

## ANNUAL RETURN

Information on this form is required in accordance with the conditions of your licence or approval issued under part 5 of the *Waste Management and Pollution Control Act* or part 7 of the *Water Act*.

Failure to provide the information requested on this form and/or the provision of false or misleading information is an offence under the legislation and you may be liable to heavy penalties.

|                             |                         |
|-----------------------------|-------------------------|
| <b>LICENCE/APPROVAL NO.</b> | EPL218                  |
| <b>REPORTING PERIOD</b>     | 01/09/2020 - 31/08/2021 |

### Section 1. Licence/Approval Holder Details

Please check your business details and contact details including 24 hour emergency response in NT EPA online and/or on page one of your licence.

Are these details correct?

Yes      Go to Section 2

No      Please correct your details by updating in NT EPA Online or complete the table below.

| Licence holder               |                 |
|------------------------------|-----------------|
| Legal Entity Name:           |                 |
| ABN:                         |                 |
| Registered Business Address: |                 |
| Postal Address:              |                 |
| Contact Person:              |                 |
| Position Title:              |                 |
| Contact Details:             |                 |
|                              | b/h:            |
|                              | mobile:         |
|                              | email:          |
| Location of premises         |                 |
| Address:                     |                 |
| 24 hour emergency response   |                 |
|                              | Position Title: |
|                              | phone:          |
|                              | mobile:         |

**Section 3. Report of Non-compliance**

Please supply the following details for each non-compliance not reported to the NT EPA identified in Section 2. Use a separate page for each non-compliance.

|   |
|---|
| The date and time of the non-compliance.  |
|   |
| When the non-compliance was detected and by whom.   |
|   |
| The actual and potential causes and contributing factors to the non-compliance.                                   |
|   |
| The risk of environmental harm arising from the non-compliance.   |
|   |
| The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance. |
|   |
| Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.                 |
|   |
| If no action was taken, why no action was taken.  |
|   |

9<sup>th</sup> October 2020

Chief Executive Officer  
Northern Territory Environment Protection Authority  
GPO Box 3675  
Darwin NT 0801

**BY EMAIL: [Waste.NTEPA@nt.gov.au](mailto:Waste.NTEPA@nt.gov.au)**

Dear Chief Executive Officer

**RE: Darwin Turf Club Fannie Bay Racecourse – EPL218 Monitoring  
GME and Air Monitoring Report – October 2020  
Non-Compliance Notification**

In accordance with your Department's instruction under Environmental Licence Number (EPL) 218 as per clause 35, the NT EPA is to be notified as soon as practicable after becoming aware of the non-compliance.

This is being done upon receipt today of Darwin Turf Club Fannie Bay Racecourse GME and Air Monitoring Report – October 2020 in relation to the track conditioning activities undertaken in September 2020 in accordance with the Environmental Protection Licence (EPL) 218 requirements for the site.

Some parameter exceedances for groundwater were detected and have been summarised in sections 5 and 6 of the report and the notifiable non-compliances summarised in the tables below.

Table 1 – Notifiable exceedances

| Well ID | Three consecutive exceedance of trigger values | Exceedance by three times trigger value |  | Date and Time     |                     |
|---------|--|---|--|-------------------|---------------------|
|         |  | GME 4                                   | GME 5  | GME 4             | GME 5               |
| MW03    | pH, DO, EC, copper, zinc                       | DO, copper                              | DO, turbidity, copper                            | 8/9/2020 10:53 AM | 16/09/2020 10:06 AM |
| MW04    | pH, DO, EC, cadmium, copper, nickel, zinc      | DO, EC, turbidity, copper, nickel, zinc | DO, EC, turbidity, cadmium, copper, nickel, zinc | 8/9/2020 11:37 AM | 16/09/2020 11:05 AM |
| MW05    | Copper, zinc                                   | Copper                                  | Copper   | 8/9/2020 12:11 PM | 16/09/2020 11:44 AM |
| MW06    | pH, DO, copper                                 | DO, copper, zinc                        | DO, copper                                       | 8/9/2020 12:55 PM | 16/09/2020 11:57 AM |
| MW07    | pH, DO, EC, copper, zinc                       | DO, EC, Copper                          | DO, EC, copper                                   | 8/9/2020 01:42 PM | 16/09/2020 01:24 PM |

As per clause 35 of the EPL, the EPA is to be notified as soon as practicable after becoming aware of the non-compliance. With clause 36 detailing the information to be including in the notification to the EPA. Below is clause 36 and the information to be included for each item.

*Clause 36: The licensee must include in the notification of non-compliance the following information:*

*36.1 When the non-compliance was detected and by whom;*

When: Sampling completed for GME 4 on 8 September 2020, with Laboratory results received 15 September 2020. GME 5 on 16 September 2020, with laboratory results received on 23 September 2020

Whom: GHD undertook the sampling, with ALS the testing Laboratory

*36.2 The date and time of the non-compliance;*

Date and time: Refer to above

*36.3 The actual and potential causes and contributing factors to the non-compliance;*

Causes and contributing factors:

pH, DO and turbidity: Naturally occurring levels in the groundwater

EC: Monitoring well MW04 location in a tidally influence area/zone

Metals: Potential leaching from the natural ground.

*36.4 The risk of environmental harm arising from the non-compliance;*

There is little to no risk of environmental harm from the non-compliances

*36.5 The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance;*

Non-compliance documented and plans to continue monitoring, as per EPL218, to monitor levels.

*36.6 Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur; and*

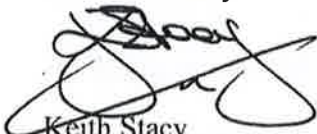
Non-compliance documented and plans to continue monitoring, as per EPL218, to monitor levels.

*36.7 If no action was taken, why no action was taken.*

N/A

Should you have any questions in relation to this please contact me without hesitation.

Yours sincerely



Keith Stacy

Chief Operating Officer

E: [kstacy@darwinturfclub.org.au](mailto:kstacy@darwinturfclub.org.au)

**Table 2 Notifiable exceedances values for three consecutive exceedances**


| Well ID | Parameter/Analyte | pH       | DO     | EC     | Turbidity | Copper | Nickel | Zinc  |
|---------|-------------------|----------|--------|--------|-----------|--------|--------|-------|
|         | Trigger value     | 6.0-8.0  | 80-110 | 20-250 | 2-15      | 0.0018 | 0.013  | 0.005 |
|         | Unit              | pH units | %Sat.  | µS/cm  | NTU       | mg/L   | mg/L   | mg/L  |
| MW03    | Wet season GME    | 5.60     | -0.3   | 529    | 2197      |        |        |       |
|         | GME 6             | 5.22     | 0.5    | 481.1  | 0.79      | Nil    | Nil    | Nil   |
|         | GME 7             | 5.21     | 0.8    | 491.5  | 1.80      |        |        |       |
| MW04    | Wet season GME    | 4.52     | -2.39  | 20,888 | 63.10     | 0.018  | 0.142  | 0.571 |
|         | GME 6             | 5.63     | 26.8   | 7,055  | 0.83      | 0.010  | 0.025  | 0.095 |
|         | GME 7             | 5.53     | 20.2   | 8,828  | 1.63      | 0.013  | 0.020  | 0.074 |
| MW05    | Wet season GME    |          |        |        | 1.27      | 0.007  |        |       |
|         | GME 6             | Nil      | Nil    | Nil    | 1.96      | 0.011  | Nil    | Nil   |
|         | GME 7             |          |        |        | 0.67      | 0.009  |        |       |
| MW06    | Wet season GME    | 4.32     | 20.2   |        |           | 0.007  |        |       |
|         | GME 6             | 4.90     | 7.4    | Nil    | Nil       | 0.005  | Nil    | Nil   |
|         | GME 7             | 4.97     | 1.8    |        |           | 0.164  |        |       |
| MW07    | Wet season GME    | 4.07     | 25.6   | 1,710  |           | 0.007  |        |       |
|         | GME 6             | 4.46     | 20.5   | 281.8  | Nil       | 0.010  | Nil    | Nil   |
|         | GME 7             | 4.45     | 31.6   | 331.4  |           | 0.010  |        |       |

**Table 3 Notifiable exceedances for three times the trigger value**

| Parameter/Analyte | EC     |       | Copper |       | Zinc  |       |
|-------------------|--------|-------|--------|-------|-------|-------|
|                   | GME 6  | GME 7 | GME 6  | GME 7 | GME 6 | GME 7 |
| Trigger value     | 20-250 |       | 0.0018 |       | 0.005 |       |
| Unit              | µS/cm  |       | mg/L   |       | mg/L  |       |
| MW03              | Nil    | Nil   | 0.011  | Nil   | Nil   | Nil   |
| MW04              | 7,055  | 8,828 | 0.010  | 0.013 | 0.095 | 0.074 |
| MW05              | Nil    | Nil   | 0.011  | 0.009 | Nil   | Nil   |
| MW06              | Nil    | Nil   | Nil    | 0.164 | Nil   | 0.206 |
| MW07              | Nil    | Nil   | 0.010  | 0.010 | Nil   | Nil   |

Should you have any questions in relation to this please contact the undersigned.

Yours faithfully



**Brad Morgan**  
Chief Executive Officer