



## Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

### Section A – Licence Details

Licence number:	L4201/1991/11	Licence file number:	DEC6295
Licence holder:	Water Corporation		
Trading as:	Woodman Point Wastewater Treatment Plant		
ACN:	28 033 434 917		
Registered address:	629 Newcastle Street, LEEDERVILLE, WA 6007		
Reporting period:	01 / 07 / 2019 to 30 / 06 / 2020		

### Section B – Statement of Compliance with Licence Conditions

Did you comply with all of your licence conditions during the reporting period?  
(please tick the appropriate box)

- Yes – please complete:
- section C;
  - section D if required; and
  - sign the declaration in Section F.

- No – please complete:
- section C;
  - section D if required;
  - section E; and
  - sign the declaration at Section F.

### Section C – Statement of Actual Production

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Production Quantity
54: sewage facility	143,526.42 m <sup>3</sup> /d (details in Annual Environmental Report)
61: Liquid waste facility	26.37 m <sup>3</sup> /d (details in Annual Environmental Report)

### Section D – Statement of Actual Part 2 Waste Discharge Quantity

Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.3.1	Date(s) of non-compliance:	21 <sup>st</sup> August 2019
Details of non-compliance:			
Monthly final effluent sampling required under condition 3.3.1 of L4201/1991/11 was missed in July 2019. This was identified during monthly reporting on 21 <sup>st</sup> August 2019.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
There was no impact to the environment as a result of this missed regulatory sampling event. Internal operational sampling was carried out as normal, with results within expected parameters.			
Cause (or suspected cause) of non-compliance:			
Due to an error in the laboratory sampling programme, sampling forms for site operators were not generated as per normal. This was not noticed by laboratory and site staff.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A number of new processes were established to prevent reoccurrence of this incident. These include: <ul style="list-style-type: none"> <li>• Central Laboratory staff to check correct generation of sampling forms for all regulatory samples every month.</li> <li>• Site Technical Advisors to double check the laboratory sampling programme by the second week of every month to ensure all regulatory samples were received by the external lab.</li> <li>• Site operators to alert Technical Advisors if regulatory sample bottles are not received on the first Tuesday of the month.</li> </ul>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.7	Date(s) of non-compliance:	7 <sup>th</sup> October 2019
Details of non-compliance:			
At 01:40 on 7 <sup>th</sup> October 2019, a section of Reclaimed Effluent (RE) pipe behind Egg Shaped Digester #1 burst, causing a spill of RE to ground. The spill was an average of 30L/s until 07:10, giving a calculated volume of 594kL. Approximately 50% of this volume (300kL) was infiltrated to the ground, with the rest contained in bunding and sumps.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Reclaimed Effluent (RE) is the same quality of effluent that is discharged to the Sepia Depression Ocean Outlet Line (SDOOL), 4.2km offshore. Using the S-P-R methodology, the following was considered:			
<ul style="list-style-type: none"> <li>• <b>Exposure:</b> no access to public, trained Water Corporation staff with PPE</li> <li>• <b>Surface water:</b> no surface flow from site</li> <li>• <b>Odour impacts:</b> residents 750m to east, wind direction during incident from SE, no complaints received</li> <li>• <b>Groundwater:</b> no bores in area, high quality of RE, depth to groundwater 19m – dilution and attenuation effects</li> </ul>			
Based on the above assessment, the risk of any noticeable or enduring environmental impact occurring through this event is considered low.			
Cause (or suspected cause) of non-compliance:			
A section of the RE pipe was not well supported and the burst occurred at the bend. As it happened outside of business hours it was not identified until the morning.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The broken section of pipe was isolated via the valve closest to the burst. Vacuum trucks were deployed for recovery of contained effluent from the sumps and bunds, which was returned to the plant. A work order was raised to have the pipework repaired. A new pipe support will also be engineered to provide confidence this pipe will not burst again.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 09/10/2019	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.7	Date(s) of non-compliance:	14 <sup>th</sup> January 2020
Details of non-compliance:			
At 7am on 14th January 2020, site staff at Woodman Point WWTP noticed an overflow of centrate from the bund at Centrifuge #3. Approximately 50kL was lost, with 20kL contained in the bund and onsite infrastructure, and 30kL lost to ground.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
<p>Centrate is the liquid component of the effluent from the digesters – a tertiary treatment process that removes pathogens. Centrate can be expected to have high nutrients and suspended solids. Using the S-P-R methodology, the following was considered:</p> <ul style="list-style-type: none"> <li>• <b>Exposure:</b> no access to public, trained Water Corporation staff with PPE</li> <li>• <b>Surface water:</b> no surface flow from site</li> <li>• <b>Odour impacts:</b> residents 750m to east, wind direction during incident from SE, no complaints received</li> <li>• <b>Groundwater:</b> no bores in area, high quality of centrate, depth to groundwater 19m – dilution and attenuation effects</li> <li>•</li> </ul> <p>Based on the above assessment, the risk of any noticeable or enduring environmental impact occurring through this event is considered low.</p>			
Cause (or suspected cause) of non-compliance:			
The centrate pump discharge line was partially blocked, and the standby pump was out for maintenance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A licenced vacuum truck attended site and removed all visible evidence of the overflow. Inspection of the site on the following day demonstrated satisfactory clean up of the recoverable component. The duty pump was taken out in order to remove the restriction and the standby pump was reinstalled.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 15/01/2020	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.7	Date(s) of non-compliance:	2 <sup>nd</sup> June 2020
Details of non-compliance:			
<p>An incident occurred at Woodman Point WWTP on 2<sup>nd</sup> June 2020 during maintenance activities at the inlet works / grit tanks. There are 2 grit tanks; one was down for maintenance whilst the other was in use. Double isolation (using stop logs) is required before tank maintenance work can commence. During the double isolation task, the stop log was inserted in the grit tank that was operational. This caused the screened raw effluent from Munster Pump Station to overflow to the ground within the WWTP. This occurred at 11.50am for 7 minutes and resulted in 1.092ML of effluent on the ground before the flow could be safely redirected and contained.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>Raw influent can be expected to have high nutrients, BOD, <i>E coli</i> and suspended solids. Using the S-P-R methodology, the following potential impacts were considered as part of this incident:</p> <ul style="list-style-type: none"> <li>• <b>Exposure:</b> no access to public within WWTP, trained Water Corporation staff with PPE</li> <li>• <b>Surface water:</b> no surface flow from site, fully infiltrated</li> <li>• <b>Odour impacts:</b> residents 750m to east, fast infiltration, no complaints received</li> <li>• <b>Groundwater users:</b> surrounding area has groundwater unsuitable for garden bores and not within or near a PDSWA (ref DWER Perth Groundwater Map), depth to groundwater 19m</li> <li>• <b>Lateral movement of potentially impacted groundwater:</b> groundwater moves westerly towards Jervoise Bay (sensitive receptor). However, the existing data set does not confirm if it fully migrates to the ocean. Previous monitoring (2016 and prior) shows historically elevated nutrients due to previous land use within and upgradient of the WWTP. Lateral movement of the infiltrated wastewater is expected to be extremely slow due to a flat gradient, with ongoing attenuation of nutrients and pathogens.</li> </ul> <p>Based on the above assessment and the detailed S-P-R, the risk of any noticeable or enduring environmental impact on sensitive receptors occurring through this event is considered low. Notwithstanding the slow lateral movement, a planned groundwater monitoring event in the near future may assist in determining the accuracy of this assessment.</p>			
Cause (or suspected cause) of non-compliance:			
A failure of the onsite isolations processes was the primary cause of this event.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An investigation identified a number of improvements to the isolation process that are in the process of being implemented, including update to the grit tank isolation work instruction and re-training in such, as well as an engineering solution of installing a locking mechanism on the tank stop log.			

Section E – Details of Non-Compliance with Licence Condition	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 04/06/2020

<b>Section F – Declaration</b>			
I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular <sup>1</sup> .			
I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.			
Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	General Manager Operations	Position:	
Date:	07/08/2020	Date:	
Seal (if signing under seal):			

<sup>1</sup> It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

<sup>2</sup> AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.