

EPA Ref: OL000072239

Your Ref:

13 April 2022

Mr Phillip Fasham  
Manager Water Regulations  
PO Box 2770  
Bendigo DC VIC 3554  
[Phillip.Fasham@coliban.com.au](mailto:Phillip.Fasham@coliban.com.au)

Dear Phillip,

**RE: Kyneton WRP Licence amendment application: Licence number – OL000072239**

Thank you for sending a draft of your application for review (submitted 21 March 2022). Before the application can be accepted, there are three key areas that need to be addressed. They are (1) discharge risk assessment; (2) dilution ratio; and (3) community consultation. More details for each issue is provided below:

#### **Discharge Risk Assessment**

The Discharge Risk Assessment (provided at Attachment A of your application) does not meet the expectations of an environmental risk assessment according to EPA's publication 1287. This must be done with reference to Environmental Reference Standards and EPA publication 1287. This approach is needed to summarise the environmental values at risk, define how these will be assessed and provide an overall assessment of the risk. This will be particularly important for EPA and the community to understand how Coliban Water have assessed the risks

For example:

- It does not follow the recommended approach in 1287 with problem formulation, risk analysis, and risk characterisation.
- section 2.1 (page 3 of Attachment A) only discusses the broadest view of the catchment, but does not give any detail on the environmental values likely to be at risk from the current and future discharge.
- Following the introduction, the report moves straight into detailed monitoring and risk assessment without establishing why the monitored endpoints relate to environmental values.
- The methodology to generate a risk score is described on page 131 of Attachment A. However the results of the risk scoring are not summarised with reference to a standard risk matrix. For example, in Table 19, the Total Risk Score suggests a reduction in risk, without any consideration of whether the current and future risks would be considered acceptable. These risk scores should be evaluated according to a standard risk matrix with a defined consequence and likelihood
- While the Total Risk Score is a useful method to consider overall risk, the individual components of the risk also need consideration.



**Environment  
Protection  
Authority Victoria**

200 Victoria Street  
Carlton VIC 3053

GPO Box 4395  
Melbourne VIC 3001

**DX** 210082

**T** 1300 372 842  
1300 EPA VIC

**W** [epa.vic.gov.au](http://epa.vic.gov.au)



**Dilution Ratio and mixing:**

- The draft application proposes a discharge at approximately two-thirds the flow of the stream. Further supporting evidence is required to justify this dilution factor.
- Generally, with such a low dilution factor, EPA in addition to median limits (ammonia and other toxicants) also requires maximum limits or at least upper percentiles (90 or 95%) and would need to see scenarios tested using these upper limits and mixing zones defined using the upper limits to demonstrate protection of environmental values. Furthermore, worst case scenarios of pH and temperature are also required to demonstrate that ammonia toxicity is not reached, or dangerously low DO levels (due to BOD inputs) are not reached.
- At what point downstream would the discharge no longer present an elevated risk to potential recreational uses and those who may irrigate this on vegetables eaten raw (noting the longer this zone, the higher the likelihood of the risk to occur). This point should be considered in the context of community consultation below.

**Community consultation**

- It is not clear what community involvement/engagement there has been in the proposal.

If you have any queries on the above please contact David Robinson at [David.Robinson@epa.vic.gov.au](mailto:David.Robinson@epa.vic.gov.au).

Yours sincerely



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