



Application for Licence Amendment

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

Licence Number	L8773/2013/1
Licence Holder	City of Karratha
File Number	APP-0032922
Premises	Karratha Airport Wastewater Treatment Plant Bayly Avenue Legal description – Part of Lot 302 on Deposited Plan 41933 Lot 300 on Deposited Plan 41931 As defined by the Premises maps attached to the Revised Licence
Date of Report	27 February 2026
Decision	Revised licence granted

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1. Decision summary

Licence L8773/2013/1 (L8773) is held by City of Karratha (Licence Holder) for the Karratha Airport Wastewater Treatment Plant (the Premises), located at Lot 302 Bayly Avenue, Gap Ridge WA 6714.

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 L8773 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 Background

On 11 December 2025, the Licence Holder submitted an application to the department to amend Licence L8773 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The Karratha Airport Wastewater Treatment Plant (WWTP) caters for treatment of wastewater sourced from the Karratha Airport and associated facilities within the airport precinct, and reuses treated wastewater for various purposes. The Licence Holder has recently upgraded its WWTP by installing a new permanent WWTP which comprises two 50kL/day Sequential Batch Reactors (SBR) and one 100kL/day Ultrafiltration (UF) Plant, above ground. The final treated effluent (maximum of 100 m³/day) will continue to be released to the designated discharge points as per the Existing Licence. The intent of the upgrade is to enhance treatment performance and improve effluent quality for better environmental outcomes.

The Licence Holder initially submitted a works approval application for upgrading the WWTP on 2 July 2025, and the construction works were scheduled for mid-August 2025. However, following discussions with DWER in August 2025, the Licence Holder confirmed that WWTP construction works were about to occur without a valid works approval. Accordingly, DWER advised that upgrades to the WWTP, without a works approval, constitutes a breach of section 53 of the *Environmental Protection Act 1986*. DWER confirmed that a works approval could not be issued before the proposed construction works due to assessment timeframes and the works approval could not be issued retrospectively.

Therefore, DWER recommended withdrawing the works approval application and resubmitting the approval as a Licence amendment application after commissioning of the new upgraded WWTP supported by a comprehensive commissioning report.

DWER requested the following information as part of the licence amendment package submission:

- As constructed plans and sign off by an engineer that the WWTP has been constructed in accordance with the WWTP's design specifications, and located in a manner that will prevent emissions and discharges to the environment should failure occur (i.e. alarm

systems in place, located within bunded area / on hardstand etc.);

- An overview of any infrastructure that is now redundant as a result of the construction of the new WWTP;
- A report on Environmental Commissioning outlining the following:
 - A summary of proposed and ongoing environmental commissioning activities undertaken, including timeframes and the amount of sewage treated through the WWTP;
 - Any monitoring results recorded during commissioning;
 - A summary of the environmental performance of the WWTP;
 - A review of the WWTP's performance and compliance with current Existing Licence conditions (including any emissions limits listed within the Licence);
 - Where they have not been met, measures proposed to meet the WWTP's design specifications and the conditions on the Licence, together with timeframes for implementing the proposed measures; and
 - A revised map outlining the location of the additional infrastructure.

Following the conclusion of the construction works, the Licence Holder subsequently sought approval to transfer effluent for commissioning purposes; however, DWER advised that formal approval could not be granted. Commissioning may proceed at the Licence Holder's discretion, with all associated liabilities assumed by the Licence Holder, and detailed records of commissioning activities must be provided in the licence amendment application.

2.3 Environmental Commissioning Report

The Licence Holder has now completed Commissioning of the upgraded WWTP and accordingly has submitted a licence amendment with the requested Environmental Commissioning Report (ECR) as Appendix C, D and E of the Application Supporting Documents.

Commissioning of the WWTP commenced on 18 August 2025. The Licence Holder confirmed that there were no design variations or issues during the construction process. Commissioning also included a comprehensive sampling and testing regime. A summary of the test results is provided in Table 1 below. The target TWW values are shown at the bottom of the table which indicates that all treated effluent samples meet all required parameter targets. The test results indicate that the performance of the new WWTP is in line with the Existing Licence requirements and meets the objectives for Class A recycled water as detailed in guidelines from the Department of Health (DoH).

The commissioning certificates confirms that the WWTP is fit-for-purpose and constructed as per the detailed design drawings.

Key Finding: The Delegated officer has reviewed the ECR and considers the following:

1. It is noted that the Licence holder has submitted a Recycled Water Quality Management Plan (RWQMP) for the Karratha Airport Recycling Scheme.
2. Results obtained during the commissioning period demonstrate that TWW parameters are below WWTP design parameters.
3. The existing licence sets only TN and TP loading rate limits, not individual TWW parameter limits. Recent AACRs show these loading limits were exceeded, so continued monitoring is required. However, further breaches are unlikely given the improved treatment capacity following the WWTP upgrade.

Table 1: WWTP parameter sample summary

Date	Stream	BOD (mg/L)	Total Suspended Solids (TSS) (mg/L)	Turbidity (NTU)	pH (pH units)	Free Chlorine (mg/L)	E.coli (cfu/100mL)	Thermotolerant Coliforms (cfu/100mL)	Somatic Coliphages (pfu/100mL)	Clostridium perfringens spores (cfu/100mL)
01/09/25	SBR B: Treated Effluent		<5.0	0.71	8.0	0.30	<10	<10	<1	<1
01/09/25	SBR B: Water		97	21	6.9	0.19	390,000	990,000	>2,400	>100
08/09/25	SBR B: Raw Effluent	160	890	520	7.6	0.13	35,000	59,000	>2,400	>10,000
08/09/25	SBR B: Treated Effluent	<5.0	<5.0	0.78	8.2	0.61	<1	<1	<1	<1
15/09/25	SBR A: Raw Effluent	99	61	46	7.7	0.11	440,000	840,000	>2,400	>10,000
15/09/25	SBR B: Treated Effluent	<5.0	<5.0	0.91	7.9	0.20	<1	<1	<1	<1
22/09/25	SBR A: Raw Effluent	73	42	21	7.6	NT	>80,000	>80,000	>2,400	>10,000
22/09/25	SBR B: Treated Effluent	5.4	<5.0	0.88	7.7	0.49	<1	<1	<1	<1
30/09/25	1 – Treated Water	8.4	<5.0	1.0	7.7	1.9	<1	<1	<1	<1
30/09/25	2 – Raw Water	70	52	9.2	8.0	<0.10	>800,000	>800,000	>2,400	>9,000
06/10/25	Raw Effluent	29	44	15	7.6	<0.10	1,400,000	3,500,000	>2,400	>10,000
06/10/25	Treated Effluent	<5.0	<5.0	0.89	8.0	0.45	<1	<1	<1	<1
	Target	<10	<10	<2 (95%ile); <5 (max)	6.5-8.5	0.2-2.0	<1	<1	<1	<1

2.4 Application summary

This amendment is limited only to changes to Category 54 infrastructure – there is no change to the Existing Licence Production and Design Capacity (P&DC).

The following amendments are being sought to upgrade the Wastewater Treatment Plant (WWTP):

Existing elements:

- Four balancing tanks;
- One sludge tank; and
- Four treated effluent tanks.

New elements:

- Two SBR tanks (50kL/day capacity each);
- One UF plant (100kL/day capacity) consisting of one 50kL buffer tank and one 20' UFcontainer; and
- An extension to the existing hardstand within the existing cyclone fencing to accommodate the new infrastructure.

Decommissioned elements:

- Two MBR units and all associated pipework.

The updated WWTP layout is included in Figure 1 below.

The upgraded WWTP required an extension of the current hardstand of approximately 250m². This extension consisted of compacted subgrade and concrete slab 100mm above ground.

Wastewater enters the WWTP through an inlet screen, which removes inorganic materials before temporary storage in a balance tank to regulate flow. The wastewater is then pumped into the SBR tank, where microorganisms break down organic pollutants. The treatment process includes an anoxic phase for de-nitrification and an aerobic phase for biological oxidation of organic matter (BOD removal). After solids settle at the bottom of the tank, clear effluent is decanted and transferred to the balancing tanks for secondary treatment. Excess sludge is pumped to a sludge storage tank for offsite removal to an appropriately licenced facility.

As per Existing Licence conditions, TWW will be used for various purposes such as irrigation of landscaped areas, firefighting and training, aviation wash down, hire car wash down, and removal from site for dust suppression at the City of Karratha Seven Mile Landfill site.

Any excess water will be diverted to the designated leachate/effluent pond to be evaporated. The pond has a capacity of up to 220m³ and was constructed to accommodate emergency surplus overflow from the TWW storage tanks. The pond is only used when all other reuse options have been exhausted. The pond is located within the fenced area of the existing WWTP to prevent unauthorised access to the area.

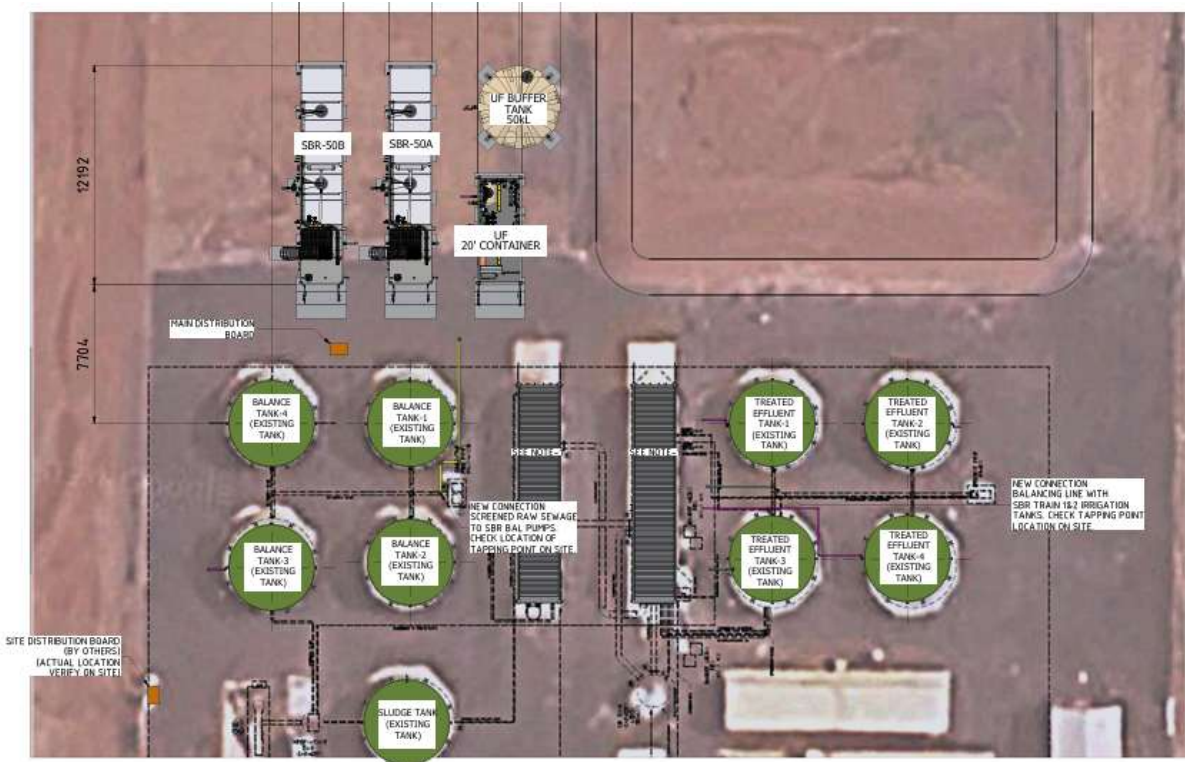


Figure 1: WWTP layout

2.5 Consolidation of Licence

As part of this amendment package the department has consolidated the licence by incorporating changes made under the Amendment Notices as summarised in Table 3.

Table 3: Licences consolidated in this amendment

Instrument	Issued	Summary of approval
L8773	26/04/2016	Notice of Amendment of Licence Expiry Dates – expiry 15 December 2030.
L8773	16/05/2022	Notice of Amendment of Licence Reporting Requirements. Annual Environmental Report change to biennially after 1/03/2024.

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 advise the Licensee 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 4 below. Table 4 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 4: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Operation of the WWTP	Air/windborne pathway	Water cart as required. Small premises size so limited area for dust. Premises is mostly a hardstand area. Vehicle speed limit is 20 km/hr.
Noise		Air/windborne pathway	Compliance with <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regs). Machines are maintained in good working order. Machines are fitted with appropriate acoustic mufflers. Vehicles restricted to 20 km/hr.
Odour		Air/windborne pathway	Treatment tanks are fully enclosed. Desludging operations will be limited to a brief period on a regular scheduled basis and will not be undertaken during periods of high wind or when prevailing winds are from the north or northeast direction. WWTP will undergo regular monitoring and maintenance to ensure optimal operation. Complaints register maintained. Odour levels will be monitored by staff.

Emission	Sources	Potential pathways	Proposed controls
TWW Discharges to Land		Seepage to soil and groundwater	Monitoring of TWW – existing licence conditions. Existing Licence limits for discharge of TN and TP. RWQMP. Sludge removed off-site to a licensed landfill premises.
Spills / Leaks		Overland runoff to surface water and seepage to groundwater	Hardstand constructed to meet not less than 1 x 10 ⁻⁸ m/s permeability with bunds. WWTP is surrounded by containment bunding. Stormwater is diverted away from the infrastructure. All stormwater infrastructure is regularly inspected and maintained.
Contaminated Stormwater		Overland run-off and seepage to soils and groundwater	WWTP is surrounded by containment bunding. Stormwater is diverted away from the infrastructure. All stormwater infrastructure is regularly inspected and maintained.

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 5 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 5: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises	4 km southeast
Environmental receptors	Distance from prescribed activity
Tidal creek	500 m northwest of Premises
Groundwater	2mbgl
Indian Ocean	7 km west
Threatened flora	1 km within premises

Threatened fauna	2 km within premises
Aboriginal heritage site	500 m from WWTP

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 6.

The Revised Licence L8773 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 6. Risk assessment of potential emissions and discharges from the Premises during operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation of WWTP Vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residences 4 km southeast	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	The Delegated Officer has considered the separation distance between the source and receptors and considers that dust emission impacts are not foreseeable. Dust can be adequately regulated by section 49 of the EP Act.
	Noise	Air/windborne pathway causing impacts to health and amenity	Residences 4 km southeast	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	The Delegated Officer has considered the separation distance between the source and receptors and considers that impacts from noise emissions are not foreseeable. Noise emissions are adequately regulated under the Noise Regs.
	Odour	Air/windborne pathway causing impacts to health and amenity	Residences 4 km southeast	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	The Delegated Officer has considered the separation distance between the source and receptors and considers that odour emission impacts are not foreseeable. Odour can be adequately regulated by section 49 of the EP Act.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	TWW Discharges to Land	Discharge to land and subsurface seepage causing contamination of soil, degradation of groundwater quality and impacts to downgradient receptors	Groundwater 2 mbgl	Refer to Section 3.1	C= Moderate L= Unlikely Medium Risk	Y	Condition 3, 4, 5, 6, 8, 9, 10-13, 14, 15, 16, 19 and 20	N/A
	Spills / Leaks	Direct discharge to land and groundwater	Groundwater 2 mbgl	Refer to Section 3.1	C= Moderate L= Unlikely Medium Risk	Y	Condition 3 and 7	N/A
	Contaminated stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water and seepage to soils and groundwater impacting groundwater quality	Tidal creek 500 m northwest	Refer to Section 3.1	C= Slight L= Unlikely Low Risk	Y	Condition 1, 4, 5 and 6	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 7 provides a summary of the consultation undertaken by the department.

Table 7: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 6 January 2026	Comments due 27/01/2026 One submission received 9 January 2026 – refer to Appendix 1	Noted. Refer to Appendix 1
Department of Health (DoH) advised of proposal 6 January 2026	DoH replied on 20/1/2026 requesting an extension to 27/1/2025. DWER granted the extension. DoH replied on 17 February 2026 advising they have reviewed the documentation and have no objection to the onsite wastewater treatment plant and its associated recycled water scheme approval – F-AA-22120 Karratha Airport Scheme v2 2025.	Noted.
Licence Holder was provided with draft amendment on 5 February 2026.	Licence Holder responded on 26 February 2026 confirming: <ul style="list-style-type: none"> <i>L6 car wash down facility refers to the Avis Rent a Car wash pad that receives treated water used to wash the fleet of cars. This water is then processed through a grease and oil trap then diverted to the Airport pump station 5 which then returns the water back to the WWTP for processing.</i> <i>Table 6 L1_15 see attached drawing, the treated water holding tanks are original tanks from the old plant as are the raw tanks.</i> 	Noted Changes made to Licence and Amendment Report.

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 8 provides 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 8: Summary of licence amendments

Condition no.	Proposed amendments
-	Notice of Amendment of Licence Expiry Dates – expiry 15 December 2030 as per Table 3 of the Amendment Report
20	Notice of Amendment of Licence Reporting Requirements. Annual Environmental Report changes to biennially after 1/03/2024 as per Table 3 of the Amendment Report.
3 Table 3	Addition of Infrastructure and equipment condition and table 3 which identifies respective WWTP infrastructure including the new WWTP.
8 Table 4	Additon of L1 emission locations.
14 Table 6	Addition of monitoring point reference in table and map.
Schedule 1 Map	New Premises Map, Emissions to Land Map L1, L2. L3-L6, Premises Layout Map and monitoring map.

Table 9 provides a conversion map of the Existing Licence conditions reformatted into the current licence template.

Table 9: Consolidation of licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Expiry Date: 05 October 2019	Expiry Date: 05 October 2025	In accordance with the Notice of Amendment of Licence Expiry Dates (29/04/2016)
N/A	Prescribed Premises Category table	N/A	Revised to current licensing format.
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	Redundant condition. Revised to current licensing format.
1.1.4	Reference to code of practice	N/A	Redundant condition. Revised to current licensing format.
1.1.5	Emission authorisation	N/A	Redundant condition. Revised to current licensing format.
1.2.1	Operate and maintain all pollution and monitoring equipment to manufacturers specification.	Condition 12 and 13	Revised to current licensing format.

Existing condition	Condition summary	Revised licence condition	Conversion notes
1.2.2	Hazardous materials recovery	Condition 7	Revised to current licensing format.
1.2.3	Stormwater management	Condition 4	Revised to current licensing format.
1.3.1 Table 1.3.1	Waste acceptance	Condition 1 Table 1	Revised to current licensing format.
1.3.2 Table 1.3.2	Waste processing	Condition 2 Table 2	Revised to current licensing format.
-	Infrastructure and equipment	Condition 3 Table	Revised to current licensing format.
1.3.3	Management of irrigation of treated wastewater	Condition 5	Revised to current licensing format.
1.3.4	Management of treated wastewater infiltration pond	Condition 6	Revised to current licensing format.
1.3.5	Management of treated wastewater vessels	Condition 4	Revised to current licensing format.
2.1.1	Record and investigate exceedances of limits or targets	N/A	Redundant condition. Deleted from licence.
2.2.1 Table 2.2.1	Emissions to Land	Condition 8 Table 4	Revised to current licensing format.
2.2.2 Table 2.2.2	Emission to land limits	Condition 9 Table 5	Revised to current licensing format
3.1.1	General Monitoring	Condition 10	Revised to current licensing format
3.1.2	Monitoring frequency	Condition 11	Revised to current licensing format
3.1.3	Monitoring equipment calibration	Condition 12	Revised to current licensing format
3.1.4	Monitoring equipment calibration	Condition 13	Revised to current licensing format
3.2.1 Table 3.2.1	Monitoring of emissions to land	Condition 14 Table 6	Revised to current licensing format
3.3.1 Table 3.3.1	Monitoring of input and outputs	Condition 15	Revised to current licensing format
4.1.1	Records	Condition 17	Revised to current licensing format
4.1.2	Licence availability	N/A	Redundant attachment. Deleted from Licence

Existing condition	Condition summary	Revised licence condition	Conversion notes
-	Maintain Records	Condition 18	Revised to current licensing format
4.1.3	Annual Audit Compliance Report	Condition 19	Revised to current licensing format
4.1.4	Complaints management	Condition 16	Revised to current licensing format
4.2.1 Table 4.2.1	Annual Environmental Report	Condition 20 Table 8	Revised to current licensing format
4.2.2	Annual Environmental Report requirements	Condition 20 Table 8	Revised to current licensing format
4.3.1 Table 4.3.1	Notifications	N/A	-
Schedule 1: Maps	Premises map	Schedule 1: Maps	New map
Schedule 2 Reporting & notifications	Annual Audit Compliance Report Form N1 Notification	N/A	Redundant attachment. Deleted from Licence Forms accessed at www.dwer.wa.gov.au

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 Public Submissions on Application

Condition	Summary of Public comment	Department's response
-	<p>Works Approval Requirements.</p> <p>Works-approval breach: Confirmation from DWER on whether the construction undertaken without a works approval will be treated as a statutory breach and, if so, what enforcement or remedial conditions will be imposed.</p>	DWER Regulatory Services referred the breach of s53 of the EP Act to DWER Assurance for a review and assessment in parallel to the Departments Compliance and Enforcement Policy.
-	<p>Licence Amendment Documentation.</p> <p>Licence-amendment matrix: Provision of a complete clause-by-clause comparison between the existing licence text and the proposed amendments, together with quantitative justifications for each change.</p>	<p>Table A-6-1 is the Licence Holders proposed amendment wording / format only.</p> <p>DWER as the Regulator will determine the correct format for a licence amendment. DWER's Amendment Report will outline changes made to the previous licence.</p>
-	<p>Public Consultation</p> <p>Community engagement: Submission of the stakeholder-engagement log, minutes of any public meetings, and a summary of odour-related complaints received to date.</p>	<p>It is the responsibility of the Licence Holder to consult with relevant Stakeholders.</p> <p>DWER conducts its own Stakeholder consultation as required under s54 of the EP Act – this is provided in Section 4 Table 7 of the Amendment Report.</p> <p>Existing licence conditions require the Licence Holder to implement a complaints management system. Conversely, the Licence Holder is required to submit an Annual Environmental Report to DWER CEO which includes a Complaints summary.</p>
-	<p>Environmental Risk Assessment.</p> <ul style="list-style-type: none"> • Odour monitoring: Baseline odour data (including H₂S and VOC concentrations) and a six-month monitoring plan with a schedule for public reporting. • Noise modelling: A predictive noise model (e.g., NMPB-R2) and verification measurements at the airport terminal, the nearest sensitive receptors, and the salt ponds, with a commitment to implement additional attenuation if levels exceed 55 dB(A) L_{eq}. • Dust control: Installation of PM_{2.5}/PM₁₀ monitors, regular reporting of particulate data, and a wind-rose analysis that defines the "strong wind" threshold used to suspend works. • Storm-water hydraulics: Hydraulic modelling (e.g., HEC-RAS) for the 250 m² hardstand expansion, plus a documented leak- 	<ul style="list-style-type: none"> • An Odour emission risk assessment is provided in Table 6 of the Amendment Report. The risk is Low and accordingly can be managed under s49 of the EP Act. • A Noise emission risk assessment is provided in Table 6 of the Amendment Report. The risk is Low and accordingly can be managed under the Noise Regs. • A Dust emission risk assessment is provided in Table 6 of the Amendment Report. The risk is Low and accordingly can be managed under s49 of the EP Act. Section 9 of the Dust emissions Guideline allows for screening out of dust which in this process considers separation distance to receptors and environmental siting and other factors. This is discussed in Table 6 of the Amendment Report. • A Contaminated Stormwater emission risk assessment is provided in Table 6 of

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Condition	Summary of Public comment	Department's response
	<p>detection protocol for the UF membranes, including weekly pressure checks and a spill-containment plan.</p> <ul style="list-style-type: none"> • Fire-hazard analysis: NFPA 704 classification for all plant equipment and a certified fire-suppression system design that specifies water-storage volume and pump capacity. • Traffic impact: A traffic-simulation report quantifying vehicle counts, peak-hour flows, and any required upgrades to the existing access road, such as widening or pavement reinforcement. • Security audit: An AS 2201-based security risk assessment that identifies critical assets, threat vectors, and recommended controls such as CCTV and intrusion detection systems. 	<p>the Amendment Report. Licence conditions are on the licence to mitigate stormwater emissions.</p> <ul style="list-style-type: none"> • Fire/smoke is not an emission risk assessed for WWTP. In this instance general sections of the EP Act apply. • Traffic is not an applicable emission from a WWTP, therefore no traffic management is required. Traffic management at the Airport is the responsibility of the Airport Corporation. • Security is not an identified emission from Table 4 and 6 from a WWTP.
-	<p>Environmental Commissioning</p> <p>Commissioning data: Full raw data sets from the commissioning phase, accompanied by statistical analysis, QA/QC documentation, and laboratory accreditation details.</p>	<p>Commissioning data was provided in the amendment application.</p>
-	<p>Ongoing monitoring</p> <p>UF membrane performance monitoring: A routine schedule for monitoring trans-membrane pressure, flux, and fouling indicators, together with a fouling-control strategy.</p>	<p>The Licence Holder is required to submit an AER which includes monitoring data. This data advises whether the WWTP is operating correctly. Any abnormalities in the data indicate if infrastructure improvements are required which can include additional maintenance etc.</p>
-	<p>Data Accessibility</p> <p>Data publication: Commitment to upload all monitoring data to the WA Environment Data Portal within 30 days of collection, ensuring transparency and public accessibility.</p>	<p>The Licence Holder is required to submit an AER. The AER contains monitoring data and is available under Freedom of Information.</p>
-	<p>Adaptive Management (Adaptive Management Guidelines, DWER, 2022)</p> <p>Adaptive management plan: Inclusion of a trigger-based adaptive-management framework that outlines specific environmental thresholds, responsible parties, and corrective actions.</p>	<p>DWER has not published a document referred to by this name.</p>