



**DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/D2/19/0141/24**

**D: PCM REFERENCE NUMBER 19/3/2/4/D2/20/PMIM031/25**

**ENQUIRIES:** RUSSELL MEHL

**DATE: 29 August 2025**

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Dear Sir /Madam

**COMMENTS ON THE PRE-APPLICATION REPORT FOR THE PROPOSED UPGRADE OF THE GWAING WWTW ON ERF RE/464 GEORGE**

The above-mentioned report has been received and reviewed by the Directorate of Pollution and Chemicals Management (D: PCM) and the following comments must be addressed:

1. The upgrade must take place without reducing the current capacity of the Gwaing WWTW. The upgrade plan must include how capacity will be retained during the construction phase when it becomes necessary to take certain equipment items offline to be replaced or refurbished. This is especially important during winter and periods of high inflows.
2. The current discharge point or any areas that impact on the Gwaing River is of a concern as repair of piping infrastructure is often required. These infrastructure items are often damaged due to natural occurrences such as flooding or storms. Fig 4 of the aquatic study shows that the infrastructure proposed may be impacted on parts of both perennial and non-perennial water courses. Does this upgrade include a River Maintenance Management Plan (MMP) to deal with emergency work that may be required. This is listed as part of activity 19 on page 34.
3. On page 34 of the report do the six items listed under Phase B waste reduction and resource recovery form part of this EIA process or will it be applied for separately.

4. In situations where sewage piping infrastructure has been compromised as a result of stormwater ingress, a much higher volume of inflows can be expected. Has an assessment been made of these compromised connections and has the additional inflow volumes been catered for in the Phase 1 upgrade.
5. Will the new design and process alterations be able to cope with specialized inflows such as leachate from the landfill (often delivered by vacuum tankers), as well as sludge from the Water Treatment Works that was previously received by the WWTW and that have been problematic in the past?

The Department awaits your final reports and reserves the right to revise to provide additional comment on this application should any further relevant information become available.

Yours faithfully,

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**Mr. Russell Mehl**  
**Control Environmental Officer: Pollution Policy and Regulatory Services**

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