

Catherine Hill Bay

Network Licence number 16_035

Water Industry Infrastructure

OBJECTION TO CHANGE OF OPERATORS LICENCE

REFERENCE DOCUMENTS

Original IPART Licence Application Form - October 2014

Original IPART Licence Application Appendix B Process Flow Diagrams for stage 1, stage 2 and stage 3

IPART Licence No 16_035 signed March 2016

Network Operator Licence Variation Application Form 2017

Solo Water drawing 211688(13)-ESK-009 and 010

COMMENT

INITIAL APPLICATION

The initial application for the provision of a sewage collection and treatment system for the new development at Catherine Hill Bay was submitted and showed 3 stages for the development of the service, Stage 1 up to 112ET, Stage 2 up to 470ET, and stage 3 up to 540 ET.

The initial application states "All wastewater produced in the scheme is managed onsite within the footprint of the approved residential subdivision by a combination of non-potable reuse at individual lots and via controlled irrigation of public open space" refer paragraph 4.2.6, 4.3.6

This is contradicted by 4.3.9 which states "All membrane cleaning wastewater in temporarily stored in CIP waste tank.... If process impacts are observed... this stream will be trucked off site to the nearest accepting facility using Solo Waste liquid waste vehicle"

The above is confirmed in the Process flow diagrams H10052_P04E, P03E and P11A where the only stream that is discharged from the site is the RO reject which is to be subject to "offsite Disposal of salt residue/surplus brine to approved facility using licenced waste contractor"

GRANTED LICENCE 16_035

The licence granted by IPART has the requirement for the Licensee to provide "strategy of tankering out excess non potable water as set out in its REF, refer A8 (a)

The licensee was required to provide “details of Appropriate Facilities that have the capacity to accept excess sewage” refer A9 a)

The licensee was required to provide “evidence of agreements with Appropriate Facilities setting out the arrangements for accepting excess sewage” refer A9 b)

APPLICATION TO REVISE THE LICENCE

Para 3.5.1 makes the assertion “the proposed surplus recycled water release system will not result in significant impacts.....” **This is untrue as the a waste stream was to be treated in an Appropriate Facility and the revised proposal is to change this to being discharged to the environment.**

Para 3.7.1 makes the assertion “The protection of public health, the environment, public safety... is achieved by

-Minimising wet weather overflows of raw sewage to local waterways....

-Minimising discharge of sewage effluent to waterways...”

The original application showed no discharge of any liquid of any kind to the environment outside the development. The License was granted on this basis. The application to revise the license minimises a flow that was neither granted not allowed.

Para 3.7.1 at the bottom of page 15, and top of page 16, asserts that “avoiding transferring water to a centralised system that is typically stressed during wet weather.....” inferring this would be a benefit. **This is ignoring the obligation stated in Licence 16_035 paragraph A8 and A9 noted above.**

Para 3.7.1 last sentence seeks to add more load to the system while avoiding the licence obligation to appropriately dispose of excess liquid

Para 4.2.3 States “No change to the area of operations is required for the licence variation” **This is untrue as the drawings show a discharge to the environment outside the development area in a different catchment area to the process plant.**

Para 4.2.4 States “All interconnections are as per existing licence 16_035” **This is untrue as the existing licence is based on drawings showing no discharge to the environment, refer Process flow diagrams H10052_P04E, P03E and P11A, and the drawings attached to the revised applications show a discharge via a waterway and wetland. refer drawings 211688(13)-ESK-010 and 009**

Para 4.3.13 The licence Application Form requests a “land capability assessments..... on proposed land disposal area” **The appicate has chosen to ignore the question with an answer of N/A where it is clear the application intends to dispose of waste water outside the development site contrary to the granted licence 16_035.**

Drawing 56-RW-PFD ST3-1A shows discharge to the environment contrary to the licence granted

CONCLUSIONS

THIS APPLICATION FOR CHANGE SHOULD BE REJECTED ON the grounds that

- A. it is a major change to process
- B. The discharge of waste water of the plant is shown to be to the environment.

- C. The proposed discharge is to wetlands outside the development area.
- D. The proposed discharge is outside the catchment of the process plant.