



## Application for Licence Amendment

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

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<b>Licence Number</b>	L9034/2017/1
<b>Licence Holder</b>	Water Corporation
<b>File Number</b>	DER2017/000181
<b>Premises</b>	Advanced Water Recycling Plant Ocean Reef Road, CRAIGIE WA 6025  Part of Lot 8278 on Plan 30778  As defined by the coordinates in Schedule 1 of the amended Licence.
<b>Date of Report</b>	20 April 2021
<b>Proposed Decision</b>	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

The Delegated Officer has determined to make amendments to Licence L9034/2017/1. The amendments are administrative in nature therefore they do not alter the risk profile of the Premises, providing that activities, emissions and receptors as stated in existing approvals remain unchanged.

This Amendment Report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

The decision report for the Existing licence will remain on the department's website for future reference and will act as a record of the department's decision making.

## 2. Scope of assessment

### 2.1 Regulatory framework

In amending the licence, 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

Licence L9034/2017/1 is held by Water Corporation (Licence Holder) for the Advanced Water Recycling Plant (the Premises), located at Part of Lot 8278 on Plan 30778, Ocean Reef Road, Craigie.

The Premises relates to the category and the assessed design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in existing Licence L9034/2017/1.

Water Corporation were granted Works Approval (W5571/2013/1) on 10 April 2014 to construct and operate an AWRP as part of a full-scale GWRS producing up to 14 GL/year of Recycled Water to recharge to the confined Leederville and Yarragadee aquifers, adjacent to the Beenyup WWTP, as part of Stage 1. This proposal relates to Stage 2 which includes increased production to 28 GL/year.

On 21 January 2021, the Licence Holder submitted an application to the department to amend Licence L9034/2017/1 under section 59B of the *Environmental Protection Act 1986* (EP Act). The amendment is limited only to extending the timeframes required to undertake noise monitoring and commissioning of the (Stage 2) recharge bores for reinjection of treated waste water into the Leederville and Yarragadee aquifers. The extension to these timeframes is required due to delays in commissioning the recharge bores. Recharge rates are currently lower than expected, and investigative works are required to identify and rectify the issue(s). Water Corporation have advised that commissioning should commence before 30 September 2021, and noise monitoring will be undertaken once the plant is able to reach full production.

This follows a similar approval granted through licence amendment 23 September 2020 extending the dates for recharge bore commissioning completion and noise assessment submission to 30 June 2021 and 30 September 2021, respectively. The Licence Holder states third party investigations into the lower than expected recharge rates have revealed clogging of the bore/aquifer interface, requiring remediation of each bore to achieve desired flow. The requested date extension accounts for the proposed timeframe of these works.

## 3. Consultation

The Licence Holder was provided with the draft Amendment Report on 15 March 2021. Comments received from the Licence Holder on 1 April 2021 have been considered by the

Delegated Officer as detailed in Appendix 1.

## 4. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that an amended 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 1 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 1: Summary of licence amendments**

Condition no.	Proposed amendments
3	Extension of the timeframe to undertaken noise monitoring, from 9 months post the commencement date of the amendment licence, to before 30 June 2022.
3 (c)	Extension of timeframe for acoustic assessor to provide noise monitoring report to Licence holder, from 12 months from the commencement date of the licence, to before 31 July 2022.
17	Extension of timeframe for commissioning of recharge bores from 10 months from notification to DWER that commissioning is commencing, to 24 months from notification to DWER that commissioning is commencing.

## References

1. *Department of Environment Regulation (DER) 2017, Guidance Statement: Risk Assessments, 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) 2019, Guidance Statement: Decision Making, Perth, Western Australia*

## Appendix 1: Summary of Licence Holder's comments on draft amendment

Condition	Summary of Licence Holder's comment	Department's response
3	<p>The Licence Holder comments that the required timeframes will need to be extended to align with amended commissioning timeframe as explained below.</p>	<p>The Delegated Officer considers an extended timeframe to allow the Licence Holder to complete a noise assessment for the operation of Stages 1 and 2 acceptable, due to the extended commissioning period as approved in Condition 17.</p>
17	<p>The Licence Holder states that commissioning works have experienced a delay since submitting the licence amendment and are currently 3 months behind schedule. Laboratory data (received on 31/3/2021) revealed that on top of a 6 month extension for the remediation of bores due to difficulties achieving the required flow, a contingency plan for the implementation of an alternative remediation method may be required and would take a further 6 months to complete. This entails a 14 month extension to the required date prescribed prior to this amendment.</p> <p>The Licence Holder notes the possibility that each recharge site could require the contingency plan to be implemented. This scenario would result in a commissioning timeframe of 30 months from the date of notification, rather than the 24 months approved in this amendment.</p>	<p>The Delegated Officer acknowledges the comments from the Licence Holder regarding the request for an extension to commissioning timeframes, and has considered the associated risk to authorising a 14 month extension to the commissioning period. It is noted that approvals under Part IV of the EP Act, as well as planning approvals associated with the activity don't prescribe timeframes associated with commissioning works. Given the unforeseen flow restrictions at the bore screens, the remedial works are considered necessary to achieve the outcomes of the reinjection program, and therefore the request for extended commissioning timeframes (based on slower recharge rates for the Leederville and Yarragadee aquifers) is considered acceptable.</p> <p>The Delegated Officer notes the possibility for a further 6 month extension in the comments provided, however deems that this further extension will require a separate application should this contingency be required, given the extent of the timeframe requested, and the likelihood for an updated risk assessment to be required at this later stage.</p>