



Health

Mr Hugo Harmstorf  
Chief Executive Officer  
IPART NSW  
PO Box K35  
HAYMARKET POST SHOP NSW 1240

Your ref D18/34917

Our ref M18/7461

Dear Mr Harmstorf

I refer to your request for a submission on an application by Aquacell Pty Ltd for a network operator's licence at Kurrajong and a variation to their exiting retail supplier's licence.

The application is to provide sewerage services to 35 residential lots with on-site sewage treatment and effluent disposal. NSW Health understands that the effluent irrigation area will be sign posted and there will be no above ground use of effluent. NSW Health notes that Aquacell is not seeking a licence for drinking water supply.

NSW Health has concerns regarding the applicant's application and understanding of the relevant guidelines. Although, the Draft Sewage Management Plan (appendix 4.3.10.1) states that the *Australian Guidelines for Water Recycling* was used to set the appropriate water quality, the preventive risk management framework which includes setting target log reduction values of pathogens based on the intended end uses of recycled water was not followed. There is also inconsistency in the terminology used in the application with reference to both water recycling and effluent disposal.

It is also unclear if the treatment process includes chlorine disinfection which is mentioned in the Martens Concept Recycled Water Management Scheme (appendix 4.3.8.1), but not the application form or Draft Sewage Management Plan (appendix 4.3.10.1).

NSW Health requests that IPART require a risk assessment with relevant stakeholders to ensure that the public health risks are adequately managed. The risk assessment should include the potential impact to residents (including odour) if the irrigation system became clogged and potential for effluent to resurface or run-off during wet-weather periods. I request, as noted previously, that NSW Health is consulted during risk assessments, development of management plans and development of incident notification protocols.

NSW Health's response should not be considered an approval or endorsement of the applicant's documentation. NSW Health's review has focused on potential public health issues. NSW Health expects that the audit process will confirm the adequacy of the management plans and compliance with relevant guidelines.

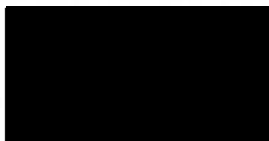
NSW Health

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Thank you for the opportunity to make a submission. Should officers of IPART require further information, please contact Dr Paul Byleveld, Manager Water Unit [REDACTED]. Should the applicant require further information they may contact Mr James Plant, Nepean Blue Mountains Public Health Unit [REDACTED].

Yours sincerely



23/1/19

Dr Richard Broome  
**Director Environmental Health Branch**

**NSW Health**

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