



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L5980/1991/7	Licence file number:	2010/002819-1
Licence holder:	Water Corporation		
Trading as:	Exmouth 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	714 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(b) - (b) the quantity accepted is below any limit listed in Table 1 (980m <sup>3</sup> / Day)	Date(s) of non-compliance:	07/06/2023
Details of non-compliance:			
<p>Inflows to the WWTP have exceeded the daily inflow limit of 980m<sup>3</sup> on the following occasions during the 2022-2023 reporting period.</p> <p>A magflow was installed and from Sept 2022 the following exceedances for the 2022-2023 period were recorded.</p> <ul style="list-style-type: none"> <li>• 24hr period 19 April 2023 Daily Total Inflow Volume = 1018.13 m<sup>3</sup>/d (Exceeded by 38.13 m<sup>3</sup>)</li> <li>• 24hr period 21 April 2023 Daily Total Inflow Volume = 1060.58 m<sup>3</sup>/d (Exceeded by 80.58 m<sup>3</sup>)</li> </ul>			
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>			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
Increased population in the town over peak periods such as school holidays has resulted in the exceedance of licenced inflows.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Planning is underway to determine the future of the Exmouth WWTP capacity, design and location.</p> <p>Pond plants are designed to balance high and low flow periods such as this in fluctuating tourism towns. There is minimal risk of overtopping ponds due to these occasional exceedances. Actual daily inflow limits are generally considered unsuitable for pond plants due to the ability to balance fluctuating flows.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and <span style="margin-left: 200px;"><input type="checkbox"/> No</span>			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing (N1 Notification)		Date: 07/09/2023	



<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:	1	Date(s) of non-compliance:	23/04/2023
Details of non-compliance:			
<p>During the total solar eclipse in Exmouth K210 tankered waste from a temporary camping area was disposed of directly in the Primary Pond via the tanker receival point.</p> <p>Total volume 194,900L in the Month of April. According to the licence only K130 waste is licensed to be disposed of into the pond.</p>			
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.			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
Initially planning was for waste to be disposed of in the conveyance network however, due to safety, public health, resourcing and amenity reasons the decision was made to dispose of the waste directly into the pond.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Early discussions with DWER indicated that only K130 waste would be disposed of into the ponds however the waste was classified by the carrier as K210 waste. Neither the volume or the make-up of the waste is considered to have impacted treatment and disposal of the wastewater.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and <span style="margin-left: 200px;"><input checked="" type="checkbox"/> No</span>			
<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:	2, 3, 11, 28	Date(s) of non-compliance:	23/04/2023
Details of non-compliance:			
<p>Sludge removed from Shire Pond 1 and stored in Shire Pond 2.</p> <p>No advance notification was provided to the DWER. This was a breach of licence.</p> <p>Condition 28 (Table 12) - stipulates that the notification requirement for the removal of sewage sludge shall be “no less than 14 days in advance of works”.</p> <p>Condition 2 – waste processing (sludge leachate not returned to pond 1 and infiltrating into Shire Pond 2.</p> <p>Condition 3 – only allowed to store wastewater in shire pond 2 and not returning leachate to the start of the treatment process.</p> <p>Condition 11 – Emissions to land (infiltrating sludge leachate).</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 the non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>In preparation for the Total Solar Eclipse (TSE) event in April 2023 – organised by the Department of Jobs, Tourism, Science and Innovation (JTSI) – Water Corporation was required to ensure that it had adequate risk mitigation controls in place to contend with an expected significant increase in wastewater volumes over the two weeks of the TSE event (circa 17-30 April 2023).</p> <p>Works under Capital project CS25180 to prepare the Exmouth WWTP to receive additional flow included desludging the Shire’s reuse pond 1 to reduce the likelihood of sludge impacting disinfection of the TWW. The contractor deposited the sludge into Shire Pond 2.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The total volume of sludge was removed from the Shire Pond 2 and disposed of at the Shire’s tip as approved by the shire.			
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: 18/07/2022

**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:	8(a)	Date(s) of non-compliance:	15/07/2022, 17/07/2022 26/07/2022, 07/08/2022
---------------	------	----------------------------	--

Details of non-compliance:

15/07/2022 – Pond 3 overtopped approximately 1000L onto the embankment between Pond 1 and 3. Wastewater pooled on the embankment. Pond was isolated the same day to prevent further overtopping

17/07/2022 – Valve to Pond 3 was reopened on the 16/07/2022 afternoon, and Pond 2 overtopped again at the same location. Volume of less than 1000L.

26/07/2022 – Ponds 1 and 2 overtopped total volume of 2000L. WW from Pond 1 pooled on embankment and small percentage flowed into Pond 3. WW from Pond 2 pooled on the embankment.

07/08/2022 – Pond 3 overtopped approximately 1000L onto the same location.

A pump was in place to transfer TWW to Pond 3 while the Shires reuse scheme was offline.

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 the non-compliance.

Cause (or suspected cause) of non-compliance:

Consecutive faults on the Shire of Exmouth reuse disinfection unit and reuse pumps and delays in sourcing replacement parts and contractors caused this non-compliance.

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

Water Corporation worked closely with the Shire of Exmouth to reinstate the disinfection unit by providing advice, support and resources to expedite repairs to the disinfection unit which would allow reactivation of the reuse scheme.

A pump was used to transfer treated wastewater into the emergency infiltration pond and pond levels were monitored and managed as close as possible over the period the reuse scheme was unavailable.

Was this non-compliance previously reported to DWER?

Yes, and  No



<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing (N1 Notification)		Date: 18/07/2022	
<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:	Condition 8 (b)	Date(s) of non-compliance:	18/05/2022
Details of non-compliance:			
<p>Condition 8 (b) requires all treatment ponds to maintain a 300mm freeboard.</p> <p>In early April 2022, the Shire of Exmouth reuse scheme went offline following consecutive samples indicating a high E. coli presence in reuse scheme due to disinfection faults. On 21 April 22, it was identified that the levels in the treatment ponds were increasing, and that action was required to maintain freeboard. On the same day the Copper Ioniser pump was modified to pump treated wastewater from Pond 3 to the onsite emergency infiltration pond. On the 18<sup>th</sup> May it was identified that the copper ionizer pump had failed to pump at a rate that was sufficient to maintain freeboard and that 300mm freeboard had been lost on Pond 3, an additional larger pump was sourced. The additional pump was installed and started pumping treated wastewater from Pond 3 to the onsite emergency infiltration pond on the 25 May 22 to prevent overtopping of pond.</p> <p>On the 17<sup>th</sup> July 2022 it was identified that Ponds 1 and 2 had lost freeboard.</p> <p>Freeboard was reported to have been restored to all three ponds on 15/11/2022.</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 the non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Consecutive faults of the Shire of Exmouth reuse disinfection unit and reuse pumps and delays in sourcing replacement parts and contractors caused this non-compliance.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Water Corporation worked closely with the Shire of Exmouth to reinstate the disinfection unit by providing advice, support and resources to expedite repairs to the disinfection unit which would allow reactivation of the reuse scheme.</p> <p>A pump was used to transfer treated wastewater into the emergency infiltration pond and pond levels were monitored and managed as close as possible over the period the reuse scheme was unavailable.</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 (2021-2022 AACR)		Date: 30/10/2022	

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:	Condition 8c “the integrity of the containment infrastructure is maintained”	Date(s) of non-compliance:	30/03/2023
Details of non-compliance: (INC-070395)			
Water balance indicates that WRRF treatment ponds are seeping approx., 137 kL/day, thereby having an unauthorised discharge, via infiltration, to the environment.			
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>A review of groundwater monitoring data has been undertaken as part of annual reporting.</p> <ul style="list-style-type: none"> <li>• Both down-hydraulic bores continue to show a increasing trend for Ammonia as N, concentrations 100-fold higher down-gradient compared to up-gradient.</li> <li>• TN concentrations in the up-hydraulic gradient bore remain elevated above 30 mg/L, but are showing a decreasing trend. Both down-hydraulic gradient bores show a increasing trend for TN and concentrations are elevated above 10 mg/L, however, still lower than up-gradient.</li> <li>• TP concentrations in all bores remain stable/decreasing with concentrations measured around the laboratory limit of reporting (LOR).</li> <li>• E. coli and copper concentrations remain below LOR.</li> </ul>			
Cause (or suspected cause) of non-compliance:			
Loss of pond liner integrity and/or erosion may be a contributing factor.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An Asset Deficiency Record (ADR) has been entered and will be reviewed, allocated resources and/or funds to further investigations.			
Water Corporations Asset Planning department is undertaking a reassessment of the water balance to determine seepage rate and pond permeability. It is unknown which pond/s is seeping, whether by erosion or liner integrity or a combination of factors.			
Continued monitoring of groundwater bores as per licence requirements (condition 18), will provide visibility whether infiltration has impacted groundwater downstream of the site. The 2022/2023 AER provides an analysis of groundwater monitoring results and any observed			



trends.	
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 (AACR 2021-2022)	Date: 30/10/22

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:	Condition 18. Table 8	Date(s) of non-compliance:	03/05/2022
Details of non-compliance:			
Condition 18, Table 8 requires groundwater monitoring bore 3/94 to be sampled for pH, Copper, TDS, TN, TP, Ammonia, Nitrate, Nitrite, BOD and E. coli on a six-monthly basis. The bore was sampled in October 2021 however was unable to be sampled in April 2022 as required.			
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.			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
Bore 3/94 appears to have been hit by a vehicle. The bore is located outside the fenced boundary of the WWTP.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The bore was repaired in April 2023 and the April regulatory groundwater sampling was completed on this bore.			
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 (AACR 2021-2022)	Date: 30/10/22

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:	Condition 1.3.5 (c)	Date(s) of non-compliance:	03/06/2021
Details of non-compliance:			
Condition 1.3.5 (b) The Licensee shall manage all wastewater treatment and infiltration ponds such that the integrity of the containment infrastructure is maintained.			
An internal audit raised that erosion is evident on the embankments of Pond 1 and 3			
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.			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The Exmouth WWTP is reaching its capacity limits and heavy rain events are likely contributors to the erosion.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A project has been developed to repair the erosion of the embankments however it has yet to be assigned funding or scheduled. As the inflows into the plant can exceed daily inflow limit during high tourism times, longer term planning is being undertaken to relocate the Exmouth WWTP.			
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: 16/07/2021		



<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:	Condition 1.3.3 and 1.3.4	Date(s) of non-compliance:	03/06/2021
Details of non-compliance:			
Conditions 1.3.1 and 1.3.4 require leachate from the sludge drying process to be returned to Pond 1 (the start of the treatment process). Currently, leachate from the onsite sludge drying bed is directed into Pond 2.			
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.			
No environmental impact from the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The design of the sludge drying bed does not adhere to the licence conditions as leachate is directed into Pond 2 rather than Pond 1.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Sludge drying bed has been decommissioned. Future desludging will require the design and construction of a new, compliant sludge drying bed.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and <span style="margin-left: 200px;"><input type="checkbox"/> No</span>			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing (N1 Notification)		Date: 16/07/2021	



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:	Condition 3.2.1	Date(s) of non-compliance:	03/06/2021
Details of non-compliance:			
<p>Condition 3.2.1 requires quarterly monitoring of residual chlorine of backwash water from the Shire pump station. Additionally, this information should be reported in the Annual Environmental Report.</p> <p>No monitoring of the backwash water has been undertaken or reported on in recent years.</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 the non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Following improvements made to the Shire of Exmouth’s chlorination system in 2019, it was reported that the backwash from the Shire’s pump station was being discharged into the Shires storage ponds. This breakdown in communication caused confusion as the backwash was still being discharge to the backwash pond.</p> <p>During the 2021-2022 reporting year, samples were unable to be taken due to the ongoing investigations into discharge location, difficult scheduling manual backwash with Shire of Exmouth (automatic backwash occurs at night) and two occasions of the reuse scheme being offline due to faults.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Sampling of the backwash water has recommenced and is scheduled to continue.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and <span style="margin-left: 200px;"><input type="checkbox"/> No</span>			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing (N1 Notification)		Date: 16/07/2021	



**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	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.