



Application for Licence Amendment

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

Licence Number	L8039/1994/3
Licence Holder	Water Corporation
ACN	28 003 434 917
File Number	2010/003340-1~2
Premises	North Geraldton Wastewater Treatment Plant Via Glenfield Beach Drive GLENFIELD WA 6532 Legal description – Being Lot 21 on Plan 19887 as defined by the premises map attached to the revised licence
Date of Report	20 March 2023
Decision	Revised licence granted

Steve Checker
**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 L8039/1994/3 is held by the Water Corporation (licence holder) for the North Geraldton Wastewater Treatment Plant (the premises), located at Lot 21 on Plan 19887, Glenfield, WA.

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 L8039/1994/3 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. 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 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 18 November 2022, the licence holder submitted an application to the department to amend licence L8039/1994/3 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Sludge drying bed infrastructure and operation approval, including approval to store geobags (containing sludge) in the sludge drying bed.
- Construction of a PVC pipe leachate drain that directs leachate from the southeast corner of the lined sludge drying bed to the inlet section of the adjacent primary facultative pond (Pond 1A) via gravity.
- Removal of geobags containing dried sludge (biosolids) to a licenced facility.

The sludge drying bed was constructed in 2021 without authorisation and consists of a:

- 25 m wide by 70 m long sludge drying bed (geobag lay down area)
- 500 mm wide x 300 mm high embankment
- Compacted base
- LLDPE (Linear Low-density Polyethylene) 1.00 mm liner with 'L' shape anchors. The liner has a permeability of 2×10^{-10} m/s.

The applicant notified the department of the sludge drying bed construction on 17 November 2022. The operation of the sludge drying bed will allow the licence holder to remove and dry sludge formed during wastewater treatment, which is essential for it to be safely disposed of, and to maintain effluent treatment quality. The construction of a leachate drain will ensure leachate collected in the sludge drying bed liner is directed back to the primary facultative pond (Pond 1A).

The design capacity and throughput remain unchanged.

Additionally, the licence holder is requesting a change to the following reporting requirements:

- Annual Environmental Report (AER) to be submitted on 1 October annually
- Annual Audit Compliance Reports (AACR) to be submitted on 1 October 2024 and annually thereafter.

The Delegated Officer considers that the change in reporting date does not impact the risk profile of the premises and does not need a detailed assessment. AACRs are required to be submitted annually; therefore, the DO considers that a 1 October 2023 submission is required with 1 October annual submissions going forward.

In amending the licence, the CEO has also:

- updated the format and appearance of the licence;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

All changes as they relate to this revised licence are detailed in Section 4.1.

The department has not undertaken any additional risk assessment of the premises related to previously assessed activities.

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 1 below.

Table 1 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Licence holder controls

Emission	Sources	Potential pathways	Proposed controls
Leachate	Leakage from the sludge drying bed from stored geobags	Infiltration through soil to groundwater, potentially altering underlying groundwater and surface water quality (Indian Ocean)	<p>Leachate from the sludge drying bed is returned to Pond 1A through a PVC pipe drain (leachate drain) via gravity.</p> <p>Inspections of sludge drying beds are undertaken and if found not compliant with WQPN26, the liner and sludge drying beds are reconstructed/replaced prior to desludging events.</p> <p>Dredging is not carried out during rainfall events.</p> <p>The base of the sludge drying bed is compacted and lined with a 1.00mm LLDPE (Linear Low-density Polyethylene) liner with a permeability of 2×10^{-10} m/s.</p> <p>An embankment surrounds the sludge drying bed.</p>
Leachate	Leakage from proposed leachate drain due to pipe damage, defects, or faulty seals	Infiltration through soil to groundwater, potentially altering underlying groundwater and surface water quality (Indian Ocean)	None specified.
Noise	Construction of Leachate Drain	Air/windborne pathway causing impacts to health and amenity	None specified.
Dust			None specified.
Odour	<p>Desludging of containment ponds involving pumping wet sludge into geobags located on sludge drying beds</p> <p>Storage of sludge in the temporary sludge drying bed.</p>	Air/windborne pathway causing impacts to health and amenity	Controls within the existing licence apply

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 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 housing and buildings	The closest being approximately 329 m east northeast and east, 435 m east southeast and 510 m southeast. (Measurements are taken from the southeast corner of the sludge drying bed to the buildings on the residential properties).
Vacant residential zoned land	One Lot adjacent to - and another Lot approximately 255 m from the premises boundary on the northeast corner.
Civic and cultural zoned premises	Approximately 261 m east of the premises boundary. No construction as yet.
Special use zoned area (Lifestyle Village)	Approximately 175 m south of the premises boundary. No construction as yet.
Environmental receptors	Distance from prescribed activity
Indian Ocean	Approximately 288 m west southwest of the northwestern corner of the sludge drying bed boundary.
Groundwater	There are 3 groundwater bores located within 1 km of the premises: Groundwater bore (Site Id. 20003013) located approximately 226 m southeast of the premises, identifies groundwater at approximately 3 mBGL, with a TDS of 2,800 mg/L. It is used for agricultural purposes. Groundwater bore (Site Id. 23043810) located approximately 932 m north of the premises boundary, identifies groundwater at approximately 4.1 mBGL with a TDS of 21,000 mg/L. Groundwater bore (Site Id. 14111032) located within the premises on the eastern boundary identifies groundwater at 9.5 mBGL with a TDS of 7404 mg/L. Geraldton North Wastewater Treatment Plant (WWTP) groundwater bores (Site Id. 1/97, 2/97, 3/97, 4/97, 5/97 and 6/97) are located within the premises boundary.

	<p>Groundwater depth of on-site bores, measured in May 2022 (Tape Ridge from Top of Casing (TOC)):</p> <p>Groundwater bore (Site Id. 1/97) identifies groundwater at 8.47 m with a TDS of 1300mg/L</p> <p>Groundwater bore (Site Id. 2/97) identifies groundwater at 8.47 m with a TDS of 1690 mg/L</p> <p>Groundwater bore (Site Id. 3/97) identifies groundwater at 8.54 m with a TDS of 3360mg/L</p> <p>Groundwater bore (Site Id. 4/97) identifies groundwater at 8.54 m with a TDS of 1490 mg/L</p> <p>Groundwater bore (Site Id.) 5/97 identifies groundwater at 12.4 m with a TDS of 11460 mg/L</p> <p>Groundwater bore (Site Id. 6/97) identifies groundwater at 12.4 m with a TDS of 2180 mg/L</p>
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If leachate reaches the soil, it has the potential to impact the underlying groundwater quality, which also has the potential to affect surface water quality (Indian Ocean).

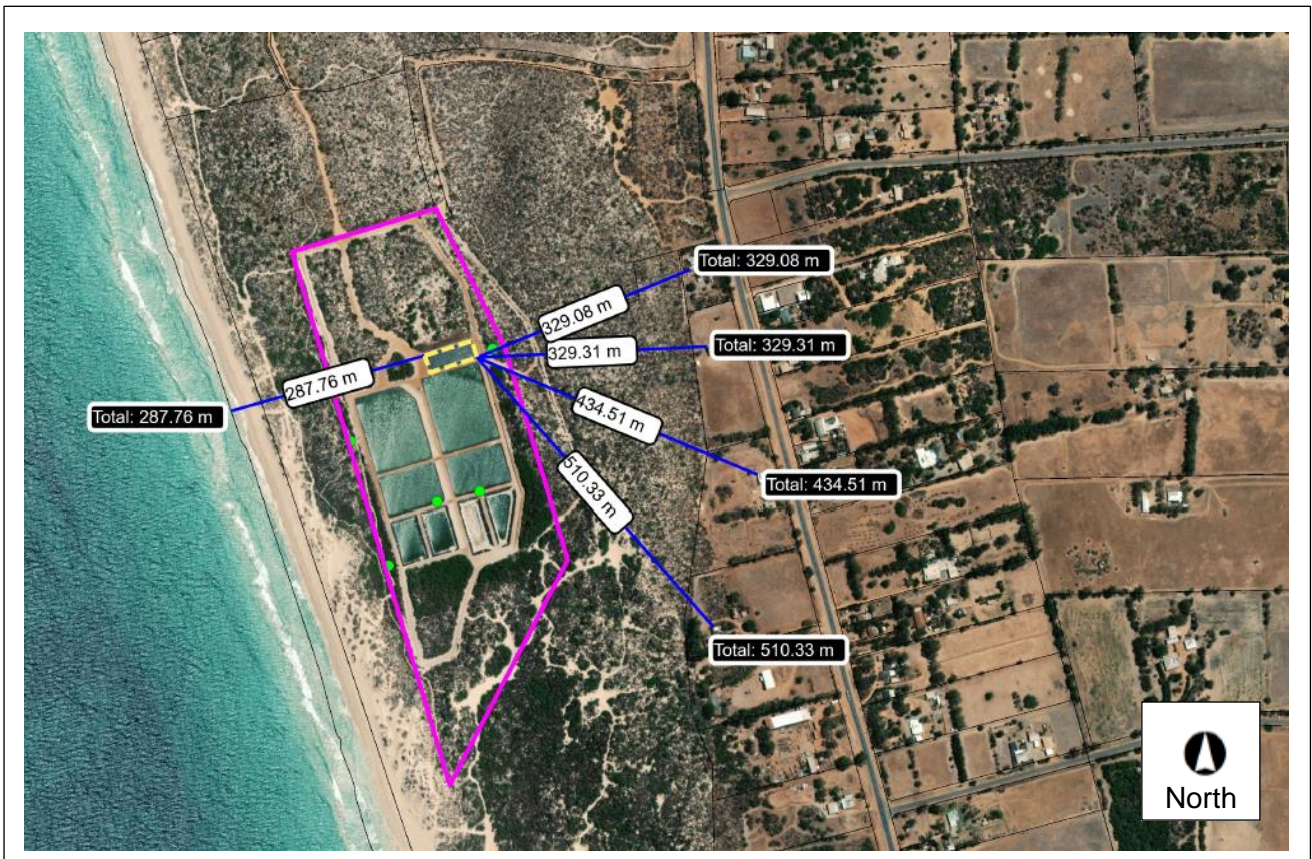


Figure 1: Distance to sensitive human and environmental receptors.

Note: The pink line denotes the premises boundary, and the yellow dashed line denotes the sludge drying bed boundary.

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 3.

The revised licence L8039/1994/3 that accompanies this amendment report authorises emissions associated with the operation of the premises i.e. construction and operation of the sludge drying bed and leachate drain.

The conditions in the revised licence 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 construction and operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls				
Construction								
Construction of underground leachate drain (PVC pipe drain) Vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residential housing and buildings - the closest being ~329 m east northeast and east, ~435 m east southeast and ~510 m southeast.	Refer to Table 1	C = Slight L = Unlikely Low Risk	Y	N/A	The construction is minor and of limited duration, therefore no additional controls have been applied.
	Noise			Refer to Table 1	C = Slight L = Unlikely Low Risk	Y	N/A	The construction is minor and of limited duration, therefore no additional controls have been applied. In the event of any noise impacts, noise emissions are adequately regulated by the provisions of the <i>Environmental Protection (Noise) Regulations 1997</i> .
Operation								
Draining of leachate from the sludge drying bed via the leachate drain to Pond 1A	Nutrient rich leachate and suspended sediment due to failure of the leachate drain to contain leachate	Infiltration through soil to groundwater, changing groundwater chemistry and potentially causing ecosystem disturbance via migration to surface water (Indian Ocean)	Indian Ocean ~288m west southwest Groundwater 3m-4.1 mBGL within 1 km of premises and 8.47-12.4 m (tape ridge from TOC) within premises boundary	Refer to Table 1	C = Minor L = Rare Low Risk	N	Condition 10	Specifications for the leachate drain construction, location, maintenance, and operation have been set to mitigate risks associated with emissions and discharges to the receiving environment. The addition of the leachate drain does not further alter the risk of leachate emissions, providing leachate drain is well sealed and leachate is contained within the drain.
Storage of geobags (containing sludge) in sludge drying bed	Nutrient rich leachate and suspended sediment due to damaged liner or damaged geobags in sludge drying bed.	Infiltration through soil to groundwater, changing groundwater chemistry and potentially causing ecosystem disturbance via migration to surface water (Indian Ocean)		Refer to Table 1	C = Minor L = Rare Low Risk	Y	Condition 9 and Condition 10	Specifications for the sludge drying bed size, location, liner, maintenance, and operation have been set to mitigate risks associated with emissions and discharges to the receiving environment. The addition of the sludge drying bed does not further alter the risk of leachate emissions, providing it is contained and is returned to Pond 1A for retreatment.

Licence: L8039/1994/3

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls				
	Odour	Air/windborne pathway causing impacts to health and amenity	Residential housing and buildings – the closest being ~329m east northeast and east, ~435m east southeast and ~510m southeast.	Refer to Table 1	C = Slight L = Unlikely Low Risk	Y	Conditions 2, 4, 7, 9 and 16	No additional controls added as existing general conditions listed are sufficient to manage the risk.
Desludging activities – dredging of sludge into geobags within sludge drying bed	Odour	Air/windborne pathway causing impacts to health and amenity	Residential housing and buildings – the closest being ~329m east northeast and east, ~435m east southeast and ~510m southeast.	Refer to Table 1	C = Slight L = Unlikely Low Risk	Y	Conditions 2, 4, 7, 9, 16 and 33	No additional controls added as existing general conditions listed are sufficient to manage the risk.

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. 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 4 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Licence as part of the amendment process.

Table 4: Summary of licence amendments

Condition no.	Proposed amendments
N/A	Licensee reworded to 'licence holder'.
N/A	'Shall' reworded to 'must'.
N/A	Deletion of Introduction – revised to current licensing format.
N/A	Insertion of 'Infrastructure and equipment' heading.
N/A	Prescribed premises category table revised to current licensing format – deletion of category production or design capacity column. 'Approved premises production or design capacity column heading changed to 'Assessed design capacity'.
N/A	Licence history table updated to include 04/08/2017 licence amendment and this amendment.
N/A	Interpretation section updated to new wording format and revised to current licensing format.
N/A	Definitions for 'Fugitive emissions' and 'Act' have been removed as they are no longer required. The definition for 'EP Act' replaces 'Act'. The definitions list has been moved to Table 12 at the end of the conditions.
N/A Table 12	Definitions for 'annual period', 'CEO', 'Licence', 'Licensee' and 'Premises' have been updated to the new wording format.
N/A Table 12	Insertion of definitions for 'prescribed premises', 'sludge', 'EP Act', 'EP regulations', 'emission', 'discharge', 'Department', 'books' and 'AS/NZS 2031'.
N/A	Table 1.3.1. (Table 1) 'Putrescible and Organic wastes' row removed.
Condition 9 Table 3	Insertion of 2 rows in Table 3 to include sludge drying bed infrastructure requirements and operation.
<u>Condition 10</u> <u>Table 4</u>	Insertion of Condition 10 and Table 4 to include sludge drying bed infrastructure requirements and operation.
<u>Condition 10</u> <u>Table 4</u>	Construction of a PVC pipe leachate drain that directs leachate from the southeast corner of the lined sludge drying bed to the adjacent primary facultative pond (Pond 1A) via

	gravity.
Condition 9 Table 3	Removal of geobags containing dried sludge (biosolids) to a licenced facility.
N/A	'Emissions' headings changed to 'Emissions and discharges' – update to wording format.
2.2-2.4	Deletion of redundant conditions.
2.6	Deletion of redundant condition.
2.8	Deletion of redundant condition.
3.2-3.4	Deletion of redundant conditions.
3.7	Deletion of redundant condition.
3.9	Deletion of redundant conditions.
N/A	'Improvements' heading deleted – no conditions in this section.
N/A	'Information' heading deleted and updated to 'Records and reporting'.
Condition 26	New numbering. Note: AACR reporting date changed to 1 October annually.
Condition 27	Replaces condition 5.1.4 – New numbering and update to new wording format.
Condition 28	New condition added – Revised to current licensing format.
Condition 29	New condition added – Revised to current licensing format.
Condition 30	Change to the Annual Environmental Report (AER) reporting date – to be submitted on 1 October annually. Table 9 has been updated as LR and AGWQ1 forms referred to in Table 9 are redundant.
Condition 33	Table 11 (Note 2) has been updated – forms are available on the Department's website.
N/A	Conversion of the licence to the new format and reissue of licence.
Schedule 1: Maps Figure 1	Previous premises map replaced with updated version.
Schedule 1: Maps Figure 2	Updated premises map including sludge drying bed location.
Schedule 1: Maps Figure 3	Map of containment infrastructure and monitoring locations replaced with updated version (includes sludge drying bed).
Schedule 2: Reporting and notification forms	Redundant attachments. Deleted from Licence. Forms accessed at www.dwer.wa.gov.au N1 form retained and updated to new format.

Table 5: Consolidation of licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Introduction	Deleted	Redundant.
N/A	Prescribed premises category table	N/A	Revised to current licensing format – deletion of category production or design capacity column. 'Approved premises production or design capacity' column heading changed to 'Assessed design capacity' as per the revised licencing format.
1.1.1 1.1.2	Interpretation and definitions	N/A Interpretation section, Definitions and Table 12	Redundant conditions. Revised to current licensing format. The definitions for 'Fugitive emissions' and 'Act' have been removed as they are no longer required. The definition for 'EP Act' replaces 'Act'. Definitions for 'annual period', 'CEO', 'Licence', 'Licensee' and 'Premises' have been updated to the new wording format. The definitions list has been moved to Table 12 at the end of the conditions. Definitions for 'prescribed premises', 'sludge', 'EP Act', 'EP regulations', 'emission', 'discharge', 'Department', 'books' and 'AS/NZS 2031' have been added.
1.1.3	Australian or other standard	N/A Interpretation section, Definitions and Table 12	Redundant. Revised to current licensing format.
1.1.4	Reference to code of practice	Moved to Interpretation section, definitions, and Table 1	Redundant condition. Revised to current licensing format.
1.2.1	Emissions	Condition 1	New numbering. Revised to current licensing format.
1.2.2	Pollution control and monitoring equipment	Condition 2	New numbering. Revised to current licensing format.
1.2.3	Storage of environmentally hazardous materials	Condition 3	New numbering. Revised to current licensing format.
1.2.4	Recovery and removal of spills	Condition 4	New numbering. Revised to current licensing format.
1.2.5	Management and containment of contaminated stormwater	Condition 5	New numbering. Revised to current licensing format.
1.3.1 1.3.2 Table 1.3.1	Waste acceptance	Condition 6 and 7 Table 1	New numbering. Revised to current licensing format.

Existing condition	Condition summary	Revised licence condition	Conversion notes
1.3.3 Table 1.3.2	Waste processing	Condition 8 Table 2	New numbering. Revised to current licensing format.
1.3.4 Table 1.3.3	Containment infrastructure – storage and treatment of waste material infrastructure	Condition 9 Table 3	New numbering. Revised to current licensing format. Addition of sludge drying bed requirements in Table 3.
1.3.5	Management of wastewater treatment and infiltration ponds	Condition 11	New numbering. Revised to current licensing format.
1.3.6	Disposal of treated wastewater to the Overflow Collection Area	Condition 12	New numbering. Revised to current licensing format.
1.3.7	Security measures	Condition 13	New numbering. Revised to current licensing format.
2.1.1	Record and investigate exceedances of limits or targets	Condition 14	New numbering. Revised to current licensing format.
2.2-2.4	Point source emissions to air, surface water and groundwater	Deleted	There are no specified conditions relating to point source emissions to air, surface water or groundwater in this section.
2.5.1 Table 2.5.1	Emissions to land	Condition 15 Table 5	New numbering. Revised to current licensing format.
2.6	Fugitive emission	Deleted	There are no specified conditions relating to fugitive emissions in this section.
2.7.1	Odour emissions	Condition 16	New numbering. Revised to current licensing format.
2.8	Noise emissions	Deleted	There are no specified conditions relating to noise in this section.
3.1.1	Sampling requirements	Condition 17	New numbering. Revised to current licensing format.
3.1.2	Monitoring requirements	Condition 18	New numbering. Revised to current licensing format.
3.1.3	Monitoring equipment requirements	Condition 19	New numbering. Revised to current licensing format.
3.1.4	Reporting modification to monitoring methods	Condition 20	New numbering. Revised to current licensing format.
3.2-3.4	Monitoring of point source emissions to air, surface water and groundwater	Deleted	There are no specified conditions relating to monitoring of point source emissions to air, surface water and groundwater in this section.

Existing condition	Condition summary	Revised licence condition	Conversion notes
3.5.1 Table 3.5.1	Monitoring of point source emissions to land	Condition 8 Table 6	New numbering. Revised to current licensing format.
3.6.1 Table 3.6.1	Monitoring of inputs and outputs	Condition 22 Table 7	New numbering. Revised to current licensing format.
3.7	Process monitoring	Deleted	There are no specified conditions relating to process monitoring in this section.
3.8.1 Table 3.8.1	Ambient environmental quality monitoring	Condition 23 Table 8	New numbering. Revised to current licensing format.
3.9	Meteorological monitoring	Deleted	There are no specified conditions relating to meteorological monitoring in this section.
4	Improvements	Deleted	There are no specified improvement conditions in this section.
5.1.1	Records	Condition 24	New numbering. Revised to current licensing format.
5.1.2	Awareness of conditions of the licence	Condition 25	New numbering. Revised to current licensing format.
5.1.3	Annual Audit Compliance Report requirements	Condition 26	New numbering.
5.1.4	Complaints management system	Condition 27	New numbering and update to wording format.
5.2.1 Table 5.2.1	Annual Environmental Report	Condition 30 Table 9	Table 9 (and Note 1 attached to Table 9) have been updated as forms LR and AGQ1 are no longer required. New numbering. Revised to current licensing format.
5.2.2	Annual Environmental Report requirements	Condition 31	New numbering. Revised to current licensing format.
5.2.3 Table 10	Non-annual reporting requirements	Condition 32	New numbering. Revised to current licensing format.
5.3.1 Table 11	Notification requirements	Condition 33	Note 2 in Table 11 has been updated to note that forms are available on the Department's website. New numbering and update to wording format. 'Act' has been updated to 'EP' Act'.
Schedule 1: Maps	Premises map Map of containment infrastructure and monitoring locations	Schedule 1: Maps	New naming convention, maps updated.

Existing condition	Condition summary	Revised licence condition	Conversion notes
Schedule 2 Reporting & notification forms	Annual Audit Compliance Report Proforma LR1 Form AGWQ1 Form Form N1 Notification	Deleted N1 form retained	Redundant attachments. Deleted from licence. Forms accessed at www.dwer.wa.gov.au N1 form has been revised to current licensing format.

References

1. Department of Environment and Conservation (DEC) 2012, *Western Australian Guidelines for Biosolids Management*, Perth, Western Australia
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
5. Water Corporation 2022, *Annual Environmental Report; Geraldton North Wastewater Treatment Plant Part V Licence L8039/1994/3 1 July 2021 to 30 June 2022*, Perth, Western Australia

Appendix 1: Summary of licence holder's comments on risk assessment and draft conditions

Condition	Summary of licence holder's comment	Department's response
Condition 9, Table 3	<p>Remove "Sludge generated from treatment process to be stored within the sludge drying bed only (inside geobags) prior to off-site disposal or reuse to a licensed facility" from Row 7, Table 3 or amend paragraph to "All sludge from desludging activities shall be contained within the sludge drying bed at all times".</p> <p>The importance is for all sludge to be contained within the drying bed, not the geobags, as spillage of dried sludge during removal from geobags is likely.</p>	<p>The Delegated Officer considers the licence holder's response reasonable; therefore, alternate wording is deemed acceptable with retention of the wording "prior to off-site disposal or reuse to a licensed facility" to ensure the dried sludge is disposed of in accordance with these specifications.</p>
Condition 9, Table 3	<p>Remove "500 mm wide x 300 mm high embankment. Lined with 1 mm thick LLDPE (Linear Low-density polyethylene) to allow the licence holder flexibility to determine the best way to meet requirements, to provide better or equivalent liners and to keep up with material and technology changes.</p>	<p>Specifications regarding sludge drying bed embankment and liner specifications were provided by the licence holder in the application supporting documents and assessment is based on these specifications; therefore, the Delegated Officer considers embankment and liner specifications will remain with the addition of "or equivalent" to allow the licence holder some flexibility.</p> <p>The EP Act allows maintenance provisions for elements of infrastructure, however changes to different materials or specifications require a licence amendment.</p>
Condition 10, Table 4	<p>Amend "All leachate to be directed to the adjacent primary facultative pond (Pond 1A) via the leachate drain connecting them" in Row 1, Table 4 to add "pond inlet section" to clarify the importance of leachate reaching the pond inlet section to avoid short circuiting risks, as opposed to leachate being directed to the pond outlet section where it would not be treated by Pond 1A.</p>	<p>The Delegated Officer considers the licence holder's amendment request as necessary to minimise risks of emissions and approves the request.</p>
Condition 10, Table 4	<p>Remove "Dredging is not to be carried out during rainfall events" in Row 1, Table 4. The dredging method used is not weather dependent and is based on effluent being returned back to the pond undergoing desludging as soon as possible to maintain maximum pond level (allows large equipment to be used).</p>	<p>The licence holder specified in the application supporting documents that dredging would not be carried out during rainfall events; however, the Delegated Officer considers the that the dredging method is not weather dependent and will not increase the risk of emissions.</p>

Condition	Summary of licence holder's comment	Department's response
Condition 15, Table 5	<p>Infiltration Ponds can receive treated effluent from any Maturation Pond; therefore the "Source including abatement" column of Table 5 should include both Pond 2 and Pond 4 for emission points L1, L2, L3 and L4. This will allow operational flexibility when Infiltration ponds require maintenance.</p> <p>Note: Request is unrelated to amendment.</p>	<p>The Delegated Officer considers the licence holder's response and the "Source including abatement" column has been amended to allow treated wastewater to be pumped from maturation Pond 2 or 4 for emission points L1, L2, L3 and L4.</p>
<p>Schedule 1: Maps Figure 1, Page 22 Figure 2, Page 23</p>	<p>The figure on page 22 should be Figure 2 however it is referenced as Figure 1.</p>	<p>The Delegated Officer considers this is an error and has corrected the figure label on page 22 to Figure 2 and the figure label on page 23 to Figure 3. References to these figures have also been amended.</p>

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)				
Application type				
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 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:	L8039/1994/3	
		Relevant works approval number:	N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:	None	<input type="checkbox"/>
Date application received	18 November 2022			
Applicant and premises details				
Applicant name/s (full legal name/s)	Water Corporation			
Premises name	North Geraldton Wastewater Treatment Plant			
Premises location	Lot 21 on Plan 19887 GLENFIELD WA 6532			
Local Government Authority	City of Greater Geraldton			
Application documents				
HPCM file reference number:	2010/003340-1			
Key application documents (additional to application form):	<p>Signed licence application form to request for licence conditions to be amended to prescribe the activities and infrastructure relating to the sludge drying bed constructed (under the guidance of WQPN 26) without obtaining necessary approvals from DWER</p> <p>Licence amendment supporting information</p> <p>Notification under S.53 EP Act in relation to the construction of desludging containment infrastructure (sludge drying bed) without a works approval</p>			
Scope of application/assessment				
Summary of proposed activities or changes to existing operations.	Licence			

	<p>The Licence holder is requesting DWER to prescribe the following activities and infrastructure:</p> <p>Approval requested to de-sludge the existing ponds and pump the wet sludge into the geobags situated on the sludge drying bed.</p> <p>Geobags will drain leachate to the sludge drying bed back to Pond 1A.</p> <p>The sludge will be left to dry. Once dry, the sludge material (biosolids) will be tested and either sent to an appropriately classed landfill or properly licensed facility for reuse as per the “<i>Western Australian Guidelines for Direct Land Application of Biosolids and Biosolids Products</i>”.</p> <p>Construction of a PVC pipe leachate drain to direct leachate from the sludge drying bed to Pond 1A.</p> <p>The existing desludging containment infrastructure was constructed on site, in 2021 without authorisation</p> <ul style="list-style-type: none"> • 25m Width by 70m Long • Embankment (500mm wide X 300mm high. • Compacted Base • LLDPE (Linear Low-density polyethylene) 1.00mm with “L” shape anchors • Permeability of 2×10^{-10} m/s <p>The licence holder is also requesting for ongoing maintenance of the sludge drying beds. If found not compliant to specification per WQPN 26, sludge drying beds and liners can be reconstructed/ replaced before desludge events to ensure containment specifications are met.</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 (amendments only)
Category 54: Sewage facility	690 cubic metres per day	N/A

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 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 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? The premises has been defined within the City of Greater Geraldton (CGG) Local Planning Scheme No. 5, located within the Glenfield Special Control Area 2 (SCA2) zoning. In addition: Following gazettal of the Water Services Act 2012 (as gazetted on 18 November 2013), Section 137 of the Water Services Act 2012, identifies that Water Corporation (in its capacity as service provider) is exempt from the requirement to obtain development approvals for Public Service Works.
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"/>	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"/>	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"/>	Licence / permit not required.

<p>Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	<p>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</p>
<p>Is the premises situated in a Public Drinking Water Source Area (PDWSA)?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	<p>Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<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 type="checkbox"/> No <input type="checkbox"/></p>	<p><i>Environmental Protection (Controlled waste) Regulations 2004</i></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>N/A</p>