



## 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](mailto: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:	L7308/1998/13	Licence file number:	2010/008321
Licence holder name:	A. Richards Pty Ltd		
Trading as:	Richgro		
ACN:	008 734 852		
Registered business address:	203 Acourt Road Jandakot WA 6164		
Reporting period:	01 / 01 / 2019 <b>to</b> 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)
<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 in 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
Schedule 1 of the Environmental Protection Regulations 1987 Cat. No. 61 = 25,000 tonnes / annum Cat. No. 61A = 75,000 tonnes / annum  Cat. No. 67A = 50,000 tonnes / annum	Cat. No. 61 = 7,284 tonnes / annum (Input) Cat. No. 61A = 40,299 tonnes / annum (Input)  Cat. No. 67A = 34,626 tonnes / annum (Produced)

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
<i>Not Applicable</i>	<i>Not Applicable</i>

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	Date(s) of non-compliance:	2019
Details of non-compliance:			
Location of the Green Waste Grinder.			
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			
Cause (or suspected cause) of non-compliance:			
Due to in-situ electrical requirements for the Electric Grinder the location of operating the grinder was not as per Condition 7 and Schedule One of L7308/1998/13			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Amendment application to DWER lodged in August 2019 for the amendment to the operating location of the Electric green waste grinder.			
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: 20 / 07 / <b>2018</b> and 26 / 08 / <b>2019</b>	

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 #16 (a) (b) (e)	Date(s) of non-compliance:	2019
Details of non-compliance:			
<p>Indoor Composting Management of windrows                      (a) regular turning;                      (b) temperature monitoring consecutive days and ;                      (e) mixing of digestate and green waste.</p> <p>Due to operational changes the above conditions were not applied to the indoor composting process.</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 were no actual or suspected environmental impacts.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Due to operational changes the regular turning of windrows was not required after the initial product mix (Cond.16(a)). Consecutive temperature monitoring was not required (Cond.16(b)). And the process flow and equipment designed required alteration for mixing of digestate and green waste (Cond.16(e)).</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Amendment application to DWER lodged in August 2019 for the amendment to Indoor Composting Management</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 22 / 11 / 2018	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 26 / 08 / 2019	

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 #20	Date(s) of non-compliance:	26 November 2019						
Details of non-compliance:									
<p>The Emissions Assessment Report conducted in November 2019 identified that the following emissions limits from the Generator Stacks were non-compliant.</p> <table border="0"> <tr> <td>Generator 1 Stack Emission</td> <td>Nitrogen NO<sub>x</sub> as NO<sub>2</sub></td> <td>Stack Flow Rate</td> </tr> <tr> <td>Generator 2 Stack Emission</td> <td>Nitrogen NO<sub>x</sub> as NO<sub>2</sub></td> <td>Stack Flow Rate</td> </tr> </table>				Generator 1 Stack Emission	Nitrogen NO <sub>x</sub> as NO <sub>2</sub>	Stack Flow Rate	Generator 2 Stack Emission	Nitrogen NO <sub>x</sub> as NO <sub>2</sub>	Stack Flow Rate
Generator 1 Stack Emission	Nitrogen NO <sub>x</sub> as NO <sub>2</sub>	Stack Flow Rate							
Generator 2 Stack Emission	Nitrogen NO <sub>x</sub> as NO <sub>2</sub>	Stack Flow Rate							
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 were no actual or suspected environmental impacts.            Both Generators are emitting emissions of Nitrogen NO<sub>x</sub> as NO<sub>2</sub> that are above the emission limit of 600mg/m<sup>3</sup>. This Emission was noted at a specific load capacity (run speed) of the Generator causing emission into the atmosphere.            Generator 1 - 50% load capacity (Nitrogen NO<sub>x</sub> as NO<sub>2</sub> Test #1/750 v's 600. Test #2/700 v's 600).            Generator 2 - 50% load capacity (Nitrogen NO<sub>x</sub> as NO<sub>2</sub> Test #1/640 v's 600. Test #2/660 v's 600).            Generator 1 – 50% load capacity (Stack Flow Rate Test #1 60 v's &gt;or=70, Test #2 60 v's &gt;or=70).            Generator 2 – 50% load capacity (Stack Flow Rate Test #1 65 v's &gt;or=70, Test #2 65 v's &gt;or=70).</p>									
Cause (or suspected cause) of non-compliance:									
The cause of the above emission level of Nitrogen NO <sub>x</sub> as NO <sub>2</sub> and stack flow rate for both generators is due to the reduced load capacity at the time of the emission test.									
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:									
<p>Due to operational fluctuation in load capacity and gas quantities the test results at a reduced load capacity will result in test results outside of the parameters.</p> <p>External consultants arranged for a 5 minute test at a higher load capacity of 80% and all parameters were compliant.</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:	Condition #33	Date(s) of non-compliance:	May 2018
Details of non-compliance:			
The Company confirms that the testing requirements for the parameters of table 9 were not completed by the specified completion date (Column 4 of Table 9).			
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.			
There were no actual or suspected environmental impacts			
Cause (or suspected cause) of non-compliance:			
Arrangements for Test Method #2/Ham and Baum 2009. Non-compliance due to the availability and timing of contractors in undertaking testing methodology for parameter Seepage Rate for all 4 ponds.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
There were no adverse effects of this non-compliance.			
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: 26 / 06 / 2018	

### Section F – Declaration

## Department of Water and Environmental Regulation

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:	Managing Director	Position:	
Date:	26 <sup>th</sup> February 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.