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Mr Paul Shepherd  
Chairman, IMC

**Re: Botany Groundwater Clean-Up Project, Independent Monitoring Committee Task 15**

Dear Paul.

My comments are restricted to dioxin sampling in the air emitted from the stack of the groundwater treatment plant.

Monthly dioxin sampling took place from March 2006 until February 2007. Monthly sampling was necessary because of the initial exceedence of the  $0.1 \mu\text{g}/\text{Nm}^3$  dioxin emission limit and lengthy investigations into the cause of these exceedences and the changes needed to reduce dioxin emissions. Since October 2006 all stack results have been below the  $0.1 \mu\text{g}/\text{Nm}^3$  limit except for one value of  $0.115 \mu\text{g}/\text{Nm}^3$  in December 2006 in a sample collected by SEM. Currently Task 17 is underway to analyse the dioxin results in more detail in order to investigate the dioxin formation mechanisms.

Since February 2007, dioxin sampling has been bimonthly.

I recommend that

- bimonthly dioxin sampling continue until Task 17 has been completed and the results presented to the CLC
- this sampling can be limited to single point sampling in the stack outlet
- the frequency of dioxin sampling be reassessed once Task 17 is completed.

Regards,

Dr Mark Hibberd  
Principal Research Scientist  
IMC member

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