



## Application for Licence Amendment

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

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<b>Licence Number</b>	L6786/1991/11
<b>Licence Holder</b>	Water Corporation
<b>File Number</b>	DER2016/000759-1~2
<b>Premises</b>	<p>Albany Water Resource Recovery Facility</p> <p>100 Timewell Road</p> <p>MCKAIL WA 6330</p> <p>Lot 1 on Diagram 44295 MCKAIL WA 6330   Tree farm 1 35790 Albany Highway, Lot 10 on Plan 84694, Lot 2 on Plan 43845, Lot 749 on Plan 100633, Lot 815 on Plan 101284, Lot 4822 on Plan 157224 and Lot 3325 on Plan 79932 DROME WA 6330</p> <p>As defined by the Premises map attached to the Revised Licence</p>
<b>Date of Report</b>	29 July 2022
<b>Proposed Decision</b>	Revised licence granted

**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 L6786/1991/11 is held by Water Corporation for the Albany Water Resource Recovery Facility (the Premises), located at 100 Timewell Road, McKail.

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 operation of the Premises. As a result of this assessment, Revised Licence L6786/1991/11 has been granted.

## 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 Amendment summary

On 6 April 2022, the Licence Holder submitted an application to the department to amend Licence L6786/1991/11 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- extending the due date to submit an odour analysis report to the CEO out to 31 December 2022, given as 1 April 2022 under the current licence condition 24(c), due to operation limitations and requirements to effectively meet the requirements of the condition.

In addition, the Delegated Officer identified a typographical error to be corrected part of this licence amendment. Within condition 24(c) an incorrect reference to condition 25(b) exists that will be amended to correctly reference condition 24(b).

No change to the design capacity at the premises, set out in Table 1 below, is proposed.

**Table 1: Proposed throughput capacity changes**

Category	Design capacity
54	8,500 m <sup>3</sup> / day
61	102 tonnes per annual period

## 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

Odour was previously assessed during the amendment dated 30 November 2021, following several odour complaints. Therein some aspects of the odour emissions were considered to pose a high risk to the health and amenity of surrounding populations. The Delegated Officer concluded that adding Condition 24 to the licence was appropriate to inform the risk assessment process, appropriate emission controls and directed that items 1) to 4) were to stay in effect until such time as the risks of impact from emission of odour are mitigated to a frequency of unlikely to rare. This Decision Report recognises and uphold the previous odour assessment and considers a change to the reporting due date of an odour risk control item.

Table 2 below.

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Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

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**Table 2: Licence Holder controls**

Emission	Sources	Potential pathways	Proposed controls
Odour	Operation of the WRRF – operation of lagoon 1, handling of sewage sludge during removal, operation of odour treatment facility	Air/windborne impacts to air quality, human health and amenity	The Licence Holder has not proposed any additional controls while the delayed odour studies are completed.

### 3.1.2 Receptors

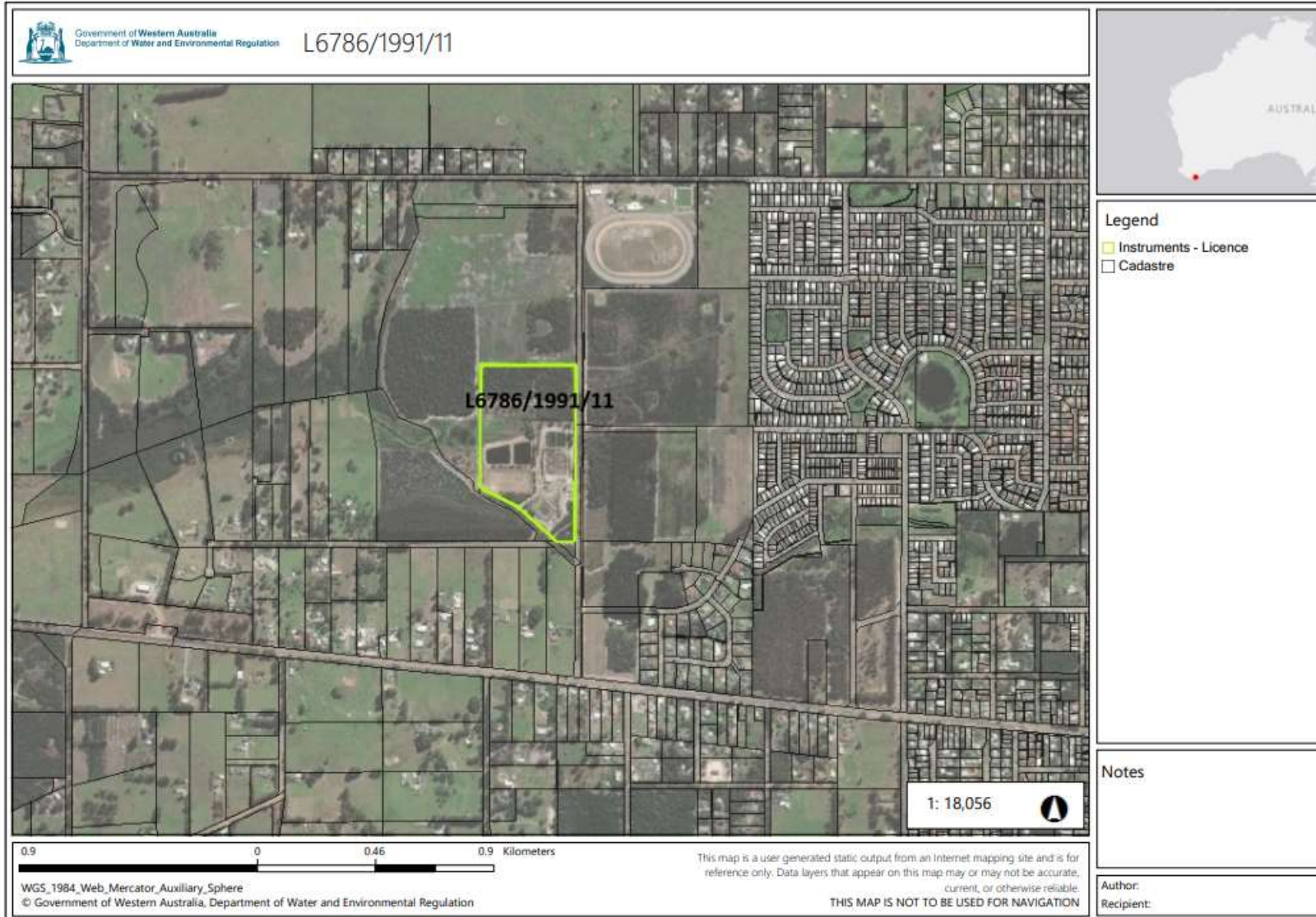
In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 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 3: Sensitive human and environmental receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
Residences	Surrounding the premises from 300 m south, 400 m west and north and 570 m east.
Lands zoned public use (Water Corporation)	Surrounding the premises, including the <i>Waste Water Treatment Plant Odour Buffer Special Control Area</i>
Lands zoned residential, special residential, rural residential and future urban	Approximately 350m - 600 m from the north west, around to the north, east and south east
Lands zoned general agricultural	Adjacent south and 300 m west
Residences	Surrounding the premises from 300 m south, 400 m west and north and 570 m east.



**Figure 1: L6786 location with surrounding residences**

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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 4.

The Revised Licence L6786/1991/11 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. the Albany Water Resource Recovery Facility activities. The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 4. Risk assessment of potential emissions and discharges from the Premises during operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation of WRRF – operation of IDEA Lagoon 1	Odour	Air/windborne pathway causing impacts to health and amenity	Residences and adjacent land uses	Refer to Section 3.1	C = <i>Moderate</i> L = <i>Likely</i> <b>High Risk</b>	N/A	Condition 24	The amendment to extend the submission date for the odour analysis report is not considered to change the risk profile for odour emissions at the Premises. The justification for the extension is considered reasonable and will support the evidence based approach to prevent and mitigate emissions of odour.  See Amendment Report dated 30 November 2021 for further information.
Operation of WRRF – handling and management of sewage sludge during removal					C = <i>Moderate</i> L = <i>Likely</i> <b>High Risk</b>			
Operation of WRRF – operation of the odour treatment facility					C = <i>Minor</i> L = <i>Rare</i> <b>Low Risk</b>			

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.

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## 4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

**Table 5: Consultation**

Consultation method	Comments received	Department response
Local Government Authority advised of proposal 7 June 2022 and 17 June 2022	None	N/A
Licence holder was provided with draft amendment on 23 June 2022	The licence holder replied on 22 July 2022 with no comments or changes requested.	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 6 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 6: Summary of licence amendments**

Condition no.	Proposed amendments
24(c)	Change due date for odour analysis report from 1 April 2022 to 1 April 2023. Change cross-reference from condition 25(b) to 24(b).



## 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: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)				
<b>Application type</b>				
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L6786/1991/11	
		Relevant works approval number:	N/A	<input checked="" type="checkbox"/>
Date application received	6 April 2022			
<b>Applicant and Premises details</b>				
Applicant name/s (full legal name/s)	Water Corporation			
Premises name	Albany Water Resource Recovery Facility			
Premises location	100 Timewell Road, Lot 1 on Plan 44295 MCKAIL WA 6330  Albany Wastewater Treatment Plant – Tree farm 1 35790 Albany Highway, Lot 10 on Plan 84694, Lot 2 on Plan 43845, Lot 749 on Plan 100633, Lot 815 on Plan 101284, Lot 4822 on Plan 157224 and Lot 3325 on Plan 79932 DROME WA 6330			
Local Government Authority	City of Albany			
<b>Application documents</b>				
HPCM file reference number:	DER2016/000759-1~2			
Key application documents (additional to application form):	N/A			
<b>Scope of application/assessment</b>				
Summary of proposed activities or changes to existing operations.	<p>Applications requests to change the due date in condition 24c relating to odour study reporting. Application requests an extension until 31 December 2022.</p> <p>LO notes there is an error in condition 24c in cross-referencing condition 25(b) (about irrigation management plans) when it should cross-reference 24(b). Proposed DWER-initiated amending the condition to fix the cross reference also.</p> <p><i>24. The licence holder must:</i></p> <p><i>(a) undertake the action items and corresponding requirements specified in Table 17 for odour emissions and all odour complaints;</i></p> <p><i>(b) Conduct an odour emission screening and detailed analysis for the Albany WWTP consistent with the requirements in the Guideline: odour emissions; and</i></p> <p><b><i>(c) Submit to the CEO, no later than 1 April 2022, an odour analysis report on the findings and outcomes of condition 25(b).</i></b></p>			

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	Proposed changes to the production or design capacity
Category 54: sewage facility	8,500 m <sup>3</sup> /day	N/A
Category 61: liquid waste facility	102 tonnes per annual period	N/A

**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 <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Previously established with certificate of title
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	N/A
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i> )	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>Dangerous Goods Safety Act 2004</i> <i>Environmental Protection (Controlled Waste) Regulations 2004</i> Other as applicable to activities undertaken

Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Possibly contaminated – investigation required Date of classification: 1 December 2021 (DWERVT8957) Note this was classified since the previous licence amendment and further detailed investigations are due to be completed by Water Corporation.