



Works Approval

Environmental Protection Act 1986, Part V

Works Approval Holder: Water Corporation

Works Approval Number: W5890/2015/1

Registered office: 629 Newcastle Street
LEEDERVILLE WA 6007

Premises address: Albany Wastewater Treatment Plant
100 Timewell Road
MCKAIL WA 6330
Being Lot 1 on Diagram 44295 as depicted in Schedule 1; and

Tree Farm 1
35790 Albany Highway (Access via Gunn Road)
DROME WA 6330
Being Lot 2 on Diagram 43845, Lot 749 on Plan 100633, Lot 815 on Plan 101284, Lot 3325 on Plan 79932, Lot 4822 on Plan 157224 and Lot 10 on Diagram 84694 (excluding the Albany Septage Facility), as depicted in Schedule 1.

Issue date: Thursday, 19 November 2015

Commencement date: Monday, 23 November 2015

Expiry date: Sunday, 18 November 2018

The following category/s from the *Environmental Protection Regulations 1987* cause this Premises to be a prescribed premises for the purposes of the *Environmental Protection Act 1986*:

Category number	Category description	Category production or design capacity	Approved premises production or design capacity
54	Sewage facility: premises: a) on which sewage is treated (excluding septic tanks); or b) from which sewage is discharged onto land or into waters.	100 m3 or more per day	8 500 cubic metres per day (8.5 megalitres per day)
61	Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.	100 tonnes or more per year	3.75 megalitres (approximately 3750 tonnes) per annual period



Conditions

This Works Approval is subject to the conditions set out in the attached pages.

Date signed: 12 May 2016

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Caron Goodbourn

A/Manager Licensing - Industry Regulation (Waste Industries)

Officer delegated under section 20

of the *Environmental Protection Act 1986*



Works Approval Conditions

1 General

1.1 Interpretation

1.1.1 In the Works Approval, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 In the Works Approval, unless the contrary intention appears:

'Act' means the *Environmental Protection Act 1986*;

'annual period' means the inclusive period from 1 July until 30 June in the following year;

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means;

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au

'Commissioning' means the process of operation and testing that verifies the works and all relevant systems, plant, machinery and equipment have been installed and are performing in accordance with the design specification set out in the works approval application;

'Premises' means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Works Approval;

'Schedule 1' means Schedule 1 of this Works Approval unless otherwise stated;

'stage' means a discrete stage or component of the construction and/or installation of new infrastructure under this Works Approval which will be commissioned separately to other stages;

'Works Approval' means this Works Approval numbered W5890/2015/1 and issued under the Act; and

'Works Approval Holder' means the person or organisation named as the Works Approval Holder on page 1 of the Works Approval.

1.2 General conditions

1.2.1 The Works Approval Holder shall construct the works in accordance with the documentation detailed in Table 1.2.1:



Document	Parts	Date of Document
Albany Wastewater Treatment Plant No. 2 Upgrade (Prepared by PDC for Water Corporation)	All	5/08/2015
Application form: works approval / licence - DER application form submitted by Water Corporation for amendment to the works approval W5809/2015/1	All	8/03/2016
Design drawing HG08-21-6 rev. A – Drawing of proposed sludge dewatering infrastructure emailed by D’Niele Thorpe to Cassie Bell on 17 March 2016	All	17/03/2016
Addendum to Works Approval Amendment W5809/2015/1 – Supporting document emailed by D’Niele Thorpe to Cassie Bell on 5 April 2016	All	5/04/2016

Note 1: Where the details and commitments of the documents listed in condition 1.2.1 are inconsistent with any other condition of this works approval, the conditions of this works approval shall prevail.

1.2.2 The Works Approval Holder shall, prior to commencing commissioning of the upgrades, submit a commissioning plan to the CEO. The commissioning plan shall include details relating to:

- (a) the commissioning stages and expected timescales for commissioning;
- (b) expected emissions and discharges during commissioning and the environmental implications of the emissions;
- (c) how emissions and discharges will be managed during commissioning;
- (d) the monitoring that will be undertaken during the commissioning period;
- (e) how accidents or malfunctions will be managed;
- (f) start up and shut down procedures; and
- (g) reporting proposals including accidents, malfunctions and reporting against the commissioning plan.

1.2.3 The Works Approval Holder shall carry out commissioning in accordance with the commissioning plan.

2 Information

2.1 Reporting

2.1.1 The Works Approval Holder shall submit a partial compliance document to the CEO, following the construction of each stage of the upgrade works and prior to commissioning of that stage.

2.1.2 The partial compliance document shall:

- (a) describe the extents of the stage of works that it pertains to;
- (b) certify that the relevant stage of works was constructed in accordance with the conditions of the works approval;
- (c) be signed by a person authorised to represent the Works Approval Holder and contain the printed name and position of that person within the company.

2.1.3 The Works Approval Holder shall submit a commissioning report for the upgrade works to the CEO within 2 months of the completion of all commissioning.

2.1.4 The Works Approval Holder shall ensure the commissioning report includes;

- (a) a summary of the monitoring results recorded under condition 1.2.2;
- (b) a list of any original monitoring reports submitted to the Licensee from third parties for the commissioning period;



- (c) a summary of the environmental performance of the upgrade works as installed, against the design specification set out in the works approval application;
- (d) a review of performance against the works approval conditions; and
- (e) where they have not been met, measures proposed to meet the design specification and/or works approval conditions, together with timescales for implementing the proposed measures.

2.2 Notification

2.2.1 The Works Approval Holder shall ensure that the parameters listed in Table 2.2.1 are notified to the CEO and are in accordance with the notification requirements of the table.

Table 2.2.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement	Format or form
1.2.2	Proposed dated for commencement of commissioning of each stage of works	7 days prior to start	None specified
	Date of completion of commissioning of each stage of works	7 days after completion	

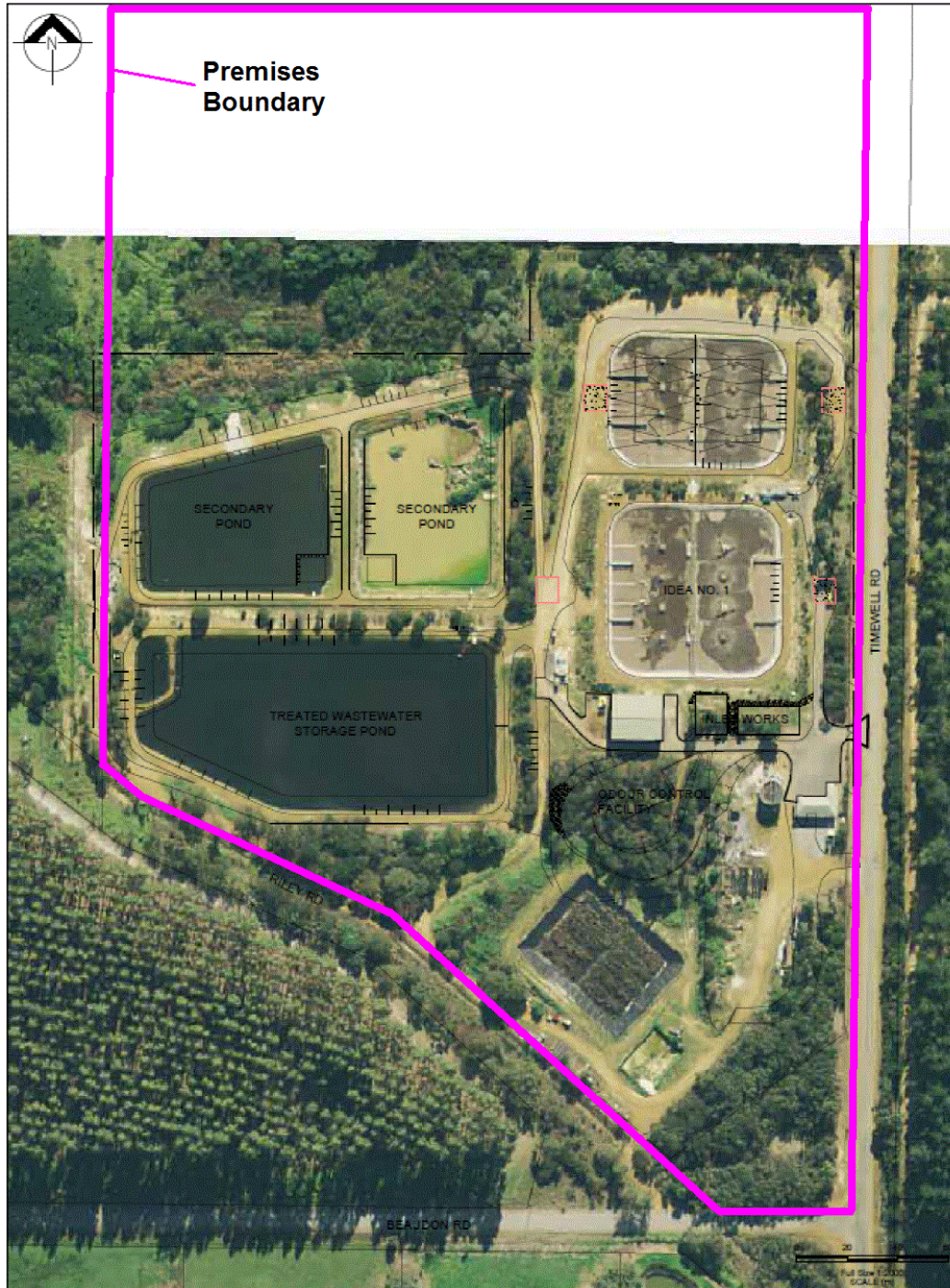



Schedule 1: Maps

Premises map

The Premises is shown in the maps below. The pink line depicts the Premises boundary.

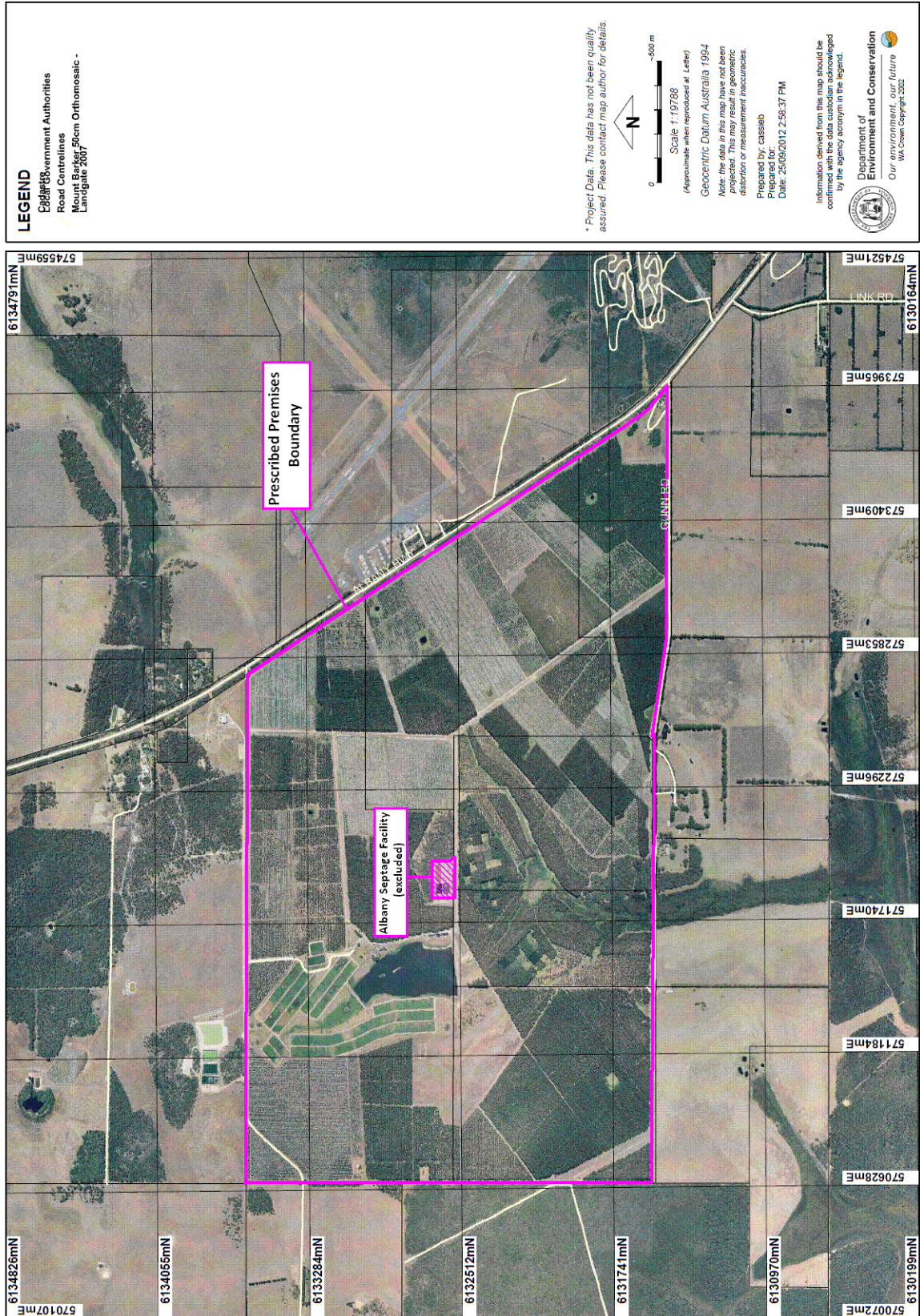
Albany Wastewater Treatment Plant (AWWTP)



CLIENT WATER CORPORATION	4630 - ALBANY WWTP	 pdc <i>Engineering Evolved</i>
DATE 19-09-14	GENERAL ARRANGEMENT	
DRAWN A. THOMPSON	REV A	
CHECKED E. WAJON		
<small>48 Kishom Rd, Appricross Western Australia 6153 +61 8 9315 5600 +61 8 9364 7860 PDCGROUP.COM</small>		
<small>Plotted By: thompson Plot Date: 25/09/14 - 13:28 Cad File: T:\4630\900 Working Documents\901 Engineering\PROJECT\4630-01-FI01.dwg</small>		



Tree Farm 1





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1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.

2 Administrative summary

Administrative details		
Application type	Works Approval <input checked="" type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	54 – Sewage facility	8 500 cubic metres/day
	61 – Liquid waste facility	3.75 megalitres (approximately 3750 tonnes) per annual period
Application verified	Date: 24/08/2015	
Application fee paid	Date: 03/09/2015	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No:



		EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

3 Executive summary of proposal and assessment

The Albany Wastewater Treatment Plant for the purposes of this licence includes two separate properties: the ‘Albany Wastewater Treatment Plant’ (AWWTP) and ‘Tree Farm 1’ (TF1); which are linked by a wastewater pipeline and collectively involved in the treatment of reticulated sewage and discharge of treated wastewater to the environment via controlled irrigation.

Albany Wastewater Treatment Plant (AWWTP)

The AWWTP located at Timewell Rd handles all of Albany’s sewage using an Intermittent Decanted Extended Aeration (IDEA) wastewater treatment system. In this facility raw sewage enters the plant through a 6mm step screen which captures large solids, which are later disposed of at a licensed landfill. The screened wastewater then enters one of two IDEA pond systems through a splitter. The IDEA ponds use powerful intermittent aerators and activated sludge to treat the wastewater by consuming nutrients. Aerators are turned off intermittently allowing the particulates to settle so that treated wastewater can be decanted from the surface. Once treated, wastewater is stored on site at the AWWTP within a storage dam, prior to being transferred off-site to the separately located Tree Farm 1 (TF1) on Gunn Rd, approximately 9km from the AWWTP.

Surrounding land use of the AWWTP is predominantly rural residential in nature, with the nearest residence approximately 500m south of the centre of the treatment plant at Lot 12 on Diagram 23899, South Coast Highway. There are no reserves, EPP areas, declared wetlands or bush plan areas on or close to the site. The site is not within a drinking water supply area. The closest surface water system located to the site is the Five Mile Creek headwater located approximately 2km to the northwest of the treatment plant.

Tree Farm 1 (TF1)

Water is pumped from the Albany WWTP via pipeline to one of two large connected storage dams at TF1, from which it is filtered and chlorinated before being irrigated through 275 ha of Australian Bluegum irrigation groups at TF1, or further transferred via the second dam to another separate premises, “Tree Farm 2” for direct irrigation of 130.3 ha of Australian Bluegums.

2015 Works approval – AWWTP upgrades

The Licensee applied for a works approval in 2015 to upgrade various components of the plant at the AWWTP to improve its capacity and performance. While the previous capacity of both IDEA lagoons at the AWWTP was considered to be 9.0ML/day, in reality this wasn’t achievable due to inefficient aerators and the lack of selectors in the aerobic anoxic lagoon (resulting in an actual capacity of approximately 5.0ML/day). Subsequently works are proposed to upgrade various components of the plant and increase the effective capacity of IDEA lagoon No. 1 to treat wastewater from 5.0 to 8.5 ML/d. It is noted that the plant will be able to physically handle 25.5ML/day for peak inflows (i.e.



emergency events); however this is not the design capacity of the treatment system and under these conditions wastewater would not be treated effectively. The upgrades applied for within the works approval application had provision for the following:

- diversion of existing pressure mains into a completely new inlet works 750 L/s (2 duty/1 standby) band screens (only two screens will be installed at this stage) incorporating screenings washing and a 750L/s vortex de-gritter, grit washer and associated equipment as well as dedicated bins for dewatered screenings and grit for off-site disposal;
- new 500kL bioselector, floating surface aerators, jetties, modification of existing concrete structures and RAS pump locations, and provision of new aerator scour control slabs within IDEA lagoon No. 1;
- a new gravity drainage deck before the existing belt filter press/or screw press;
- a new elevated overhead sludge cake hopper with conveyors and odour control;
- revised access road;
- an odour treatment facility with mixed media biofilters, fan and stack;
- upgrade of the electrical system to support the new upgrade works; and
- general site works to provide safe access to various areas of the plant.

Works approval amendment application

The works approval holder submitted an application for a works approval amendment, which was accepted by DER for assessment on 5 April 2016. The amendments application includes:

- Request for a revision of condition 2.1.1 of the works approval for the submission of a compliance document prior to commissioning of the works. As the works involves multiple components of infrastructure to be installed and brought online at different times, the condition does not allow for realistic commissioning to occur. It is suggested that the condition be amended to fit with the actual construction/commissioning process.
- Works will now cut out the sludge storage tank from the process stream.
- The dewatering of sludge will no longer be undertaken on the existing belt filter press (BFP), instead this will occur in a two stage process consisting of a rotary disc thickener followed by a rotary screw press. The existing BFP will remain in position as a backup should the other systems be out of service for any reason.
- The increase of the odour control stack height from 3m to 10m to prevent downdraft on the administration or sludge handling areas.
- Revised proposed construction and commissioning timeframes (indicative only).

The proposed changes to sludge management infrastructure arose due to the applicant becoming aware of alternative dewatering equipment which achieves better solid concentration than the previously proposed equipment. These, and the rest of the proposed changes are considered to be advantageous from the technical, environmental and economic perspectives.

An environmental assessment of the amendment application only (and resulting recommendations for conditions in the works approval) are detailed in the Decision Table below. The environmental assessment of the full scope of the remaining (unchanged) upgrades is detailed in the Decision Document which accompanied the works approval issued 20 November 2015.

The operation of the facility will not change significantly as a result of the works, or the latest amendment, and therefore there are no changes recommended for the operating licence conditions post-commissioning. The premises map on the licence may require update; however this can be done at the next amendment as retaining the old map should not result in any non-compliance.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Interpretation	W1.1.1 – W1.1.2	<p>Construction</p> <p>A definition for 'stage' has been added to condition 1.1.2, as this term has been added into conditions 2.1.1 and 2.1.2 furtherin (see Reporting section below) as part of this amendment.</p> <p>Conditions 1.1.3 and 1.1.4 from the previous version of the works approval have been deleted, as they refer to how to interpret any references to standards, guidelines and codes of practice. There are no standards, guidelines or codes of practice referred to in the works approval, as such the conditions are not required.</p>	
General conditions	W1.2.1	<p>Construction</p> <p>Condition W1.2.1 which specifies the construction in accordance with the works approval application and commitments within it has been amended to include the documentation that has been submitted in support of the amendment application.</p> <p>No other changes have been made to the general conditions of the works approval. See Emissions to land and Odour sections below for more detail on the environmental risk assessments of what is proposed in the works approval amendment application.</p>	
Emissions to land including monitoring	Specific conditions not required (see W1.2.1 above)	<p>Operation</p> <p><u>Emission Description</u></p> <p><i>Emission:</i> Spillages of sludges or leachates from sludges from the proposed new rotary disc sludge thickener, holding tank or rotary screw press (as replacement for the existing sludge storage tank and belt filter press).</p> <p><i>Impact:</i> Increased contamination of soil and shallow groundwater in the plant area with nutrients, pathogens and other contaminants (e.g. heavy metals) present in</p>	<p>Addendum to Works Approval Amendment W5809/2015/1;</p> <p><i>Environmental Protection</i></p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>wastewater. Death or loss of condition of vegetation in the immediate area due to overloading of soils with contaminants.</p> <p><i>Controls:</i> The new thickener, holding tank and screw press are completely enclosed. As a result of the elimination of the belt filter press, dewatered sludge will no longer be dropped on the floor of the sludge storage shed and instead conveyed by the enclosed conveyor to the proposed sludge hopper. The existing belt filter press will be retained as a back up option, should the new thickening/dewatering system be out of service for an extended period; however even if this occurs, dewatered sludge still will not be dropped to the floor and instead will be directly transferred via the new enclosed conveyor to the new sludge hopper.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> No changes to the licence are proposed as a result of the amendment to the works approval. All new infrastructure is lined/hardstand/enclosed and spillages of any material should not occur. The overall risk of discharges is potentially reduced as a result of the works approval amendment, compared with the original works approval upgrades. Condition W1.2.1 on the works approval to construct in accordance with the application (now including the amendment application documentation) and the unauthorised discharges regulations are sufficient to regulate the risk.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	<i>(Unauthorised Discharges) Regulation 2004</i>
Fugitive emissions	N/a	Construction	Application supporting



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Emission Description</u> <i>Emission:</i> Fugitive emissions of dust from the earthworks required to prepare for new rotary disc sludge thickener, holding tank or rotary screw press. <i>Impact:</i> Potential smothering of existing vegetation around the site, potential nuisance impacts on closest neighbours (400m) in an extreme dust situation. <i>Controls:</i> Construction dust would be managed in the same way as it will be for the rest of the proposed works, including wetting down disturbed areas of soil during dry spells either by sprinkler or water cart.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> No specific conditions were proposed for the works approval for the management of fugitive dust. It is not considered that the amendment application should alter this situation. It is considered that the condition to construct in accordance with application documentation and the general provisions of the <i>Environmental Protection Act 1986</i> should be sufficient to regulate the risk.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	<p>documentation (section 6.5)</p> <p><i>Environmental Protection Act 1986</i></p>
Odour	Specific conditions not required (see W1.2.1 above)	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Fugitive emissions of odour from the wastewater treatment process from the newly proposed rotary disc sludge thickener, holding tank or rotary screw press. <i>Impact:</i> Potential amenity impacts to nearby residents (minimum 400m away).</p>	<p>Application supporting documentation (section 6.1);</p> <p>Addendum to</p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Controls:</i> The rotary disc sludge thickener, holding tank and rotary screw press will all be completely enclosed and subject to odour control via the odour control facility that is already proposed under this works approval. This, together with the proposal to eliminate the existing sludge storage tank (a potentially significant source of odour) and existing belt filter press, the ceasing of dewatered sludges being dropped on the floor of the sludge shed, and the increase of the height of the odour control unit stack from 3m to 10m should result in significantly decreased risk of odour emissions than the original works approval.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> As stated in the original decision document, conditions may be considered on the licence for the annual monitoring of odour as suggested in the works approval application, pending the results of the initial odour monitoring undertaken as part of commissioning. It is otherwise considered that the works approval condition W1.2.1 to construct in accordance with application documentation (now including the amendment application documents), and existing conditions W1.2.2 to prepare a commissioning plan (including monitoring) and W1.2.3 to comply with the commissioning plan are sufficient to regulate the odour risk. The general provisions of the <i>Environmental Protection Act 1986</i> also apply.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	<p>Works Approval Amendment W5809/2015/1;</p> <p><i>Environmental Protection Act 1986</i></p>
Noise	N/a	Construction	Application



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Emission Description</u> <i>Emission:</i> Noise emissions from construction of new components referred to in amendment application, being the rotary disc sludge thickener, holding tank or rotary screw press. <i>Impact:</i> Potential amenity impacts to nearby neighbours (400m). <i>Controls:</i> Construction is programmed for daylight hours only.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> No specific conditions are proposed for the works approval for the management of noise. It is considered that the condition to construct in accordance with application documentation, and <i>Environmental Protection (Noise) Regulations 1997</i> should be sufficient to regulate this risk.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	<p>supporting documentation (section 6.5)</p> <p><i>Environmental Protection (Noise) Regulations 1997</i></p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Reporting	W2.1.1 – 2.1.3	<p>Construction</p> <p>Conditions W2.1.1 - W2.1.3 have been amended on the works approval as a result of the amendment application submitted which clarified that the works involve multiple components of infrastructure to be installed and brought online at different times (which may result in commissioning of some components occurring at the same time as construction of other components).</p> <p>Condition 2.1.1 has been amended such that it now requires a partial compliance document to be submitted after each 'stage' of installation and <i>prior to</i> commissioning of that stage. It is noted that Water Corporation requested in their Addendum that a compliance document be allowed to be submitted <i>during</i> commissioning; however this would effectively defeat the purpose of the condition which is for Water Corporation to provide a legal certification of what they have installed prior to commissioning it. As mentioned under Interpretation, a definition for 'stage' has been added under condition 1.1.2. It is acknowledged that exact 'stages' are not clear to Water Corporation at this stage; however will be further defined in the Commissioning Plan required to be submitted under condition 1.2.2.</p> <p>Condition 2.1.2 has also been amended to clarify the compliance document as being 'partial', and to include an additional requirement for it to contain the details of <i>which stage</i> of works it relates to, for clarity when it is received by DER.</p> <p>Condition 2.1.3 has been amended slightly to clarify that it relates to the completion of 'all' commissioning (i.e. a commissioning report is not required for each individual stage).</p>	Application supporting documentation
Notification	W2.2.1	<p>Construction</p> <p>Condition W2.2.1 has been amended to clarify that notifications are required for proposed dates for commencement of commissioning <i>of each stage of works</i>, and completion dates of commissioning <i>each stage of works</i>.</p>	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
15/04/2016	Proponent sent a copy of draft instrument	Water Corporation responded on 5/05/2016 advising they were happy with the proposed amendments.	No changes.



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High