

10 January 2012

Belinda Scott
Acting Senior Compliance Officer
Major Projects Assessments
Department of Planning

Belinda.Scott@planning.nsw.gov.au

Dear Belinda

Re: Picton Regional Sewerage Scheme Modification

Thank you for forwarding the above application for comment.

We have reviewed the proposed modifications to the above scheme but due to time constraints have not had an opportunity to conduct a site visit. We note that it is licensed and operated in accordance with usual EPA schedule 1 requirements under the Protection of Environment Operations Act 1997, being "a scheme with a processing capacity above 2,500 persons equivalent capacity or 750 kilolitres per day and involves discharge of wastes to land or waters".

We note effluent disposal is by reuse to a 175 ha farm. Section 2.2 of the Assessment Report details the constraints and performance of the scheme to date in relation to this license. We have not received any complaints about the scheme to date. Our main concern would be that emissions to the environment from the disposal farm do not compromise the drinking water catchment.

The scheme currently has spare capacity and the modifications will support additional connections of new growth areas. We fully endorse these developments being serviced by a properly designed centralised sewerage scheme. The alternatives of either private schemes or on-site systems for individual properties generally have inherent operational and maintenance issues. With sewage management being one of its core businesses Sydney Water has the expertise to service these new developments.

From our perspective it seems a straight-forward proposal and I provide the following comments:

- The operators should ensure compliance with reporting protocols to Ministry of Health for pump station dry weather overflows,
- The Sydney Catchment Authority should be consulted in relation to potential off site environmental surcharges,
- The scheme should comply with OEH scheduled premises licensing requirements and any license modifications which may be imposed associated with the proposed expansion of the scheme. The OEH should be satisfied that the existing on-site farm effluent reuse area and environs has the capability to manage the loadings.
- Finally it is noted that the original scheme included provision for a treated effluent reuse scheme (1.1) which was not constructed. Modern schemes often incorporate some form of reuse and we would encourage this. Again Sydney Water has expertise in this area in relation to water treatment, reuse water quality, risk assessment and plumbing requirements. A reuse scheme would have considerable benefits including reducing loadings on the disposal farm and excess discharge to Stonequarry Creek. If this reuse option is again likely to be reconsidered we would seek to be consulted and have input as standards have changed since the original approval of this scheme.

I trust this advice is satisfactory but please do not hesitate to contact myself or Graham Burgess on 9515 9420 if you need further clarification.

Yours sincerely



Dr Stephen Conaty
Acting Director Public Health Unit