



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L4726/1991/15	Licence file number:	DEC794-02
Licence holder:	Water Corporation		
Trading as:	Subiaco Wastewater Treatment Plant		
ACN:	28 033 434 917		
Registered address:	629 Newcastle Street, LEEDERVILLE, WA 6007		
Reporting period:	01 / 07 / 2021 to 30 / 06 / 2022		

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 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	62,594 m ³ /d (details in Annual Environmental Report)
61: Liquid waste facility	0 m ³

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:	2.2.2	Date(s) of non-compliance:	23/08/2021
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Details of non-compliance:

As part of the chemical dosing refurbishment works (NSO submitted dated 15/07/2021), Subiaco WRRF installed a temporary chemical dosing system which ran in the absence of the permanent chemical dosing system. On 23/08/2021, it was identified that due to issues with pumping hypochlorite and sodium hydroxide from the temporary dosing system, H₂S levels at the stack were elevated above the licence limit of 5 mg/m³ for 12 hours – to a maximum 5.65 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.

It is not anticipated that there were any environmental impacts of this non-compliance, as the H₂S levels were only slightly above that which is allowed in the Licence. No complaints from the community were received during this time.

Cause (or suspected cause) of non-compliance:

There were issues with the chemical dosing through the temporary dosing system due to pressure variances not allowing an adequate amount of chemicals to pump into the scrubber to treat higher H₂S content.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

In the immediate term, project personnel increased the hypochlorite and sodium hydroxide dosing to bring H₂S levels back within licence and operational limits. The long term fix was to reset the pressure set points on the temporary chemical dosing system; this resolved the issue and it did not occur again for the remainder of the project.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

Reported to DWER in writing

Date: 01/09/2021

Section E – Details of Non-Compliance with Licence Condition			
Condition no:	2.2.2	Date(s) of non-compliance:	21/01/2022
Details of non-compliance:			
<p>As part of the chemical dosing refurbishment works (NSO submitted dated 15/07/2021), Subiaco WRRF experienced intermittent high levels of H₂S through the OCF as part of testing, tie in, and commissioning works.</p> <p>The Subiaco WRRF Licence requires quarterly NATA accredited measurement and analysis of treated air at the stack and the December 2021 quarterly monitoring event coincided with high H₂S as part of the project. This delivered a result of 4.5ppm / 6.8mg/m³ for the December 2021 quarterly monitoring event, above the limit of 5mg/m³ in Condition 2.2.2 of the Licence.</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>It is not anticipated that there were any environmental impacts of this non-compliance, as the H₂S levels were only slightly above that which is allowed in the Licence. No complaints from the community were received during this time.</p>			
Cause (or suspected cause) of non-compliance:			
Monitoring was not conducted under “normal operating conditions” as per Table 3.2.1, Note 2 of Licence. Intermittent odour increases due to the project works were anticipated, and DWER were notified of same, meaning that the OCF was not under normal operating conditions at the time of monitoring occurring.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
To ensure regulatory quarterly sampling is carried out under normal operating conditions as per the licence, the contract manager has arrange for the third party monitoring consultant to contact site the day before arrival, so any abnormal conditions can be raised and sampling moved if required.			
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: 24/01/2022	

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:	3.2.1	Date(s) of non-compliance:	09/12/2021 – 31/01/2022
Details of non-compliance:			
The H ₂ S continuous monitor on the OCF stack was unable to take readings due to instrument error.			
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.			
There was no actual or suspected environmental impact due to this non-compliance. All plant and OCF operations and maintenance were as expected, and an NSO was in place for project works on the OCF chemical dosing system that generated intermittent high odour. No complaints were received in this time.			
Cause (or suspected cause) of non-compliance:			
Instrumentation error (particularly due to moisture build up in the line between the sampler and analyser) was the primary reason for the failure to take readings. The missed data was not identified as the feedback fault system was not working.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Increased maintenance regime on the analyser has resolved the problem in the medium term, as has a successful fix on the feedback system. A capital project has been raised to address the feedback system, and to move the entire analyser cabinet closer to the sampler to prevent instrumentation errors.			
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: – via Annual Environment Report.	

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 particular ¹ .			
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:		Position:	
Date:	25/8/2022.	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.