



Amendment Notice 1

Licence Number L8078/1996/3

Licence Holder Shire of Ravensthorpe

File Number: DEC11096

Premises Ravensthorpe's Limited Effluent Treatment and Reuse Facility
Lot 828 Jamieson Street
Legal description –
Crown Reserve 38576
Lot 828 on Deposited Plan 221206

Date of Amendment 13/04/2018

Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act.

Date signed: 13 April 2018

Christine Hass

MANAGER LICENSING (WASTE INDUSTRIES)

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

Definitions and interpretation

Definitions

In this Amendment Notice, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
AACR	Annual Audit Compliance Report
AER	Annual Environment Report
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 33 Cloisters Square PERTH WA 6850 info-der@dwer.wa.gov.au
CS Act	<i>Contaminated Sites Act 2003 (WA)</i>
Decision Report	refers to this document
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review
Licence Holder	Shire of Ravensthorpe
LETRF	Limited Effluent Treatment and Reuse Facility

m ³	cubic metres
Minister	the Minister responsible for the EP Act and associated regulations
Occupier	has the same meaning given to that term under the EP Act.
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report.
Risk Event	as described in <i>Guidance Statement: Risk Assessment</i>
UDR	<i>Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)</i>

Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

The following guidance statements have informed the decision made on this amendment:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Land Use Planning (February 2017)*
- *Guidance Statement: Licence Duration (August 2016)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

Amendment description

The Shire of Ravensthorpe (Licence Holder) has submitted an amendment application to accept and treat up to 85 cubic metres of grease trap waste annually at the Ravensthorpe Limited Effluent Treatment and Reuse Facility (LETRF).

Grease trap waste will be accepted through existing receival pits located below a concrete pad which then enters an anaerobic pond (Pond D) for treatment. Septage waste accepted at the LETRF is also received in this manner.

Pond D was not constructed in accordance with a Works Approval. The Licence Holder has outlined that Pond D was constructed using *in situ* clay materials and lined with a 300mm layer of bentonite treated in situ clay material to give a permeability of $1.3 \times 10^{-8} \text{m/sec}$.

Septage and grease trap waste that is pumped into Pond D is then diverted through to Pond A for further treatment. Sewage waste from the towns reticulated sewerage system, flows from a diverter sump where it is directed into Pond A. Wastewater is then passed through a mixing and transfer sump to Pond B/C. Pond B/C acts as a facultative/maturation pond. Wastewater is then piped through to two 70k/L holdings tanks for irrigation at sporting complex oval, hockey field and school oval. The wastewater is treated with chlorine prior to irrigation. The sampling point for monitoring purposes is collect from the storage tanks. There is a flow meter located on the irrigation pipeline which records the flow into the irrigation holding tanks. Table 2 below outlines the proposed changes to the Licence

Table 2: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
61	N/A	300 tonnes per year	Amendment to include the acceptance and treatment of grease trap waste

Amendment history

Table 4 provides the amendment history for L8078/1996/3.

Table 3: Licence amendments

Instrument	Issued	Amendment
L8078/1996/3	13/04/2018	Amendment Notice 1: Acceptance and treatment of grease trap waste

Location and receptors

Table 5 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 4: Receptors and distance from activity boundary

Residential and sensitive premises	Distance from Prescribed Premises
Local residence	350m
Town of Ravensthorpe	500m

Table 6 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 5: Environmental receptors and distance from activity boundary

Environmental receptors	Distance from Prescribed Premises
Groundwater	15mbgl (metres below ground level)

Risk assessment

Table 7 below describe the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. Both tables identify whether the emissions present a material risk to public health or the environment, requiring regulatory controls.

Table 6: Risk assessment for proposed amendments during operation

Risk Event					Consequence rating	Likelihood rating	Risk	Reasoning	
Source/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts					
Cat 61 Liquid waste facility	Acceptance and treatment of grease trap waste	Odour associated with grease trap waste treatment and disposal	The nearest residence is 350m away and the town of Ravensthorpe is 500m away	Air/ wind dispersion	Health and amenity impacts	Minor	Unlikely	Medium	<p>The Licence Holder intends to accept 85m³ of grease trap waste per year which the Delegated Officers to considered low volume. The Delegated Officer notes that grease trap waste this waste can be odorous in nature but will be discharged into Pond D via dedicated concrete receival pits along with septage waste prior to being pumped into Pond A for further treatment and biological breakdown. The Licence Holder will also wash down the receival pits after each use.</p> <p>The Delegated Officer considers that existing regulatory controls on the licence are sufficient to manage odours (condition 2.7.1).</p>
		Discharge to land Spillage of grease trap waste to the environment (including overtopping of ponds)	Groundwater is located 15mbgl. TDS ranges from 4,000 – 30,000 mg/L	Infiltration to groundwater through underlying soils	Contamination of land and underlying groundwater	Minor	Unlikely	Medium	Grease trap waste will be directed into one of three concrete lined receival pits and will be discharged into Pond D. The trucks will be parked on a concrete pad attached to the receival pits to reduce the

Risk Event					Consequence rating	Likelihood rating	Risk	Reasoning
Source/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts				
								<p>likelihood of a discharge event. There are no known uses of groundwater in the immediate area. Groundwater in the area is considered saline.</p> <p>The Delegated Officer considers that a discharge to land will probably not occur in most circumstances, and as such considers the risk to be Medium. The Delegated Officer has placed a condition on the Licence to ensure freeboard levels are maintained on all ponds.</p>
		Discharge to land: irrigation	Groundwater is located 15mbgl. TDS ranges from 4,000 – 30,000 mg/L	Infiltration to groundwater through underlying soils	Contamination of land and underlying groundwater	Minor	Unlikely	<p>Medium</p> <p>Irrigation will take place off-site and is subject to a Nutrient and Irrigation Management Plan.</p> <p>The quality of the treated wastewater is not expected to differ significantly from the existing discharge due to the treatment process. Existing monitoring requirements will identify elevated nutrient levels, and if excessive, greater regulatory controls may be imposed.</p>

Consultation

The Department of Health was contacted for comment. They responded on 9 March 2018, raising no objection subject to the Licence Holder removing or capping the septage pond overflow pipe, monitoring pond levels and desludging of the septage pond (Pond D). The Delegated Officer has added a condition relating to monitoring pond levels which is detailed below.

Decision

The Delegated Officer has determined that an amendment be made to the Licence conditions to allow the Shire to accept and treat grease trap waste at the LETRF. The Delegated Officer considered the impact of odour from grease trap waste treatment and the potential discharge to land from grease trap waste acceptance. The capacity of existing infrastructure at the premises is sufficient to accept grease trap waste.

Condition 1.3.1 has been amended to allow for the acceptance of grease trap waste onto the premises for treatment. The condition has also been updated to include septage waste.

Condition 1.3.2 has been added to the Licence to prevent the overtopping of the ponds causing an unauthorised discharge to the environment. The Licence Holder is also required to maintain an operating freeboard of 500mm on all ponds to allow for precipitation ingress and to prevent the overtopping of the ponds. The Licence Holder is also required to maintain the integrity of the ponds to prevent containment failure such as ponds leaking.

Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 21 March 2018. The Licence Holder responded on 23 March 2018 waiving the remaining comment period until 12 April 2018. No comments were submitted on the draft Amendment Notice.

Amendment

1. Prescribed Premises Categories are amended by the insertion of the red text shown in underline below:

Category number	Category description	Category production or design capacity	Premises production or design capacity
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 metres or more per day	100 cubic metres per day
<u>61</u>	<u>Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.</u>	<u>100 tonnes or more per year</u>	<u>300 tonnes per annual period</u>

2. Condition 1.3.1 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

- 1.3.1 The Licensee shall only allow waste to be accepted on to the Premises if:
 - (a) it is of a type listed in Table 1.3.1;
 - (b) the quantity accepted is below any limit listed in Table 1.3.1; and
 - (c) it meets any specification listed in Table 1.3.1

Table 1.3.1: Waste acceptance		
Waste	Quantity Limit	Specification
Sewage	100m ³ /day	Accepted through sewer inflow(s)
Sewage and sullage Septage and grease trap waste	300 tonnes per annual period	Accepted through septage dump point (pond 4). Tankered into the premises and discharged into one of three concrete lined receival pits.

3. Condition 1.3.2 has been added below:

1.3.2 The Licensee shall manage all wastewater treatment, receiving, facultative and storage evaporation ponds such that:

- (a) overtopping of the ponds does not occur;
- (b) a freeboard equal to, or greater than, 500mm is maintained;
- (c) the integrity of the containment infrastructure is maintained; and
- (d) trapped overflows are maintained on the outlet of ponds to prevent carry-over of surface floating matter.

Appendix 1: Key documents

	Document title	In text ref	Availability
1	Licence L8078/1996/3 – Ravensthorpe’s Limited Effluent Treatment and Reuse Facility	L8078/1996/3	accessed at www.dwer.wa.gov.au
5	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	DER 2015a	accessed at www.dwer.wa.gov.au
6	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	DER 2015b	
7	DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	DER 2016a	
8	DER, November 2016. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	DER 2016b	
9	DER, November 2016. <i>Guidance Statement: Decision Making</i> . Department of Environment Regulation, Perth.	DER 2016c	