



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Once completed, please submit this form either via email to info@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:	L6917/1997/8	Licence file number:	DER2014/000670-1
Licence holder name:	Town of Port Hedland – South Hedland Landfill		
Trading as:	Town of Port Hedland		
ACN:	19 220 085 226		
Registered business address:	Lot 5813 on plan 189435 South Hedland		
Reporting period:	01/01/2019	to	31/12/2019

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 in 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
64 Class II or Class III Putrescible	11,445 tonnes domestic putrescible 13,612 tonnes commercial industrial
61 Liquid Waste	21,528,541 litres
57 Used Tyres	1,195 tonnes

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
61 Liquid Waste	0

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:	Annual Reporting
Details of non-compliance:			
<p>The Licensee failed to submit to the CEO an Annual Environmental Report by 1 February for the Annual periods 2017 and 2018.</p> <p>The Licensee Representative advised that they were unaware of the Annual Environmental Report requirement via email on 19 March 2019.</p> <p>The Licensee was requested to provide the 2018 Annual Environmental Report and subsequently provided it on 27 March 2019.</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>			
None			
Cause (or suspected cause) of non-compliance:			
Lack of knowledge of reporting requirements due to high staff turnover			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Folders have been set up for future years with instruction for the Annual Environmental Report to be included in the AACR			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<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:	1.3.3 (legacy waste)	Date(s) of non-compliance:	Waste storage within 35m of the premises boundary
Details of non-compliance:			
<p>This waste was noted to be historical legacy waste and located on the north, east and southern boundaries of the premises. Officers noted that current landfilling activities were occurring in compliance with condition 1.3.3.</p> <p>The Licensee Representative advised Officers at the time of inspection the Town of Port Hedland had already identified this as a project to be undertaken (after initial budget delays) in the 2019-20 financial period.</p> <p>The Licensee Representative provided the Request for Tender (2018-24) for the South Hedland Landfill North Eastern Corner Excavation and Profiling Works (Earthmoving Project). The tender details the works required to be undertaken to establish a 35 metre distance between the premises boundary and any waste. DWER understands that the works will involve excavating approximately 15,000 cubic metres of legacy-landfilled areas that are in excess of 5 years old.</p> <p>The Department requested that all waste be located at least 35 metres from the premises boundary by 30 June 2020.</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>			
No environmental impacts are suspected from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Legacy waste landfilling.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>There was a request for tender put out for this work in 2018 and the cost estimates that were returned were prohibitory, so it was determined that the work would be done gradually to spread the cost over time.</p> <p>The works are now complete, with the distance from the fenceline now at 17-20m which has been discussed with both engineers and DWER representatives as being suitable provided a licence amendment application is accepted. If the amendment is not accepted further work will be completed at a later date. The slope of the landfill is now at 1:5 in line with the BPWM Guidelines for landfill management.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<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:	1.3.3 (after hours disposal area)	Date(s) of non-compliance:	Temporary waste storage within 35m of the premises boundary
Details of non-compliance:			
<p>It was observed that a 24 hour disposal point had been created at the front of the landfill premises (outside of the premises fence but within the premises boundary) allowing residents afterhours access for waste disposal into designated skip bins. Four skip bins were being utilised for temporary waste collection and storage.</p> <p>At the time of inspection the Licensee Representative advised that the area had been created to help reduce and mitigate significant illegal dumping issues the Town of Port Hedland was facing. The Licensee Representative advised that the bins were emptied every morning upon the opening of the landfill and left again each night after the landfill is closed, except on Sundays when the landfill remains closed.</p> <p>The Licensee Representative explained the afterhours skip bin area was a temporary measure and that the Town of Port Hedland was planning the construction of a Community Recycling Centre (CRC) as a permanent solution. The Licensee Representative advised that the CRC had recently passed its conceptual design phase and was now entering into the detailed design phase, prior to the submission of the necessary requests to DWER for construction. The Licensee Representative advised that the CRC construction was currently planned for the 2019-20 financial year and once completed there would be no requirement for the after-hours area.</p> <p>DWER has found the Town of Port Hedland's current course of action adequate in addressing the non-compliance with the licence.</p>			
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 impacts are suspected from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Mitigation of illegal dumping prior to the construction and commissioning of the Community Recycling Centre which is planned to operate 7 days per week in order to reduce illegal dumping in the region.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The CRC is still underway, with detailed designs provided and under review from Council. Construction is planned to commence in the coming FY.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

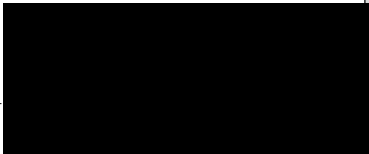
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.3	Date(s) of non-compliance:	Storage of batteries
Details of non-compliance:			
<p>Vehicle batteries were not stored in a fully enclosed bunded area/container.</p> <p>At the time of inspection Officers observed numerous vehicle batteries stored in the recycling area on open ground on wooden pallets.</p> <p>The Department requests that vehicle batteries be stored in a fully enclosed bunded area/container by 30 June 2019.</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>Potential leaching of battery acid.</p>			
Cause (or suspected cause) of non-compliance:			
Incorrect storage procedures			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>As per the DWER response letter dates 1/5/19, bunds were purchased for the storage of batteries. Once the CRC is constructed there will be a fully enclosed area for the correct disposal of batteries.</p> <p>The CRC is still underway, with detailed designs provided and under review from Council. Construction is planned to commence in the coming FY.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<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:	1.3.3	Date(s) of non-compliance:	Monitoring of treated waste water
Details of non-compliance:			
<p>The Licensee had failed to undertake the monitoring in Table 2.3.1 according to the specifications in that table. Specifically the Licensee had not undertaken monitoring for the following parameters: Biochemical Oxygen Demand, Total Suspended Solids, Total Dissolved Solids, Total Nitrogen and Total Phosphorus. Furthermore, E. Coli was reported in MPN/100 mL units and not CFU/100 mL as required.</p> <p>The Department notes that the Town of Port Hedland utilises this water in its dust suppression around the landfill premises, which are considered to be publically accessible areas.</p> <p>The Department requests that monitoring in accordance with the licence commences immediately with a treated wastewater sample to be taken by 12 April 2019, as advised by in email to Christopher Adekunle on 5 April 2019, and the laboratory analysis results provided by 26 April 2019.</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>			
If there was non-compliance then the water may have caused health concerns with human contact.			
Cause (or suspected cause) of non-compliance:			
Failure to meet water monitoring conditions			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Samples were provided to DWER on 24 April 2019, and moving forward all waste water monitoring to meet conditions outlined in Table 2.3.1.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

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 particular¹.

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:	Manager Waste Operations	Position:	
Date:	20 Feb 2020	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.