

Annex F6

Investigation Reports of
Environmental Quality
Limit Exceedance

Investigation Report of Environmental Quality Limit Exceedance

Project	South East New Territories (SENT) Landfill Extension
Date	13 April 2023
Time	11:49
Monitoring Location	MWX-6
Parameter	Chemical Oxygen Demand (COD)
Limit Levels	>46 mg /L
Measured Level	54 mg /L
Possible reason	<p>Groundwater contaminated with leachate is commonly characterized by high COD and ammoniacal-nitrogen levels as a result of degradation of organic matters in the waste. The ammoniacal-nitrogen monitoring result at groundwater monitoring well MWX-6 (3.74 mg/L) and the COD monitoring results of the groundwater monitoring wells adjacent to MWX-6 (MWX-5: 27 mg/L and MWX-7: 27 mg/L) are well within the respective limit levels. Hence, there is a low possibility of the elevation of COD level at MWX-6 is due to leachate contamination from SENTX operation or at least it is not conclusive to base on these results to demonstrate exceedance was due to leachate contamination.</p> <p>In accordance with Table 4.5b of the updated EM&A Manual, repeat measurement was conducted on 4 May 2023 to confirm findings. COD concentration of 36 mg/L (below the Limit Level) was measured at MWX-6 during the sampling event, which demonstrate no consecutive groundwater quality impact at the monitoring location.</p> <p>According to the findings of the desktop review commissioned by GVL and EPD (the Employer) in May 2021 to investigate the potential sources of the elevated methane levels at the perimeter landfill gas monitoring wells at SENTX, pockets of organic matters are identified in the fill materials of the SENTX site upon review of the historical site investigation borehole logs at the Project Site area. It is possible that the elevated COD concentration measured at MWX-6 (with detection of elevated levels of methane (up to 12.2% v/v) and in close proximity to LFG13, which shows elevated methane levels continuously) on 13 April 2023 could be due to localised organic matters within or around the monitoring wells and background fluctuation.</p> <p>Due to the presence of influencing factor from non-project source and the subsequent month monitoring results at MWX-6 did not show any exceedance, there is no adequate evidence showing that the COD level exceedance measured at MWX-6 on 13 April 2023 was deemed to Project-related activities.</p>

	<p>It should also be noted that although the COD level exceeded the limit level of the EM&A programme, it is still well within the WPCO effluent discharge limit of COD (80 mg/L) and the standard for effluents discharged into the inshore waters of the Junk Bay Water Control Zone as stipulated under Technical Memorandum Standards for Effluents Discharged into Drainage and Sewerage Systems, Inland and Coastal Waters (80 mg/L). The slight exceedance of COD at MWX-6 on 13 April 2023 will not cause adverse water quality impact to the Junk Bay Water Control Zone.</p>
Action Taken / Action to be Taken	<p>Examination of environmental performance of the Project will be continued during the weekly inspections. The Contractor is reminded to implement relevant and appropriate mitigation measures according to the updated EM&A Manual to avoid any exceedance of the Action and Limit Levels.</p> <p>ET will continue to closely monitor the groundwater quality monitoring results and collect additional data for investigation and further review, if necessary.</p>
Remarks	-

Prepared by: Abbey Lau
Designation: Environmental Team
Date: 22 May 2023

Investigation Report of Environmental Quality Limit Exceedance

Project	South East New Territories (SENT) Landfill Extension
Date	4 May 2023
Time	MWX-5: 11:16 MWX-8: 10:32
Monitoring Location	MWX-5, MWX-8
Parameter	Chemical Oxygen Demand (COD)
Limit Levels	MWX-5: >30 mg /L MWX-8: >50 mg /L
Measured Level	MWX-5: 38 mg /L MWX-8: 70 mg /L
Possible reason	<p>Groundwater contaminated with leachate is commonly characterized by high COD and ammoniacal-nitrogen levels as a result of degradation of organic matters in the waste. The ammoniacal-nitrogen monitoring result at groundwater monitoring wells MWX-5 (2.44 mg/L) and MWX-8 (8.63 mg/L), and the COD monitoring results of the groundwater monitoring wells adjacent to MWX-5 (MWX-4: 29 mg/L and MWX-6: 36 mg/L) and MWX-8 (MWX-7: 29 mg/L and MWX-9: 6 mg/L) are well within the respective limit levels. Hence, there is a low possibility of the elevation of COD level at MWX-5 and MWX-8 is due to leachate contamination from SENTX operation or at least it is not conclusive to base on these results to demonstrate exceedance was due to leachate contamination.</p> <p>In accordance with Table 4.5b of the updated EM&A Manual, repeat measurement was conducted on 8 June 2023 to confirm findings. COD concentration of 26 mg/L and 36 mg/L (below the Limit Level) was measured at MWX-5 and MWX-8, respectively during the sampling event, which demonstrate no consecutive groundwater quality impact at the monitoring locations.</p> <p>According to the findings of the desktop review commissioned by GVL and EPD (the Employer) in May 2021 to investigate the potential sources of the elevated methane levels at the perimeter landfill gas monitoring wells at SENTX, pockets of organic matters are identified in the fill materials of the SENTX site upon review of the historical site investigation borehole logs at the Project Site area. It is possible that the elevated COD concentration measured at MWX-5 and MWX-8 on 4 May 2023 could be due to localised organic matters within or around the monitoring wells and background fluctuation.</p> <p>Due to the presence of influencing factor from non-project source and the subsequent month monitoring results at MWX-5 and MWX-8 did not show any exceedance, there is no adequate</p>

	<p>evidence showing that the COD level exceedances measured at MWX-5 and MWX-8 on 4 May 2023 were deemed to Project-related activities.</p> <p>It should also be noted that although the COD level exceeded the limit level of the EM&A programme, it is still well within the WPCO effluent discharge limit of COD (80 mg/L) and the standard for effluents discharged into the inshore waters of the Junk Bay Water Control Zone as stipulated under Technical Memorandum Standards for Effluents Discharged into Drainage and Sewerage Systems, Inland and Coastal Waters (80 mg/L). The slight exceedance of COD at MWX-5 and MWX-8 on 4 May 2023 will not cause adverse water quality impact to the Junk Bay Water Control Zone.</p>
<p>Action Taken / Action to be Taken</p>	<p>Examination of environmental performance of the Project will be continued during the weekly inspections. The Contractor is reminded to implement relevant and appropriate mitigation measures according to the updated EM&A Manual to avoid any exceedance of the Action and Limit Levels.</p> <p>ET will continue to closely monitor the groundwater quality monitoring results and collect additional data for investigation and further review, if necessary.</p>
<p>Remarks</p>	<p>-</p>

Prepared by: Abbey Lau

Designation: Environmental Team

Date: 29 June 2023

Investigation Report of Environmental Quality Limit Exceedance

Project	South East New Territories (SENT) Landfill Extension
Date	17 - 22 June 2023
Monitoring Location	Pump Station No. 4X (Cell 4X)
Parameter	Leachate level
Limit Levels	> 186 cm
Measured Level	<u>Pump Station No. 4X (Average of Meter No. X-7 and No. X-8)</u> 17 June 2023: 234 cm 18 June 2023: 279 cm 19 June 2023: 299 cm 20 June 2023: 287 cm 21 June 2023: 260 cm 22 June 2023: 216 cm
Possible reason	<p>From the on-site rainfall record of June 2023, heavy rainfall events (up to 90 mm per day) were recorded from 17 to 22 June 2023. Amber and red rainstorm warning signals were also issued by the Hong Kong Observatory on 17 and 18 June 2023. As confirmed by the Contractor, the leachate collection system and leachate treatment plant were under normal operating conditions during the reporting period.</p> <p>Accumulation of surface water at Cell 4X was observed during the reporting period, which could contribute to the leachate level exceedances. Based on this observation, the leachate level exceedances at Pump Station No. 4X were deemed to Project-related activities.</p> <p>It is understood that the large volume of leachate (contaminated surface runoff) accumulated at Cell 4X has exceeded the leachate treatment capacity (daily maximum effluent discharge volume of 1,633 m³ recorded from 17 to 22 June 2023, with daily effluent discharge limit of 2,000 m³ as stipulated in the WPCO license).</p>
Action Taken / Action to be Taken	Examination of environmental performance of the Project will be continued during the weekly inspections. The Contractor is reminded to closely monitor the operating conditions of the leachate collection system (e.g. set alarm when the leachate level reach about 80% of the Limit Level) and pump out the leachate for treatment to avoid any exceedance of the Limit Level.
Remarks	-

Prepared by: Abbey Lau
Designation: Environmental Team
Date: 29 June 2023