



Our reference: EF13/3959: DOC14/38755-02  
Contact: Kirsty Pearson 02 6229 7002

Mr Chris McGillick  
NSW Department of Planning & Infrastructure  
PO Box 39  
SYDNEY NSW 2001

8 April 2014

Dear Mr McGillick

**RE: Googong Water Cycle Project (MP 08\_0236 MOD 2) –  
Proposed Modification 2 - Notice of Exhibition**

The Environment Protection Authority (EPA) thanks you for the opportunity to comment on the proposed modification of the Googong Water Cycle Project. Details of the proposed changes to the project are outlined in the report "Modification to Approved Project: Googong: Township Integrated Water Cycle Project" prepared by RPS Australia and dated 10 March 2014.

The EPA has reviewed the report and notes that the proposed additional discharge point is to make provision for the discharge of recycled water which does not meet the "recycled water" health based criteria, but does meet environmental discharge requirements. This situation might arise during failures in the disinfection process for recycled water which may make it unsuitable to be re-used, but it would still meet EPA licensed discharge criteria and would therefore be suitable for discharge into Googong Creek through the existing outlet structure immediately downstream of Beltana Park. Adding the discharge point would also accommodate discharges of recycled water which meet environmental discharge requirements during the process verification and water treatment plant commissioning period, where no demand for re-use of that water is anticipated, and it may not meet the health based re-use criteria.

The requirements of the Australian Guidelines for Recycled Water are different from the ANZECC Water Quality objectives assessment process used by the EPA to set environmental discharge requirements in the original project approval process for the Googong Township Water Cycle Project. The approved operating scenarios for excess recycled water will remain the same, only the discharge location is likely to change as a result of this proposed modification. For this reason, the EPA will not need to change any of its recommended (environmental) water quality discharge limits. The report predicts the volume of discharges through the proposed new discharge point to be 0.5% of total volume discharged to the environment in an average year. It is therefore considered that the discharge of recycled water during process verification or a CCP failure would not significantly increase the potential risks to downstream users of Queanbeyan River.

The construction of the proposed new discharge point and pipeline will take place over 2014-2015 for an expected duration of 30 days. Construction phase impacts on water quality have been adequately assessed in the report. The potential noise and odour arising from the proposed development have also been reviewed. The Project Approval condition D1 specifies the limits for noise which will be applied to the

additional pumps, to be 35 dB(A) LAeq(15min) for the nearest residential receiver. The potential for odour impacts is being addressed by the installation of a new 6-14 m vent shaft, 250 mm in diameter, above the end of the rising main and gravity main connect adjacent to Googong Dam Road. With these measures in place it is expected there will be no additional noise or odour generated with this proposed modification.

After reviewing and considering the report, the EPA supports the proposed addition of a 'Discharge point 3' to Googong Creek immediately downstream of the pond at Beltana Park to address potential issues with discharges to the environment that do not meet health criteria for recycled water use at Point 1, but do meet environmental discharge criteria.

The Environment Protection Licence covering the construction and operation of the WRP will need to be modified by the EPA prior to any construction works associated with this modification. The licence holder will need to apply for this variation if this modification is approved. The environmental discharge limits already prescribed in the Project Approval will be included as conditions of the EPL (albeit with the addition of the proposed discharge point). The EPA previously flagged that after an initial operating period, the we would look to set 100th percentile (absolute maximum) limits to apply to the discharge of recycled water to the environment. In order for these to be set, GTPL and QCC will be required to provide monitoring data to demonstrate compliance with the EPL conditions and the performance of the water treatment plant once it is operational.

I trust this information is of assistance. Should you have any queries or wish to discuss the EPA's response, please contact me or Kirsty Pearson on Ph: 6229 7002.

Yours sincerely



**JULIAN THOMPSON**  
**Unit Head – South East Region**  
**NSW Environment Protection Authority**