

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:	Town of Port Hedland		
Trading as:	Town of Port Hedland		
ACN:	19 220 085 226		
Registered address:	Lot 5813 on Plan 189435, South Hedland		
Reporting period:	1 / 01 / 2023 to 31 / 12 / 2023		

Section B – Statement of Compliance with Licence Conditions
Did you comply with all your licence conditions during the reporting period? (Please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"> section C section D if required, and sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> 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
57 – used tyre storage (50,000 tyres per annum) 61 – liquid waste facility (max 32,850 tpa) 64 – Class II putrescible landfill (100,000 tpa)	57 - Tyres in:148 tonnes – Tyres out: 128 tonnes 61 - Liquid waste: 19,271 tonnes 64 - Class II: 52,781 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

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 7 and 9	Date(s) of non-compliance:	2023
Details of non-compliance:			
<p>The TOPH operates an unmanned after-hours disposal area at the front of the landfill facility (northern boundary) which allows customers to dispose of waste. The after-hours area was established to mitigate the impacts of widespread illegal dumping across the town, and to provide a temporary solution to allow the landfill to close on Sundays.</p> <p>Waste disposed within these bins is not subject to any waste acceptance controls and is disposed directly to landfill (except for the scrap metal bin).</p> <p>The location of this disposal area is within 35m of the boundary of the premises which is non-compliant with licence requirements which states no waste shall be temporarily stored or landfilled within 35m of the boundary.</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>			
Given the unknown nature of the composition of waste disposed, environmental impacts are unknown however risks are present for both customers using the bins and staff handling the waste.			
Cause (or suspected cause) of non-compliance:			
Inability to implement suitable waste acceptance controls on site due to the drop off area being unstaffed and being open when the landfill is closed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The after hours disposal area has been discontinued following Councils approval in August 2023 to extend the opening hours of the Facility to include Sunday. This has eliminated the need for the after hours bins.			
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: AACR 2019, 2020, 2021, 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	Date(s) of non-compliance:	Listed below
Details of non-compliance:			
<p>There were nine minor unauthorised fires within the landfill disposal area over the reporting period. These were as follows:</p> <ul style="list-style-type: none"> • 25th January 2023 • 15th March 2023 • 5th April 2023 • 6th September 2023 • 21st September 2023 • 6th October 2023 • 10th October 2023 • 20th October 2023 • 21st October 2023 <p>There was one significant fire at the landfill on 29 August 2023. This was reported to DWER on 30 August 2023 (DWER pollution response reference number ICMS 71209).</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>			
Smoke emissions on receptors			
Cause (or suspected cause) of non-compliance:			
All fires were attributed to the combustion of lithium ion batteries disposed within general refuse.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The fire incidents were managed on site effectively by staff. They were smothered with dirt and water applied with watercart (where required). All fire water was contained in the premises boundary.</p> <p>To prevent recurrence the Town has now partnered with Ecobatt under the E- Cycle battery Recycling Stewardship Scheme to become a collection point for Lithium batteries and are currently working on a communication plan to inform residents and users of the Facility.</p> <p>Signage for waste disposal bays will be considered to limit the disposal of items that could cause a fire.</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:	Category 61A assessed capacity	Date(s) of non-compliance:	2023
Details of non-compliance:			
10,000 tonnes of e-waste was stored on site over the reporting period, exceeding the assessed capacity of 5,000 tonnes per annum.			
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.			
None			
Cause (or suspected cause) of non-compliance:			
Due to the significant distance to recycling premises (perth), recyclable materials need to be collected and stockpiled over longer periods to increase the transport efficiencies. (e.g. It takes approximately six months to collect a trailer load of E-waste for shipment to Total Green Recycling in Perth which works out to be cost effective for the TOPH.)			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The town will submit a licence amendment application in 2024 to increase the Category 61A assessed production capacity.			
Was this non-compliance previously reported to DWER?			
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:	33	Date(s) of non-compliance:	Listed below
Details of non-compliance:			
<p>Wastewater treatment plant effluent is required to be sampled in accordance with Table 7 of the Licence which requires quarterly sampling. Samples were not able to be obtained in the last 2 quarters of the reporting period due low water levels in the pond caused by extended periods of dry weather.</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 impact. Wastewater production ceased during this period.			
Cause (or suspected cause) of non-compliance:			
Weather conditions			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Nil			
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:	33, Table 7	Date(s) of non-compliance:	Listed below
Details of non-compliance:			
<p>Sample results exceeded limits listed under Table 7 of the EPL on three instances. E. coli levels were exceeded in January (100 CFU/100ml), March (11 CFU/100ml) and April (16 CFU/100ml). These results however were not representative of the quality of the wastewater used for dust suppression on the landfill site, with the E. coli count likely to be much lower and within threshold limits.</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 impact. Waste water was not used for dust suppression.			
Cause (or suspected cause) of non-compliance:			
<p>Historically, the monitoring reference point within the Landfill Recycled Water Quality Management Plan (RWQMP) was located on the final effluent tank where the treated water is stored, potentially for several days, leading to chlorine degradation and an increase in E. coli levels. However, there is an additional in-line chlorine dose in the feedpipe from the final effluent storage tank to the standpipe where treated water is collected for use as dust suppression. This additional dose increases chlorine levels in the wastewater, thereby reducing E. coli levels.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>As a result of the non-compliance the Town requested the Department of Health change the sample point within the RWQMP from the 'Final effluent tank' to the 'tank outlet to standpipe' to ensure the sample location was representative of the waste water intended for onsite dust suppression use. This approval was provided in August 2023. The location of the monitoring reference point M1 (Table 7 of the EPL) is not stipulated in the licence and has previously been assumed to align with the location approved by DOH within the RWQMP. Given the change in approved sample location, the Town will assume monitoring reference point M1 will be located at the 'tank outlet to standpipe' to align with the DOH approval. Wastewater samples will now be collected from this new sample location.</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:	44	Date(s) of non-compliance:	2023
Details of non-compliance:			
The 2022 AER does not contain assessment of the ambient groundwater quality against previous results and targets.			
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 suspected environmental impact with the non-compliance			
Cause (or suspected cause) of non-compliance:			
Lack of staff awareness and licence condition ambiguity (44) as to the requirements for reporting of groundwater monitoring results to DWER			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
TOPH staff will follow-up with DWER officers to ascertain the groundwater monitoring information required to be provided in the AER each year			
Was this non-compliance previously reported to DWER?			
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 particular ¹ . I/We consent to the Annual Audit Compliance Report being used on the Department of Water and Environmental Regulation's (DWER) website.			
Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		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.