

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.

LICENCE/APPROVAL NO.	EPL168-03
REPORTING PERIOD	16/11/2022 to 15/11/2023

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 2. Statement of Compliance

Were all conditions of the licence/approval complied with during the reporting period?

Yes Proceed to Section 4.

No Complete details below (add more rows if required)

Details of Non-compliance				
Condition number	Date of non-compliance (dd/mm/yy)	Was NT EPA notified? (Yes / No)	If yes, date NT EPA notified (dd/mm/yy)	If yes, how was NT EPA notified? (e.g. phone, email, Pollution Hotline)
		If no, complete Section 3		
Condition 7	24/11/23	Yes	18/12/23	Email
Condition 20	10/11/23	Yes	18/12/23	Email
Condition 22	10/11/23	Yes	18/12/23	Email
Condition 44	18/12/23	Yes	18/12/23	Email
Condition 46	18/12/23	Yes	18/12/23	Email

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.

Condition 7 – The licensee must provide to the NT EPA, within 10 business days of a request, a copy of any document, monitoring data or other information in relation to the activity, in the format requested by the NT EPA

Description of the non-compliance
<p>Following an incident involving a vehicle rollover and subsequent spill on 10 November 2023, the responding NT EPA Investigator raised a number of clarifying questions by email to NTRS on 21 November 2023.</p> <p>One question raised by the NT EPA Investigator (Question 5) was: <i>I was advised on site that, there was up to 1000 litres of sewerage lost. I observed a substantial amount of dark coloured and oily liquid entering the stormwater drain on Henning Road. Please provide a description, the quantity and the final destination of the listed waste that was lost.</i></p> <p>The answer provided by NTRS on 24 November 2023 was: <i>The sewerage and hydraulic oil lost are very much speculative by all concerned. The amount of dark coloured and oily liquid entering the storm water drain on Henning Road could have been a combination of sewerage and Hydraulic Oil.</i></p> <p>On 18 December 2023, the NT EPA advised NTRS by email that a potential non-compliance had arisen from failing to provide sufficient detail in response to the request for information.</p>
The date and time of the non-compliance.
2.46pm, 18 December 2023
When the non-compliance was detected and by whom.
On 18 December 2023, by Nicole Davenport, NT EPA
The actual and potential causes and contributing factors to the non-compliance.
Lack of clarity on the exact quantity and final destination of spilled waste at the time of notifying NT EPA on 24 November 2023.
The risk of environmental harm arising from the non-compliance.
Excess waste unaccounted for following tanker spill.
The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

<p>Evidence/statements have been gathered from parties involved in the spill to confirm that:</p> <ul style="list-style-type: none">• Approximately 500L of a combination of septic waste/hydraulic oil had spilt, partially entering the drain on Henning Road. The drain was pumped dry by Cleanaway (a third party assisting with the spill response)• 4kL was recovered by emptying the drain on the day of incident, and subsequently delivered to 5 Dennis Court, a facility operated by NTRS.
<p>Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.</p>
<p>Internal record keeping has been improved to quantify amount of potential waste stored, and the various waste constituents during transport for all tankers operated by NTRS.</p> <p>Training has been provided to NTRS's internal incident responders to gather witness accounts and take measurements from tankers to better assess amount of waste potentially lost.</p>
<p>If no action was taken, why no action was taken.</p>
<p>N/A</p>

Condition 20 – The licensee must ensure that accurate information about all vehicles used by the licensee in conducting the activity is maintained on the NT EPA Online Vehicle Register.

Description of the non-compliance
In response to an incident involving a vehicle rollover and subsequent spill on 10 November 2023, NTRS mobilised two company vehicles to collect and transport waste from the incident site. Neither of these vehicles were registered with the EPA to handle waste, which is a potential non-compliance with Condition 20 of NTRS's Environment Protection Licence.
The date and time of the non-compliance.
Approximately 7.00pm, 10 November 2023
When the non-compliance was detected and by whom.
On 21 November 2023, by Nicole Davenport, NT EPA
The actual and potential causes and contributing factors to the non-compliance.
Lack of registered vehicles which can be made available to collect waste in the event of a loss of control of a vehicle in operation.
The risk of environmental harm arising from the non-compliance.
Lack of capacity to collect waste spilled from a tanker.
The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.
NTRS has reviewed all currently registered vehicles which may be used to transport listed waste in an emergency, and added six new vehicles to its registration.
Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.
NTRS has: <ul style="list-style-type: none"> Reviewed its process for reviewing licence conditions prior to submitting Annual Returns to the NT EPA, and has added a review of all registered vehicles to this process. Updated its process for purchasing new vehicles to include a review as to whether the vehicle should be registered with NT EPA. NTRS will:

- Review its Emergency Response Plan to ensure that resources/vehicles which may be used to respond to an emergency in the field, as well as responsibilities for authorising and utilising these vehicles, are clarified.
- Provide additional training to all waste tanker drivers on the revised Emergency Response Plan.

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

N/A

Condition 22 –The licensee must cause listed waste to be transported in a manner that ensures listed wastes do not escape, spill or leak from the transport vehicle at anytime

Description of the non-compliance
<p>On 10 November, a Prime Mover (Registration # 1HDJ812) and Tanker (Registration # R0071) carrying approximately 20,000Ltrs of Septic rolled. During the impact damages were caused to the Prime Mover causing a Hydraulic Oil spill. The tanker also incurred damages causing a septic spill.</p> <p>NT EPA reference number is PRL12087.</p>
The date and time of the non-compliance.
10th November 2023 14.48pm
When the non-compliance was detected and by whom.
Emergency Services were first on site as per above. NTRS driver notified our office at approx 15.00pm. General Manager, Sales Manager, Asset Supervisor all proceeded to site.
The actual and potential causes and contributing factors to the non-compliance.
<p>Causes of the initial vehicle roll-over may have been:</p> <ul style="list-style-type: none"> • Driver speed whilst travelling through intersection. • Driver experience in handling a tanker and understanding a full load, especially in relation to navigating a roundabout and accommodating the camber of the road (which was approx. 300mm and may have caused the transported liquid to shift to one side of the tanker) <p>Following an investigation, we do not believe the following factors were a cause:</p> <ul style="list-style-type: none"> • Driver fatigue or influence of drugs or alcohol • Improper maintenance of the tanker • Weather conditions, such as excessive rain <p>Causes of the initial spillage from the tanker may have been:</p> <ul style="list-style-type: none"> • Emergency services identified the black pipe at the front of the tanker had been compromised and was leaking septic material, a large clamp was placed on the pipe which stopped further materials from leaking. In addition, one inspection hatch was also identified as leaking, the hatch was tightened, and material was secured. <p>Causes of the leak reaching the sewer/waterways may have been:</p> <ul style="list-style-type: none"> • Insufficient quantities of spill containment products, both on the rolled truck and available to NTRS internally to respond. • Lack of availability of NTRS internal drivers to undertake wet vacuuming of spilt waste, as the incident occurred late in the afternoon when many drivers had completed their shift. • Lack of post site review practices to identify whether the spill had been cleaned up correctly.

<p>The risk of environmental harm arising from the non-compliance.</p>
<p>Risk that all 22,000L of septic waste/hydraulic oil may have entered the adjacent drains.</p>
<p>The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.</p>
<p>Actions taken at the time of the incident were:</p> <ul style="list-style-type: none"> • Emergency services were notified of the accident at 2.48pm they arrived, first on site at 14.55pm. The team was comprised of 4 persons in the truck and 2 persons in the response vehicle. • Emergency Services confirmed safety of the bystanders and then commenced protecting the site and storm water drains. • The team placed bunding in the gutters to stop material from entering the storm water drains. • Further identification of some hydraulic oil was found leaking from the Prime Mover. Further bunding was used to protect stormwater drains and dry saw was used to cover the spill to absorb the materials. • Emergency services advised that some materials may have entered the drains. • Emergency Service contacted NTRS at approx. 15.14pm to advise of the accident. • NTRS General Manager and emergency response vehicle arrived on site at approx. 15.20pm and placed spill kit materials to protect the storm water drains. • A 3rd party, Cleanaway, was contracted and attended site with two pump trucks and a couple of emergency response vehicles. Spill kits were also provided and utilised. The pump out of septic materials from the tanker was completed. • NTRS General Manager and persons onsite shovelled the contaminated dry saw into the General Manager's Ute. This was then contained in a pod at an NTRS site, 5 Dennis Court (in accordance with an existing waste disposal licence), for onward disposal. • A 3rd party, Industrial Power Sweeping Services, attended site and completed a full street clean. • Fresh water was poured down the storm water system to clear any listed waste. Ntrs contracted Cleanaway with a pump truck and ratter to extract all materials including listed waste from the Well Creek drain. • A 3rd party, AM Cranes, completed the lift of the tanker for recovery. • A 3rd party, NTEX, provided a low loader to transport the Prime Mover and Trailer back to NTRS Woolner site.
<p>Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.</p>
<p>NTRS has:</p> <ul style="list-style-type: none"> • Engaged a 3rd party driver training and assessing company, Kullaru Training and Assessing, to certify all drivers prior to permitting them to drive tankers, front lifts, side-arms, hook lifts, rear lifts and skip trucks individually. As of 15 January 2024, we have had 8 drivers assessed through this pathway. • Contacted the manufacturer of the tanker to assess whether any reinforcing measures are required to minimise damage and contain spills from the upper lids/T-bolts of the tanker. However, no reinforcement has been recommended. • Re-purposed two utes with two 240L wheelie bins each (increased from only a single ute with a single wheelie bin) to act as additional sources of spill containment products. These have been registered with the NT EPA in order to enable transporting of waste if needed. • Expanded an existing agreement with an external provider of emergency responses, ISS, to include all prime movers and liquid trailers operated by NTRS. ISS can provide support in

coordinating emergency services, or even attend scenes to facilitate spill cleanup, if requested by NTRS.

NTRS will:

- Update our emergency response plan to clearly identify roles for:
 - initiating an emergency response
 - allocating resources (personnel and vehicles) to attend to an emergency site
 - engage third parties to support the spill response, and
 - review the emergency site on the day following the incident to ensure the clean-up efforts have been successful.
- Expand our spill kit inventories on vehicles in the field to include 10m bunding sausages to better prevent spills from entering drains. This will be a minimum of 1 bunding sausage per heavy vehicle and response ute.
- Review the location of spill kits storage for prime movers to ensure spill kits remain accessible when the vehicle cabin has been damaged or made inaccessible (such as in the case of the rollover). This may include an external toolbox.
- Training will be provided to all NTRS drivers and potential response personnel on the use of spill kits, including the new addition of bunding sausages (currently planned for late February 2024).
- Review opportunities to enter into an agreement with other waste collection companies to coordinate a joint response to spilt waste, including the provision of additional spill containment products and wet vacuuming when internal resources are insufficient. To date, discussions have progressed but have not been finalised.

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

N/A

Condition 44 – The licensee must keep records of all non-compliances with this licence. These records must be adequate to enable the licensee to comply with the non-compliance notification conditions of this licence.

Description of the non-compliance
<p>Following an incident involving a vehicle rollover and subsequent spill on 10 November 2023, NTRS lodged its Annual Report with the NT EPA on 14 November 2023. This lodgement did not include reference to any non-conformances, such as the rollover incident.</p> <p>On 18 December 2023, the NT EPA advised NTRS by email that a non-compliance may arise if it has not recorded internal information relating to non-compliances with its Environmental Protection Licence.</p>
The date and time of the non-compliance.
2.46pm, 18 December 2023
When the non-compliance was detected and by whom.
On 18 December 2023, by Nicole Davenport, NT EPA
The actual and potential causes and contributing factors to the non-compliance.
NTRS was not aware of this non-compliance until advised by NT EPA
The risk of environmental harm arising from the non-compliance.
Negligible immediate harm.
The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.
NTRS has recorded all potential non-compliances as separate files within its incident reporting software, Mango.
Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.
Guidance has been provided to all NTRS staff who may respond to an environmental incident on the requirements of NTRS's licence conditions, and been advised of the need to document individual non-compliances via the Mango software.
If no action was taken, why no action was taken.

N/A


Condition 46 – The licensee must include in the notification of non-compliance the following information:

- 46.1 when the non-compliance was detected and by whom;**
- 46.2 the date and time of the non-compliance;**
- 46.3 the actual and potential causes and contributing factors to the non-compliance;**
- 46.4 the risk of environmental harm arising from the non-compliance;**
- 46.5 the action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance;**
- 46.6 corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur; and**
- 46.7 if no action was taken, why no action was taken..**

Description of the non-compliance
<p>Following an incident involving a vehicle rollover and subsequent spill on 10 November 2023, NTRS lodged its Annual Report with the NT EPA on 14 November 2023. This lodgement did not include reference to any non-conformances, such as the rollover incident.</p> <p>On 18 December 2023, the NT EPA advised NTRS by email that a potential non-compliance had arisen from failing to provide notification of non-conformances in the appropriate reporting period.</p>
The date and time of the non-compliance.
2.46pm, 18 December 2023
When the non-compliance was detected and by whom.
On 18 December 2023, by Nicole Davenport, NT EPA
The actual and potential causes and contributing factors to the non-compliance.
NTRS was not aware that not notifying of a non-compliance would be classified as an additional non-compliance.
The risk of environmental harm arising from the non-compliance.
Negligible immediate harm.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.
NTRS has prepared this non-compliance notification.
Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.
Guidance has been provided to all NTRS staff who may respond to an environmental incident on the requirements of NTRS's licence conditions, and been advised of the need to document individual non-compliances for all licence conditions. On 29 December, all seven members of NTRS's Senior Management have been requested to formally acknowledge and sign NTRS's NT Environmental Protection Licence.
If no action was taken, why no action was taken.
N/A

Section 4. Signature and Certification

This declaration must only be signed by a person(s) with the legal authority to sign it. The ways in which the application may be signed, and the people who may sign the application, are set out in the categories below.		
If the licence holder is:	Tick	The application must be signed and certified by one of the following:
An individual	<input type="checkbox"/>	The individual.
A partnership	<input type="checkbox"/>	A partner.
A company	<input type="checkbox"/>	The common seal being affixed in accordance with the <i>Corporations Act</i> , or
	<input type="checkbox"/>	Two directors, or
	<input type="checkbox"/>	A director and a company secretary, or
	<input checked="" type="checkbox"/>	If a proprietary company that has a sole director who is also the sole company secretary – by that director.
A public authority	<input type="checkbox"/>	The Chief Executive Officer (CEO) of the public authority, or
	<input type="checkbox"/>	By a person delegated to sign on the public authority's behalf in accordance with its legislation (Please note: a copy of the relevant instrument of delegation must be attached to this application).
I/We hereby declare that the information provided in this Annual Return and accompanying documents is to the best of my/our knowledge, true and correct.		
Signature		Signature
Name (printed)	Leon Schulz	Name (printed)
Position	Director	Position
Date	08.02.2024	Date
Seal (if signing under seal):		