



Application for Licence Amendment

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

Licence Number	L6071/1991/11
Licence Holder	Water Corporation
ACN	28 003 434 917
File Number	APP-0026521
Premises	Kellerberrin Water Resource Recovery Facility Rason Street KELLERBERRIN WA 6410 Legal description – Part of Lot 1 on Diagram 29615 and Lot 2 on Diagram 68517 As defined by the premises map in Schedule 1 and the coordinates in Schedule 2 of the Revised Licence
Date of Report	07/04/2025
Decision	Revised licence granted

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

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1. Decision summary

The Delegated Officer has determined to make amendments to Licence L6071/1991/11. The amendments are administrative in nature and therefore they do not alter the risk profile of the Premises, providing that activities, emissions and receptors as stated in existing approvals remain unchanged.

This Amendment Report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

The decision report for the existing licence will remain on the department's website for future reference and will act as a record of the department's decision making.

2. Scope of assessment

2.1 Regulatory framework

In amending the licence, 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

Licence L6071/1991/11 is held by the Water Corporation (Licence Holder) for the Kellerberrin Water Resource Recovery Facility (the Premises), located at Rason Street, Kellerberin.

The Premises relates to the category and the assessed design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in existing Licence L6071/1991/11.

On 26 November 2024, the Licence Holder submitted an application to the department to amend Licence L6071/1991/11 under section 59B of the *Environmental Protection Act 1986* (EP Act). The amendment is limited only to removing the reference to Inflow (Raw Inlet Channel – S5000500) as a continuous flow monitor in Table 4 of Condition 8 of the existing licence, so that the licence accurately represents the monitoring infrastructure on the premises.

Inflow (Raw Inlet Channel – S5000500) has been referenced as a continuous flow monitor in error. Inflow (Raw Inlet Channel – S5000500) is a sampling point and not a monitoring point. An inflow monitor does not exist on the premises and therefore, water balance calculations based on the measured outflows from the site (measured by outflow meter M1) are used to determine inflows to the premises. The existing infrastructure on site is shown in Figure 1.

The Biennial Environmental Report (BER) for the premises for the 1 July 2021 to 30 June 2023 period recorded a non-compliance with Condition 8, Table 4, as the inflow was not continuously monitored at Raw Inlet Channel – S5000500 due to the absence of a flow meter. This application intends to address this non-compliance to avoid future non-compliances with Condition 8.

The BER for the 1 July 2021 to 30 June 2023 reporting period reported an annual average daily flow of 147 m³/day for the 2022-2023 period and an annual average daily flow of 113 m³/day for the 2021-2023 period. Both are under the assessed design capacity for the premises of 210 m³/day.

Kellerberrin WRRF (S0015439)

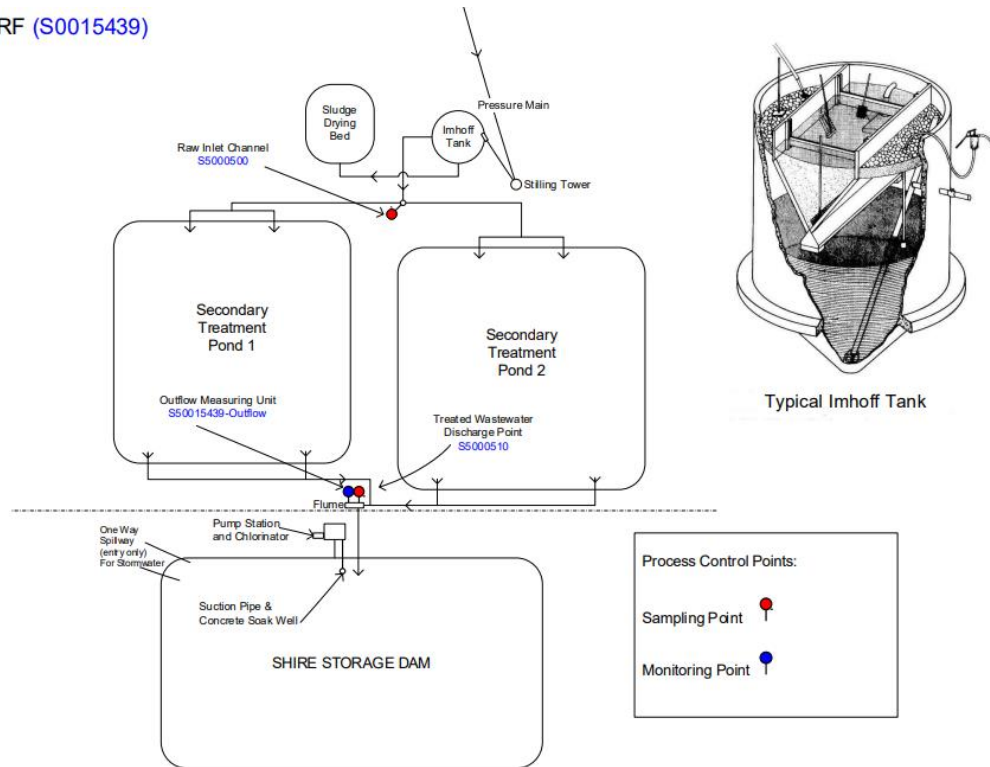


Figure 1: Kellerberrin WRRF Process Control Table Schematic

2.3 Background

The Licence Holder previously applied to the department for an amendment to the licence in 2015 to remove reference to inflow meter (M1) as there was no measuring device for monitoring of inflows onto the site. The department determined on 24 December 2015 that *“Based on the low environmental risk premises and no direct discharges to the environment, it is assessed that SPS hours will enable suitable calculation of inflow to the plant using water balance calculations compared with the outflow measurement. The requirement of inflow monitoring by inflow meter is removed from condition 2.2.1, Table 2.2.1.”*

A subsequent amendment to the licence on 21 April 2016 reverted Condition 2.2.1, Table 2.2.1, to how it appeared prior to the 24 December 2015 amendment, returning the requirement to monitor inflow via inflow meter M1. No comments were received from the Licence Holder at the time regarding this change.

The licence was renewed on 30 November 2022, with conditions from the amended licence issued in 2016 being transferred across with minor corrections. At this time, Inflow meter M1 was renamed to “Raw Inlet Channel – S5000500” in accordance with Figure 1 above. No comments were received from the Licence Holder on the draft instrument or Decision Report.

3. 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.

The proposed amendment is solely to make changes to the licence to accurately reflect the

monitoring infrastructure that exists on the site. Therefore, the amendment does not alter the risk assessments previously undertaken for the premises. However, it is noted that the calculation of inflows based on measured outflows from the site is not as accurate as using an inflow meter.

The department requested further information on the calculation methods used by Water Corporation to determine the daily inflow on 28 January 2025. Water Corporation provided a water balance spreadsheet for the premises and a worked example on 18 February 2025. The department reviewed the calculation methods provided and determined that the current method was not accurate enough for the purposes of determining compliance with the premises' design capacity as the daily average was being calculated based on the calculated annual inflow total.

Due to the constraints around installing an inflow meter at the premises (funding and site power availability), the department determined that calculating the inflow rate would be considered acceptable if seasonal variability was taken into account and visible within the daily average throughput calculations. The calculations provided would need to indicate any variation in daily inflow averages from month to month as depicted in Figure 2.

Inflow Volume Monthly (kL) / Days per month = Volume/Day Monthly Average (kL)

Month	Inflow Volume Monthly kL	Volume / day Monthly Average kL
Jul	4490.204733	144.845314
Aug	4684.942852	151.1271888
Sep	4411.305975	147.0435325
Oct	4481.532722	144.5655717
Nov	4676.406952	155.8802317
Dec	4759.503231	153.5323623
Jan	5047.060241	162.8083949
Feb	4986.971821	171.9645456
Mar	5186.228812	167.2977036
Apr	4703.876903	156.7958968
May	5177.452995	167.0146127
Jun	4559.921243	151.9973748

Figure 2: Daily average calculations by month to be reflected in water balance spreadsheet

The Delegated Officer has determined that this method of calculation will be incorporated into the environmental reporting requirements of the Licence (condition 14) and reflected in the monitoring of inputs and outputs requirements of the Licence (condition 8) as opposed to being removed entirely as requested by the Licence Holder.

4. Consultation

The Licence Holder was provided with the draft Amendment Report on 12 March 2025. The Licence Holder waived the comment period on 03 April 2025.

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that an amended 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 1 below provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the Revised licence as part of the amendment process.

Table 1: Summary of licence amendments

Condition no.	Proposed amendments
8	Removal of the requirement to monitor daily sewage inflow continuously due to the absence of an inflow meter. Condition amendment to reflect monitoring of inflows as a monthly average.
14	Addition of a reporting requirement for the provision of detailed calculations demonstrating how monthly average daily inflow has been determined.

References

1. Department of Environment Regulation (DER) 2015, Guidance Statement: Setting Conditions, Perth, Western Australia.