



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 / 2021 to 30 / 06 / 2022		

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 1,992 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:	3.4.1	Date(s) of non-compliance:	12 May 2021
Details of non-compliance:			
Condition 3.4.1 requires 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.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Redrilling/ redevelopment of the bores was conducted in July 2022 with sampling to recommence during the 2022-2023 financial year.			
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 (2020-2021 AACR)		Date: 1 / 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:	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>			
There is no observed environmental impact.			
Cause (or suspected cause) of non-compliance:			
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.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Upon learning about these data gaps the decision was made to expand the groundwater monitoring program. Water Corporation aimed to address data gaps through the ongoing Contaminated Sites Investigation (CSI) on site. A recently received report from an Environmental Consultant company identified further investigations are required to address these data gaps, more information will be provided in the 2022-2023 reporting year.			
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 (2020-2021 AACR)		Date: 1 / 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:	4.1.1_Table 4.1.1	Date(s) of non-compliance:	18/06/2021
Details of non-compliance:			
<p>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.</p> <p>No evidence has been located to confirm compliance with this condition.</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>			
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:			
Water Corporation aimed to address data gaps through the ongoing Contaminated Sites Investigation (CSI) on site. A recently received report from an Environmental Consultant company identified further investigations are required to address these data gaps, more information will be provided in the 2022-2023 reporting year.			
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 (2020-2021 AACR)		Date: 1 / 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:	1.2.6	Date(s) of non-compliance:	18/06/2021
Details of non-compliance:			
An internal audit against corporate records revealed that the Construction Compliance Document had 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 was submitted to DWER on the 8 th October 2021.			
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 (2020-2021 AACR)		Date: 1 / 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:	3.4.1	Date(s) of non-compliance:	15/11/2021
Details of non-compliance:			
<p>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. E. Coli limit <1,000 cfu/100mL.</p> <p>E. Coli sample from 10/11/2021 for Bore 10/94 returned as >24,000 cfu/100mL. Follow-up samples for E. Coli in Bore 10/94</p> <ul style="list-style-type: none"> - 24/11/2021 13,000 cfu/100mL - 09/12/2021 2,100 cfu/ 100mL <p>Routine samples for E. coli in Bore 10/94</p> <ul style="list-style-type: none"> - 12/01/2022 <10cfu/100mL - 15/02/2022 <10cfu/100mL 			
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>			
There is no observed environmental impact from this non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>Samples taken on the 10/11/2021 and 24/11/2021 were taken using a bailer as the water levels in the bore were too low to use a submersible pump. For these two samples, the standard three casing lengths of water were unable to be pumped from the bore prior to sampling.</p> <p>A submersible pump was used for the samples on the 9/12/2021, 12/01/2022 and 15/02/2022, allowing three casing lengths of water to be pumped out of the bore prior to sampling.</p> <p>Seasonal fluctuations in groundwater levels are considered to have been the cause of the lower water level in the bore, preventing the use of a submersible pump. The samples taken with the bailer are unrepresentative of the water quality in the aquifer at the time of the sampling</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
This bore was redrilled in the week of the 27 th June. If licence limit exceedances continue to occur in this bore following re-drilling, a long-term plan will be developed to resolve the non-compliance.			
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: 16 / 11 / 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:	1.3.2 & 1.3.3	Date(s) of non-compliance:	25/02/2022
Details of non-compliance:			
<p><i>Condition 1.3.2 states:</i> <i>The Licensee shall only allow waste to be accepted on to the Premises if:</i> <i>(a) it is of a type listed in Table 1.3.1;</i> <i>(b) the quantity accepted is below any limit listed in Table 1.3.1; and</i> <i>(c) it meets any specification listed in Table 1.3.1</i></p> <p><i>Condition 1.3.3 states:</i> <i>The Licensee shall ensure that the wastes accepted onto the Premises are only subjected to the process(es)</i> <i>set out in Table 1.3.2 and in accordance with any process limits described in that table.</i></p> <p>An unlicensed pit was being used to dispose of wastewater sucked from wet wells, as part of routine maintenance, where the wastewater was known or suspected to have high fat/ rag loads. Rather than disposing into the primary pond via the tanker receival point, operationally the decision was made to dispose into this pit on an ongoing basis to prevent maintenance issues and sludge build up in the primary pond. The wastewater was disposed of in this pit and the rags/ fat were allowed to dry before removal to a licenced landfill facility. It was identified that the pit did not have sufficient lining on the base to prevent leachate to groundwater.</p> <p>The pit first appeared on historical aerial imagery in the 2001 and was used as a sludge drying bed.</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 the potential of some level of groundwater contamination due to this practice.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Failure to adequately decommission an asset once it had been deemed redundant is the suspected cause of the incident. Operational Staff assumed that the presence and signage on the pit meant that it was licensed for use. It is suspected that following upgrades in 2015 with a compliant sludge drying bed, this pit was deemed no longer necessary however was not decommissioned appropriately.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Disposal of wastewater into this pit was ceased immediately. A plan was made to remove existing solid material in the pit to a licensed landfill facility.</p> <p>Planning is underway to retrofit the pit to adequately contain and return leachate to primary pond. A licence amendment will be requested from DWER to ensure the pit is an acceptable storage/ drying area for the material, prior to disposal at a landfill facility.</p> <p>The ongoing Contaminated Sites Investigation has identified the pit as a potential emission source and assessment will take place into the potential impacts of the historical use of the pit.</p>			

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 notification)	Date: 4 /03 / 2022

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.