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ATT: Richard Whyte

**Subject: Proposed Variation to Delta Electricity's licence 766.**

The Hawkesbury Nepean Catchment Management Authority (HNCMA) has briefly reviewed documentation associated with the proposed variation to Delta's licence to discharge No: 766 and makes the following comments.

Licence condition No: L3

HNCMA supports the introduction of specific limits for electrical conductivity, Aluminium, Arsenic, Boron, Copper, Fluoride, Nickel and Zinc and review of the limit for Sulphates.

HNCMA also supports the introduction of monitoring of gross discharge amounts to enable a more complete assessment of the impact of discharges on the environment.

HNCMA suggests that the 6 month review includes consideration of the appropriateness of the use of twelve month rolling average concentrations, given the potential for higher impacts during some seasonal conditions.

Licence condition No: U2

HNCMA understands that the variation to U2 is a proposed addition to U2 and not a replacement of the existing U2.1.

This addition would allow cooling tower blowdown water from Wallerawang power station to be discharged to the Coxs River without treatment in the event of the WTP being unavailable. The discharge of untreated water would have a significant impact in an environment adjusted to reduced discharge levels and have the potential to reverse the environmental gains made by the installation of the treatment plant.

HNCMA suggests that there is a need to investigate other options for storage or treatment when the WTP is unable to function.

HNCMA notes that the current monitoring conditions in Deltas existing licence include a minimum of monthly monitoring for the additional parameters and suggests that the monthly results be made available to OEH.

HNCMA comments are restricted to information available on the OEH website. We note that supporting documentation referred to in section 8 as '*data as provided to the OEH presentation of 2 August 2011*' is not available.

Thank you for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bernie Bugden', written in a cursive style.

Mr Bernie Bugden  
General Manager