



## Application for Licence Amendment

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

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<b>Licence Number</b>	L6748/1994/13
<b>Licence Holder</b>	Water Corporation
<b>ACN</b>	634 169 841
<b>File Number</b>	2011/003323
<b>Premises</b>	Caddadup (Mandurah No. 3) Water Resource Recovery Facility  1000 Old Coast Road DAWESVILLE WA 6211  Legal description – Lot 1955 on Plan 192450 (Crown Reserve 44270)
<b>Date of Report</b>	17 August 2023
<b>Decision</b>	Revised licence granted

**Grace Campbell**

**A/Senior Environmental Officer, Industry Regulation**

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

## Table of Contents

<b>1. Decision summary</b>	<b>3</b>
<b>2. Scope of assessment</b>	<b>3</b>
2.1 Regulatory framework	3
2.2 Background	3
2.3 Application summary	4
2.4 Consolidation of Licence	4
<b>3. Consultation</b>	<b>4</b>
<b>4. Conclusion</b>	<b>5</b>
4.1 Summary of amendments	5
<b>References</b>	<b>8</b>
<b>Appendix 1: Summary of Licence Holder’s comments on draft amendment</b>	<b>9</b>

## 1. Decision summary

Licence L6748/1994/13 is held by the Water Corporation (Licence Holder) for the Caddadup (Mandurah No. 3) Water Resource Recovery Facility (the Premises), located at Lot 1955 on Plan 192450 (Crown Reserve 44270) Caddadup WA.

The Delegated Officer has determined to make amendments to Licence L6748. The amendments outlined within this amendment report do not alter the risk profile of the Premises. As a result of this assessment, Revised Licence L6748/1994/13 has been granted.

This Amendment Report documents the amendments made pursuant to sections 59(2), 59(1)(a), 59(1)(b) and 59B(9) of the *Environmental Protection Act 1986* (EP Act).

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.

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 Background

The Caddadup (Mandurah (No. 3) Water Resource Recovery Facility is located just off the Old Coast Road in Dawesville. The plant was established in 1994 and upgraded in 2008. The closest residential receptors are located 400m to the southwest and 500m to the southeast of the premises. The Dawesville Channel is located approximately 2km north of the plant and the Peel Harvey Inlet is located 800m east of the plant. Both are popular locations for fishing and boating activities.

The operations at the premises include the treatment of sewage to a secondary standard and the on-site infiltration of treated wastewater. Plant infrastructure consists of:

- inlet works and preliminary treatment to remove coarse material and grit from sewage;
- activated sludge process which includes one oxidation ditch;
- sludge handling facility;
- two secondary clarifiers;
- Dissolved Air Flotation Thickener tank;
- three infiltration ponds; and
- odour control facility.

The main potential emissions from the site are discharges of treated wastewater to land via infiltration into the infiltration ponds (and potentially to groundwater) and fugitive emissions in the form of odour.

Discharges of treated wastewater to land are managed by treating wastewater to a defined water quality level and undertaking compliance monitoring prior to discharge.

Odour emissions are managed by extracting emissions from the initial inlet tank and the bioselector where emissions are passed through extraction fans and a bioscrubber to be

discharged into the air via a stack which is approximately 10m high and ongoing maintenance of the facility. Given the buffer of 400m and 500m from sensitive receptors, odour emissions are considered low risk.

## 2.3 Application summary

On 13 March 2023, the Licence holder submitted an application to the department to amend Licence L6748/1994/13 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendment is limited only to altering the due date for the environmental report and annual audit compliance report, to be 1 October annually, and to change the premises name.

In amending the licence, the CEO has also:

- updated the format and appearance of the Licence;
- deleted the redundant AACR form set out in schedule 2 of the previous licence and advise the Licensee to obtain the form from the department’s website;
- revised licence condition’s numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

No changes to the aspects of the Existing Licence relating to Category 54 have been requested by the Licence Holder. Table 1 below outlines the current approved production/design capacity for the Premises.

**Table 1: Premises approved design capacity**

Category	Approved 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.	Not more than 3000 m <sup>3</sup> per day

## 2.4 Consolidation of Licence

As part of this amendment package the department has consolidated the licence by incorporating changes made under the Amendment Notices as summarised in Table 2.

**Table 2: Licenses consolidated in this amendment**

Instrument	Issued	Summary of approval
L6748/1994/13	29/04/2016	Notice of Amendment of Licence Expiry Dates to be 11 October 2030.

The obligations of the Licence Holder have not changed in consolidating the licence. The department has not undertaken any additional risk assessment of the Premises related to previous Amendment Notices.

## 3. Consultation

The Licence Holder was provided with the draft Amendment Report on 1 June 2023. Comments received from the Licence Holder on 30 June 2023 have been considered by the Delegated

Officer as detailed in Appendix 1.

## 4. 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.

### 4.1 Summary of amendments

Table 3 below provide 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 3: Summary of licence amendments and consolidation of licence conditions in this amendment**

Condition no.	Previous condition	Condition summary	Conversion notes
N/A	N/A	Cover Page	Registered business address updated. ACN added. Premises name updated. Updated to revised licensing format – prescribed premises category description included. Expiry date amended to 11/10/2030 in accordance with the Notice of Amendment of Licence Expiry Dates (29/04/2016).
Interpretation	1.1.1	Interpretation	Redundant condition. Revised to current licensing format.
N/A	1.1.3	Australian or other standard	Redundant condition. Revised to current licensing format.
N/A	1.1.4	Reference to code of practice	Redundant condition. Revised to current licensing format.
N/A	1.2.1	Authorisation of Emissions	Redundant condition. Deleted from Licence.
N/A	1.2.3	Storage of environmentally hazardous materials	Redundant condition. Adequately regulated by the <i>Dangerous Goods Safety Act 2004</i> . Deleted from licence.
N/A	1.3.1	Exceedance of limits	Redundant condition. Deleted from Licence. The requirements to monitor are adequately covered by condition 13 Table 5. The requirements to report target or limit exceedances are adequately covered by condition 20 Table 8.
Condition 1 Table 1	1.3.2 Table 1.3.1	Waste acceptance	New numbering. Revised to current licensing format.

Condition no.	Previous condition	Condition summary	Conversion notes
Condition 2 Table 2	1.3.3 Table 1.3.2	Waste processing	New numbering.
Condition 3 Table 3	1.3.4 Table 1.3.3	Containment infrastructure	New numbering. Revised to current licensing format. Reference to bunded hardstand area / graded hardstand area included for inlet works specifications.
Condition 4	1.2.2	Pollution control and monitoring equipment	Redundant condition. Revised to current licensing format to specify premises specific infrastructure and equipment.
Condition 5	1.3.5	Management of ponds	New numbering. Revised to current licensing format.
Condition 6	1.3.6	Security measures	New numbering. Revised to current licensing format.
N/A	2.1.1	Limit exceedances	Redundant condition. Deleted from Licence. The requirements to monitor are adequately covered by condition 13 Table 5. The requirements to report target or limit exceedances are adequately covered by condition 20 Table 8.
Condition 7	1.2.4	Recovery and removal of spills	Redundant condition. Revised to current licensing format.
N/A	2.2 – 2.4	Emissions to air, surface water and groundwater	Redundant condition. Deleted from Licence.
Condition 8 Table 4	2.5.1. Table 2.5.1	Emissions to land	New numbering. Revised to current licensing format. Reference to 'pumped' replaced with 'gravity fed'.
N/A	2.5	Fugitive emissions	Redundant condition. Deleted from Licence.
N/A	2.6	Noise	Redundant condition. Deleted from Licence.
Condition 9	2.7.1	Odour	New numbering. Revised to current licensing format.
Condition 10	1.2.5	Prevention of contamination and containment of contaminated stormwater	Redundant condition. Revised to current licensing format.

Condition no.	Previous condition	Condition summary	Conversion notes
Condition 11	3.1.1	Sample preservation	New numbering. Revised to current licensing format.
N/A	3.2 – 3.4	Monitoring of emissions to air, surface water and groundwater	Redundant condition. Deleted from Licence.
Condition 12 Table 5	3.5.1 Table 3.5.1	Monitoring emissions to land	New numbering. Revised to current licensing format. Reference to L/s removed for volumetric flow monitoring. Reference to 'solids' removed from within the 'monitoring point reference and location' specification. Premises name updated reflected.
Condition 13 Table 6	3.6.1 Table 3.6.1	Monitoring inputs and outputs	New numbering. Revised to current licensing format. Note reference removed.
N/A	3.7	Process monitoring	Redundant condition. Deleted from Licence.
Condition 14 Table 7	3.8.1 Table 3.8.1	Monitoring ambient groundwater quality	New numbering. Revised to current licensing format.
N/A	3.9	Meteorological monitoring	Redundant condition. Deleted from Licence.
N/A	N/A	Improvements	Redundant condition. Deleted from Licence.
Condition 15	5.1.1	Record keeping	New numbering.
N/A	5.1.2	Person in charge of premises	Redundant condition. Deleted from Licence.
Condition 16	5.1.3	AACR	AACR submission date amended to 1 October. Wording updated to current standard wording. Reference and format updated.
Condition 17	5.1.4	Complaints	New numbering. Revised to current licensing format.
Condition 18 Table 8	5.2.1 Table 5.2.1	Environmental report	Revised to current licensing format. Environmental Reporting submission date amended to 1 October annually.

Condition no.	Previous condition	Condition summary	Conversion notes
Condition 19	5.2.2	Submission requirements Environmental report	New numbering. Revised to current licensing format.
Condition 20 Table 9	5.2.3 Table 5.2.2	Non-annual reporting requirements	New numbering. Revised to current licensing format.
Condition 21 Table 10	5.3.1	Notification requirements	New numbering. Revised to current licensing format.
Definitions Table 11	1.1.2	Definitions	Revised to current licensing format.
Schedule 1: Maps	Schedule 1: Maps	Premises maps	New naming convention, no change to maps.
Schedule 2: Forms	Schedule 2: Reporting & notification forms	Reporting & notification forms	Deleted annual audit compliance report proforma - Section A, Section B and Section C N1 form revised to current licensing format. Forms accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>

## 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 1: Summary of Licence Holder's comments on draft amendment

Condition	Summary of Licence Holder's comment	Department's response
3	<p>Table 3 - Inlet works (Spiral Sieve screen, manual bypass screen and screenings bin)</p> <p>Include working for screenings requirements 'within a bunded hardstand area, or a hard stand area which is graded to a collection drain, which returns sludge leachate to the start of the treatment process'.</p> <p>Including an option for graded hardstand and collection drain is consistent with Condition 2, Table 2. Inlet works and screenings are considered 'preliminary treatment infrastructure'. Current inlet works are on a graded hardstand area in accordance with Condition 2, Table 2.</p>	<p>Previous revisions of the Licence prior to the licence being placed in the REFIRE format in 2015 do not have reference to 'graded hardstand and collection drain'. There is also no justification on file explaining why this specification was included.</p> <p>However, because this option is included in Condition 2 Table 2 of the Licence, carrying this option over to Condition 3 Table 3 of the Licence does not alter the risk profile of the premises.</p> <p>This change can be incorporated into the final licence.</p>
8	<p>Table 4 - Source Including Abatement</p> <p>Treated wastewater is gravity fed from the clarifiers, not pumped.</p>	<p>Reference to 'pumped' amended to 'gravity fed' as requested.</p>
12	<p>Table 5 - Monitoring point reference and location</p> <p>The term 'Solids' within the 'monitoring point reference and location' appears to be error.</p> <p>The Term 'WWTP' is written as V. V. TP. Site has also changed reference to WRRF (Water Resource Recovery Facility).</p>	<p>The inclusion of 'Solids' appears to be an error – no reference of this on previous licence revisions.</p> <p>Reference to 'WWTP' or 'VWVTP' (appears to also be an error) will be changed to 'WRRF' throughout the Licence and Decision report to reflect the premises name change.</p>
12	<p>Table 5 - Clarifier 1 and Clarifier 2</p> <p>We measure in m<sup>3</sup>/day only, not L/s. We don't see need to convert daily rates to L/s.</p>	<p>Reference to L/s removed as requested.</p>
13	<p>Table 6 – Note to Table</p> <p>All monitoring referred to in table is continuous – no monthly monitoring occurs, as specified in Note 1.</p>	<p>Note 1 to Table 6 removed as requested.</p>