



## Application for Licence Amendment

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

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<b>Licence Number</b>	L7691/1991/5
<b>Licence Holder</b>	Water Corporation
<b>ABN</b>	28 033 434 917
<b>File Number</b>	DER2014/001052-1~1
<b>Premises</b>	Three Springs Wastewater Treatment Plant Water Street THREE SPRINGS WA 6519  Legal description – Being Lot 20 on Diagram 73005  As defined by the Premises map and coordinates attached to the revised licence
<b>Date of Report</b>	11/09/2024
<b>Decision</b>	Revised licence granted

#### **A/MANAGER WASTE INDUSTRIES**

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

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## 1. Decision summary

Licence L7691/1991/5 is held by Water Corporation (licence holder) for the Three Springs Wastewater Treatment Plant (the premises), located off Water Road, Three Springs.

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 L7691/1991/5 has been granted.

The revised licence issued through 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.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the Department of Water and Environmental regulation (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 10 May 2024, the licence holder submitted an application to the department to amend licence L7691/1991/5 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- The licence holder requests the inclusion of wording under Condition 1.3 relating to desludging of the premises. The intention of this request is to ensure adequate coverage and compliance with the licence for any future desludging activities which may take place. While the current licence includes a notification requirement for desludging activities, there is no further wording regarding the activity as a premises operation. The below is suggested as a suitable addition, being taken from a comparable licence.
  - *1.3.X The Licence holder must dispose of sewage sludge and biosolids in accordance with the Biosolids guidelines.*
  - *1.3.X Where sewage sludge is temporarily stored on-site, the Licence holder must direct sewage sludge to a hardstand area or hardstand drying bed which:
 
    - *is adequately bunded to prevent surface runoff of leachate or sludge from crossing the boundary of the premises; and*
    - *returns sludge leachate from the storage area back to the treatment ponds.**
- The licence holder requests the inclusion of monthly averaging in the process requirements description for waste processing in Condition 1.3.3, Table 1.3.2 for consistency with other recent licence renewals.
- The licence holder is seeking to remove Condition 4.1.1 from the licence based on the completion of the Improvement References (IRs) detailed in Condition 4.1.1, Table 4.1.1. As required under IR1 listed in Condition 4.1.1, Table 4.1.1 of Licence L7691/1991/5 the licence holder completed an Environmental Risk Assessment (ERA) (Attachment 3B2) which provided recommendations to identify, manage, and mitigate risks arising from the discharge of wastewater from the premises to the off-site discharge point and associated ephemeral creek.

On 28 May 2024, the Department issued a request for information to the licence holder for more detail on current sludge management practices, the existing drying bed, and the location and method of construction of geobag desludging and dewatering areas. Additional information was received on 21 June 2024. Through the licence holder's provision of additional information, it was ascertained that the hardstand requirements described in the proposed condition relating to temporary sewage sludge storage is yet to be constructed and will not be constructed under this amendment. The licence holder plans to seek a works approval application at a later stage to authorise the construction of this hardstand.

The licence holder advised that last desludging occurred in the 2002-03 reporting period, in which pond one was desludged via the drain and dry method. The pond was bypassed to allow the natural drying of bio-solid matter, which was stored on site for later disposal.

Desludging of pond one is flagged to occur in the 25/26 financial year. The licence holder has proposed that, as done previously, pond one will be desludged using the drain and dry method. This will be performed during a period of dry months where, with seasonally low inflows the plant will continue to operate while still meeting treatment performance requirements. Once dry the sludge will be disposed directly from the pond to a facility licensed to accept Class II or Class III putrescible waste; or disposed according to the *Western Australian Guidelines for Biosolids Management 2012*. The facilities closest to Three Springs WWTP capable of receiving such waste are Jurien Waste Management Facility and Meru Waste Disposal Facility, which are equidistant from the site.

Ponds two and three are forecast to be desludged within the next five to six years via dredging. This entails the dewatering of the dredged sludge stored in geobags in the hardstand area. The hardstand in its current condition does not meet the specification for dredging and will require bunding, lining, and grading. Depending on the height of the hardstand relative to the ponds the collected leachate will either be pumped back to the process or returned via gravity feed. The works required to bring the hardstand up to specification will require works approval and will need to take place prior to ponds two and three being desludged.

Dredging is an on-line method in which the pond continues to receive wastewater inflows and perform treatment functions. The desludging is performed by floating equipment which collects the sludge from the operational pond via pumping, typically to geobags for dewatering. The sludge is dosed with a diluted polymer to provide improved sludge-water separation allowing dewatering once in the geobag. The use of a dredge and geobags is the preferred method of online desludging, with geobags allowing the deferral of sludge disposal, providing drier sludge. Geobags used for dewatering sludge are typically 7 metre by 20 metre woven polypropylene bags designed to retain solids and pass liquid.

Geobags must be placed in a bunded area that ideally drains by gravity back into the pond being desludged, or to the first pond in the treatment series. In normal dewatering conditions the bund walls need only to retain shallow flow. The bund must have a plastic liner during geobag filling. A compacted gravel hardstand is suitable as a bund if also fitted with a 'temporary' plastic liner using silage cover.

The water returned from the geobags is important for maintaining the pond level during desludging. The bund should have a slope of 1:200 along the length of the bag only, with greater slopes reduce the bag fill capacity. Any side-slope may allow the geobags to roll or twist, distorting the bag and reducing its fill capacity. The bunded area should allow a minimum 8 metres width and 21 metres length for each standard 7 m wide by 20 m long geobag. For best drainage, geobags can be laid out on top of an approved 'drainage mat' material to allow water to exit the underside of the geobag; an important part of sludge dewatering.

**Key findings: The Delegated Officer has determined the following:**

- The proposed condition relating to the disposal of biosolids in accordance with the Biosolids guidelines is unenforceable. Further, there is not adequate infrastructure at the premises to treat and store accumulated biosolids to relevant pathogen gradings as set out in the Western Australian guidelines for biosolids management, prior to offsite removal.
- A condition requiring the disposal of sewage sludge and biosolids produced at the premises to a suitably licensed waste facility will have the same intent as what is proposed by the licence holder.
- It is noted that the hardstand area for temporary sewage storage, as described in the licence holders proposed condition for insertion in the amendment licence, is yet to be constructed. The department cannot authorise the use of infrastructure which has not been constructed under licence, and as such cannot incorporate this proposed condition into the amended licence.
- The construction and use of upgraded hardstand infrastructure will need to be assessed through a separate works approval, with requirements for a construction compliance assessment to be submitted and reviewed to ensure that the hardstand has been constructed and is fit for purpose. The ongoing use of any upgraded hardstand is to be assessed and endorsed through a future licence amendment.

### 2.3 Consolidation of Licence

As part of this amendment package the department has consolidated the licence by incorporating changes made under the Amendment Notices summarised in Table 1.

**Table 1: Licences consolidated in this amendment.**

Instrument	Issued	Summary of approval
L7691/1991/5	16/10/2014	Current licence.
L7691/1991/5	29/04/2016	Amendment Notice extending licence expiry date out to 25 October 2036.
L7691/1991/5	16/05/2022	Amendment Notice reducing Environmental Report submission to 01/10/2022 and biennially thereafter.

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.

In consolidating the licence, the CEO has:

- updated the format and appearance of the licence;
- deleted the redundant AACR form set out in Schedule 1 of the previous licence and advised the licence holder 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.

The full consolidation of licence conditions as they relate to this revised licence are detailed in Section 5.1. Previously issued Amendment Notices will remain on the department’s website for future reference and will act as a record of the department’s decision making.

### 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 Table 2 below.

Table 2 also details the control measures which the licence holder has proposed to assist in controlling these emissions, where necessary.

**Table 2: Licence Holder controls.**

Emission	Sources	Potential pathways	Proposed controls
Odour	Receipt and treatment of reticulated sewage inflows.  Online desludging activities using geobags.  Offline drain and dry desludging.	Air/windborne pathway	Physical separation from receptors.
Sludge filtrate (dissolved nutrients, metals, BOD)	Online desludging activities using dredge geobags.	Overland flow and infiltration through soil profile resulting on nutrient contamination	Yet to be constructed bunded hardstand constructed to achieve a hydraulic conductivity of less than $1 \times 10^{-9}$ m/s.  Hardstand in its current condition on site does not meet the specification for dredging and will require bunding, lining, and grading.  The works to bring the hardstand up to specification will require a works approval from DWER and will need to take place prior to ponds two and three being desludged.
Secondarily treated effluent	Direct discharge to non-perennial watercourse/Minor tributary.	Direct discharge to stream, seepage to soils and	Discharge only during wet winter months.  Stock fence around the discharge point.

Emission	Sources	Potential pathways	Proposed controls
		groundwater	

### 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 holders 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)). The proximity of identified receptors relative to the premises is depicted in Figure 1.

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

Receptor ID	Human receptors	Distance from prescribed activity
H1	Yarra Yarra Lakes - registered Mythological, Natural Feature	Premises located within mapped extent (purple hatching).
H2	Residential Premises, Water Street, Three Springs	Approximately 400 northwest of the ponds.
H3	Three Springs Short Stay caravan Park, 5 Hunt Street, Three Springs	Approximately 550 metres northwest of the ponds.
H4	Rural premises, Railway Road, Kadathinni	Approximately 480 m southeast of southern premises boundary.
H5	Three Springs Aquatic Centre, Crn of Hall and Mayrhofer Streets, Three Springs	Approximately 550 metres northwest of the ponds.
H6	The Three Springs Council, 132 Railway Road, Three Springs	Approximately 600 metres northwest of the ponds.
H7	Three Springs Primary School, 30 Carter Street, Three Springs	Approximately 850 metres northwest of the ponds.
Receptor ID	Environmental receptors	Distance from prescribed activity
E1	Non perennial watercourse/Minor tributary draining to hypersaline Yarra Yarra Lakes (nor part of R 26442 Yarra Yarra Lakes Nature Reserve 1.8km to the south)	Directly adjacent to southwest premises boundary – receiving direct discharge from premises.
E2	Agricultural cropping and grazing land, Kadathinni	Directly east and southeast of premises boundary.

E3	Grazing livestock	Potential for livestock to access creek line receiving direct discharge from premises noting that livestock are not granted access to the paddock when treated wastewater is being discharged (A visit to the Three Springs WWTP on the 2nd of November 2023 confirmed that the landowner had installed a wire stock fence around the wastewater discharge point to prevent stock access)
E4	Priority 3 Threatened Ecological Community 'Eucalypt woodlands of the Western Australian Wheatbelt'	Approximately 370 m northwest of premises pond system, access road transects buffer.





**Figure 1: Premises location (lime green) in relation to sensitive receptors.**

## 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 considers 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 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 L7691/191/5 that accompanies this amendment report authorises emissions associated with the operation of the premises i.e. operation of a sewage treatment plant.

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 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				
Receipt and treatment of reticulated sewage inflows in pond system	Odour	Air/windborne pathway causing impacts to health and amenity	Rural residence Three Springs Township	Refer to Table 2	C =Slight L = Possible <b>Low Risk</b>	Y	Condition 5	N/A
Desludging activity involving pond drainage	Odour	Air/windborne pathway causing impacts to health and amenity	Rural residence Three Springs Township	Refer to Table 2	C =Slight L = Possible <b>Low Risk</b>	Y	Condition 10 and 26	N/A
Direct discharge of treated effluent during winter months	Secondarily treated effluent (dissolved nutrients, metals, BOD)	Direct discharge causing ecosystem disturbance or impacting surface water quality.	Vegetation associated with non-perennial watercourse / Minor tributary (draining to hypersaline Yarra Yarra Lakes)	Refer to Table 2	C = Slight L = Unlikely <b>Low Risk</b>	Y	Conditions 11 and 17	N/A

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.

## 4. Consultation

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

**Table 5: Consultation.**

Consultation method	Comments received	Department response
Shire of Three Springs advised of proposal on 02/07/2024	<ol style="list-style-type: none"> <li>1. Public Health and Environmental Risk: We note the DoH's endorsement of the current wastewater discharge method and agree with the assessment that the risk to public health is low, given the ephemeral nature of the creek and its limited public accessibility.</li> <li>2. Environmental Management Practices: The Shire acknowledges the proactive steps taken by the Water Corporation to manage environmental risks, particularly installing the stock fence around the discharge point and effectively handling wastewater volumes during warmer months through evaporation.</li> <li>3. Licence Conditions: Based on the information provided and the current low-risk status, we concur with Water Corporation's assessment that the improvements specified in Condition 4.1.1 (Table 4.1.1) have been met. Therefore, we support the removal of these conditions from the licence, reflecting the effective management practices at the WWTP.</li> </ol>	Noted.
Department of Health (DoH) advised of proposal on 02/07/2024	The DOH has no objection to the proposal as the discharge site is located in a remote area with restricted public access.	Noted.
Department of Planning, Lands, and Heritage (DPLH) advised of proposal on 02/07/2024	<ol style="list-style-type: none"> <li>1. The granting of the licence amendment does not impact the Aboriginal heritage of the area.</li> <li>2. Given that the approval of the licence amendment may facilitate development in the area, the proponent needs to be made aware that any works they propose may require approval under the <i>Aboriginal Heritage Act 1972</i> (AHA). They are required to come to Aboriginal Heritage Conservation for further advice.</li> <li>3. It should be emphasised to the proponents that the granting of the licence amendment does not count as approval for works under the AHA.</li> </ol>	<p>Noted.</p> <p>The provided advice to the licence holder has been included in this decision report.</p>

Bundi Yamati Aboriginal corporation advised of proposal on 02/07/2024	No comments received.	N/A
Licence holder was provided with draft amendment on (02/08/2024)	Refer to Appendix 1	Refer to Appendix 1

## 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 and Table 7 provide 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
Cover page	Duration extended to 25 October 2036.
Licence history	Licence history updated.
5, Table 1	Waste acceptance table updated to reflect premises operations.
6, Table 2	Waste processing table updated, and monthly average inserted under process requirements.
10	New sludge disposal condition inserted.
-	Former improvement condition and table deleted.
22	Updated AACR condition inserted.
23	Updated complaints management system condition inserted.
24	Amended to reflect reduced (biennial) environmental reporting requirement.
24, Table 9	Table amended to reflect discharge of waste to creek.
25	Reference to annual reporting deleted.
26, Table 10	Reference to annual reporting amended to biennial.
27, Table 11	Reference to improvement program deleted.
Definitions, Table 12	Australian standards definitions inserted (referenced in condition 14).
Figure 1	Updated figure inserted.

**Table 7: Consolidation of licence conditions in this amendment**

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Expiry Date: 25 October 2019	Expiry Date: 16 October 2036	In accordance with the Notice of Amendment of Licence Expiry Dates (29/04/2016)
1.1.1 1.1.2	Interpretation and definitions	N/A Interpretation section, Definitions and Table 1	Redundant condition. Revised to current licensing format.
1.1.3	Australian or other standard	N/A Interpretation section, Definitions and Table 1	Redundant condition. Revised to current licensing format.
1.1.4	Reference to code of practice	N/A Interpretation section, Definitions and Table 1	Redundant condition. Revised to current licensing format.
1.2.1	Pollution control and monitoring equipment	1	Revised to current licensing format.
1.2.2	Recovery and removal of spills	2	Revised to current licensing format.
1.2.3	Prevention of contamination and containment of contaminated stormwater	3	Revised to current licensing format.
1.3.1	Record and investigate exceedances of limits or targets	4	Revised to current licensing format.
1.3.2 Table 1.3.1	Waste acceptance	5 Table 1	Condition wording updated. Revised to current licensing format.
1.3.3 Table 1.3.2	Waste processing	6 Table 2	'Monthly average' added to requirements. Revised to current licensing format.
1.3.4 Table 1.3.3	Containment Infrastructure	7 Table 3	Revised to current licensing format and in-text reference to Figure inserted.
1.3.5	Management of ponds	8	Revised to current licensing format.
1.3.6	Security	9	Revised to current licensing format.

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Sludge disposal	10	New condition added.
2.1.1	Limit exceedances	11	Revised to current licensing format.
2.2.1 Table 2.2.1	Emissions to surface water	12 Table 4	Revised to current licensing format, table 4 updated to reflect revised figure 2.
3.1.1	Water sampling standards	13	Revised to current licensing format.
3.1.2	Monitoring timeframes	14	Revised to current licensing format.
3.1.3	Calibration	15	Revised to current licensing format.
3.1.4	Actions where calibration cannot be met	16	Revised to current licensing format.
3.2.1 Table 3.2.1	Monitoring of point source emissions to surface water	17 Table 5	Revised to current licensing format and in-text reference to relevant figure inserted.
3.3.1 Table 3.3.1	Monitoring of inputs and outputs	18 Table 6	Revised to current licensing format. Monitoring point references updated to match Figure 1, and in-text reference inserted.
3.4.1 Table 3.4.1 and Table 3.4.2	Monitoring of ambient surface and groundwater quality	19 Table 7 and Table 8	Monitoring point references updated to reflect Figure 2 and in-text references inserted.
4.1.1	Improvements	N/A	Deleted from revised Licence.
5.1.1	Information requirements	20	Revised to current licensing format.
5.1.2	Person in charge of premises	21	Revised to current licensing format.
5.1.3	AACR	22	Condition wording updated. Revised to current licensing format.
5.1.4	Complaints	23	Condition wording updated. Revised to current licensing format.

Existing condition	Condition summary	Revised licence condition	Conversion notes
5.2.1 Table 5.2.1	Reporting	24 Table 9	Condition wording updated. Revised to current licensing format.
5.2.2	Environmental report requirements	25	Revised to current licensing format.
5.2.3 Table 5.2.2	Non-annual reporting requirements	26 Table 10	Condition wording updated. Revised to current licensing format.
5.3.1 Table 5.3.1	Notification	27 Table 11	Revised to current licensing format.
Schedule 1: Maps	Premises map	Schedule 1: Maps	Premises map updated.
Schedule 2: Reporting & notifications	Annual Audit Compliance Report Form N1 Notification	N/A	Redundant attachment. Deleted from Licence Forms accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
N/A	Premises boundary	Schedule 2	Coordinates incorporated into new Schedule 2.
N/A	Forms	Schedule 3	Form N1 Notification moved to new Schedule 3.

## 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 risk assessment and draft conditions

Reference	Draft text	Requested Amendment (bold and red text)	Additional Comments and/or Justification	Department's response
Cover page	Licence number L7691/191/5	Licence number <b>L7691/1991/5</b>	Correcting typo in licence number.	Noted. Typo in licence number corrected.
Cover page	ACN 28 033 434 917	<b>ABN 28 003 434 917</b>	Correcting typo and Water Corporation has an ABN.	Noted. Reference corrected.
Condition 10	The licence holder must dispose of sewage sludge and biosolids produced at the premises to a suitably licensed waste facility.	The licence holder must dispose of sewage sludge and biosolids produced at the premises to a suitably licensed waste facility, <b>or where appropriate, recycle in adherence with the guidelines for biosolids management</b>	To minimise waste going to landfill, biosolids are preferred to be recycled. The suggested wording requests this condition is expanded to include the option of recycling given potential risks to environment and public health are minimised.	Noted. The Delegated Officer has reviewed the <i>Western Australian guidelines for biosolids managements December 2012</i> (Biosolids guidelines) in response to the Licence Holders comments. Biosolids are defined in the Biosolids guidelines as ' <i>Sludge from a wastewater treatment plant that has undergone further treatment to reduce disease causing pathogens and volatile organic matter significantly, resulting in a stabilised material suitable for beneficial use</i> '. Additionally, the Biosolids guidelines state that all sludges are assumed to be pathogen grading P4 unless proven otherwise, which cannot be used for application to land. Treatment processes for higher (i.e. lower contaminant loading) pathogen gradings are detailed in Table 2 of the Biosolids guidelines.

Reference	Draft text	Requested Amendment (bold and red text)	Additional Comments and/or Justification	Department's response
				<p>No treatment processes are in place at the premises to reduce pathogen concentrations in sludges, and no infrastructure currently exists at the premises to facilitate the treatment of a sludge into a Biosolid.</p> <p>Therefore, the Delegated Officer does not consider that sludges produced at the premises can be considered as Biosolids and does not consider the inclusion of an allowance for the recycling of biosolids within licence conditions appropriate.</p> <p>Additionally, reference to 'biosolids produced at the premises' has been removed from licence conditions.</p>
Condition 17, Table 5	Nitrate + Nitrite – nitrogen	Nitrate + <b>Nitrite</b> – Nitrogen	In existing licence under monitoring of point source emissions to surface water (cond 3.2.1, Table 3.2.1), we monitor Nitrate + Nitrite – Nitrogen.	Noted. Typo corrected.
Condition 18, table 6	Nil	<b>Parameter1</b> <b>Note 1: In-situ non-NATA accredited analysis permitted</b>	Missing in new licence at the base of Table 6.	Noted. Annotation inserted.
Condition 22 (b)	The licence holder must: (a) Undertake an audit of their compliance with the conditions of this licence and the preceding annual	The Licence Holder must: (a) Undertake an audit of their compliance with the conditions of this licence <b>during</b> the	The proposed wording of the condition is consistent with other licences and removes the 2022 date which has been passed.	Noted. Wording amended.

Reference	Draft text	Requested Amendment (bold and red text)	Additional Comments and/or Justification	Department's response
	period; and  (b) Prepare and submit to the CEO an Annual Audit Compliance Report for that period in the approved form by 01/10/2022 and annually thereafter.	preceding annual period; and  (b) Prepare and submit to the CEO an Annual Audit Compliance Report in the approved form by <b>1 October</b> each year.		
Definitions – annual period	a 12-month period commencing from 1 July until 30 June 1 July until 30 June of the immediately following year.	a 12-month period commencing from 1 July until 30 <del>June 1 July until 30 June</del> of the immediately following year.	Correcting repeated phrase typo.	Noted. Typo corrected.
Schedule 1, Figure 3	Figure 3: Monitoring points	Remove	Monitoring bore locations are captured in Figure 1 premises map.	Figure 3 provides higher resolution map for use during premises inspections  In-test references to relevant tables from Schedule 1 inserted.
Schedule 2	Schedule 2: Premises Boundary	To be included in definitions or included in schedule 1 (with reference to the prescribed premises boundary map)	Schedule 2 is not currently referred to anywhere in the document, including definitions.	Noted. Cover page and definitions table amended to accommodate insertion of premises boundary coordinates into licence.

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY				
<b>Application type</b>				
Works approval	<input type="checkbox"/>			
Licence	<input type="checkbox"/>	Relevant works approval number:		None <input type="checkbox"/>
		Has the works approval been complied with?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Has time limited operations under the works approval demonstrated acceptable operations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Date Report received:		
Renewal	<input type="checkbox"/>	Current licence number:		
Amendment to works approval	<input type="checkbox"/>	Current works approval number:		
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L7961/1991/15	
		Relevant works approval number:	N/A	<input checked="" type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:	None	<input type="checkbox"/>
Date application received	10/05/2024			
<b>Applicant and Premises details</b>				
Applicant name/s (full legal name/s)	Water Corporation			
Premises name	Three Springs Wastewater Treatment Plant			
Premises location	Water Street THREE SPRINGS WA 6519 Lot 20 on Diagram 73005			
Local Government Authority	Shire of Three Springs			
<b>Application documents</b>				
HPCM file reference number:	DWERDT946243			
Key application documents (additional to application form):	<i>Application form</i> <i>Cover letter</i> <i>Att 3B1 Supporting information</i> <i>Att 3B2 Three Springs ERA</i> <i>Att 3B3 L7691 ERA Review response</i> <i>Att 3B4 Three Springs WWTP Metals Analysis</i> <i>Att 3B6 WWS and GWR health Advisory committee Jan 2022</i> <i>Att 3B5 DoH correspondence Three Springs</i>			
<b>Scope of application/assessment</b>				

<p>Summary of proposed activities or changes to existing operations.</p>	<p><i>Licence amendment</i></p> <p>Proposed amendments are for the following conditions:</p> <ul style="list-style-type: none"> <li>• Condition 1.3</li> <li>• Condition 1.3.3, Table 1.3.2</li> <li>• Condition 4.1.1, Table 4.1.1</li> </ul> <p>Water Corporation has prepared this amendment to summarise previous correspondences and measures taken to fulfill the requirements of the two Improvement References (IR) listed under condition 4.1.1. DWER were previously consulted on recommendations produced by a, environmental risk assessment completed to address the requirements of the two IRs.</p> <p>It was agreed in principle the recommendations fulfilled the requirements of the two IRs. To complete the assessment Water Corporation were further required to provide indicative dates for the completion of the recommendations and summarise consultation with the Department of Health in relation to discharge into the ephemeral creek. This information has been provided and evidenced in the attachments submitted with this application.</p> <p>Water corporation also notes that while the current licence includes a notification requirement for removal of sewage sludge, however there is no other wording on the licence regarding desludging. This amendment also requests the inclusion of wording surrounding desludging as a premises operation. The intention is to ensure adequate coverage and compliance with the licence for any future desludging activities.</p> <p>Please see the attached Licence Amendment Form and attachments for further information. The supporting information (Attachment 3131) details the requested amendments to the licence and contextualises the</p> <p>further attachments (Attachments <b>3132 — 3136</b>) which evidence the completion of the requirements of IR1 and IR2.</p>
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**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
<p>Category 54: Sewage facility premises –</p> <p>(a) on which sewage is treated (excluding septic tanks); or</p> <p>(b) from which treated sewage is discharged onto land or into waters</p>	<p>200 cubic metres per day</p>	<p>No proposed change</p>

**Legislative context and other approvals**

<p>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?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Referral decision No:                  Managed under Part V <input type="checkbox"/>                  Assessed under Part IV <input type="checkbox"/></p>
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Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input checked="" type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Approval: Expiry date: If N/A explain why? Reserved for Public Purposes
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"/>	CPS No: N/A No clearing is proposed.
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"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
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"/>	Application reference No: Licence/permit No: Licence / permit not required.
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"/>	Name: N/A Type: Proclaimed Groundwater Area/Surface Water Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office: Swan Avon / Mid-West Gascoyne / Kwinana Peel / North West / South West / Goldfields / South Coast
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u> )? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

<p>Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>THREE SPRINGS-SEWER is listed in CWTS as a controlled waste – waste facility</p>
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Classification: N/A Date of classification: N/A</p>