

# **Amendment Report**

## **Application for Licence Amendment**

#### Part V Division 3 of the Environmental Protection Act 1986

Licence Number	L4201/1991/11	
Licence Holder	Water Corporation	
ACN	28 003 434 971	
File Number	DEC6295/3	
Premises	Woodman Point Wastewater Treatment Plant Lot 9 Cockburn Road MUNSTER WA 6166 Legal description –	
	Being part of Lot 9 on Diagram 31097 As defined by the coordinates in Schedule 2 of the Revised Licence	
Date of Report	08/02/2022	
Decision	Revised licence granted	

#### MANAGER WASTE INDUSTRIES REGULATORY SERVICES

an officer delegated under section 20 of the Environmental Protection Act 1986 (WA)

## **Table of Contents**

1.	Decision summary1					
2.	Scope of assessment					
	2.1	Regulatory framework1				
	2.2	Application summary1				
	2.3	Part IV of the EP Act1				
	2.4	Administrative changes2				
3.	Risk a	assessment2				
	3.1	Source-pathways and receptors2				
		3.1.1 Emissions and controls				
		3.1.2 Receptors				
	3.2	Risk ratings6				
4.	Consu	ultation9				
5.	Concl	usion9				
	5.1	Summary of amendments				
Refe	rences	s15				
		I: Summary of Licence Holder's comments on risk assessment and tions16				
Appe	endix 2	2: Application validation summary17				
Table	e 1: Lice	ence Holder controls2				

	~
Table 2: Sensitive human and environmental receptors and distance from prescribed activity.	4
Table 3. Risk assessment of potential emissions and discharges from the Premises during construction, commissioning and operation	.7
Table 4: Consultation	9
Table 5: Consolidation of licence conditions in this amendment	9

Figure 1: Prescribed premises (pink) in relation to sensitive commercial/industrial receptors
(red) and sensitive residential receptors (green)5

## 1. Decision summary

Licence L4201/1991/11 is held by the Water Corporation (Licence Holder) for the Woodman Point Wastewater Treatment Plant (the Premises), located at on Part of Lot 9 Cockburn Road, Munster.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the construction and operation aspects of the proposal. As a result of this assessment, Revised Licence L4201/1991/11 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

## 2. Scope of assessment

#### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the Department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <a href="https://dwer.wa.gov.au/regulatory-documents">https://dwer.wa.gov.au/regulatory-documents</a>.

#### 2.2 Application summary

On 1 July 2021 the Licence Holder submitted an application to the department to amend Licence L4201/1991/11 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

Construction, installation, commissioning and operation of:

- A third Dissolved Air Flotation Treatment (DAFT) tank; and
- Hoppers and pumps for the existing Rotary Screw Thickeners (RST).

These interim infrastructure upgrades will increase the current digester capacity. This is required to ensure the facility can cope with the maximum solids production prior to major infrastructure and capacity upgrades, scheduled for 2024.

The proposed works are expected to commence in March 2022 and be completed by March 2023 inclusive of commissioning.

The applicant has advised that all emissions and discharges relating to this proposal are not expected to be significant and can be managed through normal contractor management processes including the development and implementation of a construction and environmental management plan.

#### 2.3 Part IV of the EP Act

The Premises is subject to Ministerial Statement 665, which specifies criteria for wastewater discharge to the Sepia Depression via the Sepia Depression Ocean Outlet Landline.

Ministerial Statement 665 is not impacted by the proposed works and has thus not been considered in this assessment.

## 2.4 Administrative changes

As part of this amendment package, the Department has incorporated several administrative changes to the licence. The Department has not undertaken any additional risk assessment of the Premises related to these changes.

In updating the Licence, the CEO has:

- updated the format and appearance of the Licence;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of licence conditions as they relate to this Revised Licence are detailed in Section 5.1. Previously issued Amendment Notices will remain on the Department's website for future reference and will act as a record of the Department's decision making.

The Delegated Officer understands that there may be some other outdated conditions remaining in the Licence. If the Licence Holder would like to request the change or removal of any other conditions, it is encouraged that this be addressed in a future Licence amendment application accompanied by the relevant supporting information.

## 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk* assessments (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

#### 3.1 Source-pathways and receptors

#### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Emission	Sources	Potential pathways	Proposed controls
Construction			
Odour	Interruption of treatment process to upgrade and install new infrastructure	Air/windborne pathway	<ul> <li>A Construction Environmental Management Plan (CEMP) will be prepared prior to construction.</li> </ul>
Noise	Civil and construction works to facilitate modifications.	Air/windborne pathway	Compliance with the Environmental Protection (Noise) Regulations 1997.

 Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls						
Leachate	Unplanned leaks or spills due to equipment failure	Seepage to ground and groundwater	<ul> <li>Spill response and clean-up to be included in the CEMP.</li> </ul>						
Commissioning and Operation									
Odour	Interruption of treatment process to upgrade and install new infrastructure	Air/windborne pathway	• The Odour Control Facility's (OCF) existing 2x duty fans and biotrickling filters have been calculated to have sufficient capacity to accommodate the third DAFT and treat the additional air flows. No increase in odour emissions is expected from the installation of the thickened raw primary sludge (TRPS) hoppers and transfer pumps or during commissioning activities.						
Noise	Testing and operational activities	Air/windborne pathway	<ul> <li>Compliance with the <i>Environmental</i> <i>Protection (Noise) Regulations 1997.</i></li> <li>Existing operational controls consistent with Licence L4201/1991/11.</li> <li>Proposed works are unlikely to change the existing operational noise profile of the site.</li> </ul>						
Leachate	Unplanned leaks or spills due to equipment failure Hydrocarbon and chemical spills	Overland flow and infiltration to soil and groundwater	<ul> <li>Online commissioning will include monitoring for leaks and join failures.</li> <li>Standard chemical and hydrocarbon management controls will be included in the CEMP.</li> <li>Existing operational controls consistent with Licence L4201/1991/11.</li> </ul>						
	Discharge of treated wastewater	Direct discharge through the Sepia Depression Ocean Outlet Landline	• The Sepia Depression Ocean Outlet Landline (SDOOL) transfers treated wastewater from the premises to the Sepia Depression. The treated wastewater quality discharged from the premises both during construction and during operation of the upgraded plant is expected to remain as per the current situation (with improvements expected long-term) and will not exceed the discharge loads to the ocean required by Ministerial Statement 665 or the licence.						

#### 3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment.

Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

 Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from activity / prescribed premises			
Various commercial/industrial premises (Henderson)	Adjacent to the southern boundary of the prescribed premises			
Residential premises (Munster)	≈ 500 m east of the prescribed premises boundary			
Woodman Point Holiday & Caravan Park	≈ 580m north-west of the prescribed premises boundary			
Residential premises (Coogee)	≈ 870m north of the prescribed premises boundary			
Environmental receptors	Distance from activity / prescribed premises			
Cockburn Groundwater Area	Located within this groundwater area			
Geomorphic Wetlands – Lake Coogee	Adjacent to the eastern boundary of the prescribed premises			
Jervoise Bay Cove	≈ 250 m west of the prescribed premises boundary			
Geomorphic Wetlands – Anderson Road Swamp, Little Henderson North & Brownman Swamp	o, ≈ 610 m south-west of the prescribed premises boundary			
Bush Forever areas	Adjacent to the north-west and eastern boundary of the prescribed premises			
DBCA Legislated Tenure – Conservation Park	≈ 360m north-west of the prescribed premises boundary			
Threatened and Priority Flora ( <i>Dodonaea Hackettiana</i> )	Specimen recorded within 2 km of the northern premises boundary			
Threatened and Priority Fauna (13 species)	Specimens located within 2 km surrounding the prescribed premises boundary			
Underlying groundwater	Due to the varying topography at the prescribed premises, the Perth Groundwater Map indicates depth to groundwater between 7 to 31 mbgl. Groundwater salinity is mapped at 1000-1500 mg/L. TDS is mapped at 500-1000.			

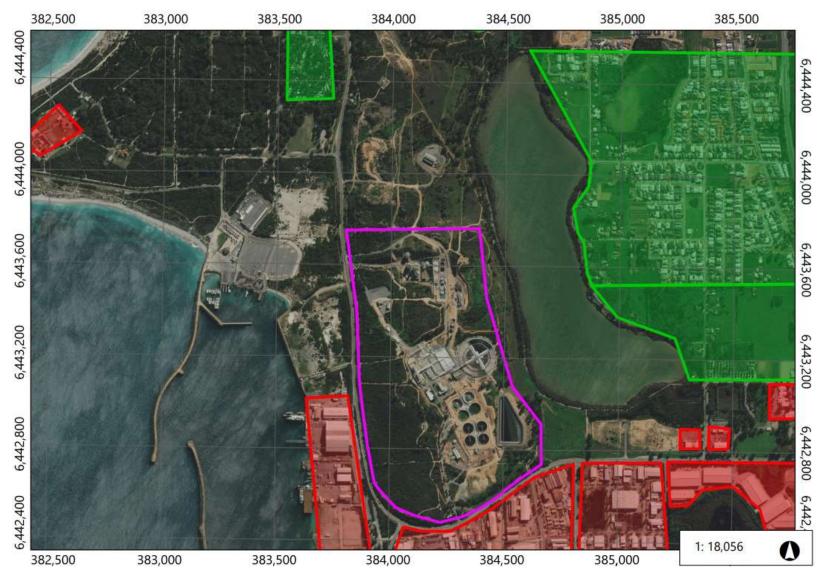


Figure 1: Prescribed premises (pink) in relation to sensitive commercial/industrial receptors (red) and sensitive residential receptors (green)

Licence: L4201/1991/11

#### 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the Licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Licence L4201/1991/11 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

The conditions in the Revised Licence have been determined in accordance with Guidance Statement: Setting Conditions (DER 2015).

Risk Event					Risk rating <sup>1</sup> Licence			
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood	Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Construction and Insta	allation	_		-			-	
	Odour	Air/windborne pathway causing	Residences 500m north- east, 580m north-west and		C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 1, 10, 11, 18, 25, 37	The applicant has committed to implementing a Construction Environmental Management Plan (CEMP) to address the potential for odour emissions and provide mitigation measures during construction and installation.
Installation of thickened raw primary sludge (TRPS) hoppers and transfer pumps Construction and installation of Dissolved Air Flotation Thickening (DAFT) tank	Noise	impacts to health and amenity	870m north Adjacent commercial receptors	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 10, 11, 37	The applicant has committed to having a CEMP to address the potential for noise emissions and provide mitigation measures during construction and installation. Premises operations are subject to the <i>Environmental Protection (Noise) Regulations</i> <i>1997.</i>
	Wastewater spills and discharge Hydrocarbon and chemical spills	Overland flow and infiltration to soil and groundwater	Cockburn Groundwater Area Lake Coogee		C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Condition 10, 11	The applicant has committed to having a CEMP to respond to potential spills and its clean-up and provide mitigation measures during construction and installation. Minor hydrocarbon and chemical spillages are adequately regulated under the general provisions of the EP Act and the <i>Environmental</i> <i>Protection (Unauthorised Discharges)</i> <i>Regulations 2004.</i>

## Table 3. Risk assessment of potential emissions and discharges from the Premises during construction, commissioning and operation

Licence: L4201/1991/11

Risk Event	Risk Event					Licence		
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	Risk rating <sup>1</sup> C = consequence L = likelihood	Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Commissioning and O	peration							
Operation of thickened raw primary sludge (TRPS) hoppers and transfer pumps	Noise	Air/windborne pathway causing impacts to	Residences 500m north- east, 580m north-west and 870m north	n north- , 580m n-west and n north icent mercial	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 10, 11, 37	As the proposed infrastructure upgrades are not expected to significantly change the noise profile of the premises, the Delegated Officer considers the current Licence's regulatory controls sufficient. Premises operations are subject to the <i>Environmental Protection (Noise) Regulations</i> 1997.
	Odour	health and amenity	Adjacent commercial receptors		C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Condition 10, 11, 17, 18, 22, 23, 25, 30, 37	The Delegated Officer notes that the applicant expects odour emissions to increase by ~2,700m <sup>3</sup> /hour, however the odour control facility currently installed at the premises has sufficient capacity to manage this increase. Therefore, the Delegated Officer considers the current Licence's regulatory controls sufficient in managing odour emissions.
Operation of Dissolved Air Flotation Thickening (DAFT) tank	Wastewater spills and discharge Hydrocarbon and chemical spills	Overland flow and infiltration to soil and groundwater Direct discharge through the Sepia Depression Ocean Outlet Landline causing ecosystem disturbance	Cockburn Groundwater Area Lake Coogee Jervoise Bay approximately 250 m to the west	3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Condition 10, 11, 20, 24, 31	The operation of the proposed infrastructure does not alter the risk as previously assessed for equivalent infrastructure for Licence L4201/1991/11. Minor hydrocarbon and chemical spillages are adequately regulated under the general provisions of the EP Act and the <i>Environmental</i> <i>Protection (Unauthorised Discharges)</i> <i>Regulations 2004.</i> The proposed works are not expected to adversely impact the current quality of treated wastewater. The existing conditions of Licence L4201/1991/11 and the discharge requirements of Ministerial Statement 665 provide sufficient control to mitigate the potential for adverse emissions through wastewater discharge to the Sepia Depression.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Guideline: Risk assessments (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. <u>Bold and underline text</u> depicts additional regulatory controls imposed by department. Licence: L4201/1991/11

## 4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

#### Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the Department's website (13/08/2021- 03/09/2021)	None received.	N/A
Local Government Authority advised of proposal on 13/08/2021	The City of Cockburn replied on 18/08/2021 confirming that the City has no objections or further comments to this proposal.	Noted.
Licence Holder was provided with draft amendment on 05/11/2021	Refer to Appendix 1.	Refer to Appendix 1.

## 5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

#### 5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 5: Consolidation of licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	N/A	N/A	Licence history table included into the Licence.
1.1.1 1.1.2	Interpretation and definitions	N/A Interpretation section, Definitions moved into Table 16	Redundant conditions. Revised to current licensing format. New terms added to the definitions table.
1.1.3	Australian or other standard	N/A Interpretation section	Redundant condition. Revised to current licensing format.
1.1.4	Reference to code of practice	N/A Interpretation section	Redundant condition. Revised to current licensing format.

Existing condition	Condition summary	Revised licence condition	Conversion notes
1.2.1	Pollution control and monitoring equipment	Condition 1	New numbering.
1.2.2	Spills recovery	N/A	Redundant condition. Adequately covered by the <i>Environmental</i> <i>Protection (Unauthorised</i> <i>Discharges) Regulations 2004.</i> Deleted from Licence.
1.2.3 Table 1.2.1	Construction requirements	N/A	Stage 1A works (items 6 – 10) have been completed as per Water Corporation
1.2.4	Works specifications		Construction Compliance Document 193952841
1.2.5	Works departures from specifications		(A1689762). Stage 1b, 2 & 3 works have been completed as per Water Corporation Construction Compliance
Table 1.2.2	Works specifications		Document 99516211 (DWERDT395916).
1.2.6	Construction and installation deviation		Commissioning reports provided by Water Corporation on 21/12/2020 (A1987535).
1.2.7	Construction compliance document		Environmental Compliance Report Assessment completed by DWER (A1987533).
1.2.8	Construction compliance document requirements		Submissions acknowledged by DWER in letters dated 12/06/2018 (A1690387) and 23/03/2021 (A1990929).
1.2.9	Premises sewage operation limits		These items have been removed from Table 1.2.2 and added into the containment infrastructure table (Table 4) accordingly.
N/A	Design and construction/installation requirements	Condition 2 Table 1	New standard works condition and table detailing the proposed design and construction requirements for:
			<ul> <li>Four dedicated thickened raw primary sludge hoppers and pumps.</li> </ul>
			Third dissolved flotation thickening tank.
N/A	Construction Environmental Management Plan (CEMP)	Condition 3	New standard condition requiring submission of a CEMP as proposed by the applicant prior to commencing construction activities.

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	CEMP minimum requirements	Condition 4	New standard condition specifying the minimum details required in the submission of the CEMP as per the applicant's application.
N/A	Environmental compliance report	Condition 5	New standard condition to ensure DWER is notified once the proposed works have been completed.
N/A	Environmental compliance report requirements	Condition 6	New condition to ensure all construction and installation works are appropriately checked and signed off by a suitably qualified person once completed.
1.3.1 Table 1.3.1	Waste acceptance	Condition 7 Table 2	New numbering.
1.3.2	Non-conforming waste	Condition 8	New numbering.
1.3.3 Table 1.3.2	Waste processing	Condition 9 Table 3	New numbering.
1.3.4 Table 1.3.3	Containment infrastructure	Condition 10 Table 4	<ul> <li>Table has been updated with:</li> <li>Installed infrastructure and related requirements as per the completion of Water Corporations Stage 1A works.</li> <li>Addition existing infrastructure - dissolved air flotation thickening tanks and rotary screw thickeners.</li> </ul>
1.3.5 Table 1.3.4	Management actions	Condition 11 Table 5	New numbering.
1.3.6	Restarting operations requirements	Condition 12	New numbering.
1.3.7	Wastewater treatment vessel management	Condition 13	New numbering.
1.3.8	Security measures	Condition 14	New numbering.
1.3.9	Odour verification	Condition 15	New numbering

Existing condition	Condition summary	Revised licence condition	Conversion notes
2.1.1	Record and investigate exceedances of limits or targets	N/A	Redundant condition. Deleted from Licence.
2.2.1 Table 2.2.1	Emission points to air	Condition 16 Table 6	New numbering.
2.3.1 Table 2.3.1	Emission points to surface water	Condition 17 Table 7	New numbering.
2.4.1 Table 2.4.1	Management plans	Condition 18 Table 8	New numbering.
3.1.1	Sampling requirements	Condition 19	New numbering.
3.1.2	Monitoring frequency	Condition 20	New numbering.
3.1.3	Monitoring equipment calibration	Condition 21	New numbering.
3.1.4	Calibration reporting.	Condition 22	New numbering.
3.2.1 Table 3.2.1	Monitoring of point source emissions to air	Condition 23 Table 9	New numbering.
3.3.1 Table 3.3.1	Monitoring of point source emissions to surface water	Condition 24 Table 10	New numbering.
3.4.1 Table 3.4.1	Monitoring of inputs and outputs	Condition 25 Table 11	New numbering.
3.5.1 Table 3.5.1	Process monitoring	Condition 26 Table 12	New numbering.
4.1.1	Record-keeping	Condition 27	Condition updated into the new Licence format with additional standard record- keeping requirements.
N/A	Records	Condition 28	New standard records requirements condition added to Licence.

Existing condition	Condition summary	Revised licence condition	Conversion notes
4.1.2	Annual Audit Compliance Report	Condition 29	Condition updated into new format. To provide reporting clarity, a submission deadline date has been specified as per the AER submission requirement – 1 September.
4.1.3	Complaints management	Condition 30	New numbering.
4.2.1 Table 4.2.1	Annual Environmental Report (AER)	Condition 31 Table 13	New numbering.
4.2.2	Additional AER information requirements	Condition 32	New numbering.
4.2.3 Table 4.2.2	Non-annual reporting requirements	Condition 33 Table 14	New numbering.
4.3.1 Table 4.3.1	Notification requirements	Condition 34 Table 15	New numbering.
Schedule 1: Maps	Premises map Map of site layout Premises map of discharge pipeline Map of proposed works upgrade to the Premises Map of WWTP emission and monitoring points Map of odour control facility emission and monitoring points Map of tanker receival facility emission point	Premises map (Figure 1) Map of site layout (Figure 2) Premises map of discharge pipeline (Figure 3) Map of WWTP emission and monitoring points – primary treatment (Figure 4) Map of WWTP emission and monitoring points – secondary treatment (Figure 5) Process flow of WWTP emission and monitoring points – solids treatment (Figure 6)	All figures have been given figure numbers. Figure 2 has been updated with a current site map listing the onsite infrastructure. The map of proposed works upgrade to the Premises has been removed from the licence as these works have now been completed. A process flow with emission and monitoring points for solids treatment has been added into the Licence (Figure 7). An interim process flow for solids treatment has been added into the Licence (Figure 8). The proposed installation model showing the hopper and pump under each rotary screw thickener has been added into the Licence (Figure 11).

Existing condition	Condition summary	Revised licence condition	Conversion notes
		Proposed interim process flow for solids treatment (Figure 7)	The proposed installation model showing the third dissolved air flotation tank and
		Map of odour control facility emission and monitoring points (Figure 8)	ancillary equipment has been added into the Licence (Figure 12).
		Map of tanker receival facility emission point (Figure 9)	
		Installation model of thickened raw primary sludge hopper and pump under each rotary screw thickener (Figure 10)	
		Installation model of third dissolved air flotation thickening tank and ancillary equipment (Figure 11)	
Schedule 2: Premises boundary	Premises boundary coordinates	Table 17	Premises boundary coordinates have been converted into GDA2020. The Hazer CDP exclusion area coordinates were not in the correct order – this has been corrected.
Schedule 3: Prescribed Premises Category	Prescribed premises category table	N/A	This prescribed premises category has been relocated onto the front page of the Licence.
Schedule 4: Notification and forms	N1 Form	Schedule 3: N1 Notification Form	New schedule number.

## References

- 1. DER July 2015. *Guidance Statement: Regulatory principles*. Department of Environment Regulation, Perth. Accessed at <u>www.dwer.wa.gov.au</u>
- 2. DER, October 2015. *Guidance Statement: Setting conditions*. Department of Environment Regulation, Perth. Accessed at <u>www.dwer.wa.gov.au</u>
- 3. DER, August 2016. *Guidance Statement: Licence duration*. Department of Environment Regulation, Perth. Accessed at <u>www.dwer.wa.gov.au</u>
- 4. DER, November 2016. *Guidance Statement: Environmental Siting*. Department of Environment Regulation, Perth. Accessed at <u>www.dwer.wa.gov.au</u>
- 5. DER, February 2017. *Guidance Statement: Risk Assessments*. Department of Environment Regulation, Perth. Accessed at <u>www.dwer.wa.gov.au</u>
- 6. DWER, June 2019. *Guideline: Decision Making*. Department of Water and Environmental Regulation, Perth. Accessed at <u>www.dwer.wa.gov.au</u>
- 7. DWER, June 2019. *Guideline: Industry Regulation Guide to Licensing*. Department of Water and Environmental Regulation, Perth. Accessed at <u>www.dwer.wa.gov.au</u>

# Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition and/or table	Summary of Licence Holder's comment	Department's response
Former condition 2, Table 1 (in 1 <sup>st</sup> draft)	Table 1 should be updated to reflect this licence amendment submission elements of previous applications.	The Delegated considers the construction requirements stipulated in this document have now been completed and therefore this condition and table has been removed from the licence. Correspondence to this effect was sent to the Water Corporation on 12/06/2018 (A1690387) and 23/03/2021 (A1990929).
Former condition 3 to condition 8 (in 1 <sup>st</sup> draft)	Remove all work specifications related to previous Amendment licence L4201/1991/1 Woodman Point Wastewater Treatment Plant 180ML/d Upgrade for Stages 1b, 2 and 3.	The Delegated Officer considers the removal of these conditions acceptable as all required environmental compliance and commissioning reports have been submitted to DWER. See comment above also.
Former condition 9, Table 3 (in 1 <sup>st</sup> draft). Condition 2, Table 1 in the 2 <sup>nd</sup> draft.	Pipe diameter references should be removed and the second dot point may be modified to read "New pipework between rotary screw thickeners and existing digesters to be installed"	The Delegated Officer considers the stipulation of specific pipework material unnecessary and has replaced these requirements with outcome-based conditions to ensure appropriate materials are used and necessary testing is completed to ensure the infrastructure is fit for purpose.
Condition 6	This condition references the infrastructure in condition 1 however it should reference condition 2.	The Delegated Officer considers this an error and has corrected this to reference condition 2.

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)						
Application type						
Works approval						
		Relevant works approval number:		None		
		Has the works appro with?	Has the works approval been complied with?		No 🗆	
Licence		Has time limited operations under the works approval demonstrated acceptable operations?		Yes 🗆	No 🗆 N/A 🗆	
		Environmental Com Critical Containmen Report submitted?		Yes □	No 🗆	
		Date Report receive	ed:			
Renewal		Current licence number:				
Amendment to works approval		Current works approval number:				
A		Current licence number:	L4201/1991/11			
Amendment to licence	$\boxtimes$	Relevant works approval number:		N/A		
Registration		Current works approval number:		None		
Date application received		01 July 2021				
Applicant and Premises details						
Applicant name/s (full legal name/s)		Water Corporation				
Premises name		Woodman Point Wastewater Treatment Plant				
Premises location		Part Lot 9 on Diagram 31097				
Local Government Authority		Cockburn Road				
Application documents						
HPCM file reference number:	DEC6295/3					
Key application documents (additional to application form):		CS03684 Woodman Point WRRF Interim Sludge Treatment Upgrade Licence Amendment (L4201/1991/11) Application Supporting Information document				

Scope of application/assessment				
Summary of proposed activities or	<ul> <li>Construction, installation, commissioning and operation of:</li> <li>A third Dissolved Air Flotation Treatment tank; and</li> <li>Hoppers and pumps for the existing Rotary Screw Thickeners.</li> <li>These interim infrastructure upgrades will increase the current digester capacity. This is required to ensure the facility can cope with the maximum solids production prior to major infrastructure</li> </ul>			
changes to existing operations.	and capacity upgrades, scheduled for 2024. The proposed works are expected to commence in March 2022 and be completed by March 2023 inclusive of commissioning.			
	The applicant has advised that all emissions and discharges relating to this proposal are not expected to be significant and can be managed through normal contractor management processes including the development and implementation of a construction and environmental management plan.			

## Table 1: Prescribed premises categories

Prescribed premises category and description			Assessed production or design capacity	
Category 54: Sewage facility: premises – a. On which sewage is treated (excluding septic tanks); or b. From which treated sewage is discharged onto land or into waters.			180,0	000 cubic metres per day
Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.			50,00	00 tonnes per annual period
egislative context and other approvals				
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes 🗆	No 🖂		Referral decision No: <u>N/A</u> Managed under Part V □ Assessed under Part IV □
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes 🛛	No 🗆		Ministerial statement No: <u>665</u> EPA Report No: <u>Bulletin 1135</u>
Has the proposal been referred and/or assessed under the EPBC Act? Yes □ N		No 🛛		Reference No: <u>N/A</u>
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes ⊠	No 🗆		Certificate of title General lease Mining lease / tenement Expiry: Other evidence Expiry: <u>Water Corporation listed as</u> proprietor of this land parcel.

Has the applicant obtained all relevant planning approvals?	Yes □ No □ N/A ⊠	Approval: <u>N/A</u> Expiry date: <u>N/A</u> <u>Water Corporation is exempt from</u> <u>the requirement to obtain</u> <u>development approval for this</u> <u>project under the City of Cockburn's</u> <u>local planning scheme and</u> <u>Metropolitan Region Scheme.</u>
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes 🗆 No 🛛	CPS No: <u>N/A</u> <u>No clearing is proposed.</u>
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes 🗆 No 🖂	Application reference No: <u>N/A</u> Licence/permit No: <u>N/A</u> <u>No clearing is proposed.</u>
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes 🗆 No 🖂	Application reference No: <u>N/A</u> Licence/permit No: <u>Licence / permit not required.</u>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes □ No ⊠	Name: N/A         Type: N/A         Has Regulatory Services (Water)         been consulted?         Yes □ No □ N/A ⊠         Regional office: N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes □ No ⊠	Name: $N/A$ Priority: P1 / P2 / P3 / $N/A$ Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes $\Box$ No $\Box$ N/A $\boxtimes$
Is the Premises subject to any other Acts or subsidiary regulations (e.g. Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx)	Yes 🗆 No 🗆	Environmental Protection (Controlled Waste) Regulations 2004.
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes 🗆 No 🗆	Premises is located within the State Environmental (SEP) Cockburn Sound 2005 Policy boundary.
Is the Premises subject to any EPP requirements?	Yes □ No ⊠	

Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?		A Notice of Classification by the DER for Lot 9 on Diagram 31097 dated 13 November 2013, as provided by the Corporation as part of the assessment, indicated that the Site was classified as 'potentially contaminated – investigation required' (PC-IR) based on information submitted in May 2007.
	Yes 🛛 No 🗆	The Sites PC-IR classification is understood to have been based on visual indications of cinder ash. It is understood that the cinder ash originated from the Fremantle Coke and Gas Works.
		However, during the development of the PSI (ERM, 2016), ERM noted that the cinder ash was only reported to be present within adjacent Lot 20, located to the north of Lot 9, and not related to the WRRF Site (Lot 9). This error was due to the WRRF being identified as Lot 20 in the initial investigation. It appears that contamination issues associated with the cinder ash should only be linked to Lot 20, and not to Lot 9 (the WRRF).