



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

| | | | |
|---------------------|--|----------------------|-------------|
| Licence number: | L5989/1991/11 | Licence file number: | 2010/002537 |
| Licence holder: | Water Corporation | | |
| Trading as: | Northam Wastewater Treatment Plant | | |
| ABN: | 28 003 434 917 | | |
| Registered address: | 629 Newcastle Street, LEEDERVILLE, WA 6007 | | |
| Reporting period: | 01 / 07 / 2019 to 30 / 06 / 2020 | | |

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 1486m 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: | 4(c) | Date(s) of non-compliance: | 18/03/20 |
|---------------|------|----------------------------|----------|

Details of non-compliance:

When Secondary Treatment Pond 2 was taken offline and drained for de-sludging works in November 2019, at the time it was observed that the pond floor was undulating with evidence of hard material (possibly cemented lateritic gravel) exposed in several locations and damp areas were observed in the north-western portion of the pond floor. A geotechnical engineering assessment was completed on 18 March 2020 by Water Corporation, which concluded that it is likely that the clay liner has been compromised where the affected damp areas have been observed.

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.

The Northam WWTP is not within a Bush Forever Site or classified as an Environmentally Sensitive Area. As part of the incident investigation, Water Corporation undertook a targeted soil assessment for the northern portion of Secondary Treatment Pond 2. The findings of this assessment demonstrated that all samples were below the adopted assessment criteria with the exception of concentrations of copper for two samples (95mg/kg and 85mg/kg), which exceeded the specific Ecological Investigation Level criteria of 70mg/kg. To decrease the residual risk and mitigate potential environmental and human health impacts, relining of the affected portion of Secondary Treatment Pond 2 was proposed and completed. Due to low flows in the Avon River (nearest sensitive receptor) since October 2019, no upstream or downstream surface sampling was able to be taken. However, in stream monitoring data obtained prior to the event indicated that there had been no adverse trends. Data remained consistent and generally within historical ranges. Additional monitoring data and analysis will be provided in the 2019-2020 Annual Environmental Report.



Figure 1. Aerial of Northam WWTP

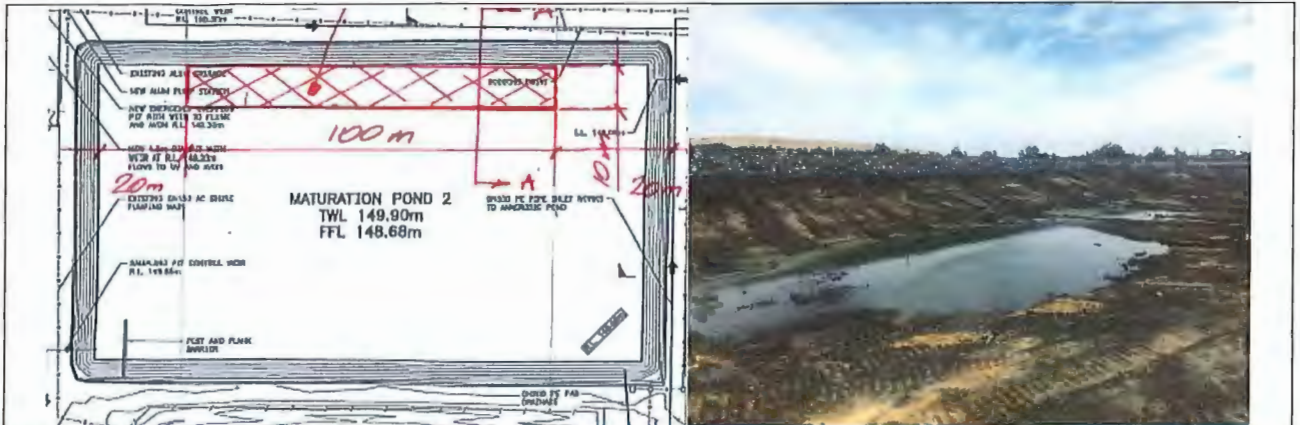


Diagram 2. and image showing area in the north-western portion of Pond 2 where pooling has occurred; and remedial works are to be conducted in the short term

Cause (or suspected cause) of non-compliance:

It is suspected that the compromise in the clay liner had resulted due to the cementing of lateritic gravel, a composite material of the clay liner itself. The cementing of the lateritic gravel is likely to have caused cracks in the liner and opportunity/pathway for seepage. The structural integrity of the containment infrastructure itself was not compromised as a result.

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

Water Corporation undertook relining works to rectify affected areas of the pond using a Geosynthetic Clay Liner (GCL), this work was completed in April 2020.

The Secondary Treatment Pond 2 will be permanently taken offline as part of the upgrade plans (refer to Works Approval 6224/2019/1 issued 23 December 2019).

Was this non-compliance previously reported to DER?

Yes, and

Reported to DER verbally



Date: / /

Reported to DER in writing

Date: 04/06/2020

Section F – Declaration

Department of Environment Regulation

| | | | |
|---|---|-----------------|--|
| 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 Environment Regulation's (DER) website. | | | |
| Signature ² : |  | Signature: | |
| Name: (printed) |  | Name: (printed) | |
| Position: | General Manager Operations | Position: | |
| Date: | 07/08/2020 | 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.