

8 October 2021



Mr David Sheehan  
Coliban Region Water Authority  
Executive General Manager Service Delivery  
PO Box 2770  
Bendigo DC VIC 3554

Dear David,

**Supplementary Feedback Licence Potential Licence Amendment Kyneton Water Reclamation Plant.**

Further to the letter dated 15 September 2021, EPA provides additional advice as a result of our review of microbiological aspects of the proposed discharge to river at Kyneton. This additional advice below should be read in addition to the advice previously provided.

EPA confirms that a dilution rate of 1:2 (reclaimed water to river water, effluent making up a maximum of 33% of river flow) is able to be considered for a class B discharge from the Biological Nutrient Reduction (BNR) Plant provide this plant does not receive abattoir wastes.

In regard to *E.coli* limits EPA would consider licence limits if water is treated to class B standard. To achieve this, there would be an expectation that the *E.coli* licence limits be an upper limit of 100 orgs/100mL based on 95<sup>th</sup> percentile, with an EPA notification limit of 200 orgs/100mL, measured at the plant discharge point. EPA notes that this notification limit is lower than that proposed by Coliban Water.

In any mixing zone there would be a requirement to consult with downstream users about restrictions in use within the mixing zone. Where public access is available in this mixing zone there would be a requirement to provide signage, warning of the restrictions. Wording of the signage would need to be approved by EPA.

In relation to helminths, EPA would require Coliban Water to undergo validation of the treatment system to achieve the required log reductions 4 Log based on the AGWR. If validation is gained and accepted by EPA and AgVic, Coliban Water would also be expected to commit to critical control points for maintaining treatment train efficacy. For Helminths a suitable turbidity critical control point is recommended. If validation of the treatment train for helminths cannot be achieved, it is EPA's expectation that an upgrade to the treatment plant would be required so required log reductions are met.

If at any time Coliban Water decided to treat abattoir wastes through the BNR plant and discharge this to the river this would increase pathogen risks. Under such a scenario EPA would expect that additional disinfection to be installed at the plant to deliver the same level of environment and human health protection. Coliban Water may also consider additional disinfection at the plant to further lower pathogen risks. Additional disinfection will not lower dilution rate further, however may provide higher assurance regarding potential reuses in the mixing zone and further downstream.

Should you have further queries please do not hesitate to contact me on 0475 824 820.

Yours sincerely



Paul Ratajczyk  
Team Leader, Compliance and Enforcement

**Appendix A Summary of Actions (Suggested timeframes)**

No.	Action Detail	Who	Proposed Date to Complete
1	Coliban Water to provide updated GHD report, articulating offset and water quality improvements, and what reduction in dilution ratio this translates to .	Coliban Water	12/10/2020
2	Coliban Water to provide Offsets monitoring reports for the past 2 years.	Coliban Water	12/10/2020
3	Coliban Water to provide specifications on the new UV system and the water quality parameters that can be consistently met, to inform new licence limit.	Coliban Water	21/10/2020
4	EPA to review information and provide Coliban Water a letter detailing proposed licence limits, including new dilution ratio that would be applicable.	EPA	30/11/2020
5	Coliban Water to engage consultants to calculate required mixing zone, taking into account improved water quality and offsets that have been implemented.	Coliban Water	30/11/2020
6	EPA to review mixing zones document.	EPA	20/12/2020
7	Coliban to lodge licence amendment application.	Coliban	30/01/2021
8	EPA to assess application and undertake community engagement of proposed licence changes.	EPA	06/03/2021
9	Amended licence to be issued.	EPA	01/04/2021