Amendment Report

Application for Licence Amendment

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

Licence Number	L8811/2014/1
Licence Holder	Edna May Operations Pty Ltd
ACN	136 365 001
File Number	DER2014/000639-1 FA259717
Premises	Edna May Village Wastewater Treatment Plant Wolfram Street WESTONIA WA 6437 Legal description – Lot 500 on Plan 58086 As defined by the Premises maps attached to the Revised Licence
Date of Report	17 December 2021
Proposed Decision	Revised licence granted

Steve Checker

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Date: 2021.12.17 13:38:38 +08'00'

Steve Checker
MANAGER WASTE INDUSTRIES
REGULATORY SERVICES

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

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1. Decision summary

Licence L8811/2014/1 is held by Edna May Operations Pty Ltd (Licence Holder) for the Edna May Village Wastewater Treatment Plant (the Premises), located at Lot 500 on Plan 58086, Wolfram Street, WESTONIA, WA, 6437.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during operation of the Premises. As a result of this assessment, Revised Licence L8811/2014/1 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 https://dwer.wa.gov.au/regulatory-documents.

2.2 Application summary

On 26 August 2021, the Licence Holder submitted an application to the department to amend Licence L8811/2014/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Convert existing sludge tank into a fourth Sequence Batch Reactor (SBR) Tank; and
- Installation of a 32,000 L Holding Tank on a new concrete pad immediately to the north of the existing infrastructure.

The daily influent volume is not expected to change and should remain between 25,000 to 30,000 L /day which is below the approved limit of the current licence (100 cubic metres per day). No changes to the licences assessed production capacity is proposed.

The current WWTP has a maximum operating capacity of 45 kL-55 kL per day. This capacity is comprised of 3 x SBR Tanks each able to process 8 kL per 12hrs.

The current WWTP is limited due to the holding capacity of the collection pit. During peak times the optimal process time may not be achieved.

A proposed new expansion will add another SBR Tank to the system, adding 6 kL per 12 hrs, and a Holding Tank that will have a capacity of 32 kL. The existing sludge tank will be converted to the 4th SBR tank. The Holding Tank will allow more control of the process times and any additional time needed for Anoxic or Denitrification, if required. The Holding tank will be installed on a new concrete pad (6.5 x 6.5 m) to the North of the current tanks, with the concrete bund extended to include the new tank.

The upgraded WWTP system will consist of a collection pit, anaerobic tank (holding tank), 4x SBR tanks, intermediate polishing tank, filtration system, irrigation tank and irrigation system.

Collection Pit

The Collection Pit is the first collection point for wastewater. Wastewater is gravity fed from the village ablutions and kitchen, through a Rotary Screen that removes larger solids from the water, preventing pump and filter blockages. The pit is fitted with two stainless steel grinder sump

pumps which are controlled by level sensors. When the water level in the pit is above a pre-determined LO level the duty sump pump will turn on and transfer wastewater from the pit into the Anaerobic Tank (Holding Tank) or directly into the SBR Tanks 1, 2, 3, & 4 if available. When the level is below the sump LO level, duty pump will turn off to prevent damage to the pump.

If the level in the pit rises to a pre-determined HI level, both pumps will operate until the LO level point is reached, at which point both pumps will turn off.

Inflow to the SBR Tanks & Holding Tank is monitored and recorded by Magnetic Flowmeter. If the duty sump pump is operating and no flow is detected, stand-by sump pump will assume the duties until the sump LO level is reached. Any no flow condition will raise an alarm that will remain on until the 'RESET ALARMS' button on the HMI is pressed.

Anaerobic tank/ Holding tank

From the collection pit, wastewater will enter the Holding Tank. This tank will act as an anaerobic tank. Denitrification will take place (NO_3 to N_2 gas) and provide the required conditions by which microorganisms break down biodegradable material in the absence of oxygen. The Holding tank will also receive returned activated sludge from the 4 x SBR tanks. The Holding tank allows storage of influent so that optimum process times can occur at each of the SBR tanks.

SBR Tanks

From the Collection Pit or Holding Tank, wastewater enters to the 4 x SBR tanks in parallel. The 4 tanks are fitted with duty/stand by aerators/blowers that are intermittently turned on and off to promote Oxygen & Anoxic environment. Tanks are also dosed with flocculant to aid in the settling/removal process.

During the aeration phase (blower/aerator on), the BOD and SS concentrations are reduced by oxidation, and Nitrification takes place (NH_4 to NO_3).

The SBR Tanks are sized to accommodate the requisite volume required to treat the incoming organic (BOD) load. Micro-organisms in the tank remove organic material from the wastewater. Blower/aerators supply a high volume of air to the base of the tank which provide oxygen for the biological process and facilitate recirculation of the wastewater undergoing treatment of the entire volume of the tank.

During the anoxic phase (blower/aerator off), Denitrification takes place (NO_3 to N_2 gas) and provide the required conditions by which microorganisms break down biodegradable material in the absence of oxygen. The digestion process begins with bacterial hydrolysis of the input materials. Anaerobic digestion also reduces the emission of landfill gas into the atmosphere.

Additionally, larger solids will settle to the bottom of the tanks, forming a 'crust' of organic material that will be periodically removed to the Holding Tank. The Holding Tank is fitted with a valve and camlock fitting to aid in sludge removal via 'Sucker Truck'.

SBR tanks are fitted with pressure sensors that estimates water level at the tank, at a specific set point, water is transferred by pumps into the Polish Tank and through 2 x basket strainers that again filter out any remaining larger particles.

Intermediate polishing tank

When entering the Polishing Tank, the wastewater is injected with liquid chlorine for disinfection purposes. The Polishing Tank stores water from SBRs ready for filtration. An ultrasonic level sensor fitted to the tank, controls the operation of filtration or 'polishing' pumps.

When the level in the tank is above a pre-determined LO level the duty polishing pump will turn on and pump water through the Filtration system. When the level is below the tank LO level pump will turn off to prevent damage to the pump. If the level in the Tank rises to a pre-determined HI level, both pumps will operate until the LO level point is reached, at which point both pumps will turn off. A portion of water from the Filtration system is returned to the Polishing Tank for further filtration.

Filtration System

The Filtration System is located in the Sea Container control room. High volume circulation pumps, deep bed media filters, cartridge filters and chlorine are used to remove any finer solids not captured in the SBR tanks settling period.

With the water level below the LO level in the Polish Tank, the Filtration pumps will not attempt to run to prevent damage to the pumps. If the water level in the Polish tank is above the pre-determined LO level, the duty filtration pump will turn on.

If a 'NO Flow' condition occurs at the Filtration Flowmeter after 10 seconds of duty pump operation, or if an overload occurs with the Duty pump, the Stand-by pump will be switched on and the alarm will be set to alert operators of the problem. The alarm will remain on until the 'RESET ALARMS' button on the Human Machine Interface (HMI) is pressed.

The Stand-by pump will act as the Duty pump until the overload is reset. The Duty pump will attempt to run again and if successful the system will carry on as per normal operation. If not successful, the Stand-by pump will again resume the duties of the Duty pump and the alarm condition remain on. All overload conditions should be investigated by an electrician.

The deep bed media filters are fitted with automatic backwash valves that can be set to operate at a selected period and interval via the touch screen HMI. Backwash from the filters is returned to a Sump Pit to be recycled back into the WWTP process.

After passing through the media filters, the water then passes through a bank of 3 x 1 micron cartridge filters and through a Turbidity/pH and Chlorine analyser to corroborate quality of treated water before entering the final Irrigation Tank.

Irrigation Tank

The final Irrigation tank holds treated water for use in the Irrigation system. The tank is fitted with an ultrasonic level sensor (P10) to control Irrigation pump (M19/20). Before final discharge, water passes through an ultimately filtration (1 x 1 micron cartridge filter) and disinfection using UV sterilizer.

Irrigation System

The Irrigation system is controlled via the ultrasonic level sensor (P10) located in the final irrigation tank. Once Irrigation is activated, at 75% Tank capacity, the liquor will pass through the Analyser to check its pH, Sanitation (CL2) and Turbidity (NTU) levels. Once this is within specified levels of operation the Irrigation valve system will switch over from secondary discharge area to the primary discharge area (Town Oval). Constant inline monitoring of the Irrigation will be taking place and if levels move outside of these levels, it will switch back to the secondary discharge area, checking every 5 minutes if it is suitable to return to Town Oval.

Disposal

The Disposal of treated water is managed as per the Shire of Westonia and Edna May Operations (EMO) RWQMP and the conditions of its approval (Approval number: E28/WS000). The Primary Discharge area is the town oval tank 1 with the water to be utilised for irrigation via sprinklers of the Westonia Town Oval. Discharge to the Town Oval tank will only occur if the treated water quality parameters meet the requirements outlined in the RWQMP. If the parameters are not within guidelines or there is no capacity at the town oval the treated water will be pumped to the secondary discharge area.

Currently the secondary discharge area is located adjacent to the WWTP. EMO are changing the secondary discharge area to Lot 1523. This will be completed as per the approved works approval W6480/2020/1. The premises is owned by EMO and is situated on the corner of the Carrabin-Westonia Road and Wolfram Street. The north-eastern corner of the property is approximately 900 m from the WWTP. An underground pipeline will be constructed to transfer the water to the secondary discharge area. Treated water will be discharged to the 1.25 ha area

via irrigation. The Department granted the application for a Works Approval to establish the discharge area on 10 May 2021. Construction of the pipeline and irrigation area are expected to be completed before October 2021. Once constructed EMO will apply for the area to be registered. The Department is currently assessing an amendment application for works approval W6480/2020/1.

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 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.

Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Conversion of existing sludge tank to a fourth Sequence Batch Reactor (SBR) Tank Installation of 32,000 L holding tank on a new concrete pad, extending the concrete bund.	Air/windborne pathway	No controls proposed for this amendment in relation to construction dust
Noise			No controls proposed for this amendment in relation to construction noise
Odour	Operation of updated WWTP system.		System alarms; inspections; fenced discharge area; existing licence controls
Spillage of sewage to land		Overflow flow, seepage and groundwater discharge	Bunded WWTP; System alarms; inspections; existing licence controls
Chemical spills		Breach of containment causing chlorine discharge to land	Bunded WWTP; system alarms; inspections; existing licence controls
Failure of disinfection system – treated wastewater containing harmful pathogens		Direct contact and ingestion of harmful pathogens.	System alarms; inspections; fenced discharge area; existing licence controls

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 prescribed activity
Nearest Residence	Approximately 40 m from the WWTP

The Westonia Caravan Park	Approximately 90 m from the WWTP
Westonia oval	Approximately 280 m from the WWTP
Environmental receptors	**Distance from prescribed activity**
Groundwater	Approximately 28-40 mbgl Westonia Groundwater Area - RIWI Proclaimed Groundwater Area
TEC – Wheatbelt Woodlands	WWTP sits within the buffer zone
Threatened fauna:	Within the premises boundary
Threatened flora	Multiple sightings within 500 m of the premises boundary

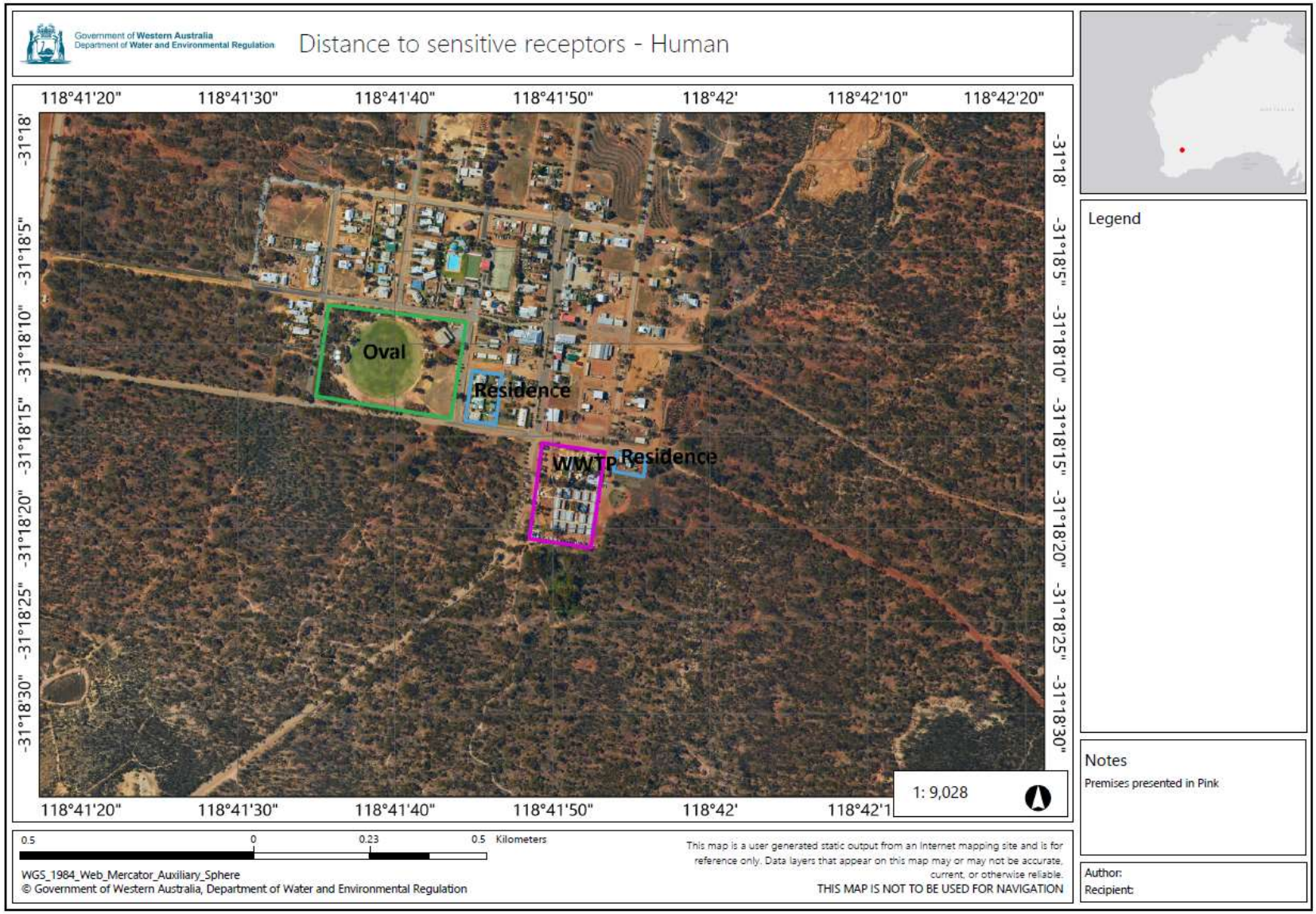

Figure 1: Distance to sensitive receptors – Human

Licence: L8811/2014/1

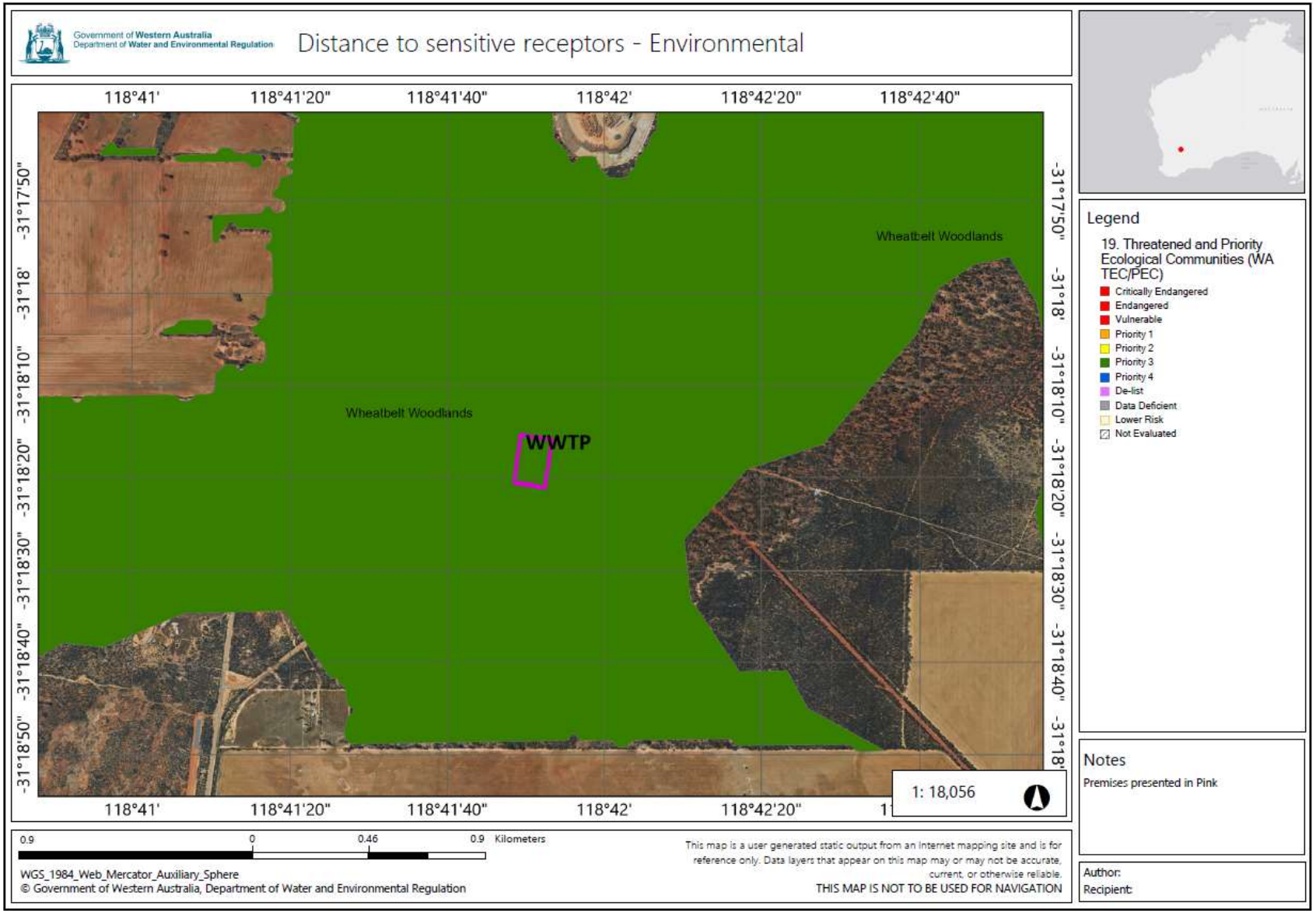

Figure 2: Distance to sensitive receptors – Human

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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 L8811/2014/1 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).

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

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
Construction								
Conversion of existing sludge tank to a fourth Sequence Batch Reactor (SBR) Tank Installation of 32,000 L holding tank on a new concrete pad	Dust	Air/windborne pathway causing impacts to health and amenity.	Nearest residences, the Westonia Caravan Park, and the Westonia Oval	Refer to Section 3.1	C = Slight L = Possible **Low Risk**	N	**Condition 12: ensures dust mitigation methods are implemented during construction**	The Delegated Officer considers the slight distance to sensitive receptors sufficient justification to include condition 12 to manage dust impacts.
	Noise				C = Slight L = Possible **Low Risk**	N	N/A	The Delegated Officer considers the risks of Noise impacts can be adequately managed under the *Environmental Regulations (Noise) 1997*
Operation								
Updated WWTP system Operation	Odour from storage and treatment of sewage	Air/windborne pathway causing impacts to health and amenity.	Nearest residences, the Westonia Caravan Park, and the Westonia Oval.	Refer to Section 3.1	C = Slight L = Possible **Low Risk**	Y	N/A	The Delegated Officer considers the risk of odour emissions from the upgraded WWTP does not change from the existing operations and can be managed under s.49 of the *Environmental Protection Act 1986*.
	Rupture of pipes /	Overland flow, seepage and	Nearest residences,		C = Slight	Y	Condition 10: ensures the WWTP is situated on a	The Delegated Officer considers the

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	overtopping of holding tanks resulting in sewage discharge to land	groundwater discharge resulting in soil contamination, reduction in groundwater quality and impacting upon dependent vegetation.	the Caravan Park, Groundwater, TECs and threatened flora		L = Unlikely **Low Risk**		bunded concrete hardstand.	bunded concrete hardstand adequate applicant control to manage any potential spills.
	Storage of chemicals	Breach of containment causing chlorine discharge to land.	Nearest residences, the Caravan Park, Groundwater, TECs and threatened flora		C = Slight L = Unlikely **Low Risk**	Y	Condition 10: ensures the WWTP is situated on a bunded concrete hardstand.	The Delegated Officer considers the bunded concrete hardstand adequate applicant control to manage any potential spills.
	Failure of disinfection system. Treated wastewater containing harmful pathogens	Human receptors at all WWTP facility coming in contact with the treated wastewater. Direct contact and ingestion of harmful pathogens. Pathogens in the wastewater may cause gastroenteritis, spread disease or create other public health impacts.	Nearest residences, the Caravan Park, Oval, Groundwater, and TECs		C = Slight L = Possible **Low Risk**	Y	Conditions 2-6: ensures monitoring of treated wastewater.	The Delegated Officer considers the bunded concrete hardstand adequate applicant control to manage any potential spills.

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. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal (15/11/2021)	N/A	N/A
DoH advised of proposal (15/11/2021)	Responded on 30/11/2021 with no objections to the proposal	N/A
Licence Holder was provided with draft amendment on 23/11/2021	Responded on 2/12/2021 requesting to waive the remaining comment period.	N/A

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: Summary of licence amendments

Condition no.	Proposed amendments
1	Condition added to include existing infrastructure and equipment requirements (moved from works table in existing licence)
7-10	Amended to authorise the construction/ installation of 4th SBR tank, holding tank and bunded concrete hardstand.
12	Condition added to ensure dust management practices are implemented during construction phase.

Table 6: Consolidation of licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition	Conversion notes
Definitions	Definitions	Definitions	Revised to current licensing format
Condition 1, Table 1	Effluent Discharge monitoring	Condition 6; Table 2	New numbering and revised to current licensing format.
Condition 2	Annual Environmental Report (AER)	Condition 13	New numbering and revised to current licensing format.

Existing condition	Condition summary	Revised licence condition	Conversion notes
Condition 3	Annual Audit Compliance Report (AACR)	Condition 14 - 17	New numbering and revised to current licensing format.
Condition 4	Discharges to land	N/A	Redundant condition. Revised to current licensing format.
Condition 5	AS 3565 – metering device	Condition 2	New numbering and revised to current licensing format.
Condition 6	Samples – AS 5667	Condition 3	New numbering
Condition 7	Samples – APHA-AWWA-WEF	Condition 4	New numbering
Condition 8	Samples – NATA	Condition 5	New numbering
Conditions 9-12	Works	Conditions 7 – 10 Condition 1	New numbering and revised to current licensing format, and updated to authorise new works. Completed works have been updated to Condition 1, Table 1 (Infrastructure and equipment requirements)
Condition 13, Table 4	Wastewater criteria	Condition 11, Table 4	New numbering
Schedule 1: Maps	Premises map	Schedule 1: Maps	Updated Map
Schedule 1: Maps	WWTP Process Schematic	WWTP Process Schematic	Updated Schematic

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)					
Application type					
Works approval	☐				
Licence	☐	Relevant works approval number:		None	☐
		Has the works approval been complied with?		Yes ☐ No ☐	
		Has time limited operations under the works approval demonstrated acceptable operations?		Yes ☐ No ☐ N/A ☐	
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?		Yes ☐ No ☐	
		Date Report received:			
Renewal	☐	Current licence number:			
Amendment to works approval	☐	Current works approval number:			
Amendment to licence	☒	Current licence number:	L8811/2014/1		
		Relevant works approval number:	W6480/2020/1 (amendment application currently being assessed)	N/A	☐
Registration	☐	Current works approval number:		None	☐
Date application received		26/8/2021			
Applicant and Premises details					
Applicant name/s (full legal name/s)		Edna May Operations Pty Ltd			
Premises name		Edna May Village Wastewater Treatment Plant			
Premises location		22 Wolfram Street Westonia WA 6423 Lot 500 on Plan 58086 Wolfram St Part of Reserve 49359			
Local Government Authority		Shire of Westonia			
Application documents					
HPCM file reference number:		DER2014/000639-1 - FA259717			

Key application documents (additional to application form):	Attachment 8D Location of new tank Attachment 2 WWTP Discharge areas Attachment 8B Certified Drawing_Rev0B Attachment 1A. Sublease Part of Reserve 49359 (Village) Attachment 3B Supporting Information Attachment 8C Processing Schematic Attachment 2 Premise Boundary L8811 Attachment 8A WWTP Design and company experience
Scope of application/assessment	
Summary of proposed activities or changes to existing operations.	Licence amendment Conversion of existing Sludge tank to fourth Sequence Batch Reactor Tank adding 6kL per 12 hours of treatment capacity. Installation of 32,000L Holding Tank to be installed on a new concrete pad immediately to the north of the existing infrastructure.

Category number/s (activities that cause the premises to become prescribed premises)

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	100 cubic m per day No change to throughput proposed as the application form claims the plant design capacity is 55,000L/day. = 55m3/day

Legislative 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 ☒	N/A
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes ☐ No ☒	N/A
Has the proposal been referred and/or assessed under the EPBC Act?	Yes ☐ No ☒	Reference No:

Has the applicant demonstrated occupancy (proof of occupier status)?	Yes ☐ No ☒	General lease ☒ Expiry: 30 June 2025
Has the applicant obtained all relevant planning approvals?	Yes ☒ No ☐ N/A ☐	Approval: Not provided in application DoH application submitted June 2021
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes ☐ No ☒	No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes ☐ No ☒	No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes ☐ No ☒	Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes ☒ No ☐	Name: Westonia Groundwater Area Type: Proclaimed Groundwater Area Has Regulatory Services (Water) been consulted? Yes ☐ No ☒ N/A ☐ Regional office: Wheatbelt
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes ☐ No ☒	N/A
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 ☒	

Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes ☐ No ☒	N/A
Is the Premises subject to any EPP requirements?	Yes ☐ No ☒	N/A
Is the Premises a known or suspected contaminated site under the *Contaminated Sites Act 2003*?	Yes ☐ No ☒	N/A