

16 September 2021

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



Dear David,

### **Feedback Licence Potential Licence Amendment Kyneton Water Reclamation Plant.**

Thank you for providing information to EPA on water quality, stream flows and nutrient reductions being achieved by implementation of Environmental Offsets in the Campaspe Catchment. EPA has reviewed the information and provides the following feedback in anticipation of Coliban Water undertaking community Engagement and lodging a licence amendment application to improve the Environmental and Human health outcomes from a continuing licenced discharge to the Campaspe River. At this stage EPA provides this feedback so Coliban Water can undertake community engagement and prepare a licence amendment application. Comments provided here should not be taken as an approval for a licence amendment application and any application will need to be further assessed on its merits.

### **Water Quality Parameters Proposed.**

EPA has reviewed the water quality parameters proposed in a letter to EPA dated 22 March 2021. We note that the proposed water quality includes reduced e.coli limits due to improved plant performance. In general the water quality parameters proposed (excluding flow volume which is discussed separately below) appear to be a significant improvement and EPA is supportive of these being implemented.

In addition to water quality parameters proposed EPA's view is that a licence amendment application will commit Coliban Water to only discharging tertiary treated water to the river and that the tertiary treated water will not contain any wastewater sourced from abattoir waste.

### **Point of Discharge and Measurement of the Dilution Point:**

As previously indicated EPA's view is that the discharge dilution must be measured at the point of discharge into the Campaspe River. EPA has not currently enforced this due to the historical measurement of river flow that is significantly downstream of the point of discharge. Whether a licence amendment is received or not EPA will require Coliban Water to measure dilution at the point of discharge into the river. EPA notes that we have previously documented this position to Coliban Water and allowed time for a transition. As of 30 March 2022 EPA expects Coliban Water to calculate the dilution ratio using river flows at the point of discharge, failure to do so could result in compliance and enforcement action being instigated by EPA.

### **Offsets:**

EPA has reviewed the offsets documentation and most recent reports provided from the monitoring of the program. EPA supports the implementation of this program as it is seen as an efficient way to deliver environmental improvements for the Campaspe River and the catchment. Based on EPA's review of these reports there is a calculated reduction of nutrients entering the catchment of 3,772 kg/year of nitrogen and 550 kg/year of phosphorous. However there are still a number of uncertainties with the

calculation and ongoing benefits of the program. Hence EPA is willing to provide a nutrient credit as a reduction of the dilution rate in the Coliban Water licence for nutrients. EPA takes a conservative stance to ensure environmental benefits are delivered, and considers a 2:1 dilution (river water to treated water discharged) appropriate.

Please note we are still seeking final feedback on the microbiological impacts which may vary the final dilution EPA is willing to accept. EPA is seeking final input specialist advice and will provide this to Coliban Water as soon as this is available.

**Maximum Volume of Discharge:**

EPA considers the daily volume limit on water discharged to the river counterproductive to allowing discharges when there is the smallest impact. Under an amended licence EPA would envisage converting this daily limit to a yearly cap of water discharged to the Campaspe River. This will provide improved environmental and human health outcomes as well as providing increased operational flexibility to Coliban Water.

**Potential for an additional Point of Discharge:**

EPA is open to considering an additional discharge point to Snipes Creek as a reuse, pending details of water quality proposed to be used for an environmental reuse and risk assessment that can demonstrate that release volumes and quality provide beneficial impacts to the Creek and downstream users. In forming up such a proposal EPA would expect that any proposal for such a secondary point of discharge or reuse is consulted with and gains the acceptance of downstream users along Snipes Creek.

Should you have further queries please do not hesitate to contact me on 0475 824 820.

Yours sincerely



Paul Ratajczyk  
Team Leader, Compliance and Enforcement