

2 October 2020



Mr Danny McLean  
Coliban Region Water Authority  
Executive General Manager Service Delivery  
PO Box 2770  
Bendigo DC VIC 3554

Dear Danny,

### **Kyneton Flow Meter and Offsets**

Thank you for meeting with the Environment Protection Authority Victoria (EPA) on 14 September 2020, to discuss matters pertaining to your EPA Licence for the Kyneton Water Reclamation Plant (WRP, premises licence Number. 74405, premises reference 72239, herein referred to as **Licence**). In summary, matters discussed included:

- Current infrastructure works being undertaken, as part of the Kyneton Solutions Project, to create more storage and improved irrigation at the Kyneton WRP.
- The location where river flows are measured to determine compliance with the licence requirement that the discharge must not exceed 20 percent of receiving surface water flow rate.
- Consideration of how works undertaken above the point of discharge, as part of the Offsets Project, could be recognised in the Licence.
- Improvements in the quality of treated water being discharged from the Kyneton WRP to the Campaspe River.

EPA is aware that since the Licence was first issued, the operating environment has changed, with the Campaspe River often experiencing lower and more intermittent flows than expected when the licence was issued. This has resulted in shorter time periods, where compliant discharges can occur to the Campaspe River.

In this context, there are a number of aspects to your Licence that warrant review. To do this, it is critical that EPA outline the principles that it will use when making decisions about any licences changes, as follows:

1. That in any discharge of treated water to the environment, EPA must take action to protect the environment and human health, while recognising that any treated water discharged to waterways will have some impacts which are managed by licence limits and mixing zones.
2. That EPA will not consider any changes that result in a net reduction in water quality entering the Campaspe River than required by the current Licence.
3. That Coliban Water are expected to meet all Licence quality and measurement parameters at the actual point of discharge.
4. That EPA will recognise upstream works completed by Coliban Water to improve water quality, as a credit that can be considered in any revised licence conditions. This may result in a change in licence dilution conditions in the licence.
5. That there is a commitment over time to continue to enhance reuse from the Kyneton WRP and improve net water quality discharged to the Campaspe River.
6. That any risks to downstream users as a result of the discharge are recognised and communicated to impacted downstream users by both Coliban Water and EPA.

**Environment Protection Authority Victoria**

Level 1, 47–51 Queen Street, Bendigo VIC 3550 DX214537 PO Box 1466 Bendigo VIC 3550  
1300 372 842 (1300 EPA VIC) [www.epa.vic.gov.au](http://www.epa.vic.gov.au)



In regard to the dilution ratio, Coliban Water has traditionally measured the flow at the Redesdale gauging station. This was appropriate for measuring the dilution, when the discharge to the river was via Snipes Creek, which is near the Redesdale gauging station. However, when the discharge point changed, the Licence was clear that the discharge from the premises must not exceed 20 percent of receiving surface water flow rate. This is an absolute condition that needs to be complied with at the point of discharge, and not an arbitrary point downstream in the Campaspe River. It is EPA's expectation that the required dilution is met at the point of discharge.

However, EPA is willing to consider a reduced dilution ratio subject to:

- Improvements to water quality discharged
- Commitment to only discharge class B tertiary treated water
- Offsets that have been implemented upstream
- A licence amend application being received from Coliban Water that demonstrates a net improvement of water quality downstream of the discharge point.
- That the dilution rate is measured at the point of discharge to the Campaspe River.
- All changes to the Licence will need to be clearly articulated to the local community through the licence amendment process.

To further such an application EPA requires the last 2 years of offsets reports, data indicating the effectiveness of the new UV unit and suggested revised water quality criteria that takes into account treatment train efficacy for pathogens.

In addition, EPA will require Coliban Water to calculate a mixing zone, based on the revised parameters for discharge which take into account offsets and improved water quality at the discharge point. The calculation must show the extent of impact from the Coliban discharge independent of downstream discharges. Development Assessments Unit can provide examples of this upon request from Coliban Water. This mixing zone will be included as part of the licence. It is expected that the mixing zone will be smaller than the current zone of impact, because of the improvements listed above. Although not previously recognised formally in the Licence, it is a necessary control to protect human health and the environment.

Should Coliban Water decide that it does not wish to go through such a process EPA will hold Coliban to account to meet the 1 in 5 dilution rate at the point of discharge and take compliance and enforcement action should this not be met.

EPA is aware that Coliban Water is currently going through a process to procure new third party reuse. EPA will provide advice and consider new schemes that can demonstrate compliance with Reuse of Reclaimed Water Guidelines.

Appendix A summarises the actions and requested dates for such actions to be completed. Should you have any further queries or concerns please do not hesitate to contact me on 0475 824 820.

Yours sincerely



Paul Ratajczyk  
Team Leader, Compliance and Enforcement

## Appendix A Summary of Actions (Suggested timeframes)

No.	Action Detail	Who	Proposed Date to Complete
1	Coliban Water to provide updated GHD report, articulating offset and water quality improvements, and what reduction in dilution ratio this translates to .	Coliban Water	12/10/2020
2	Coliban Water to provide Offsets monitoring reports for the past 2 years.	Coliban Water	12/10/2020
3	Coliban Water to provide specifications on the new UV system and the water quality parameters that can be consistently met, to inform new licence limit.	Coliban Water	21/10/2020
4	EPA to review information and provide Coliban Water a letter detailing proposed licence limits, including new dilution ratio that would be applicable.	EPA	30/11/2020
5	Coliban Water to engage consultants to calculate required mixing zone, taking into account improved water quality and offsets that have been implemented.	Coliban Water	30/11/2020
6	EPA to review mixing zones document.	EPA	20/12/2020
7	Coliban to lodge licence amendment application.	Coliban	30/01/2021
8	EPA to assess application and undertake community engagement of proposed licence changes.	EPA	06/03/2021
9	Amended licence to be issued.	EPA	01/04/2021