

Our reference: MD14/384 & DOC14/5839

Your reference: 12/665

Mr Hugo Harmstorf
Chief Executive Officer
Independent Regulatory and Pricing Tribunal
PO Box Q290
QVB POST OFFICE NSW 1230

Dear Mr Harmstorf

I refer to your letter to the Minister for the Environment, the Hon Robyn Parker MP, and myself requesting a submission on the application by Lend Lease Recycled Water (Barangaroo South) Pty Ltd for a licence under the *NSW Water Industry Competition Act 2006* for a facility at Barangaroo. Please accept this as a response to all correspondence.

The Environment Protection Authority (EPA) has considered your request and offers the following comments:

- The EPA confirms that as the Water Recycling Plant will essentially comprise of a closed loop arrangement with no discharges to waters, no Environment Protection Licence will be required.
- EPA experience has shown that in similar water recycling facilities, hydrogen sulphide odour emissions (H_2S) can be problematic unless appropriate odour controls are designed, installed and operated. It is noteworthy that *S.128 of the Protection of the Environment Operations Act 1997* requires the occupiers of any premises to prevent or minimise air pollution.
- The operators will need to ensure by careful and ongoing monitoring of treated water quality that chemical impurities (e.g. salt and by-products of disinfection) in the treated water do not over time exceed relevant recycled water guidelines or cause incremental accumulation of pollutants in soils or waters.
- EPA notes that a Site Management Plan (SMP) is proposed which would include provisions for potential use of effluent by irrigation. This SMP should include an assessment of any risk to waters. EPA notes that the details of that plan are not yet available but recommends that the plan should be reviewed by IPART as part of the documentation package to support commercial operation.

If you have any further questions with regard to this issue, please contact Greg Sheehy, Manager Sydney Industry on 9995 6860 or email greg.sheehy@epa.nsw.gov.au.

Yours sincerely

Giselle Howard 7/3/14 .

Giselle Howard
Director Metropolitan
Environment Protection Authority