



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L7690/1997/6	Licence file number:	DER2014/001262
Licence holder:	Water Corporation		
Trading as:	Denham 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)

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	220 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:	1.3.5 (c)	Date(s) of non-compliance:	31/05/2021
Details of non-compliance:			
<p><i>Condition 1.3.5 (c) states that The Licensee shall manage all wastewater treatment, and infiltration ponds such that:</i></p> <p><i>(c) Integrity of containment infrastructure is maintained.</i></p> <p>Erosion is evident on the pond embankments (identified during an internal audit). A review of the groundwater monitoring data has also shown an increase in Total Nitrogen (TN) in Bores 1/98, 2/98 and 4/98 from approximately 2015/2016 onwards. <i>E. coli</i> in groundwater is not sampled as part of the licence however consultant samples conducted in November 2020 in bore 4/98 report concentration comparable to influent.</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>It is suspected that the treatment ponds at Denham WWTP are leaking and impacting the groundwater in the vicinity of the plant. Additionally, native vegetation dependent on the groundwater in the vicinity may be impacted by the increase nutrient levels in the groundwater.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Increased rain in the region may have resulted in some erosion. Additionally, it was determined that earthquakes in the region in December 2018 and February 2019 may have impacted the integrity of the liner. Some tears were noticed in the above effluent line of Pond 3 and 3 and these were repaired in early 2020. Below the effluent line was not investigated for further tears in the liner.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>An action to conduct an investigation into the integrity of the pond liners and to repair erosion on banks has been entered into Water Corporations Asset Deficiency Register (ADR). This investigation will review liner integrity, particularly below effluent levels and repairs to follow if issues are found. While pond liners are being repair, erosion on banks will also be rectified.</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		Date: 01 / 09 / 2019 AACR 2018/19	

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 (e)	Date(s) of non-compliance:	31/05/2021
Details of non-compliance:			
<p><i>Condition 1.3.5 (e) states that The Licensee shall manage all wastewater treatment, and infiltration ponds such that:</i> <i>(e) Vegetation and floating debris (emergent or otherwise) is prevented from encroaching onto pond surfaces or inner pond embankments.</i></p> <p>An internal audit recorded a large volume of floating debris on Pond 1.</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>No environmental impact from this non-compliance</p>			
Cause (or suspected cause) of non-compliance:			
<p>This non-compliance may have been caused lack of aeration in the ponds, particularly in the cooler months when wind movement on the ponds decreases, and a build of sludge.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Pond 1 is to be scheduled to have a sludge profile completed. Additionally, Water Corporation are assessing the viability of installing aeration pumps on a seasonal basis during the months where wind movement decreases.</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:	5.2.1	Date(s) of non-compliance:	08/06/2021
Details of non-compliance:			
<p><i>Condition 5.2.1 requires reporting of non-compliance to DWER in AACR.</i></p> <p>A trend in increasing TN in groundwater near the Denham WWTP was noticeable in the 2019-2020 reporting period, however not raised as a non-compliance and not reported in the AACR for that reporting period. The increasing TN trend was identified again in the 2020-2021 reporting period and therefore a non-compliance was raised for the integrity of the containment system. In the 2018-2019 AACR Water Corporation stated that they would report on the status of investigations into the integrity of the pond containment infrastructure in the 2019-2020 AACR, this did not occur.</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 are no known environmental impacts associated with this non-compliance.			
Cause (or suspected cause) of non-compliance:			
Failure to notice a trend and compare groundwater monitoring data accurately against historical trends.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
In the 2020-2021 reporting period, improvements were made to internal licence monitoring systems through the development of a MS PowerBI database which assists with condition ownership as well as identification, accountability, tracking and resolution of non-compliances. The database is also used as a reporting tool for all “open” non-compliances and is reviewed Water Corporation’s Environmental Compliance Governance Panel monthly until resolved.			
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.

