



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L7690/1997/6	Licence file number:	DER2014/001262
Licence holder:	Water Corporation		
Trading as:	Denham Wastewater Treatment Plant		
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">• 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
54	194 m ³ /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:	Approved premises production or design capacity. Condition 5.3.1 – N1 Notification	Date(s) of non-compliance:	FY2022-2023
Details of non-compliance: (INC-068753)			
<i>Approved premises production or design capacity: 256 cubic metres per day.</i>			
Total days over approved premises production or design capacity of 256m ³ /dat for FY2022-2023 is 58 days. Jul-22: 23 days Aug-22: 7 days Sep-22: 5 days Oct-22: 6 days Nov-22: 0 days Dec-22: 1 days Jan-23: 0 days Feb-23: 0 days Mar-23: 0 days Apr-23: 13 days May-23: 0 days Jun-23: 3 days			
<i>Condition/Table 5.3.1 – Notification requirements to notify CEO of breach of a licence limit.</i>			
No notification was submitted			
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.			
Ongoing operational non-compliances as a result of increased inflow to the plant. Increased inflow has a direct impact on pond and treatment capacity of the ponds and may lead to asset deficiencies such as, erosion, loss of freeboard, potential liner integrity issues.			
Cause (or suspected cause) of non-compliance:			
Increase inflow into the plant. Root cause of the increased inflow is yet to be determined. May be as a result of increased population, illegal connections to sewer network or stormwater/groundwater ingress into the conveyance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Investigations into the root cause of the increased inflow will occur in FY2023-2024.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing (N1 Form)		Date:	

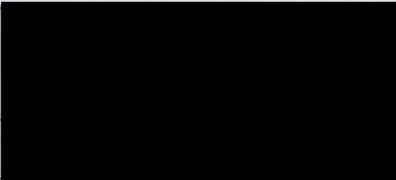
Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.5 (b)	Date(s) of non-compliance:	17/03/2023
Details of non-compliance: (INC-068753)			
<p><i>Condition 1.3.5 (e) states that The Licensee shall manage all wastewater treatment, and infiltration ponds such that:</i></p> <p><i>(b) a freeboard at or greater than 400mm is targeted;</i></p> <p>Outlet pipe to Pond 2 and has come loose from its mooring and lifted resulting in no flow from Pond 1 to Pond 2, causing Pond 1 to lose freeboard.</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>No environmental impact from this non-compliance. No overflow or discharge occurred as a result of this non-compliance</p>			
Cause (or suspected cause) of non-compliance:			
The anchor for the outlet pipe broke resulting in the pipe lifting and preventing flow to Pond 2.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Temporary pumps were set up to pump wastewater from Pond 1 to Pond 2. Pond levels are in the process of being managed.</p> <p>Bypass pipework requires installation, and the pond requires desludging to allow for repairs of the outlet pipe.</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 (N1 Form)		Date: 29/03/2023	

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:	Cond.3.5.1/Table 3.5.1	Date(s) of non-compliance:	30/06/2023
Details of non-compliance: (INC-070464)			
<p><i>Condition 3.5.1/Table 3.5.1 requires quarterly spot samples to be taken at emission point L1 and L2_Final Effluent Monitoring Location (S4000122).</i></p> <p>Although flow was recorded in May and June 2023 no representative sample was taken for Q4 samples.</p> <p>It was investigated that samples were:</p> <ul style="list-style-type: none"> • not taken in May 2023 and were marked off as sample point dry • not rescheduled on the grid for June 2023, no samples were taken • no samples taken in July 23. 			
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>No environmental impact has been observed from this non-compliance.</p> <p>Any suspected impact or trends will be observed in Q1 2023-2024</p>			
Cause (or suspected cause) of non-compliance:			
<p>No flows were detected between December 2022 and April 2023 therefore sample point was detected as dry.</p> <p>Technical advisor did not reschedule monitoring within the quarterly period</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
To provide scrutiny over automated water quality sampling system alerts and review data and actions monthly.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing (N1 Form)		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:	1.3.5 (c)	Date(s) of non-compliance:	31/05/2021
Details of non-compliance: (INC-063774)			
<p><i>Condition 1.3.5 (c) states that The Licensee shall manage all wastewater treatment, and infiltration ponds such that:</i></p> <p><i>(c) Integrity of containment infrastructure is maintained.</i></p> <p>Erosion is evident on the pond embankments (identified during an internal audit). A review of the groundwater monitoring data has also shown an increase in Total Nitrogen (TN) in Bores 1/98, 2/98 and 4/98 from approximately 2015/2016 onwards. <i>E. coli</i> in groundwater is not sampled as part of the licence however consultant samples conducted in November 2020 in bore 4/98 report concentration comparable to influent.</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>It is suspected that the treatment ponds at Denham WWTP are leaking and impacting the groundwater in the vicinity of the plant. Additionally, native vegetation dependent on the groundwater in the vicinity may be impacted by the increase nutrient levels in the groundwater.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Increased rain in the region may have resulted in some erosion. Additionally, it was determined that earthquakes in the region in December 2018 and February 2019 may have impacted the integrity of the liner. Some tears were noticed in the above effluent line of Pond 3 and these were repaired in early 2020. Below the effluent line was not investigated for further tears in the liner.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A 12-month seepage investigation is underway to determine if and extent of pond seepage. Total Nitrogen in Bore 4/98 has been on an increasing trend since mid 2022. It is anticipated that this will be completed in October 2023 and the results will decide on further action including liner repairs if required.</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: 01/09/2021	

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:	1.3.5 (e)	Date(s) of non-compliance:	31/05/2021
Details of non-compliance: (INC-063425)			
<p><i>Condition 1.3.5 (e) states that The Licensee shall manage all wastewater treatment, and infiltration ponds such that:</i></p> <p><i>(e) Vegetation and floating debris (emergent or otherwise) is prevented from encroaching onto pond surfaces or inner pond embankments.</i></p> <p>An internal audit recorded a large volume of floating debris on Pond 1.</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>No environmental impact from this non-compliance.</p> <p>Odour impacts may occur as a result of floating sludge, however sensitive receptors are more than one kilometer to the south west.</p>			
Cause (or suspected cause) of non-compliance:			
<p>This non-compliance may have been caused lack of aeration in the ponds, particularly in the cooler months when wind movement on the ponds decreases, and a build of sludge. Additionally, it has been determined that this pond is of insufficient depth to allow 1m of 'clear water' above sludge blanket.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Triggers for desludging have not been met but desludging is prioritized at this site to assist with resolving issue. Additionally, investigations are underway to determine if the pond depth can be increased to allow sufficient clear water column.</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: 01/09/2021	

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 ¹ . 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:	General Manager Operations Group	Position:	
Date:	26 SEPT 2023	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.