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Our ref: A3251260

Ms Toni Matulick
Secretary
Select Committee on Unconventional Gas Mining
PO Box 6100
Canberra ACT 2600

16 February 2016

Dear Ms Matulick

Select Committee on Unconventional Gas Mining Response to Submission 12 of Dr Geralyn McCarron

Thank you for the opportunity to respond to the submission of Dr Geralyn McCarron. Dr McCarron has made a number of references to Unitywater in her submission (pages 25 to 29) which are inaccurate and we appreciate the opportunity to address these inaccuracies for the benefit of the Committee and the public record.

1. *'After "treatment" by BCD [predecessor to Toxfree], Unitywater.....accepted the effluent into the Burpengary East treatment plant. From there it was discharged by diffuser 1.2km from the mouth of the Caboolture River into Moreton Bay".'*

Unitywater response:

It should be noted that Unitywater has a trade waste agreement with Toxfree in relation to trade waste treated at its Narangba facility. Unitywater did not accept the CSG waste water directly, as implied by this statement, but accepted treated water, which was essentially saline water which was then further treated with other sewage at the Burpengary East Sewage Treatment Plant. Effluent from this plant is discharged into the Caboolture River in accordance with the Queensland State Department of Environment and Heritage licence conditions.

The CSG waste water is treated by Toxfree through a multi-stage filtration system as a safety measure to ensure that any contaminants are removed. All the treated water is tested prior to discharge to sewer. This means that this particular stream of waste water has effectively been treated twice: once by Toxfree, and once more by Unitywater through its sewage treatment process.



2. *“Unity water [sic] relaxed the already fairly minimal sewage admission standards advertised on its website”.*

Unitywater response:

The waste water must meet sewer admission limits before it can enter Unitywater’s sewerage system. These limits are informed by a national guideline set up by the Water Services Association of Australia.

The trade waste agreement also contains provisions regarding the quality of waste water entering the sewage system. There was no relaxation of the mandatory parameters.

3. *Unity water [sic] depended on BCD/Toxfree to treat waste, but there are very significant problems with Plasma arc technology”*

Unitywater response:

Treatment of waste water by the generator before it is accepted by Unitywater into its sewerage system to ensure that the waste is within the sewer admission limits is normal practice. This ensures that there are no adverse impacts on the sewage treatment plant. Unitywater is unable to comment on the Plasma arc technology, but notes that Toxfree has never breached its conditions of the trade waste agreement.

4. *There is no evidence of adequate or appropriate oversight or monitoring of Toxfree’s activities by Unitywater”*

Unitywater response:

This statement is clearly incorrect. Unitywater performs laboratory testing of this waste water and random compliance sampling on a monthly basis. Testing is undertaken at Unitywater’s NATA accredited laboratory.

5. *“The only random tests that Unitywater carried out were for sulphate, phosphorus, nitrogen, suspended solids, COD, TDS, conductivity and pH. There was no testing done for radioactive contaminants associated with produce water”*

Unitywater response:

Unitywater undertakes analysis of composite samples for compliance purposes. Toxfree also undertakes analysis of their wastewater in a NATA approved laboratory before discharging into the sewer and these results are forwarded to Unitywater.

Toxfree undertakes or has access to other parameter analysis including:

- Dissolved Metals;
- Dissolved Mercury;
- Silica;
- Chlorine;
- Fluoride;
- Hydrocarbon Gases;



- Monocyclic Aromatic Hydrocarbons;
- Oxygenated Compounds;
- Fumigants;
- Halogenated Aliphatic Compounds;
- Halogenated Aromatic Compounds;
- Trihalomethanes;
- Phenolic Compounds;
- Polynuclear Aromatic Compounds;
- Total Petroleum Hydrocarbons;
- Total Recoverable Hydrocarbons;
- BTEXN and
- Ethanolamines.

6. *“By September 25th 2015 Unitywater had wiped its hands of the problem. Mr Simon Taylor from Unitywater wrote that Toxfree has advised that they will no longer receive coal seam gas water at their Narangba site....However in November 2015 AGL confirmed that Toxfree were again transporting two tankers three times a week from Gloucester and on 2nd December Unitywater confirmed that they were receiving it...”*

Unitywater response:

Toxfree provided advice in early September 2015 that the last load of CSG waste water would be received at the Narangba site on 11 September 2015. This information was provided in good faith to Dr McCarron. However, Unitywater does not control when Toxfree receives CSG waste water and receipt of this waste water commenced again in November 2015. Regardless of whether the trade waste contains treated CSG waste water or not, all Toxfree's trade waste is tested for compliance. As previously mentioned Toxfree have met trade waste requirements.

7. *“The responses from the CEO Mr Soorley and customer relations officer... indicate a blasé and entirely inappropriate attitude towards this hazardous waste”.*

Unitywater response:

Unitywater rejects this assertion. The protection of customers, operators, the environment, and infrastructure is paramount to Unitywater's Board and Executive. Unitywater has a critical role in protecting public health and takes this responsibility seriously. Note also that Mr Soorley is the Chairman of Unitywater, not the CEO.

Yours sincerely

Jane Nant
General Counsel and Company Secretary