



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V Division 3*

Once completed, please submit this form either via email to [info-der@dwer.wa.gov.au](mailto:info-der@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:	L6245/1991/8	Licence file number:	DER2013/001026
Licence holder:	Water Corporation		
Trading as:	Wickham Wastewater Treatment Plant		
ACN:	28 033 434 917		
Registered address:	629 Newcastle Street, LEEDERVILLE, WA 6007		
Reporting period:	01/07/2019 to 30/06/2020		

### 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	774 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 (Table 1.3.1)	Date(s) of non-compliance:	February and March 2020
Details of non-compliance:			
Average daily inflow into the WWTP in February 2020 was 1,078 m <sup>3</sup> /day and 985 m <sup>3</sup> /day in March 2020 exceeding the approved premises production capacity of 950 m <sup>3</sup> /day.			
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.			
The significant increase in inflow resulted in the evaporation basins overflowing to the tidal flats immediately adjacent to the WWTP which began in February 2020 and has continued intermittently throughout the year.			
Cause (or suspected cause) of non-compliance:			
Increase in groundwater height as a result of rainfall caused groundwater ingress into the WWTP vitreous clay inflow pipes, which contributed to an exceedance of the approved premises production capacity.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> <li>• Initial investigation undertaken to determine ingress into vitreous clay pipes</li> <li>• Capital program to rectify known ingress issues accelerated and completed</li> <li>• Further investigation to be completed to assess conductivity throughout the sewer system to identify more areas of ingress.</li> </ul>			
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: 8/02/2020	

**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:	1.3.5 (a)	Date(s) of non-compliance:	February to present 2020
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Details of non-compliance:

Treated wastewater exceeded treatment plant evaporation basin capacity and overflowed (via overflow and spillway) to the adjacent tidal flats.

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.

A baseline assessment (BA) was undertaken for the site in 2019 to characterise potential environmental, human health and amenity risks associated with current and historical site operations, including releases to the tidal flats. The BA involved desk-based review of the environmental attributes of the site to develop a preliminary conceptual site model (CSM). The preliminary CSM identified potentially complete source-pathway-receptor (SPR) linkages relevant to the site and associated data gaps warranting further investigation, as per following table.

Source	COPC	Release Mechanism	Potential Exposure Pathways	Potential Receptors	SPR Linkage	Discussion
WWTP (on-site ponds - TWW and WW)	Nutrients, microbial pathogens and metals	Overland flow of TWW and discharge off-site	Direct contact with TWW run-off of impacted surface water	Recreational users of tidal flats	Potentially Complete	Recreational users may be incidentally exposed to TWW discharged off-site as overland flow/surface run-off.
				Ecology of tidal flats and marine environment	Potentially Complete	Ecology of mangrove ecosystem exposed to TWW discharged off-site via overland flow/surface run-off.
		Leakage from ponds through unsaturated zone to groundwater	Saturated zone transport	Recreational users of tidal flats	Potentially Complete	Recreational users may be incidentally exposed to TWW/WW discharged off-site in groundwater (e.g. during shallow digging).
				Ecology of tidal flats and marine environment	Potentially Complete	Ecology of mangrove ecosystem exposed to TWW/WW discharged off-site via groundwater uptake.

**Notes:**  
 COPC = Contaminant of potential concern  
 WW = Wastewater

Cause (or suspected cause) of non-compliance:

An increase in groundwater height as a result of rainfall caused groundwater ingress into the WWTP vitreous clay inflow pipes, which then exceeded approved premises production capacity. Evaporation basins capacity was exceeded as a result of the increase in inflow, and they overflowed to the tidal flats. A reduction in the amount of water taken by the tertiary treatment plant (especially during and following rainfall events) exacerbates this.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> <li>• Initial investigation undertaken to determine ingress into vitreous clay pipes</li> <li>• Capital program to rectify known ingress issues accelerated and completed</li> <li>• Further investigation to be completed to assess conductivity throughout the sewer system to identify more areas of ingress.</li> <li>• Baseline assessment completed to determine source-pathway-receptor (SPR) linkages</li> <li>• Eight groundwater monitoring bores installed and monitoring program commenced</li> <li>• Environmental Site Assessment (ESA) currently underway to collect relevant purpose-driven data to address the identified data gaps in the preliminary Conceptual Site Model understanding, and enable reappraisal of potential risks posed to human health, the environment and environmental values associated with historical and ongoing site operations.</li> </ul>	
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: Ongoing

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 Environment Regulation's (DER) website.			
Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	General Manager Operations	Position:	
Date:	24/08/2020	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.