

Dixon Sand Pty Ltd

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**Response and Action Plan for the
Independent Environmental Audit 2019,
Old Northern Road Quarry**



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Abbreviations

AQMP	Air Quality Management Plan
BRMP	Biodiversity and Rehabilitation Management Plan
DA250-09-01	Development Consent DA250-09-01 (Modification 5) for the Old Northern Road quarry
Dixon Sand	Dixon Sand Pty Ltd, formerly Dixon Sand (Penrith) Pty Ltd
DPIE	Department of Planning, Industry and Environment
EMS	Environmental Management Strategy
EPA	NSW Environment Protection Authority
EPL3916	Environment Protection Licence 3916 for the Old Northern Road quarry
IEA 2019	Independent Environmental Audit 2019
NMP	Noise Management Plan
RWC	R.W. Corkery and Co Pty Ltd
SWMP	Soil and Water Management Plan
TMP	Traffic Management Plan
WAL	Water Access Licence

1. Introduction

1.1 Development Approval Requirement

Dixon Sand Pty Ltd (Dixon Sand) operates the Old Northern Road Quarry located in Maroota, New South Wales under the Development Consent DA 250-09-01 (Modification 5).

Condition 13 of Schedule 5 of DA 250-09-01 requires:

By the end of November 2019, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission, commence and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies and the CCC;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals);*
- (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals;*
- (e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and*
- (f) be conducted and reported to the satisfaction of the Secretary.*

Condition 14 of Schedule 5 of DA 250-09-01 requires:

Within 12 weeks of commencing this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Applicant must implement these recommendations, to the satisfaction of the Secretary.

1.2 Background Information

The appointment of R.W. Corkery and Co Pty Ltd (RWC) to carry out the Independent Environmental Audit (IEA) for Dixon Sand as per the consent conditions above was approved by the Department of Planning, Industry and Environment (DPIE) on 11th July 2019.

The IEA commenced on 22 October 2019 for both the Old Northern Road and Haerses Road Quarries and the *Independent Environmental Audit: Old Northern Road Report* (RW Corkery & Co, January 2020, Document No. 1021/01) issued on 11th January 2020.

1.3 Objective

The *Dixon Sand Pty Ltd – Response and Action Plan for the Independent Environmental Audit 2019, Old Northern Road Quarry* (this Document) has been prepared in accordance with Condition 14 of Schedule 5 of DA 250-09-01. This Document outlines Dixon Sand's response and proposed actions toward the IEA findings, recommendations for non-compliances and suggested improvements as identified in *the Independent Environmental Audit: Old Northern Road Report* (RW Corkery & Co, January 2020, Document No. 1021/01). This Document has been prepared in accordance with the *Independent Audit – Post Approval Requirements June 2018* (Department of Planning and Environment, 2018).

2. Independent Environmental Audit Finding

2.1 IEA Finding Summary

Table 1 outlines the status of compliance against the conditional components of Development Approval 250-09-01, Environment Protection Licence (EPL) 3916, and Water Access Licence (WAL) 24341.

Table 1: Compliance Status for the Development Consent and Licences.

Approval	DA 250-09-01	EPL 3916	WAL 24341
Compliant	178	38	2
Non-compliant	5	1	0
Not triggered	33	11	8
Not Determined	1	4	0
Total	217	54	10

2.2 Response, Proposed Actions and Implementation Timeframe for Compliance based Recommendations and Suggested Improvements

A total of 15 compliance-based recommendations and 15 suggested improvements were provided by the IEA.

The proposed actions and implementation timeframe for the recommendations arising from non-compliances are outlined in Table 2.

The response, proposed actions and implementation timeframe for the suggested improvements are contained in Table 3.

Table 2: Proposed Action and Implementation Timeframe for the Recommendations arising from Non-Compliances

ID	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
ONR R1/19	<p>Ensure that adequate bunding (mobile or fixed) is available and utilised for storage of hydrocarbon drums in accordance with AS1940.</p> <p><i>A number of 205L hydrocarbon drums were observed be stored within a dedicated storage area within the workshop (Photographs E1021A_104 and 303). However, the dedicated area is not bunded and insufficient bunded pallets were available for all drums to be stored in accordance with AS1940. This is required to maintain compliance with conditional requirements and to minimise the potential for harm in the event of spills.</i></p>	<p>Proposed Action: Adequate bunding for storage of hydrocarbon drums in accordance with AS1940 will be utilised/installed at the nominated storage area located in the workshop.</p> <p>Implementation Timeframe: 31 January 2020</p>
ONR R2/19	<p>Ensure that the Positive Public Covenant or other agreed method for providing long-term security of the Haerses Road Biodiversity Offset Area is implemented.</p> <p><i>DA 250-09-01 Schedule 3 Condition 25(c) requires that a long term security is provided for the Haerses Road Biodiversity Offset Area. Whilst proposed terms for a Public Positive Covenant have now been submitted, confirmation of these terms is awaited from DPIE. It is important that the Company remains proactive in following up and implementing the required security.</i></p>	<p>Proposed Action: Confirmation awaiting from DPIE regarding the conditional terms for the Positive Public Covenant. Once finalised, an application to inact the Positive Public Covenant for the Haerses Road Biodiversity Offset Area will be submitted.</p> <p>Implementation Timeframe: Application to inact the Positive Public Covenant for Haerses Road Biodiversity Offset Area will be processed once Dixon Sand receives confirmation from the DPIE regarding the condition terms.</p>
ONR R3/19	<p>Submit a variation application for EPL 3916 to either remove Condition A4.1 or update to reference DA 250-09-01.</p> <p><i>The current Condition A4.1 requires compliance with a consent which is no longer valid. Therefore compliance cannot be determined and the legal enforceability of this requirement is uncertain.</i></p>	<p>Proposed Action: An application for a variation to the EPL 3916 will be submitted to request the removal of condition A4.1.</p> <p>Implementation Timeframe: EPL variation application will be submitted by 31 March 2020.</p>
ONR R4/19	<p>Adopt a complaint recording and response form which requires the entry of all required information for each complaint received at the Quarry. Ensure that personnel responsible for recording compliant and subsequent investigation details are made aware of the requirement to record all necessary details.</p>	<p>Proposed Action: The existing Complaint Registration Form forms Appendix 13 of the Environmental Management Strategy (EMS). The Complaint Registration Form will be reviewed and if required, revised as part of the EMS and Management Plan review post the IEA Report submission. The revised form will include all requirements outlined in Condition M5.2 of EPL 3916.</p>

ID	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
	<p><i>Current forms omit details which are required to be recorded for each complaint. Complaint forms should include sections requiring the recording of all details specified in Condition M5.2 of EPL 3916.</i></p>	<p>The personnel responsible for recording complaint will be retrained of the relevant requirements.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR R5/19	<p>Amend the Traffic Management Plan and associated driver induction documents to include measures / statements encouraging the display of appropriate signage on trucks used to transport products from the Quarry.</p> <p><i>DA 250-09-01 Schedule 3 Condition 22(d) requires the Company to “use its best endeavours to ensure that appropriate signage is displayed on all trucks used to transport product from the development so they can be easily identified by road users”. Whilst it is understood the Company does not have legal jurisdiction to enforce display of signage, formal ‘encouragement’ to do so is required.</i></p>	<p>Proposed Action: The Traffic Management Plan (TMP) will be revised to include a statement encouraging haulage trucks to ensure appropriate signage is displayed. A broadcast email will also be sent to the haulage truck companies acknowledging the same request.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR R6/19	<p>Seek advice from a qualified ecologist regarding the best approach to preserving the native seedbank within topsoil stockpiles whilst limiting dust generation and revise the Air Quality Management Plan accordingly.</p> <p><i>The current Air Quality Management Plan requires that topsoil stockpiles are stabilised using non-invasive cereal or legume cover crops. Limited cover of topsoil stockpiles is currently achieved by native species which have emerged naturally from the stored seedbank. The Company advises that sowing a cover crop would compromise the existing native seedbank.</i></p>	<p>Proposed Action: Advice from a qualified ecologist will be sought regarding the best approach to preserve the native seedbank within topsoil stockpiles whilst limiting dust generation. The Air Quality Management Plan will then be revised accordingly.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>

ID	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
ONR R7/19	<p>Ensure that annual water usage volumes, including groundwater extraction volumes under WAL 24341 (including nil extraction), are reported annually as required under the licence conditions and that 'Water Take' is reported in the Annual Review in accordance with the Annual Review Guideline (NSW Government, 2015).</p> <p><i>It is understood that annual water usage were not reported during the audit period. Furthermore, the water take component outlined in the Annual Review Guidelines has not been include in the 2017, 2018 or 2019 Annual Reviews.</i></p>	<p>Proposed Action: Future annual usage volumes for groundwater extraction under WAL 24341 will be reported to WaterNSW and included in the Annual Review.</p> <p>Implementation Timeframe: The annual usage volume for groundwater extraction under WAL 24341 will be reported within the deadline stipulated by WaterNSW. Reporting of annual usage volume of groundwater under WAL 24341 will be included in all future Annual Reviews. The next Annual Review for the period of Financial Year 2019-2020 is due by the end of September 2020.</p>
ONR R8/19	<p>Rationalise the water level and water quality trigger values nominated in the Surface Water Management Plan using either default water quality guideline values or site specific trigger values.</p> <p><i>Current water quality trigger values specified by the Surface Water Management Plan are restrictive and inadequately reflect natural variation in water quality. Default water quality guideline values should be utilised until appropriate site-specific trigger values (20th and 80th percentile values) can be derived, generally from a minimum of two years of monthly data.</i></p>	<p>Proposed Action: The water level and water quality trigger values in the Soil and Water Management Plan will be reviewed and revised appropriately.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR R9/19	<p>Ensure that water monitoring results are reviewed against the relevant trigger and criteria values as soon as possible following receipt of results. If water quality or levels exceeds the nominated trigger values, implement measures outlined in the trigger action response plan.</p> <p><i>Exceedances of the nominated trigger values must be identified as soon as possible to permit the effective implementation of response measures outlined in the trigger action response plan (e.g. confirmation sampling, increase in sampling frequency or investigation of possible causes).</i></p>	<p>Proposed Action: Once water monitoring results are obtained a review against the relevant trigger and criteria will be undertaken. Measures outline in the trigger and response plan will be implemented accordingly.</p> <p>Implementation Timeframe: Immediate</p>
ONR R10/19	<p>Ensure that, when a verified complaint or non-compliance with the Drivers Code of Conduct occurs, notification is provided to the other quarries who are also</p>	<p>Proposed Action:</p>

ID	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
	<p>signatories to the Maroota Local Traffic Management Policy and request confirmation as to whether that truck or driver have any verified complaints/non-compliances at those quarries. Should it be verified that the driver has multiple verified complaints/non-compliances, ensure disciplinary action is undertaken in accordance with the Policy.</p> <p><i>Traffic is a key management measure for the community given 8 of 9 complaints received during the audit period related to trucks and that traffic was the key matter raised during the community survey presented at the CCC meeting on 21 November 2017. Whilst the fundamentals of the traffic management is included in the traffic management plan, effective implementation through collaboration with the other local quarries is needed.</i></p>	<p>A meeting between the signatories of the Maroota Local Traffic Management Policy will be held to discuss the procedure for verifying complaint and non-compliances between the three quarries.</p> <p>The Maroota Local Traffic Management Policy will be reviewed and revised where appropriate.</p> <p>Implementation Timeframe: 31 March 2020</p>
ONR R11/19	<p>Notify all truck drivers of verified complaints / non-compliances relating to traffic and transportation (but maintain complainant and driver privacy) to ensure that they are aware of what types of complaints are being received and that these are being actioned.</p> <p><i>Supplementing driver induction documentation with ongoing reminders that any non-compliance with these requirements is being actioned may assist in improving driver behaviour.</i></p>	<p>Proposed Action:</p> <p>Truck drivers will be notified of any complaints received or non-compliances relating to traffic and transportation. On-going educational campaign for truck drivers which are currently in place will continue to be carried out.</p> <p>Please note that Dixon Sand is currently implementing the above measures in the form verbal and written notifications to drivers.</p> <p>Implementation Timeframe: immediate</p>
ONR R12/19	<p>Ensure that monthly and annual summaries of product volumes transported from the Quarry are published on the Dixon Sand website every six months.</p> <p><i>Six monthly truck movement summaries are provided on the Dixon Sand website however six monthly production summaries are not provided.</i></p>	<p>Proposed Action:</p> <p>Both the six monthly truck movement and six monthly production summary data will be published on Dixon Sand's website every six months.</p> <p>Implementation Timeframe: Immediate</p>
ONR R13/19	<p>Install and maintain silt fences at the base of topsoil stockpiles until a 70% vegetative (or mulched) cover is achieved to prevent soil loss to surrounding areas.</p> <p><i>Soil stockpiles were observed with insufficient groundcover but no silt fencing (Photographs E1021A_178 to 181). Whilst no significant loss of soil was</i></p>	<p>Proposed Action:</p> <p>Silt fences will be installed at the base of topsoil stockpiles until 70% vegetative (or mulched) cover is achieved.</p>

ID	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
	<p><i>obvious and runoff from the stockpiled soil is unlikely to affect water quality or surrounding undisturbed habitat, failure to maintain the silt fencing is in non-compliance with the commitments within the Biodiversity and Rehabilitation Management Plan.</i></p>	<p>Implementation Timeframe: 31 January 2020</p>
ONR R14/19	<p>Develop, in consultation with weed management contractors, a weed density and distribution map for the Quarry.</p> <p><i>The weed density and distribution map should be updated annually and included and discussed in Annual Reviews for each reporting period in order to provide a record of weed management activities.</i></p>	<p>Proposed Action: A weed density and distribution map for the quarry will be developed in consultation with the weed management contractors and project ecologist.</p> <p>Implementation Timeframe: 31 March 2020</p>
ONR R15/19	<p>Develop and implement a translocated specimens form for use during translocation activities to ensure that all necessary information is recorded for each specimen.</p> <p><i>The translocated specimens form should require the recording of a unique specimen ID, original and translocated locations (including GPS coordinates and photographs of each location), a description of the appropriateness of the translocation position in the landscape, the date of translocation, confirmation of watering following translocation, an assessment of health, height, flowering status, dieback, and broad vegetation community for each specimen. Additional details regarding translocation timing (e.g. seasonal period, following rainfall, the effectiveness of previously recommended actions to protect/enhance the species etc.) should also be recorded on this form. A variation of this form may also be used to record necessary details during subsequent monitoring of translocated specimens, with details including browning or loss of foliage, evidence of unsuitable environmental conditions (e.g. sunburn or windburn), evidence of grazing or insect damage and evidence of plant disease recorded for each specimen.</i></p>	<p>Proposed Action: A Vegetation Translocation proforma will be developed to include all the necessary information. The Vegetation Translocation proforma will be utilised for any future flora translocation.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date</p>

Table 3 Response, Proposed Action and Implementation Timeframe for the Suggested Improvements

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
ONR 11/19	<p>Ensure that the Air Quality Management Plan clearly defines and separates the compliance criteria, reactive measures, and notification requirements for both DA 250-09-01 and EPL 3916.</p> <p><i>A review of the AQMP confirms that not all requirements of EPL 3916 are specified or clearly separated from the requirements DA 250-09-01. As a result reliance upon the AQMP alone in reviewing and responding to air quality monitoring results could result in a non-compliance or incorrect responses. For example, the 2018 and 2019 Annual Reviews reported that DA 250-09-01 Schedule 3 Condition 7 was non-compliant, however, a review of the data indicates that compliance was achieved. Further, whilst the Annual Review recorded non-compliances with the DA, these were not recorded as being notified to the (then) DPE.</i></p>	<p>Proposed Action: A review of the Air Quality Management Plan (AQMP) will be undertaken. The AQMP will be revised to ensure that there is clear segregation between the compliance criteria, reactive measures and notification requirements for both DA 250-09-01 and EPL 3916.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date</p>
ONR 12/19	<p>Ensure that the incident register (or other record) includes adequate detail to enable compliance against each aspect of the response measures. Given the regularity that this is required, this could be assisted through the use of a simple template form which summarises the requirements and provides for a response to be entered which demonstrates compliance or states where the requirement was not triggered and why. This form could support any required reporting to relevant government agencies.</p> <p><i>With the various and different requirements around air quality criteria triggers and exceedances, the information within the incident register is currently insufficient to determine strict compliance in all instances. See also Improvement ONR 11/19.</i></p>	<p>Proposed Action: Review and revise the incident registration and response/notification procedure to include adequate details enabling compliance against each aspect of the response measure.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR 13/19	<p>Include an explanation within the Air Quality Monitoring Program of how the TEOM trigger system works, including frequency of sampling / averaging, and that, whilst there is a trigger value of 37µg/m³, the sampled value from one sampling / averaging period to the next may 'jump' above this level.</p> <p><i>The actual levels reported as part of the trigger alarm have ranged from 42.1µg/m³ to 61.6µg/m³, i.e. the PM10 concentration rises quickly above the</i></p>	<p>Proposed Action: Review and revise the AQMP to include an explanation of how the TEOM trigger system works, including information such as sampling/averaging to assist in the interpretation of data.</p> <p>Implementation Timeframe:</p>

	<i>trigger from one measurement to the next. The Air Quality Management Plan should be clear to all stakeholders (the community, regulators, and Company personnel) on how the trigger system works in practice.</i>	Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.
ONR I4/19	Update the SDS register to include all chemicals on site, the current SDS, an index of chemicals organised in alphabetical order, and a map of the key storage locations, spill kits, etc. <i>Two on-site chemicals (Roundup and QD 601 Super Enamel) were selected to spot check the SDS register. Whilst the SDS for Roundup was available it was dated 2004 (i.e. beyond the 5 year review period). The SDS for QD 601 Super Enamel was not available. The SDS register also did not contain an index to enable ready identification of the available SDS or a map of the key storage locations.</i>	Proposed Action: The SDS register will be reviewed and updated. The revision of the SDS register has commenced. Implementation Timeframe: 31 March 2020
ONR I5/19	Replace timber boundary markers with steel markers over which ~2m long high visibility conduit (or similar) is placed. <i>Whilst some marker posts were steel, many timber stakes were also in use. Steel pickets will provide a more enduring marker and use of high visibility conduit or similar will enhance the visibility of the marked boundary.</i>	Proposed Action: The surveyor's timber pegs will be replaced with steel markers where possible. Implementation Timeframe: 31 March 2020
ONR I6/19	Document within the Environmental Management Strategy, or other suitable management / procedures document, a simple Aboriginal heritage finds procedure which addresses the requirements of DA 250-09-01 Schedule 3 Condition 24. <i>Whilst DA 250-09-01 Schedule 3 Condition 24 does not require a documented finds procedure, inclusion of this within relevant documentation, and appropriate training, will increase the likelihood that appropriate steps are undertaken in the event of an unexpected find.</i>	Proposed Action: An "Unexpected Finds Procedure" will be developed as part of the EMS. This is inclusive of any Aboriginal Heritage Finds to address the requirement of DA 250-09-01 Schedule 3 Condition 24. Toolbox training for Quarry operators will include the above new procedure once the revised EMS is approved by the DPIE. Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.

ONR 17/19	<p>Update the Soil and Water Management Plan to address / specify the relevant requirements of the Approved methods for the sampling and analysis of water pollutants in NSW as referenced within EPL 3916 Condition M3.1.</p> <p><i>As no discharges occurred during the reporting period this requirement was not triggered. Whilst the Soil and Water Management Plan is not inconsistent with the requirements of EPL 3916, specific review and reference to the relevant requirements of the Approved methods would assist in ensuring compliance is achieved.</i></p>	<p>Proposed Action: The Approved methods for the sampling and analysis of water pollutants in NSW will be included in the SWMP to comply with EPL 3916 Condition M3.1</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR 18/19	<p>Update references to Figure 1.3 to Figure 3.1 in the Noise Management Plan.</p> <p><i>A minor typo was identified in the Noise Management Plan.</i></p>	<p>Proposed Action: The references to Figures 1.3 to Figure 3.1 in the NMP will be updated.</p> <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR 19/19	<p>Ensure that future Annual Reviews:</p> <ul style="list-style-type: none"> • include relevant criteria / trigger action levels on applicable charts and graphs; • assess water quality criteria against the criteria / trigger action levels; • include a summary of any actions raised by government agencies in response to the previous Annual Review and where those issues have been addressed in the current reporting period. <p><i>During the audit, a range of opportunities were identified to improve the value of the Annual Reviews. In some instances these improvements will assist in demonstrating compliance.</i></p>	<p>Proposed Action: Future Annual Reviews will include:</p> <ul style="list-style-type: none"> • include relevant criteria / trigger action levels on applicable charts and graphs, where applicable; • assess water quality criteria against the criteria / trigger action levels, where applicable; • include a summary of any actions raised by government agencies in response to the previous Annual Review and where those issues have been addressed in the current reporting period. <p>Implementation Timeframe: Immediate</p>
ONR 110/19	<p>Review and update the Soil and Water Management Plan taking into consideration the following.</p>	<p>Proposed Action:</p>

	<ul style="list-style-type: none"> • Review and update the water level and quality trigger levels (see also Recommendation ONR R8/19). • Presentation of all relevant criteria / trigger levels, including discharge criteria, in a single sub-section with a dedicated heading/headings. • Preparation of an 'Incident Response' subsection which clearly outlines the relevant requirements for all approvals / licences. • Inclusion of level 4 headings in the table of contents to assist with document navigation. • Clarify the location and details of the licenced bores attached to WAL 24341. <p><i>During the audit, a range of opportunities were identified to improve the value of the Soil and Water Management Plan. In some instances these improvements will assist in maintaining or demonstrating compliance .</i></p>	<p>A review and update o the SWMP will take the following aspects into consideration:</p> <ul style="list-style-type: none"> • Review and update the water level and quality trigger levels • Presentation of all relevant criteria / trigger levels, including discharge criteria, in a single sub-section with a dedicated heading/headings. • Preparation of an 'Incident Response' subsection which clearly outlines the relevant requirements for all approvals / licences. • Inclusion of level 4 headings in the table of contents to assist with document navigation. • Clarify the location and details of the licenced bores attached to WAL 24341. <p>Implementation Timeframe: Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE. Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
<p>ONR I11/19</p>	<p>Include within future Annual Biodiversity & Rehabilitation Management Report an assessment against the translocation performance criteria for translocation as outlined in Section 6.5.6 of the Biodiversity and Rehabilitation Management Plan.</p> <p><i>During the audit period, the success of translocated plants appears to have only been assessed against the survival proportion and not correlated back to the number of individuals impacted. This is required in order to assess compliance.</i></p>	<p>Proposed Action: The assessment against the translocation performance criteria for translocation (as outlined in Section 6.5.6 of the Biodiversity and Rehabilitation Management Plan) will be included in future Annual Biodiversity & Rehabilitation Management Report.</p> <p>Implementation Timeframe: Immediate</p>
<p>ONR I12/19</p>	<p>Consider combining the performance criteria outlined in Section 6.5.6 of the Biodiversity and Rehabilitation Management Plan with those outlined in Section 5.2 and drawing upon those outlined within Appendix 5 so there is a consolidated summary.</p>	<p>Proposed Action: Review and revise the Biodiversity and Rehabilitation Management Plan to combine the performance criteria outlined in Section 6.5.6 and those contained in Section 5.2, with consideration of those outlined in Appendix 5 to provide a consolidated summary for future assessment and reporting.</p> <p>Implementation Timeframe:</p>

	<p><i>The inclusion of a separate performance criteria within an 'isolated' subsection (6.5.6) has resulted in its assessment being missed as part of the Annual Biodiversity & Rehabilitation Management Report.</i></p>	<p>Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE.</p> <p>Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR I13/19	<p>Update the Traffic Management Plan to reflect the current School Zone times and alert all truck drivers to this change in times.</p> <p><i>It was identified that the TMP current identifies school zone times as 8.30am - 9.00am and 3.00pm – 3.30pm, however, the Department of Education has confirmed they are currently between 8:00am and 9:30am and between 2:30pm and 4:00pm.</i></p>	<p>Proposed Action:</p> <p>The TMP will be updated to reflect the following school zone times:</p> <ul style="list-style-type: none"> • 8:00am to 9:30am, and • 2:30pm to 4:00pm <p>Implementation Timeframe:</p> <p>Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE.</p> <p>Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.</p>
ONR I14/19	<p>Review and update the Environmental Management Strategy taking into consideration the following.</p> <ul style="list-style-type: none"> • The change in water supply licences from the Water Act 1912 to the Water Management Act 2000 (i.e. Water Supply Works and Use Approvals and Water Access Licences). • List the monitoring bore licences issued under the Water Act 1912. • Update the Annual Review reporting components to reflect the agreed reporting period (financial year) and submission timing (by 30 September). <p><i>During the audit a range of opportunities were identified to improve the value of the Environmental Management Strategy. In some instances these improvements will assist in maintaining compliance .</i></p>	<p>Proposed Action:</p> <p>The EMS will be reviewed and the following revision will applied to the document:</p> <ul style="list-style-type: none"> • The change in water supply licences from the <i>Water Act</i> 1912 to the <i>Water Management Act</i> 2000 (i.e. Water Supply Works and Use Approvals and Water Access Licences). • A list of the monitoring bore licences issued under the <i>Water Act</i> 1912, if applicable. • The reporting period for the Annual Review will be amended to reflect the financial year. The submission date for the Annual Review will be amended to 'by 30 September of each year', as agreed and approved by the DPIE. <p>Implementation Timeframe:</p> <p>Condition 5 (c) of Schedule 5 of DA 250-09-01 requires Dixon Sand to undertake a review of the EMS and Management Plans within 3 months of the submission of the IEA report and a notification to be provided to the DPIE.</p>

		Should the review lead to revisions of the document, the revised document will be submitted within 6 weeks of the review notification date.
ONR 115/19	<p>Consider preparing a formal document outlining the various plans, strategies, programs, forms, templates, registers etc. which form the Environmental Management System. The document should be structured so as to outline the framework of the Environmental Management System so that a new employee could locate all necessary documentation. In preparing the document, identify any gaps or updates required or where opportunity exists to consolidate or simplify.</p> <p><i>Whilst a certified Environmental Management System is not required, a formalised and documented system would assist both existing and future personnel in effectively implementing the system.</i></p>	<p>Proposed Action: A formal document outlining the components which constitute the Quarry's Environmental Management System will be prepared to highlight the framework of the system and procedures.</p> <p>Implementation Timeframe: 30 June 2020</p>