



## **Document Control**

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Report Ver	sion 04							
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Date	17/07/2024	Date	17/07/2024	Date	17/07/2024			

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## 1. Introduction

### 1.1. Purpose

RARE Environmental Pty Ltd (RARE) was engaged by SciDev Pty Ltd (SciDev) to analyse and comment on raw turbidity monitoring data collected by their Water Quality Monitoring Systems (WQMSs) at the Huntly Bauxite Mine, owned and operated by Alcoa of Australia Limited (Alcoa). Stream turbidity monitoring is a core regulatory requirement stipulated as part of Alcoa's approvals and operating framework. The data for this reporting period was collected in January of 2024.

This report has been prepared to assess the quality of data provided and identify potential drainage incidents ('true' events) per the procedure detailed below within that data. Where possible recommendations are made for either WQMS network upgrades or further investigation of events identified within the data. This report should not be considered an assessment of the WQMS network and/or Alcoa's compliance to relevant legislation and requirements, nor should it be considered an assessment of the suitability of the adopted trigger level and event classification procedure.

#### 1.2. Context

Data from each location has been collected and compared against the drainage incident trigger level outlined in the *Environmental Protection (Darling Range Bauxite Mining Proposal) Exemption Order 2023* Schedule 1 Division 2 Cl. 6. Trigger events have then been assessed against Alcoa's turbidity event classification guidelines to determine whether the event is true, i.e. caused by stream turbidity, or false, i.e. caused by stream debris, algae or other. For the purpose of this report a turbidity event is an event where turbidity levels, measured by a WQMS, are at least 25 nephelometric turbidity units (NTU) for a period of at least 1 hour.

A site map showing the WQMSs locations is provided in Appendix A.

### 1.3. Monitoring Requirements

Under Schedule 1, Division 2 ("Controls on activities"), of the *Environmental Protection (Darling Range Bauxite Mining Proposals) Exemption Order 2023* a drainage incident is defined as:

- a) a runoff from a disturbance area to the surrounding environment of surface water that has a turbidity of at least 25 nephelometric turbidity units for a period of at least 1 hour; or
- b) a discharge from containment infrastructure that includes or may include environmentally hazardous material;

### 1.4. Water Quality Monitoring System (WQMS)

At the Huntly site, for this reporting period, 34 (thirty-four) WQMSs have been installed in streams within or downstream of mining operations to monitor stream turbidity levels. Each turbidity monitoring station is fitted with an Aquas SMR10 turbidity probe. The Aquas probes are placed directly in the streams, mounted at 90 degrees to the flow of water. Each sensor has a guard to protect the lens from larger debris and the units are fitted with a lens screen wiper. Note: disruptions or errant readings can occur with smaller pieces of debris (leaves etc.).

Data is collected via a Data Taker DT82 logger. Data from each logger is linked to an IOT data modem to transmit to a cloud-based platform. Data is logged locally in 6 second intervals with a 6-minute average pushed into the cloud-based platform. A float switch or cell indicates sensor immersion or a dry stream.



#### 1.5. Data Review & Event Classification Process

Data produced by the WQMSs is reviewed by RARE per the following procedure and in consultation with SciDev. This allows for the identification of true events that require investigation to determine whether the mining operations may have contributed to the elevated turbidity levels, and false events.

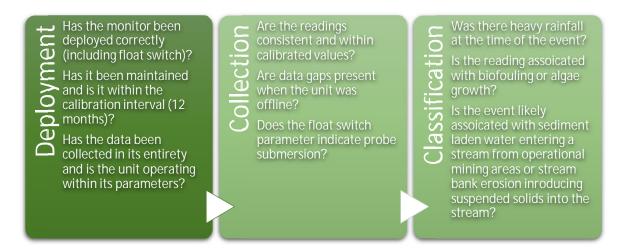


Figure 1: Data Review & Event Classification Process

The process considers the physical aspects of the WQMS deployment, the data collection by that monitor and finally classification of the events identified in that data. Classification of events is per Alcoa's procedure to identify events as true or false.

A 'true' stream turbidity exceedance event that is caused by an actual increase in stream water turbidity. Alcoa has identified that 'true' turbidity exceedance events typically show a sharp turbidity incline before gradually trailing off as the stream turbidity level returns to background.

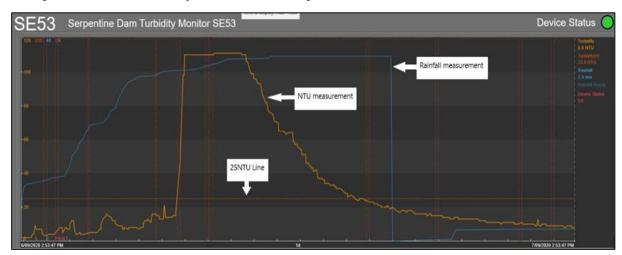


Figure 2: Typical 'true' exceedance event showing the sharp incline and gradually return to background levels.

'False' stream turbidity exceedance events are caused by factors other than an actual increase in stream water turbidity (i.e. organic debris covering the monitor such as sticks/leaves/algae, stream water turbulence or air bubbles and fluctuating water levels that intermittently cover the monitor lens and then recede). Alcoa has identified that 'false' turbidity exceedance events typically illustrate sharp inclines and declines for turbidity when the data is graphed over time and lack the distinctive 'bell curve' shape that is associated with 'true' turbidity exceedance events.



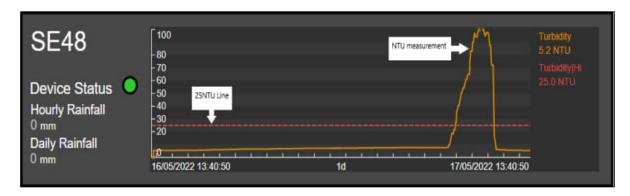


Figure 3: Typical 'false' exceedance event showing both a sharp incline and decline.

Any 'true' events identified in this report have been listed in **Section 3**.



## WQMS Data Review

For the reporting period of January 2024, 80,719 data points were collected by 19 (nineteen) of the 34 (thirty-four) WQMSs across the Huntly site. The other 15 (fifteen) units deployed did not produce any data this reporting period due to dry stream conditions or being offline for maintenance. From this data a total of 198 events were flagged where turbidity levels above 25 NTU were held for an hour or more. The following sections review this data, beginning with the deployment and operation of the WQMSs.

## 2.1. Deployment & Collection

From the data provided there were several units producing erroneous results, marked by spikes and/or non-sensical peaks. Furthermore, from information provided by SciDev, RARE understands the flow switch on several units was nonfunctional for the reporting period due to blockages or incorrect deployment.

RARE have identified WQMSs in Table 1 that require review in regards erroneous data. SciDev have confirmed that the data generated by these units is invalid and has been excluded from further analysis.

Excluding the data from these units leaves 31 (thirty-one) potential turbidity events during the reporting period across 5 (five) units as discussed in the following section.

Table 1: WQMS Requiring Review

Unit	Dates	Comment
SE02T	January 1st to 31st	Data skewed by outlier events likely caused by a dry stream. Further investigation is required and review of infrastructure upgrade options. Consider flow switch to disable measurements when the creek is dry.
SE51T	January 1st to 31st	Data missing from 02/01/24. Data provided on the 01/01/24 is consistently sustained over 25 NTU suggesting incorrect deployment.
SE61T	January 1st to 31st	All data is consistently sustained over 25 NTU suggesting incorrect deployment.
SN07T	January 1st to 31st	Data missing from 03/01. Data provided on 01/01/24 and 02/01/24 is sustained over 25 NTU suggesting incorrect deployment.



### 2.2. Classification

Analysis of the data from the 15 (fifteen) valid WQMSs identified 31 (thirty-one) potential turbidity events during the reporting period across 5 (five) units as summarised in Table 2. For this reporting period there were no 'true' turbidity events identified. Refer to the following section for analysis.

Table 2: Turbidity events summary

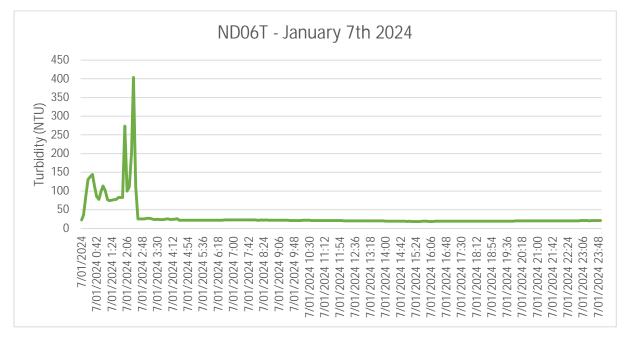
Date	Huntly WQMS Da	ta - January 2024 -	Events with turbid	ity > 25 NTU for a	n hour or more
Date	ND06T	ND13T	PD02T	SE03T	SE52T
1/01/2024		1			1
2/01/2024				1	
3/01/2024					1
4/01/2024			1		1
5/01/2024					
6/01/2024					1
7/01/2024	1				
8/01/2024			2		2
9/01/2024					2
10/01/2024					
11/01/2024			1	1	
12/01/2024					
13/01/2024				1	
14/01/2024				2	
15/01/2024				1	
16/01/2024				1	
17/01/2024				1	
18/01/2024				1	
19/01/2024					1
20/01/2024				1	
21/01/2024				1	
22/01/2024	1				
23/01/2024	1				
24/01/2024					
25/01/2024					
26/01/2024				1	
27/01/2024				1	
28/01/2024					
29/01/2024					
30/01/2024				1	
31/01/2024					

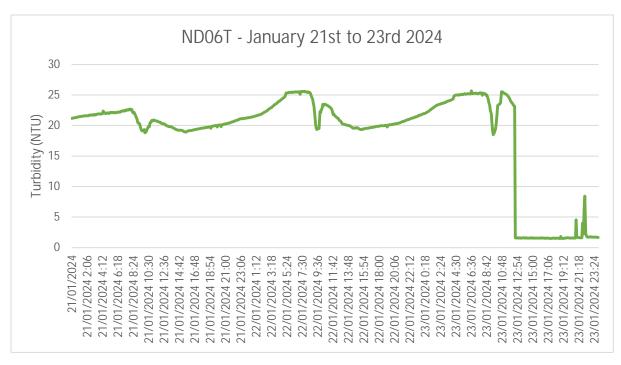
Note: False events have been annotated by black bold text. True events for further investigation are annotated by red bold text. See following section for analysis.



### 2.2.1. ND06T Potential Turbidity Events

Chart(s) for data flagged at monitor ND06 are shown below for the potential events identified in the reporting period.



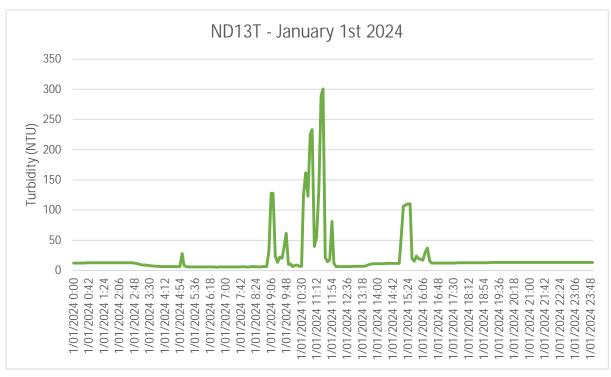


All three events at ND06T are marked by a sharp return to normal values indicative of a 'false' event.



## 2.2.2. ND13T Potential Turbidity Event

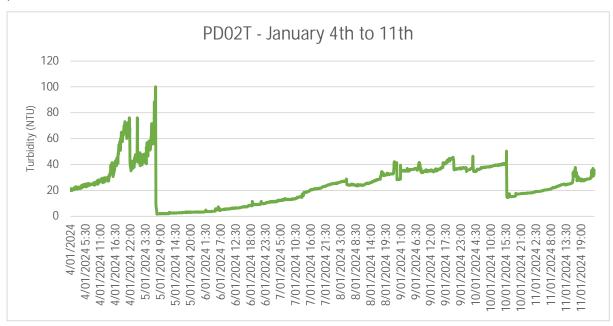
Chart(s) for data flagged at monitor ND13T are shown below for the potential events identified in the reporting period.



The event at ND13 is marked by sporadic peaks indicative of a 'false' event.

#### 2.2.3. PD02T Potential Turbidity Event

Chart(s) for data flagged at monitor PD02T are shown below for the potential events identified in the reporting period.



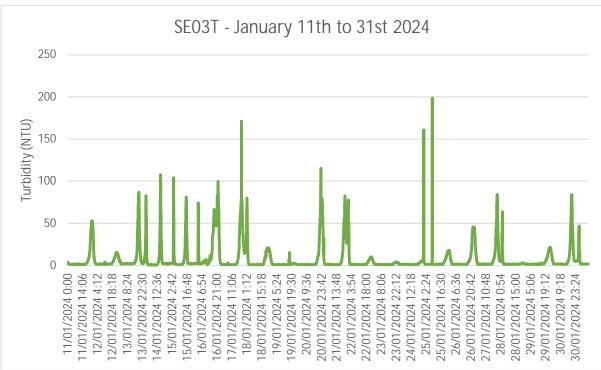
The event at PD02T is marked by sporadic peaks indicative of a 'false' event.



### 2.2.4. SE03T Potential Turbidity Events

Chart(s) for data flagged at monitor SE03T are shown below for the potential events identified in the reporting period.



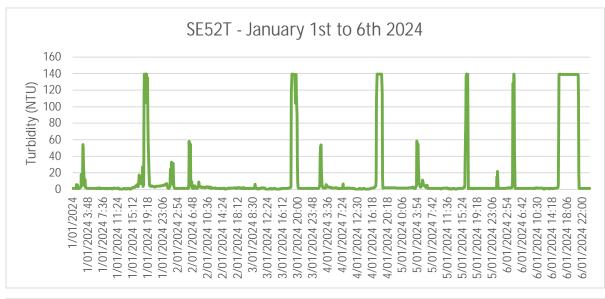


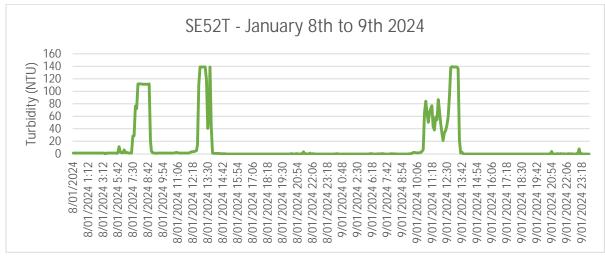
The two events at SE03T are marked by sporadic peaks indicative of a 'false' event.

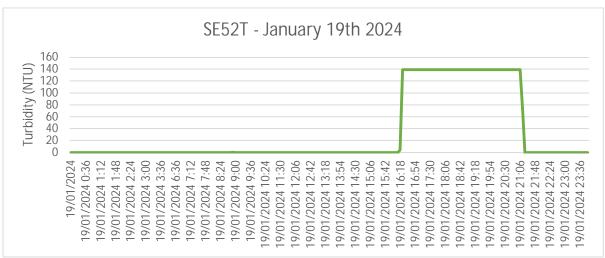


### 2.2.5. SE52T Potential Turbidity Events

Chart(s) for data flagged at monitor SE52T are shown below for the potential events identified in the reporting period.







All three events for SE52T events are marked by sporadic peaks indicative of a 'false' event.



# 2.3. True Turbidity Events

For this reporting period, no 'true' turbidity events were identified.



## 3. Recommendations

## 3.1. WQMS Network

#### RARE recommends:

- WQMSs include a flow switch or similar mechanism to detect when the stream is dry.
- Perform a maintenance and deployment review of all units to ensure their correct operation.



## 4. Raw WQMS Data

Date  Huntly WQMS Data - January 2024 - Events with turbidity > 25 NTU for an hour or more																			
Date	DB01T	ND06T	ND07T	ND12T	ND13T	ND14T	PD02T	SE02T	SE03T	SE07T	SE08T	SE11T	SE15T	SE34T	SE52T	SE51T	SE61T	SE62T	SN07T
1/01/2024					1										1	1	9		1
2/01/2024									1								6		
3/01/2024															1		9		
4/01/2024							1								1		5		
5/01/2024																	6		
6/01/2024															1		7		
7/01/2024		1															6		
8/01/2024							2								2		8		
9/01/2024								1							2		6		
10/01/2024								1									8		
11/01/2024							1		1								7		
12/01/2024																	6		
13/01/2024									1								8		
14/01/2024								2	2								5		
15/01/2024								1	1								4		
16/01/2024									1								7		
17/01/2024								2	1								10		
18/01/2024									1								10		
19/01/2024								1							1		8		
20/01/2024								1	1								7		
21/01/2024								1	1								9		
22/01/2024		1															4		
23/01/2024		1																	
24/01/2024																			
25/01/2024																			
26/01/2024									1										
27/01/2024									1										
28/01/2024																			
29/01/2024																			
30/01/2024									1										
31/01/2024																			

Note: False events have been annotated by black bold text. True events for further investigation are annotated by red bold text.

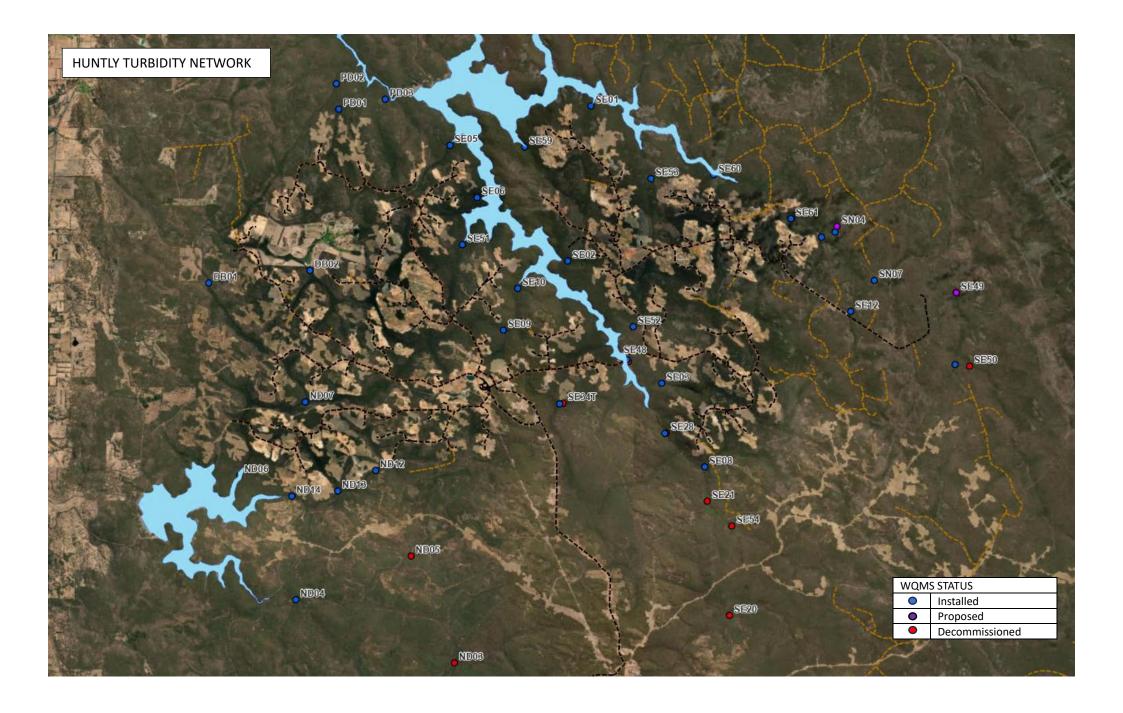


Data						Н	untly WQI	MS Data	January 2	024 - Turl	oidity (Dai	ily Averag	e, NTU)						
Date	DB01T	ND06T	ND07T	ND12T	ND13T	ND14T	PD02T	SE02T	SE03T	SE07T	SE08T	SE11T	SE15T	SE34T	SE52T	SE51T	SE61T	SE62T	SN07T
1/01/2024	5.7	21.4		11.1	21.3	1.6	7.6		4.4	18.7	19.3	8.6	9.2	7.9	9.5	222.4	113.6	6.6	67.9
2/01/2024	6.1	21.8		11.3	10.2	1.6	12.0		44.8	19.0	19.9	8.7	8.7	8.1	3.7		113.5	6.9	69.4
3/01/2024	5.9	21.7		11.3	11.1	1.9	17.1		82.4	18.9		8.1	7.4		12.4		113.5		
4/01/2024	5.9	22.2		11.3	14.1	1.7	34.3	5.8	124.5	18.9		7.7	7.3		11.3		83.6		
5/01/2024	5.9	22.2		11.3	14.3	1.5	19.1	6.1	2.5	18.7		7.7	7.4		6.3		54.7		
6/01/2024	5.8	22.1		11.2	14.3	1.6	6.3	5.9	1.6	18.8		7.8	7.3		32.9		57.9		
7/01/2024	55.7	31.3		11.0	14.3	1.4	16.3	5.8	2.0	18.9		7.8	7.0		7.9		57.9		
8/01/2024	5.6	20.2		11.0	14.4	2.1	27.5	6.0	2.5	19.1		7.8	7.1		16.4		58.6		
9/01/2024	5.8	20.6		11.2	14.6	1.8	36.7	218.0	3.0	19.5		7.8	7.4		17.5		54.5		
10/01/2024	5.8	20.8		11.3	14.8	1.9	31.1	263.5	2.7	20.3		7.8	7.4		0.7		57.3		
11/01/2024	6.0	20.9		11.0	14.6	3.9	24.1	8.7	6.4	20.6		7.8	7.3		9.1		58.8		
12/01/2024	5.8	20.5		11.0	14.6	3.4	25.1	7.8	6.1	20.5		8.0	7.3		1.6		55.1		
13/01/2024	5.5	19.9		10.9	14.4	1.7	13.4	10.2	9.8	20.3		7.8	7.2		0.8		63.7		
14/01/2024	5.1	19.8		10.8	14.3	1.6	6.0	387.0	9.6	20.3		7.7	7.3		0.3		49.0		
15/01/2024	5.3	19.9		10.9	14.4	1.9	6.7	546.3	8.4	20.6		7.6	7.3		0.1		44.7		
16/01/2024	5.5	19.8		10.7	14.5	2.0	5.1	95.1	20.5	21.3		7.7	6.5		2.0		60.2		
17/01/2024	6.0	19.9	6.4	10.7	14.6	1.7	5.1	82.4	13.0	20.7		7.8	6.2		0.3		58.4		
18/01/2024		20.4	10.2	11.0	14.8	2.5		13.7	8.8	21.4		7.8	6.6		0.2		59.6		
19/01/2024		20.6	8.8	11.0	14.7	2.0		934.4	2.0	21.6		7.7	6.5		97.9		65.5		
20/01/2024		20.6	7.5	10.9	14.5	1.8		1525.6	6.5	21.5		7.6	6.5		0.0		56.2		
21/01/2024		20.7	13.5	11.1	14.6	2.0		1372.0	15.1	21.4		7.8	6.7		0.2		61.1		
22/01/2024		21.8	13.3	11.3	14.8	2.9		728.0	6.2	21.7		7.8	6.8		0.3		71.7		
23/01/2024		12.8	7.9	11.4	14.9	2.2		14.7	2.0	22.0		7.8	6.7						
24/01/2024		1.7				0.7		16.1	1.9	21.9		7.8	6.7						
25/01/2024		1.6				8.0		15.8	7.3	21.6		7.7	7.0						
26/01/2024		2.0				8.0		15.4	6.9	21.5		7.8	6.9						
27/01/2024		2.1				8.0		14.9	12.1	21.6		7.9	6.8						
28/01/2024		1.8				8.0		14.7	3.3	21.9		7.8	6.9						
29/01/2024		1.8				8.0		16.1	3.8	21.9		8.0	6.8						
30/01/2024		2.4				0.8		16.7	11.1	21.7		8.1	6.7						
31/01/2024		2.0				0.8		22.9	5.5	21.4		7.8	6.7						

Note: Daily averages above 25 NTU have been annotated by black bold text. Daily averages inclusive of with true events for further investigation are annotated by red bold text. Grey shading indicates no data available for that day at that unit.

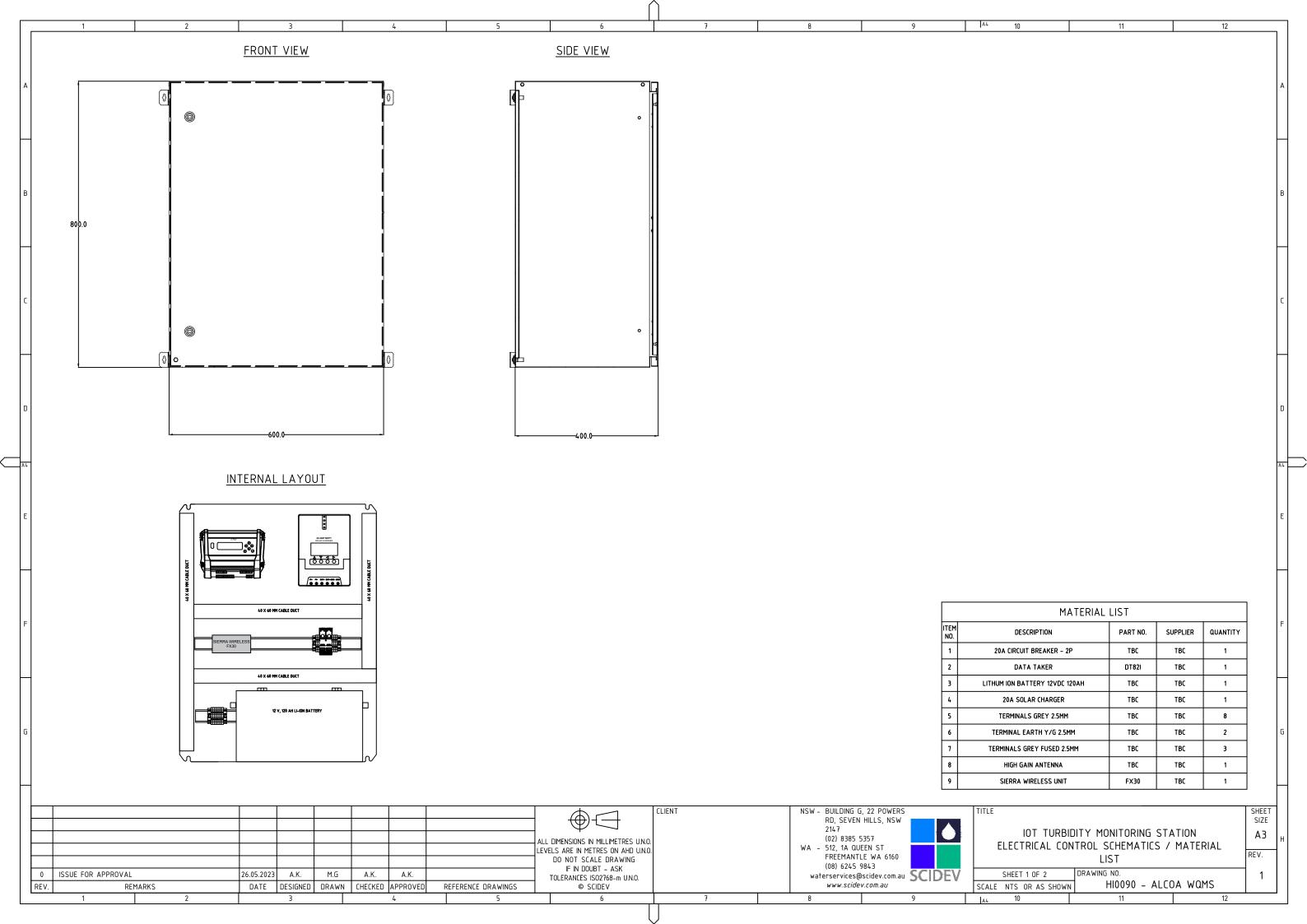


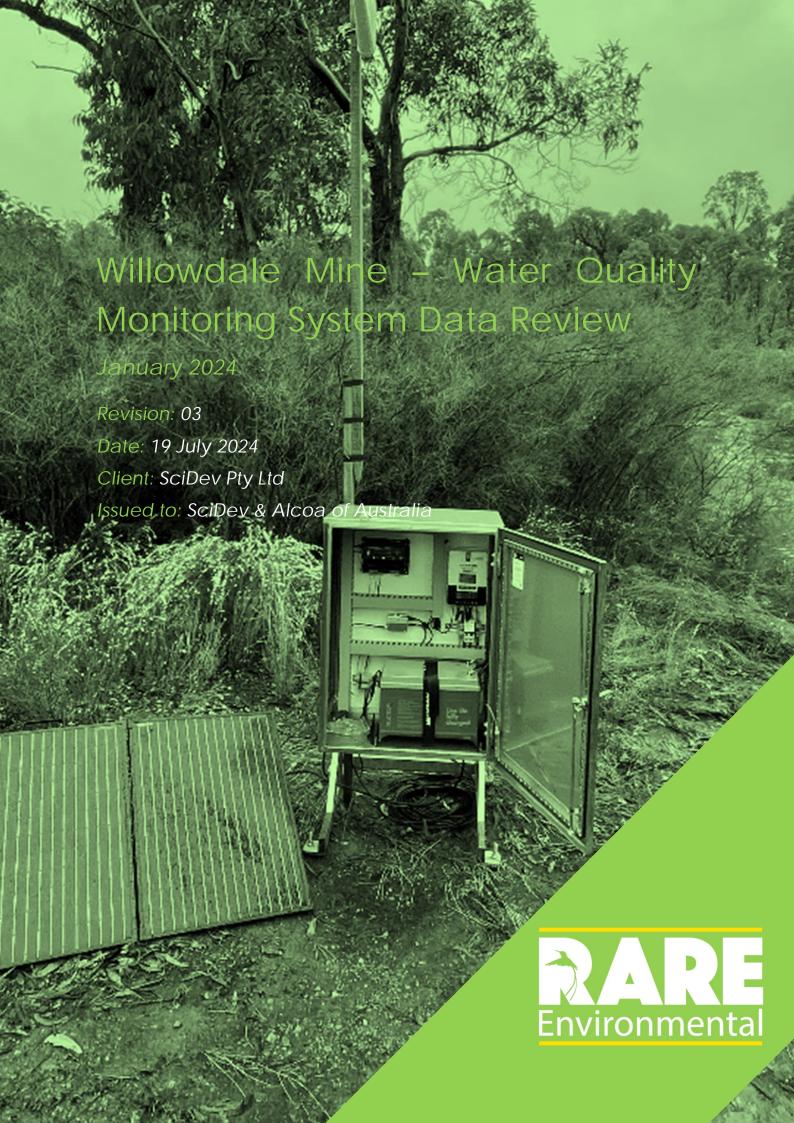
# Appendix A. Huntly WQMS Locations





# Appendix B. WQMS General Arrangement







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02	11/06/24	Issued for approval	SM	RD	RD	SciDev		
03	19/07/24	DWER feedback & update to match Section 6 area	SM	RD	RD	SciDev/Alcoa		

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Report Ver	Report Version 03								
	Prepared by	]	Technical Review	Ap	oproved for Issue				
			Dyer		layer .				
Name	Sarah Mathew	Name	Rob Dwyer	Name	Rob Dwyer				
Position	Env. Scientist	Position	Regional Manager	Position	Regional Manager				
Date	19/07/2024	Date	19/07/2024	Date	19/07/2024				

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## 1. Introduction

## 1.1. Purpose

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This report has been prepared to assess the quality of data provided and identify potential drainage incidents ('true' events) per the procedure detailed below within that data. Where possible recommendations are made for either WQMS network upgrades or further investigation of events identified within the data. This report should not be considered an assessment of the WQMS network and/or Alcoa's compliance to relevant legislation and requirements, nor should it be considered an assessment of the suitability of the adopted trigger level and event classification procedure.

#### 1.2. Context

Data from each location has been collected and compared against the drainage incident trigger level outlined in the *Environmental Protection (Darling Range Bauxite Mining Proposal) Exemption Order 2023* Schedule 1 Division 2 Cl. 6. Trigger events have then been assessed against Alcoa's turbidity event classification guidelines to determine whether the event is true, i.e. caused by stream turbidity, or false, i.e. caused by stream debris, algae or other. For the purpose of this report a turbidity event is an event where turbidity levels, measured by a WQMS, are at least 25 nephelometric turbidity units (NTU) for a period of at least 1 hour.

A site map showing the WQMSs locations is provided in Appendix A.

## 1.3. Monitoring Requirements

Under Schedule 1, Division 2 ("Controls on activities"), of the *Environmental Protection (Darling Range Bauxite Mining Proposals) Exemption Order 2023* a drainage incident is defined as:

- a) a runoff from a disturbance area to the surrounding environment of surface water that has a turbidity of at least 25 nephelometric turbidity units for a period of at least 1 hour; or
- b) a discharge from containment infrastructure that includes or may include environmentally hazardous material;

## 1.4. Water Quality Monitoring System (WQMS)

At the Willowdale site, for this reporting period, 1 (one) WQMS has been installed in streams within or downstream of mining operations to monitor stream turbidity levels. Each turbidity monitoring station is fitted with an Aquas SMR10 turbidity probe. The Aquas probes are placed directly in the streams, mounted at 90 degrees to the flow of water. Each sensor has a guard to protect the lens from larger debris and the units are fitted with a lens screen wiper. Note: disruptions or errant readings can occur with smaller pieces of debris (leaves etc.).

Data is collected via a Data Taker DT82 logger. Data from each logger is linked to an IOT data modem to transmit to a cloud-based platform. Data is logged locally in 6 second intervals with a 6-minute average pushed into the cloud-based platform. A float switch or cell indicates sensor immersion or a dry stream.



#### 1.5. Data Review & Event Classification Process

Data produced by the WQMSs is reviewed by RARE per the following procedure and in consultation with SciDev. This allows for the identification of true events that require investigation to determine whether the mining operations may have contributed to the elevated turbidity levels, and false events.

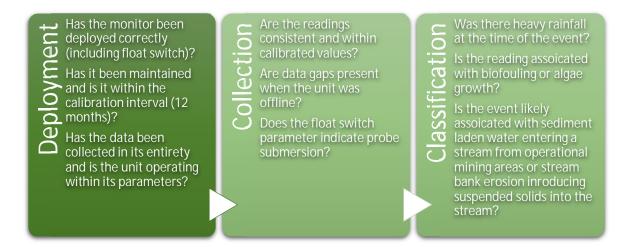


Figure 1: Data Review & Event Classification Process

The process considers the physical aspects of the WQMS deployment, the data collection by that monitor and finally classification of the events identified in that data. Classification of events is per Alcoa's procedure to identify events as true or false.

A 'true' stream turbidity exceedance event that is caused by an actual increase in stream water turbidity. Alcoa has identified that 'true' turbidity exceedance events typically show a sharp turbidity incline before gradually trailing off as the stream turbidity level returns to background.

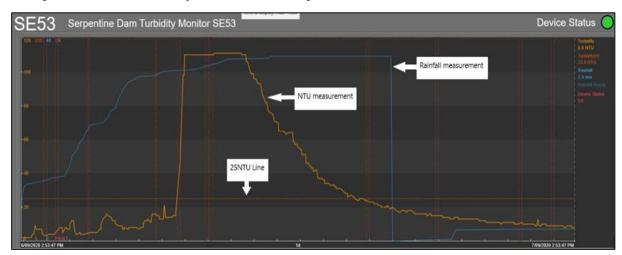


Figure 2: Typical 'true' exceedance event showing the sharp incline and gradually return to background levels.

'False' stream turbidity exceedance events are caused by factors other than an actual increase in stream water turbidity (i.e. organic debris covering the monitor such as sticks/leaves/algae, stream water turbulence or air bubbles and fluctuating water levels that intermittently cover the monitor lens and then recede). Alcoa has identified that 'false' turbidity exceedance events typically illustrate sharp inclines and declines for turbidity when the data is graphed over time and lack the distinctive 'bell curve' shape that is associated with 'true' turbidity exceedance events.



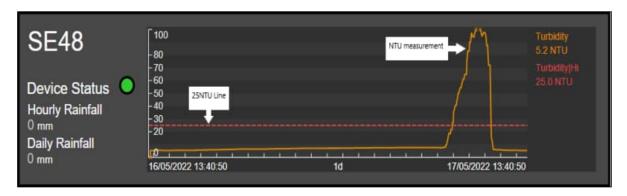


Figure 3: Typical 'false' exceedance event showing both a sharp incline and decline.

Any 'true' events identified in this report have been listed in **Section 3**.



## 2. WQMS Data Review

For the reporting period of January 2024, 5,076 data points were collected by 1 (one) WQMS across the Willowdale site. From this data a total of 0 events were flagged where turbidity levels above 25 were held for an hour or more. The following sections review this data, beginning with the deployment and operation of the WQMSs.

## 2.1. Deployment & Collection

RARE have identified that no WQMSs require review in regards erroneous data.

No potential turbidity events during the reporting period across the 1 (one) unit were identified as discussed in the following section.

Table 1: WQMS Requiring Review

Unit	Dates	Comment
N/A	N/A	N/A



### 2.2. Classification

Analysis of the data from the 1 (one) valid WQMSs identified no potential turbidity events during the reporting period as summarised in Table 2. For this reporting period there were no 'true' turbidity events identified. Refer to the following section for analysis.

Table 2: Turbidity events summary

	Willowdale WQMS Data - January 2024 - Events
Date	with turbidity > 25 NTU for an hour or more
	HV07
1/01/2024	
2/01/2024	
3/01/2024	
4/01/2024	
5/01/2024	
6/01/2024	
7/01/2024	
8/01/2024	
9/01/2024	
10/01/2024	
11/01/2024	
12/01/2024	
13/01/2024	
14/01/2024	
15/01/2024	
16/01/2024	
17/01/2024	
18/01/2024	
19/01/2024	
20/01/2024	
21/01/2024	
22/01/2024	
23/01/2024	
24/01/2024	
25/01/2024	
26/01/2024	
27/01/2024	
28/01/2024	
29/01/2024	
30/01/2024	
31/01/2024	

Note: False events have been annotated by black bold text. True events for further investigation are annotated by red bold text. See following section for analysis.



# 2.3. True Turbidity Events

For this reporting period, no 'true' turbidity events were identified.



## 3. Recommendations

## 3.1. WQMS Network

#### RARE recommends:

- WQMSs include a flow switch or similar mechanism to detect when the stream is dry.
- Perform a maintenance and deployment review of all units to ensure their correct operation.



## 4. Raw WQMS Data

Date	Willowdale WQMS Data - January 2024 - Events with turbidity > 25 NTU for an hour or more
Date	HV07
1/01/2024	11007
2/01/2024	
3/01/2024	
4/01/2024	
5/01/2024	
6/01/2024	
7/01/2024	
8/01/2024	
9/01/2024	
10/01/2024	
11/01/2024	
12/01/2024	
13/01/2024	
14/01/2024	
15/01/2024	
16/01/2024	
17/01/2024	
18/01/2024	
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21/01/2024	
22/01/2024	
23/01/2024	
24/01/2024	
25/01/2024	
26/01/2024	
27/01/2024	
28/01/2024	
29/01/2024	
30/01/2024	
31/01/2024	

Note: False events have been annotated by black bold text. True events for further investigation are annotated by red bold text.

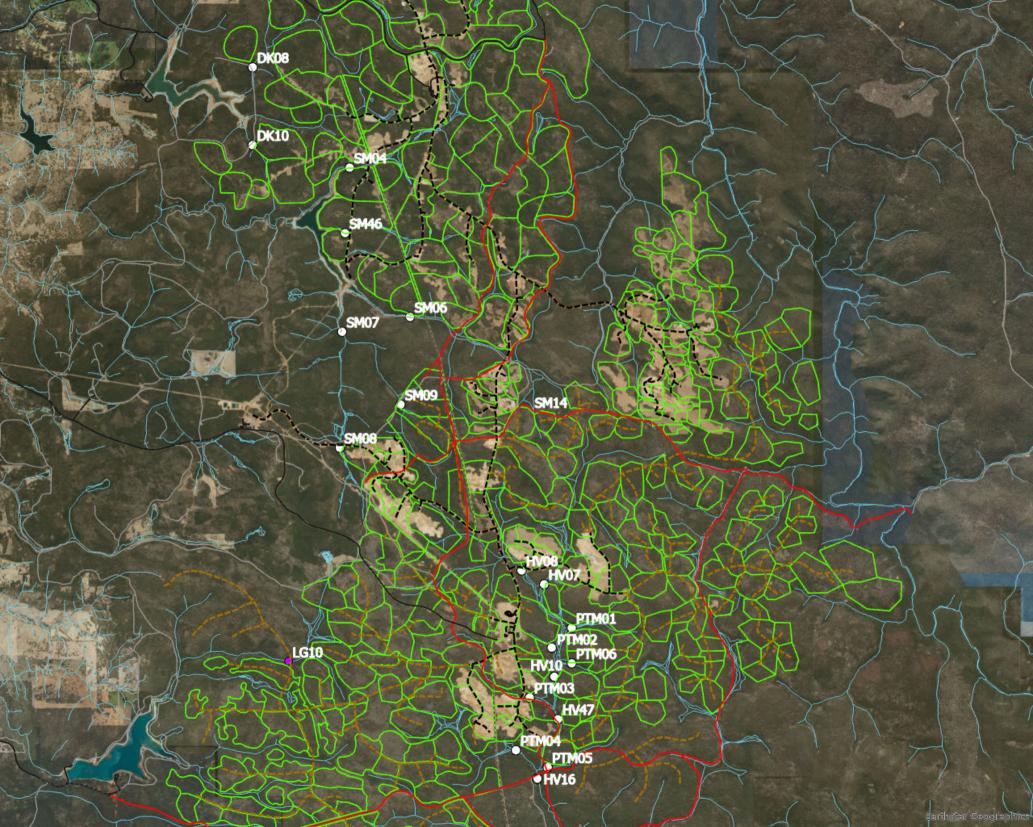


Date	Willowdale WQMS Data - January 2024 - Turbidity (Daily Average, NTU) HV07
1/01/2024	4.5
2/01/2024	5.2
3/01/2024	4.6
4/01/2024	4.7
5/01/2024	4.6
6/01/2024	4.5
7/01/2024	4.4
8/01/2024	4.5
9/01/2024	4.6
10/01/2024	5.4
11/01/2024	4.6
12/01/2024	4.7
13/01/2024	4.5
14/01/2024	4.7
15/01/2024	4.6
16/01/2024	3.6
17/01/2024	3.7
18/01/2024	4.5
19/01/2024	4.4
20/01/2024	6.1
21/01/2024	7.0
22/01/2024	6.2
23/01/2024	
24/01/2024	
25/01/2024	
26/01/2024	
27/01/2024	
28/01/2024	
29/01/2024	
30/01/2024	
31/01/2024	

hntNote: Daily averages above 25 NTU have been annotated by black bold text. Daily averages inclusive of with true events for further investigation are annotated by red bold text. Grey shading indicates no data available for that day at that unit.



# Appendix A. Willowdale WQMS Locations





# Appendix B. WQMS General Arrangement

