



Darling Quarter

OPERATIONAL AUDIT REPORT

Veolia Water Solutions & Technologies (Australia) Pty Ltd

March 2023

3.0

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Executive Summary

Audit scope

This report presents the findings of the operational audit of Veolia Water Solutions and Technologies (Australia) Pty Ltd (VTWST), conducted in March 2023, consistent with the audit requirements set out in IPART's *Audit Guideline, Water Industry Competition Act 2006 (NSW)* (July 2020).

The audit scope included an operational audit for the Darling Quarters non-potable scheme against the regulatory requirements in Table i-i. The audit period is 1 November 2021 to 31 December 2022.

Table i-i Summary of operational audit requirements

Requirement	Details	Auditor instructions
WIC Regulation Schedule 1 clause 7(4)(a)	The network operator must ensure that its water quality plan is fully implemented and kept under regular review and the network operator's activities are carried out in accordance with that plan.	Audit implementation of Water Quality Plan All elements of the AGWR will be audited
Network Operator Licence cl. B8.1	The Licensee must undertake any monitoring that is required for the purposes of this Licence, any Plan, the Act or the Regulation in accordance with this clause.	Audit
Network Operator Licence cl. B8.2	The Licensee must keep the following records of any samples taken for monitoring purposes specified in the Water Quality Plan: <ul style="list-style-type: none"> the date on which the sample was taken; the time at which the sample was collected; the point or location at which the sample was taken; and the chain of custody of the sample (if applicable). 	Audit
Network Operator Licence cl. B8.3	The Licensee must ensure that analyses of all samples taken for the purposes of Verification Monitoring are carried out by a laboratory accredited for the specified tests by an independent body that is acceptable to NSW Health, such as the National Association of Testing Authorities or an equivalent body. Testing Authorities (NATA) or equivalent, shall carry out all analyses of samples.	Audit
WIC Reg Sch 1 cl. 6(2)(a)	The licensee must ensure that the infrastructure operating plan is fully implemented and kept under regular review and, in particular, that all of its activities are carried out in accordance with that plan.	Audit

Requirement	Details	Auditor instructions
WIC Reg Sch 1 cl. 8(1)	A water meter connected to a licensee's water main must comply with the requirements of the document entitled the Plumbing Code of Australia, produced for all State governments by Australian Building Codes Board, as in force from time to time.	Audit
WIC Reg Sch 1 cl. 8(2)	While water is being supplied to premises for which a water meter has been installed, the licensee must ensure (a) the water meter is properly maintained and periodically tested, and (b) the water meter is read at intervals of no more than 4 months, and (c) written notice of each meter reading is sent to the relevant licensed retail supplier.	Audit
WIC Reg Sch 1 cl. 11	The licensee must not allow a customer's installations to be connected to the licensee's water main unless the installation is code compliant, within the meaning of the Plumbing and Drainage Act 2011.	Audit
WIC Reg Sch 1 cl. 1(2)	The licensee must immediately notify the following persons of an incident in the conduct of the licensee's activities that threatens, or could threaten, water quality, public health or safety— (a) IPART, (b) the Minister administering the Public Health Act 2010, (c) the Minister administering the Act, Part 2, (d) N/A (e) any other licensed network operator or public water utility whose infrastructure is connected to the licensee's infrastructure.	Audit Clause relates to notification only. Sub-clauses (b), (c) and (e) only relevant if triggered by sub-clause (a). Auditor to check that all incidents within the audit period have been reported as required.
Non compliances from 2021 Audit	RW 2021:1 OFI RW 2021.1, OFI RW 2021.2, OFI RW 2021.3, OFI INF 2021.1, OFI INF 2.21.2	Auditor to check for completion of the recommendation RW 2021.1 Auditor to note the 5 OFIs
	REC-DW-2020.02	Auditor to note.
Closed out non-compliances from 2020 audit	REC-DW-2020.02 REC-DW-2020.01	Auditor to note.

Audit findings

A summary of compliance for the Darling Quarter is shown in Table i-ii.

Table i-ii Summary of compliance

Requirement	Licence clause	Compliance
Water quality plan	WIC Regulation Schedule 1 clause 7(4)(a)	Non-compliant (non-material)
	Network Operator Licence cl. B8.1	Compliant
	Network Operator Licence cl. B8.2	Compliant
	Network Operator Licence cl. B8.3	Compliant
Infrastructure Operating Plan	WIC Regulation Schedule 1 clause 6(2)(a)	Compliant
Customer connections	WIC Reg Sch 1 cl. 8(1)	Compliant
	WIC Reg Sch 1 cl. 8(2)	Compliant
	WIC Reg Sch 1 cl. 11	Compliant
Incident notification	WIC Regulation Schedule 1 clause 1(2)(a)	No requirement
	WIC Regulation Schedule 1 clause 1(2)(b)	No requirement
	WIC Regulation Schedule 1 clause 1(2)(c)	No requirement
	WIC Regulation Schedule 1 clause 1(2)(e)	No requirement
Non-compliances from 2021 audit report	WIC Reg Sch 1 cl. 7(4)(a) Recommendation RW2021.1	Incomplete

Recommendations and OFIs

There following recommendations made as part of the audit process.

- Recommendation RW 2022.1: Review delays in CCP alarms and shutdown control and ensure that the CCP table in the Water Quality Plan reflects these delays.
- Recommendation RW 2022.3: Develop a system to measure alarm when CCP limits have been exceeded and the plant is online.

The following opportunities for improvement were made as part of the audit process:

- OFI RW 2022.2: Resolve discrepancies between contact lists in the Darling Quarter Recycling Water Treatment Scheme Incident reporting to the Authorities after hours and Appendix 2 of the Water Quality Plan.

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1 Introduction

1.1 Objectives

This report presents the findings of the operational audit of Veolia Water Solutions and Technologies (Australia) Pty Ltd (VWST) for the Darling Quarter scheme, consistent with audit requirements set out in IPART's *Audit Guideline, Water Industry Competition Act 2006 (NSW)* (July 2020).

1.2 Licencee's infrastructure, systems and procedures

VWST's operations and obligations are managed through an integrated Business Management System (BMS), independently certified to:

- AS/NZS ISO 9001 Quality Management Systems
- AS/NZS ISO 14001 Environmental Management System
- AS/NZS 4801 Work Health and Safety Management Systems

The BMS is managed through an intranet site which includes overarching documents including

- Water Quality Policy
- Work Health Safety documentation
- Incident Management procedures

These are supported by Darling Quarter scheme-specific documentation which are located on network folders. The documents that detail how VWST meets their licence plan requirements are called up in this documentation. We have recorded the documents we audited as part of these plans in Appendix A.

2 Audit method

2.1 Audit scope

The audit scope included an operational audit for the Darling Quarter non-potable scheme against the regulatory requirements in Table 2-1. The audit period is the 1 November 2021 to 31 December 2022.

Table 2-1. Summary of operational audit requirements

Requirement	Details	Auditor instructions
WIC Regulation Schedule 1 clause 7(4)(a)	The network operator must ensure that its water quality plan is fully implemented and kept under regular review and the network operator's activities are carried out in accordance with that plan.	Audit implementation of Water Quality Plan All elements of the AGWR will be audited
Network Operator Licence cl. B8.1	The Licensee must undertake any monitoring that is required for the purposes of this Licence, any Plan, the Act or the Regulation in accordance with this clause.	Audit
Network Operator Licence cl. B8.2	The Licensee must keep the following records of any samples taken for monitoring purposes specified in the Water Quality Plan: <ul style="list-style-type: none"> • the date on which the sample was taken; • the time at which the sample was collected; • the point or location at which the sample was taken; and • the chain of custody of the sample (if applicable). 	Audit
Network Operator Licence cl. B8.3	The Licensee must ensure that analyses of all samples taken for the purposes of Verification Monitoring are carried out by a laboratory accredited for the specified tests by an independent body that is acceptable to NSW Health, such as the National Association of Testing Authorities or an equivalent body. Testing Authorities (NATA) or equivalent, shall carry out all analyses of samples.	Audit
WIC Reg Sch 1 cl. 6(2)(a)	The licensee must ensure that the infrastructure operating plan is fully implemented and kept under regular review and, in particular, that all of its activities are carried out in accordance with that plan.	Audit
WIC Reg Sch 1 cl. 8(1)	A water meter connected to a licensee's water main must comply with the requirements of the document entitled the Plumbing Code of Australia, produced for all State governments by Australian Building Codes Board, as in force from time to time.	Audit

Requirement	Details	Auditor instructions
WIC Reg Sch 1 cl. 8(2)	While water is being supplied to premises for which a water meter has been installed, the licensee must ensure (a) the water meter is properly maintained and periodically tested, and (b) the water meter is read at intervals of no more than 4 months, and (c) written notice of each meter reading is sent to the relevant licensed retail supplier.	Audit
WIC Reg Sch 1 cl. 11	The licensee must not allow a customer's installations to be connected to the licensee's water main unless the installation is code compliant, within the meaning of the Plumbing and Drainage Act 2011.	Audit
WIC Reg Sch 1 cl. 1(2)	The licensee must immediately notify the following persons of an incident in the conduct of the licensee's activities that threatens, or could threaten, water quality, public health or safety— (a) IPART, (b) the Minister administering the Public Health Act 2010, (c) the Minister administering the Act, Part 2, (d) N/A (e) any other licensed network operator or public water utility whose infrastructure is connected to the licensee's infrastructure.	Audit Clause relates to notification only. Sub-clauses (b), (c) and (e) only relevant if triggered by sub-clause (a). Auditor to check that all incidents within the audit period have been reported as required.
Non compliances from 2021 Audit	RW 2021:1 OFI RW 2021.1, OFI RW 2021.2, OFI RW 2021.3, OFI INF 2021.1, OFI INF 2.21.2	Auditor to check for completion of the recommendation RW 2021.1 Auditor to note the 5 OFIs
	REC-DW-2020.02	Auditor to note.
Closed out non-compliances from 2020 audit	REC-DW-2020.02 REC-DW-2020.01	Auditor to note.

2.1.1 Audit standards

In conducting this audit, the auditor has adopted the audit standard *ISO 19011:2019 Guidelines for auditing management systems*. This standard ensures that the audit is conducted in accordance with an established and recognised audit protocol.

Regard will also be given to the following standards/guidelines, especially where these provide specific detail that are appropriate to this audit.

- ASAE 3100 (2017) Compliance Engagements issued by the Auditing and Assurance Standards Board

- ISO 17021:2015 Conformity Assessment – Requirements for bodies providing audit and certification of management systems (contains principles and requirements for the competence, consistency and impartiality of the audit and certification of management systems of all types)
- IPART (2020) Audit Guideline Water Industry Competition Act 2006 — Guideline Water, July 2020

2.2 Audit steps

A summary of audit steps is shown in Table 2-2.

Table 2-2. Audit steps

Step	Item	Details
Step 1	Initiation	Licensee initiates audit via WILMA (Water Industry Licence Management Application)
	Engagement of approved auditor	Licensee engages approved auditor to undertake audit
	Audit proposal	Auditor develops audit proposal and provides it to licensee for submission to IPART via WILMA
		Licensee submits the audit proposal to IPART for approval via WILMA IPART reviews proposal IPART approves audit proposal
Step 2	Opening meeting	Auditor conducts opening meeting
	Audit interviews	Auditor undertakes interviews
Step 3	Draft audit report	Auditor prepares draft audit report and submits it via WILMA
		Licensee and IPART review draft audit report Opportunity for comment on the draft audit report
	Final audit report	Auditor finalises audit report
	Final audit report submission	Auditor submits final report to IPART via WILMA
Step 4	Non-compliance matters	Non-compliance matters will be addressed in accordance with IPART's Compliance and Enforcement Policy

Source: Audit Guideline, *Water Industry Competition Act 2006* (NSW) (IPART, July 2020)

2.3 Audit grades

The audit grade definitions used in assessing the auditee's performance against the requirements are set out in Table 2-3.

Table 2-3. Audit grades

Grade	Detail
Compliant	Sufficient evidence is available to confirm that the requirements have been met.

Grade	Detail
Non-compliant (non-material)	Sufficient evidence is not available to confirm that the requirements have been met and the deficiency does not adversely impact the ability of the licensee to achieve defined objectives or assure controlled processes, products or outcomes.
Non-compliant (material)	Sufficient evidence is not available to confirm the requirements have been met and the deficiency does adversely impact the ability of the licensee to achieve defined objectives or assure controlled processes, products or outcomes.
No requirement	There is no requirement for the licensee to meet this criterion within the audit period.

Source: Audit Guideline, *Water Industry Competition Act 2006* (NSW) (IPART, July 2020)

2.4 Audit team

The audit team qualifications are shown in Table 2-4.

Table 2-4. Project team

Team Member	Details
David Bartley Lead auditor	David Bartley holds the following auditor qualification <ol style="list-style-type: none"> 1. A registered Exemplar Global lead auditor (Certificate No. 206802): <ol style="list-style-type: none"> a. Exemplar Global -DW (Drinking Water) b. Exemplar Global -RW (Recycled Water) c. Exemplar Global TL-AU (Lead Auditor) 2. NSW IPART (Independent Pricing and Regulatory Tribunal) qualified: <ol style="list-style-type: none"> a. Area Specialist Infrastructure Performance b. Area Specialist Recycled Water Quality c. Area Specialist Sewage Management d. Area Specialist Environmental Management
Natalie Crawford QA	Natalie Crawford holds the following auditor qualifications: <ol style="list-style-type: none"> 1. A registered Exemplar Global lead auditor (Certificate No. 130608): <ol style="list-style-type: none"> a. Exemplar Global -DW (Drinking Water) b. Exemplar Global -RW (Recycled Water) c. Exemplar Global TL-AU (Lead Auditor) 2. NSW IPART (Independent Pricing and Regulatory Tribunal) qualified: <ol style="list-style-type: none"> a. Auditor Licence and regulatory compliance b. Drinking Water Quality Auditor and Area Specialist c. Recycled Water Quality Auditor and Area Specialist d. Environmental management Auditor and Area Specialist

2.5 Quality assurance process

Checks of information received were conducted and included aspects such as veracity of information, coverage of the subject area being audited and document adequacy. Professional scepticism (as per ASAE 3100) was applied as part of the document review. The quality assurance approach to this audit involved independent peer review from a qualified auditor (Natalie Crawford) who was not part of the audit, and review by the lead auditor.

2.6 Audit plan

The audit plan is shown in Table 2-5 for the Darling Quarter audit.

Table 2-5. Darling Quarter audit plan

Task	Details	Timeline
Task 1 Audit Preparation	Develop audit plan	2 December 2022
	Data request, Project management	19 January 2023
Task 2 Desktop Audit	Evidence provided to Auditor and IPART Information review and desktop audit	21 February 2023
Task 3 Audit Interviews/site visit	Site visit	9 February 2023
	Interviews and close out meeting	9 February 2023
Task 4 Reporting	Draft Report to VWST and IPART	10 March 2023
	Comments received	17 March 2023
	Final Report	31 March 2023

3 Water quality plan audit findings

A summary of the recycled water quality plan audit requirements and the compliance grade is shown in Table 3-1.

Table 3-1. Recycled water quality plan audit requirements and compliance grade

Ref	Requirement	Compliance
WIC Regulation Schedule 1 clause 7(4)(a)	The network operator must ensure that its water quality plan is fully implemented and kept under regular review and the network operator's activities are carried out in accordance with that plan.	Non-compliant (non-material)
Network Operator Licence cl. B8.1	The Licensee must undertake any monitoring that is required for the purposes of this Licence, any Plan, the Act or the Regulation in accordance with this clause.	Compliant
Network Operator Licence cl. B8.2	The Licensee must keep the following records of any samples taken for monitoring purposes specified in the Water Quality Plan: <ul style="list-style-type: none"> the date on which the sample was taken; the time at which the sample was collected; the point or location at which the sample was taken; and the chain of custody of the sample (if applicable). 	Compliant
Network Operator Licence cl. B8.3	The Licensee must ensure that analyses of all samples taken for the purposes of Verification Monitoring are carried out by a laboratory accredited for the specified tests by an independent body that is acceptable to NSW Health, such as the National Association of Testing Authorities or an equivalent body. Testing Authorities (NATA) or equivalent, shall carry out all analyses of samples.	Compliant

3.1 Summary of findings

3.1.1 Water quality plan (WIC Reg Sch 1 cl. 7(4)(a))

During the audit period VWST managed the water quality at the Darling Quarter recycled water plant through the Network Operator's Water Quality Plan (WQP) (Rev 9, August 2021). This WQP was updated on 22 December 2022 however Revision 9 was in effect for most of the audit period.

Table 3-2 of the WQP details how the requirement of each of the Australian Guidelines for Water Recycling (AGWR) Framework elements, component and actions is met (audit findings column). Evidence to meet each requirement is also listed where relevant. This approach clearly and comprehensively documents how VWST implements the requirements of the AGWR Framework.

The implementation of the WQP is considered non-compliant due to exceedances of the critical control point (CCP) limits. This non-compliance is not considered material as these exceedances are due to delays in the control system that allow the plant to start up which are

not reflected in the CCP table. It was also not possible to verify compliance with the membrane filtration CCP critical limit for the turbidity critical limit of less than 0.3 NTU 95% of the time. Recommendations are included for these shortcomings.

The WQP is up to date and has been reviewed regularly, most recently in December 2022.

Opportunities for improvement are included relating to minor discrepancies in the contact lists between documents.

3.1.2 Monitoring (Network Operator Licence cl. B8.1, B8.2, B8.3)

Network Operator Licence clauses B8.1, B8.2 and B8.3 relate to water quality monitoring.

VWST have demonstrated through the provision of data that appropriate operational and verification monitoring is undertaken in accordance with the requirements of the water quality plan. This is discussed further in Element 3, 4 and 5 in Table 3-2. Clause B8.1 is found to be compliant.

Sample and lab results sheets from ALS include the date, time and location of all samples received. Chain of Custody forms were provided for all samples taken in the audit period and record VWST collecting the sample and collection of the samples from the plant by ALS. The Chain of Custody forms for November 2021 and July 2022 forms were sampled all included the time of the sample collection. Therefore, Clause B8.2 is found to be compliant.

VWST engage ALS, a NATA accredited laboratory to undertake their verification analysis, adequate evidence of the laboratory analysis was provided. Clause B8.3 is found to be compliant.

3.2 Water quality plan (WIC Reg Sch 1 cl. 7(4)(a)) detailed findings

The detailed findings of the WQP implementation against each of the AGWR elements is included in Table 3-2.

Table 3-2. Audit findings against the AGWR Framework

Element	Component	Audit findings	Evidence
Element 1 Commitment to Recycled water quality management	Responsible use of recycled water	The key stakeholders listed in the WQP including government agencies are listed and their roles in the implementation of the WQP are current. VWST have demonstrated that they have involved the relevant agencies as required including frequent communication and monthly reporting to Jones Lang Laselle (JLL) and annual reporting to IPART.	220430 DQ Monthly Report Veolia April 2022 220731 DQ Monthly Report Veolia July 2022 21-22 DWP annual report to IPART
	Regulatory and formal requirements	The regulatory and formal requirements list in the WQP was found to be current and staff onsite demonstrated awareness of the relevant regulatory bodies and their roles. To ensure staff and contractors understand their responsibilities, Veolia require a visitor induction that includes a brief summary of responsibilities and license obligations. Numerous visitor inductions were provided as evidence, the completed form for CAPS on 16 December 2022 form was sampled as evidence of this component. The induction forms were also viewed in hard copy onsite.	221216 - DQ- TOOL05_Visitor_Induction - CAPS PK Hard copies of the visitor induction forms onsite.
	Engaging stakeholders	The key agencies list included in the WQP was up to date. The WQP has been reviewed annually since 2019, most recently in December 2022 (documented in version control). The key partnership between JLL and VWST is well established, with frequent communication reported with monthly reports provided as evidence (April and July 2022). As JLL is the only end user, this is the only communication required for end user engagement.	220430 DQ Monthly Report Veolia April 2022 220731 DQ Monthly Report Veolia July 2022
	Recycled water policy	The water quality policy was available on the website as stated in the WQP, it was also sighted on the wall of the plant during the site visit and was listed as an item on the training plan for	Water Quality Policy Service Engineer Training records

Element	Component	Audit findings	Evidence
		<p>the Service Engineer that was provided as evidence. During the video interview, staff were able to access the most recent version of the Water Quality Policy (February 2021) from their intranet.</p> <p>We are satisfied that employees are aware of the policy and their roles in implementing it.</p>	
Element 2 Assessment of the Recycled water supply system	<p>Intended uses and source of recycled water</p> <p>Water supply system analysis</p> <p>Assessment of water quality data</p> <p>Hazard identification and risk assessment</p>	<p>The risk assessment undergoes an internal review every year to ensure it is current. Evidence was provided that the risk assessment was reviewed by the Senior Contracts Manager and the Services Manager on 19/10/2022 and approved by the Operations Manager – North East Region on 21/10/2022. This process engages all staff involved in the operation of the plant. In the audit period there were no system changes, if there were system changes, external agencies would be involved in the review.</p> <p>The register covered appropriate maximum and residual risks assessment with level of uncertainty documented for each risk item.</p> <p>Appropriate system information including treatment, a flow diagram and intended/unintended end uses is documented in the Retail Supply Management Plan (RSMP) to inform the risk assessment.</p> <p>The Water Quality Plan includes a process flow diagram (PFD). This PFD was reviewed during the site visit and was consistent with the diagram in the WQP.</p>	<p>Darling Quarter Development Retail Supplier's Retail Supply Management Plan</p> <p>221022 - App.6-Darling Quarter Risk Assessment-G.pdf</p>
Element 3 Preventive measures for Recycled water quality management	<p>Preventive measures and multiple barriers</p>	<p>During the site visit the observed preventive measures in place were found to be adequate. Barriers listed in the risk register that were checked onsite include backflow prevention on the Sydney Water potable water supply and documentation of the annual cross connection testing undertaken by JLL.</p>	<p>221230 - Water supply services audit - Wagner Group Services</p> <p>210627 - Job Photo Report 33464 Non Cross connection inspection audit</p> <p>200517 - 1 Harbour St Sydney_ Asset_Backflow Prevention Device - Inspection and Maintenance Reports</p>

Element	Component	Audit findings	Evidence
	Critical control points	[REDACTED]	Process Data from 31-10-21 to 05-01-23 VWT SCADA set points onsite Monitoring locations Email from VWST dated 9/3/23

Element	Component	Audit findings	Evidence
Element 4 Operational procedures and process control	Operational procedures	<p>Records are maintained to demonstrate implementation of operational procedures, monitoring protocols and corrections. Evidence of visitor's induction forms were provided with names and dates. The completed form for CAPS on 16 December 2022 form was sampled as evidence of this component. The induction forms were also viewed in hard copy onsite. and found to be appropriately filled in and cover the necessary content.</p> <p>All the SOPs were provided as evidence and cover the appropriate material including chemical samples, sensor calibration, clean in place for the membranes, chemical delivery and blower filter replacement. SWMS were sighted on the wall at the plant.</p>	<p>TOOL05_Visitor_Induction - CAPS PK BR18-GU19-TOOL02 Hazardous Chemicals Register - DQ SOP Chemical Delivery Darling Quarter SOP CIP MBR (Rev.1) SOP CIP RO (Rev.1) SOP Sensors (pH, Conductivity and Chlorine) calibration (Rev.1) SOP Water Sample Collection (Rev.1) 220819 - SWMS VWT - Buffer Tank Pump Seal Replacement</p>

Element	Component	Audit findings	Evidence
	Operational monitoring	Operation of the plant is monitored using SCADA. Data is available on the plant computer for 30 minutes and following this 15-minute interval results are recorded on the operational monitoring spreadsheet. Comments on the operational data is made in the 'Reason' comment.	RWTP DQ - Monitoring Master Spreadsheet Process Data from 31-10-21 to 05-01-23 VWT Monitoring locations
	Corrective action	The plant automatically shuts down in the event of a CCP breach and the limits for shutdown and alarms were checked on the plant computer. Shut down setpoints are just before the CCP limits so that there is a reduced risk of CCP exceedance. CCP compliance is discussed in Element 3	SCADA set points onsite
	Equipment capability and maintenance	The most recent weekly and monthly inspection checklists from plant inspections were viewed during the site visit as evidence of regular inspection (February 2023). The dates these checks are undertaken are recorded digitally in the RWTP DQ - Monitoring Master Spreadsheet in the 'Diary' tab. The checklist notes any maintenance that is carried out. Maintenance work carried out is also recorded on the spreadsheet in the 'Diary' and 'Maintenance' tabs, the March 2022 maintenance was checked and was consistent with the required frequency. Calibration certificates for the audit period were provided as evidence. The chlorine analyser calibration certificate carried out on 26 May 2022 was reviewed and matched the entry in the 'Diary' tab. The UV sensor calibration conducted on 1 March 2022 was also reviewed and matched the completed schedule. The calibrations observed were found to be consistent with the calibration schedule. Equipment observed onsite was in good condition and well maintained. Further discussion on equipment maintenance is included in Section 4.	RWTP DQ - Monitoring Master Spreadsheet AIT3101_N9028D05LC0_20220526 220301 - UV Sensor calcert A30000 SN 043472 CN 33221340 220301 sig_000170 March 2022 weekly and monthly checklist Calibration & equipment maintenance schedule - DQ
	Materials and chemicals	The Hazardous Chemicals register was provided which details the chemicals stored onsite and the expiry date. The register was up to date and all safety data sheets were current.	Chemical register onsite SOP Chemical Delivery Darling Quarter

Element	Component	Audit findings	Evidence
		<p>We are satisfied that the chemicals and materials used in the system are appropriate and meet specifications.</p> <p>VWST have an SOP for chemical deliveries to Darling Quarter which requires an operator to be present during the delivery, to confirm the correct chemical is delivered to the correct tank and that any spills are contained.</p>	
Element 5 Verification of recycled water quality	Recycled water quality monitoring	<p>Data from February 2022 in the RWTP DQ - Monitoring Master Spreadsheet was reviewed and the Certificate of Analysis form of the lab results to confirm data matched and the results were the same.</p> <p>The February 2022 lab data recorded in RWTP DQ - Monitoring Master Spreadsheet against the sampling plan detailed in the WQP. The correct weekly <i>E. coli</i> tests and monthly BOD5, suspended solids and TDS were undertaken and results were within the target ranges.</p> <p>The process for collecting lab samples is for the Service Engineer to take a sample, call ALS who will pick up the temperature-controlled sample in approximately 2 hours for analysis. The Chain of Custody Documents record this process, the February 2022 forms were reviewed as evidence and found to be consistent with the process described by the operators.</p>	RWTP DQ - Monitoring Master Spreadsheet Certificates of analysis for February 2022
	Consumer satisfaction	<p>Customer complaints are received through JLL. If a complaint is received, JLL is responsible for informing VWST and working together on a solution. This was not required in the audit period as there were no complaints. We are satisfied that the requirements of this component are being met.</p>	Interviews
	Short-term evaluation of results Corrective action	<p>VWST has demonstrated through knowledge on the site visit and reporting that water quality data is used to inform operational decisions at the RWTP.</p> <p>The monthly reports to JLL include trends of treated water quality over the last 12 months. Copies of the monthly reports for April and July 2022 were provided as evidence.</p>	220430 DQ Monthly Report Veolia April 2022 220731 DQ Monthly Report Veolia July 2022

Element	Component	Audit findings	Evidence
Element 6 Management of incidents and emergencies	Communication Incident and emergency response protocols	<p>Incident management and reporting for Darling Quarter is covered by the following three documents:</p> <ul style="list-style-type: none"> • Water Quality Plan (Section 12.6, Appendix 1 and 2) • Darling Quarter – Emergency Response Procedures Manual • Darling Quarter Recycling Water Treatment Scheme - Incident reporting to the Authorities after hours <p>The following minor errors and discrepancies were found in these documents:</p> <ul style="list-style-type: none"> • The Darling Quarter Recycling Water Treatment Scheme - Incident reporting to the Authorities after hours has no document number, revision or date • The email for Toni Cains from NSW Health is incorrect in Darling Quarter Recycling Water Treatment Scheme - Incident reporting to the Authorities after hours • The contact for IPART is different in Appendix 2 of the WQP and the Darling Quarter Recycling Water Treatment Scheme - Incident reporting to the Authorities after hours • Appendix 2 of the WQP refers to Department of Planning, Industry and Environment that is now the Department of Planning and Environment • The Darling Quarter Recycling Water Treatment Scheme - Incident reporting to the Authorities after hours has the email address for NSW Health Water Unit as a contact for Department of Planning and Environment <p>These discrepancies are not considered a shortcoming as the contact in the WQP that was updated in December 2022 are correct other than minor typographical errors. OFI RW 2022.1 has been raised for these discrepancies.</p> <p>VWST have an incident tracking software that is used to log incidents and track progress of resulting actions as listed in the WQP. VWST provided a copy of the incidents logged during the audit period. There were no water quality incidents in the audit</p>	<p>RSMP Rev 2 -App9-Evac Manual Sept 2019 221216 - DQ-WQP-Rev.10-16Dec22-Complete Darling Quarter Recycling Water Treatment Plant Scheme_Incident_Reporting_Plan- pc_Rev1</p>

Element	Component	Audit findings	Evidence
		<p>period. The 6 incidents raised related to health and safety or equipment damage.</p> <p>The exceedance of the CCP limits discussed under Element 3 were caused by delays in the control and for short time during startup and therefore were not considered to pose a threat water quality, public health or safety.</p> <p>The Water Quality Plan defines water quality incidents to be reported in accordance with the WIC Regulation.</p> <p>Incident notification is discussed further in Section 5. The 2021 audit identified an opportunity for improvement which is discussed in Section 6.</p>	
Element 7 Employee awareness and training	Employee awareness and involvement Employee training	<p>Staff onsite displayed good system understanding and understanding of their role in risk control. All staff are involved in the risk assessment review and update process ensuring that all are aware of the importance of key treatment barriers and operational controls. Key risks are included in the visitor induction form to ensure contractors are aware of key controls,.</p> <p>Staff are aware of the water quality policy and it is on the wall near the entrance for any contractor to see.</p> <p>The following training was undertaken by the Service Engineer during the audit period:</p> <ul style="list-style-type: none"> • Basement emergency procedures • Basement Warden training • Sydney alert procedures • Bomb threat response training • First aid and CPR • Work at heights safely • Enter and work in confined spaces 	Services Engineer Training Records
Element 8 Community involvement and awareness	Community consultation Communication	The only end user is JLL. VWST maintain open communication with JLL including reporting operational issues and submitting monthly reports which include summary of incidents, hazards, WHS issues, water quality, asset management and maintenance.	220430 DQ Monthly Report Veolia April 2022 220731 DQ Monthly Report Veolia July 2022

Element	Component	Audit findings	Evidence
		The website is maintained with system information and policy available to the public. VWST has satisfied the requirement to consult with the end user and educate the community.	
Element 9 Research and development	Investigative studies and research monitoring Validation of processes Design of equipment	The treatment process was validated prior to the audit period with evidence of the validation provided that was consistent with the requirements in the WQP. Revalidation was not required during the audit period. Validation monitoring is undertaken as required, as discussed in Element 5.	
Element 10 Documentation and reporting	Management of documentation and records	VWST demonstrated their BMS intranet system during the video interview which is used for company documentation. It was observed that staff were familiar with the document control systems. The Water Quality Policy opened on BWS was current (updated in December 2022,). Access through VWSTs system to procedures, O&M manual and data spreadsheets was also demonstrated during the audits VWST has demonstrated implementation of the documentation processes included in the WQP.	
	Reporting	VWST have shown they meet their reporting requirements with evidence of two JLL monthly reports and one IPART annual reports provided (network operator and retail supplier). The IPART report was found to meet the requirements of the IPART reporting manual for Network Operators checklist for annual reporting.	220430 DQ Monthly Report Veolia April 2022 220731 DQ Monthly Report Veolia July 2022 2021-22-DQ-NOL-30AUG22 2021-22-DQ-RSL-30AUG22
Element 11 Evaluation and audit	Long-term evaluation of results	Long term data evaluation is undertaken as part of the annual risk assessment review process. Long term operational (SCADA) and lab verification (ALS) data is collected in spreadsheets that can be used for long term trending if required. The monthly reports to JLL also include rolling 12 month trends of treated water quality.	RWTP DQ - Monitoring Master Spreadsheet Process Data from 31-10-21 to 05-01-23 VWT 220430 DQ Monthly Report Veolia April 2022 220731 DQ Monthly Report Veolia July 2022

Element	Component	Audit findings	Evidence
	Audit of recycled water quality management	The planned internal audits were undertaken in 2021 (28 October 2021) and 2022 (19-21 December 2022) and the audit results recorded in the audit reports. Staff including the plant operator and contract manager were involved in the internal audit. Recommendations from the audits are tracked in an improvement log which was provided as evidence. This log shows 2 of the 4 improvements from the 2022 audit are outstanding and all improvements from previous years are complete.	2021 - IA - Darling Quarter – Report 2022 - IA - Darling Quarter – Report IA - Darling Quarter - Improvement Logs
Element 12 Review and continual improvement	Review by senior executive	The WQP is reviewed annually (as detailed in the WQP document control) and senior managers are involved in the risk assessment review (detailed in the risk register document control) and the audits (detailed in the Internal Audit reports). Documents are approved by senior management when relevant for example the risk register and Monthly Report to JLL with their names and the date of review included in the document control. We are satisfied with senior management engagement in the WQP.	221022 - App.6-Darling Quarter Risk Assessment-G.pdf 221022 - App.6-Darling Quarter Risk Assessment-G.xlsx 220430 DQ Monthly Report Veolia April 2022 220731 DQ Monthly Report Veolia July 2022
	Recycled water quality management improvement plan	VWST does not use an improvement plan to track improvements to the system. Maintenance required is tracked in the calibration and maintenance schedule and actions emerging from reviews such as audits are tracked in the incident database. Staff reported that the incident database actions have a person responsible allocated and tracks recommendation status. This process is in line with the WQP. We are satisfied that the required actions are progressed through this system in accordance with the WQP.	

3.3 Monitoring detailed findings

The findings against the Network Operator Licence B8.1, B8.2 and B8.3 are detailed in Table 3-3.

Table 3-3. Audit findings against Network Operator Licence monitoring requirements

Requirement	Finding	Evidence
Clause B8.1 The Licensee must undertake any monitoring that is required for the purposes of this Licence, any Plan, the Act or the Regulation in accordance with this clause.	Critical control point operational monitoring was tested for the audit period, data was collected in line with the CCPs monitoring plan in the WQP (online with 15 minute-interval results recorded in the process spreadsheet). Verification monitoring samples from February 2022 were checked against the sampling plan detailed in the WQP. The correct weekly <i>E. coli</i> tests and monthly BOD5, suspended solids and TDS were undertaken as required by the WQP. VWST have demonstrated that the monitoring in the WQP has been correctly undertaken during the audit period.	RWTP DQ - Monitoring Master Spreadsheet Process Data from 31-10-21 to 05-01-23 VWT
Clause B8.2 The Licensee must keep the following records of any samples taken for monitoring purposes specified in the Water Quality Plan: <ul style="list-style-type: none"> the date on which the sample was taken; the time at which the sample was collected; the point or location at which the sample was taken; and the chain of custody of the sample (if applicable). 	All the Chain of Custody form and the Certificate of Analysis from ALS for samples taken during the audit period were provided as evidence. The form structure includes space for the sample location, date and time. VWST have an SOP for water sample collection which includes details on sample line flushing, sample collection, labelling and collection. Sample forms from February 2022 were reviewed to check implementation of the requirement. Four batches of samples were sent to ALS for analysis in February 2022. All the chain of custody forms were completed and included a sample date and time.	ALS Chain of Custody forms (3, 8, 11, 14 & 24 February 2022 ALS Certificate of Analysis (3, 8, 11, 14 & 24 February 2022, RWTP DQ - Monitoring Master Spreadsheet SOP Water Sample Collection (Rev.1)
Clause B8.3 The Licensee must ensure that analyses of all samples taken for the purposes of Verification Monitoring are carried out by a laboratory accredited for the specified tests by an independent body that is acceptable to NSW Health, such as the National Association of Testing Authorities or an equivalent body. Testing Authorities (NATA) or equivalent, shall carry out all analyses of samples.	VWST engage ALS, a NATA accredited lab to complete their verification analysis. The Chain of Custody form and the Certificate of Analysis from ALS for samples taken during the audit period were provided. The NATA accreditation number is included on the Certificate of Analysis forms. The February 2022 forms was reviewed as an example. VWST has demonstrated that the requirements of this clause have been met.	ALS Chain of Custody forms (3, 8, 11, 14 & 24 February 2022 ALS Certificate of Analysis (3, 8, 11, 14 & 24 February 2022,

3.4 Summary of recommendations

The recommendations made for the Darling Quarter recycled water quality plan are included below:

- Recommendation RW 2022.1: Review delays in CCP alarms and shutdown control and ensure that the CCP table in the Water Quality Plan reflects these delays.
- Recommendation RW 2022.3: Develop a system to measure alarm when CCP limits have been exceeded and the plant is online.

3.5 Summary of opportunities for improvement

A summary of opportunities for improvement for the Darling Quarter recycled water quality plan are detailed below:

- OFI RW 2022.2: Resolve discrepancies between contact lists in the Darling Quarter Recycling Water Treatment Scheme Incident reporting to the Authorities after hours and Appendix 2 of the Water Quality Plan.

4 Infrastructure operating plan audit findings

4.1 Summary of findings

A summary of the infrastructure operating plan audit requirements and the compliance grade is shown in Table 4-1.

Table 4-1. Infrastructure audit requirements

Ref	Requirement	Compliance
WIC Regulation Schedule 1 clause 6(2)(a)	The network operator must ensure that the infrastructure operating plan is fully implemented and kept under regular review and all of the network operator's activities are carried out in accordance with that plan.	Compliant
WIC Reg Sch 1 cl. 8(1)	A water meter connected to a licensee's water main must comply with the requirements of the document entitled the Plumbing Code of Australia, produced for all State governments by Australian Building Codes Board, as in force from time to time.	Compliant
WIC Reg Sch 1 cl. 8(2)	While water is being supplied to premises for which a water meter has been installed, the licensee must ensure (a) the water meter is properly maintained and periodically tested, and (b) the water meter is read at intervals of no more than 4 months, and (c) written notice of each meter reading is sent to the relevant licensed retail supplier.	Compliant
WIC Reg Sch 1 cl. 11	The licensee must not allow a customer's installations to be connected to the licensee's water main unless the installation is code compliant, within the meaning of the Plumbing and Drainage Act 2011.	Compliant

4.1.1 Infrastructure operation plan (WIC Reg Sch 1 cl. 6(2)(a))

VWST has procedures and practices in place that meet the intent of the requirements of the Infrastructure Operating Plan. Maintenance was completed in accordance with the schedule during the audit period. VWST undertake maintenance in accordance with the O&M manual and any additional scheduled maintenance such as instrument calibration is issued to contractors as a purchase on each occasion.

During the site visit it was noted that all equipment maintained by VWST was in good condition. It was however noted that some equipment that was outside of VWST's contract appeared to be less well maintained.

VWST identified longer lead times for reverse osmosis membranes during the audit period and purchased membranes to store onsite. This adjustment to critical spares based on changing global circumstances will reduce the likelihood of downtime of the recycled water plant.

This clause has been graded as compliant.

4.1.2 Customer connections (WIC Reg Sch 1 cl. 8(1),8(2), (11))

VWST only has one customer which is JLL who are responsible for plumbing within the building to each end user. As such most of the requirements under the Plumbing Code of Australia and the *Plumbing and Drainage Act 2011* do not apply.

Inspection of the pipework at the connection to JLL was found to be compliant with the Plumbing Code of Australia and was clearly labelled. Evidence was provided of inspection of backflow prevention and cross connection audit undertaken during the audit period.

These clauses has been graded as compliant.

4.2 Infrastructure operating plan detailed findings

The Infrastructure Operating Plan IOP is built up through a range of documents and workflow practices including:

- Darling Quarter Asset and Maintenance Register
- Darling Quarter Calibration & Equipment Maintenance Schedule
- Standard Operating Procedures (SOPs) and Safe Work Method Statements (SWMS)

The Infrastructure Operating Plan is reviewed and updated following site inspections and audit findings. Version 6 of the IOP dated 7 January 2022 was current during the audit period.

The Asset and Maintenance Register spreadsheet was provided as evidence on 16 February 2023. The spreadsheet includes a register for all equipment VWST are required to operate and maintain under their contract with JLL. The list was reviewed against the piping and instrumentation diagrams and during the site visit. The asset register was found to be comprehensive and included all major equipment.

The RWTP DQ - Monitoring Master Spreadsheet includes templates for weekly and monthly maintenance checks. During the site visit the checklist for February 2023 was sighted and all Week 1 and 2 tasks were completed. Completed weekly/monthly check sheets for July to December 2022 were also provided and all tasks were marked as complete.

The Infrastructure Operating Plan states that scheduled maintenance is set up based on manufacturers recommendations. The Darling Quarter Calibration & Equipment Maintenance Schedule includes calibrations and equipment maintenance with the required frequency, the last date completed, the next due date and the contractor who will undertake the work. At the time of the audit no equipment or instrumentation maintenance was overdue. When the maintenance is due, VWST issue a purchase order to the contractor with the required scope from the O&M manual.

The instrument calibration logs for the audit period were provided as evidence and were all completed in accordance with the schedules.

Critical spares have been identified in the Asset & Maintenance Register. A spare reverse osmosis high pressure pump and sludge pump were observed during the site visit. During the audit period, VWST identified that there was an increase lead time for reverse osmosis membranes and stock of membranes were purchased. These spare membranes were observed during the site visit.

The sodium hypochlorite and sodium hydroxide storage tanks are contained within a second tank which provided secondary containment in case of a leak into the main tank. The operator advised that the outer tank is inspected as part of routine walkarounds and from SCADA trends in the tank level. Checking the integrity of these tanks is included in the weekly/monthly check sheets.

During the audit period the following asset replacements were undertaken:

- Reverse osmosis membranes
- Air compressor replacement

Emails and work orders were provided as evidence of these replacements.

VWST also provided an Asset Renewable Schedule. This schedule had no outstanding replacements. It was noted that a number of major replacements are due in 2023 including the macerator and MBR membranes.

VWST also discuss major asset renewals with JLL. During the interviews a shared drive between VWST and JLL was shown which includes timing and budgets for the major asset renewals

4.3 Customer connections detailed findings

VWST only has one customer which is JLL who are responsible for plumbing within the building to each end user. As such most of the requirements under the Plumbing Code of Australia and the Plumbing and Drainage Act 2011 do not apply.

The following was noted during the site visit:

- Pipework between the treated water tanks and the handover to JLL is lilac PVC pipe with labelling to identify it contains recycled water.
- Pipework has flanged or solvent cement joints and was well supported.
- A mechanical water meter compliant with the Plumbing Code of Australia measures the flow prior to the handover to JLL
- The backflow prevention devices on the backup potable supply were tagged as inspected in June 2022. Reports of this inspection dated 25/6/2022 were also provided
- Evidence of cross connection audit undertaken on 24/12/2022 was provided

VWST has demonstrated that the requirements of these clauses have been met

4.4 Summary of recommendations

No recommendations were made for the Darling Quarter infrastructure operating plan audit.

4.5 Summary of opportunities for improvement

No opportunities for improvement were made for the Darling Quarter infrastructure operating plan audit.

5 Incident notification audit findings

5.1 Summary of findings

A summary of the incident notification audit requirements and the compliance grade is shown in Table 4-1.

Table 5-1. Incident notification audit requirements

Ref	Requirement	Compliance
WIC Regulation Schedule 1 clause 1(2)(a)	A network operator must immediately notify IPART of any incident in the conduct of its activities that threatens, or could threaten, water quality, public health or safety.	No requirement
WIC Regulation Schedule 1 clause 1(2)(b)	A network operator must immediately notify the Minister administering the Public Health Act 2010 of any incident in the conduct of its activities that threatens, or could threaten, water quality, public health or safety.	No requirement
WIC Regulation Schedule 1 clause 1(2)(c)	A network operator must immediately notify the Minister administering Part 2 of the Water Industry Competition Act 2006 (NSW) of any incident in the conduct of its activities that threatens, or could threaten, water quality, public health or safety.	No requirement
WIC Regulation Schedule 1 clause 1(2)(e)	A network operator must immediately notify any licensed network operator or public water utility whose infrastructure is connected to the licensed network operator's infrastructure of any incident in the conduct of its activities that threatens, or could threaten, water quality, public health or safety.	No requirement

5.2 Detailed findings

Incident management and reporting for Darling Quarter is covered by the following three documents:

- Water Quality Plan (Section 12.6, Appendix 1 and 2)
- Darling Quarter – Emergency Response Procedures Manual
- Darling Quarter Recycling Water Treatment Scheme - Incident reporting to the Authorities after hours

VWST provided a copy of the incidents logged during the audit period. There were no water quality incidents in the audit period.

The exceedance of the CCP limits discussed in Section 3.2 were caused by delays in the control and for short times during startup and therefore were not considered pose a threat to, water quality, public health or safety.

5.3 Summary of recommendations

No recommendations were made for the Darling Quarter incident notification audit.

5.4 Summary of opportunities for improvement

No opportunities for improvement were made for the Darling Quarter incident notification audit.

6 Non- compliances from 2021 audit

The non-compliances from the 2021 audit report and observed progress are listed in Table 6-1.

While not in the scope, it was also noted the four opportunities for improvement from the 2021 audit had all been completed.

Table 6-1. 2021 audit non-compliances

Item	Detail
Clause	WIC Reg Sch 1 cl. 7(4)(a)
2021 audit Observation	The implementation of the WQP is considered adequate with the exception of the WQP CCP procedures which do not document the process for managing CCP exceedances that occur during plant shutdown and restart, a recommendation has been made to address this shortcoming. The WQP is up to date and has been reviewed regularly, most recently in August 2021.
IPART guidance	Auditor to check for completion.
Recommendation	Recommendation RW 2021.1: Confirm that high turbidity at CCP1 during plant startup is not caused by MBR membrane integrity failure and update the Water Quality Plan to include the process for CCP breaches during plant start up.
2022 audit findings	VWST have updated the Section 12.2 of the Water Quality Plan with the following: <div data-bbox="507 1055 1460 1890" style="background-color: black; height: 373px; width: 100%;"></div>
Recommendation status	

Appendix A Audit evidence

Document name and number	Version	Date
Darling Quarter Development Network Operator's Infrastructure Operating Plan (DQ-IOP-001-7)	7	5 January 2023
Darling Quarter Development Network Operator's Water Quality Plan (DQ-WQP-001-10)	10	16 December 2022
Darling Quarter Development Retail Suppliers Retail Supply Management Plan (DW-RSMP-001-3)	3	January 2023
Water Quality Policy	n/a	February 2021
DQ - Asset & Maintenance Register.xlsx	n/a	16 February 2023
Calibration & equipment maintenance schedule - DQ.xlsx	n/a	16 February 2023
RWTP DQ - Monitoring Master Spreadsheet.xlsx	n/a	16 February 2023
Process Data from 31-10-21 to 05-01-23 VWT.xlsx	n/a	16 February 2023
ALS certificates of analysis and chain of custody forms	n/a	1 November 2021 to 31 December 2022
Darling Quarter O&M Manual	n/a	20 July 2011
Photographic evidence collected on site visit	n/a	21 February 2023
Darling Quarter Emergency Response Procedures Manual	3.2	5 September 2019
Darling Quarter Recycling Water Treatment Plant Scheme_Incident_Reporting_Plan-pc_Rev1.pdf	n/a	n/a
220819 - SWMS VWT - Buffer Tank Pump Seal Replacement	1	19 August 2022
SOP Chemical Delivery Darling Quarter	1	June 2016
SOP MBR Clean In Place (CIP)	1	June 2016
SOP RO Clean In Place (CIP)	1	June 2016
SOP Sensors Calibration	2	March 2021
SOP Water sample collection	2	March 2021
DQ Chemical list 200413.xlsx	1.2	1 October 2022
WIC Act Annual Compliance Report Network Operator's Licence No 10_008 Financial Year 2021-2022	0	26 August 2022
WIC Act Annual Compliance Report Retail Supplier's Licence No 10_009R Financial Year 2021-2022	0	25 August 2022
Darling Quarter Recycled Water Treatment Plant Monthly Management Report April 2022	1	April 2022
Darling Quarter Recycled Water Treatment Plant Monthly Management Report July 2022	1	July 2022
2022 - Asset Renewable Schedule - Darling Quarter.xlsx	n/a	16 February 2023
221206- Veolia Mail - Shutdown RWTP - Compressor Issue - Darling Quarter (1).pdf	n/a	7 December 2022
220907 - Quote Darling Quarter - RO Membranes Replacement	n/a	7 September 2022

Document name and number	Version	Date
220907 - Veolia Mail - RO Membranes Replacement - DQ	n/a	7 September 2022
220907 - Veolia Mail - RO Membranes Replacement - DQ	n/a	7 September 2022
221206- Veolia Mail - Shutdown RWTP - Compressor Issue - Darling Quarter	n/a	6 December 2022
Specialist Services Agreement Recycled Water Plant Operations and Maintenance Support Services at Darling Quarter	11	July 2018
Monthly and Weekly checks records	n/a	July to December 2022
221230 - Water supply services audit - Wagner Group Services	n/a	30 December 2022
Instrument calibration certificates	n/a	26 May 2022
Internal Audit Report – Darling Quarter – 2022	n/a	13 January 2022
IA - Darling Quarter - Improvement Logs.xlsx	n/a	16 January 2022
210811 BR05-TOOL03 Toolbox Training Record - T. Fougne.docx	n/a	16 January 2022
220323 - Basement Warden Training 2022-2303-ATT	n/a	23 March 2022
SOA TFougne HLTAID011 _17998_4306 - First Aid _ CPR.pdf	n/a	9 May 2022
SOA TFougne RIWHS204E_17998_4163 - Work safely at heights.pdf	n/a	16 March 2022
SOATFO~2.PDF	n/a	16 March 2022
Visitor induction records January 2022 to December 2022	n/a	
BR04-TOOL07 Visitor register 2021 -2022	n/a	16 January 2022
BR18-GU02-TOOL05 Permit to Work August to December 2022	n/a	16 January 2022
Email response form VWST on CCP compliance	n/a	9 March 2023