

## Dial-A-Dump (EC) Pty Ltd (the Licensee of EPL 13426) Response to Final Compliance Audit Report<sup>1</sup>

### Table 6 Action Program (Page 62 of Final Compliance Audit Report)<sup>2</sup>

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
1	EPL condition L1.3 (Pollution of waters) Maintenance of Appropriate Freeboard Maintenance of Depth Indicators	From our review of the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, the Licensee considers it has complied with this Action Item.	Closed	None Required
2	EPL conditions L2.1/L2.2 (Concentration Limits) Concentration limits - EPA ID Point 5 & 6 - Water and/or Land Concentration Limits	We have reviewed the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, and the Licensee provides the following:	The Licensee will continue to undertake all practical measure to avoid or minimise water pollution.	None Required

<sup>1</sup> Final Compliance Audit Report was provided to the Licensee on 29 March 2019 (Audit No: 1577866) (Version downloaded from EPA website 19.07.2019).

<sup>2</sup> Glossary:

**EPA Comments** means the comments made by the EPA under the column headed "Target/Action Date" of "Table 6 Action Program" in Section 4 on page 62 of Final Compliance Audit Report.

**EPA Additional Comments** means the comments made by the EPA in "Attachment A" of Appendix C to the Final Compliance Audit Report.

**Licensee Table 3 Comments** means the comments made by the Licensee under the column headed "Licensee Comments" on "Table 3", "Table 4" or "Table 5" of Appendix B to the Final Compliance Audit Report.

**Licensee Table 6 Comments** means the comments made by the Licensee under the column headed "Licensee Comments" of "Table 6 Action Program" in Section 7 of Appendix B to the Final Compliance Audit Report.

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		<ul style="list-style-type: none"> <li>• all practical measure to avoid or minimise water pollution have been undertaken, including:                             <ul style="list-style-type: none"> <li>○ the development of a maintenance program for desilting dams;</li> <li>○ fortnightly monitoring and maintenance;</li> <li>○ fortnightly iAuditor turbidity testing;</li> <li>○ an iAuditor drain maintenance and inspection program;</li> <li>○ a planned installation of pods;</li> <li>○ quarterly pump out of drainage and first flush systems;</li> <li>○ annual desilting of dams, and</li> </ul> </li> <li>• following Bingo’s purchase of the Licensee, Bingo is currently undertaking a comprehensive review and update of:                             <ul style="list-style-type: none"> <li>○ the non-operational onsite environmental compliance checklists (<b>Checklist Review</b>); and</li> <li>○ the Environment Management Strategy and its associated management plans (<b>Annual EMS Review</b>).</li> </ul> </li> </ul>		

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		<p>It is further noted that:</p> <ul style="list-style-type: none"> <li>• the water used in the dams is used for dust control;</li> <li>• modification 7 to the Major Project 06_0139 approval has been submitted to the Department of Planning and Environment (<b>DPE</b>) seeking consent to the upgrading of the surface water storage and management system on the Premises;</li> <li>• a member of staff is employed on a permanent basis as the Site Project Manager (<b>SPM</b>); and</li> <li>• a member of staff is employed on a permanent basis as the onsite Environmental Officer.</li> </ul>		
3	EPL condition L3.1 (Waste) Receival of waste not permitted by the licence	From our review of the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, the Licensee considers it has complied with this Action Item.	Closed	Clinical Waste Tool Box Talk dated June 2019 ( <b>Attachment 1</b> ).  Other information was provided to the EPA on 25 March 2019.
4	EPL condition L3.4 (Waste) Disposal of waste offsite	We have reviewed the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, and the Licensee provides the following:	Closed	The details of the receiving facility and the amount of waste transported have been entered into the EPA's Online Waste Tracking portal by the Licensee.

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		<ul style="list-style-type: none"> <li>• the Licensee has entered the details of the destination facility and the amount of waste transported into the EPA's Online Waste Tracking portal;</li> <li>• the Licensee's contractual arrangement is with the transporter not the destination facility and the final use of the material at the destination facility is determined by the entity in control of that facility;</li> <li>• records of the final use of the material at the destination facility are contractually not available to the Licensee;</li> <li>• it is the intention of the Licensee that the material is transported to destination facility for resource recovery purposes; and</li> <li>• currently no waste is being transported off site for landfilling.</li> </ul>		<p>Other records were provided to the EPA on 25 March 2019.</p> <p>The previous movement of waste was in accordance with the originally approved Environmental Management Strategy dated November 2011.</p>
5	EPL condition L3.5 (Waste) Disposal of waste not permitted by the licence	From our review of the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, the Licensee considers it has complied with this Action Item.	Closed	Refer to comment provided for Action Item 3 above.
5A	EPL condition L5.1 (Hours of Operation) Hours of operation – Landfill	We have reviewed the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, and the Licensee provides the following:	Closed	None Required

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		<ul style="list-style-type: none"> <li>• modification 6 to the Major Project 06_0139 approval has been submitted to the DPE seeking consent to extend landfill operations to 5am to 9pm; and</li> <li>• the EPA lodged a submission in response to the public exhibition of the modification 6 application.</li> </ul>		
6	<p>EPL condition L5.2 (Hours of Operation)</p> <p>Hours of operation – Conveyor and chute system</p>	<p>From our review of the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, and the Licensee provides the following:</p> <ul style="list-style-type: none"> <li>• modification 6 to the Major Project 06_0139 approval has been submitted to the DPE seeking consent to extend site operations to 24 hours;</li> <li>• chute and conveyor dockets are manually entered;</li> <li>• the time of the manual entry is electronically determined and automatically generated at the time that manual entry is made;</li> <li>• the time of the manual entries of the chute and conveyor are therefore not reflective of the times of operation of the facilities under EPL 20121 and EPL 13426; and</li> <li>• the “in-time” and “out-time” noted within the relevant records indicates</li> </ul>	Closed	None Required

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		the time of that manual data entry and is not referable to the time of operation of the conveyor and chute system.		
7	EPL condition O2.1(a) (Maintenance of plant and equipment) Maintenance of in-pit-dam	From our review of the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, the Licensee considers it has complied with this Action Item.	Closed	New boat resting at side of in-pit dam ( <b>Photo 1</b> ). In-pit dam clear of litter, rubbish and sunken dinghy ( <b>Photo 2, 3 &amp; 4</b> ).
8	EPL condition O4.2(b) (Processes and management) Effectiveness of pests and noxious weed management	We have reviewed the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, and the Licensee provides the following: <ul style="list-style-type: none"> <li>• Photo 4a in Table 3 of the Final Compliance Audit Report is not noxious pampas grass;</li> <li>• the Pest, Vermin Feral Animals and Declared Noxious Weeds EMS is being updated to address the issues raised in the EPA Additional Comments as part of the Licensee's Annual EMS Review; and</li> <li>• the duty and control requirements under the <i>Biosecurity Act 2015 (NSW)</i> are being considered as part of the Licensee's Annual EMS Review; and</li> </ul>	In accordance with the conditions of the Major Project 06_0139 approval, and as part of the Checklist Review and Annual EMS Review, the Licensee will: <ul style="list-style-type: none"> <li>• updated the Pest, Vermin Feral Animals and Declared Noxious Weeds EMS to the satisfaction of the DPE;</li> <li>• implement the Pest, Vermin Feral Animals and Declared Noxious Weeds EMS; and</li> </ul>	Progress of in pit weed control ( <b>Photo 5 &amp; 6</b> ).

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		<ul style="list-style-type: none"> <li>measures adopted for the zone in the Pest, Vermin Feral Animals and Declared Noxious Weeds EMS have been adopted across the entire premises.</li> </ul>	<ul style="list-style-type: none"> <li>upload the Pest, Vermin Feral Animals and Declared Noxious Weeds EMS to the Licensee's website.</li> </ul>	
9	EPL condition O5.4(a)(i) (Covering of Waste)  Covering Waste	<p>We have reviewed the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, and the Licensee provides the following:</p> <ul style="list-style-type: none"> <li>waste is and will continue to be covered in accordance with EPL.</li> </ul>	The Licensee will continue to cover waste in accordance with EPL.	<p>Tool Box Talks and site meetings are held regularly with the operational onsite staff informing them of conditions of the EPL.</p> <p>Virgin Excavated Natural Material (VENM) applied (<b>Photo 7, 8 &amp; 9</b>).</p>
10	EPL condition O5.4 (a)(ii) (Covering of Waste)  Alternative Cover	<p>From our review of the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, and the Licensee provides the following:</p> <ul style="list-style-type: none"> <li>conditions O5.5 and O5.6 have been added to the latest version of the EPL (version 7 June 2019) approving the use of 'ConCover' as an alternative daily cover.</li> </ul>	Closed	None Required
11	EPL condition O5.9 (Waste management)	We have reviewed the EPA Comments, the Licensee Table 3 Comments, the Licensee	Closed	Refer to comment provided for Action Item 4 above.

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
	Disposal of waste in landfill void	Table 6 Comments and the EPA Additional Comments, and the Licensee refers to comment provided for Action Item 4 above.	Refer to comment provided for Action Item 4 above.	
12	EPL condition O5.10 (Waste management) Filling plan	From our review of the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, the Licensee provides the following: <ul style="list-style-type: none"> <li>the Filling plan was updated; and</li> <li>the Filling plan was provided to the EPA on 25 March 2019.</li> </ul>	Closed	None Required
13	EPL condition O6.6 (Other operating conditions) Storage of chemicals	From our review of the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, the Licensee considers it has complied with this Action Item.	Closed	Liquid storage unit ( <b>Photo 10</b> ).
14	EPL conditions M2.1 – M2.2 (Requirement to monitor concentration of pollutants discharged) (scope 2 March 2017 to 21 August 2018) Monitor at each monitoring/discharge point	We have reviewed the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, and the Licensee provides the following: <ul style="list-style-type: none"> <li>Monitoring points BH10d and BH12d have been replaced by BH25d and BH26d; and</li> <li>following Bingo's purchase of the Licensee, Bingo is currently undertaking a comprehensive review</li> </ul>	The Licensee will apply for a variation to the EPL.	None Required



Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		of the EPL monitoring points and plans ( <b>Monitoring Points Review</b> ).		
14A	EPL conditions M2.1 – M2.2 (Requirement to monitor concentration of pollutants discharged)  (scope 22 August 2018 to 17 December 2018) Frequency	We have reviewed the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, and the Licensee provides the following: <ul style="list-style-type: none"> <li>• hydrosleeves have been installed to prevent further blocking of monitoring BHs; and</li> <li>• the frequency of monitoring for the parameters Zinc, Total Organic Carbon and Ammonia are being reviewed as part of the Monitoring Points Review.</li> </ul>	Where agreed, the Licensee will apply for a variation to the EPL.	Refer to Table A below which compares the monitoring points and frequencies between the EPL variations dated 06 October 2015, 22 August 2018 and 07 June 2019. Table A indicates that the frequency of monitoring does not correspond with that the frequency reported by the EPA in Table 3 of the Final Compliance Audit Report.
15	EPL condition M3.1 (Testing methods - concentration limits)  (Scope 22 August 2018 to 17 December 2018) Methods of analysis	We have reviewed the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, and the Licensee provides the following: <ul style="list-style-type: none"> <li>• written confirmation has been received from the Licensee's laboratory that the Approved Methods are no longer valid for a laboratory to maintain NATA accreditation; and</li> <li>• the EPA Methods reference APHA1998 whereby the current NATA approved edition is dated 2017;</li> </ul>	Closed	Written confirmation from the Licensee's laboratory dated 26 June 2019 was included in the Licensee's response to the Final Compliance Audit Report emailed to Mr Winston Wickremeratne of the EPA on 1 July 2019.

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		<ul style="list-style-type: none"> <li>• Envirolab (the Licensee's laboratory) is following the NATA accredited methods; and</li> <li>• it is the Licensees understanding that EPA is in direct contact with the Licensee's laboratory regarding the Approved Methods.</li> </ul>		
16	EPL condition M7.4 (Other monitoring and recording conditions) Monitoring leachate levels	From our review of the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, the Licensee considers it has complied with this Action Item.	Closed	None Required
17	EPL condition R2.1 (Notification of environmental harm) Notification of environmental harm	From our review of the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, the Licensee considers it has complied with this Action Item.	Closed	None Required
18	EPL conditions E4.1(a), (d) & (e) (Approved alternative daily cover specification – particulate waste materials) Alternative cover specifications	We have reviewed the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, and the Licensee reinstates what was included in the, the Licensee Table 3 Comments, and provides the following: <ul style="list-style-type: none"> <li>• the Licensee notes condition E4.1(a) and will continue to monitor compliance with the daily cover</li> </ul>	Closed	None Required

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
		<p>requirements in the relevant site checklists; and</p> <ul style="list-style-type: none"> <li>the statements made in the EPA Additional Comments are not consistent with the specifications approved in the Technical Specification for DADI Landfill Leachate Management Contingency Systems PSM1034-003S, June 2017” (the Technical Specification) (EPA DOC18/584994).</li> </ul>		
19	<p>Section 153F of the <i>Protection of the Environment Operations Act 1997</i> (NSW) (<b>POEO Act</b>) (Implementation of PIRMP)</p> <p>Implementation of plan</p>	<p>We have reviewed the EPA Comments, the Licensee Table 3 Comments, the Licensee Table 6 Comments and the EPA Additional Comments, and the Licensee provides the following:</p> <ul style="list-style-type: none"> <li>the PIRMP has been reviewed and updated and addresses the issues raised in the EPA Additional Comments; and</li> <li>a test of the updated PIRMP was conducted on 22 February 2019.</li> </ul>	Closed	<p>Following Bingo’s purchase of the Licensee, Bingo has the in-house expertise to update the PIRMP.</p> <p>EPIRMP – Site Specific 017 (<b>Attachment 2</b>)</p> <p>EPIRMP v06 29 June 2019 Generic (<b>Attachment 3</b>)</p> <p>EPIRMP – Site Specific website (<b>Attachment 4</b>)</p>
20	<p>Regulation 98C(1)(b) of the <i>Protection of the Environment Operations (General) Regulation 2009</i> (<b>POEO Regs</b>) (Additional</p>	<p>We have reviewed the EPA Comments, the Licensee Table 3 Comments and the Licensee Table 6 Comments, and the Licensee provides the following:</p>	Closed	None Required

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
	<p>matters to be included in PIRMP)</p> <p>Likelihood of such hazards occurring</p>	<ul style="list-style-type: none"> <li>the PIRMP has been reviewed and updated and addresses the issues raised in the EPA Additional Comments; and</li> <li>the relevant sections and information of the PIRMP have been uploaded to the Licensee's website.</li> </ul>		
21	<p>Regulation 98C(1)(d) of the POEO Regs (Additional matters to be included in PIRMP)</p> <p>Inventory of potential pollutants</p>	Refer to comment provided for Action Item 19 & 20 above.	Closed	Refer to comment provided for Action Item 19 above.
22	<p>Regulation 98C(1)(k) of the POEO Regs (Additional matters to be included in PIRMP)</p> <p>Detailed map</p>	Refer to comment provided for Action Item 19 & 20 above.	Closed	Refer to comment provided for Action Item 19 above.
23	<p>Regulation 98C(1)(m) of the POEO Regs (Additional matters to be included in PIRMP)</p> <p>Staff training program</p>	Refer to comment provided for Action Item 19 & 20 above.	Closed	Refer to comment provided for Action Item 19 above.
24	<p>Regulation 98C(1)(n) of the POEO Regs (Additional</p>	Refer to comment provided for Action Item 19 & 20 above.	Closed	Refer to comment provided for Action Item 19 above.

Action Item	Compliance Requirement	Licensee Comment	Status/Actions	Supporting Material
	matters to be included in PIRMP) Dates the plan was tested			
25	Regulation 98C(1)(p) of the POEO Regs (Additional matters to be included in PIRMP) Testing and maintaining the Plan	Refer to comment provided for Action Item 19 & 20 above.	Closed	Refer to comment provided for Action Item 19 above.
26	Regulation 98E (1) & (2)(a) of the POEO Regs (Testing of PIRMP) Testing the plan	Refer to comment provided for Action Item 19 & 20 above.	Closed	Refer to comment provided for Action Item 19 above.

Table A – Monitoring Points and Frequency

Pollutant	EPL dated 06 October 2015	EPL dated 22 August 2018	EPL dated 07 June 2019
<b>Monitoring Point 2 &amp; 3</b>			
Ammonia	Quarterly	Quarterly	Quarterly
Total organic carbon	Quarterly	Quarterly	Quarterly
Zinc	Quarterly	Quarterly	Quarterly
<b>Monitoring Point 5 &amp; 6</b>			
Ammonia	Special Frequency 1	Special Frequency 1	Special Frequency 1
Total organic carbon	Special Frequency 1	Special Frequency 1	Special Frequency 1
Zinc	N/A	N/A	N/A
<b>Monitoring Point 7 &amp; 9 - 27</b>			

Ammonia	N/A	N/A	N/A
Total organic carbon	Yearly	Yearly	Yearly
Zinc	Yearly	Monthly	Monthly

Table 3 Assessment of Compliance “Not Determined” (Page 8 of Final Compliance Audit Report)<sup>3</sup>

Not Determined	Licensee Comment	Status/Action	Supporting Material
EPL condition O2.1(b) (Maintenance of plant and equipment) Riser	The Licensee provides the following: <ul style="list-style-type: none"> <li>the leachate system is and was operational;</li> <li>the riser pumps water to the plant, and the plant is and was operational; and</li> <li>the EPA inspected the plant.</li> </ul>	Closed	None Required
EPL condition O2.1(b) (Maintenance of plant and equipment) Monitoring equipment	The Licensee provides the following: <ul style="list-style-type: none"> <li>the operation of all monitoring equipment is currently being reviewed in conjunction with the Licensee’s Annual EMS Review.</li> </ul>	Closed	None Required
EPL condition O5.8 (Waste management)	We have reviewed the EPA March Comments, and the Licensee provides the following: <ul style="list-style-type: none"> <li>surface water monitoring does not indicate leachate contamination of the in-pit dam;</li> <li>all leachate is currently directed to the leachate treatment plan; and</li> <li>the Licensee continues to conduct surface water monitoring in accordance with the EPL.</li> </ul>	Closed	None Required

<sup>3</sup> Glossary:

**EPA March Comments** means the comments made by the EPA under the column headed “Action required by Licensee” of “Table 3 Assessment of Compliance with EPL 13426” in Section 2 on page 8 of Final Compliance Audit Report.

Not Determined	Licensee Comment	Status/Action	Supporting Material
EPL condition O6.1 (Other operating conditions)	<p>The Licensee provides the following:</p> <ul style="list-style-type: none"> <li>• the document entitled Genesis Landfill Facility - Proposed Groundwater Sump (Ref:BJ07/LT264 Rev B) is no longer relevant to the operation of the landfill as the waste height has reached above 5 metres;</li> <li>• the groundwater interception system was only proposed to continue until the waste height reached 5 metres after which it was considered that the downward pressure from the waste mass will be sufficient to prevent any adverse impacts due to localised groundwater pressure; and</li> <li>• the Licensee will apply for a variation to the EPL.</li> </ul>	Closed	None Required
EPL condition O6.5 (Other operating conditions)	<p>We have reviewed the EPA March Comments, and the Licensee provides the following:</p> <ul style="list-style-type: none"> <li>• the Licensee plans to undertake an assessment of the integrity of the existing lining in the bunded area.</li> </ul>	Closed	None Required
EPL condition M7.2 (Other monitoring and recording conditions)	No action required.	Closed	None Required
EPL condition E4.1(c) (Approved alternative daily cover specification – particulate waste materials)	No action required.	Closed	None Required

## Section 3 Further Observations (Page 58 of Final Compliance Audit Report)

Observation	Licensee Response/Comment	Status/Action	Supporting Material
Visual inspection record sheet	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>• iAuditor the tool utilised by site staff to record daily, fortnightly and monthly checks, currently includes the ability to provide notes, images and corrective actions, and staff are reminded to use these options; and</li> <li>• the Environmental Officer for the site monitors corrective actions requirements.</li> </ul>	Closed	Being undertaken as part of the Licensee's Checklist Review and Annual EMS Review
Storage of Bulk Fuels	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>• break valves are installed on the fuel hoses to limit discharge in the event of a hose break; and</li> <li>• the fuel area has been added to the non-operational onsite checklists as part of the Checklist Review.</li> </ul>	Closed	None Required
Maintenance of spill stations	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>• the spill kit has been replaced; and</li> <li>• signage is to be installed that will note "spill kit <i>not</i> for rubbish".</li> </ul>	Closed	The replaced spill kit and its contents ( <b>Photos 11 &amp; 12</b> ).
Publishing pollution monitoring data	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>• as part of the Annual EMS Review the Licensee is currently updating the website including updating the required disclosure information;</li> <li>• the EPL indicates that monitoring data is required to be collected for surface water, ground water, leachate and noise;</li> <li>• Q1 2019 monitoring data for surface water and ground water is published on the Licensee's website;</li> </ul>	Closed	None Required



Observation	Licensee Response/Comment	Status/Action	Supporting Material
	<ul style="list-style-type: none"> <li>monitoring point site plans are included in the relevant management plans, and will be further updated and reviewed as part of the Monitoring Points Review; and</li> <li>a link to the EPA's EPL website page will be uploaded to the new website.</li> </ul>		
Annual Return	The Licensee notes the Annual Return requirements for reference when preparing future Annual Returns.	Closed	None Required
Air Quality Monitoring (Dust)	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>the Licensee notes the issues raised by the EPA in relation to Air Quality monitoring and has addressed this with the relevant consultant responsible for monitoring in accordance with EPL20121; and</li> <li>the advice of the relevant consultant is being sought in relation to options to improve current monitoring locations.</li> </ul>	Closed	Compliant covers have been installed over the dust monitor points ( <b>Photo 13</b> ), being undertaken as part of the Licensee's Annual EMS Review.

### Section 5 Areas for Improvement (Page 67 of Final Compliance Audit Report)

Item	Area	Licensee Response/Comment	Status/Action	Supporting Material
1	Sign Posting Monitoring Points	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>monitoring points have been labelled.</li> </ul>	Closed	EPA ID Point labelling ( <b>Photos 14</b> ), being undertaken as part of the Licensee's Monitoring Points Review.
2	Site Induction	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>site induction currently includes staff training on the POEO Act, EPL and Construction &amp; Demolition waste minimum standards (where relevant); and</li> </ul>	Closed	Driver Site Rules with Environment Obligations ( <b>Attachment 5</b> ).

Item	Area	Licensee Response/Comment	Status/Action	Supporting Material
		<ul style="list-style-type: none"> <li>site systems and procedures are being updated to meet the requirements of ISO standards 14001, 45001 and 9001 which addresses staff induction and training.</li> </ul>		
3	Sampling procedure	<p>The Licensee provides the following response and comment:</p> <ul style="list-style-type: none"> <li>the relevant consultant will be consulted to improve procedures to ISO standards.</li> </ul>	Closed	Sampling Procedures for leachate and surface-water dated 19 July 2016 ( <b>Attachment 6</b> ).