



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L5961/1991/12	Licence file number:	DER2014/001269
Licence holder:	Water Corporation		
Trading as:	Geraldton No.2 Water Resource Recovery Facility		
ABN:	28 003 434 917		
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)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required; and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required;</li><li>• section E; and</li><li>• sign the declaration at Section F.</li></ul>

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	Inflow 1814 m <sup>3</sup> /day

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
Not Applicable	

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:	1.3.2 & 1.3.3	Date(s) of non-compliance:	25/02/2022
Details of non-compliance:			
<p><i>Condition 1.3.2 states:</i>  <i>The Licensee shall only allow waste to be accepted on to the Premises if:</i>  <i>(a) it is of a type listed in Table 1.3.1;</i>  <i>(b) the quantity accepted is below any limit listed in Table 1.3.1; and</i>  <i>(c) it meets any specification listed in Table 1.3.1</i></p> <p><i>Condition 1.3.3 states:</i>  <i>The Licensee shall ensure that the wastes accepted onto the Premises are only subjected to the process(es)</i>  <i>set out in Table 1.3.2 and in accordance with any process limits described in that table.</i></p> <p>An unlicensed pit was being used to dispose of wastewater sucked from wet wells, as part of routine maintenance, where the wastewater was known or suspected to have high fat/ rag loads. Rather than disposing into the primary pond via the tanker receival point, operationally the decision was made to dispose into this pit on an ongoing basis to prevent maintenance issues and sludge build up in the primary pond. The wastewater was disposed of in this pit and the rags/ fat were allowed to dry before removal to a licenced landfill facility. It was identified that the pit did not have sufficient lining on the base to prevent leachate to groundwater.</p> <p>The pit first appeared on historical aerial imagery in the 2001 and was used as a sludge drying bed.</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> <p>There is the potential of some level of groundwater contamination due to this practice.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Failure to adequately decommission an asset once it had been deemed redundant is the suspected cause of the incident. Operational Staff assumed that the presence and signage on the pit meant that it was licensed for use. Following upgrades in 2015 which included the construction of a compliant sludge drying bed, this pit was deemed no longer necessary however was not decommissioned appropriately.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Disposal of wastewater into this pit was ceased immediately. Contaminated material was removed from the pit, sampled and disposed of at the Meru Landfill Facility. Soil sampling in the pit following the removal of contaminated material indicated no residual soil impacts.</p> <p>Planning is underway to retrofit the pit to adequately contain and return leachate to primary pond. A licence amendment will be requested from DWER to ensure the pit is an acceptable storage/ drying area for the material, prior to disposal at a landfill facility.</p>			

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	<input type="checkbox"/> No
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing (N1 notification)	Date: 04 /03 / 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:	3.1.1 (e) & 3.4.1	Date(s) of non-compliance:	15/12/2022
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Details of non-compliance:

*Condition 3.1.1 (e) The Licensee shall ensure that all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured unless indicated otherwise in the relevant table.*

*Condition 3.4.1 The Licensee shall undertake the monitoring in Table 3.4.1 according to the specifications in that table and record and investigate results that do not meet any limit specified.*

Table 3.4.1 requires TDS to be analysed/tested for bore 06/17. The lab did not test and report back the TDS for this sample.

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.

No environmental impact from this non-compliance

Cause (or suspected cause) of non-compliance:

Sample was recorded as 'no result' in the Corporations Operational Data Storage System.

The missed analysis exceptions report sent to SGS Lab identified that there was no reading provided and SGS identified booking error for JP123263.003. Only pH was gridded for this sample.

TDS was missed in the registration and when it was picked up, sample was already out of holding time.

The Corporations Wastewater Governance report for November reported the missing result.

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

The technical advisor for wastewater analysis has been reminded to follow up when the Governance Report notes missing result so a resample can be taken.

The laboratory error has been recorded as part of the Corporations Key Performance Indicators

for the subcontractor.	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	<input checked="" type="checkbox"/> No
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing (N1)	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:	3.2.1	Date(s) of non-compliance:	15/12/2022
Details of non-compliance:			
<p><i>Condition 3.2.1 The Licensee shall undertake the monitoring in Table 3.2.1 according to the specifications in that table. Total Phosphorus limit 12mg/L</i></p> <p>The final effluent sample on 15/12/2022 was returned at 15mg/L. Follow up sample 11/01/2023 returned at 12mg/L, 13/02/2023 – 11mg/L, 25/03/2023 – 11mg/L</p> <p>Elevated final effluent results (without regulatory limits or regulatory requirements to sample) also returned in this sample event:                      BOD:300                      COD:660                      FRP:12.1                      TURB:170</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> <p>No environmental impact from this non-compliance</p>			
Cause (or suspected cause) of non-compliance:			
<p>The sample taken on the 15/12/2022 which returned this exceedance were more typical of raw influent therefore it is suspected that human error was the cause of this exceedance rather than an issue with treatment and final effluent quality. There was no increase of inflow to the plant in December 2022 and January 2023 which indicates that hydraulic retention time for the influent remained steady.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Discussions have taken place with samplers to ensure the correct sample procedure is being followed. Samplers undergo reassessment each year to ensure they are still familiar with sample procedures.</p>			
Was this non-compliance previously reported to DWER?			

Department of Water and Environmental Regulation

<input checked="" type="checkbox"/> Yes, and		<input type="checkbox"/> No	
<input type="checkbox"/> Reported to DWER verbally	Date: / /		
<input checked="" type="checkbox"/> Reported to DWER in writing (N1)	Date: 06/01/2023		



### 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:	3.4.6, 3.4.7, 3.4.8	Date(s) of non-compliance:	18/06/2021
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Details of non-compliance:

These non-compliances were identified through an internal audit. Three (3) conditions relate to the submission of a triennial review of the ambient groundwater monitoring data to validate the 'Rockwater Report 2010' modelling data, as submitted for the new infiltration ponds. Report due 25 February 2020.

The validation report was not submitted to DWER by the 25<sup>th</sup> February 2020.

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 is no observed environmental impact.

Cause (or suspected cause) of non-compliance:

Whilst developing the review of the groundwater model to validate the Rockwater Report 2010, data gaps were identified which prevented the modeling and review from being accurate. As such no report was submitted until these data gaps could be closed out.

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

Water Corporation aimed to address data gaps through the ongoing Contaminated Sites Investigation (CSI) on site. An Environmental Consultant company identified further investigations are required to address these data gaps. Water Corporation is developing Technical Advice and a groundwater monitoring plan for this site which will facilitate discussions with DWER on this condition.

Was this non-compliance previously reported to DWER?

Yes, and  No

Reported to DWER verbally

Date: / /

Reported to DWER in writing (2020-2021 AACR)

Date: 1 / 09 / 2021

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:	4.1.1_Table 4.1.1	Date(s) of non-compliance:	18/06/2021
Details of non-compliance:			
<p>IR2 – Required a report to DWER confirming actions in IR1 ‘nutrient management strategy’ which have been completed and the outcomes of those actions. Report due 31 June 2018.</p> <p>We have undertaken quarterly groundwater monitoring of nutrients on selected bores but that we have not used this data to rerun the groundwater model for the purpose of validating the Rockwater model by Sep-Dec 2019.</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> <p>There is no environmental impact.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Data gaps were identified during the development of the reports to confirm the Improvement Program actions and a decision was made expand monitoring program to determine if the Contaminated Sites Investigation (CSI) would provide adequate information to submit reports.</p> <p>Groundwater investigations are ongoing in accordance with the Contaminated Sites Act 2003 (CS Act) to characterise the nature and extent of nutrient impacts in groundwater. This information is required to confirm the improvement reference actions.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Water Corporation aimed to address data gaps through the ongoing Contaminated Sites Investigation (CSI) on site.</p> <p>In accordance with ongoing CS Act investigations, additional bores are required to be installed in 2023 and monitored through 2024 to key address data gaps. More information will be provided in the 2023-2024 reporting year.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and <input type="checkbox"/> No			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing (2020-21 AACR)		Date: 1 / 09 / 2021	

**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 Group	Position:	
Date:	15 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.