



## Application for a licence amendment

Division 3, Part V *Environmental Protection Act 1986*

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<b>Licence number</b>	L7333/1997/10
<b>Licence holder</b>	Vasse Felix Pty Ltd
<b>ACN</b>	009 181 444
<b>DWER file number</b>	DWERDT998930
<b>Premises</b>	Vasse Felix Winery 71 Tom Cullity Drive COWARAMUP 6284
<b>Date of report</b>	24/09/2024
<b>Status of report</b>	Draft for consultation

## Amendment description

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

This amendment is limited to changes from the completion of works by the licence holder, increasing hydraulic loading in the west leach field, clarification on treated wastewater discharge readings, and reporting requirements.

In completing the assessment documented in this 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>.

## Purpose and scope of assessment

Vasse Felix is seeking to update the infrastructure listed on the licence due to the completion of works specified in current licence, increased hydraulic conductivity of the west leach field, adjustment to conditions of discharge of treated wastewater monitoring and reporting.

## Background

The licence holder operates a winery located in Cowaramup. Currently the winery operates under an assessed production capacity of 2,100 kilolitres of wine produced per year. The wastewater generated by the winery is treated by an onsite wastewater treatment plant and disposed of via leach drains.

As a response to a previous amendment granted on 28 October 2022 and a follow up CEO initiated amendment on 19 December 2022 which granted the licence holder approval to construct and operate a new leach drain, new sludge dewatering bin, and bund. The licence holder is seeking to amend the licence to reflect the newly constructed infrastructure.

## Proposed amendments

The licence holder wishes to make administrative amendments to update the licence in accordance with the completion of works required by the current licence. This will integrate the constructed infrastructure to the infrastructure table of the licence by removing the works conditions.

The licence holder has also applied for additional amendments/ clarifications to the licence which are as follows:

1. Increase in hydraulic loading in the west leach field from 14,500 L/day to 16,200 L/day.
2. That daily discharge meter readings during vintage are only required if discharge has occurred.
3. Clarification on the condition that daily discharge outside of vintage is calculated as an average daily discharge calculated from the total monthly discharge.
4. Remove reference to arsenic in Table 6 groundwater monitoring as there has been no detection above the threshold value of 0.024mg/L. Remove the requirement for NATA accreted analysis.

### Completion of works

The licence holder submitted compliance documentation for the infrastructure included in the works conditions as follows:

- Sludge dewatering bund on 25 January 2023.
- Balance tank on 23 February 2023.
- West area leach drain replacement on 28 February 2024.

The licence holder demonstrated compliance for all conditions except for reaching the submission date for the balance tank and the west area leach drain.

#### Increase in hydraulic loading

During the construction of the west leach drain the licence holder extended the length of the beds in the leach field by 27m which was done to maximise the use of the 900m<sup>2</sup> leach field area. As per the equation for trench and bed dimensions in standards *On-site domestic wastewater management* the increase in bed length increased the hydraulic capacity to 16,200 L/day.

**The delegated officer has amended the change in hydraulic loading of the west leach field.**

#### Discharge reading and reporting

The licence holder states that there are periods during vintage when the plant is not operational e.g. during weekends so daily discharge readings are not necessary as there's no discharge occurring.

**The delegated officer has amended the licence to change the operational condition for discharge recording and remove arsenic monitoring for groundwater.**

#### Removal of arsenic from groundwater monitoring and NATA accredited analysis requirements

The previous licence amendment required the licence holder to record arsenic values in their groundwater monitoring. If arsenic was not detected above the freshwater guideline value for 95% species protection, then this parameter may be removed from the monitoring requirements for groundwater.

Arsenic has been monitored in groundwater samples on five occasions between 09 August 2022 to 29 February 2024. In that period the licence holder has not recorded a total arsenic value above the limit of reporting (0.001 mg/L) in groundwater.

**The delegated officer determines from the monitoring data submitted in the previous reporting period that arsenic reporting can be removed from the licence.**

The licence holder has indicated that they wish for parameters sodium, magnesium, calcium, and sodium adsorption ratio (SAR) to not require analysis by a NATA accredited laboratory. The licence holder provided their groundwater monitoring plan. In this plan they provided justification as to why the mentioned parameters were able to be accurately tested under methods without NATA accreditation with the main reason being that the lab they send their samples to does not have NATA accreditation.

**The delegated officer determines that the reasoning for non-NATA accredited analysis to be sufficient.**

## Decision

The delegate officer has determined that sufficient information has been provided to amend the licence according to the newly constructed infrastructure and additional administrative type amendments.

#### Licence holder comments on draft decision

The licence holder was provided with a draft of the revised licence and amendment report on

2/09/2024. The licence holder provided comments on 18 September 2024, which were incorporated into the licence

## Conclusion

Based on this assessment, it has been determined to amend the existing licence, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### Summary of amendments

The below table 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 works approval as part of the amendment process.

Reference	Proposed amendments
Condition 1, Table 1.	<p><u>5. Wastewater treatment plant (WWTP):</u></p> <ul style="list-style-type: none"> <li>• Addition of the newly constructed aeration tank and removal of the decommissioned tanks.</li> <li>• Removal of “As of” dated condition.</li> </ul> <p><u>6. 1800m<sup>2</sup> leach drain field divided into two areas:</u></p> <ul style="list-style-type: none"> <li>• Removal of any “As of” and “Until” dated conditions.</li> <li>• Increase hydraulic loading to the west area.</li> <li>• Addition of new infrastructure of a distribution box and diverters.</li> <li>• Improved clarity.</li> </ul>
Condition 2 – 4.	Removed conditions due to the completion of works.
Condition 11, Table 6.	<p>Removal of Arsenic as a parameter.</p> <p>Added Non-NATA accreted analysis permitted for parameters sodium, magnesium, calcium and SAR.</p>
Condition 14.	Removal of works condition.
Condition 16, Table 7.	<p>Added measurements for clarity.</p> <p>Added requirement to use the DWER “Nutrient loading calculator” spreadsheet.</p>
Schedule 1: Maps.	Updated and added maps according to newly constructed infrastructure.

## References

1. Department of Environment Regulation (DER) 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Decision Making*, Perth, Western Australia.
3. Standards Australia 2012, *Onsite domestic wastewater management, AS/NZS 1547:2012*.
4. Vasse Felix 2024, *Vasse Felix L7333 – Licence amendment cover letter*, Cowaramup, Western Australia.
5. Vasse Felix 2024, *Attachment 1 Licence amendment application, Cowaramup, Western Australia*.