

Report to the Department of Health by Country Heights Water Pty Ltd for the period 1 July 2023 to 30 September 2023

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1.0 Water Provider Information

Water Provider Contact Details						
Name of Company	Country Heights Water Pty Ltd					
Company Address	PO Box 7584 Cloisters Square Perth WA 6850					
Company Phone	(+61) 449 898 511					
Company Email	admin@countryheightswater.com.au					
Chief Executive Officer	Jerry Goh					
CEO Email	jerry@claymont.com.au					
DoH Liaison Officer	Carel van der Westhuizen Pendragon Environmental Solutions					
DoH Liason Officer Email	carel@pendragonenvironmental.com					

Distribution System

The raw water is pumped through a single filtration train which includes UV sterilisation and reverse osmosis where liquid chlorination will be the final barrier of treatment. The water is not fluoridated. The treated water is then pumped into two 300kL potable water storage tanks, and circulated to maintain free chlorine, and finally pumped into a pressurised water reticulation mains designed in accordance with the requirements of the Water Corporation of Western Australia Design Standard DS 63.

The critical point at the plant is at the treatment train where the pH is adjusted, and chlorine is added. Only free chlorine and pH are monitored after treatment as treatment does not affect any other water quality parameter, as low turbidity water (<0.3NTU) is pumped from a bore drawing water from the Leederville Aquifer, sampled quarterly, having a pH between 6.65 and 7.51 and an Electrical Conductivity between 518 μ S/cm and 576 μ S/cm which equates to a Total Dissolved Solids concentration of between 337 mg/L and 374 mg/L.

With regard to Materials, Products and Substances in contact with Drinking Water (DoH, 2023) and particularly with reference to low lead composition: page 7 of the fact sheet indicates: the transition arrangements for plumbing products with a reduced level of lead commenced in May 2023, components in the bore, plant and reticulation system comprises polyethylene (PE) and Stainless Steel or high-quality brass with no components containing lead. The groundwater pumped into the plant contains <0.001 mg/L Lead.

The filtration system requires regular backwashing to remove materials such as iron precipitates and other impurities, which settle through the carbon filtration media, with the backwashed water pumped to a separate collection tank for further treatment. At regular

maintenance intervals the backwash water tank will be dosed with flocculent, which will settle any solids in the bottom of the tank for later removal. The clear water from the top can then be recycled through the system and sent back to the treatment train.

2.0 Performance Summary

Water Quality Meeting the Drinking Water Guidelines/Minister of Health's Directions						
	Zone 1 ⁽¹⁾ Water Treatment Plant (WTP)					
Microbiological Quality	No Assessed ⁽²⁾	No within Guidelines	Variance ⁽³⁾			
Thermotolerant Coliforms / E.coli	3	3	0			
Amoeba (Thermophilic Naegleria)	3	3	0			
Chemical Quality ⁽⁴⁾						
Chemical – Health Guideline ⁽⁵⁾ including Total Trihalomethanes	1	1	0			
Chemical – Aesthetic ⁽⁶⁾	1	1	0			
Radiological	0	0	0			
	Zo	ne 1 ⁽¹⁾ Display Home	(DH)			
	No Assessed ⁽²⁾	No within Guidelines	Variance ⁽³⁾			
Thermotolerant Coliforms / E.coli	3	3	0			
Amoeba (Thermophilic Naegleria)	3	3	0			

Notes:

- (1) Table may be expanded or collapsed according to the number of zones.
- (2) Number of samples taken for the quarter/year.
- (3) Number of samples that do not comply with the drinking water guidelines.
- (4) Chemical performance is based on the results of the quarter.
- (5) Chemicals tested with a health guideline value refer to Small Community Sampling Grid.
- (6) Chemicals without health guideline values.

3.0 Microbial Performance

3.1 Microbiological - Exception Notifications

Microbiological Water Quality Exceptions										
Region/Scheme/ Zone/Service Provider	Population served	Date	Microbiological Characteristic	Alert Level	Remedial Action	DoH Notified	Close Out Date			
Zone 1 (WTP) and (DH): none										

4.0 Chemical - Health Related Performance

4.1 Chemical - Health Related - Exception Notifications

Health Related Chemical Water Quality Exceptions									
Region/Scheme/Zone/ Service Provider	Population served	Date	Health Related Chemical Characteristic	MoU Alert Level	Remedial Action	DoH Notified	Close Out Date		
1 – none.									

4.2 Chemical – Health Guideline

Zone 1 Country Heights Estate Water Treatment Plant (WTP)									
Health Characteristic	No of Analyses	No of Analyses Complying	% Compliance	Maximum Concentration (mg/L)					
Total Trihalomethanes, THM (0.25mg/L)	3	3	100	0.017					
Sulfate, SO ₄ (500mg/L)	1	1	100	10					
Fluoride, F (1.5mg/L)	1	1	100	<0.01					
Nitrite, as NO ₃ (50mg/L)	1	1	100	<0.01					
Nitrate, as NO ₂ (3mg/L)	1	1	100	0.01					
Antimony, Sb (0.003mg/L)	1	1	100	<0.001					
Arsenic, As (0.01mg/L)	1	1	100	<0.001					
Barium, Ba (0.7mg/L)	1	1	100	0.024					
Boron, B (4mg/L)	1	1	100	<0.05					
Cadmium, Cd (0.002mg/L)	1	1	100	<0.0001					
Copper, Cu (2mg/L)	1	1	100	0.010					
Lead, Pb (0.01mg/L)	1	1	100	0.002					
Manganese, Mn (0.5mg/L)	1	1	100	0.004					
Mercury, Hg (0.001mg/L)	1	1	100	<0.0001					
Molybdenum, Mo (0.05mg/L)	1	1	100	<0.001					
Nickel, Ni (0.02mg/L)	1	1	100	0.010					
Selenium, Se (0.01mg/L)	1	1	100	<0.01					
Silver, Ag (0.1mg/L)	1	1	100	<0.001					
Total Samples Taken	4	All	100	-					

5.0 Chemical - Aesthetic Performance

5.1 Chemical – Aesthetic Guideline

Zone 1 Country Heights Estate Water Treatment Plant (WTP)								
Aesthetic Characteristic	No of Analyses	No of Analyses Complying	% Compliance	Maximum Concentration (mg/L)				
pH (6.5 – 8.5)	1	1	100	7.1				
Total Dissolved Solids, TDS (600mg/L)	1	1	100	293				
Sulfate, SO ₄ (250mg/L)	1	1	100	10				
Total Hardness (as CaCO ₃ ; 200mg/L	1	1	100	46				
Turbidity (5NTU)	1	1	100	0.2				
Ammonia, NH ₃ (0.5mg/L)	1	1	100	0.09				
Aluminium, Al (0.2mg/L)	1	1	100	<0.01				
Iron, Fe (0.3mg/L)	1	1	100	<0.05				
Zinc, Zn (3mg/L)	1	1	100	0.068				
Total Samples Taken	1	All	100	-				

5.2 Chemical - Aesthetic - Incident Specific Information

5.2.1 Zone 1 Country Heights Estate Water Treatment Plant (WTP) and Display Home (DH)

No incidents to report.

6.0 Radiological Performance

6.1 Radiological - Exception Notifications

Radiological Water Quality Exceptions											
Zone	Population served	Date	Radiological Characteristic	Alert Level	Remedial Action	DoH Notified	Close Out Date				
1 - none											

6.2 Radiological Performance

Zone 1 Country He	Zone 1 Country Heights Estate Water Supply Bore CEPB1)								
Country Heights Water undertakes radiological monitoring once a year during the January Quarter: this sample was taken in February 2023.									
Radiological Characteristic	No of Analyses	No of Analyses Complying	% Compliance	Max Value (Bq/L)					
Gross Alpha (0.5)	1	1	100	<0.05					
Gross Beta (0.5)	1	1	100	0.26					
Bq/L is Becquerels/Litre.									

7.0 Planned Sample Summary

Zone	Mi	crobiologic	cal	Chemical			Radiological		
Zone	Planned	Taken	% Taken	Planned	Taken	% Taken	Planned	Taken	% Taken
Zone 1 (WTP) and	3	3	100	1	1	100	0	0	0
Zone 2 (DH)	3	3	100						

Fluoridation of drinking water is not undertaken; hence no sampling will be undertaken.

7.1 Planned Sample Exceptions

Planned Sample Exceptions									
Zone Sampling Date Point Due			Characteristic (Microbiological/Chemical/ Radiological)	Reason for missed sample					
None.									

8.0 General Notes

(This section can include reference to specific programs for maintenance, new additions to the scheme supply or report format or discussion on ongoing problems).

8.1 General Notes

Country Heights Water Pty Ltd adheres strictly to the Guidelines and Regulations of the Department of Health Department WA (DoH) to ensure the safety and health of consumers at the Country Heights Estate are not compromised. The steps we take to treat and disinfect and ensure the drinking water we provide is safe, include targeting microorganisms, as explained below, and implementing recognised industry practices as remedial efforts to combat any of these microorganisms in the potable water we provide and accordingly implement routine monitoring, sampling and analytical testing to ensure our practices are effective and safe.

Micro-organisms (or microbes) are microscopic living organisms, occurring naturally in our environment, in air, soil and in water bodies; some are beneficial, but some may impact human health. Pathogens (pathogenic micro-organisms) are micro-organisms that cause disease or illness; the most common and widespread health risk to humans is associated with drinking water contaminated by pathogens. Organisms associated with faecal matter from humans or other mammals cause several waterborne diseases. It is impossible to test for the presence of all pathogens that may be present in water. The Australian Drinking Water Guidelines recommend testing for the presence of *Escherichia coli (E. coli)* as an indicator of faecal pathogen contamination. The Australian Drinking Water Guidelines state that *E. coli* should not be present in a minimum 100mL sample of drinking water. Thermophilic *Naegleria* refers to a group of common water borne *amoebae* which includes *Naegleria fowleri*, an environmental pathogen living in fresh warm water, and the organism that causes primary amoebic meningoencephalitis, a serious condition, which requires prompt medical treatment to prevent secondary brain damage, neurological (nerve) disorders, or coma.

Country Heights Water Pty Ltd will immediately notify the DoH of any confirmed detection of *E. coli* or Thermophilic *Naegleria* in any microbiological analysis of a sample of water.

8.2 Compliance with Water Services Licence and Water Source Protection Plan

8.2.1 Water Services Licence

The Economic Regulation Authority of WA (ERA) issued a Water Services Licence in terms of the Water Services Act 0f 2012 to:

Licensee Name: Athena Water Solutions Pty Ltd (ABN 72 624 317 746)

Licence Number: WL49

Commencement Date: 21 November 2018

Version Number: 1

Version Date: 21 November 2018 Expiry Date: 20 November 2043

Operating Area: Plan OWR-OA-313 (Lot 1 Cheriton Road known as Country Heights Estate).

This licence and financial hardship policy was amended to reflect a change of name from Athena Water Solutions Pty Ltd to Country Heights Water Pty Ltd by the ERA (Reference: D244536 dated 30 March 2022) in accordance with section 18 of the Water Services Act 2012 and in accordance with clause 29 of the Water Services Code of Conduct (Customer Service Standards) 2018 respectively.

Licensee Name: Country Heights Water Pty Ltd (ABN 72 624 317 746)

Licence Area: OWR-OA-313 (A), (Lot 1 Cheriton Road known as the Country Heights Estate).

Licence Number: WL49

Commencement Date: 21 November 2018

Version Number: 3

Expiry Date: 20 November 2043

Country Heights Water Pty Ltd acts strictly in accordance with this licence. Under Reference D246925 dated 26 May 2022, the ERA granted an extension of the 2022 operational audit and asset management system review to cover the period 21 November 2018 to 30 November 2023, with the report to be provided to the ERA by 28 February 2024. These documents are currently being developed.

8.2.2 Water Source Protection Plan

The Country Heights Estate Water Reserve Drinking Water Source Protection Plan for the Country Heights Estate Water Supply, Gingin, prepared by KCTT in 2017 was endorsed by the then Department of Water, now the Department of Water and Environmental Regulation, under Reference WT12963 dated 7 April 2017.

The Drinking Water Source Protection Plan (DWSPP) was prepared to assess the risks to water quality within the Country Heights Estate Water Reserve and to recommend management strategies to avoid, minimise and manage those risks. The primary water quality protection measures include:

- The proclamation of the boundary of the Country Heights Estate Water Reserve in accordance with the Country Areas Water Supply Act 1947. The private land in the compound (water reserve) will be managed for priority 1 (P1) water source protection.
- Approval and recognition of the water reserve and P1 area within the Shire of Gingin's local planning scheme and other applicable strategies.
- Best Management Practices implementation, including construction of the bore (CEPB 1 drilled 276m into the confined Leederville Aquifer) in accordance with the Minimum Construction Requirements for Water Bores in Australia (3rd Edition) (National Water Commission 2012).

Since the bore is within a confined aquifer there is no need for a Well Head Protection Zone (WHPZ). The effective protective boundary is the extent of the bore compound which also includes the Water Treatment Plant. The compound is locked and gated with a 1.8m high chain link security fence.

To minimise the risk of pollution as required by the Health Act (Underground Water Supply) Regulations 1959 administered by the Department of Health, no soak-wells or any other probable sources of pollution are to be within 30m of the compound boundary. Where this impacts proposed private allotments, a caveat is placed on these lots preventing any such structures to be built in this zone.

Country Heights Water undertakes regular inspections to monitor the orderly working of the system and to check on nuisance issues such as vandalism. The maintenance and surveillance of the Water Treatment Plant is in accordance with the approved Management Plan.

Owing to the confinement of the aquifer, there is a minimal risk of contamination to the water source through application of agricultural nutrients and chemicals in the area. In addition to the significant depth and construction of the bore, the interbedded nature of the Leederville Formation, comprising impermeable clays and shales, in the area also reduces the risk of contamination to the groundwater resource by inhibiting vertical infiltration and migration. Earth work levels at the Estate will be set such that there is no ponding of surface water around the Water Treatment Plant and Bore/Well Head, with all surface waters to be diverted away from the Water Treatment Plant compound.

The DWSPP satisfies the requirements of the Department of Water and Environmental Regulation in line with the Department's commitment to continuous protection of this drinking water source to meet public health requirements and ensure the supply of a reliable, safe, good quality drinking water for all consumers in the subject and surrounding areas.

The Australian Drinking Water Guidelines recommend a *multiple barrier catchment to consumer* approach to protect public drinking water sources which this DWSPP is consistent with. Catchment protection is the first barrier against contamination, with subsequent barriers implemented at the water storage, treatment, and distribution stages of a water supply system.

Catchment protection requires an understanding of the catchment and the hazards and hazardous events that can compromise drinking water quality. This understanding enables the development of preventative strategies and operational controls to ensure the safest possible water supply to consumers. In essence, in view of the above discussions, the Drinking Water Source within the Country Heights Estate is not considered under influence from surface land uses and therefore not susceptible to contamination.

The following best management procedures is employed to provide guidance to residents and visitors of the importance of the area as a public drinking water source:

- Fencing, inclusive of secure gating to the bore compound and water treatment plant, key to the protection of the Water Treatment Plant, the bore and the other important infrastructure items contained within the compound, coupled with signage of the compound, showing the name of the Water Reserve and the Water Service Provider and their emergency contact details.
- Bore construction to the Minimum Construction Requirements for Water Bores in Australia (National Water Commission, February 2012).
- No water source contaminants within 30m of the bore compound, such as soak-wells, pesticides, and/or other potential pollution to the water source which is a legislative requirement by the Department of Health (Health Act Underground Water Supply Regulations, 1959).
- The proclamation of the Country Heights Estate Water Reserve provided the necessary basis to allow future and existing by-laws to protect water quality in the Country Heights Estate. The proclamation is in accordance with the Country Areas Water Supply Act, 1947.
- By-law enforcement and surveillance throughout the Country Heights Estate, a critical component in the maintenance and protection of water quality.

Emergency Response:

Contamination of water may occur because of unforeseen incidents and the use of chemicals during emergency response scenarios. The Shire of Gingin's Local Emergency Management Committee was notified and made familiar with the location, a locality plan was provided, and purpose of the Country Heights Estate Water Reserve. Country Heights Water have an advisory role in any Hazardous Materials incidents in, or near to, the Country Heights Estate Water Reserve. A map of the Country Heights Estate Water Reserve is available to all personnel who deal with any hazardous materials within the water reserve. All personnel working within the water reserve is aware of the importance of protection of the water quality in this area.

The following measures obtained from the Water Source Protection Plan were implemented and are being maintained (note the relevant stakeholder in terms of implementation is indicated in brackets at the end of each).

- The boundary of the compound for bore CEPB1 was proclaimed as the Country Heights Estate Water Reserve under the Country Areas Water Supply Act 1947 (Department of Water, Proponent, and Country Heights Water).
- 2) The Country Heights Estate Water Reserve is recognised in the Shire of Gingin Local Planning Scheme No 9 in accordance with the WAPC State Planning Policy No 2.7 Public Drinking Water Source Policy 2003. (Shire of Gingin and Country Heights Water).
- 3) Water source protection strategies identified in the DWSPP, in conjunction with the management objectives, operating rules, monitoring provisions and contingency plans nominated in the Groundwater Licence Operating Strategy (GLOS, Rockwater Pty Ltd, August 2015). (Country Heights Water). An Annual Groundwater Summary is submitted to DWER.
- 4) Maintain surveillance over the Country Heights Estate Water Reserve, with any non-conforming land-uses to be identified and referred to the Department of Water and Environmental Regulation for assessment. (Country Heights Water). There were no non-conforming land uses to date.
- 5) Bore CEPB1 was constructed in accordance with the Minimum Construction Requirements for Water Bores in Australia, Edition 3 (National Water Commission, 2012) (Country Heights Water).
- 6) All emergency incidents that occur in the Country Heights Estate Water Reserve will be addressed (ongoing) by ensuring that:
 - a. The Shire of Gingin Emergency Management Committee is aware of the location and purpose of the water reserve.
 - b. The area of the water reserve is provided in plan format to the Department of Fire and Emergency Services.
 - c. Country Heights Water play an advisory role during any reported incidents in the Country Heights Estate Water Reserve. (Claymont Developments, Country Heights Water).
- 7) Fencing, secured gating and appropriate signage are placed on the boundary of the Country Heights Estate Water Reserve compound; these are maintained in an appropriate standard such that the fencing is continuous, has a consistent integrity to limit unintended access and the signage is legible with up-to-date contact details for emergency purposes (Country Heights Water).
- 8) Appropriate information relating to the importance of the Country Heights Estate Water Reserve is provided to future residents/landowners in the Country Heights Estate. This is included in all

information provided to prospective purchasers with a copy of the Customer Water Agreement for the provision of water services in the Country Heights Estate. (Claymont Developments, Country Heights Water).

- 9) A final version (Revision I, April 2017) of the Country Heights Estate Water Reserve Drinking Water Protection Plan including Figure 2 depicting the water reserve endorsed by the Department of Water and Environmental Regulation is available on the Country Heights Water website. An electronic copy of this plan was made available to the Department of Water for their records. (Claymont Developments and Country Heights Water). Other documents on the website include the Water Services Licence (ERA WL49, Version 2, 1 May 2020), Operating Area Map and Memorandum of Understanding with the Department of Health dated 30 November 2020.
- 10) The Country Heights Estate Water Reserve Drinking Water Source Protection Plan will be revisited and updated within 5 years, or earlier if required. (Claymont Developments and Country Heights Water). The first revision is due April 2023.

8.2.3 Radiological Sampling

Samples of water were obtained on the 20th of February 2023 and submitted to ALS Environmental Laboratories for determination of Gross Alpha and Beta Activity.

Gross Alpha was measured at <0.05 Bq/L and Gross Beta Activity (40K) at <0.10 Bq/L both below their laboratory limits of reporting and below the Australian Drinking Water Quality Guidance Levels for drinking water at 0.5 Bq/L for Gross Alpha and 0.5 Bq/L for Gross Beta (excluding K40 activity).

8.2.4 Broad Pesticide Scan

Samples of water were obtained on the 21st of June 2023 and submitted to ALS Environmental Laboratories for a broad pesticide screen:

Zone 1 Country Heights Estate Water Treatment Plant (WTP)								
Health Characteristic: Pesticides	No of Analyses	No of Analyses Complying	% Compliance	Maximum Concentration (µg/L)				
Dithiocarbamates as Carbons Disulfide: Metham-sodium	1	1	100	<0.2				
Phenoxyacetic Acid Herbicides: Dicamba, MCPA, 2.4-D, Triclopyr, Picloram and Clopyralid	1	1	100	<0.01				
Glyphosate and AMPA	1	1	100	<10				
Quaternary Ammonium Herbicides: Paraquat and Diquat	1	1	100	<0.05				
Sulfonylurea Herbicides: Metsulfuron Methyl	1	1	100	<0.10				
Triazoles: Amitrole	1	1	100	<0.10				

Zone 1 Country Heights Estate Water Treatment Plant (WTP)						
Health Characteristic: Pesticides	No of Analyses	No of Analyses Complying	% Compliance	Maximum Concentration (µg/L)		
Phenolics and Related Compounds: Pentachlorophenol and Dalapon	1	1	100	<0.10		
Total Samples Taken	1	All	100	-		

Pesticides were not detected.

8.2.5 Per- and Polyfluorinated Substances (PFAS)

PFAS are a large, complex group of manufactured chemicals that are ingredients in various everyday products. For example, they are used to keep food from sticking to packaging or cookware, make clothes and carpets resistant to stains and water, and create a more effective foam for firefighting. PFAS are used in industries such as aerospace, automotive, construction, and electronics.

PFAS molecules have a chain of linked carbon and fluorine atoms. Because the carbon-fluorine bond is one of the strongest, these chemicals do not degrade easily in the environment and are highly mobile. Multiple health effects associated with PFAS exposure have been identified and are supported by different scientific studies. Concerns about the public health impact of PFAS have arisen for the following reasons:

- Widespread occurrence. Studies find PFAS in the blood and urine of people, and scientists want to know if they cause health problems.
- Numerous exposures. PFAS are used in hundreds of products globally, with many opportunities for human exposure.
- Growing numbers. More than 9,000 PFAS have been identified.
- Persistent. PFAS remain in the environment for an unknown amount of time.
- Bioaccumulation. People may encounter different PFAS chemicals in various ways. Over time, people may take in more of the chemicals than they excrete, a process that leads to bioaccumulation in bodies.

Research conducted to date reveals possible links between human exposures to PFAS and adverse health outcomes. These health effects include altered metabolism, fertility, reduced foetal growth and increased risk of being overweight or obese, increased risk of some cancers, and reduced ability of the immune system to fight infections. While knowledge about the potential health effects of PFAS has grown, many questions remain unanswered with further investigation and research continuing.

Investigations into the presence and extent of PFAS in groundwater in the Leederville Aquifer is currently underway (e-mail correspondence with the Department of Water and Environmental Regulation and the Water Corporation).

Samples of groundwater were obtained on the 16th of March 2023 and submitted to ALS Environmental Laboratories for determination of Perfluoroalkyl Sulfonic Acids, Perfluoroalkyl Carboxylic Acids,

Perfluoroalkyl Sulfonamides, Fluorotelomer Sulfonic Acids and Sums of PFAS; these substances were all below their PFAS Super Ultra Trace Levels, hence are absent in groundwater at the Country Heights Estate.

Zone 1 Country Heights Estate Water Treatment Plant (WTP)						
Health Characteristic: PFAS Substances	No of Analyses	No of Analyses Complying	% Compliance	Maximum Concentration (mg/L)		
Sum of perfluorooctane sulfonate (PFOS) and perfluorohexane sulfonate (PFHxS); 0.07µg/L	1	1	100	<0.0002		
Perfluorooctanoic acid (PFOA); 0.56µg/L	1	1	100	<0.0002		
Total Samples Taken	1	All	100	-		

Notes:

The Australian Drinking Water Guidelines (ADWG) are available from:

https://www.nhmrc.gov.au/about-us/publications/australian-drinking-water- guidelines.

DoH currently uses Version 3.7 (DoH, January, 2023).

DoH currently considers implementing Version 3.8 published in September 2022.

The DoH Fact Sheet Materials, Products and Substances in contact with Drinking Water, May 2023 is available from:

https://www.health.wa.gov.au/~/media/Files/Corporate/general-documents/water/PDF/MaterialsSubstancesDrinkingWater.pdf