

27/02/18

Mr Chris Madsen
Manager: Asset Planning
Central Gippsland Region Water Corporation
PO Box 348
Traralgon VIC 3844

Reference: 1003054

RE: Drouin Waste Water Treatment Plant upgrade – construction of new membrane bioreactor plant

Dear Mr Madsen,

The Authority is in receipt of a Pathway Application for upgrade of the waste water treatment facilities at the Drouin treatment plant.

The proposal involves the construction of a membrane bioreactor (MBR) wastewater treatment plant, and associated infrastructure. This upgrade will replace the existing drip filter treatment and dissolved air filtration treatment facilities.

It is understood the proposal is planned to increase the treatment capacity of the Plant, in accordance with population growth in Drouin. This upgrade is expected to reduce the incidence of emergency discharges, and provide more consistent water quality of discharges.

An assessment of the pathway application has been undertaken based on the following documents:

- Pathway form dated 14 February 2018;
- Locality Plan;
- EPA Amalgamated Licence 74253 Amended 16 02 2017;
- KBR Consulting Odour Report;
- SLR Environmental Design Noise Assessment;
- All Hazards Incident Management Plan;
- Gippsland Water Agribusiness Procedure for Irrigation at Drouin WWTP;
- GHD Drouin Discharge Environmental Risk Assessment Report;
- Desktop review to inform groundwater risk assessment - Drouin WWTP;
- Drouin Precinct Structure Plan - September 2014;
- Gippsland Water Environmental Management System (EMS) Manual;
- Gippsland Water Environment and Climate Change Policy
- Approvals Identification Report;
- Communications and Engagement Plan;
- Fact Sheet - A new future for Drouin's growth - Wastewater Treatment Plan; and,



**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



- Flora and Fauna Assessment.

Based on this assessment, it is considered that the appropriate approval pathway for the proposed development is a Standard Works Approval (WA).

However, the Authority is concerned that the increased volume of discharges to surface water may pose risks to the environment. A doubling of discharge volume to Shillinglaw Creek is likely to significantly increase the mixing zone, which presently appears to exceed licensed limits (confluence of Shillinglaw and King Parrot Creeks). There is presently no risk assessment available for the modified discharge conditions under the proposal, nor clear indication of changes to projected discharge water quality. It is recommended that the future application consider improvements in water quality of discharges.

Groundwater contamination by the lagoon system has been identified as a high risk in the submission, and there is presently a lack of data regarding the integrity of the lagoon lining, and the quality and depth of the local groundwater systems.

Additionally, while the proposed works are not expected to result in large changes to acoustic and odour outputs, present separation distances do not satisfy EPA policy and guidance.

It is noted that the pathway application does not address these issues and the likely biophysical and social impacts of the proposal.

It is recommended that prior to any further consideration of the matter that a site meeting and conference be held between yourself/consultants, and the Environmental Protection Authority to discuss the proposed expansion of the development.

Should you require any further information, please contact me on (03) 91945256 or at bryant.gagliardi@epa.vic.gov.au.

Yours sincerely,

Bryant Gagliardi
Project Officer – Works Approval
Development Assessments Unit