



## 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 / 2023 to 30 / 06 / 2024		

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 at 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.	
<b>Prescribed Premises Category</b>	<b>Actual Production Quantity</b>
54	Inflow 1,830 m <sup>3</sup> /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.	
<b>Prescribed Premises Category</b>	<b>Actual Part 2 Waste Discharge Quantity</b>
Not Applicable	

Section E – Details of Non-Compliance with Licence Condition			
Condition no:	5 (Table 3)	Date(s) of non-compliance:	08/03/2019 & 01/05/2024
Details of non-compliance:			
<p><i>Condition 5 (Table 3) The licence holder must ensure that wastewater and sewage sludge is only stored and/or treated within vessels or compounds provided with the infrastructure detailed in Table 3. Inlet Works - Stored in a sealed bin which is surrounded by a bunded hardstand area which returns sludge leachate to the start of the treatment process.</i></p> <p>On environmental inspection it was determined that the bin did not meet the requirements specified by the licence. Although the bin is partially sealed by a shade cloth it is not classified as sealed. Non-compliance was initially raised in 2019, however, incident was incorrectly closed out and was not picked up in subsequent years.</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>			
No impact has been detected. However, there is an increased risk of rags escaping containment.			
Cause (or suspected cause) of non-compliance:			
Contractor currently does not provide an adequate bin for storage of screenings.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Investigations are underway to procure a new bin that meets the requirements of the licence.			
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: 29 /08 /2019	

Section E – Details of Non-Compliance with Licence Condition			
Condition no:	3 (c) (Table 1)	Date(s) of non-compliance:	25/02/2024
Details of non-compliance:			
<p><i>Condition 3 (c) (Table 1) The Licence Holder must only allow waste to be accepted on to the Premises if:</i></p> <p><i>(c) it meets any specification listed in Table 1.</i></p> <p>6 kL of K130 was tankered and discharged into Geraldton No.2 WRRF over the reporting period.</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>			
No environmental impact has been suspected.			
Cause (or suspected cause) of non-compliance:			
Confusion around which wastewater treatment plants were allowed to accept Water Corporations reticulated sewer waste via tankering.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A licence amendment will be sought to bring licence in line with other premises where practice is allowable under conditions.			
Was this non-compliance previously reported to DER?			
<input type="checkbox"/> Yes, and		<input checked="" type="checkbox"/> No	
Reported to DER verbally		Date:    /    /	
<input checked="" type="checkbox"/> Reported to DER in writing		Date: 01 /10 /2024	

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:	13 (Table 5)	Date(s) of non-compliance:	30/06/2024
Details of non-compliance:			
<p><i>Condition 13 (Table 5) The Licensee shall undertake the monitoring in Table 5 according to the specifications in that table.</i></p> <p>Final effluent sample for June 2024 missed for both Nitrate and Nitrite.</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>No environmental impact I suspected from this non-compliance.</p>			
Cause (or suspected cause) of non-compliance:			
Sample was missed due to sampling program error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Issue has been rectified for next round of sampling,			
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 checked="" type="checkbox"/> Reported to DER in writing		Date: 01/10/2024	

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:	13 (Table 5)	Date(s) of non-compliance:	13/09/2023, 14/02/2024 & 17/06/2024
Details of non-compliance:			
<i>Condition 13 (Table 5) The Licensee shall undertake the monitoring in Table 5 according to the specifications in that table. E. coli limit of 1,000 cfu/100ml.</i>			
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 has been detected from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
It is suspected that the samples were contaminated, as historical samples at these sites for the past 6 months have returned results below the limit, with the majority of readings <10 cfu/100ml.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Resamples were undertaken and all results came back below the licensed limit. Awareness sessions were held with the samplers to advise of recent results and ensure correct sample procedures are followed.			
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: 05/04/2024, 18/09/2024	

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:	13 (Table 5)	Date(s) of non-compliance:	13/09/2024 & 03/04/2024
Details of non-compliance:			
<p><i>Condition 13 (Table 5) The Licensee shall undertake the monitoring in Table 5 according to the specifications in that table. Total Phosphorus limit 12mg/L</i></p> <p>The final effluent samples taken on 13/09/2023 and 03/04/2024 were 13 mg/L and 19 mg/L respectively.</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>			
No environmental impact has been detected from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Suspected that a reduction in aeration due to faulty aerators and higher level of total phosphorus within incoming sewer waste above the allowable limit is contributing to the higher level of Total Phosphorus at the discharge point.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Resample for both came back in the allowable range.			
An amendment will be sought to access the need for this requirement as the WRRF is not designed treat phosphorus levels.			
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 (N1)		Date: 05/04/2024	





## 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:	16, 17 & 18	Date(s) of non-compliance:	18/06/2021
---------------	-------------	----------------------------	------------

Details of non-compliance:

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.

The validation report was not submitted to DWER by the 25<sup>th</sup> February 2020.

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 actual or suspected environmental impact of the non-compliance.

Cause (or suspected cause) of non-compliance:

The validation report was not submitted due to the ongoing nature of contaminated sites investigations which were necessary to expand the ambient groundwater quality network.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Contaminated sites investigations have been undertaken between 2020-2024 which have expanded the ambient groundwater monitoring network and improved the quantitative assessment of ambient groundwater quality.

Water Corporation intends to submit a licence amendment to bolster the ambient groundwater quality monitoring program. This will allow for improved ongoing assessment of emissions from the infiltration ponds and negate validation of historical modelling data.

Was this non-compliance previously reported to DER?

☒ Yes, and ☐ No

☐ Reported to DER verbally

Date: / /

☒ Reported to DER in writing (2022-2023 AACR)

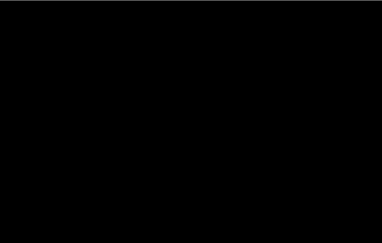
Date: 1 / 09 / 2023

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:	25 (Table 10)	Date(s) of non-compliance:	13/09/2024
Details of non-compliance:			
<p><i>Condition 25 (Table 10) The licence holder must ensure that the parameters listed in Table 10 are notified to the CEO in accordance with the notification requirements of the table.</i></p> <p>DWER not notified of Total Phosphorus exceedance on 13/09/2024 in correct timeframe. Incident was picked up on 05/04/2024 and not notified until 17/06/2024.</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>			
No environmental impact I suspected from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Late detection was caused by an error in the data system where only the monthly average of samples was displayed and was not picked up until review of data on 05/04/2024 for another breach. Changeover of staff caused confusion on if N1 had been submitted with other exceedance that occurred.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Internal procedure for N1 submission has been refined and staff have been given further training.			
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 (N1)		Date: 17/06/2024	



## 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<sup>1</sup>. I/We consent to the Annual Audit Compliance Report being published on the Department of Environment Regulation's (DER) website.

Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	24/09/2024	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.