



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L8925/2015/1	Licence file number:	DER2015/002254
Licence holder:	Water Corporation		
Trading as:	Laverton 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)

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	Inflow 92 m ³ /day
61	18,769 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
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:	01/12/22
Details of non-compliance:			
<p>In accordance with licence condition 1.3.2 and table 1.3.1 <i>the licensee shall only allow waste to be accepted onto the premises as per able 1.3.1.</i></p> <p>D300 non-toxic salts are only to be accepted via tanker to the evaporation pond in emergency situations with a quantity limit of 10,000 tonnes per year. As a result of the long-term incident for Laverton Nitrates and continuity of supply, brine production at the Laverton WTP has increased resulting in an increasing load of controlled waste product, D300 non-toxic salts.</p> <p>18,769 tonnes of D300 non-toxic salts was tankered to the wastewater treatment plant (WWTP) in 2022-23.</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>Initially the non-compliance was administrative in nature with no direct negative impact to environmental receptors. Increased acceptance of D300 non-toxic salts deposited into the Evaporation Pond has attributed to pond seepage. In anticipation of an overflow to the environment, the Corporation undertook a baseline vegetation condition assessment and soil sampling to determine, post discharge, if an impact could be measured. Ongoing inspections of the overflow area will occur in the coming months and if an impact is determined, notification to pollution watch will be submitted.</p>			
Cause (or suspected cause) of non-compliance:			
<p>A result of high nitrates incident at the Laverton WTP and the need for a continuity of drinking water supply, increased brine production at the WTP with limited capacity in the evaporation ponds meant that the WWTP needed to be utilised for emergency storage.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Disposal of brine at the WWTP was a contingency plan only used when all other options had been exhausted.</p> <p>The following actions were taken to mitigate adverse impacts of the non-compliance:</p> <ul style="list-style-type: none"> • Pre-discharge baseline vegetation condition assessment; • Soil sampling; • Water quality sampling • Traditional owner consultation and site inspection. • Delivery and placement of rocks at the spillway to prevent erosion. <p>The following actions were taken to prevent the licence exceedance:</p> <ul style="list-style-type: none"> • Continual optimisation of evaporation pond storage at the WTP • Removal of the Shire from Laverton supply, thereby reducing production; • Removal of private operators from the scheme, thereby reducing production; 			

<ul style="list-style-type: none"> • Construction of a new emergency temporary evaporation pond at the WTP • Investment into spray evaporators at the WTP • Investment into the construction of temporary tanks at the WTP • Investment into vegetation investigation to support the construction of a new pond at the WWTP • Investigation into spray irrigators at the WTP and WWTP • Investigation into carting waste to Kalgoorlie • Investigation into carting waste to Leonora • Investigation of all Part V licences on DWER's website I the vicinity of Laverton WTP with the ability to accept Cat.61 D300 waste. • Investigation into the ability to sell the waste as a product to business and to support business to obtain necessary licences. 	
Was this non-compliance previously reported to DWER? No	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 08 /12 /2022
<input checked="" type="checkbox"/> Reported to DWER in writing	

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:	31/01/2023
Details of non-compliance:			
<p>In accordance with licence condition 1.3.5 (c) <i>there is no discernible seepage loss from the wastewater and liquid waste treatment ponds.</i></p> <p>As a result of the long-term incident for Laverton Nitrates and continuity of supply, brine production at the Laverton WTP increased resulting in the capacity exceedance of controlled waste product, D300 non-toxic salts at the WWTP.</p> <p>Discernible seepage was noticed on the pond banks of evaporation pond (Pond 4) when the freeboard was less then 300mm.</p> <p>Seepage was previously recorded in 2017 and work was carried out to capture and contain seepage with a subsoil drain. These drains were still working as intended.</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>Seepage was contained within the boundary of the WWTP with limited environmental impact, there are no sensitive environmental receptors in the area.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Laverton nitrate incident causing additional production of D300 with limited capacity in evaporation ponds at the WTP. Protracted negotiations between stakeholders to enter into a ILUA, construction approvals of additional evaporation ponds meant that pond 4 was being utilised. Miscommunication with the carting contractor led to pond 4 being overfilled.</p>			

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Carting to pond 4 was ceased when seepage was identified.	
An integrity assessment was undertaken of pond 4 and determined a safe level that the ponds could be operated without seepage.	
Treatment pond 3 was identified for additional storage and isolated to receive waste. Following the assessment, a contingency plan was developed to balance all pond levels while construction of the temporary evaporation pond was being finalised.	
Was this non-compliance previously reported to DWER? No	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: 06/07/2023
<input checked="" type="checkbox"/> Reported to DWER in writing	

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:	18/05/2023
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Details of non-compliance:

In accordance with licence condition 1.3.5 (c) *there is no discernible seepage loss from the wastewater and liquid waste treatment ponds.*

As a result of the long-term incident for Laverton Nitrates and continuity of supply, brine production at the Laverton WTP increased resulting in the capacity exceedance of controlled waste product, D300 non-toxic salts at the WWTP.

Erosion and discernible seepage was noticed on the pond banks of Treatment Pond 3 when the freeboard was less than 300mm.

Seepage was previously recorded in 2017 and work was carried out to capture and contain seepage with a subsoil drain. These drains were still working as intended.

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.

Seepage was contained within the boundary of the WWTP with limited environmental impact.

If left, the integrity of the ponds and bank stability may be compromised and may result in reduced capacity to treat wastewater and/or the failure of infrastructure.

Cause (or suspected cause) of non-compliance:

Laverton nitrate incident causing additional production of D300 with limited capacity in evaporation ponds at the WTP. Protracted negotiations between stakeholders to enter into a ILUA, construction approvals of additional evaporation ponds meant that pond 3 was required for storage.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Carting to pond 3 was ceased initially and we were able to utilise the available freeboard on pond 4 while the situation was assessed. Once all contingencies had been exhausted the decision was made to manually discharge to the environment in order to keep the integrity of the asset.	
Was this non-compliance previously reported to DWER? No	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: 06/07/2023
<input checked="" type="checkbox"/> Reported to DWER in writing	

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:	24/03/23
Details of non-compliance:			
<p>In accordance with licence condition 1.3.3 <i>The Licensee shall ensure that the wastes accepted onto the Premises are only subjected to the process(es) set out in Table 1.3.2 and in accordance with any process requirements described in that table.</i></p> <p>As a result of the long term incident for Laverton Nitrates and continuity of supply brine production at the Laverton WTP has increased resulting in an increasing load of controlled waste product, D300 non toxic salts.</p> <p>Inability to dispose of waste at Laverton WTP evaporation ponds due to limited capacity, carting to WWTP is being used as a contingency option. Due to limited capacity issues, construction delays with the temporary evaporation pond and trying to avoid environmental discharge, decision was made to use Pond 3 as storage for D300 following the seepage observed at pond 4 and the need to reduce pond levels.</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>Initially the non-compliance was administrative in nature with no direct negative impact to environmental receptors determined while it was contained to pond 3. However, increased inflow of wastewater into the WWTP have led to capacity issues and given Treatment pond 3 has been used for the storage of D300 non-toxic salts this has resulted in the premature discharge of secondary treated wastewater.</p> <p>It should be noted that the WWTP only treats wastewater to a secondary standard and there would be little difference in water quality between Treatment Pond 2 and treated wastewater stored in Treatment Pond 3, prior to discharge.</p>			
Cause (or suspected cause) of non-compliance:			
As a result of the long term incident for Laverton Nitrates and continuity of supply brine production at the Laverton WTP has increased resulting in an increasing load of controlled waste product, D300 non toxic salts. Pond 3 was used for D300 to prolong the inevitability of having to			

discharge D300 to the environment	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>The following actions were taken to exhaust all other options and prevent licence non-compliances:</p> <ul style="list-style-type: none"> • Continual optimisation of evaporation pond storage at the WTP • Removal of the Shire from Laverton supply, thereby reducing production; • Removal of private operators from the scheme, thereby reducing production; • Construction of a new emergency temporary evaporation pond at the WTP • Investment into spray evaporators at the WTP • Investment into the construction of temporary tanks at the WTP • Investment into vegetation investigation to support the construction of a new pond at the WWTP • Investigation into spray irrigators at the WTP and WWTP • Investigation into carting waste to Kalgoorlie • Investigation into carting waste to Leonora • Investigation of all Part V licences on DWER's website the vicinity of Laverton WTP with the ability to accept Cat.61 D300 waste. • Investigation into the ability to sell the waste as a product to business and to support business to obtain necessary licences. 	
Was this non-compliance previously reported to DWER? No	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: 06/07/2023
<input checked="" type="checkbox"/> Reported to DWER in writing	

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:	2.1	Date(s) of non-compliance:	02/06/2023
Details of non-compliance:			
<p>In accordance with licence condition 2.1 and 2.1.1 <i>The Licensee shall ensure that where waste is emitted to land from the emission points in Table 2.1.1 (and identified on the map of emission points in Schedule 1) it is done so in accordance with the conditions of the licence.</i></p> <p>Non-compliance with the “description” (type) of discharge permitted to land and when inflow was below 70 kL/day</p> <p>The Corporation discharged D300 non-toxic salts to the environment from Treatment Pond 3, emission point reference (S6001050). This condition only permits the discharge of treated wastewater from Treatment Pond 3.</p> <p>In addition, and to lessen the impact of pond seepage (see Condition 1.3.3 above) D300 non-toxic salts was manually pumped through the discharge channel flume to capture flow data as well as appropriate sampling.</p>			

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<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>	
<p>Discharge occurred in the existing wastewater discharge channel.</p> <p>In anticipation of an overflow to the environment, the Corporation undertook a baseline vegetation condition assessment and soil sampling to determine, post discharge, if an impact could be measured. Ongoing inspections of the overflow area will occur in the coming months and if an impact is determined, notification to pollution watch will be submitted.</p>	
<p>Cause (or suspected cause) of non-compliance:</p>	
<p>As a result of the long term incident for Laverton Nitrates and continuity of supply brine production at the Laverton WTP has increased resulting in an increasing load of controlled waste product, D300 non-toxic salts.</p>	
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>	
<p>The following actions were taken to mitigate adverse impacts of the discharge and non-compliance:</p> <ul style="list-style-type: none"> • Pre-discharge baseline vegetation condition assessment; • Soil sampling; • Water quality sampling • Traditional owner consultation and site inspection. • Delivery and placement of rocks at the spillway to prevent erosion. <p>The following actions were taken to prevent the licence exceedance:</p> <ul style="list-style-type: none"> • Continual optimisation of evaporation pond storage at the WTP • Removal of the Shire from Laverton supply, thereby reducing production; • Removal of private operators from the scheme, thereby reducing production; • Construction of a new emergency temporary evaporation pond at the WTP • Investment into spray evaporators at the WTP • Investment into the construction of temporary tanks at the WTP • Investment into vegetation investigation to support the construction of a new pond at the WWTP • Investigation into spray irrigators at the WTP and WWTP • Investigation into carting waste to Kalgoorlie • Investigation into carting waste to Leonora • Investigation of all Part V licences on DWER's website in the vicinity of Laverton WTP with the ability to accept Cat.61 D300 waste. • Investigation into the ability to sell the waste as a product to business and to support business to obtain necessary licences. 	
<p>Was this non-compliance previously reported to DWER? No</p>	
<p><input checked="" type="checkbox"/> Yes, and</p>	
<p><input type="checkbox"/> Reported to DWER verbally</p>	<p>Date: 06/07/2023</p>
<p><input checked="" type="checkbox"/> Reported to DWER in writing</p>	

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.