



Our reference: DOC14/302355
Contact: Jacinta Hanemann (02) 9995 6867

Ms Karen Jones
Director Infrastructure
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Jones

I refer to your letter of 5 December 2014 inviting the NSW Environment Protection Authority (EPA) to make a submission on Sydney Water's request for modification to the existing approval for the Picton Water Recycling Plant to amplify the plant.

The EPA has reviewed the Environmental Assessment (EA) prepared by Sydney Water in relation to the modification and our comments are detailed below.

The EPA currently regulates the operation of the Picton sewage scheme, including the Picton Water Recycling Plant, through an environment protection licence (No. 10555) issued to Sydney Water under the *Protection of the Environment Operations Act 1997* (POEO Act).

In accordance with the POEO Act, the environment protection licence can apply to all activities being undertaken on the licensed premises. The construction work associated with the amplification of the Picton Water Recycling Plant will therefore be regulated under the environment protection licence. Should the modification be approved, Sydney Water will need to submit a licence variation application to include these works on its licence.

The EPA considers that the environmental impacts of the construction works (in terms of air quality, odour, noise and water) should be able to be managed to have minimal impact on the surrounding environment and sensitive receivers. The EA indicates that some works may be required outside of standard construction hours and may have noise impacts on sensitive receivers. The EPA requests that any 'out of hours works' be regulated via the licence and that an approval process for such works not be duplicated through the planning approval.

The EA indicates that the amplified Picton Water Recycling Plant would operate within the odour and noise limits of the existing licence. The EA does not address the potential water quality impacts of the amplified Picton Water Recycling Plant. The EPA notes that 'options to manage and/or reuse the additional effluent produced by the Water Recycling Plant are currently being considered and that the preferred option will be the subject of a separate assessment process' and that Sydney Water has had preliminary discussions with the EPA in relation to this matter. However, without this information, it is not possible for the EPA to undertake a full assessment of this proposal at this time.

Please contact Jacinta Hanemann on (02) 9995 6867 should you wish to discuss this matter further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Frank Garofalow', followed by the handwritten date '2-2-15'.

FRANK GAROFALOW
Manager Metropolitan Infrastructure
Environment Protection Authority