



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Once completed, please submit this form either via email to info@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	4511/1967/14	Licence file number:	L4511/1967/14
Licence holder name:	Midland Brick Pty Ltd		
Trading as:	Midland Brick		
ACN:	635 664 710		
Registered business address:	Ground Floor, 67 Walters Drive, OSBORNE PARK WA 6017		
Reporting period:	01/07/2022 to 30/06/2023		

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)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">• section C;• section D (if required); and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D (if required);• section E; and• sign the declaration in 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
41 Clay Bricks or Ceramic Products Manufacturing	Supplied separately under exemptions provided by Clause 8(2) of the FOI Act
77 Concrete Batching or Cement Products Manufacturing	Supplied separately under exemptions provided by Clause 8(2) of the FOI Act

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
N/A	N/A

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	Date(s) of non-compliance:	18/11/2022
Details of non-compliance:			
Potential exceedance of Hydrogen Chloride emission limit of 100 mg/m ³ . The measured value was 160 mg/m ³ .			
What was the actual (or suspected) environmental impact of the non-compliance? NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Non-compliance was at location A3 (stack 10) No environmental impacts were observed, or odour detected during this period.			
Cause (or suspected cause) of non-compliance:			
Result was inconsistent with operating conditions at that time.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
On receiving notification of the potential exceedance, the Kiln Supervisor immediately increased the lime addition and inspected the scrubber to verify all systems were working and lime consumption was at the required rate. A stack retest was organized for the earliest date of 19/12/2022.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 17 / 01 / 2023	

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	Date(s) of non-compliance:	18/11/2022 and 19/12/2022
Details of non-compliance:			
<p>18/11/2022 - Potential exceedance of Total Oxides of Sulphur (as SO₂) emission limit of 200 mg/m³. The measured value was 1100 mg/m³.</p> <p>19/12/2022 Retest - Potential exceedance of Total Oxides of Sulphur (as SO₂) emission limit of 200 mg/m³. The measured value was 540 mg/m³.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>Non-compliance was at location A3 (stack 10)</p> <p>No environmental impacts were observed, or sulphur odour detected in the exhaust during this period.</p>			
Cause (or suspected cause) of non-compliance:			
Potential suspected cause of high sulphur in emissions was sulphur in raw materials.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>On notification on the 15/12/22 the Kiln Supervisor contacted the Technical Manager and a review of potential sources of sulphur in the emissions was undertaken. As a precautionary measure the Technical Manager immediately adjusted the clay mix with the objective of reducing the use of potential sulphur containing raw materials and awaited retest results. On the 12/01/23 the Kiln Supervisor was notified that retest results had significantly reduced sulphur levels but were still potentially above limits. Following notification on the 12/01/23 management immediately implemented a clay mix change to eliminate raw materials suspected of high sulphur content and requested another retest on the 18/01/2023.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 17 / 01 / 2023	

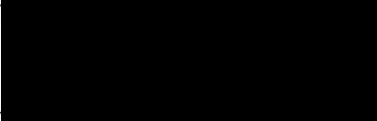

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3	Date(s) of non-compliance:	10/01/2023
Details of non-compliance:			
Potential exceedance of Hydrogen Chloride emission limit of 100 mg/m3. The measured value was 200 mg/m3.			
What was the actual (or suspected) environmental impact of the non-compliance? NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Non-compliance was at location A3 (Stack 10) No environmental impacts were observed, or odour detected during this period.			
Cause (or suspected cause) of non-compliance:			
This result was not consistent with operating conditions and previous and subsequent stack tests.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Lime addition had been increased after the stack test high result on the 18/11/22. Another stack retest was scheduled for the 27/02/23 to confirm levels were below limits.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 24 / 02 / 2023	

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	Date(s) of non-compliance:	10/01/2023 and 18/01/2023
Details of non-compliance:			
<p>10/01/2023 - Potential exceedance of Total Oxides of Sulphur (as SO₂) emission limit of 200 mg/m³. The measured value was 750 mg/m³.</p> <p>18/01/2023 Retest - Potential exceedance of Total Oxides of Sulphur (as SO₂) emission limit of 200 mg/m³. The measured value was 220 mg/m³.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>Non-compliance was at location A3 (stack 10)</p> <p>No environmental impacts were observed during this period. Sulphur odour was not detected in the exhaust.</p>			
Cause (or suspected cause) of non-compliance:			
Work continued to identify the source of the sulphur in raw materials including testing of relevant raw materials to identify the source of high sulphur clay.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The retest on the 18/01/23 was only just above the limit. Further testing of raw materials continued to identify sources of sulphur in raw materials and blending of clay mixes. Another retest was scheduled for the 27/02/23.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 24 / 02 / 2023	

Section F – Declaration

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 particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Chief Executive Officer	Position:	
Date:	26/7/23	Date:	
Seal (if signing under seal):			

¹ 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.

² 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.