

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	5 July 2024
Time	MWX-7: 10:07
	MWX-9: 09:19
Monitoring Location	MWX-7, MWX-9
Parameter	Chemical Oxygen Demand (COD)
Limit Level	MWX-7: >36 mg/L
	MWX-9: >71 mg/L
Measured Level	MWX-7: 49 mg/L
	MWX-9: 108 mg/L
Possible reason	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-7 (6.08 mg/L) and MWX-9 (0.51 mg/L), and the COD monitoring results of the groundwater monitoring wells adjacent to MWX-7 and MWX-9 (MWX-6: 41 mg/L; MWX-8: 29 mg/L and MWX-10: 5 mg/L) are well within the respective limit levels. Hence, there is a low possibility of the elevation of COD level at MWX-7 and MWX-9 are due to leachate contamination from SENTX operation or at least it is not conclusive to base on these results to demonstrate exceedances were due to leachate contamination. In accordance with Table 4.5b of the updated EM&A Manual, repeat measurement was conducted on 5 August 2024 to confirm findings. COD concentration of <20 mg/L (below the Limit Level) was measured at MWX-9 during the sampling event. However, COD concentration of 45 mg/L was measured at MWX-7 during the sampling event, which shown consecutive exceedance of the groundwater quality limit. 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-7 and MWX-9 on 5 August 2024 could be due to localised organic matters within or around the monitoring wells and background fluctuation.
	Due to the presence of influencing factor from non-project source, there is no adequate evidence showing that the COD level exceedances measured at MWX-7 and MWX-9 on 5 August 2024 were deemed to Project-related activities.

Action Taken / Action	Examination of environmental performance of the Project will be
to be Taken	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.
	ET will continue to closely monitor the groundwater quality
	monitoring results and collect additional data for investigation and
	further review, if necessary.
Remarks	-

Prepared by: Abbey Lau
Designation: Environmental Team
Date: 27 August 2024

Investigation Report of Environmental Quality Limit Exceedance		
Project	South East New Territories (SENT) Landfill Extension	
Date	5 August 2024	
Time	10:12	
Monitoring Location	MWX-7	
Parameter	Ammoniacal-nitrogen and Chemical Oxygen Demand (COD)	
Limit Level	Ammoniacal-nitrogen: >6.55 mg /L COD: >36 mg /L	
Measured Level	Ammoniacal-nitrogen: 6.92 mg /L COD: 45 mg /L	
Possible reason	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 adjacent to MWX-7 (MWX-6: 3.15 mg/L and MWX-8: 3.97 mg/L) and the COD monitoring results of the groundwater monitoring wells adjacent to MWX-7 (MWX-6: 40 mg/L and MWX-8: 30 mg/L) are well within the respective limit levels. Hence, there is a low possibility of the elevation of ammoniacal-nitrogen and COD level at MWX-7 are due to leachate contamination from SENTX operation or at least it is not conclusive to base on these results to demonstrate exceedances were due to leachate contamination.	
	In accordance with Table 4.5b of the updated EM&A Manual, repeat measurement was conducted on 12 September 2024 to confirm findings. COD concentration of 6 mg/L (below the Limit Level) and ammoniacal-nitrogen of 0.14 mg/L (below the Limit Level) were measured at MWX-7 during the sampling event, which demonstrate no consecutive groundwater quality impact at the monitoring locations.	
	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 ammoniacal-nitrogen and COD concentration measured at MWX-7 on 5 August 2024 could be due to localised organic matters within or around the monitoring well and background fluctuation. Due to the presence of influencing factor from non-project source, there is no adequate evidence showing that the ammoniacal-nitrogen and COD level exceedances measured at MWX-7 on 5 August 2024 were deemed to Project-related activities.	



Investigation Report of Environmental Quality Limit Exceedance 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-7 on 5 August 2024 will not cause adverse water quality impact to the Junk Bay Water Control Zone. Action Taken / Action Examination of environmental performance of the Project will be continued during the weekly inspections. The Contractor is reminded to be Taken to implement relevant and appropriate mitigation measures according to the updated EM&A Manual to avoid any exceedance of the Action and Limit Levels. ET will continue to closely monitor the groundwater quality monitoring results and collect additional data for investigation and further review, if necessary. Remarks Prepared by: Abbey Lau Designation: **Environmental Team** 3 October 2024 Date

