



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

### Section A – Licence Details

Licence number:	L4726/1991/16	Licence file number:	DEC794-02
Licence holder:	Water Corporation		
Trading as:	Subiaco Water Resource Recovery Facility		
ACN:	28 033 434 917		
Registered address:	629 Newcastle Street, LEEDERVILLE, WA 6007		
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)

- 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	60,757 m <sup>3</sup> /d (details in Annual Environmental Report)
61: Liquid waste facility	0 m <sup>3</sup>

### 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

<b>Section E – Details of Non-Compliance with Licence Condition</b>			
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:	14	Date(s) of non-compliance:	10/02/2023
Details of non-compliance:			
Regulatory inflow, irrigation and outflow meters as required by the Licence (M1, M2, ML1 and MSW1) were identified as being outside calibration requirements as recommended by the manufacturer.			
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.			
It is not anticipated that there were any environmental impacts of this non-compliance, as the flow meters were determined by other methods (such as comparison of data with non-regulatory, internal plant meters; comparison with historical data; and water balancing) to be within an acceptable tolerance.			
Cause (or suspected cause) of non-compliance:			
New site personnel were not confident in their understanding of what plant instrumentation is considered regulatory, versus operational. As such, time and funding for maintenance and calibrations were not allocated correctly in all cases.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A working group was established to carry out a thorough review of the sites' regulatory instrumentation. The below actions were put in place for the identified gaps in compliance.  <b>Inflow Meters (M1 &amp; M2):</b> Follow vendor recommendation for two yearly jetwash, inspection and sensor clean. <b>Outflow Meter (MSW1):</b> Annual inspection by vendor to carry out verification. <b>Onsite Irrigation Meter (ML1):</b> Meter to be replaced and a request for capital funding has been sought. Interim solution has been put in place involving modification of the programme logic to minimise totalisation errors.			
Was this non-compliance previously reported to DWER?			
Not required to be reported before this AACR			
<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			
Condition no:	31	Date(s) of non-compliance:	13/03/2023
Details of non-compliance:			
Failure to provide notification to DWER of action that may increase odour emissions, with 72 hours' notice.			
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 is no suspected or actual environmental impact of this non-compliance. There were no complaints received from the public related to this event.			
Cause (or suspected cause) of non-compliance:			
Due staffing issues, the requirement to advise relevant internal personnel of the upcoming maintenance work with 72 hours' notice was not met. Notification to DWER was instead provided with 24 hours' notice.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
During a subsequent investigation meeting it was determined that a 2 week internal notification timeframe between site and office staff is to be implemented when planning odour generating maintenance works. This allows plenty of time to prepare regulator communications that will meet all Licence conditions. This new process was rolled out to all Plant Managers during a toolbox session, and posters were pinned up at all licenced sites as a reminder.			
Was this non-compliance previously reported to DWER?			
Not required to be reported before this AACR			
<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:	7	Date(s) of non-compliance:	05/06/2023
Details of non-compliance:			
<p>Approximately 1ML of secondary treated wastewater was discharged from the final effluent pump station into the onsite infiltration basin.</p> <p>As per the Licence, the authorised discharge point is “SW2 - Perth Main Drain via emergency overflow basin”. As this discharge was held in the basin and did not reach the Perth Main Drain, this constitutes a non-compliance.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
There was no actual or suspected environmental impact of this non-compliance. This basin is designed for the infiltration of treated wastewater, and recent risk assessments and site investigations (previously supplied to DWER) have demonstrated low risk to receptors from this activity.			
Cause (or suspected cause) of non-compliance:			
The site experienced unusually high inflows due to an extreme rainfall event. The programmed logic for the final effluent pump station is designed to initiate a controlled discharge to the basin in these events to avoid the risk of overflow in public areas, including the Perth Main Drain.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Continued monitoring of the programmed logic in the pump station to ensure optimised flows to the outfall. Monitoring of weather events to prepare the plant for high inflows and reduce risk of overflow to as low as reasonably practicable.			
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: 05/06/2023	

**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 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:	13 SEPT 2023	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.