



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L5961/1991/12	Licence file number:	DER2014/001269
Licence holder:	Water Corporation		
Trading as:	Geraldton No.2 Wastewater Treatment Plant		
ABN:	28 003 434 917		
Registered address:	629 Newcastle Street, LEEDERVILLE, WA 6007		
Reporting period:	01 / 07 / 2020 to 30 / 06 / 2021		

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	Inflow 1,995m 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:	3.4.1	Date(s) of non-compliance:	17/03/2021
Details of non-compliance:			
Condition 3.4.1 The licensee shall undertake the monitoring in Table 3.4.1 according to the specifications in that table and record and investigate results that do not meet limit specified. pH limit 6.5-8.5.			
Sampling undertaken on the 10 March 2021, for Bore 1/17, returned a pH result of 9.47.			
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.			
There is no environmental impact, as the probable cause of the anomalous sample is sampling error.			
Cause (or suspected cause) of non-compliance:			
A bailer is often used to take samples when a submersible pump is not available (which was the case) so a change in sampling methodology is likely the cause for the exceedance. Monitoring of pH for the remainder of the reporting period showed no further exceedances or unusual trends indicating ongoing issues.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Laboratory re-sampling of the pH in Bore 1/17 was undertaken and on the 25 th March 2021 returned a compliant result. An N1 form was submitted to DWER when the non-compliance was detected.			
Was this non-compliance previously reported to DER?			
<input checked="" type="checkbox"/> Yes, and <input type="checkbox"/> No			
<input type="checkbox"/> Reported to DER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DER in writing		Date: 18 / 03 / 21	

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:	3.4.1	Date(s) of non-compliance:	13 April 2021
Details of non-compliance:			
Condition 3.4.1 requires samples monthly groundwater sampling for pathogens and pH. During the incident response to TC Seroja, sampler error lead to a duplication of samples. The time between learning about the duplication of samples from the lab and the next round of monthly pathogen and pH test was too short to be able resample within the timeframes of License Condition 3.1.2.			
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 impact			
Cause (or suspected cause) of non-compliance:			
TC Seroja cause major disruption to power and communications networks throughout the Mid-West Region. Incident response re-prioritised field staff with additional urgent duties. During this time monthly sampling was conducted over multiple days leading to sampling error and duplication of samples.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Water Corporation sample data was interpolated from averages throughout the reporting year.			
Was this non-compliance previously reported to DER?			
<input type="checkbox"/> Yes, and		<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Reported to DER verbally		Date: / /	
<input type="checkbox"/> Reported to DER 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:	3.4.1	Date(s) of non-compliance:	12 May 2021
Details of non-compliance:			
Condition 3.4.1 requires samples monthly groundwater sampling for pathogens, nutrients and physicochemical. Missed Samples: Bore 5/94 – nutrients, pathogens and physicochemical Bore10/94 - pathogens			
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 impact			
Cause (or suspected cause) of non-compliance:			
Bore 10/94 contains minimal water therefore a sample could not be taken. A bent bore casing prevents the sampling bailer from being able to take a sample from bore 5/94. The time lapsed between reporting the missed samples, ability to correct issues, and the next round of six-monthly sampling was too short to resample within the timeframes of License Condition 3.1.2.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An ADR to redrill both bores and is awaiting funding to proceed. Sample data was interpolated from averages throughout the reporting year.			
Was this non-compliance previously reported to DER?			
<input type="checkbox"/> Yes, and <input checked="" type="checkbox"/> No			
<input type="checkbox"/> Reported to DER verbally		Date: / /	
<input type="checkbox"/> Reported to DER 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:	3.4.6, 3.4.7, 3.4.8	Date(s) of non-compliance:	18/06/2021
Details of non-compliance:			
<p>These non-compliances were identified through an internal audit. Three (3) conditions relate to the submission of a triennial review of the ambient groundwater monitoring data to validate the 'Rockwater Report 2010' modelling data, as submitted for the new infiltration ponds. Report due 25 February 2020.</p> <p>The validation report was not submitted to DWER by the 25th February 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> <p>There is no observed environmental impact.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Whilst developing the review of the groundwater model to validate the Rockwater Report 2010, data gaps were identified which prevented the modeling and review from being accurate. As such no report was submitted until these data gaps could be closed out.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Upon learning about these data gaps the decision was made to expand the groundwater monitoring program. Concurrently, a Contaminated Sites Investigation (CSI) is ongoing on site. Once the CSI is complete. Water Corporation will determine if the information from the CSI and the groundwater monitoring is sufficient or if an extension on the groundwater monitoring program is required. Water Corporation will provide DWER with an update in October 2021 of the next steps and timelines.</p>			
Was this non-compliance previously reported to DER?			
<input type="checkbox"/> Yes, and		<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Reported to DER verbally	Date: / /		
<input type="checkbox"/> Reported to DER 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:	4.1.1_Table 4.1.1	Date(s) of non-compliance:	18/06/2021
Details of non-compliance:			
IR2 – Required a report to DWER confirming actions in IR1 'nutrient management strategy' which have been completed and the outcomes of those actions. Report due 31 June 2018.			
No evidence has been located to confirm compliance with this condition.			
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.			
There is no environmental impact.			
Cause (or suspected cause) of non-compliance:			
Data gaps were identified during the development of the reports to confirm the Improvement Program actions and a decision was made expand monitoring program to determine if the Contaminated Sites Investigation (CSI) would provide adequate information to submit reports			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A Contaminated Sites Investigation (CSI) is currently underway with an expected completion of September 2021. On completion of the CSI Water Corporation will review data to determine if further investigation is required. Water Corporation will provide an update to DWER in October 2021 with next steps and timelines.			
Was this non-compliance previously reported to DER?			
<input type="checkbox"/> Yes, and		<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Reported to DER verbally		Date: / /	
<input type="checkbox"/> Reported to DER 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:	1.2.6	Date(s) of non-compliance:	18/06/2021
Details of non-compliance:			
An internal audit against corporate records revealed that the Construction Compliance Document has not been submitted to DWER for the Geraldton No. 2 WWTP Infiltration ponds upgrade.			
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.			
There is no observed environmental impact.			
Cause (or suspected cause) of non-compliance:			
The cause of the non-compliance was an administrative oversight.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Construction Compliance Report will be prepared and submitted to DWER as soon as possible, addressing works specifications specified in Condition 1.2.4 and Table 1.2.1.			
Was this non-compliance previously reported to DER?			
<input type="checkbox"/> Yes, and		<input checked="" type="checkbox"/> No	
<input type="checkbox"/> Reported to DER verbally	Date: / /		
<input type="checkbox"/> Reported to DER 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 Environment Regulation’s (DER) 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.