibres identified within surface soils.

## Asbestos in Soils in AEC LJ and LO

Asbestos was detected in soils within AECs LJ and LO. It is noted that neither of these detections were at surface and in both locations the soils were covered in hard standing across the local vicinity. Given the fact that the detected asbestos was not present at the ground surface and was beneath hard standing, a plausible exposure pathway would not exist unless penetration through the hard standing and excavation were to occur.

The preparation and implementation of a suitable Environmental Management Plan (EMP) by an appropriately qualified professional would therefore mitigate the risk of exposure and remove the need for notification of this issue. In the short term, the Engineering Manager has been notified of this issue such that any excavation works in these areas may be appropriately managed.

Volatile TRH, BTEX and naphthalene in groundwater in AEC LC

Volatile TRH, BTEX and naphthalene were identified in groundwater at concentrations exceeding the human health (drinking water) screening value in groundwater samples collected from the Light Vehicle Refuelling area (AEC LC). Benzene was also reported in excess of the HSL for vapour intrusion (2-<4 m bgl) at the Light Vehicle Refuelling area (AEC LC). Although the HSLs are not specifically referenced in NSW DECC (2009), notification to the NSW EPA is recommended for this area regardless, due to the concentrations of benzene in groundwater in relation to the notification triggers; however it would be prudent to undertake an additional round of confirmatory groundwater sampling at the relevant locations to confirm the reported concentrations prior to preparing the notification.

## Benzene and Naphthalene in Groundwater - AEC LE

Benzene and naphthalene were detected in groundwater at concentrations exceeding the human health (drinking water) screening value and/or the ecological screening value in samples collected from the Fuel Oil Installation (AEC LE). Based on the magnitude of these exceedences in relation to the notification triggers, notification of groundwater contamination in the Fuel Oil Installation to the NSW EPA is recommended; however it would be prudent to undertake an additional round of confirmatory groundwater sampling at the relevant locations to confirm the reported concentrations prior to preparing the notification.

## Benzene, naphthalene and PCE in groundwater - AEC LO

Benzene and naphthalene were detected in groundwater at concentrations exceeding the human health (drinking water) screening value and/or the ecological screening value and PCE was detected at a concentration exceeding the human health (drinking water) screening value in samples collected from the former and current maintenance stores, workshops, foam generator and unofficial lay-down areas (AEC LO). Based on the magnitude of these exceedences in relation to the notification triggers, notification of groundwater contamination in the Fuel Oil Installation to the NSW EPA is recommended; however it would be prudent to undertake an additional round of confirmatory groundwater sampling at the relevant locations to confirm the reported concentrations prior to preparing the notification.

## Benzene in groundwater – AEC LT

Benzene was detected in groundwater at a concentration marginally exceeding the human health (drinking water) screening value in one sample collected from the Water Intake and Pump Station (AEC LT). Given that the detection within AEC LT was at a concentration near the laboratory LOR and marginally exceeding the screening value, it is suggested that an additional round of confirmatory sampling be undertaken to confirm this result and to assess the likelihood that the detected concentration will foreseeably remain above the human health (drinking water) screening value.

It is, however, considered unlikely that these impacts would be considered significant enough to warrant regulation by the NSW EPA given the absence of groundwater use on-site, it's saline nature and the proximity of the results to the screening value. A determination should be made following the completion of confirmatory sampling.

## Metals in Groundwater

Various metals were detected at concentrations above the human health (drinking water) and / or ecological screening values which were not attributable to background conditions in groundwater at a number of locations across the Site. In the majority of instances, results from monitoring wells BY\_MY24, BY\_MW25 and BY\_MW26 (located near the north eastern boundary of the Bayswater site on the north eastern side of Lake Liddell) were utilised in establishing background conditions in the absence of suitable locations on the Liddell site. It is noted that low pH was observed in groundwater at BY\_MW24 which may have resulted in elevated concentrations of metals at this location and hence data from this well was utilised with caution when assessing results. In addition to the background monitoring wells, background values based on data presented in the *Hydrogeochemistry of the Upper Hunter River Valley* groundwater report (Kellett *et al*, 1987) have also been considered.

A summary of metals exceeding screening values with regard to the duty to report is provided in *Table 5.24* (over).

## Table 5.24 Groundwater Screening in Relation to a Potential Duty to Report

Metal	Exceedences of Human Health (Drinking Water) or Ecological Screening Value	Relevant AECs
Arsenic	Yes, drinking water value exceeded. All except those in AECs LQ and LR were well within the same order of magnitude as background	LE, LG, LI, LL, LO, LP, LQ,
	locations. The more significant exceedences in AECs LE, LQ and LR in particular may warrant reporting.	LR and LS.
Boron	Yes, ecological value exceeded and average background concentration reported in Kellett et al (1987) (0.17 mg/L) were both exceeded in	LB, LI, LP and LT.
	some locations. It should be noted that the majority of the noted exceedences are in the vicinity of the Ash Dam which is regulated	
	under the Site EPL. The remainder of the exceedences are related to wells which are likely to be representative of water within Lake	
	Liddell where exceedences for boron were also noted (refer to Project Symphony - Bayswater Power Station, Stage 2 Environmental Site	
	Assessment (ERM, 2014)).	
Cadmium	Yes, both ecological and drinking water were exceeded however background concentrations of 0.002 - 0.003 mg/L were recorded in	LA, LB, LD, LE, LH, LI, LJ,
	Bayswater wells BY_MW25 and BY_MW24 respectively. The majority of exceedences were within this range and well within the same	LL, LM, LN, LO, LP, LQ, LR,
	order of magnitude with the exception of wells within AECs LA, LE, LO and LS which may warrant reporting.	LS, LT and LV
Copper	Yes, ecological value exceeded however background concentrations of 0.0131 - 0.0601 mg/L were identified in Bayswater wells	LA, LB, LC, LD, LE, LG, LH,
	BY_MW26 and BY_MW24 (respectively) all of the observed results are within this range with the maximum concentration recorded	LI, LJ, LL, LM, LN, LO, LP,
	being 0.028 mg/L in LS_MW02. Reporting of these exceedences is therefore not considered to be warranted.	LQ, LR, LS, LU and LV
Lead	Yes, both ecological and drinking water values were exceeded however background concentrations of 0.0375 - 0.04 mg/L were	LB, LE, LG, LI, LJ, LM, LO,
	identified in Bayswater wells BY_MW26 and BY_MW24 (respectively) several results exceed these values and hence may warrant	LP, LQ and LV.
	reporting.	
Manganese	Yes, ecological value exceeded, and average background concentrations (1.13 mg/L) from literature are lower than the ecological	LA, LB, LE, LI, LP and LT.
	screening value, hence the noted exceedences may warrant reporting.	
Mercury	Yes, two exceedences of the ecological value were identified within AECs LB and LC. Both results are close to the LOR, therefore	LB and LC.
	suggest confirmatory samples to confirm result and assess the likelihood that the detected concentrations will foreseeably remain above	
	the ecological screening value.	
Nickel	Yes, both ecological and drinking water values were exceeded however background concentration of 0.195 mg/L was identified in	LA, LB, LC, LD, LE, LH, LI,
	Bayswater well BY_MW25, several results exceed this value and hence may warrant reporting.	LJ, LL, LM, LN, LO, LP, LQ,
		LR, LS, LT, LU and LV
Selenium	Yes, both ecological and drinking water values exceeded, it appears that background concentrations are lower than the screening	LB, LE, LP and LM.
	values, hence the noted exceedences may warrant reporting (particularly within AEC LB). It should be noted that the highest	
	concentration observed was immediately adjacent to the Ash Dam which is regulated under the Site EPL.	
Zinc	Yes, both ecological and drinking water values were exceeded however background concentrations of 0.142 mg/L were identified in	LA, LB, LC, LD, LE, LG, LH,
	Bayswater well BY_MW25 (which aligns closely with the literature background value of 0.15 mg/L). Several results exceed this value	LI, LJ, LL, LM, LN, LO, LP,
	and hence may warrant reporting.	LQ, LR, LS, LT, LU and LV

Whilst many of the metals exceedences can be related to background concentrations, some elevated concentrations which appear to be related to on-site sources have been identified. In many instances however, these impacts are related to activities which are already regulated and monitored under the Site EPL. The identified impacts are also generally located well within the site boundaries and up gradient of Lake Liddell, the discharge from which is also monitored and regulated under the Site EPL.

In ERM's professional experience it is NSW EPA's preference to regulate issues such as these under either the POEO Act or the CLM Act rather than both, and, in the case of licensed premises, it is usually the POEO Act which is preferred. ERM therefore considers that NSW EPA would most likely continue to manage this issue under the POEO Act via the Site EPL, and hence would not require formal notification under the CLM Act, however this approach should be confirmed with NSW EPA to ensure strict adherence to the NSW DECC (2009) guidelines. Given the similarities of issues with metals in groundwater and surface water at Bayswater Power Station, the discussion of this issue with NSW EPA is recommended to be undertaken at the same time for both sites.

In some cases where groundwater results appear anomalous and / or are close to the laboratory LOR / screening values an additional round of confirmatory sampling has been recommended to confirm result and assess the likelihood that the detected concentrations will foreseeably remain above the ecological screening value. If the results remain above the screening values then notification may then warrant further consideration.

## 5.5.4 Summary – Is Material Remediation or Management Likely to be Required?

Based on the results of this assessment, the issues where potentially material remediation or management on a per source basis is likely to be required relate to the identified asbestos impacts in soils surrounding the asbestos pipelines located within AEC LB and water management issues related to Liddell Ash Dam. Both of these issues are known to Macquarie Generation. Independently of this assessment, Macquarie Generation has been developing management approaches alongside independent professional experts and regulators.

Whilst some further assessment may be required to address the hydrocarbon impacts in the bulk fuel storage areas (AECs LC and LE) and in the former and current maintenance stores, workshops, foam generator and unofficial lay-down areas (AEC LO), it is unlikely that costs related to this work would exceed the material threshold.

The remediation of the identified asbestos impacts surrounding the pipelines is an issue which Macquarie Generation is in the process of engaging a contractor to manage / remediate.

Given that this issue has been identified specifically within the Sale and Purchase Agreement for the Site as pre-existing contamination and that a separate process is underway to address the issue, ERM has not prepared an estimate of the costs associated with the management / remediation of this issue since the actual costs will soon be known.

The NSW EPA has required a Pollution Reduction Program report to be developed in relation to managing surface and groundwater issues in the vicinity of Liddell Ash Dam, with a reporting deadline of 31 January 2014. At the time of reporting, the response to the Pollution Reduction Program was not yet available for review; however it is expected that this report will focus on reducing seepage rather than completing remediation. Whilst indicative costs to address this requirement at Liddell Ash Dam were not available for review at the time of reporting, it is expected that costs could potentially be material. It is understood that indicative cost estimates for completion of this work will be included in the Pollution Reduction Program report.

Whilst some other issues have been identified which may warrant further assessment (as summarised in Section 5.5.5 below) it is not anticipated that any of these additional assessment works would be likely to constitute a potential material issue. Similarly it is not considered likely that any of these issues would proceed beyond the stages of quantitative risk assessment and / or the preparation and implementation of an appropriate environmental management plan to manage potential exposure, none of which are considered likely to constitute a material cost.

## 5.5.5 Summary – Is the Data Suitable to Provide a Baseline of Environmental Conditions at the Site and Immediate Surrounding Receiving Environments

The data presented in the ESA was considered to generally be of a suitable quality and completeness to provide a baseline of environmental conditions at the Site as at or near the time of the transaction. It is noted that the majority of the locations proposed in the Preliminary ESA were able to be advanced.

Some limited additional characterisation of the baseline conditions at the Site is however considered to be required in the following areas, on the basis of the outcomes of this investigation;

Soils

• Asbestos – delineation of asbestos contamination in the vicinity of the asbestos containing pipelines within AEC LB. It is recommended that this delineation be carried out in accordance with the methodology outlined in the ASC NEPM (2013) and should include more detailed inspections of these areas and the collection of soil samples for quantitative analysis.

## Groundwater

- Further assessment of groundwater impacts from petroleum hydrocarbons in AECs LC (Bulk Fuel Storage – Light Vehicle Refuelling), LE (Bulk Fuel Storage – Fuel Oil Installation) and LO (Former and current maintenance stores, workshops, foam generator and unofficial lay-down areas) is recommended to clarify the potential for these contaminants to migrate to Lake Liddell. This could include fate and transport modelling and detailed risk assessment.
- Additional characterisation at AEC LC is also recommended to assess the potential for vapour intrusion in relation to the Main Stores building. This work could include re-sampling of groundwater wells in the vicinity of this area, installation and sampling of soil vapour wells and/or sub-slab vapour points, and collection of indoor air samples from within the Main Stores building.
- Additional sampling of existing groundwater wells is recommended within AEC LT (Water Intake and Pump Station) to confirm the measured concentrations of benzene with specific reference to clarification of the duty to report contamination under Section 60 of the CLM Act.
- Confirmatory groundwater sampling of existing wells and ultra-trace laboratory analysis is also recommended within AEC LO (former and current maintenance stores, workshops, foam generator and unofficial lay-down areas) to assess whether vinyl chloride is present due to the detection of PCE and other breakdown products.

#### CONCLUSIONS

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ERM completed a Stage 2 ESA at Liddell Power Station in order to develop a baseline assessment of environmental conditions at the Site as at or near the time of the transaction. Soil and groundwater data were compared against published environmental quality levels to provide a screening level assessment of potential risks to identified human and environmental receptors. The following conclusions were made based on the data collected during the investigation:

- *The key impacts identified at the Site include* asbestos present beneath the ACM pipelines to the Liddell Ash Dam, potential risks associated with inhalation of petroleum hydrocarbon vapours near the light vehicle refuelling area, potential migration of petroleum hydrocarbons from the bulk fuel storage areas towards Lake Liddell.
- No contamination issues were identified which would require material management or remediation based on the current and continued use of the Site as a Power Station with the exception of the potential material issues associated with identified asbestos impacts in soils surrounding the ACM pipelines to Liddell Ash Dam and water management issues related to Liddell Ash Dam that are the subject of a Pollution Reduction Program report currently being prepared. Whilst some further assessment may be required to address the hydrocarbon impacts in the bulk fuel storage areas and in the former and current maintenance stores, workshops, foam generator and unofficial lay-down areas, it is unlikely that costs related to this work would exceed the material threshold.
- With regard to the duty to report contamination under the CLM Act (1997) and the potential for regulation, ERM notes the following:
- The reporting of the concentrations of benzene, naphthalene and PCE measured in on-site groundwater to the NSW EPA is warranted on the basis of exceedences of the notification triggers (based on NHMRC (2011) drinking water screening values) in order to maintain compliance with the CLM Act 1997. It would however be prudent to undertake an additional round of confirmatory groundwater sampling at the relevant locations to confirm the reported concentrations prior to preparing the notification. The concentrations of these contaminants are, however, considered unlikely in ERM's opinion to trigger a requirement for active management or remediation. It is considered most likely that regulation of these issues by NSW EPA would (if necessary) be undertaken under the existing EPL rather than under the CLM Act.

- ERM understands that Macquarie Generation is in the process of developing a management strategy in relation to the identified asbestos issues in the vicinity of the ACM pipelines. Further, ERM understands that access to these areas has been restricted to mitigate potential risks to human health in the short term and that further delineation and quantification of asbestos in soils in this area is being undertaken. It is recommended that the outcomes of this further assessment are reviewed prior to a decision relating to notification of NSW EPA under Sec. 60 of the CLM Act 1997. It is also noted that Macquarie Generation has discussed the broader asbestos pipeline issue (given that it relates predominantly to infrastructure and the soil impacts are secondary) with WorkCover NSW. It is therefore considered that they would likely be the key regulator, if required, for this issue rather than NSW EPA.
- Various metals were detected at concentrations above the human health (drinking water) and / or ecological screening values which were not attributable to background conditions in groundwater at a number of locations across the Site. In many instances however, these impacts are related to activities which are already regulated and monitored under the Site EPL. The identified impacts are also generally located well within the site boundaries and up gradient of Lake Liddell, the discharge from which is also monitored and regulated under the Site EPL. ERM considers that NSW EPA would most likely continue to manage this issue under the POEO Act via the Site EPL, and hence the issue would not require formal notification under the CLM Act, however this approach should be confirmed with NSW EPA to ensure strict adherence to the NSW DECC (2009) guidelines.
- The preparation and implementation of a suitable Environmental Management Plan (EMP) by an appropriately qualified professional is recommended to mitigate the risk of exposure to asbestos associated with areas in close proximity to the ACM pipelines to the ash dam and relating to the potential for asbestos to occur in soils across the site as a whole.
- The data presented in the ESA was generally considered to be of a suitable quality and completeness to provide a baseline of environmental conditions at the Site and immediate surrounding receiving environments. On the basis of the outcomes of this investigation, some limited additional characterisation of the baseline conditions at the Site is considered to be required as follows;

- Delineation of asbestos contamination in the vicinity of the ACM pipelines to the ash dam. Macquarie Generation is aware of the ACM issue at the pipelines and is currently further investigation and risk assessment (refer to Macquarie Generation (2013) *Ash & Dust Position Paper* (Ref: 06.03.03.38 ENV.03.03.048)). It is recommended that this delineation be carried out in accordance with the methodology outlined in the ASC NEPM (2013) and should include more detailed inspections of these areas and the collection of soil samples for quantitative analysis.
- Further assessment of groundwater impacts from petroleum hydrocarbons in bulk fuel storage areas is recommended to clarify the potential for these contaminants to migrate to Lake Liddell. This could include fate and transport modelling and detailed risk assessment.
- Additional characterisation at the light vehicle refuelling area is also recommended to assess the potential for vapour intrusion in relation to the Main Stores building. This work could include re-sampling of groundwater wells in the vicinity of this area, installation and sampling of soil vapour wells and/or sub-slab vapour points, and collection of indoor air samples from within the Main Stores building.
- Confirmatory groundwater sampling is recommended at the water intake and pump station to confirm the measured concentrations of benzene with specific reference to clarification of the duty to report contamination under Section 60 of the CLM Act 1997.
- Confirmatory groundwater sampling and ultra-trace laboratory analysis is also recommended at the former and current maintenance stores, workshops, foam generator and unofficial lay-down areas to assess whether vinyl chloride is present due to detection of PCE and other breakdown products.

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Annex A

## Figures







- LV Buffer Land

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Drawing No:	0224198s_L_ES	
Date:	31/01/2014	
Drawn By:	GC	
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 Surface Soil Sample (Beneath LB - Ash Asbestos Pipeline) Monitoring Well Not Installed
 Monitoring Well Abandoned
 Monitoring Well Abandoned Existing Monitoring Well

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LS - Landfills (Waste Disposal and Borrow Pit) LV - Buffer Land

100 150m

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- Legend Site Boundary AECs:
- Monitoring Well LL - Hunter Valley Gas Turbine
- Monitoring Well Not Installed Monitoring Well Abandoned
- Soil Bore

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Client: Macquarie Generation	Figure 4.5 - Completed Sampling
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Drawn By: GC Reviewed Bv: HC	Project Symphony - Liddell Stage 2 - Environmental Site Assessment
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eration	Figure 7.3 - Site Wide Groundwater	
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