

## Submission to the Environment Protection Authority on the Verde Terra Pty Ltd application to have EPL 11395 varied.

Please note - if you would like your name and contact details to be kept confidential, the EPA will remove them before providing your submission to Verde Terra Pty Ltd and the Land and Environment Court. Please tick the circle below this box.

- I would like my personal details to be kept confidential and not disclosed to Verde Terra Pty Ltd.

I am a resident of the Central Coast and potentially affected by this landfill. Y  N

I strongly **oppose** the reissuing of EPL 11395 to Verde Terra Pty Ltd because I believe that Verde Terra must be required to submit a new DA and Environmental Assessment, not only for assessment by Central Coast Council, but also to be subject to public exhibition and comment.

### I am also concerned about the following reasons in ticked boxes:

- The purity of the water supply for the Central Coast is at risk from run-off and seepage of leachate into the creek system supplying Mardi and Mangrove dams.
- The NSW Environment Protection Authority (EPA) and Central Coast Council, both regulatory authorities, are united in opposing the renewal of the licence, for the stated reason of environmental safety.
- EPA Guidelines for Solid Waste Landfills would today prohibit the siting of this landfill at the head of a water catchment.
- For over a decade, the Community is on record as frequently opposing the size, nature and operation of the landfill.
- Stormwater and leachate management at the landfill has been and still is poorly managed, with potential for contamination of ground and surface water, and potable water off-site.
- The landfill presently holds 800,000 tonnes of waste, 10x that permitted by the 1998 development consent (DC). Without considering the DC or environmental safety, in 2014 the Land and Environment Court (LEC) approved a further 1.3 million tonnes of waste to be imported into four new cells (W, X, Y and Z) in Area B. Central Coast Council requires a new Environmental Impact Statement and Development Application for this major change. Verde Terra Pty Ltd has not submitted either.
- The present waste mound is over 85% unlined, allowing toxic leachate to enter the underlying Zone 4 Kulnura Mangrove Mountain aquifer and ground water.
- The EPA has not transferred important pollution control guidelines from its 'EPA Guidelines for Solid Waste Management' to this landfill's licence, creating a loophole for the Operator to pollute without penalty.
- The current three stormwater ponds and leachate holding pond have been operating in an unlicensed area for 10 years, outside EPA's jurisdiction, emphasising slack management of the site by all parties.
- Increase in truck traffic carrying waste in a rural community to an *average* of 55 truck movements/day over a 10 year period.

- A 6-7 million litre odoriferous leachate holding pond is planned for siting on the golf course near a gully leading to Stringybark Creek. It has the potential to contaminate both golf course and creek and drive away golfers.
- Dust, noise and smell will affect neighbouring Central Mangrove School, adjoining private properties and the Mangrove Mountain Memorial Club with its restaurant.
- Current EPA water testing is inadequate for detection of pollution of ground and surface water by the landfill, assurances of safety in a 2017 EPA Media Release notwithstanding.
- EPA oversight of the landfill has drawn extensive criticism for several years from the local Mountain Districts Community and from a broad base of Central Coast residents.
- The Community is in favour of a golf course, but it was purchased by the landfill owner in 2014 and is no longer owned by the Community, so its future is in doubt.
- The aquifer has been breached at the base of Cell W, without a licence to take water. This will also interfere with lining and longevity of this Cell.
- The Community and regulatory bodies such as the EPA and Central Coast Council have minimal or limited oversight of Verde Terra Pty Ltd's activities on the landfill. The granting of a licence renewal will quite literally be a licence to pollute.
- An independent consultant appointed by the EPA with input from Mountain Districts Association, Alan Dyer, produced a report entitled 'Technical, Environmental and Operational Review of Mangrove Mountain Landfill' in May 2017, with 61 suggestions for improvement. This report has been omitted by Verde Terra Pty Ltd in its supporting documents.
- Sub-surface methane gas levels between 2012 and 2016 have been as high as 896,000 ppm, far higher than the 500 ppm permitted, with no acknowledgement or warning by the EPA or Verde Terra Pty Ltd. These levels indicate that putrescible waste has been landfilled, which is not permitted.

**Email your Submission to:** MML Submissions@epa.nsw.gov.au, or  
**Mail to:** MML Submissions-Waste Branch, Environment Protection Authority,  
 PO Box A290, Sydney South NSW 1232

Name: \_\_\_\_\_

Address \_\_\_\_\_

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Phone/Email \_\_\_\_\_

**Additional Comments (you may attach an additional page if required)**

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