



Department initiated Amendment

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

Licence Number	L7440/1998/7
Licence Holder	Water Corporation
File Number	DEC13161/1
Premises	Bridgetown Water Resource Recovery Facility #2 Lot 10438 on Plan 153767 HESTER BROOK WA 6255
Date of Report	28/06/2024
Decision	Revised licence granted

**A/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 L7440/1998/7 is held by Water Corporation (Licence Holder) for the Bridgetown Water Resource Recovery Facility #2 (WWTP) (the Premises), located on Lot 10438 on Plan 153767, Hester Brook WA 6255. The WWTP comprises an Intermittent Decanting Extended Aeration (IDEA) plant treating water to a tertiary standard, a chlorine disinfection plant, two lined sludge drying beds and an irrigation storage dam.

This Amendment Report documents the assessment of potential risks to the environment and public health in removing the requirement for Total Suspended Solids (TSS) monitoring of bores via an amendment initiated by the Department of Water and Environmental Regulation (DWER; the department). As a result of this assessment, revised Licence L7440/1998/8 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing licence previously granted in relation to the Premises.

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 Application summary

On 5 April 2024, the Licence Holder advised the department that a revised licence granted 23 July 2021 included the addition of Total Suspended Solids (TSS) monitoring for bores 03/17, C and 05/17 to condition 13 that had not been previously conditioned on the licence.

The Delegated Officer considers it an error that TSS monitoring was added to the licence. Due to the limited information on the TSS monitoring condition addition provided in the decision report issued 23 July 2021 and the length of time since the revised licence was issued, a new risk assessment was conducted to determine if removing TSS monitoring would pose an increased environmental risk by not analysing the parameter.

On 16 April 2024, the department initiated an amendment to Licence L7440/1998/8. The amendment is limited to removing TSS monitoring requirements in Table 4 under condition 13.

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 decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where

necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Operation			
Wastewaters and contaminated stormwater	Spills/leaks of raw sewage, treated effluent, sludge and chemicals. Discharge of wastewater to land prior to treatment. Incorrect discharge rate to land. Discharge during high rainfall events.	Overland runoff, direct discharge and migration via soil to groundwater.	None Adhere to licence monitoring conditions

3.1.2 Receptors

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

Table 2 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 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential/commercial	~ 150 m south of the premises boundary
Environmental receptors	Distance from prescribed activity
Groundwater	~ 5 - 22 mBGL

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant 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 applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3

Licence L7440/1998/8 that accompanies this decision report authorises emissions associated with the operation of the premises.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 3: Risk assessment of potential emissions and discharges from the premises during operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Operation of WWTP	Discharge of treated wastewater	Overland runoff, direct discharge and migration via soil to groundwater.	Underlying Groundwater	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	1,4, 5, 6 and 13	N/A
	Spills/ unintended releases of untreated wastewater, solid waste or treatment chemicals							

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 16 May 2024	Requested the department to: <ul style="list-style-type: none"> Update premises name Update Annual Audit Compliance Report (AACR) and Environmental Report submission dates and requirements. 	Noted

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.

The department has removed the requirement for TSS monitoring of the bores as TSS is filtered out as water passes through the ground, thus the analysis of TSS does not reduce the interpretative value of the monitoring dataset or increase the environmental risk by not analysing the parameter.

5.1 Summary of amendments

Table 5 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 5: Summary of licence amendments

Condition no.	Proposed amendments
n/a	Update premises name
13, Table 4	Correct title of table to "Monitoring of emissions to groundwater" Total Suspended Solids (TSS) monitoring removed for bores 03/17, C and 05/17
16	Update condition to include Annual Audit Compliance Report (AACR) submission date.
18	Update condition to include Environmental Report submission date and biennial reporting.

References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. DWER 2019, *Guidance Statement: Industry Regulation Guide to Licensing*, Perth, Western Australia.