



Government of Western Australia
Department of Finance

PERFORMANCE AND COMPLIANCE REPORT

INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

JULY 2020 – JUNE 2021

Final
June 2022



Department of Finance

PERFORMANCE AND COMPLIANCE REPORT

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST**

JULY 2020 – JUNE 2021

Prepared by Aurora Environmental

**June 2022
DFI2020-001-0PCR_LM_Revision 1.0**

EXECUTIVE SUMMARY

This Performance and Compliance Report (PCR) summarises the compliance of the operation of the Intractable Waste Disposal Facility (IWDF), Mt Walton East, against Ministerial Statement No. 562, permits, registrations, licences and associated management plans and other system requirements for the period July 2020 to June 2021.

This report demonstrates that the operation of the IWDF between July 2020 and June 2021 complied, where applicable, with the requirements of Ministerial Statement No. 562, permits, licences and the IWDF Environmental, Health and Safety and Quality Management Systems (EHSQMS).

No disposal operations were undertaken during the reporting period.

Ongoing management and monitoring activities were undertaken, including groundwater, routine site inspections, liaison with the community and continual review and update of the EHSQMS for the IWDF.

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LIST OF ACRONYMS, INITIALISATIONS AND GLOSSARY

ARPANSA	Australian Radiation Protection and Nuclear Safety Agency
ASNO	Australian Safeguards and Non-Proliferation Office (ASNO), located within the Federal Department of Foreign Affairs and Trade portfolio.
CLC	IWDF Community Liaison Committee
DER	Department of Environment Regulation, now the Department of Water and Environmental Regulation
DWER	Department of Water and Environmental Regulation, previously Department of Environment Regulation
EPA	Environmental Protection Authority (Western Australia)
EHSQMS	Environmental, Health and Safety, and Quality Management System
Finance	Department of Finance - proponent for the IWDF
FMC	Facility Management Contractor
Intractable Waste	Waste that is a management problem by virtue of its toxicity or chemical or physical characteristics which make it difficult to dispose or treat safely (Landfill Waste Classifications and Waste Definitions 1996 (as amended December 2019, Western Australia: DWER, 2019)
IWDF	Intractable Waste Disposal Facility, located at Mt Walton East, Western Australia
PCR	Performance and Compliance Report
RCWA	Radiological Council Western Australia
RSO	Radiation Safety Officer

1. INTRODUCTION

1.1 IWDF Overview

The Intractable Waste Disposal Facility (IWDF) at Mt Walton East was established in the early 1990s and is owned by the Western Australian Government. The IWDF is Australia's first long-term disposal site for intractable waste and is only to be used for intractable waste generated in Western Australia, for which there is no other viable management option.

The IWDF has environmental approval for the disposal of a range of materials containing intractable chemical compounds or low to medium level radioactive waste.

1.2 Location of the IWDF

The IWDF is approximately 475 kilometres north-east of Perth and is located on 25 square kilometres of Crown Reserve Land, within the Shire of Coolgardie (Figure 1). Access to the site is by a one-hundred-kilometre unsurfaced road that extends northward from Boorabbin siding on Great Eastern Highway.

1.3 Purpose of Document

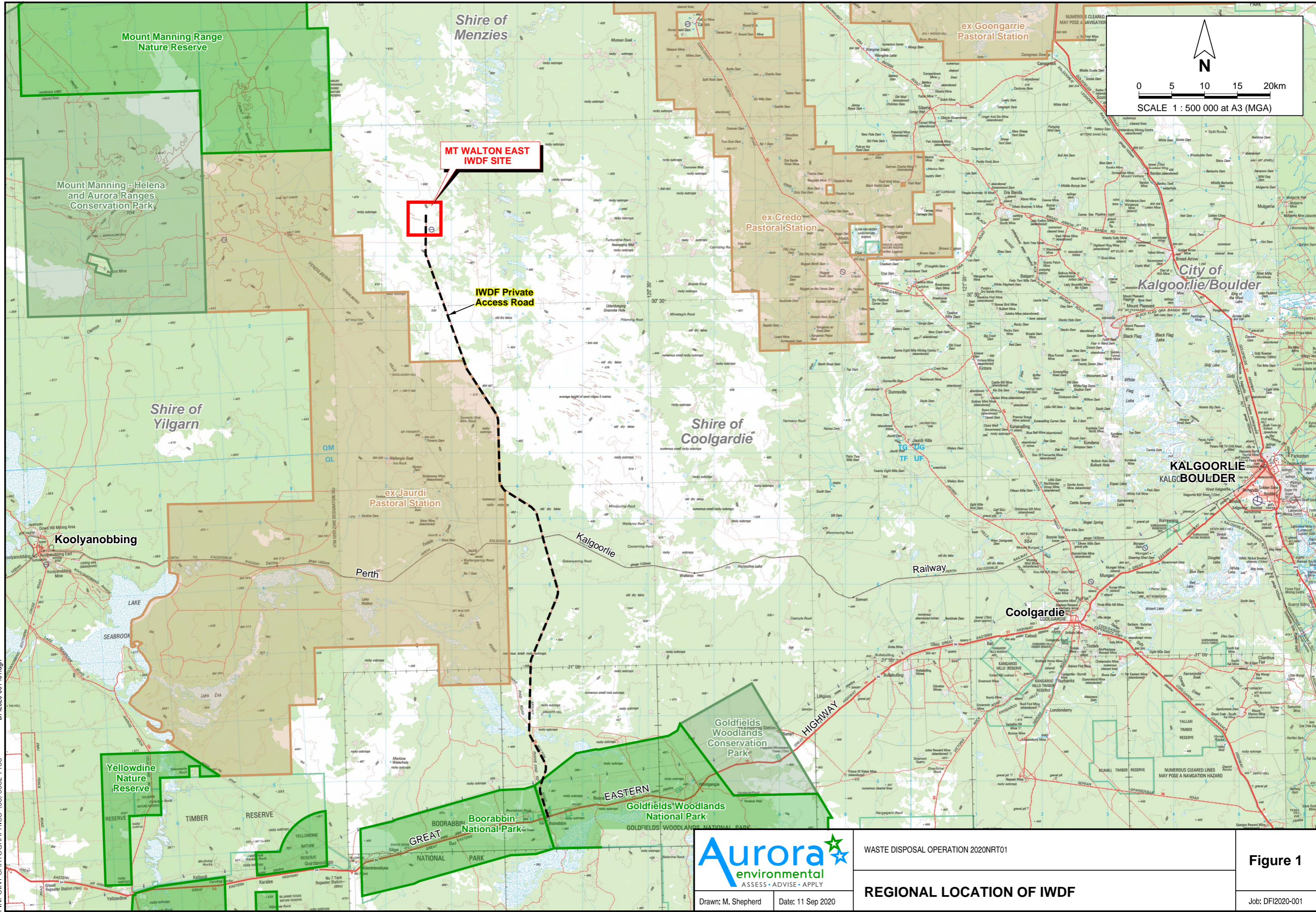
This Performance and Compliance Report (PCR) summarises the compliance of the operation of the IWDF against the requirements of:

- Ministerial Statement No. 562 (Appendix A);
- Radiological Council of Western Australia (RCWA) Registration RS 13/2011 20590 (Appendix B);
- Department of Environment Regulation (DER) Licence L8190/2007/1 (Appendix C);
- ASNO Permit PN207 (Appendix D);
- IWDF Management Plans (Appendix E): and
- IWDF Environmental, Health and Safety and Quality Management System (EHSQMS) procedures and other documents.

In particular, the PCR has been prepared to fulfil the requirements of Ministerial Condition 5.1 of Ministerial Statement 562, which requires the submission of periodic compliance reports and the IWDF EHSQMS, which requires the preparation of an annual PCR.

1.4 Disposal Operations

No disposal operations were conducted during the reporting period.



DF12020-001-01.dgn
 PINPOINT CARTOGRAPHICS (08) 9562 7136



Drawn: M. Shepherd Date: 11 Sep 2020

WASTE DISPOSAL OPERATION 2020NRT01

REGIONAL LOCATION OF IWDF

Figure 1

Job: DF12020-001

2. MANAGEMENT OF THE IWDF

2.1 Proponent

The Department of Finance (Finance) was the proponent for the IWDF from 1 July 2020 to 30 June 2021. Emma Savage Jones was the IWDF Project Director for Finance.

2.2 Facility Management Contractor

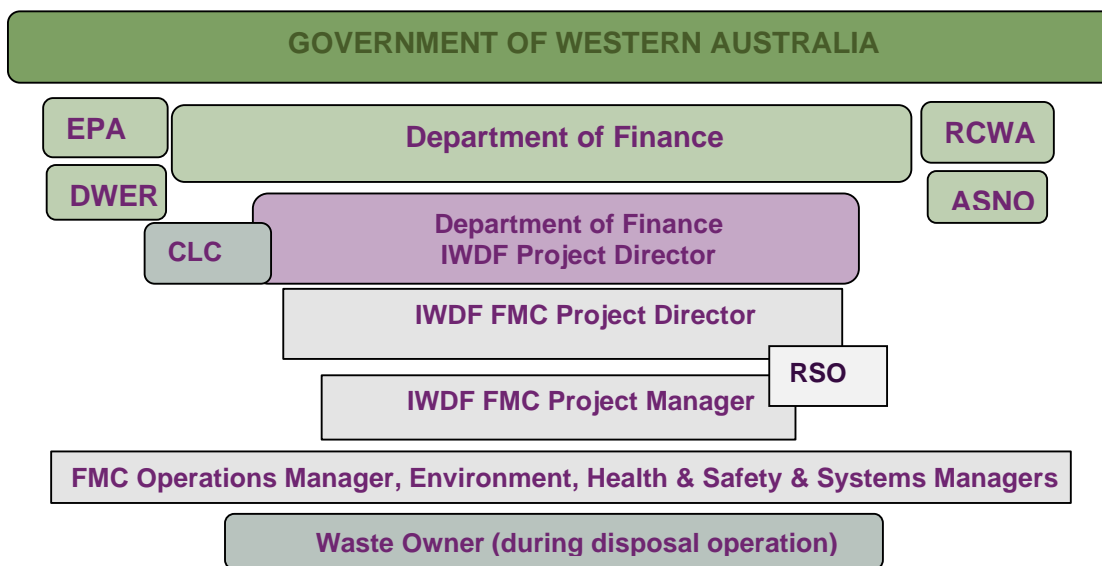
The Facility Management Contractor (FMC) with responsibility for the environmental and operational management of the IWDF for the period 1 July 2020 to 30 June 2021 was Aurora Environmental. Leanne Morton was the FMC IWDF Project Manager for Aurora Environmental.

Enquiries regarding this PCR should be emailed to IWDF-MountWalton@finance.wa.gov.au.

2.3 IWDF Governance

The governance of the IWDF for the 2020 - 2021 reporting period is illustrated in Figure 2 below.

Figure 2
July 2020 – June 2021 IWDF Governance Structure



2.4 Visits to the IWDF during 2020 – 2021 Reporting Period

Table 1 provides a summary of visits to the IWDF during the reporting period.

Table 1
Summary of Visits to the IWDF During 2020 – 2021 Reporting Period

Date of Visit	Purpose of Visit	Personnel & Role
28 July 2020	Regulator inspection of the IWDF	<i>Regulators</i> Leanne Zheng (DWER – Part IV assessment), Jennifer Fortune (DWER – Part IV compliance), Michael Greenslade (DWER – Part V assessment), Kasup Ranasinghe (DWER – Part V compliance), Lawson Brandis (DMIRS), Richard Smetana (DMIRS), Chris Ziatas (DPLH), <i>IWDF Personnel</i> Emma Savage-Jones (Finance Project Director), Leanne Morton (FMC Project Manager), <i>Observers</i> Julie Mahony, Stephen Hosking, Michael Ingram (Tellus Holdings Ltd).
26 Oct – 30 Oct 2020	Facility inspection, IWDF Access Road inspection, rehabilitation, capping, and groundwater monitoring. Installation of new signs on Access Road.	Mark Shepherd (FMC Project Director and Operations Manager), Shayne Pittaway (FMC Technician), Joshua Morgan (FMC Technician) and Leyton Radford (FMC Technician).
30 Mar - 1 Apr 2021	Facility inspection, IWDF Access Road inspection and groundwater monitoring	Mark Shepherd (FMC Project Director and Operations Manager); and Shayne Pittaway (FMC Technician).

3. REGULATORY INSTRUMENTS APPLIED TO THE IWDF

3.1 DWER Environmental Licence for Prescribed Premises

The IWDF is licensed by the Western Australian Department of Water and Environmental Regulation (DWER) under Part V of the *Environmental Protection Act 1986*, as a Prescribed Premises - Category 66 Class V intractable landfill site. Licence L8190/2007/1 is provided as Appendix C.

It should be noted that as of 1 July 2017 the Department of Environment Regulation (DER) merged with the Department of Water to form the Department of Water and Environmental Regulation (DWER). Licence L8190/2007/1 will not show this change until the licence is renewed in 2022.

Licence L8190/2007/1 includes two conditions which are as follows:

- 1. Reporting Conditions** - requiring the Licensee to provide an Annual Audit Compliance (AAC) report to the Director of the Environmental Regulation Division by 1 March each year.

2. **Notification of Intention to Dispose** - requiring the Licensee to notify the Director of the Environmental Regulation Division in writing three months prior to the delivery of waste at the IWDF.

The DER Licence L8190/2007/1 (Appendix C) displays an expiry date of 17 February 2017, however on the 29 April 2016 the Director General of the then DER issued a Notice of Amendment of Licence expiry dates, under Section 59(9)(b) and Section 59(1)(k) of the *Environmental Protection Act 1986*, which extended the expiry date of Licence L8190/2007/1 to 17 February 2022. This notice of amendment is also included at Appendix C.

3.1.1 Compliance Statement

Table 2 below details proponent compliance with Licence L8190/2007/1 Conditions.

Table 2
Environmental Licence L8190/2007/1 2020 - 2021 Compliance Statement

No.	Condition	Compliance Status
1	Reporting Conditions -- requiring the Licensee to provide an Annual Audit Compliance (AAC) report to the Director of the Environmental Regulation Division by 1st March each year.	In compliance – the AAC report was submitted to DWER via email on the 15 Feb 2021 – see Appendix F for AAC report.
2	Notification of Intention to Dispose -- requiring the Licensee to notify the Director of the Environmental Regulation Division in writing three months prior to the delivery of waste at the IWDF.	Not required as a disposal operation did not occur during the reporting period.

The AAC report acknowledged a noncompliance with Condition 2 for the 2019 – 2020 reporting period. Both the Environmental Protection Authority (EPA) and DWER, in their recommendation to the proponent regarding the draft 2019 - 2020 PCR, considered that the reported noncompliance did not impact on the objectives detailed in Commitment 6.1 of Ministerial Statement 562. The communication from the EPA and DWER is included at Appendix G.

3.2 Contaminated Sites Act 2003 IWDF Classification

The *Contaminated Sites Act 2003* was established to record and manage contaminated sites in Western Australia to protect people's health and the environment into the future.

As of June 2016, the IWDF has been classified as '*Contaminated – restricted use*' under the *Contaminated Sites Act 2003* and is listed on the Contaminated Sites Register.

The inclusion of the IWDF on the Contaminated Sites Register is essential for future generations as it will provide a permanent record regarding the purpose and location of the IWDF.

3.3 Management Orders

Management Orders issued under the *Land Administrations Act 1997* vest the Class C reserves associated with the IWDF (Crown Reserve 42001) and the IWDF Access Road (Crown Reserve 44102) with the Minister for Works.

3.4 Radiological Council Registration

The IWDF is required, under the *Radiation Safety Act 1975*, to be registered with the RCWA as premises in which radioactive substances are used, stored, or manufactured.

The RCWA registration RS 13/2011 20590 for 10 February 2020 to 8 February 2023 names the registrant as Emma Savage-Jones, Director, Building Management, Department of Finance and Stuart Parr as the RCWA approved RSO for the IWDF.

The RCWA registration for the reporting period is included as Appendix B.

3.4.1 Compliance Statement

Table 3 details Finance's compliance with the conditions, restrictions and limitations as defined on the RCWA Registration RS 13/2011 20590, as issued 10 February 2020.

Table 3
RCWA Registration of Premises 2020 – 2021 Compliance Statement

Conditions, Restrictions and Limitations	Compliance Status / Comment
1. This registration is for the disposal of radioactive waste at the Intractable Waste Disposal Facility (IWDF), Crown Reserve 42001 in accordance with the <i>Radiation Safety Act 1975 (Section 28)</i> .	Not auditable – general information.

Conditions, Restrictions and Limitations	Compliance Status / Comment
<p>2. The Registrant is directed to ensure that -</p> <p>2.1 prior to radioactive waste being accepted for final disposal at the IWDF, a disposal permit must be granted by the Radiological Council in accordance with <i>Section 34 of the Act</i>;</p> <p>2.2 disposals are undertaken in accordance with the <i>Radiation Safety Regulation 1983 and Regulation 31(A) near surface disposal of radioactive waste</i>, as amended;</p> <p>2.3 radiation safety management is undertaken by the appointed <i>Radiation Safety Officer (RSO)</i>, in accordance with his duties under <i>Regulation 19(3)</i>;</p> <p>2.4 all radioactive waste to be disposed of at the IWDF shall be conditioned in accordance with the <i>Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)</i>, <i>Radiation Health Series No 35</i>, <i>National Health and Medical Research Council of Australia 1992</i>;</p> <p>2.5 all radioactive waste to be packaged and transported to the IWDF shall be in accordance with the <i>Radiation Safety (Transport of Radioactive Substances) Regulations 2002</i> and the <i>Code of Practice for the Safe transport of Radioactive Material (2008)</i> as adopted;</p> <p>2.6 the <i>Radiation Safety Officer (RSO)</i> reports periodically in writing to the Radiological Council, the results of radiation monitoring and other factors relating to human health for the receipt, handling and near surface disposal of radioactive waste; and if there are any changes to the radiation safety management procedures for the IWDF;</p> <p>2.7 accurate records of all radioactive material disposed of at the IWDF shall be maintained and archived in an approved manner, and reported to the Radiological Council, including an updated report after each disposal campaign;</p>	<p>N/A - disposal of radioactive waste did not occur during the reporting period.</p> <p>N/A - disposal of radioactive waste did not occur during the reporting period.</p> <p>In compliance – all radiation safety management was undertaken by the appointed RSO.</p> <p>N/A - disposal of radioactive waste did not occur during the reporting period.</p> <p>N/A - disposal of radioactive waste did not occur during the reporting period.</p> <p>N/A – no radiation monitoring was required to be completed during reporting period.</p> <p>In compliance – a Retention and Disposal (R&D) Schedule for the Department of Finance was approved by the State Records Commission 21 March 2014. Various categories within the R&D Schedule specifically address the IWDF records that are to be retained permanently within the State Records Office of Western Australia. See Appendix H for Extract of R&D Schedule.</p> <p>A disposal close-out report has been submitted to the RCWA after each radioactive waste disposal. These reports are listed in the Special Conditions of this table.</p>

Conditions, Restrictions and Limitations	Compliance Status / Comment
<p>2.8 where appropriate, radiation safety is managed in accordance with the following IWDF guidelines, procedures and instructions –</p> <p><i>2.8.1 Disposal of Radioactive Waste at the Intractable Waste Disposal Facility (IWDF) Mt Walton East, Waste Acceptance Guideline and Waste Acceptance Proforma, Government of Western Australia, Department of Finance Building Management and Works, as amended;</i></p> <p><i>2.8.2 IWDF Radiation Procedure RP-01, Radiation Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;</i></p> <p><i>2.8.3 IWDF Operational Procedure OP-04, Waste Preparation for Disposal, Government of Western Australia, Department of Finance Building Management and Works, as amended;</i></p> <p><i>2.8.4 IWDF Operational Procedure OP-05, Waste Loading and Transport, Government of Western Australia, Department of Finance Building Management and Works, as amended;</i></p> <p><i>2.8.5 IWDF Operational Procedure OP-06, Waste Delivery, Acceptance and Disposal, Government of Western Australia, Department of Finance, Building Management and Works, as amended;</i></p> <p><i>2.8.6 IWDF Operational Procedure OP-10, Operation Site Safety Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;</i></p> <p><i>2.8.7 IWDF Operational Instruction OI-01, Waste Inspection, Government of Western Australia, Department of Finance Building Management and Works, as amended.</i></p>	<p>In compliance – although a radioactive waste disposal did not occur, where applicable, aspects of the IWDF guidelines, procedures and instructions were implemented as part of ongoing management of the IWDF.</p> <p>See tables 6, 7, and 8 of this PCR.</p>
<p>SPECIAL CONDITIONS</p> <p>1. Inventory locations of material at Mount Walton East (IWDF) are outlined as follows -</p> <ul style="list-style-type: none"> • 92RS01: Final Report on disposal of low-level radioactive waste at the IWDF east of Mt Walton. Environmental Health Branch • 92RS02: Disposal of second batch of radioactive waste at the IWDF, Mt Walton, Katee Enterprises, July 1994 	<p>In compliance – all documents listed are specified on the Department of Finance R&D schedule.</p>

Conditions, Restrictions and Limitations	Compliance Status / Comment
<ul style="list-style-type: none"> • 94RT01: Radiological Aspects of the acceptance and burial of CSBP & Farmers Ltd radioactive waste at Mt Walton East, Katee Enterprises, July 1994 • 2000RT01: 1999 Annual Radiation Report: Operations of the IWDF Mt Walton East, WM(WA), June 2000 • 2002RT01: 2002 Annual Radiation Report; Operations of the IWDF Mt Walton East, WM(WA) • Report EP2008-154 Performance and Compliance Report: Intractable Waste Disposal Facility Mt Walton East, Coffey Environments, December 2008. 	
<p>2. The full inventory of items buried at the IWDF is to be available on a database maintained by the Registrant</p>	<p>In compliance – a complete inventory of all radioactive materials disposed of at the IWDF is available in the IWDF Waste Inventory Database maintained by the Registrant.</p>

3.5 ASNO Permit to Possess Nuclear Material

Australia has enacted the *Nuclear Non-Proliferation (Safeguards) Act 1987* to ensure that international obligations are met under the Nuclear Non-Proliferation Treaty (NPT).

The Australian Safeguards and Non-Proliferation Office (ASNO), the department with responsibility for implementing the requirements of the *Nuclear Non-Proliferation (Safeguards) Act 1987* is located within the Federal Department of Foreign Affairs and Trade portfolio.

The *Nuclear Non-Proliferation (Safeguards) Act 1987* is concerned with nuclear materials such as uranium, thorium, and plutonium. As there are small quantities of thorium and uranium disposed of at the IWDF, the facility is required to have a current permit to possess nuclear material.

On 19 October 2020, pursuant to section 13 of the *Nuclear Non-Proliferation (Safeguards) Act 1987*, the Director General ASNO issued a renewed Class L2 permit, PN207, (including a Compliance Code) which took effect on 30 October 2020.

The main reporting requirement of the renewed and updated permit PN207 (Appendix D) is to submit to ASNO reports describing approved building(s)/location(s) by 15 March each year and report an inventory of all nuclear material, due 5 July of each year.

As of 2018, the annual inventory report must be provided via an online process in the NUMBAT database portal. The online process replaces the old Form ASO310 “Inventory Listing (Nuclear Materials and Associated Materials)”.

3.5.1 Compliance Statement

Table 4 details compliance with the reporting requirements of the permit to possess nuclear material, PN207, issued for the IWDF.

Table 4
ASNO Permit PN207 2020 – 2021 Compliance Statement

Reporting Requirements	Compliance Status
<p><i>ASO310 Inventory Listing</i></p> <p>The inventory period is to be closed on 30 June each year and this form is to be submitted to ASNO by 5 July of the same year.</p>	<p>In compliance – Annual Inventory Listing was reported via NUMBAT on 3 July 2020 – see Appendix I.</p>
<p><i>ASO316 Description of each building</i></p> <p>This information is required to enable ASNO to meet Australia's reporting obligations under Articles 2a (iii) of the International Atomic Energy Agency's Additional Protocol (INFCIRC/540). The details provided must describe the most up to date situation - as at 31 December for the previous year - emphasising any changes that have taken place since the previous report. This information must be provided to ASNO by 15 March every year.</p>	<p>In compliance – ASO316 was submitted to ASNO on 16 February 2021 See Appendix J for copy of email containing ASO316 as submitted to ASNO.</p>

3.6 Ministerial Statement 562

3.6.1 Compliance Statement

Table 5 provides an audit table detailing compliance status and comment for each of the conditions and proponent commitments contained within Ministerial Statement 562.

The evidence presented in Table 5 demonstrates that for the reporting period the management of the IWDF has been, where applicable, in compliance with the requirements of Ministerial Statement 562 (Appendix A).

Table 5
Statement 562 Ministerial Conditions and Proponent Commitments 2020 – 2021 Compliance

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
MINISTERIAL CONDITIONS								
MC 1.1	Implementation	Subject to these conditions and procedures, the proponent shall implement the proposals as documented in schedule 1 of this statement [Appendix A of Statement 562].	Ongoing	EPA		Approved PCR	Satisfactory during this period	Evidence is provided in this PCR – Section 5 and Tables 6, 7 & 8. Implementation of proposal is via approval of individual disposal operations and ongoing monitoring.
MC 1.2	Implementation	Where the proponent seeks to change any aspect of the proposal as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the EPA, is substantial, the proponent shall refer the matter to the EPA.	Upon any substantial operational change.	Minister for the Environment	EPA	Proposal for change submitted to EPA	Not required at this stage	The proponent did not seek to change any aspect of the proposal as documented in schedule 1 during this reporting period.
MC 1.3	Implementation	Where the proponent seeks to change any aspect of the proposals as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the EPA, is not substantial, those changes may be effected.	Upon any operational change.	Minister for the Environment	EPA	Approved proposal	Refer MC 1.2	See above.
MC 2.1	Proponent Commitments	The proponent shall implement the environmental management commitments of 25 October 2000, as documented in schedule 2 of this statement.	Ongoing	Minister for the Environment	EPA	Approved PCR	Progress ongoing	This PCR – Section 5 and Tables 6, 7 & 8.
MC 2.2	Proponent Commitments	The proponent shall implement subsequent environmental management commitments, which the proponent makes as part of the fulfilment of conditions and procedures in this statement.	Upon fulfilment of conditions and procedures.	Minister for the Environment	EPA	Approved PCR	Progress ongoing	See Tables 6, 7 & 8 for implementation and compliance status of environmental management commitments.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
MC 3.1	Proponent	The proponent for the time being nominated by the Minister for the Environment under section 38 (6) or (7) of the <i>Environmental Protection Act 1986</i> is responsible for the implementation of the proposals until such time as the Minister for the Environment has exercised the Minister's power under section 38(7) of the Act to revoke the nomination of that proponent and nominate another person in respect of the proposals.	Upon Ministers direction/ change of proponent	Minister for the Environment		Approved Proponent	See MC 3.3	
MC 3.2	Proponent	Any request for the exercise of that power of the Minister referred to in conditions 3.1 shall be accompanied by a copy of this statement endorsed with an undertaking by the proposed replacement proponent to carry out the proposals in accordance with the conditions and procedures set out in the statement.	Upon Ministers direction/ change of proponent	Minister for the Environment		Endorsed Statement	See MC 3.3	
MC 3.3	Proponent	The proponent shall notify the EPA of any change of proponent name and address.	Within 30 days of such change	EPA		Notification	N/A	No change of Proponent name and address occurred during reporting period.
MC 4.1	Commencement	The proponent shall provide evidence to the Minister for the Environment within 5 years of the date of this statement that the proposals have been substantially commenced.	Within 5 years of Statement (i.e., before 1 February 2006)	Minister for the Environment		Approved PCR	Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.
MC 4.2	Commencement	Where the proposals have not been substantially commenced within 5 years of the date of this statement, the approvals to implement the proposals as granted in this statement shall lapse and be void. The Minister for the Environment will determine any question as to whether the proposals have been substantially commenced.	Within 5 years of Statement (i.e., before 1 February 2006)	Minister for the Environment			Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
MC 4.3	Commencement	The proponent shall make application to the Minister for the Environment for any extension of approval for the substantial commencement of the proposals beyond five years from the date of this statement at least six months prior to the expiration of the five-year period referred to in conditions 4.1 and 4.2.	At least 6 months prior to end of 5-year period (i.e., before 1 August 2005)	Minister for the Environment		Proponent Application	Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.
MC 4.4	Commencement	Where the proponent demonstrates to the requirements of the Minister for the Environment on advice of the EPA that the environmental parameters of the proposals have not changed significantly, then the Minister may grant an extension not exceeding five years for the substantial commencement of the proposal.	Within 5 years of Statement (i.e., before 1 February 2006)	Minister for the Environment	EPA	Proponent Submission	Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.
MC 5.1	Compliance Auditing	The proponent shall submit periodic Compliance reports, in accordance with an audit program prepared in consultation between the proponent and the EPA.	Periodic	Minister for the Environment	EPA	Submitted PCR	In compliance	As a disposal operation did not occur during the reporting period submission of the 2020-2021 PCR to the EPA is not required. The 2020-2021 PCR will be submitted to the RCWA and the DWER.
MC 5.2	Compliance Auditing	Unless otherwise specified, the EPA is responsible for assessing compliance with conditions, procedures and commitments contained in this statement and for issuing formal written advice that the requirements have been met.		EPA		PCR submitted to EPA		Noted.
MC 5.3	Compliance Auditing	Where compliance with any condition, procedure or commitment is in dispute the matter will be determined by the Minister for the Environment.		Minister for the Environment		PCR submitted to EPA		See above.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PROPONENT COMMITMENTS								
PC 1.1	Environmental Management System (EMS)	Demonstrate that there is in place an EMS that includes the following elements: (a) an environmental, health and safety policy and corporate commitment to it; (b) mechanisms and processes to ensure: <ul style="list-style-type: none"> • Planning to meet environmental, health and safety requirements; • Implementation and operation of actions to meet environmental, health and safety requirements; • Measurement and evaluation of environmental, health and safety performance; and (c) review and improvements of environmental, health and safety outcomes.	Prior to the next disposal operation.	EPA		Completed EMS	Cleared	EMS approved by the EPA 24 April 2002.
PC 1.2	Environmental Management System	Implement the EMS required by commitment 1.1.	Prior to the next disposal operation.	EPA		PCR	In compliance	See Tables 6 and 7 of this PCR for details of implementation status of EMS.
PC 2.1	Environmental Management Program	Prepare an Environmental Management Program.	Prior to the next disposal operation.	EPA		Approved Environmental Management Program	Cleared	EMP was approved by the EPA 24 April 2002.
PC 2.2	Environmental Management Program	Advertise and make the approved Environmental Management Program required by commitment 2.1 publicly available.	Prior to the next disposal operation.	EPA		PCR	Cleared	by EPA 24 April 2002.
PC 2.3	Environmental Management Program	Implement the Environmental Management Program required by commitment 2.1.	During all disposal operations.	EPA		PCR	In compliance	See Table 8 of this PCR for details of implementation status of environmental management program.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 3.1	Environmental Management Plans - Flora and Fauna	Prepare a Flora and Fauna Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.2	Transport Management Plan	Prepare a Transport Management Plan that describes the general principles of managing the transportation of wastes to the Intractable Waste Disposal Facility. The plan will include but not limited to: <ul style="list-style-type: none"> • emergency preparedness; • contractor; responsibilities; • procedures; • communications; and • emergency response recovery. 	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.3	Water Management Plan	Prepare a Water Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.4	Emergency Response Management Plan	Prepare an Emergency Response Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.5	Health and Safety Management Plan	Prepare a Health and Safety Management Plan.	Prior to the next disposal operation	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.6	Air Quality Management Plan	Prepare an Air Quality Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 3.7	Radiation Management Plan	Prepare a Radiation Management Plan which will include but not be limited to: <ul style="list-style-type: none"> environmental radiation monitoring; periodic reporting to the EPA and RCWA procedures for compliance with the Code of Practice for the Near-surface Disposal of Radioactive Waste in Australia (1992); personnel radiation monitoring; and reporting of the monitoring results to the Community Liaison Committee. 	Prior to the next disposal operation.	EPA	RCWA	Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.8	Decommissioning and Rehabilitation Management Plan	Prepare a Decommissioning and Rehabilitation Management Plan to include but not be limited to: <ul style="list-style-type: none"> removal or, if appropriate, retention of infrastructure; rehabilitation of all disturbed areas to a standard suitable for agreed future land use/s; and identification of disposal areas, including provision of evidence of notification to relevant statutory authorities. 	At least six months before decommissioning	EPA	RC	Approved Environmental Management Plan	In progress	A preliminary Operational Decommissioning and Rehabilitation Management Plan which addresses specific decommissioning and rehabilitation issues was approved on 23 April 2002.
PC 3.9	Environmental Management Plans	Make the draft Environmental Management Plans required by commitment 3.1 to 3.8 available for a four-week limited stakeholder review to the: <ul style="list-style-type: none"> IWDF Community Liaison Committee; The Chamber of Minerals and Energy of Western Australia; and Chamber of Commerce and Industry of Western Australia; prior to the EPA finalising its consideration of the Plans	Prior to next disposal operation.	EPA		Approved Environmental Management Plans	Cleared	by EPA 24 April 2002.
PC 3.10	Environmental Management Plans	Advertise and make the approved Environmental Management Plans required by commitments 3.1 to 3.8 publicly available.	Prior to next disposal operation.	EPA		PCR	Cleared	by EPA 24 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 3.11	Environmental Management Plans	Implement the Environmental Management Plans required by commitments 3.1 to 3.8.	During each disposal operation.	EPA		PCR	In compliance	See Table 8 of this PCR.
PC 4.1	Operational Guidelines - Waste Acceptance	Prepare the Waste Acceptance Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.2	Environmental	Prepare the Environmental Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.3	Safety/Emergency Response	Prepare the Safety/Emergency Response Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.4	Transport	Prepare the Transport Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.5	Radiation	Prepare the Radiation Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.6	Operational Guidelines	Make the draft Operational Guidelines required by commitments 4.1 to 4.5 available for a four-week limited stakeholder review to the: <ul style="list-style-type: none"> • IWDF Community Liaison Committee; • The Chamber of Minerals and Energy of Western Australia; and • Chamber of Commerce and Industry of Western Australia; prior to the EPA finalising its consideration of the Plan.	Prior to next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.7	Operational Guidelines	Advertise and make the approved Operational Guidelines required by commitments 4.1 to 4.5 publicly available.	Prior to next disposal operation.	EPA		PCR	Cleared	by EPA 24 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 4.8	Operational Guidelines	Implement the approved Operational Guidelines required by commitments 4.1 to 4.5.	During each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.
PC 5.1	Operational Procedures - Environmental, Radiation, Health & Safety	Prepare the Environmental, Radiation, Health and Safety Operational Procedures in accordance with the Operational Guidelines.	Prior to each disposal operation.	EPA		Approved Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 5.2	Transport	Prepare the Transport Operational Procedures in accordance with the Operational Guidelines to include but not limited to: <ul style="list-style-type: none"> • details of waste loading and transport activities, and emergency response training for personnel; • identification of responsibility for the various aspects of transport, loading and unloading operations; • contingency plans for dealing with fire safety, accidents, spillages, vehicle breakdowns and other incidents should they occur; and • the procedure for liaison with the local community and emergency services. 	Prior to each disposal operation.	EPA		Approved Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 5.3	Operational Procedures	Advertise and make the approved Operational Procedures required by commitments 5.1 and 5.2 publicly available.	Prior to each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.
PC 5.4	Operational Procedures	Implement the Operational Procedures required by commitments 5.1 to 5.2.	During each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 6.1	Performance and Compliance Report	Prepare the Performance and Compliance Report at the conclusion of each waste disposal operation.	Within three months following completion of each specific waste disposal operation.	EPA	RCWA in relation to radiation issues	Approved PCR	In compliance	EPA endorsed 2019 -2020 PCR 4 May 2021. See Appendix G for EPA endorsement of the 2019 – 2020 PCR (including 2020NRT01 Disposal Close-out Report.
PC 6.2	Performance and Compliance Report	Advertise and make the approved Performance and Compliance Report required by commitment 6.1 publicly available.	Within 4 weeks of obtaining approval for the PCR.	EPA		Advertisement of approved PCR	In compliance	Advertisement was placed in West Australian and Kalgoorlie Miner newspapers 31 May 2021. See Appendix K.
PC 7.1	Waste	Limit disposal of waste at the Intractable Waste Disposal Facility to waste generated in Western Australia (see commitment 4.1).	Prior to each disposal operation.	EPA		Environmental, Radiation, Health and Safety Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 7.2	Waste	Ensure that approval to dispose of any specific waste is conditional on a review of currently practicably available waste treatment, disposal, or management alternatives in Australia (see commitment 4.1).	Prior to each disposal operation.	EPA		Environmental, Radiation, Health and Safety Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 7.3	Waste	Prepare a waste register data base to be maintained, updated, and made publicly available at the office of the proponent or on the World Wide Web.	Prepare the waste register data base within six months of the issuing of the Minister's Statement that the proposal may be implemented and update the register within three months of completion of each disposal operation.	EPA		PCR/Waste Register Database	In compliance	The waste register / database was updated to include the waste disposed within three months of completion of Disposal Operation 2020NRT01. See Appendix L for details of the 2020NRT01 disposal extracted from the IWDF Waste Inventory Database.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 8	Community Liaison	Convening a minimum of four meetings a year of the Community Liaison Committee.	Following the Minister's Statement that the proposal may be implemented.	EPA		PCR	In compliance	CLC meetings were held 24 October 2020, 8 December 2020, 1 April 2021, and 10 June 2021. See Appendix M for meeting minutes.
PC 9	Fencing and Signposting	Fence and signpost each discrete disposal cell.	Prior to demobilisation of each waste disposal operation following the Minister's Statement that the proposal may be implemented.	EPA		PCR	In compliance	Each disposal cell at the IWDF has been fenced and continues to be fenced. Fencing can be seen in Appendix N October 2020 rehabilitation monitoring.
PC 10	Water	Demonstrate that there are at least 5 metres of clay between the base of any disposal cell and bedrock.	Prior to each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.
PC 11	Transport and Packaging	Where transport and packaging is to be undertaken by a party other than the proponent, the proponent will ensure that the packaging and transport requirements specified in the Operational Transport Guidelines and Waste Acceptance Guidelines are adhered to through the use of contracts and other controls as necessary (see commitments 4.1 and 4.4).	Prior to the commencement of transportation activities during each disposal operation.	EPA		Approved Operational Transport Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 12	Decommissioning and Rehabilitation	Implement the requirements of the Decommissioning and Rehabilitation Management Plan until the Minister for the Environment determines that decommissioning and/or rehabilitation is/are complete.	During decommissioning and/or rehabilitation	Minister for the Environment		Determination by the Minister for the Environment that decommissioning and/or rehabilitation is/are complete.	Not required at this stage	The IWDF is operational.

4. ENVIRONMENTAL, HEALTH AND SAFETY AND QUALITY MANAGEMENT SYSTEMS

4.1 Overview

The IWDF Environmental, Health and Safety and Quality Management System (EHSQMS), as required by Ministerial Statement 562 Proponent Commitment No. 1, is designed to identify areas of actual or potential environmental risk resulting from activities at the IWDF, and to formulate procedures and objectives which minimise or eliminate these risks.

The IWDF EHSQMS consists of two separate but integrated management systems. The Finance management system details the high-level management requirements for the IWDF, and the FMC management system details the management requirements for the IWDF site. Both systems consist of management manuals, procedures, work instructions and associated forms which provide guidance for all activities related to the management and the ongoing operational activities of the IWDF.

4.2 Management Manuals and Procedures

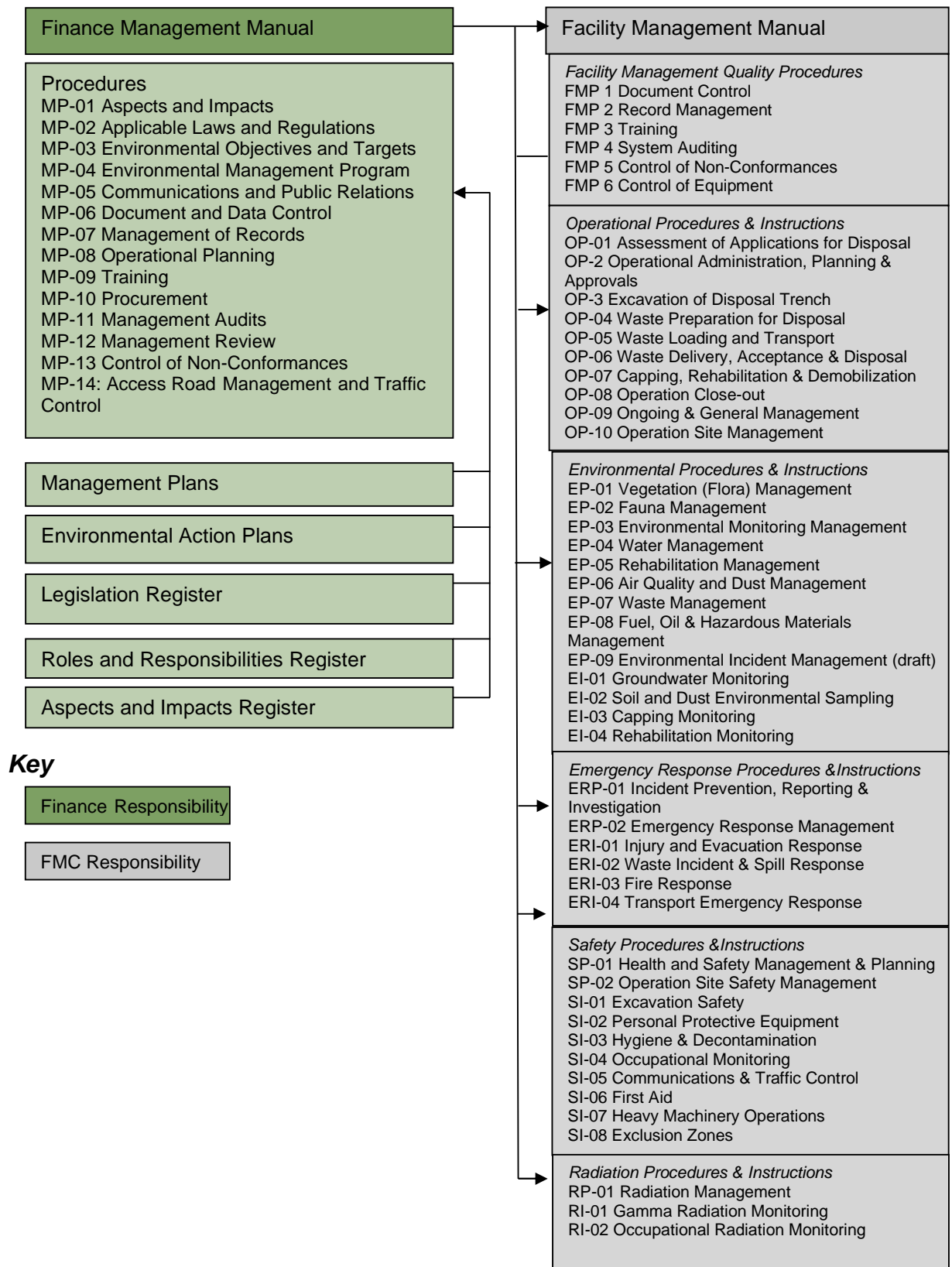
There are two management manuals which contain essential information about the management of the IWDF and provide an overview of the systems; these two manuals are provided as Appendix O and are described below.

Finance's management and policy manual provides details on the IWDF site and an overview of the components of the management system and how they are integrated.

The FMC management manual highlights the FMC's status and details the structure of the FMC procedures and their interaction with Finance's system.

Figure 3 provides a diagrammatic explanation to the inter-relationship between the Finance management system and the FMC IWDF management system.

Figure 3
IWDF EHSQMS Manuals, Procedures Structure and Relationship



4.2.1 Finance Management System Compliance Audit

Table 6 documents the results of an internal compliance audit of Finance's EHSQMS Procedures for the reporting period.

No noncompliances were recorded for the reporting period.

Table 6
Finance Environmental, Health and Safety and Quality Management System 2020 - 2021 Internal Compliance Audit of Procedures

Section	Requirement	Status	Evidence / Comment
Procedure: MP-01 Aspects and Impacts			
4.2	Environmental, health and safety, socio-political and legal aspects from normal, abnormal, and emergency situations have been considered when identifying aspects and impacts.	In compliance	Aspects and Impacts Register address environmental, health and safety, socio-political and legal aspects. See Appendix P for 2020/2021 register.
4.2	The aspects and impacts register has considered aspects from excavation, operational planning, transport, waste inspection and acceptance, monitoring, surface and groundwater management and emergency response activities.	In compliance	Aspects and Impacts Register addresses aspects from excavation, operational planning, transport, waste inspection and acceptance, monitoring, surface and groundwater management and emergency response activities. See Appendix P.
4.3	Each aspect and impact has been assigned a likelihood and consequence value.	In compliance	A review of the Aspects and Impacts Register showed that each aspect and impact has been assigned a likelihood and consequence value. See Appendix P.
4.3	A risk value has been established for each aspect and impact.	In compliance	A review of the Aspects and Impacts Register confirmed that a risk value has been established for each aspect and impact. See Appendix P.
4.3	The level of risk for each aspect and impact has been derived from the product of likelihood and consequence.	In compliance	A review of the Aspects and Impacts Register demonstrated that the level of risk for each aspect and impact has been derived from the product of likelihood and consequence. See Appendix P.
4.3	Significant aspects have been identified.	In compliance	Register was reviewed September 2020 and May 2021 by FMC Project Manager. It was verified that all significant

Section	Requirement	Status	Evidence / Comment
			aspects for the operation of the IWDF had been identified. See Appendix P.
4.4	The Aspects and Impacts Register has been reviewed annually and prior to an operation or following significant impact or change.	In compliance	Aspects and Impacts Register was reviewed September 2020 and May 2021. See Appendix P.
Procedure: MP-02 Applicable Laws, Regulations, and other Requirements			
4.1	In the identification of legislation, the relevant regulatory authorities, legal experts and site conditions and commitments have been consulted	Not able to verify	The register was compiled in 2000 but there is no evidence that legal experts were consulted
4.2	Principal legislation has been divided into State and Commonwealth and other requirements such as relevant guidelines and codes of practice	In compliance	A review of Register confirmed that principal legislation has been divided into State and Commonwealth. See Appendix Q.
4.3	Legal registers have been reviewed annually and prior to each disposal operation, and have considered new and amended legislation and changes to the IWDF's activities	In compliance	The Register was reviewed in February 2021 – see Appendix Q.
4.3	The FMC Project Manager shall consult the following sources during this review: <ul style="list-style-type: none"> • Government Gazette • Australasian Legal Information Institute (Austlii) for Cwth legislation • Western Australian Legislation – State Law Publisher (SLP) 	In compliance	Review of IWDF document library demonstrated that legislation updates were retrieved from all available sources.
4.3	A copy of relevant new or amended legislation has been downloaded and placed in the Legislation folder of the document library.	In compliance	A review of the folder demonstrated that new versions, where applicable, of legislation are downloaded to the document library legislation folder.

Section	Requirement	Status	Evidence / Comment
4.3	Obsolete copies of legislation are removed from the document library.	In compliance	A review of the legislation folder of the document library demonstrated the superseded version of legislation is deleted. Superseded legislation is no longer archived as copies of superseded legislation are held by State Law Publisher for State legislation and other databases for Commonwealth legislation.
4.3	The implications of new or amended legislation has been determined and presented at a Management Review Meeting.	N/A	No new/amended legislation was added to the register during the reporting period.
4.4	<p>Proposed changes to applicable requirements or the establishment of new legislation applicable to the management of the IWDF shall be tracked to ensure Finance:</p> <ul style="list-style-type: none"> • has an opportunity to provide input into proposed changes which may affect its operations; and • can plan and implement any changes in a timely and cost-effective manner. 	In compliance	Proposed changes to applicable requirements or the establishment of new legislation were tracked by the FMC Project Manager who kept Finance updated at monthly management meetings and the management review meetings. See Appendix R for minutes of Management Review Meetings held during reporting period.
Procedure: MP-03 Objectives and Targets			
4.2.1	The environmental and health and safety policy and significant aspects and impacts have been considered in the development of management objectives	In compliance	A review of the management objectives as documented in the management plans demonstrated that the environmental health and safety policy and significant aspects and impacts have been considered in the development of the management objectives. See Appendix E for Management Plans.

Section	Requirement	Status	Evidence / Comment
4.2.1	Management objectives have been placed in the relevant management plan	In compliance	Review of the management plans (Appendix E) verified that where applicable, management objectives have been placed in the Environmental, Health and Safety Policy Statement section of the relevant management plan.
4.2.2	Targets are specific, realistic, achievable, practical and quantifiable	In compliance	Review of the management plans confirmed that targets were specific, realistic, achievable, practical, and quantifiable. See Appendix E.
4.3.1	Improvement objectives have been based on deficiencies in management controls, new technologies and practices and changes to the IWDF's activities	In compliance	Where appropriate, improvement objectives were based on outcomes of the internal audits, best practice technologies and any changes to IWDF activities.
4.3.2	Improvement targets are based on improvement objectives	In compliance	Review of the management plans confirmed that where applicable, targets were based on improvement objectives – see Appendix E for 2020 - 2021 Management Plans.
4.3.2	Improvement targets are specific, quantifiable, and achievable and have a start and completion date, personnel allocations and detail the required actions	In compliance	See Appendix E for Management Plans.
4.3.2	Improvement targets are detailed in the action plans	In compliance	See Appendix S for Action Plans.
Procedure: MP-04 Environmental, Health and Safety Management Program			
4.3	Each management plan details the relevant policy, management goal, management target, management program, improvement program, relevant documents and procedures, forms, performance monitoring, reporting and key responsibilities.	In compliance	Review of management plans confirmed that each management plan details the relevant policy, management goal, management target, management program, improvement program, relevant documents and

Section	Requirement	Status	Evidence / Comment
			procedures, forms, performance monitoring, reporting and key responsibilities. See Appendix E.
4.4	Action plans contain a policy aim, improvement target, improvement objective, action requirements, responsible personnel, completion date and records of achievement.	In compliance	See Appendix S for Action Plans.
4.5.1	Management plans have been reviewed every 6 months and / or following significant changes to activities at the IWDF or the identification of new significant aspects	In compliance	Management Plans were reviewed and updated Nov 2020 and May 2021. See Appendix E for Management Plans.
4.5.1	Changes to management plans have been reported at the Management Review Meetings (MRM)	In compliance	Changes to Management Plans were reported at the MRMs, held 24 Nov 2020 and 03 Jun 2021. See Appendix R for minutes.
4.5.2	Action plans have been reviewed monthly and progress towards achievement reported at a Management Review Meeting	In compliance	Action Plans were reviewed monthly at the monthly ongoing management meetings. Monthly meetings were held, 2 Jul, 6 Aug, 2 Sep, 1 Oct, 5 Nov, 9 Dec 2020, 11 Feb, 9 Mar, 8 Apr, 6 May, and 3 Jun 2021. Progress towards achievement reported at Management Review Meetings. See Appendix R.
Procedure: MP-05 Communications and Public Relations			
4.2	Various types of internal communication have been used	In compliance	Communication is mainly via email but where appropriate formal letters are used. Review confirmed formal letters are sent on Finance letterhead, are recorded on the Finance Records Management System, and are electronically filed in the IWDF Project Folder on Finance server.

Section	Requirement	Status	Evidence / Comment
4.3	All quality critical communications are legible, verifiable, and correctly formatted	In compliance	Review of critical communication confirmed that all quality critical communications meet Finance quality requirements and are approved or signed by Finance Project Manager or Project Director.
4.3.1	All written communications are recorded in a manner consistent with MP-06	In compliance	Review confirmed that all written communications were recorded in a manner consistent with MP-06.
4.4	Complaints have been investigated, non-conformance recorded, and the complaint entered into the complaints register	N/A	No complaints were received during reporting period.
4.5	Large scale external communications have been referred to the IWDF Project Director	In compliance	Response/Action Plan for the ARPANSA review of Safety Assessment was referred to the Finance IWDF Project Director before submission to the RCWA.
4.5	Media releases have been developed in consultation with public affairs	In compliance	Interview with the Project Director confirmed that no significant media releases were developed during reporting period, but all advertisements during the reporting period have been reviewed by Finance's Communication Unit.
Procedure: MP- 06 Document and Data Control			
4.2	Documents have been managed as specified in the document control matrix	In compliance	All Finance documents have been managed as specified in the document control matrix – master system documents are now managed by the FMC on the FMC server with offsite backup.
4.3	Controlled documents have been registered on the Finance Records Management System	In compliance	All controlled documents are registered on the Finance Records Management System. See Appendix R

Section	Requirement	Status	Evidence / Comment
			Management Review Meetings minutes, Section 4.3 of November 2020, and Section 3.5 of June 2021 minutes.
4.4	Controlled documents have been distributed according to the Document Control Matrix	In compliance	Inspection confirmed that controlled documents created during the reporting period have been added to the Document Control Matrix – evidence too large and varied to be included in this PCR.
4.4	If document is distributed by email an e-copy of the email should be saved into the relevant folder as evidence of distribution.	In compliance	Review demonstrated that controlled documents were distributed via email and the emails are saved in an email correspondence folder, for example, the waste enquiry folder.
4.5	Revisions of documents have been distributed according to the Document Control Matrix	In compliance	Revisions of controlled documents have been circulated by email and are saved in the appropriate folder on the FMC server.
4.5	As hardcopy is no longer used document approval shall be indicated by making the electronic version 'final' and password protecting the document. The Document Control Matrix (Finance-MF-06-2) indicates at which location the final version of a document is retained.	In compliance	Inspection confirmed that all controlled documents are held at the location specified in the Document Control Matrix. See Appendix T for Document Control Matrix.
4.5	The Document Control Matrix details the document preparer, reviewer, approver, controller, and location for each document	In compliance	See Appendix T for Document Control Matrix
4.5	All documents have a revision number on cover page and in the header or footer	In compliance	Review confirmed that all documents, except a few unused forms, include a revision number in the footer – too many documents to be included as evidence.

Section	Requirement	Status	Evidence / Comment
4.5	External documents have been reviewed during planning for each disposal operation to ensure they are up to date	N/A	No disposal operation occurred during reporting period but all external documents such as legislation, standards and codes of practice were reviewed as part of the of the Legal and Other Requirements Register review. See Appendix Q.
4.8	Master copies of documents have been stored in the correct location, as outlined in Document Control Matrix	In compliance	All master copies are stored in electronic format on the FMC server and are emailed to Finance where they are saved to Finance’s IWDF project folder.
Procedure: MP-07 Management of Records			
4.2.1	<p>Incoming Correspondence All incoming correspondence (including critical emails, letters, and other documents), shall be entered into the Finance corporate recordkeeping system. The following information shall be noted on the correspondence and entered on the database:</p> <ul style="list-style-type: none"> • date; • received by; • initial distribution (for action); and • file number. 	In compliance	The Finance IWDF Project Director confirmed that all critical correspondence is included on Finance Records Management System. See Appendix R Section 4.3 of Nov 2020 minutes.
4.2.2	<p>All critical, outgoing correspondence (including letters, critical emails, faxes, and documents) shall be entered onto the Finance corporate recordkeeping system database.</p> <p>At a minimum the following information shall be recorded in the Finance corporate recordkeeping system:</p> <ul style="list-style-type: none"> • recipient details; • file number; • author; 	In compliance	See above

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • subject; • date sent; and • correspondence type. <p>A unique Finance corporate recordkeeping system number will be allocated, and this number shall be referenced on the correspondence. A copy of all outgoing correspondence shall be placed on the appropriate file.</p>		
4.3	<p>All incoming and a copy of all outgoing communication, including letters, critical emails, faxes, reports, and records of telephone conversations, will be filed on the appropriate Finance Records Management System IWDF file.</p> <p>All IWDF files will then be stored in accordance with Department of Finance Record Keeping Policy.</p>	In compliance	Finance Project Director confirmed communications are appropriately stored. See Appendix R Section 4.3 of Nov 2020 minutes.
4.3.1	Electronic files are routinely backed up as part of the government department backup procedures	In compliance	Interview confirmed that all critical documents are backed up daily as part of the Department of Finance backup routine.
4.4	Archiving & Storage of Records		
4.4.1	<p><i>Identifying Documents for Archiving</i></p> <p>All records will be assessed for their importance in the following areas prior to being filed:</p> <ul style="list-style-type: none"> • Legislative and regulatory requirements; • Compliance assessments; • Identification and management of environmental aspects and their associated impacts; • Training 	In compliance	Auditor reviewed the Department of Finance Retention and Disposal Schedule (approved by State Records Commission March 2014) which includes all appropriate IWDF documents. See Appendix H for extract of IWDF records from R&D Schedule.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • Audit and review records; • Monitoring data; • Details of non-conformances; and • Public information/record. <p>The Finance IWDF Project Manager, in consultation with the Senior Records Officer will determine if the document should be retained and the retention period, in accordance with 4.4.3.</p>		
4.4.2	<p>Archiving Schedule</p> <p>The Department of Finance Retention and Disposal Schedule has been developed based on 4.4.1 and details the types of documents which must be retained.</p> <p>This R&D schedule will be reviewed annually, and any new document types added. Any changes to the archiving schedule will be detailed at the Management Review Meeting and a copy of the new schedule sent to the Facility Management Contractor.</p> <p>All records on the archiving schedule will be managed as specified in the schedule.</p>	In compliance	<p>The Department of Finance Retention and Disposal Schedule (approved by State Records Commission March 2014) includes all appropriate IWDF documents. The Finance IWDF Project Director confirmed that the relevant IWDF content in the R&D schedule is reviewed annually. See Appendix H for extract detailing IWDF records from R&D Schedule. See Appendix R Section 4.3 for evidence of annual R&D Schedule review.</p>
4.4.3	<p>Establishing Retention Periods</p> <p>The retention period of specific records is dependent upon:</p> <ul style="list-style-type: none"> • regulatory requirements; • nature of the records; • potential liability and insurance purposes; and • physical nature of the record. 	In compliance	<p>The Department of Finance Retention and Disposal Schedule (approved by State Records March 2014) includes all appropriate IWDF documents and contains appropriate retention periods. See Appendix H for extract detailing IWDF records from R&D Schedule.</p>

Section	Requirement	Status	Evidence / Comment
	<p>The retention period of management records will be determined by the Finance IWDF Project Manager and shall be in accordance with Finance procedures and documented in the State Records Commission approved Retention and Disposal Schedule.</p>		
4.4.4	<p>Storage of Records Archived records shall be retained in a secure and easily accessible location, which prevents deterioration and damage, for a predetermined retention period.</p> <p>Details of all archived records and their storage shall be detailed in the Department of Finance Retention and Disposal Schedule which is kept on the relevant IWDF file and a copy retained in the IWDF Electronic Document Library.</p> <p>For each record the following information shall be recorded:</p> <ul style="list-style-type: none"> • description or title; • master record location (including file number if applicable); • officer responsible for retention of that record; and • retention period; <p>All records shall be assessed by the responsible person for clarity and completeness prior to storage. If records are found to be inadequate, they shall be updated prior to storage.</p>	N/A	<p>No documents have been archived by Finance to the State Records Office, as required by the Finance R&D Schedule, due to storage restrictions at State Records Office.</p> <p>The state archives (WA State Records Office) with the responsibility for providing record keeping services to the WA government have been closed for submissions for many years and although now has some increased capacity are only taking limited submissions for records over 25 years old and where the responsible party can no longer preserve them. The IWDF site records are kept at RCWA and the Department of Finance.</p> <p>Both the RCWA and Finance have legislated government archiving requirements under the <i>State Records Act 2000</i> which outlines the requirements of government for the keeping of State records by government. Under the current Act electronic records designated as State archives are to remain in the custody of the agency that created or managed them. These records must be managed in accordance with SRC Standard 8 – Managing Digital Information. As almost all the IWDF records are in electronic format they are required to continue to be held by the RCWA and Finance.</p>

Section	Requirement	Status	Evidence / Comment
			The Department of Finance's Retention and Disposal Schedule will ensure compliance with the RHS 35 requirement into the future and provides evidence that the requirement of paragraph 3.2.7 is being implemented as far as possible.
4.5	The waste volume, type, owner, packaging, trench design and reports for each disposal operation have been entered into the IWDF's public access database.	In compliance	The IWDF Waste Inventory Database was updated to include waste disposed during the 2020NRT01 disposal. See Appendix L for Excel extract from Database detailing the 2020NRT01 disposal.
Procedure: MP-08 Operational Planning			
4.1	An information package containing waste acceptance guidelines, Waste Proforma and background information has been sent to all potential waste disposers.	In compliance	Review of waste enquiry folder managed by the FMC confirmed that all potential waste disposers have been provided, via email, an information package containing waste acceptance guidelines, waste proforma and background information.
4.1	A completed Waste Proforma has been provided by all waste disposers and forwarded to FMC & RSO.	In compliance	Review of waste enquiry folder managed by the FMC confirmed all Waste Acceptance Proformas submitted during reporting period have been forwarded to the FMC and RSO for assessment.
4.1	A non-refundable deposit and signed waste disposal agreement has been received from all waste disposers.	N/A	No disposal operation occurred during reporting period.
4.2	Weekly project planning meetings have been held during disposal operations.	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
4.2	Operational procedures and other documentation have been prepared by the FMC and forwarded to the EPA and Radiological Council for approval	N/A	No disposal operation occurred during reporting period.
4.3	The condition of the access road has been determined and maintenance organised	In compliance	The condition of the access road is assessed twice yearly. See Appendix U for Oct 2020 and Apr 2021 Access Road condition reports.
4.3	Inspections of waste packaging have been undertaken .	N/A	No disposal operation occurred during reporting period.
4.3	Surrounding community and emergency services have been informed of the planned operation including transport routes, dates, and waste consignments.	N/A	No disposal operation occurred during reporting period.
4.4	An inspection of the waste loading process has been completed.	N/A	No disposal operation occurred during reporting period.
4.5	An audit of the operation's compliance with environmental, health and safety and emergency response operational procedures has been undertaken.	N/A	No disposal operation occurred during reporting period.
4.5	Certificates of acceptance have been sent to waste disposers.	N/A	No disposal operation occurred during reporting period.
4.7	A performance and compliance report has been submitted to the EPA.	N/A	No disposal operation occurred during reporting period.
4.7	A copy of the approved Performance and Compliance report has been forwarded to the CLC and waste disposers.	In compliance	The EPA endorsed 2019-2020 PCR including 2020NRT01 close-out report was received by waste owner on 26 May 2021.
4.7	Certificates of disposal have been sent to each waste owner.	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
4.7	A copy of the Performance and Compliance report has been retained for archiving.	In compliance	As required by the Department of Finance Retention & Disposal Schedule (approved March 2014) a copy of the EPA endorsed 2019 – 2020 PCR has been retained for archiving.
4.8.1	The IWDF access road has been inspected every six months	In compliance	Access road inspection occurred Oct 2020, and Apr 2021. See Appendix U for road inspection records.
4.8.2	Reports on the condition of the access road have been completed and forwarded to Finance	In compliance	Access road inspection occurred Oct 2020, and Apr 2021 and forwarded to Finance with relevant monthly reporting. See Appendix U.
4.8.3	Ongoing groundwater and radiation monitoring have been undertaken	In compliance	Groundwater monitoring was completed in Oct 2020, and Apr 2021. See Appendix V for monitoring records. Radiation monitoring was not required during reporting period.
4.8.4	Community Liaison Committee meetings have been held at least four times per year	In compliance	CLC Meetings were held 24 Oct 2020, 8 Dec 2020, 1 Apr 2021, and 10 Jun 2021. See Appendix M for minutes. June 2021 minutes have not been included in Appendix M as they have not yet been finalised. The draft Jun 2021 minutes have been sighted by the auditor.
4.8.5	A representative of Finance has attended all CLC meetings and acted as chairperson	In compliance	A Finance representative attended all CLC meetings and acted as chairperson. See Appendix M for CLC meeting minutes. June 2021 minutes have not been included in Appendix M as they have not yet been finalised. The draft Jun 2021 minutes have been sighted by the auditor.

Section	Requirement	Status	Evidence / Comment
Procedure: MP-09 Training			
4.2	All new personnel have attended induction training	In compliance	Two general IWDF site inductions were completed during the reporting period for personnel visiting the IWDF in Oct 2020. An abridged general site induction was completed for the various personnel visiting the IWDF 28 Jul 2020 as all personnel were always accompanied by FMC and Finance personnel while on site.
4.3	A competency plan has been developed for each position	N/A	No competency plans have been developed as there are no new personnel.
4.3	A training schedule has been developed based on the competency plans.	N/A	See above.
4.4	Annual training reviews have been completed for each staff member.	N/A	See above.
4.4	Where a job scope has been significantly altered, the employee has failed to meet requirements, a major accident has occurred or substantial changes to the management system have been undertaken, training needs have been re-evaluated.	N/A	Not required as no relevant events occurred during the reporting period.
4.5	Qualifications of the contractors have been confirmed as part of the tender process.	N/A	No tender process occurred during reporting period.
4.5	The FMC has been provided with management system training as part of the implementation of the management system and following major changes or revisions.	N/A	Not required as there have been no FMC personnel changes during reporting period.

Section	Requirement	Status	Evidence / Comment										
4.6	All training has been recorded on a Training Record sheet and kept on file.	N/A											
Procedure: MP-10 Procurement													
5.1.2	<p>Monetary Thresholds and Delegation Limits</p> <p>The following table sets out the monetary threshold for the procurement.</p> <table border="1" data-bbox="369 619 1155 922"> <thead> <tr> <th>Monetary Threshold</th> <th>Minimum Requirements</th> </tr> </thead> <tbody> <tr> <td>Up to \$5,000</td> <td>Direct purchase or “do and charge”</td> </tr> <tr> <td>\$5,001 – \$20,000*</td> <td>Request sufficient verbal quotations</td> </tr> <tr> <td>\$20,001 – \$250,000*</td> <td>Request sufficient written quotations</td> </tr> <tr> <td>Above \$250,000</td> <td>Open tender through a public advertisement</td> </tr> </tbody> </table> <p>*Or direct purchase up to \$50,000 by Finance staff if in accordance with the Finance Direct Purchasing Framework.</p> <p>The thresholds are based on total estimated price and are GST inclusive.</p> <p>Obtaining “sufficient quotations” means obtaining an adequate number of offers from bona fide sources of supply to ensure open and effective competition.</p> <p>To demonstrate competition, the number of suppliers requested should range from two to five. In determining how many quotations are enough, consideration needs to be given to how many potential suppliers there are in the market.</p>	Monetary Threshold	Minimum Requirements	Up to \$5,000	Direct purchase or “do and charge”	\$5,001 – \$20,000*	Request sufficient verbal quotations	\$20,001 – \$250,000*	Request sufficient written quotations	Above \$250,000	Open tender through a public advertisement	In compliance	Procurement related to the IWDF by the FMC occurred once during the reporting period. A review of the purchasing process undertaken for replacement signage project completed October 2020 confirmed that the cost was less than \$20,000.00 for the signs and associated equipment and sufficient (>2) verbal quotes were requested.
Monetary Threshold	Minimum Requirements												
Up to \$5,000	Direct purchase or “do and charge”												
\$5,001 – \$20,000*	Request sufficient verbal quotations												
\$20,001 – \$250,000*	Request sufficient written quotations												
Above \$250,000	Open tender through a public advertisement												

Section	Requirement	Status	Evidence / Comment
5.1.3	<p>Approval Purchases are to be approved by Finance and the request for approval provided must include the following information as a minimum:</p> <ul style="list-style-type: none"> • a description of the purchase/specification; • who the quotes were obtained from including price; • any relevant information including warranty details, service, and support etc.; and • the recommendation and how it achieves a value for money outcome as detailed in section 7. 	In compliance	Review of the FMC procurement folder demonstrated that the written quotations received were assessed and a recommendation was made, via email, to the Finance IWDF Disposal Operation Project Manager (Contract Manager) 16 Oct 2020, with a request for approval. Approval, via email, was received from Finance IWDF Project Director on 16 Oct 2020.
5.1.4	<p>Quotation and Tender Documentation Purchase above \$50,000 will require documentation to clearly detail the following:</p> <ul style="list-style-type: none"> • selection criteria; • scope of work required; • closing date and time; • definitive specification or work statement clearly identifying the contract's requirements; • contract term; and • contract conditions. 	N/A	No purchases above \$50,000.00 occurred during reporting period.
5.1.5	<p>Selection of Preferred Respondent For purchases above \$50,000 a selection panel shall be formed which will include the Finance IWDF Project Manager. Each member of the panel will be required to independently review the responses and score against the specified selection criteria.</p>	N/A	No purchases above \$50,000.00 occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>The panel shall then convene and make a joint decision regarding the preferred respondent based on these scores. A selection report is to be prepared detailing the outcome of the process and is to be signed by the Finance Approving Officer (refer section 5.1.3 for requirements). A copy of the selection report and score sheet shall be kept on file.</p> <p>Responses received after the closing date, or which do not address any specified compliance criteria will not be assessed.</p>		
5.1.6	<p>Awarding Contracts Following approval of the contract a letter of engagement will be sent to the preferred respondent detailing that they are the preferred respondent.</p>	N/A	
5.1.7	<p>Managing Contracts Once a contract is in place, various measures shall be implemented to ensure that the good or service is being provided in accordance with the conditions of the contract. This will include:</p> <ul style="list-style-type: none"> • spreadsheet of expenditure for each contract; • a file for contract invoices; • confirmation of the quality and receipt of goods or services; • supplier invoices checked thoroughly against the conditions of the contract before being approved for payment. 	N/A	
Procedure: MP-11 Management Audits			
4.1	Annual audits have been undertaken	In compliance	This audit table is evidence of internal audit for the reporting period.

Section	Requirement	Status	Evidence / Comment
4.1	An Internal Management Audit Schedule has been prepared in June of each year	In compliance	Audit schedule was prepared by FMC System Manager in Jun 2020. See Appendix W.
4.2	Audits have been conducted by an audit team which contains a qualified auditor	In compliance	Audit team included a qualified auditor.
4.3.3	An audit protocol has been prepared prior to the audit	In compliance	Audit protocol was prepared.
4.3.3	Staff have been notified at least 2 weeks prior to the audit	In compliance	All staff were notified - up to one month prior to audits taking place - at the monthly management meetings.
4.3.3	An audit report register has been completed	In compliance	A completed Audit Register was sighted by the auditor.
4.3.3	Any non-conformances determined have been recorded in a Corrective Action Request (CAR)	In compliance	No noncompliances were recorded.
4.4	Audit findings have been documented in an audit report and logged on the audit report register	In compliance	Audit findings have been documented in an audit report (this report) and summarised in the audit register.
4.4	The audit report has been forwarded to the Finance Project Manager and distributed to personnel.	In compliance	Audit reports included in the draft PCR was provided to Finance IWDF Project Director for review.
4.5	A Performance and Compliance report was prepared and forwarded to the EPA within three months of the conclusion of a disposal operation.	N/A	No disposal operation occurred during reporting period. This PCR will be forwarded to RCWA to fulfil Registration compliance reporting.

Section	Requirement	Status	Evidence / Comment
4.5	Internal performance and compliance audits were undertaken in accordance with the audit schedule each year.	In compliance	Tables 6, 7 and 8 of this PCR detail the results of the internal performance and compliance audits for the reporting period.
Procedure: MP-12 Management Review			
4.1	Management Review Meetings (MRM) have been held twice yearly	In compliance	MRM was held 24 Nov 2020 and 03 Jun 2021. See Appendix R for meeting minutes.
4.1	The required personnel, as specified in 4.1, have attended the meetings	In compliance	The MRM meeting was attended by the Finance Project Director, Finance Contract Manager (Project Manager), FMC Project Director, FMC Project Manager and the RSO. See Appendix R for MRM minutes detailing attendance.
4.2	The agenda and relevant background information has been provided to all personnel prior to the Management Review Meeting	In compliance	Agendas were provided, via email, to the management team via email on 22 Nov 2020 and 26 May 2021. See Appendix X for meeting agendas.
4.3	Management review meetings have addressed the suitability of Finances policies, achievement of objectives and targets, EHSM program and corrective and preventative actions.	In compliance	Management Review Meetings addressed the suitability of Finances policies, achievement of objectives and targets, EHSM program and corrective and preventative actions. See Appendix R.
4.3	Management Review Meeting agendas address the topics: <ul style="list-style-type: none"> • suitability of the Policy; • achievement of Objectives and Targets; • compliance with the Environmental Management Program; • effectiveness of the EMS in terms of: <ul style="list-style-type: none"> ▪ environmental performance; ▪ implementation and suitability; 	In compliance	See Appendix X for MRM meeting agendas.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> ▪ adequacy; ▪ continual improvement. • corrective and preventative actions. <p>The review shall include, but not be limited to the following agenda items:</p> <ul style="list-style-type: none"> • policies, objectives, targets, and management plans; • changes in external drivers and situations; • management manual updates, including polices, objectives and targets; • audit results; • management procedures updates/improvements; • internal and external management audits results; • non-conformance and Corrective and Preventive Actions; • future goals and improvements to the management system; • changes to aspects and impacts; • performance against management plans; and • staff training needs and training effectiveness. 		
4.3	The responsibility for the implementation of changes or actions has been assigned during Management Review Meetings and is recorded in the minutes.	In compliance	See Appendix R.
4.3	Follow up on the achievement of these improvements and actions has been completed.	In compliance	Actions from the previous MRM meeting are addressed in Section 3 of Management Review Meetings. See Appendix R.
4.3	Minutes of Management Review Meetings have been recorded and distributed.	In compliance	See Appendix R.

Section	Requirement	Status	Evidence / Comment
Procedure: MP-13 Control of Non conformances and Corrective and Preventative Action			
4.2	Following the identification of a non-conformance a CAR has been completed and forwarded to the IWDF Project Manager	N/A	No noncompliances were recorded during the reporting period.
4.3	Corrective actions and a program for their implementation have been developed for each CAR and reviewed regularly until the action is implemented.	N/A	
4.3	Information regarding each CAR has been entered onto the CAR register.	N/A	CAR register was reviewed, and all outstanding CARs are now closed.
4.3	The progress of each CAR has been presented at a Management Review Meeting	In compliance	CAR register reviewed and all CARs are now closed.
4.4	The discovery of inefficiencies and potential non conformances by staff have been recorded on suggestion sheets and forwarded to the IWDF Project Manager	N/A	No suggestion sheets were forwarded to the IWDF Project Manager.
4.4	Suggestion sheets have been reviewed and valid changes implemented	N/A	See above.
4.4	Where a suggestion has not been accepted a written response has been provided to the author detailing why	N/A	See above.
4.4	All suggestions and their outcomes have been documented at a Management Review Meeting	N/A	No formal suggestions have been received during reporting period.
4.5	All CARs and suggestion forms have been retained on the appropriate file	N/A	No CARs were recorded for the reporting period.

4.2.2 FMC IWDF Management System Compliance Audit

Table 7 presents the results of the July 2020 to June 2021 internal audit of the FMC implementation of the requirements of the FMC EHSQMS.

As no disposal operation occurred during the reporting period, procedures related to specific disposal activities such as trench excavation, preparation of waste for transport, transport of waste, waste delivery, trench capping, and disposal close-out were not audited.

FMC compliance with the FMC EHSQMS was good with no noncompliances recorded.

Table 7
FMC Environmental Health and Safety and Quality Management System 2020 – 2021 Internal Compliance Audit of Procedures

FMC Operational Procedures

Section	Requirement	Status	Evidence / Comment
OP-01 Assessment of Application for Disposal			
Purpose: Addresses the management of environmental and safety impacts associated with the initial application of waste owners to dispose of wastes at the IWDF and assessment of these applications.			
5.1	<p>Preliminary discussion of inquiries Finance shall notify the FMC Project Manager and Operations Manager of initial inquiries by waste owners. The following shall be discussed with the waste owner by the FMC:</p> <ul style="list-style-type: none"> • Nature of waste (chemical composition and physical form); • Packaging of the waste; • Approximate quantities of waste; • Approximate schedule for disposal; • Requirements for application to dispose (information to be provided to the waste owner, such as Acceptance Criteria); and • Indicative costs. 	In compliance	Review of the FMC Waste Enquiries folder demonstrated that where Finance notified the FMC of an initial enquiry a preliminary phone conversation is held with the waste owner to provide an overview of disposal at the IWDF. The waste owner is then sent the relevant Waste Acceptance Guidelines, a location map and a flow chart describing the disposal process. Due to waste owner 'commercial-in-confidence' evidence cannot be provided.
5.2	<p>Provision of waste acceptance guidelines and proforma The FMC Project Manager shall ensure that the Guidelines for disposal at the IWDF are provided to waste owners enquiring about disposal. The FMC Project Manager or Systems Manager must provide the most up-to-date version of the Guidelines to waste owners.</p>	In compliance	All waste owner enquiries forwarded to the FMC by Finance were provided with waste acceptance guidelines. Prior to sending, the guidelines were checked to ensure the guidelines were up to date.

Section	Requirement	Status	Evidence / Comment
5.3	<p>Assessment of applications to dispose Finance, the FMC Project and Operations Manager (and the RSO, if radioactive waste) shall assess all applications to dispose of waste at the IWDF.</p> <p>Applications shall be received in the form of a completed <i>Waste Acceptance Proforma and Packaging & Transport Proforma</i> as provided in the Guideline documents.</p> <p>Assessment shall include the following:</p> <ul style="list-style-type: none"> • Comparison of details provided by the waste owner on the nature, packaging, and quantity of the waste, as well as alternatives to disposal, with Waste Acceptance Criteria. • Inspection of the waste (where considered to be necessary, in accordance with Operational Instruction OI-01 <i>Waste Inspection</i>). 	In compliance	Review of assessments of waste applications, both chemical and radioactive, received during the reporting period confirmed that all required elements were assessed. Waste inspections were also completed where considered necessary.
5.4	<p>Provision of project cost information On request from Finance the FMC Project Manager and the Operations Manager shall provide cost information to Finance. Cost information shall include:</p> <ul style="list-style-type: none"> • trench excavation costs (based on likely waste quantity or a range of quantity scenarios); • FMC management and supervision costs (based on waste quantity and field schedule); and • other costs as requested by Finance. 	In compliance	Where applicable, after discussion with Finance, preliminary waste disposal costs have been provided to waste owners by the FMC. Due to commercial in confidence evidence was sighted but has not been included.
6	<p>Reporting The results of assessment activities shall be documented by the FMC Project Manager (or delegate) and placed on file (as per FMC Management Procedure FMP-02 <i>Record Management</i>.)</p> <p>Assessment results shall be provided to Finance upon request and may be incorporated</p>	In compliance	<p>Inspection confirmed that appropriate assessment records are documented and saved into the FMC Waste Enquiries folder.</p> <p>Review of the Waste Enquiries folder demonstrated that all assessments</p>

Section	Requirement	Status	Evidence / Comment
	into the <i>Operation Environmental and Waste Acceptance Procedures</i> .		undertaken during the reporting period were provided to Finance attached to formal recommendation/advice.
OP-02 Operational Administration, Planning and Approvals			
Purpose: Addresses the management of environmental and safety impacts associated with the planning phase.			
5.1	<p>Set-up project administration and management Upon request by Finance, the FMC Project Manager shall set-up FMC operation administration in accordance with Finance requirements for invoicing and reporting (such as specific cost codes to be used).</p> <p>The FMC Project Manager shall inform the members of the project team of the commencement of activities.</p> <p>The FMC Project Manager shall commence planning activities, in accordance with Finance requirements.</p> <p>The FMC Project Manager shall liaise with the Operations Manager and other managers to address project team actions.</p>	N/A	No waste disposal operation occurred during reporting period.
5.2	<p>Operation planning meetings The FMC Project Manager (and other project staff as appropriate) shall attend regular (e.g., weekly) project planning meetings, as coordinated by Finance. Finance shall chair the meetings and produce minutes of the meetings.</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.3	<p>Waste Owner-Finance-FMC meetings The FMC Project Manager (and other project staff as appropriate) shall attend regular (e.g., monthly) project planning meetings with waste owner(s), as coordinated by Finance.</p>	N/A	No waste disposal operation occurred during reporting period.
5.4	<p>Review of Relevant Legislation, Aspects and Reference Documents The FMC Project Manager and the Systems Manager shall ensure that all project planning documents refer to the most up-to-date versions of reference documents, the legal register and the aspects and impacts register.</p>	In compliance	The Legal Register and the Aspects and Impacts Register were reviewed and updated, if required, in Sept 2020 and May 2021. See Appendices P and Q.
5.5	<p>Documentation – Operation Environmental and Waste Acceptance Procedures A document summarising the Operation Environmental and Waste Acceptance Procedures (OEWP) for proposed disposal operation shall be formulated by the FMC Systems Manager, with input where required from the FMC Project Manager, Environment Manager, Operations Manager, Engineering Manager and RSO.</p>	N/A	No waste disposal operation occurred during reporting period.
5.6	<p>Documentation – Operation Transport Procedures A document summarising the Operation Transport Procedures (OTP) for the proposed disposal operation shall be compiled by the FMC Systems Manager with input from the FMC Project Manager and Operations Manager.</p> <p>The scope of the OTP shall be in accordance with the Packaging and Transport (Reporting) Guidelines.</p> <p>Waste-specific sections of the OTP shall be provided by waste owners, comprising completed proformas and attachments from the Packaging and Transport (Reporting) Guidelines.</p> <p>In cases where the State has taken responsibility for transport, the FMC will provide waste-</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	specific details.		
5.7	<p>Documentation – Operation Health & Safety and Emergency Response Procedures A document summarising the Operation Health & Safety and Emergency Response Procedures (OHS&ERP) for the proposed disposal operation shall be compiled in accordance with Safety Procedure SP-01 Health & Safety Management and Planning.</p>	N/A	No waste disposal operation occurred during reporting period.
5.8	<p>Documentation – Operation Construction Specifications A document summarising the Construction Specifications (CS) for the proposed disposal operation shall be compiled by the Engineering Manager.</p> <p>The scope of the CS shall be to provide operation-specific instructions (specifications and drawings) to the Earthworks Contractor for clearing, excavation, waste covering, capping and rehabilitation of the trench and be developed in accordance with Capping Construction Method Statement (Appendix).</p> <p>Information for input into the CS shall include:</p> <ul style="list-style-type: none"> • trench design and dimensions determined using proposed waste quantities, from the Operations Manager/Engineering Manager; and • geotechnical test results from previous operations and other testing work. 	N/A	No waste disposal operation occurred during reporting period.
5.9	<p>Document Review and Approval Draft operation documents shall be reviewed in accordance with FMC Management Procedure FMP-02 Record Management.</p> <p>Following review by Finance, and any appropriate revision, operation documents shall be re-submitted to Finance who will submit them to the EPA and/or Radiological Council for</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>approval.</p> <p>Following review by the EPA, any appropriate revisions must be undertaken by the appropriate FMC Managers in consultation with Finance.</p>		
5.10	<p>Trench Design and Location</p> <p>The design and location of the disposal cell shall be reviewed with consideration to the following:</p> <ul style="list-style-type: none"> • current best practice (national and international developments in landfill and waste management (see OP-09); • trench design reports (e.g., Final Cover Report); • applicability of trench, shaft, tunnel, or another cell design; • quantity and type of waste; • aerial photograph and site topographical data; and • geological data (silcrete and clay thickness data and depth to bedrock from drilling programmes). <p>The favoured trench design and location shall be presented to Finance and RCWA (if radioactive material is to be disposed) for approval and included in the OEWP and CS.</p>	N/A	No waste disposal operation occurred during reporting period.
5.11	<p>Inspection of waste and packaging</p> <p>An inspector delegated by Finance (likely to be the Operations Manager or FMC Project Manager) will inspect the wastes proposed for disposal at the IWDF, to ensure that the waste and its packaging are in accordance with the Acceptance Criteria.</p> <p>The inspection shall be undertaken in accordance with the Operational Instruction OI-01 Waste Inspection.</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.12	<p>Completion of planning activities – General Management</p> <p>The following general management activities shall be completed prior to commencement of field activities:</p> <ul style="list-style-type: none"> • compilation of a provisional Field Schedule (timetable) which shall be updated, as appropriate, as the field operation progresses. • distribution of field schedule to all parties involved (FMC Managers, RSO and Finance). 	N/A	No waste disposal operation occurred during reporting period.
5.13	<p>Completion of planning activities – health and safety</p> <p>Health and safety planning activities shall be completed in accordance with Safety Procedure SP-01 Health & Safety Management and Planning.</p>	N/A	No waste disposal operation occurred during reporting period.
5.14	<p>Completion of planning activities – environmental</p> <p>The following environmental planning activities shall be completed prior to commencement of transport and disposal of the waste:</p> <ul style="list-style-type: none"> • liaison with laboratory regarding chemical analysis of soil, dust and water samples; • development of sampling program; • liaison with RSO (if radioactive waste is being disposed); • reference to Department of Biodiversity, Conservation & Attractions database Florabase (see EP-01 Vegetation (Flora) Management), with assistance of Botanist. 	N/A	No waste disposal operation occurred during reporting period.
5.15	<p>Completion of planning activities – geotechnical</p> <p>The following geotechnical planning activities shall be completed prior to commencement of relevant field activities:</p> <ul style="list-style-type: none"> • liaison with laboratory regarding geotechnical testing; and • development of geotechnical sampling and testing program. 	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.16	Completion of planning activities – radiation See Environmental Procedure RP-01 Radiation Management.	N/A	No waste disposal operation occurred during reporting period.
5.17	Completion of planning activities – operational The following operational planning activities shall be completed prior to commencement of field activities: <ul style="list-style-type: none"> • liaison with the Earthworks Contractor (schedule, personnel, equipment, etc); and • hire of site facilities and equipment if required (dongas, kitchen, offices, decontamination unit, radios, etc). 	N/A	No waste disposal operation occurred during reporting period.
OP-03 Excavation of Disposal Trench			
Purpose: Addresses the management of environmental and safety impacts associated with the excavation of a disposal trench.			
Not required as no disposal operation occurred during reporting period.			
OP-04 Waste Preparation for Disposal			
Purpose: Addresses the management of environmental and safety impacts associated with the preparation of waste for transport to, and disposal at the IWDF.			
Not required as no disposal operation occurred during reporting period.			
OP-05 Waste Loading and Transport			
Purpose: Addresses the management of environmental and safety impacts associated with the loading and transport of waste to the IWDF.			
Not required as no disposal operation occurred during reporting period.			

Section	Requirement	Status	Evidence / Comment
OP-06 Waste Delivery, Acceptance and Disposal			
Purpose: Addresses the management of environmental and safety impacts associated with the acceptance, delivery, and placement of waste to the IWDF.			
Not required as no disposal operation occurred during reporting period.			
OP-07 Capping, Rehabilitation and Demobilisation			
Purpose: Addresses the management of environmental and safety impacts associated with the capping of the disposal trench at the IWDF and subsequent demobilisation from site.			
Not required as no disposal operation occurred during reporting period.			
OP-08 Operation Close-out			
Purpose: Addresses the management of environmental and safety impacts associated with the close-out of the disposal operation at the IWDF in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF.			
Not required as no disposal operation occurred during reporting period.			
OP-09 Ongoing and General Management			
Purpose: Addresses the management of environmental and safety impacts associated with the ongoing management of the IWDF, which occurs irrespective of specific waste disposal operations being undertaken at the site.			
5.1	Project Administration The FMC Project Manager shall manage the finances of the project and invoice Finance	In compliance	IWDF FMC Ongoing Management Task Plan and cost projection, against agreed

Section	Requirement	Status	Evidence / Comment
	<p>in accordance with the cost codes as agreed with Finance.</p> <p>The FMC PM shall inform relevant subcontractors of the cost codes supplied by Finance.</p>		cost codes, for July 2020 – June 2021 was provided to Finance in July 2020.
5.2	<p>Tendering</p> <p>Upon request by Finance, the FMC Operations Manager, the Engineering Manager, or the Project Manager shall assist Finance in the engagement of a Contractor to undertake activities at the site.</p>	N/A	No tenders were required during the reporting period.
5.3	<p>Infrastructure Development</p> <p>Upon request by Finance, the FMC Project and Operations Manager shall help Finance in the development of infrastructure at the site. Reference should be made to existing infrastructure plans, where applicable.</p>	In compliance	The FMC assisted Finance in pricing and potential procurement of replacement infrastructure, such as replacement generator and diesel storage tank during the reporting period.
5.4	<p>Update of Legislation</p> <p>Upon request by Finance, the FMC Project Manager shall ensure that necessary legislation updates are incorporated into subsequent IWDF documentation, in accordance with Finance MP-02 <i>Applicable Laws, Regulations and Other Requirements</i>.</p>	In compliance	Legal Register was reviewed and updated in Sep 2020 and May 2021. See Appendix Q.
5.5	<p>Review of Good Practice</p> <p>Upon request by Finance, the FMC Project Manager shall coordinate assistance to Finance for a good practice review, and/or shall ensure that necessary changes are incorporated into project planning and documentation.</p> <p>Review of good practice may include review of national and international developments in the following: landfill capping, hazardous waste management, radioactive waste</p>	In compliance	Review of good practice was undertaken in Nov 2020 & May 2021. A review of the IWDF Document Library provided evidence of relevant new or updated national and international documents included. A review of monthly meeting minutes provided evidence that new documents or information

Section	Requirement	Status	Evidence / Comment
	management, alternative treatment technologies and landfill management.		is discussed at the monthly meeting with actions, if required, documented.
5.6	<p>Site Visits During periods when disposal operations are not being undertaken, regular site visits shall be undertaken to the IWDF by FMC personnel, at the direction of Finance.</p> <p>Site visits shall coincide with monitoring and maintenance requirements (see below), as a minimum. Site visits shall be recorded using a <i>Site Visit Checklist</i>, (IWDF Form 52).</p>	In compliance	See Appendix Y for site visit checklists recorded on IWDF Form 52.
5.7	<p>On-going Monitoring Monitoring shall be undertaken as directed by Finance, in accordance with the <i>monitoring schedule</i>.</p> <p>Monitoring may comprise:</p> <ul style="list-style-type: none"> • groundwater monitoring (Environmental Procedure <i>EP-03 Environmental Monitoring and Instruction EI-01</i>), • radiological monitoring (Radiation Procedure <i>RP-01 Radiation Management and Instruction RI-01 Radiation Monitoring</i>), • trench capping monitoring (Environmental Instruction <i>EI-03 Capping Monitoring</i>), rehabilitation monitoring (Environmental Procedure <i>EP-05 Rehabilitation Management and Instruction EI-04</i>). 	In compliance	<p>Ongoing monitoring has been completed and records reviewed.</p> <p>See Appendix N for rehabilitation monitoring records, Appendix V for groundwater monitoring results, Appendix Z for capping monitoring records.</p>
5.8	<p>Site Investigations The FMC Project and Operations Manager shall ensure that sufficient data is available, to</p>	In compliance	Review of available data and interview with Operations manager confirmed that data was considered adequate for the management of the IWDF during the

Section	Requirement	Status	Evidence / Comment
	<p>provide support for the management of the IWDF site.</p> <p>Such data may include:</p> <ul style="list-style-type: none"> • geological drilling data (geological unit thicknesses and depth to bedrock). • surface topographical data (aerial photography and contour data). • weather data. • groundwater monitoring data (from groundwater monitoring bores). • radiation monitoring data. <p>If an area is identified where it is deemed that insufficient data is available to provide support for the management of the site (e.g., too few monitoring bores to adequately monitor potential groundwater impacts due to expansion of the disposal area) the IWDF Project Manager shall make recommendations to Finance for the implementation of further investigations at the IWDF.</p>		<p>reporting period. All available data is controlled in the IWDF Document Library.</p>
5.9	<p>Infrastructure and Equipment Maintenance</p> <p>The Operations Manager shall ensure that equipment and facilities (listed on IWDF-Forms-41 and 42) at the IWDF undergo regular maintenance in accordance with FMC Management Procedure <i>FMP-06 – Control and Maintenance of Equipment</i>. Equipment maintenance shall be recorded using IWDF-Forms 40, 41 and 42.</p> <p>The Operations Manager shall ensure that sufficient water, fuel, and food supplies are maintained at the site.</p> <p>The Operations Manager shall maintain a <i>Dangerous Goods Storage inventory</i> for fuels</p>	In compliance	<p>As no disposal operation occurred during reporting period equipment and facilities maintenance was recorded on the site visit checklist. See Appendix Y for Site Visit Checklists and see Appendix AA for <i>Dangerous Goods Storage Inventory</i> for Oct 2020 and May 2021 (IWDF-Form 51).</p>

Section	Requirement	Status	Evidence / Comment
	and other hazardous materials stored at the site (IWDF-Form 51).		
5.10	<p>Access Road Maintenance The Operations Manager, the Engineering Manager and the FMC Project Manager shall assist Finance to determine when access road maintenance activities are required.</p> <p>The access road shall be inspected regularly (e.g., every 6 months during monitoring visits). Road inspection shall be recorded using the Access Road Condition Report Form (IWDF-Form-44)</p>	In compliance	See Appendix U for Access Road Condition Reports.
6	<p>Records and Reporting The results of on-going activities shall be documented by the FMC Project and Operations Managers (or others, as appropriate) and placed on file (as per FMC Management Procedure FMP-02 Record Management).</p> <p>The FMC Project Manager shall ensure that results of all environmental and other monitoring are forwarded to Finance upon request (generally annually), for input to PCR reporting by Finance.</p> <p>Letters or records shall be submitted to Finance detailing recommendations for additional investigations or site activities, because of reviews or site inspections.</p>	In compliance	Monitoring records are provided to Finance with the monthly report post the site visit – all records are kept in the IWDF document library which is uploaded periodically to Finance server. Site visit and monitoring records are also included in the annual PCR. See Section 5 of this PCR.
OP-10 Operation Site Management			
Purpose: Must be followed for general management at the IWDF site during disposal operations,			
Not required as no disposal operation occurred during reporting period.			

Section	Requirement	Status	Evidence / Comment
OI-01 Waste Inspection			
Purpose – Must be followed during inspections of waste proposed for disposal at the IWDF.			
5.1	<p>Phases of Inspection Inspection of waste proposed for disposal at the IWDF will generally be required at the following stages of a waste disposal operation:</p> <ul style="list-style-type: none"> • preliminary assessment (during initial assessment of waste proposed for disposal at IWDF – see OP-01 – Assessment of Applications) • treatment/packaging of waste (during preparation of waste for disposal at IWDF – see OP-04 – Waste Preparation) • post-packaging (post preparation of waste for disposal, but prior to transport– see OP-04 – Waste Preparation) • loading for transport (immediately prior to transport– see OP-05 – Waste Transport) • delivery of waste (upon arrival at the IWDF, but prior to disposal – see OP-06 – Waste Delivery) • other times (as needed or requested by FMC). 	In compliance	<p>Only waste inspection assessments occurred during the reporting period. To date none have progressed to the next stage.</p> <p>Review confirmed all preliminary assessments have been documented and saved in the appropriate waste owner file/ folder on the FMC server.</p>
5.2	<p>Inspection Personnel The FMC IWDF Project Manager shall be informed of the FMC personnel available to</p>	In compliance	<p>Review of all waste inspections records confirmed that all inspections were completed by either the RSO or FMC Operations Manager.</p>

Section	Requirement	Status	Evidence / Comment
	<p>undertake waste inspections.</p> <p>In general, inspectors will be:</p> <ul style="list-style-type: none"> • FMC Operations Manager • FMC Project Manager • FMC Environment Manager, or • Radiation Safety Officer. 		
5.2	<p>Inspection Criteria</p> <p>The inspector shall inspect the waste in accordance with several acceptance criteria, as outlined in the IWDF Waste Acceptance and Packaging and Transport Guidelines (see References).</p> <p>The inspector shall be familiar with these criteria.</p> <p>The inspector shall follow and complete a Waste Inspection Record (IWDF-Form-53).</p>	In compliance	Review confirmed that for waste inspected, where necessary, IWDF-Form-53 was completed and placed on the appropriate waste owner folder/file.
5.4	<p>Photographic Records</p> <p>Photographs of the waste shall be taken to ensure that the visual characteristics of the waste are recorded.</p>	In compliance	Review confirmed that for all waste inspected the IWDF-Form-53 was completed, with photographs included, and placed on the appropriate waste owner folder/file on the FMC server.
6.	<p>RECORDS</p> <p>The Inspector shall ensure that all inspection records are forwarded to the FMC Project</p>	In compliance	Review confirmed that all waste inspection records are forwarded to the FMC Project Manager and saved in the appropriate waste owner file/folder on the FMC server.

Section	Requirement	Status	Evidence / Comment
	<p>Manager and Finance.</p> <p>If the inspection occurs at the IWDF site, records shall be filed in the Waste Delivery File at the IWDF site office. The Systems Manager shall ensure that records are filed in accordance with FMC Management Procedure FMP-02 Record Management.</p>		<p>Inspection records are included in the waste assessment report which is forwarded to Finance with recommendation/advice regarding the waste.</p>
7.	<p>REPORTING</p> <p>The Inspector shall report all waste inspection issues to the FMC Operations Manager. The Operations Manager shall ensure that waste issues are forwarded to the FMC Project Manager who will then discuss with Finance Project Manager.</p> <p>Waste Inspection Records and Finance Waste Assessment Records shall be included in Operation Environmental and Waste Acceptance Procedures (OEWPs) and the Performance and Compliance Report, where appropriate.</p>	In compliance	<p>All waste inspection issues, and assessments have been forwarded to Finance for actioning.</p> <p>No disposal agreements were entered into during reporting period so not appropriate to include waste inspection records in this PCR.</p>

FMC Management Procedures

Section	Requirement	Status	Evidence / Comment
FMP- 01 Document and Data Control			
<p>Purpose - This procedure addresses document and data control at the IWDF and at the Facility Management Contractor (FMC) office(s), in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF and Finance Management Procedure MP-06 Document & Data Control, to enable the following requirements to be met:</p>			

Section	Requirement	Status	Evidence / Comment
5.1	<p>Finance Document Control Requirements Finance document control requirements are outlined in Finance-MP-06 – Document and Data Control. The FMC Systems Manager shall ensure that all Finance controlled documents, as defined in the Finance Document Control Matrix (see MP-06) are controlled in accordance with the matrix.</p>	In compliance	<p>Controlled documents are stored on the Finance Records Management System, FMC server in the IWDF Document Library or appropriate IWDF project folder.</p> <p>See Appendix T for Document Control Matrix.</p>
5.2	<p>FMC Controlled Documents Documents defined as Controlled Documents are given in the FMC IWDF Document Control Matrix. Controlled documents shall be prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the FMC IWDF Document Control Matrix.</p> <p>The person responsible for the control (storage and distribution) of documents is referred to as the Document Controller, as defined in the matrix.</p>	In compliance	<p>Review confirmed that controlled documents are prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the FMC IWDF Document Control Matrix.</p> <p>Where documents are prepared by the FMC, emails from Finance approving the document were sighted by the auditor.</p>
5.3	<p>Document Registration FMC-controlled project documents shall be registered by the preparer with the Systems Manager, who shall use an FMC IWDF Document Register (IWDF-Form-16) to reflect the status of all controlled documents. Document numbers/identifiers shall be obtained from Finance for all Finance controlled documents.</p> <p>An FMC identifier shall be used for FMC controlled documents (e.g., FMC procedures). Separate registers may be produced for each disposal operation and for ongoing general management.</p> <p>Separate registers <u>may</u> also be produced for different types of documents, such as:</p>	In compliance	<p>Review confirmed all FMC prepared documents have been allocated a unique document number such as DF12020-001-0PCR_LM_Revision 1 and where necessary a document number is obtained from Finance. This is demonstrated in Appendix M CLC Minutes.</p>

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • FMC Procedures • FMC QA Forms • Manuals • Radiation Reports. 		
5.4	<p>Distribution of Controlled Documents Documents produced by the FMC on behalf of Finance shall be distributed as outlined in the IWDF Document Control Matrix. A record of the distribution of all FMC controlled documents shall be made by saving the distribution email in the appropriate folder.</p>	In compliance	
5.5	<p>Document Revision Changes to internally generated controlled documents shall be prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the FMC IWDF Document Control Matrix.</p> <p>Controlled documents shall use numerical revision codes. For all documents issued as drafts, the revision should include a point e.g., 1.1 and then should use the next whole number for approved documents. Electronic documents shall, as a minimum, be dated, with reference to the fact that any printed copy is uncontrolled.</p> <p>A request for a change to a document shall be made in writing to the Systems Manager/Document Controller (e.g., using a Corrective Action Request, CAR IWDF-Form-10).</p>	In compliance	A review of the controlled documents prepared during the reporting period verified that all documents were prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the FMC IWDF Document Control Matrix.
5.6	<p>Document Review and Approval All controlled documents produced by the FMC shall be reviewed by the FMC Project Manager and other appropriate technical managers, prior to release to Finance for approval, as shown in the FMC IWDF Document Control Matrix.</p>	In compliance	Random review of documents and associated folders verified that documents have been reviewed by the FMC IWDF

Section	Requirement	Status	Evidence / Comment
	Electronic documents shall be updated to show the date and initials of the approver/reviewer. All emails containing reviewed documents should be saved in the appropriate electronic folder.		Project or Project Director before they are provided to Finance.
5.7	<p>Obsolete Documents</p> <p>When documents are no longer required, or have been superseded by subsequent versions, they shall be made obsolete, upon instruction of the document controller by moving the document to the System archive folder. Superseded documents shall be retained in accordance with the Quality Procedure <i>FMP-02 Record Management</i>.</p>	In compliance	Hard copy documents are no longer used, and review confirmed that all superseded electronic documents are archived in an archive folder on the FMC server.
5.8	<p>Location of Documents</p> <p>The master copies of documents shall be stored as outlined in the FMC Document Control Matrix. External reference documents (such as Codes of Practice, Australian Standards, etc.) shall be reviewed as a minimum during the planning phase of a disposal operation to ensure up-to-date versions are referenced in project documentation and that up-to-date copies are distributed.</p>	In compliance	All master copies of controlled documents are stored in the appropriate electronic folder in the IWDF Document Library on the FMC server.
FMP- 02 Records Management			
Purpose - This procedure addresses the control of all records at the IWDF and at the Facility Management Contractor (FMC) office(s), in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF and the Finance Management Procedure MP-07 Management of Records, to ensure that records associated with the management of the IWDF are legible, accessible, traceable, and protected against loss or damage.			
5.1	<p>Finance Record Control Requirements</p> <p>Finance record management requirements are outlined in <i>Finance-MP-07 – Management of Records</i>. Procedures for identification of records for retention, storage requirements and document retention periods shall be adhered to, as defined in Finance-MP-07.</p>	In compliance	Review confirmed that all critical documents such as monitoring reports etc. were provided to Finance with monthly reports and are then recorded on the Finance Records Management System. All

Section	Requirement	Status	Evidence / Comment
	<p>The Systems Manager shall ensure that all appropriate records are forwarded to Finance, as defined in the Finance Archiving Schedule (see MP-07).</p>		<p>monitoring reports for the reporting period are also included in this PCR which will be stored according to the Finance Archiving Schedule.</p>
5.2	<p>IWDF Site Record Management The following procedures relate to record management at the IWDF Site office during disposal operations or other extended occupation of the site.</p> <p>5.2.1 General Forms (proforma templates) shall be used in the recording of correspondence, field data, meetings/briefings and other activities relating to management of the IWDF.</p> <p>The Systems Manager shall ensure that the most-up-to-date revisions of forms are available and that they are listed on a Document Register (IWDF-Form-16).</p> <p>Paper copies of forms may be kept, where necessary (e.g., if electronic access is not possible for a limited period), but it is the responsibility of the user to ensure that it is the latest version of the form.</p> <p>5.2.2 Correspondence Control Correspondence includes hand-delivered correspondence and e-mails.</p> <p>All project-related incoming correspondence shall be registered on an Incoming Document Register (IWDF-Form-23) and filed in a Project Correspondence File.</p> <p>All project-related outgoing correspondence shall be recorded on an Outgoing Document Register (IWDF-Form-24) and filed in the Project Correspondence File.</p>	N/A	<p>No disposal operation occurred during reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>5.2.3 Chain of Custody A Chain of Custody Record (IWDF-Form-01) shall accompany all samples taken from the site for receipt by an analytical laboratory. Chain of Custody Records shall be registered on a Chain of Custody Register (IWDF-Form-02) and filed in the appropriate Project File.</p> <p>5.2.5 Filing and Storage All site records (correspondence, memos, telephone records, field notes, etc.) shall be filed in the appropriate project file, as outlined in the appropriate IWDF Filing Index (IWDF-Form-04), located in the site office or trench office, for the duration of the project site activities.</p> <p>At the end of a field project, all site records must be returned to the FMC contractor's office(s) in Perth and stored under the office record management system(s) (see below).</p>		
5.3	<p>FMC Office Record Management The following procedures relate to record management at the FMC offices during ongoing management or operational planning of IWDF activities.</p> <p>5.3.1 General Record keeping and management outside the IWDF (i.e., in the FMC offices) shall be undertaken in accordance with the procedures outlined in Section 5.2 for the IWDF site.</p> <p>However, different forms and registers (e.g., from the FMC company's quality system) may be used if they are deemed to be equivalent by the Systems Manager and provide the same level of quality control.</p>	In compliance	All FMC IWDF records were contained within the appropriate IWDF project folder. All records not forwarded to Finance are stored in accordance with the FMC company Quality Management System requirements.

Section	Requirement	Status	Evidence / Comment
	<p>5.3.2 Filing and Storage All site and office records (correspondence, memos, telephone records, field notes, etc.) shall be filed in the appropriate project file, as outlined in the applicable IWDF Filing Index (IWDF-Form-04 or equivalent), located in each FMC office.</p> <p>All site records that are not requested by the Systems Manager for forwarding to Finance for archiving as defined in the Finance Archiving Schedule (see MP-07), shall be stored in accordance with FMC company procedures.</p>		
<p>FMP-03 Training and Competency</p>			
<p>Purpose - This procedure addresses the training of personnel involved with all operational activities at, or associated with, the IWDF in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF. The purpose of the procedure is to ensure that all FMC staff involved with operations at, or associated with, the IWDF, are appropriately trained and qualified, including:</p> <ul style="list-style-type: none"> • increasing awareness of potential environmental and safety impacts of each position/role: and • understanding the requirements of the FMC procedures and management system. 			
5.1	<p>IWDF Management System Training/Induction</p> <p>5.1.1 Responsibilities Finance (or delegate) is responsible for training FMC personnel involved in IWDF activities in the implementation of the Finance Policy, Manual and relevant Finance Management Procedures.</p> <p>The FMC Systems Manager is responsible for training all FMC personnel (and the Earthworks Contractor Supervisor) involved in IWDF activities in the implementation of the FMC Operational, Environmental, Safety and Quality Procedures.</p>	In compliance	<p>Review of the 2020 - 2021 Training Register confirmed appropriate training was provided to all visitors to the IWDF and FMC personnel with a specific task at the IWDF.</p> <p>Two general inductions and an abridged general induction, for the regulator site visit, July 2020, were completed.</p>

Section	Requirement	Status	Evidence / Comment
	<p>5.1.2 Scope Roll-out training/new employee induction on the FMC management system shall provide details on:</p> <ul style="list-style-type: none"> • requirements of the system • importance of complying with the system • potential environmental and safety impacts of position • how to incorporate this knowledge into daily work practices. <p>5.1.3 Identification of training requirements The Systems Manager and Project Manager shall be responsible for identifying the training needs of FMC personnel. The identification of training needs shall be based on the:</p> <ul style="list-style-type: none"> • tasks the employee or contractor is required to undertake or is responsible for; and • necessary level of performance. <p>A Competency Matrix will identify the training requirements for all FMC personnel. This matrix will be used to undertake analysis of ongoing training needs.</p> <p>A training schedule will be developed by the Systems Manager and Project Manager for all FMC employees.</p> <p>5.1.4 Review of Training requirements Training reviews will be undertaken at least once a year, or under the following circumstances:</p> <ul style="list-style-type: none"> • when the job scope of an employee changes significantly; • if an employee continually fails to meet requirements; • after a major accident or incident; and/or • following changes to the management system. 		<p>There were no new FMC personnel during the reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>5.1.5 Training Records FMC training shall be recorded using the Management System Induction Form (IWDF-Form-48) and if necessary (e.g., for large numbers of attendees), an Attendance Sheet (IWDF-Form-25). The Systems Manager shall ensure that all FMC personnel are appropriately qualified and trained for their activities.</p> <p>Qualifications shall be recorded on a Competency Plan for each FMC employee (IWDF-Form-12a).</p>		
5.2	<p>On-site Operation-Specific Training</p> <p>5.2.1 Responsibilities The FMC Systems Manager and Operations Manager shall be responsible for identifying and reviewing all operation-specific training needs for all FMC personnel.</p> <p>The FMC Systems Manager and Site Safety Officer (and Radiation Safety Officer for radioactive waste activities) are responsible for undertaking all operation-specific site inductions.</p> <p>5.2.2 Scope The following inductions shall be undertaken:</p> <ul style="list-style-type: none"> • general IWDF site activities (General Safety Induction Form, IWDF-Form-32) • waste preparation, packaging, and handling activities (Waste Handling Safety Induction Form, IWDF-Form-33) • transport of waste to the IWDF (Transport Induction Form, IWDF-Form-37). <p>Site inductions shall provide details on:</p> <ul style="list-style-type: none"> • general rules and background information to activities; 	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • health and safety issues - hazards and controls (based on the IWDF Aspects (Health and Safety) and Impacts Register); • emergency response procedures; • environmental issues (based on the IWDF Aspects and Impacts (Environmental) Register); • operation-specific procedures/tasks; and • generic training materials will be available on the electronic system (IWDF Induction Handbooks) to accompany the Training procedure (FMP-03) but will also be updated on an operation-specific basis and stored on Operation project files. <p>Visitors and short-term personnel (such as maintenance contractors) shall undergo specifically tailored general induction (General Safety Induction Form, IWDF-Form-32).</p> <p>5.2.3 Identification of training requirements The Systems Manager and Operations Manager shall be responsible for identifying operation-specific induction and training needs.</p> <p>The identification of training needs shall be based on:</p> <ul style="list-style-type: none"> • tasks the employee or contractor is required to undertake or is responsible for; and • the necessary level of performance. <p>A Competency Matrix will be developed to identify the training requirements for all FMC personnel and contractors.</p> <p>An operation training schedule will be developed by the Systems Manager and Operations Manager for all FMC employees.</p>		

Section	Requirement	Status	Evidence / Comment
	<p>5.2.4 Review of training / competency requirements Training reviews will be undertaken at the commencement of an operation, or under the following circumstances:</p> <ul style="list-style-type: none"> • when the job scope of an employee changes significantly; • if an employee continually fails to meet requirements; • after a major accident or incident; and • following changes to the scope of an operation. <p>5.2.5 Training/Competency Records FMC induction training shall be recorded using the forms specified in 5.2.2 and if necessary (for large numbers of attendees), an Attendance Record (IWDF-Form-25).</p> <p>Competency tests shall be undertaken as part of all inductions to ensure that the induction has been effective.</p> <p>The Operations Manager shall ensure that all FMC personnel are appropriately trained for their activities on site.</p> <p>Training qualifications shall be recorded on the Operational Training Register (IWDF-Form-12b).</p> <p>5.2.6 Review of Training Effectiveness The effectiveness of training shall be reviewed through site audits and inspections, as outlined in FMC Management Procedure FMP-04 System Auditing and Compliance and Safety Procedure SP-02 Operation Site Safety Management.</p>		

Section	Requirement	Status	Evidence / Comment
FMP- 04 System Audits			
Purpose - This procedure addresses the internal auditing of Facility Management Contractor (FMC) activities at, or associated with, the IWDF, to ensure compliance with the requirements of the Finance Management System and FMC procedures for the IWDF.			
5.1	Audits of the FMC Operational, Environmental, Safety and FMC Management Procedures, as well as disposal operation-specific Operation Procedures, shall be undertaken to assess the following: <ul style="list-style-type: none"> • level of implementation of the procedures; • effectiveness of the procedures; • maintenance of the procedures; • conformance with the requirements of the Finance Management System; and • performance and compliance against Ministerial Conditions and Commitments. 	N/A	Not auditable – general information.
5.2	<p>Audit Frequency/Schedule</p> <p>The scheduling of audits shall be determined by the FMC Project Manager and the Systems Manager. This may be done using an Audit Schedule IWDF-Form-50.</p> <p>Ongoing FMC Operational, Environmental, Safety and Quality Procedures shall be audited annually.</p> <p>Operation-specific Operation Procedures (and associated Operational, Environmental, Safety and Quality Procedures) shall be audited at least once during a disposal operation. Finance shall be informed of the audit schedule. Personnel to be audited shall be notified of a pending audit at least two weeks before the audit commences.</p>	In compliance	See Appendix W for audit schedule. This audit table is evidence of annual audit.

Section	Requirement	Status	Evidence / Comment
5.3	<p>Audit Scope The basic scope of system audits shall be defined in a System Audit Checklist and shall include:</p> <ul style="list-style-type: none"> • activities to be audited (based on the significance of the activity and previous audit results); • documentation and records to be reviewed; • personnel to be interviewed and/or involved in the audit; and • methods of evidence collection and reporting. 	In compliance	All applicable auditable elements of the IWDF Management System were audited during this reporting period.
5.4	<p>Audit Team Each audit shall be undertaken by an audit team, comprising the Systems Manager and at least one other suitably qualified auditor. This will ensure that the auditor of a particular section of the system is external to the implementation of that section.</p>	In compliance	Audit undertaken by FMC Systems Manager and qualified auditor.
5.5	<p>Audit Reporting and Follow-up Audits shall be recorded on the <i>Audit Register (IWDF-Form-49)</i>.</p> <p>Non-conformances shall be recorded using <i>Corrective Action Requests (CAR) (IWDF-Form-10)</i>.</p> <p>Audit records/findings shall be documented in an <i>Audit Report</i> and used to determine the level of conformance achieved.</p> <p>The audit report shall contain the following:</p> <ul style="list-style-type: none"> • conformities and nonconformities; • records of CARs resulting from the audit (as generated by auditees); • follow-up of previous audit findings; • conclusions and recommendations for changes to system for consideration at 	In compliance	<p>Audit Register was sighted verifying that it included all annual audits from 2008 to 2021.</p> <p>This audit table comprises report results for this reporting period.</p> <p>Audit findings were provided to Finance as part of the draft PCR for the reporting period.</p> <p>As there were no noncompliances a meeting was not required.</p>

Section	Requirement	Status	Evidence / Comment
	<p>Management Review (see below).</p> <ul style="list-style-type: none"> effectiveness of the system in achieving Finance objectives and targets. <p>A draft of the report shall be forwarded to the FMC Project Manager for review, prior to submission to Finance for review. A meeting shall then be held between the Finance Project Manager, Systems Manager, FMC Project Manager, and auditor to discuss the findings of the audit and to develop a plan to implement and assess the effectiveness of the necessary corrective actions.</p>		
FMP- 05 Control of Non-Conformances			
<p>Purpose: This procedure addresses the reporting, recording, investigating and implementation of system non-conformances and corrective actions associated with the management of the IWDF, to ensure that any FMC system deficiencies are corrected or prevented.</p>			
5.1	<p>Identification of Non-Conformances</p> <p>Non-conformances (or potential non-conformances) may be identified through the following:</p> <ul style="list-style-type: none"> accident/incident audit inspection general activities. <p>Non-conformances can be system non-conformances (e.g., system procedure is not implemented) or operational non-conformances (e.g., failure of waste package, or other incident or accident). System non-conformances are addressed in the following sections. Operational non-conformances are addressed in Safety Procedure ERP-01 Incident Prevention, Reporting, and Investigation.</p>	N/A	Not auditable – general information.

Section	Requirement	Status	Evidence / Comment
5.2	<p>Reporting of System Non-Conformances When a system non-conformance is identified a <i>Corrective Action Request (CAR)</i> form (IWDF-Form-10) shall be completed by the identifier and forwarded to the Systems Manager for action. The CAR shall be registered on a <i>CAR Register (IWDF-Form-11)</i> by the receiver.</p> <p>Potential non-conformances and suggestions for improvement may also be reported using a CAR.</p>	N/A	No system noncompliances were identified during reporting period.
5.3	<p>Development and Implementation of Corrective/Preventive Actions The Systems Manager shall assess the CAR, in conjunction with the Project Manager (for off-site issues) or the Operations Manager (for on-site issues).</p> <p>Corrective/preventive actions to address the non-conformance shall be formulated and detailed on the CAR.</p> <p>A program for the implementation of the corrective/preventive actions shall be developed and reviewed regularly until the action is implemented, found to be effective and closed out.</p> <p>All procedures or other documentation shall be updated and redistributed accordingly, in accordance with FMC Management Procedure FMP-01 <i>Document and Data Control</i>.</p>	N/A	No system noncompliances were identified during reporting period.
5.4	<p>Management Review All CARs and their implementation shall be reported at IWDF Management Review meetings, in accordance with Finance Management Procedure MP-12 Management Review.</p>	In compliance	No CARS were recorded for the FMC system, result was reported at the Management Review Meeting held 10 June 2021. See Appendix R.

Section	Requirement	Status	Evidence / Comment
6.	The Systems Manager shall ensure that all records are filed in accordance with FMC Management Procedure FMP-02 Record Management.	In compliance	Review confirmed all records were filed in the appropriate IWDF FMC Project folders.
FMP- 06 Control and Maintenance of Equipment			
Purpose: This procedure addresses the control, calibration and maintenance of quality-critical inspection, measuring and test equipment associated with the operational management of the Intractable Waste Disposal Facility (IWDF).			
5.1	<p>Identification and Registration of Monitoring, Measuring and Test Equipment The Operations Manager and the user (or supervisor) of a piece of all monitoring, measuring and test equipment shall be responsible for ensuring that the equipment is calibrated or checked to manufacturers recommendations.</p> <p>The Operations Manager shall ensure that all FMC monitoring, measuring, and test equipment is recorded on Equipment Maintenance and Calibration List (IWDF-Form-40) stored in the Operation Manager’s office files. Separate lists may be produced on an operation-specific basis.</p> <p>Operation lists shall be stored at the IWDF site during site activities. The user and Operations Manager shall ensure that all equipment has a precision and sensitivity appropriate with the requirements of the monitoring, measurements, or tests.</p>	In compliance	Equipment Maintenance and Calibration List (IWDF-40) was sighted for water monitoring equipment used during Oct 2020 water monitoring event.
5.2	<p>Calibration and Checking of Monitoring, Measuring and Test Equipment All equipment requiring calibration shall be calibrated in accordance with manufacturer’s instructions. Hired equipment, or equipment used by a subcontractor shall be provided with calibration documents by the supplier and these shall be checked by the user.</p> <p>Equipment owned by Finance or the FMC, shall be calibrated by the user of the</p>	In compliance	Equipment Maintenance and Calibration List (IWDF-40) was sighted for water monitoring equipment used during Oct 2020 water monitoring event.

Section	Requirement	Status	Evidence / Comment
	<p>equipment. The calibration method and history of each piece of equipment shall be recorded using a <i>Maintenance and Calibration Register (IWDF-Form-41)</i>. Records provided by the supplier of a piece of equipment should be attached to this checklist.</p>		
5.3	<p>Non-Conformances Items of equipment that do not pass their calibration/checking or maintenance checks shall be clearly tagged to identify them as non-operational and removed from use.</p> <p>Such equipment shall only be reused upon positive results from re-calibration or maintenance. If equipment is faulty, a corrective action report (CAR) shall be raised and corrective actions undertaken, in accordance with Quality Procedure FMP-05 System Control of Non-Conformances.</p>	N/A	Interview with Operations Manager and review of documentation confirmed that no equipment failed calibration/checking.
5.4	<p>Other Equipment Maintenance All equipment shall be maintained to ensure a safe working environment. The Operations Manager shall ensure that Finance or FMC owned equipment that is used for IWDF activities and that requires maintenance is recorded on the <i>Equipment Maintenance and Calibration List (IWDF-Form-40)</i>. Separate lists may be produced on an operation-specific basis.</p> <p>The user and Operations Manager shall ensure that all equipment is suitable for its intended use. The maintenance method and history of each piece of equipment shall be recorded using a <i>Maintenance and Calibration Register (IWDF-Form-41)</i>. Records provided by a maintenance contractor should be attached to this checklist. The maintenance of contractor-owned equipment shall be the responsibility of the contractor.</p>	In compliance	Equipment Maintenance and Calibration List (IWDF-40) was sighted for water monitoring equipment used during Oct 2020 water monitoring event.

FMC Environmental Procedures

Section	Requirement	Status	Evidence / Comment
EP-01 Vegetation (Flora) Management			
Purpose: Addresses the management of vegetation at the IWDF.			
5.1	<p>Flora Surveys Previous floristic assessments of the site reserve and the access road reserve have not identified any Declared Rare Flora (DRF) to be present (PVG Environmental, 2014). One priority species was identified. The locations of the priority species have been mapped (PVG Environmental, 2014). These locations shall be reviewed prior to any clearing activities. Clearing in areas identified as containing rare or priority species shall be avoided.</p> <p>The “Declared Rare Flora Database” is updated annually. Prior to any clearing (e.g., prior to the commencement of an operation), the list current at the time of development should be searched to determine the conservation status of rare and priority flora species and to check if species have been added or removed from the list.</p> <p>If significant changes in the conservation status of flora likely to be found at the IWDF occur, or as otherwise directed by Finance, a floristic reassessment of the site may be undertaken.</p>	In compliance	<p>The location of the priority species is recorded on the monitoring locations figure. Updated monitoring locations figure, with the 2020NRT01 disposal cell included, is provided at Figure 4 of this PCR.</p> <p>Florabase was consulted Oct 2020 and the Flora Identification Kit was reviewed prior to the Oct monitoring event.</p> <p>No clearing occurred during the audit / reporting period.</p>
5.2	<p>Clearance of Vegetation Unnecessary clearance or disturbance of native flora shall always be avoided. Clearance of vegetation shall only be undertaken under the direction of the Operations Manager, with advice from the Environment Manager and Botanist.</p>	N/A	No clearing occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>The following clearing shall be permitted following approval by the Operations Manager:</p> <ul style="list-style-type: none"> • Firebreaks • New disposal trenches and surrounding areas required for vehicle access • Other areas of development as approved by Finance or the Operations Manager. <p>If an area is to be cleared that lies close to, or at, an area where a priority species has been identified, the priority species plant(s) shall be identified, marked in the field, and avoided if at all possible.</p> <p>If a priority species plant must be cleared, DWER shall be informed of the clearance, prior to clearing (although this is not a statutory requirement).</p> <p>Off-road (track) vehicle usage is strictly prohibited, without prior consent by the Operations Manager.</p> <p>The identification of rare flora or priority species shall be aided wherever possible using flora identification kits (see below).</p>		
5.3	<p>Flora Identification</p> <p>Available flora identification kit shall be maintained (and updated as necessary) for priority species (and any rare flora that may be identified in the future) known to occur at the IWDF.</p> <p>Where possible, the flora identification kits shall be referred to prior to clearing activities on the existing site to identify rare flora or priority species which may be impacted by proposed clearing.</p>	In compliance	<p>Florabase was consulted Oct 2020 and the Flora Identification Kit was reviewed prior to the October monitoring event.</p> <p>No clearing occurred during the audit / reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>If there is uncertainty in the identification of flora in an area designated for clearing, a botanist may be brought up to site prior to significant clearing activities, particularly where priority species may be in, or close to, the area to be cleared.</p> <p>If rare flora or priority species are identified, efforts will be made to clear in alternative areas.</p>		
5.4	<p>Weed Identification The weed identification kit shall be maintained for weeds (non-native plants, which may have a detrimental impact on local flora) that are known, or likely to occur at the IWDF.</p> <p>Where possible, the weed identification kit shall be referred to during activities on the existing site.</p> <p>If weeds are identified, they shall be removed at the direction of the Operations Manager (and botanist, if required).</p>	In compliance	Weed Identification Kit was reviewed Oct 2020.
5.5	<p>Rehabilitation Management of rehabilitation of cleared areas is detailed in Environmental Procedure EP-05 Rehabilitation Management.</p>	N/A	See EP-05 Rehabilitation Management.
5.6	<p>Dust Suppression Dust suppression techniques shall be used during construction and disposal activities to reduce impact to adjacent vegetation from excess, or contaminated, dust.</p>	N/A	See EP-06 Air Quality and Dust
EP- 02 Fauna Management			
Purpose: Addresses management of native fauna at the IWDF.			

Section	Requirement	Status	Evidence / Comment
5.1	<p>Fauna Surveys</p> <p>A survey of terrestrial vertebrates was undertaken at the IWDF site in 2009 (Coffey Environments, 2009). Birds were not included in the survey due to their high mobility, which places them at little risk of disturbance by site activities.</p> <p>The survey concluded the following:</p> <ul style="list-style-type: none"> • the site is characterised by a reasonably diverse community of terrestrial vertebrates; • all the recorded species have extensive distributions outside the site; • none of the recorded species can be considered rare or endangered; and • the impact of the facility will be small in relation to the total area of the sand-plain and to the community of vertebrate species. 	N/A	Not auditable – general information.
5.2	Native fauna is protected by law. Unauthorised killing or interference with native fauna is prohibited. All site personnel shall notify the Environment Manager or Operations Manager of potential or actual impacts on native fauna and habitat areas.	In compliance	Review of incident records confirmed that no incident reports related to native fauna were made during the audit / reporting period.
5.3	<p>Clearance of Vegetation</p> <p>Unnecessary clearance or disturbance of vegetation (the natural habitats for native fauna) shall always be avoided.</p> <p>Off-road vehicle usage is strictly prohibited, unless authorised by the Operations Manager.</p> <p>Clearance of vegetation shall only be undertaken under the direction of the Operations Manager.</p>	In compliance	See EP-01. No clearing occurred during the audit / reporting period.
5.4	Fauna Injuries or Deaths	N/A	No fauna death or injuries were reported during the audit / reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>Fauna injuries or deaths shall be treated as environmental incidents and reported to the Environment Manager or Operations Manager.</p> <p>Management of environmental incidents is detailed in Environmental Procedure EP-09 Environmental Incident Management</p>		
5.5	<p>Road Kills Drivers of vehicles within the IWDF site shall be aware of native fauna when driving on all tracks and roads.</p> <p>Where possible, roadkill shall be removed from the road, to prevent animals feeding on the carcass also being run down.</p>	N/A	Review of incident records confirmed that no incident reports related to roadkill were made during the audit / reporting period.
5.6	<p>Open Excavations and Boreholes Open trenches or excavations shall have an egress to allow trapped animals to exit the trench. (All disposal trenches have a ramp as part of the current trench design).</p> <p>Any drill hole, borehole or monitoring bore shall be filled, plugged, or capped, after completion, to avoid unnecessary trapping of animals in the open hole.</p>	In compliance	Visual inspection confirmed that the bores sighted were capped. The Operations Manager confirmed that all monitoring bores were capped.
5.7	<p>Feral Animals and Pets Feral animals shall be discouraged from the camp area, wherever possible, by the careful management of camp waste (to avoid odours, which may attract feral animals).</p> <p>Management of camp waste is detailed in Environmental Procedure EP-07 Waste Management.</p> <p>Pets (domestic animals) are not permitted on-site.</p>	N/A	Verbal communication with Operations Manager and other IWDF personnel confirmed that no feral animals were sighted at the camp area during visits.

Section	Requirement	Status	Evidence / Comment
5.8	<p>Firearms Unauthorised killing or interference with native fauna is prohibited. Firearms are prohibited at the site.</p>	N/A	Not auditable – general information.
5.9	<p>Rehabilitation Management of rehabilitation of cleared areas is detailed in Environmental Procedure EP-05 Rehabilitation Management.</p>	N/A	See EP-05 Rehabilitation Management.
5.10	<p>Dust Suppression Dust suppression techniques shall be used during construction and disposal activities to reduce impact to adjacent vegetation (and hence fauna habitats) from excess, or contaminated, dust.</p> <p>Management of dust generation is detailed in Environmental Procedure EP-06 Air Quality and Dust Management.</p>	N/A	See EP-06 Air Quality and Dust Management.
EP-03 Environmental Monitoring Management			
Purpose: Addresses the monitoring of the impact of waste disposal activities at the IWDF on the environment.			
5.1	<p>Scheduling and Management of Monitoring Programs FMC shall coordinate all IWDF ongoing monitoring programs, through yearly monitoring schedules.</p> <p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules.</p>	In compliance	<p>Monitoring records verify that all monitoring, required during audit period, was undertaken according to the schedule.</p> <p>See Appendix N for rehabilitation monitoring records, Appendix V for</p>

Section	Requirement	Status	Evidence / Comment
	<p>The FMC Environment Manager shall ensure that monitoring records are appropriately registered, distributed and filed in accordance with the specific instruction for the monitoring.</p> <p>5.2.1 Groundwater Monitoring Procedures for ongoing groundwater monitoring are given in Environmental Instruction EI-01.</p> <p>5.2.2 Radiation Monitoring Procedures for ongoing radiation monitoring are given in Radiation Instruction RI-01. Ongoing radiation monitoring will be undertaken every 5 years.</p>		<p>groundwater monitoring results, Appendix Z for capping monitoring records.</p> <p>Gamma radiation monitoring was not required during the reporting period.</p>
5.3	<p>Operation-Specific Monitoring</p> <p>5.3.1 Groundwater Monitoring Groundwater monitoring shall be undertaken prior to the onset of waste disposal activities and following waste disposal activities, for any waste disposal operation. This may coincide with the ongoing groundwater monitoring.</p> <p>5.3.2 Radiation Monitoring Radiation monitoring shall be undertaken prior to the onset of waste disposal activities and following waste disposal activities, for any waste disposal operation involving the disposal of radioactive wastes. Procedures for radiation monitoring are given in Radiation Instruction RI-01.</p> <p>5.3.3 Soil Sampling Pre-disposal and post-disposal soil samples shall be collected from locations around each disposal trench.</p>	In compliance	<p>Groundwater monitoring was completed Oct 2020, and Apr 2021. See Appendix V.</p> <p>Radiation monitoring was not required.</p> <p>As a disposal operation did not occur during the reporting period no other sampling or monitoring was required.</p>

Section	Requirement	Status	Evidence / Comment
	<p>Procedures for soil sampling are given in Environmental Instruction EI-02 with reference to the Operation Environmental and Waste Acceptance Procedures (OEWP) for the specific waste disposal operation.</p> <p>5.3.4 Dust Sampling Pre-disposal and syn-disposal dust monitoring shall be undertaken at locations around each disposal trench.</p> <p>Procedures for dust monitoring are given in Environmental Instruction EI-02 with reference to the Operation Environmental Procedures (OEP) for the specific waste disposal operation.</p>		
5.4	<p>Specific/Validation Sampling In the event of a spill, or suspected spill of waste material, additional validation sampling shall be undertaken as outlined in Environmental Instructions EI-01, 02 and Radiation Instruction RI-01 with reference to the Operation Environmental and Waste Acceptance Procedures (OEWP) for the specific waste disposal operation.</p>	N/A	
5.5	<p>Maintenance and Calibration of Monitoring Equipment The Operations Manager shall ensure that all monitoring equipment used at the site undergoes regular maintenance and calibration in accordance with FMC Management Procedure FMP-06 Control of Monitoring, Measuring and Test Equipment.</p>	In compliance	See FMP-06 Control of Monitoring, Measuring and Test Equipment.
5.6	<p>Review of Monitoring Programme The monitoring program shall be reviewed annually, as part of the annual Finance Management Review Meeting (Finance MP-12). Review may include the details of the program (such as appropriate numbers of monitoring bores and locations of radiation surveys).</p>	In compliance	The monitoring program was reviewed by the FMC and presented at the Management Review Meetings. See Appendix R for Management Review Meeting minutes.

Section	Requirement	Status	Evidence / Comment
6.	<p>The results of FMC monitoring activities shall be documented and placed on the appropriate file (as per FMC Management Procedure FMP-02 Record Management). The Radiation Safety Officer and the Environment Manager shall report all results of FMC monitoring to the FMC Project Manager.</p> <p>The Project Manager shall forward results of all FMC environmental monitoring to the Finance Project Manager within 14 days of monitoring (or within 14 days of receipt of monitoring results). If abnormalities or exceedances are identified, the Finance Project Manager shall be informed as soon as practicable.</p> <p>Monitoring results shall be reported in the Performance & Compliance Report.</p>	In compliance	All monitoring results were provided to Finance with the monthly report for the month after the monitoring was completed. Monitoring results are reported in this PCR. See monitoring results in Section 5 of this PCR report.
EP-04 Water Management			
Purpose: Addresses surface water management at the IWDF.			
5.1	<p>Project Planning in Relation to Seasonal Conditions</p> <p>The Operations Manager and FMC Project Manager shall liaise with Finance in relation to an appropriate time for field operations to take place at the IWDF, given weather (rainfall) data available for the site.</p> <p>Possible delays in field activities due to seasonal (and unseasonal) rainfall shall be considered when developing project schedules and budgets.</p>	In compliance	Review of project schedule and estimated budget confirmed that contingency had been included for possible delays due to unseasonal rainfall during non-disposal site inspection events.
5.2	Surface Topography Management and Drainage Design	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>Surface topographic contour maps and aerial photographs for the site shall be referenced by the Operations Manager during positioning of future disposal trenches and the development of site drainage systems.</p> <p>Each disposal trench shall be constructed with an elevated clay dome, which acts to shed water away from the disposal location, in accordance with the construction specification for the trench.</p> <p>V-drains shall be constructed to divert surface water runoff away from trench areas.</p> <p>Each completed (capped) disposal trench shall be surrounded by a V-drain as outlined in the construction specification (CS) for the trench.</p> <p>V-drains shall be maintained (re-cut) as required to ensure adequate capacity, particularly during winter months and after periods of high rainfall.</p>		
5.3	<p>Operation Weather Reporting and Surface Water Management</p> <p>During excavation and filling of disposal trenches, the Operations Manager shall assess weather conditions daily (or as otherwise required). This may include a request to Finance for weather reports from the Bureau of Meteorology, examination of the temporary weather station at the trench office, or online weather reports.</p> <p>During excavation and filling of disposal trenches, sand & gravel windrows shall be present around the perimeter of the trench, except for the ramp end of the trench.</p> <p>If heavy rainfall is expected, or possible, the Operations Manager shall ensure that temporary soil (ideally clay) berms are constructed at the top of the ramp, to prevent</p>	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>surface water runoff down the ramp into the trench. Temporary v-drains may also be constructed to aid local drainage.</p> <p>If waste is present within the disposal trench, sand & gravel shall be placed above the waste to a thickness of at least 250mm and shall be compacted as far as practicable. Clay berms may also be placed to surround the waste.</p> <p>Waste unloading and placement activities shall be suspended if heavy rain threatens or is falling, at the direction of the Operations Manager (or Earthworks Contractor Supervisor).</p>		
5.4	<p>Management of Accumulated Water in Trench</p> <p>If a significant amount of water collects in an open disposal trench (e.g., because of unforeseen rainfall), the water may be managed in one of the following ways:</p> <ul style="list-style-type: none"> • the water shall be allowed to dry out in situ; and / or • the water shall be soaked up by the introduction of sand and gravel or clay material into the trench, which would then be removed from the trench to a nearby area to dry. <p>The dried material shall be placed back into the trench as part of the fill/capping material. The water shall be pumped out to a designated evaporation area (evaporation pond).</p> <p>If waste is present within the trench (even if it is buried beneath sand cover), or if contamination of the water with waste material is suspected, sampling and analysis of the pumped water may be undertaken for waste constituents.</p>	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
EP-05 Rehabilitation Management			
Purpose: Addresses rehabilitation management at the IWDF.			
5.1	<p>Rehabilitation of Disposal Trench Surrounds</p> <p>The Operations Manager and Environment Manager shall ensure that vegetation and topsoil cleared from the site of a proposed disposal trench are stockpiled in a position close to the trench. Stockpiles shall be windrowed where possible.</p> <p>The maximum height of topsoil stockpiles shall be 2 m.</p> <p>On completion of a disposal trench (i.e., following completion of the water shedding clay dome) cleared areas surrounding the trench shall be rehabilitated by spreading the stockpiled vegetation and soil stockpiles evenly across the areas.</p> <p>The rehabilitated areas shall be tined/ripped to facilitate the infiltration of rainwater and aid revegetation, in accordance with Operation Construction Specifications (CS).</p>	N/A	No disposal operation occurred during the reporting period.
5.2	<p>Rehabilitation of Tracks</p> <p>Tracks used for access to the disposal compounds currently in use shall be kept clear of vegetation by vehicle use and re-grading where necessary.</p> <p>Tracks used for access to drill hole locations or other locations which are no longer used shall be allowed to revegetate naturally.</p> <p>Temporary tracks shall be constructed in a manner to preserve the topsoil and younger plants in situ to assist natural revegetation (i.e., avoiding grubbing or soil removal).</p>	N/A	No new tracks constructed during this reporting period.

Section	Requirement	Status	Evidence / Comment
5.3	<p>Rehabilitation of Oversize Silcrete Disposal Area</p> <p>The Operations Manager shall ensure that all oversize silcrete material generated during the excavation of silcrete for a disposal trench is removed to a dedicated oversize silcrete disposal area.</p> <p>The Operations Manager shall ensure that vegetation and soil cleared from the site of an oversize silcrete disposal pit are stockpiled in a position close to the pit.</p> <p>Stockpiles shall be windrowed where possible. The maximum height of topsoil stockpiles shall be 2 m.</p> <p>On completion of a disposal pit the silcrete shall be covered with the stockpiled sand and gravel to form a low mound (a maximum height of 1 m above ground level). The mound, as well as cleared areas adjacent to the pit shall be rehabilitated by spreading the stockpiled vegetation and soil stockpiles evenly across the areas.</p> <p>The rehabilitated areas shall be ripped to aid revegetation, in accordance with Operation Construction Specifications (CS).</p>	N/A	No disposal operation occurred during the reporting period.
5.4	<p>Rehabilitation of Borrow Pits</p> <p>Borrow pits are located at several locations along the access road to the IWDF.</p> <p>If borrow pits are likely to continue to be used during the operational period of the IWDF), their rehabilitation shall be addressed as part of the decommissioning rehabilitation plan (see below).</p> <p>Decommissioned/completed borrow pits shall be contoured, topsoil replaced and ripped to aid rehabilitation.</p>	N/A	No borrow pits have been decommissioned to date.

Section	Requirement	Status	Evidence / Comment
5.5	<p>Monitoring of Rehabilitation The Operations Manager and Environment Manager shall ensure that areas undergoing rehabilitation are monitored on a regular (yearly) basis, to determine progress and effectiveness of revegetation, in accordance with Environmental Instruction EI-04, Rehabilitation Monitoring.</p>	In compliance	See Appendix N for records of Oct 2020 rehabilitation monitoring.
5.6	<p>Seed Collection There are currently no plans to undertake local native seed collection or to use available regional seed stocks.</p> <p>However, if rehabilitation monitoring indicates that unassisted (unseeded) rehabilitation is not achieving targets (as defined in the IWDF Decommissioning and Rehabilitation Plan) a seed collection strategy will be put in place.</p>	N/A	Not required as all revegetated areas have been achieving targets.
5.7	<p>Post-Decommissioning Rehabilitation of the Site A decommissioning and rehabilitation plan shall be produced upon direction by Finance.</p>	N/A	There are currently no plans to decommission the site.
EP-06 Air Quality and Dust Management			
Purpose: Addresses air quality and dust management at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
EP-07 Waste Management			
Purpose: Addresses the management of non-intractable waste at the IWDF.			

Section	Requirement	Status	Evidence / Comment
5.1	<p>Camp Waste The Operations Manager shall ensure that all food waste, litter, and other domestic waste materials are crushed, wherever possible, to reduce their volume prior to being placed in rubbish bags and stored in a rubbish trailer on site. The burying or burning of camp waste on site is not permitted.</p> <p>The waste shall be collected and transported off-site by Earthworks Contactor personnel and disposed of at the Southern Cross or Coolgardie municipal landfills.</p> <p>When contractor personnel are transporting the rubbish trailer, loads must be secured appropriately so that no waste leaves the vehicle during transit. Camp waste shall be transported off site as regularly as possible to minimise odour, flies, and maggots (ideally once per week, particularly during summer months).</p>	In compliance	Interview with monitoring personnel confirmed that all domestic waste was placed in rubbish bags and removed from site at the completion of site monitoring events and other non-disposal site visits.
5.2	<p>Sewerage Septic tanks and leach drains have been installed for the existing accommodation and messing facilities. Temporary facilities (e.g., contractor kitchen and ablution blocks) shall be connected to the septic system by a qualified plumber at commencement of disposal operations.</p> <p>The status of the septic system should be checked by a qualified plumber every 5 years.</p>	In compliance	Status of septic system was checked Oct 2018 and was found to be satisfactory.
5.3	<p>Storage and Disposal of Fuel and Waste Oil Management of hydrocarbons (fuels and oils) is detailed in Environmental Procedure EP-08 Fuel, Oil & Hazardous Materials Management.</p>	In compliance	See EP-08 Fuel, Oil & Hazardous Materials Management in this table.

Section	Requirement	Status	Evidence / Comment
5.4	<p>Recycling</p> <p>Recycling facilities are not available in Coolgardie, Southern Cross but are available in Kalgoorlie. Hence, the generation of camp waste shall be minimised, where practicable, to reduce the amount of waste requiring disposal to landfill by: ordering in bulk, where practicable; compacting waste (such as cans, cartons, and boxes).</p>	In compliance	Interview with FMC Operations Manager confirmed that cans, cartons, and boxes were compacted before being removed from site for disposal.
EP-08 Fuel, Oil and Hazardous Materials Management			
Purpose: Addresses the management of fuels, oils, and other hazardous materials at the IWDF.			
5.1	<p>Transport of Fuels</p> <p>The Earthworks Contractor shall ensure that the requirements of the Australian Dangerous Goods Code and the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 are always followed.</p> <p>These requirements include the following:</p> <ul style="list-style-type: none"> • the vehicle shall be appropriately licensed; • any fuel drums must be secured against vertical and horizontal movement; • the vehicle must carry the appropriate type and size of fire extinguisher (e.g., 9 litre foam); • appropriate shipping documents must be carried; and • the vehicle must have the appropriate signage for the substances carried (i.e. Flammable Liquid Class 3). 	N/A	No disposal occurred during reporting period. No fuel was delivered during reporting period but 200L of diesel fuel was appropriately transported to the IWDF by the FMC during the Oct 2020 site visit.
5.2	<p>Storage of Fuels, Oils, and other Hazardous Materials</p> <p>Fuels and other hazardous materials shall be stored in accordance with the Dangerous Goods Safety (Storage and Handling of non-explosives) Regulations 2007 and AS 1940-2017 and amendments.</p>	In compliance	Observation verified that all fuels were stored in the appropriately banded fuel storage area. The fuel storage area was upgraded during the 2020NRT01 disposal.

Section	Requirement	Status	Evidence / Comment
	<p>Fuels shall be stored within the bunded fuel storage area at the site camp, in accordance with the Dangerous Goods Safety (Storage and Handling of non-explosives) Regulations 2007 and AS 1940 - 2017 and amendments.</p> <p>An inventory of dangerous goods stored at the site shall be maintained, using IWDF-Form-51 Dangerous Goods Storage Record. This record shall be updated upon delivery of fuels and oils and at the beginning and end of each disposal operation.</p> <p>Diesel shall be stored in the 2,000 litre above ground storage tank located within the bunded area.</p> <p>Other fuel, such as unleaded petrol (a maximum of 300L), and oils, shall be stored in drums within the bunded area. Drums shall always remain upright.</p> <p>Temporary storage of small volumes of diesel fuel or oil (e.g., up to 500L) shall be permitted at the trench location, for maintenance purposes, during excavation, waste disposal and capping activities if temporary bunding is put in place (e.g., a containment pallet).</p> <p>Safety precautions shall be implemented at the storage locations to minimise the risk of fire, including the following:</p> <ul style="list-style-type: none"> • Storage area shall be kept free of flammable vegetation. • Fire extinguishers shall be positioned in proximity. • Smoking shall not be permitted within 10 m of the storage area. <p>The Safety Manager shall ensure that Safety Data Sheets (SDSs) for all fuels, oils and other hazardous materials are available at site (site office).</p>		<p>See Appendix AA for Dangerous Goods Storage records.</p> <p>No drums of fuel were left on site during periods of ongoing management.</p> <p>On site observation also verified that SDSs were available for all fuels, oils and hazardous materials thought to be on site.</p> <p>SDS information is now maintained in electronic format as well as hardcopy.</p> <p>Fuel storage area was free of flammable vegetation and a new fire extinguisher was present.</p>

Section	Requirement	Status	Evidence / Comment
5.3	<p>Use of Fuels and Oils</p> <p>The use of fuel and oils shall be minimised wherever possible, whilst still allowing sufficient maintenance of equipment and machinery.</p> <p>Refuelling activities, vehicle and generator servicing and fuel storage shall be managed to minimise both the risk of spillages occurring and the damage to the environment should the spillage occur.</p> <p>Management controls shall include:</p> <ul style="list-style-type: none"> • Bunding storage areas (e.g., using spill trays/portable bunds). • Clean-up of spillages, including capture of further leaks/spills in drums or other approved storage containers. • Removal of soil affected by the spillage (see below). • Hydrocarbons shall be handled in accordance with safety instructions in the Safety Data Sheets (SDSs) available at site (site office). 	In compliance	Interview with site personnel confirmed that refuelling tasks such as refuelling the generator were undertaken using spill trays. Review of incident records demonstrated that no reportable spills occurred.
5.4	<p>Emergency Spill Response</p> <p>Procedures for Emergency Spill Response are outlined in Emergency Response Procedure ERP-01 Incident Prevention, Reporting, and Investigation and ERI-02 Waste/Spill Incident Response Procedures.</p> <p>All spillages of fuels, oils or other hazardous materials shall be reported, as soon as practicable, to the Operations Manager.</p> <p>All spillages shall be cleaned up, as soon as practicable, under direction of the Operations Manager.</p>	In compliance	<p>No spills were reported. As the IWDF is unmanned during non-disposal periods spill kits are stored in the sea container at the IWDF during non-disposal periods.</p> <p>SDS file sighted in the site office during site visit and are available on the IWDF laptop and the FMC project folder.</p>

Section	Requirement	Status	Evidence / Comment
	<p>Further leaks or spills shall be captured in drums or other approved storage containers until the cause of the leak can be rectified.</p> <p>Fuels, oils, and other hazardous materials shall be handled in accordance with safety instructions in the Materials Safety Data Sheets (MSDSs) available at site (site office). Disposal of hydrocarbon contaminated soil is detailed below.</p>		
5.5	<p>Disposal of Contaminated Soil Contaminated soil shall be managed in one of the following ways:</p> <ul style="list-style-type: none"> • Contaminated soil shall be placed in the trench as part of the waste fill or backfill. • Hydrocarbon-contaminated soil shall be spread thinly over a cleared area to allow for natural remediation, prior to stockpiling and placement in the trench. 	N/A	No reportable spills occurred during this audit period.
5.6	<p>Storage and Disposal of Waste Fuels and Oils At the camp site or the trench location, drums or containers labelled "Waste Oil" shall be used for the disposal/storage of any waste oils which have been generated during the servicing of equipment, vehicles, and camp generators.</p> <p>Funnels shall be used to prevent any spillage while transferring waste oil into the drums.</p> <p>Drums shall be kept closed when not being filled. Oil filters shall also be emptied into the waste oil drums.</p> <p>When nearly full, the drums shall be disposed at an approved waste oil disposal site (e.g., in Kalgoorlie) by Earthwork's contractor personnel.</p>	In compliance	As no waste disposal operation occurred during the reporting period no waste oil drums were stored at the IWDF.

Section	Requirement	Status	Evidence / Comment
5.7	<p>Disposal of Empty Drums/Containers All emptied fuel and oil drums shall be taken off site to be re-filled, re-used, or delivered to an authorised landfill for disposal.</p>	N/A	As no waste disposal operation occurred during the reporting period no waste oil drums were stored at the IWDF.
EI-01 Groundwater Monitoring			
Purpose: Must be followed for the ongoing monitoring of groundwater at the IWDF site. Monitoring for the presence of groundwater and of groundwater quality (should groundwater be found) is required to assess the potential impact of buried waste on groundwater.			
5.1	<p>Nomenclature and Recording Monitoring locations are to be recorded using standard nomenclature, such as: 2008-GM1-01. Where:</p> <ul style="list-style-type: none"> • The first set of numbers relates to the year • The second set of numbers refers to the monitoring location which should be referenced on a map or diagram • The last two numbers identify the sample number at that location. • Each monitoring event is to be recorded using the Sampling/Monitoring Record Form (IWDF-Form-03). 	In compliance	See Figure 4 for appropriately named monitoring locations and Appendix V for groundwater monitoring records.
5.2	<p>Monitoring Locations The monitoring bore locations are recorded on a Monitoring Location Figure, which shall be updated as new locations are added.</p>	In Compliance	See Figure 4 of this PCR.
5.3	<p>Monitoring Schedule Finance shall coordinate all groundwater monitoring through yearly monitoring schedules. The FMC will undertake the monitoring.</p>	In compliance	Monitoring events have been recorded on a Monitoring Register IWDF-Form-39.

Section	Requirement	Status	Evidence / Comment
	<p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules.</p> <p>Groundwater monitoring shall be undertaken every 6 months (if no groundwater is encountered) or every 3 months (if groundwater is encountered). Successive monitoring events are to be recorded on a Monitoring Register IWDF-Form-39.</p>		<p>See Appendix V for groundwater monitoring records.</p>
5.4	<p>Maintenance and Calibration of Monitoring Equipment</p> <p>The Operations Manager shall ensure that the monitoring equipment (i.e., the groundwater monitoring probe) used at the site undergoes regular maintenance and calibration in accordance with FMC Management Procedure FMP-06 Control and Maintenance of Equipment.</p> <p>The groundwater monitoring probe shall be located at the FMC offices in Perth (during periods when no site activities are underway) or in the site office or store (during disposal activities).</p> <p>Site personnel undertaking groundwater monitoring (Environment Manager) shall ensure that the groundwater monitoring probe is calibrated prior to each monitoring event by dipping the probe in water and checking for the signal. The results of the calibration test shall be recorded on the Sampling/Monitoring Record Form (IWDF-Form-03).</p>	In compliance	<p>Monitoring personnel confirmed that groundwater monitoring equipment was tested by dipping in water and checking for signal prior to each monitoring round.</p>
5.5	<p>Monitoring Method</p> <p>At each prescribed monitoring location, the following shall be undertaken:</p> <ul style="list-style-type: none"> • The bore shall be dipped to determine if water is present. • Results shall be recorded on the Sampling/Monitoring Record Form (IWDF-Form-03). • If water is present: 	In Compliance	<p>Bores were dipped but water was not present. Results recorded on appropriate form. See Appendix V for groundwater monitoring records.</p>

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • The water level shall be measured and reported on the Sampling/Monitoring Record Form (IWDF-Form-03). • A water sample shall be taken (see below). • The bore shall be purged prior to sampling (using a bailer or pump) comprising the removal of a minimum of three bore volumes. <p>A water sample shall be taken using a disposable bailer or a bailer which has been decontaminated (using detergent and water) prior to use and then rinsed in fresh (ideally distilled) water. If a non-disposable bailer is used, equipment blank shall be taken (by sampling the distilled water passed through the cleaned bailer).</p> <p>The water sample(s) shall be placed in sample bottles appropriate for the proposed analyses (see below). At least one duplicate sample shall be taken and analysed.</p>		
5.6	<p>Health and Safety</p> <p>The appropriate PPE shall be worn while collecting any sample, dependent on the type of sample, type of potential contaminant, potential exposure pathways and location.</p> <p>The Safety Manager will indicate the appropriate PPE required, as referred to in the Operation Health & Safety Procedures (if relevant).</p> <p>Any PPE that comes into contact, or is suspected to have come into contact, with contaminated samples, must be thrown away or decontaminated by washing with soapy water and rinsing in fresh water.</p>	N/A	Interview and observation confirmed that appropriate PPE is always worn during site activities at the IWDF.
5.7	<p>Sample Storage and Transport</p>	N/A	No water was detected therefore no samples to be stored or transported. See

Section	Requirement	Status	Evidence / Comment
	<p>Samples should be stored appropriately, dependent on their type and proposed analysis. Water samples should be stored in a chilled esky and packaged for transport. Transport to the receiving laboratory should be arranged as soon as possible.</p>		Appendix V for groundwater monitoring records.
5.8	<p>Sample Analysis and Chain of Custody All samples shall be analysed by a laboratory that is NATA certified for the analyses required.</p> <p>A Chain of Custody Record (IWDF-Form-01), signed by the Environment Manager, will accompany the samples from the IWDF to the laboratory (probably in Perth) to be signed on receipt by laboratory personnel.</p> <p>Analysis must be undertaken within permitted holding times for the parameter being analysed (liaise with the laboratory to ensure these holding times are known).</p>	N/A	No samples collected. See Appendix V for groundwater monitoring records
5.9	<p>Water Sample Analysis The water samples shall be analysed for the component(s) specific to all wastes currently buried at the site, as summarised in IWDF-Form-21 Groundwater Analysis Register, which is held by the FMC Environment Manager.</p> <p>The water analyses shall be interpreted using the relevant values from the DWER Contaminated Site Assessment Criteria or as otherwise determined by the Environment Manager or Radiation Safety Officer, or in the Operation Environmental Procedures.</p> <p>If any components are detected above recognised background (or previous monitoring) concentrations, Finance shall be notified, and appropriate remedial action taken, as directed by the Environment Manager.</p>	N/A	No groundwater water was detected therefore no analysis required. See Appendix V for groundwater monitoring records

Section	Requirement	Status	Evidence / Comment
EI-02 Soil and Dust Environmental Sampling			
Purpose: Addresses the methods for sampling and analysis of soil and dust during disposal operations at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
EI-03 Capping Monitoring			
Purpose: Must be followed for the ongoing monitoring of capping at the IWDF.			
5.1	<p>Nomenclature and Recording Monitoring locations are to be recorded using standard nomenclature, such as: 2008RT01-L01-01 Where:</p> <ul style="list-style-type: none"> • The first set of numbers relate to the trench number or the activity. • The second set of numbers refers to the monitoring location which should be referenced on a map or diagram. • The last two numbers identify the photo or record number at that location. <p>Monitoring records are to be recorded using the Capping Monitoring Record Form (IWDF-Form-38b).</p>	In compliance	See Appendix Z for Capping Monitoring records.
5.2	<p>Monitoring Locations For every waste disposal trench, at least one location shall be identified around the trench. The precise location will depend on the size and nature of the capping.</p> <p>The locations will be selected and marked so that the same locations can be used for repeated monitoring.</p>	In compliance	See monitoring locations in Figure 4 of this PCR. Figure 4 was updated at the completion of the 2020NRT01 disposal to include monitoring locations for the new trench.

Section	Requirement	Status	Evidence / Comment
	The locations shall be recorded on a Monitoring Location Figure, which shall be updated as new locations are added.		
5.3	<p>Monitoring Schedule Monitoring shall be undertaken approximately once per year, or as otherwise directed by Finance, in accordance with Finance monitoring schedule(s). The FMC will undertake the monitoring.</p> <p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules.</p> <p>Successive monitoring events are to be recorded on a Monitoring Register (IWDF-Form-39).</p>	In compliance	See Appendix Z for Capping Monitoring records.
5.3.1	<p>Monitoring Method At each prescribed monitoring location, the following shall be undertaken:</p> <ul style="list-style-type: none"> • Photographs – to be taken from the same location, in the same direction, and of the same feature. • Written notes – visual observations of the integrity of the trench dome surface, to include the presence of: <ul style="list-style-type: none"> • Erosion channels • Subsidence. • Measurements – depths of channel erosion or subsidence features, if feasible. <p>The exact location of measurements should be recorded in photographs or sketches to allow comparison with subsequent measurements.</p>	In compliance	See Appendix Z for Capping Monitoring records.

Section	Requirement	Status	Evidence / Comment
5.3.2	<p>Monitoring Analysis and Actions Monitoring results and observations shall be compared with previous results to identify potential changes in the integrity of the capping.</p> <p>If erosion or subsidence of the capping is identified, the Operations Manager (having discussed the issue with the Engineering Manager) shall undertake repair works on the cap, as soon as practicable.</p>	In compliance	<p>Review of capping monitoring results demonstrated that some minor erosion has been detected but does not yet require repair work.</p> <p>See Appendix Z for Capping Monitoring records.</p>
EI-04 Rehabilitation Monitoring			
Purpose : Must be followed for the ongoing monitoring of rehabilitation at the IWDF.			
5.1	<p>Nomenclature and Recording Monitoring locations are to be recorded using standard nomenclature, such as: 2008RT01-L01-01. Where:</p> <ul style="list-style-type: none"> • The first set of numbers relate to the trench number or the activity. • The second set of numbers refers to the monitoring location which should be referenced on a map or diagram. • The last two numbers identify the photo or record number at that location. <p>Monitoring records are to be recorded using the Rehabilitation Monitoring Record Form (IWDF-Form-38a).</p>	In compliance	See Appendix N for rehabilitation monitoring records.

5.2	<p>Monitoring Locations</p> <p>For every waste disposal trench, approximately 2 locations shall be identified around the trench, one on each side of the trench.</p> <p>The precise location will depend on the size and nature of the trench and the extent of rehabilitated area.</p> <p>The locations will be selected so that the same locations can be used for repeated monitoring. The locations shall be recorded on a Monitoring Location Figure, which shall be updated as new locations are added.</p>	In compliance	See monitoring locations in Figure 4 of this PCR. Figure 4 was updated at the completion of the 2020NRT01 disposal to include monitoring locations for the new trench.
5.3	<p>Monitoring Schedule</p> <p>Monitoring shall be undertaken annually, ideally during spring months, in accordance with Finance monitoring schedule(s). The FMC will undertake the monitoring.</p> <p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules. Successive monitoring events are to be recorded by Finance on a Monitoring Register (IWDF-Form-39).</p> <p>A botanist shall inspect the rehabilitation at least every 10 years.</p>	In compliance	See Appendix N for rehabilitation monitoring records. Rehabilitation monitoring records 2014 to 2020 have been reviewed by a botanist who concluded that the rehabilitation is progressing well.
5.3.1	<p>Monitoring Method</p> <p>At each prescribed monitoring location, the following shall be undertaken:</p> <ul style="list-style-type: none"> • Photographs – to be taken from the same location, in the same direction, and of the same feature. • Written notes – visual observations of the extent of revegetation, such as: <ul style="list-style-type: none"> • Density of vegetation (% ground coverage). • Maximum height of vegetation. • Average height of vegetation. 	In compliance	See Appendix N for rehabilitation monitoring records.

	<ul style="list-style-type: none"> Species diversity. Presence of weeds. <p>The existing, fenced, disposal compounds shall remain clear of vegetation for the operational life of the site, to allow for monitoring of the integrity of the water shedding clay dome.</p> <p>Any vegetation found to be growing on the water shedding clay dome shall be removed.</p>		
5.3.2	<p>Monitoring Analysis and Actions</p> <p>Monitoring results and observations shall be compared with previous results to track the development of revegetation. Care should be taken to compare monitoring results with those of similar seasons (or consider seasonal changes).</p> <p>If revegetation does not appear to be progressing, the following may be undertaken:</p> <ul style="list-style-type: none"> Inspection of the rehabilitated areas by a botanist to identify potential issues and management strategies. A management strategy shall be implemented, such as reseeded. 	In compliance	Rehabilitation monitoring results 2014 to 2020 have been reviewed by a botanist who concluded that the rehabilitation is progressing well.

FMC Radiation Management Procedures

Section	Requirement	Status	Evidence / Comment
RP-01 Radiation Management			
Purpose: addresses the management of radioactive waste disposal at the IWDF.			
No radioactive waste disposal operation – this aspect not required.			

Section	Requirement	Status	Evidence / Comment
RI-01 Gamma Radiation Monitoring			
Purpose: Must be followed for the measurement of gamma radiation levels at the IWDF.			
5.1	<p>Monitoring Equipment & Calibration</p> <p>Gamma radiation levels are to be measured using an appropriately calibrated Environmental Monitor, equipped with a Geiger-Muller scintillator probe, which enables the aggregate count in one minute to be recorded.</p> <p>The RSO shall ensure that appropriate calibration records are obtained in accordance with FMC Management Procedure FMP-06 Control and Maintenance of Equipment.</p> <p>A copy of the current calibration certificate or letter of authorisation is to be included with all reports.</p>	N/A	<p>Gamma radiation monitoring was last completed September 2017. See 2017 – 2018 PCR for Gamma Radiation Monitoring Report.</p> <p>Gamma radiation monitoring is not due again until Sept / Oct 2022.</p>
5.2	<p>Monitoring Method</p> <p>The detector is to be fixed horizontally one metre above the ground level at each location point, 3 (three) one-minute counts are taken, and the aggregate counts recorded.</p>	N/A	
5.3	<p>Pre-Disposal Monitoring</p> <p>A one-off gamma radiation survey is to be conducted prior to the commencement of any earthworks associated with a disposal operation.</p> <p>Measurements are to be made on a grid over the proposed disposal area. The size of the grid should be such that a minimum of 25 location points is measured within the area.</p> <p>The location of each point measured is to be established by GPS, or equivalent.</p> <p>All the data are to be recorded within a table, or equivalent, showing both the locations and the aggregate counts.</p>	N/A	No disposal of radioactive waste occurred during audit period.

Section	Requirement	Status	Evidence / Comment
	<p>The mean aggregate counts in one minute are to be converted to micrograys per hour using the approved calibration factor for the radiation monitor.</p> <p>The report should specify the number of measurements, the range of gamma radiation levels (or more strictly the absorbed dose rates in air expressed as micrograys per hour), and the mean and standard deviation from the mean.</p>		
5.4	<p>Post-Disposal Monitoring</p> <p>A one-off gamma radiation survey is to be conducted after the completion of all earthworks associated with a radioactive waste disposal operation.</p> <p>Measurements are to be made at a representative number of location points within, and at the perimeter of, the disposal compound. The location of each point measured is to be established by GPS, or equivalent.</p> <p>Results shall be recorded on the Gamma Radiation Monitoring Form. The mean of 3 (three) one-minute counts are to be recorded at each location.</p> <p>All the data are to be shown in a table, or equivalent, showing both the locations and the mean aggregate counts.</p> <p>The mean aggregate counts in one minute are to be converted to micrograys per hour using the approved calibration factor for the radiation monitor.</p> <p>The report should specify the number of measurements, the range of gamma radiation levels (or more strictly the absorbed dose rates in air expressed as micrograys per hour), and the mean and standard deviation from the mean.</p>	N/A	No disposal of radioactive waste occurred during audit period.

Section	Requirement	Status	Evidence / Comment
5.5	<p>On-going Monitoring Gamma radiation surveys are to be conducted every five years, or associated with a burial operation involving radioactive waste, whichever is the shortest interval.</p> <p>Measurements are to be made at a representative number of location points within, and at the perimeter of, the disposal compound.</p> <p>The location of each point measured is to be established by GPS, or equivalent.</p> <p>Results shall be recorded on the Gamma Radiation Monitoring Form. The means of 3 (three) one-minute counts are to be recorded at each location.</p> <p>All the data are to be shown in a table, or equivalent, showing both the locations and the mean aggregate counts.</p> <p>The mean aggregate counts in one minute are to be converted to micrograys per hour using the approved calibration factor for the radiation monitor.</p> <p>The report should specify the number of measurements, the range of gamma radiation levels (or more strictly the absorbed dose rates in air expressed as micrograys per hour), and the mean and standard deviation from the mean.</p>	N/A	Gamma radiation monitoring completed September 2017. Monitoring due again in 2022.
6.	The RSO shall ensure that all monitoring records are filed in the IWDF Radiation Monitoring File maintained in his office as per FMC Management Procedure FMP-02 Record Management.	In compliance	All past radiation monitoring reports are included in the radiation monitoring folder of the IWDF Document Library.
7.	The RSO shall submit reports on the various monitoring programs to the FMC Project Manager and Finance Project Manager.	N/A	No radiation monitoring reports were required during audit period.

Section	Requirement	Status	Evidence / Comment
	Finance shall forward a copy of each radiation monitoring report to the RCWA.		
RI-02 Occupational Radiation Monitoring			
Purpose: Must be followed for the personal radiation monitoring of personnel involved with disposal operations at the IWDF involving radioactive items. Personal radiation monitoring is applicable to the acceptance, packaging, transportation, and burial phases of an operation.			
No radioactive disposal operation – this aspect not required			

FMC Safety Management Procedures

Section	Requirement	Status	Evidence / Comment
SP-01 Health and Safety Management and Planning			
Purpose: addresses the management and planning of health & safety during disposal operations at the IWDF.			
5.1	<p>Identification of Hazards (Aspects and Impacts) An Environmental & Health & Safety Aspects and Impacts Register shall be maintained and updated for general and waste-specific activities at the IWDF.</p> <p>This may comprise part of the general IWDF Aspects and Impacts Register.</p> <p>The register shall be developed using a risk assessment method developed for the IWDF, as outlined in Finance Management Procedure MP-01 Aspects and Impacts.</p> <p>The register shall be updated prior to each new disposal operation, to include waste-</p>	In compliance	Aspects and Impacts Register was reviewed Sep 2020 and May 2021 by FMC Project Manager.

Section	Requirement	Status	Evidence / Comment
	<p>specific aspects and impacts.</p> <p>The register shall be updated to include additional activities that may be planned as part of the ongoing management of the site.</p>		
5.2	<p>Operational Health & Safety Documentation</p> <p>The Health & Safety Aspects and Impacts Register shall be used to identify (and if necessary, update), health and safety management procedures, as outlined in the IWDF Safety Procedures (SPs) and associated Safety Instructions (SIs).</p> <p>A document summarising the Operation Health & Safety and Emergency Response Procedures (OHS&ERP) for the proposed disposal project shall be compiled by the FMC Systems Manager with input from the Health & Safety Manager and the RSO (if necessary).</p> <p>The scope of the OHS&ERP shall be in accordance with the Health & Safety and Emergency Response (Reporting) Guidelines.</p>	N/A	<p>Aspects and Impacts Register was reviewed Sep 2020 and May 2021 by FMC Project Manager.</p> <p>No disposal operation occurred during the reporting period.</p>
5.3	<p>Operational Health & Safety Planning</p> <p>The following health and safety planning activities shall be completed prior to commencement of site operation activities:</p> <ul style="list-style-type: none"> • Selection and purchase of applicable PPE (see Safety Instruction SI-02 Personal Protective Equipment). • Engagement of a site nurse/paramedic or senior first aid officer (see Safety Instruction SI-06 First Aid). <p>The following health and safety planning activities shall be completed prior to</p>	N/A	<p>No disposal operation occurred during the reporting period.</p> <p>See SI-02 Personal Protective Equipment.</p>

Section	Requirement	Status	Evidence / Comment
	commencement of any waste handling activities: <ul style="list-style-type: none"> • Development and approval of operation specific health & safety and emergency response procedures (see above). • Appointment of and liaison with medical practitioner (in accordance with WorkSafe requirements) regarding health surveillance and medical clearance for respirator use (see Safety Instruction SI-04 Occupational Monitoring). • Liaison with Radiation Safety Officer (if necessary) to determine radiation safety requirements (see Radiation Procedure RP-01 Radiation Management). • Selection and purchase of applicable PPE (see Safety Instruction SI-02 Personal Protective Equipment). 		
SP-02 Operation Site Safety Management			
Purpose: Addresses safety management at the IWDF site during disposal operations.			
Not required as no disposal operation occurred during the reporting period.			
SI-01 Excavation Safety			
Purpose: Addresses the management of excavation safety at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-02 Personal Protective Equipment			
Purpose: Addresses the requirements for personal protective equipment at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			

Section	Requirement	Status	Evidence / Comment
SI-03 Hygiene and Decontamination			
Purpose: Addresses the requirements for decontamination at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-04 Occupational Monitoring			
Purpose: Addresses the requirements for occupational monitoring and medical surveillance at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-05 Communications and Traffic Control			
Purpose: Addresses the requirements for communications and traffic control at the IWDF.			
5.1	<p>General Communications</p> <p>The IWDF 4WD vehicle is equipped with a portable satellite telephone and CB/UHF radio. Other communication on-site is by CB/UHF and portable radio.</p> <p>The portable radios must be capable of operating between the trench areas and the site accommodation area.</p> <p>Wherever possible, more than one person will be present at the site at any one time, and more than one person will undertake any isolated activity at the site.</p> <p>However, if an employee is isolated from other persons for a particular task, communication will be available in the form of a portable satellite telephone, CB/UHF radio</p>	In compliance	<p>Observation confirmed that:</p> <ul style="list-style-type: none"> • Portable satellite telephones and CB/UHF radios were in use. • The list of emergency contacts was displayed in the office and available in the site vehicles. <p>Review of Site Visit Records confirmed that there was always more than one person at the IWDF during monitoring events. See Appendix Y for Site Visit Records.</p>

Section	Requirement	Status	Evidence / Comment
	<p>or portable radio to enable the employee to call for help in the event of an emergency.</p> <p>Regular contact will be made between an isolated employee and either the Operations Manager or Safety Manager. An appropriate procedure (such as regular radio communication) will be established on a case-by-case basis by the Operations Manager or the Safety Manager and isolated worker, considering the proposed activity, proximity of the worker to the site and availability of communication systems.</p> <p>Site operations personnel will be in contact using portable radios. All persons expected to use the portable satellite telephone, CB/UHF radio and the portable radios will be trained in their use by the Operations Manager or Safety Manager.</p> <p>The list of Operation Emergency Contact numbers will be displayed next to the satellite phone in the office and the portable satellite telephone in the IWDF 4WD vehicle.</p> <p>The IWDF 4WD vehicle, with the satellite phone and CB/UHF radio, must be present on the site during general activities and at the operating trench during all waste disposal activities to enable emergency contacts to be alerted.</p>		
5.2	<p>Communication Protocol – Arrival/Departure</p> <p>All personnel (including visitors and contractors) are required to call the IWDF before departing the Great Eastern Highway turnoff to the site to advise on the anticipated time of arrival.</p> <p>Upon arrival, all persons must sign in the State Personnel and Visitor Logbook. Upon Departure, all persons must sign out in the State Personnel and Visitor Logbook.</p> <p>Similarly, personnel leaving the site are required to call the site when they have either left</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>the access road at the southern end or arrived at their destination. This is to safeguard against personnel being stranded on the ill-frequented access road following an accident or breakdown.</p> <p>The Operations Manager or the Safety Manager will instigate a search if personnel fail to arrive, or call from their destination, within one hour of the anticipated time.</p>		
5.3	<p>Access Road – Routine Vehicles</p> <p>The IWDF Access Road stretches from the Great Eastern Highway to the IWDF site for approximately 100 km. The road surface is unsealed and requires regular grading. The appointed road maintenance contractor is responsible for the grading and maintenance of the access road.</p> <p>Care in driving on the access road is required during wet weather as the surface may become slippery and soft. If the condition of the road is deemed to be unsafe at any time the Site Manager or Finance will close the road until deemed safe. Road closure will be indicated at entry to the road by a 'road closed' sign.</p> <p>Given the number of IWDF Access Road use agreements in place, traffic (vehicles and trucks) is now reasonably frequent along this road. The road is generally wide enough for overtaking/passing, but care should be taken in relation to speed, camber and bends in the road and other obstacles.</p>	N/A	General information.
5.4	<p>Access Road – Waste Trucks</p> <p>Personnel involved in the dispatch of trucks from the waste producer's storage location shall advise the Operations Manager at the site of the approximate arrival time of each</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>convoy.</p> <p>Notify other road users (permit/agreement) approx. 30 days in advance that waste will be transported on the road – providing approximate dates and length of time.</p> <p>The Operations Manager will then inform local mining operations (if they are operational) of the anticipated arrival time of the trucks at the southern end of the site access road.</p> <p>At or before this anticipated time, the Operations Manager will place a sign at the Mt Dimer turn-off, which will read, “Beware Trucks on Road” or “Caution Convoy”.</p> <p>Once the trucks have arrived at the southern end of the access road, the driver of the last truck will place a sign that reads, “Beware Trucks on Road”. Alternatively, the Operations Manager, or delegate, will place these signs prior to arrival of the trucks. These signs shall remain until the operation is completed.</p> <p>Truck drivers will be informed not to use the road in wet conditions. A large truck bay has been constructed at the southern end of the access road to allow up to five trucks to safely wait off the road, until weather and road conditions improve.</p> <p>Trucks carrying waste shall only travel on the access road during daylight hours (or as directed by the Operations Manager).</p>		
5.5	<p>Speed Limits A maximum speed limit of 40 km/h is set for the exclusion zone for all vehicles including heavy machinery. A maximum speed limit of 80 km/h is set for all other areas.</p> <p>Normal caution is appropriate at the site, especially near turn-offs and around buildings</p>	General information	Observation on site confirmed that appropriate speeds were used by vehicles moving from the camp to the trench disposal areas.

Section	Requirement	Status	Evidence / Comment
	<p>(where there are pedestrians).</p> <p>The speed limit for the site access road is 80 km/h, although road and weather conditions should be considered in establishing a safe speed, which may be specified by the Operations Manager.</p>		
5.6	<p>Side-tracks</p> <p>There are numerous narrow tracks in a network around the site that are not maintained. Driving on these tracks, while not prohibited, is discouraged. It is easy to get lost in the network and not being maintained, the tracks often contain stakes, which could puncture tyres.</p> <p>There is generally no requirement to use these tracks to operate at the site and use of these tracks should only be following specific permission of the Operations Manager.</p>	General information	
5.7	<p>Excavation Traffic Control</p> <p>Specific traffic control procedures may be required in the vicinity of the trench excavation area, which must be developed and communicated on an operation-specific basis.</p> <p>It is likely that visibility around the trench area may be impaired due to the presence of stockpiles of material. In such cases, a communication protocol shall be developed, for example using radio contact to announce the entry of every vehicle into the trench area.</p> <p>Visitors shall not be allowed to drive in the trench area, without the specific permission of the Operations Manager.</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
SI-06 First Aid			
Purpose: Addresses the requirements for first aid management at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-07 Heavy Machinery Operations			
Purpose: Addresses the requirements for heavy machinery operations at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-08 Exclusion Zones			
Purpose: Addresses the requirements for Exclusion Zones at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			

FMC Operation Emergency Response Procedures

Section	Requirement	Status	Evidence / Comment
ERP-01 Incident Prevention Reporting and Investigation			
Purpose: Addresses the management of incidents at the IWDF.			

Section	Requirement	Status	Evidence / Comment
5.2	<p>Avoidance of Incidents All site personnel shall endeavour to avoid the occurrence of incidents by:</p> <ul style="list-style-type: none"> • identifying, reporting, investigating, and recording all hazards and near misses; and • following relevant operational, environmental and safety procedures (OPs, EPs, SPs, ERPs). 		General information.
5.3	<p>Emergency Response Emergency Response Procedures shall be implemented for major incidents in accordance with Emergency Response Procedure ERP-02 Emergency Response Management.</p>	N/A	No major incidents occurred at the IWDF during the reporting period.
5.4	<p>Reporting & Notification of Near Misses, Accidents, and Incidents All near misses, accidents and incidents shall be reported by the identifier immediately (or as soon as practicable) to the Operations Manager or Safety Manager.</p> <p>All near misses, incidents or accidents shall be reported using a Near Miss/Accident/Incident Report (IWDF-Form-06) which shall be completed and registered (IWDF Form-07).</p> <p>Copies of all major incident/accident reports shall be forwarded to the FMC and Finance Project Managers within 24 hours (and as soon as practicable for major incidents). Appropriate authorities shall be notified in the event of major incidents (see specific ERI's).</p> <p>The Operations Manager shall contact relatives of any injured personnel, as required (using contact details given in the Medical Advice Form completed for the individual, if completed).</p> <p>The Operations Manager or any other FMC personnel shall not speak to the media</p>	In compliance	No major incidents occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	regarding the incident, without the express permission of the Finance Project Director.		
5.5	<p>Investigation All near misses and incidents shall be investigated by the Operations Manager and Safety Manager, as a minimum.</p> <p>Environmental incidents shall also be investigated by the Environment Manager (EP-09).</p> <p>The objectives of the investigation will be to:</p> <ul style="list-style-type: none"> • determine the existence of unforeseen hazards or contributing factors; • make recommendations for managing such hazards; • determine if any unsafe practice or condition was involved; • evaluate the adequacy of the existing safety management practices; • evaluate the effectiveness of the response implemented during the emergency; and • make recommendations for managing or eliminating unsafe conditions and for changes to procedures if warranted. <p>Major incidents shall be investigated by the FMC Project Manager, Operations Manager, Safety Manager, Environment Manager, if required, and waste owner health & safety personnel, as appropriate – the Investigation Team.</p> <p>The investigation procedure for a major incident shall be as follows:</p> <ol style="list-style-type: none"> 1. Those members of the Investigation Team present on site at the time of the incident or just after (e.g., the Operations Manager, Safety Manager) will seek to obtain facts about the incident quickly and accurately (but without detriment to the emergency response procedure); 2. The Operations Manager / Safety Manager will assess the hazards to others at the 	N/A	No major incidents occurred during the reporting period.

	<p>scene and, as appropriate, evacuate the area and/or seek professional assistance (e.g., fire brigade) to secure the premises and prevent further such occurrences;</p> <ol style="list-style-type: none"> 3. Those members of the Investigation Team who are not at the site at the time of the incident, but are required on site, will arrive at the scene as soon as possible and will be briefed by those members of the team already present; 4. Evidence at the scene of the incident will be preserved, except to the extent necessary to protect personnel and the environment, until the investigation is completed; 5. Statements will be recorded from all witnesses; 6. The injured person(s) will be interviewed as soon as possible; 7. Physical evidence of the incident will be taken in the form of photographs and measurements of the scene; 8. All other evidence relating to the incident will be recorded; 9. Recommendations will be made for: <ol style="list-style-type: none"> 1. the management and / or elimination of hazards / impacts relating to the incident; 2. changes in standard operating procedures; and 3. revision of training. <p>An accident investigation report will be compiled by the Safety Manager and will be submitted to Finance within 7 days of the emergency, or as agreed with Finance.</p> <p>The FMC Safety Manager shall also supply copies of the report to:</p> <ul style="list-style-type: none"> • any personnel directly involved/injured in the incident; and • FMC Project Manager and Operations Manager. <p>The Finance IWDF Project Manager shall provide a copy to WorkSafe Western Australia if notifiable injuries had been incurred (Occupational Safety and Health Regulations 1996, Section 2.4).</p>		
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Section	Requirement	Status	Evidence / Comment
ERP-02 Emergency Response Management			
Purpose: Addresses the management of emergency response at the IWDF.			
5.3	<p>IWDF 4WD Vehicle and Emergency Stretcher</p> <p>The IWDF 4 Wheel Drive (4WD) vehicle shall be equipped with satellite phone and UHF radio, first aid kit, emergency contact details and procedures and shall be capable of transporting the stretcher.</p> <p>This vehicle shall be maintained and kept on-site during all operations and in the vicinity of the active trench during all disposal operations.</p> <p>The stretcher will be stored in the trench office during all operations and in the storage shipping container at other times.</p> <p>In the event of absence or failure of the IWDF 4WD vehicle, an alternative vehicle will be used, equipped with at least a portable satellite phone, portable radio (preferably a UHF radio), first aid kit and emergency contact details. Preference should be given for a long-wheel base vehicle capable of transporting a stretcher if necessary.</p> <p>Communications must be maintained with the site office such that the alarm can be raised, and emergency services contacted from the site satellite phone. The limitations of the vehicle should be considered in relation to emergency procedures requiring evacuation of injured victims.</p> <p>The First Aid Officer will assess whether a victim may be transported in a vehicle for evacuation.</p>	In compliance	Observation confirmed that the IWDF 4WD vehicle was equipped with satellite phone and UHF radio, first aid kit, emergency contact details and procedures.

Section	Requirement	Status	Evidence / Comment
5.4	<p>Emergency Contact Details General (ongoing) Emergency Contact Details for the IWDF are provided in IWDF Emergency Contact Numbers document.</p> <p>Operation-specific contact details are compiled as part of the Operation Transport Procedures (OTP).</p> <p>The Department of Fire and Emergency Services (DFES) is designated as the Hazard Management Agency for hazardous materials emergencies in Western Australia. The DFES will be the first point of contact in the event of an emergency (e.g., fire) involving waste at the IWDF.</p> <p>The DFES is responsible for ensuring that all emergency management activities pertaining to the prevention of, preparedness for, response to and recovery from hazardous materials emergencies are undertaken.</p> <p>The HAZMAT Coordinating Committee comprises many agencies, both government and private (e.g., DFES, Police, DWER, and Ambulance services) and assists the DFES to coordinate the State's resources in the management of hazardous materials emergencies.</p>	N/A	No disposal operation occurred during the reporting period.
5.5	<p>Emergency Response Team An IWDF Emergency Response Team (ERT) shall respond to all incidents or emergencies at the IWDF site.</p> <p>The ERT shall comprise the Operations Manager, Safety Manager, First Aid Officer, Environment Manager, and the Contractor Supervisor, under the management of the</p>	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>Operations Manager (or the Safety Manager if the Operations Manager is unavailable).</p> <p>The Operations Manager shall ensure that:</p> <ul style="list-style-type: none"> • ERT members have received appropriate training. • ERT members have appropriate PPE (see SI-02 Personal Protective Equipment and OHS&ERP) and emergency equipment (IWDF-Form-42) on standby. <p>In the event of an incident during transport of waste to the IWDF, members of the ERT may be required to travel to the incident site, under the direction of the Operations Manager, in accordance with ERI-04 Transport Emergency Response.</p>		
5.6	<p>Muster Points and Accounting for Personnel</p> <p>Muster Points shall be defined and communicated to all site personnel during inductions, and during safety briefings (e.g., if the muster points change during operations).</p> <p>The Site Plan shall specify all muster locations.</p> <p>Upon mustering of personnel, the Operations Manager, Site Manager or Safety Manager, shall ensure that all personnel are accounted for, by checking the latest entries in the State Personnel and Visitor Logbook.</p>	In compliance	<p>Review of Site Plan included in the General Site Induction confirmed that the muster points were defined.</p> <p>Accounting for personnel was not required during audit / reporting period as no incidents occurred.</p>
5.7	<p>General Emergency Response Procedure</p> <p>A general Emergency Response Procedure shall be communicated to all personnel at the site, as outlined in the IWDF Emergency Response Procedure Information Sheet.</p> <p>This procedure must be posted around the site and personnel are required to familiarise themselves with these procedures.</p>	In compliance	<p>Observation and review confirmed that the general Emergency Response Procedure was included in the General Site induction package and is posted in the site office.</p>

Section	Requirement	Status	Evidence / Comment
5.8	<p>Specific Emergency Response Procedures There are three main types of specific emergency response procedure defined for the IWDF:</p> <ul style="list-style-type: none"> • injury and evacuation procedure; • waste incident emergency response procedure; and • fire response procedure. <p>Sheets summarising these procedures shall be posted around the site and shall be given to site personnel during their site inductions (Emergency Procedure Information Sheets).</p> <p>These emergency procedures are outlined in more detail in Emergency Response Instructions ERI-01, Injury and Evacuation Response, ERI-02 Waste Incident & Spill Response, and ERI-03 Fire Response.</p> <p>The Operations Manager, Safety Manager and Contractor Safety Supervisor shall be familiar with these procedures.</p>	In compliance	The General Site Induction package contained the required specific emergency response procedures and procedures were also posted in the site office.
5.9	<p>Communications & Notification Other members of the Project Team, family members (in the event of an accident) and authorities, shall be contacted in accordance with ERP-01 Incident Prevention, Reporting, and Investigation.</p>		See ERP-01 Incident Prevention, Reporting and Investigation.
5.10	<p>Emergency Debriefing After every emergency incident, a de-briefing session is to be held as soon as practicable and prior to recommencement of operations.</p> <p>The events leading to the incident, the impacts of the incident and the</p>	N/A	No emergency incidents occurred during audit period.

Section	Requirement	Status	Evidence / Comment
	corrective/preventive actions are to be discussed (as identified during the emergency investigation). The Operations Manager shall ensure that a record of the debriefing session is taken and filed.		
5.11	Resumption of Operations Site operations shall only resume when the Operations Manager is satisfied that: <ul style="list-style-type: none"> • The incident has been investigated and documented. • The cause of the incident has been rectified and that no residual risk remains in the incident area. • Further activity can proceed safely. • Approval has been given by the FMC Project Manager and the Finance Project Manager. • Approval has been given by WorkSafe (WA) if notifiable injuries have been incurred. 	N/A	No emergency incidents occurred during audit period.
ERI-01 Injury and Evacuation Response			
Purpose: must be followed in the event of a serious injury, which may require evacuation, at the IWDF.			
As there was no serious injury which required evacuation from the IWDF, this emergency response instruction was not audited.			
ERI-02 Waste Incident and Spill Response			
Purpose: This instruction must be followed in the event of any incident relating to chemical waste, radioactive waste, or other hazardous material, at the IWDF.			
As there was no incident relating to chemical waste or other hazardous material during the reporting period, compliance with this emergency response instruction was not audited.			

Section	Requirement	Status	Evidence / Comment
ERI-03 Fire Response			
Purpose: This instruction must be followed in the event of fire at the IWDF.			
As there was no fire event during the reporting period, compliance with this emergency response instruction was not audited.			
ERI-04 Transport Emergency Response			
Purpose: Must be followed in the event of an incident occurring during transport of waste to the IWDF.			
As there was no incident occurring during transport of waste to the IWDF, compliance with this emergency response instruction was not audited.			

4.3 IWDF Environmental, Health & Safety Management Program

4.3.1 Overview

The IWDF Environmental, Health and Safety Management Program provides the basis for the establishment and maintenance of effective management programs to achieve the standards, objectives, and targets for the IWDF, and to enable continual improvement in performance. The IWDF Environmental, Health and Safety Management Program is comprised of Management Plans and Action Plans.

4.3.2 Management Plans

These management plans are summary documents which have been developed to provide high level management goals, objectives, and targets for the following aspects of the IWDF's activities:

- Flora and fauna;
- Water;
- Air quality;
- Decommissioning and rehabilitation;
- Health and safety;
- Emergency response;
- Radiation;
- Transport:
- Waste acceptance;
- Community liaison; and
- Management review.

The management plans summarise the methods (i.e., procedures and operational controls) that are in place and must be maintained to achieve the on-going management goals, objectives, and targets, and hence sustain best practice operational performance.

4.3.3 Compliance Assessment

Table 8 summarises the level of compliance with each of the IWDF Management Plans for the reporting period. Management of the IWDF was compliant with all applicable requirements of the management plans during the reporting period.

Table 8
IWDF Management Plans Compliance Assessment for July 2020 to June 2021

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
1	Air Quality	Finance contractors will undertake inspections to ensure that waste is appropriately packaged, transported, and unloaded to prevent spillage or rupture.	N/A	No waste disposal occurred during reporting period.
		If a waste package ruptures, the waste material will be covered as soon as possible, and any spillage immediately contained and recovered.	N/A	No waste disposal occurred during reporting period.
		Appropriate personal protective equipment and safety measures will be utilised when necessary.	N/A	No waste disposal occurred during reporting period.
		Dust suppression techniques will be employed during earthworks.	N/A	No waste disposal occurred during reporting period.
		Dust monitoring shall be undertaken.	N/A	No waste disposal occurred during reporting period.
		Vehicles and machinery will be serviced regularly to ensure optimal efficiency	N/A	No waste disposal occurred during reporting period.
2a	Decommissioning and	Vegetation and topsoil cleared during operations is stockpiled nearby.	N/A	No waste disposal occurred during reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
	Rehabilitation -A Operation Specific and Ongoing	Cleared areas shall be rehabilitated using the stockpiled vegetation and topsoil following completion of their use (except for fenced disposal compounds and tracks used for access).	N/A	No waste disposal occurred during reporting period.
		Areas undergoing rehabilitation will be monitored annually and assessed by a botanist every ten years.	In compliance	See Appendix N for Rehabilitation Monitoring Records. Assessment by botanist next due September 2024.
		Upon completion of site works temporary infrastructure shall be removed.	N/A	No temporary infrastructure on site during reporting period.
		Disused tracks and road shall be allowed to revegetate naturally.	In compliance	Site inspection reports show that all disused tracks and roads have revegetated naturally.
2b	Decommissioning & Rehabilitation -B Long Term and Site Closure	A decommissioning statement will be prepared six months prior to decommissioning.	N/A	Not yet required as the IWDF remains operational.
3	Emergency Response	Develop and implement effective and appropriate emergency response procedures.	In compliance	ER procedures and work instructions have been developed for the IWDF and approved by the EPA. See page 28 of this PCR for list of ER procedures and work instructions.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Report thoroughly on all emergency or potential emergency incidents.	N/A	No emergency or potential emergency incidents occurred during reporting period.
		Investigate all incidents, accidents and near misses and implement corrective actions to prevent recurrence.	N/A	No emergency or potential emergency incidents occurred during reporting period.
		Provide all personnel with the appropriate equipment and training.	In compliance	General site inductions were completed for all visitors to the IWDF during the reporting period.
4	Flora and Fauna	Flora and fauna surveys shall be undertaken to identify species at the site.	In compliance	Fauna Assessment was completed in 2009 by Coffey Environments. See 2009 PCR for report. Botanical assessment was completed in 2014. See 2014 – 2015 PCR for report.
		Prior to any clearing, the conservation status of plants in that area will be determined and clearing avoided in areas containing priority species.	N/A	Not required during reporting period as no clearing occurred.
		A botanist shall be brought to site prior to significant clearing, where necessary.	N/A	Not required during reporting period as no clearing occurred.
		Unnecessary clearance or disturbance of vegetation shall be avoided	In compliance	No unnecessary clearing occurred during reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Fauna injuries and deaths will be treated as environmental incidents.	N/A	No environmental incidents were recorded during reporting period
		Drivers within the site shall be aware of native fauna.	In compliance	Native fauna awareness was included in the general site induction for all personnel visiting the IWDF during the reporting period.
		Trenches and boreholes shall be designed to prevent the trapping of fauna.	In compliance	Inspection confirmed all boreholes and trenches are capped to prevent fauna ingress.
		Dust suppression techniques shall be used during operations.	N/A	No waste disposal occurred during reporting period.
		Weed identification	In compliance	The weed management plan and identification kit were reviewed Oct 2020, but no changes were required. Botanical survey completed Oct 2014 reported that no weeds were sighted during this survey.
5	Health and Safety	To comply with Operation Health and Safety and Emergency Response Procedures.	In compliance	Where applicable – during site inspection visits.
		Maintain a Health & Safety Aspects and Impacts Register.	In compliance	The Aspects and Impacts Register was reviewed and updated Sept 2020 and May 2021.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Ensure Safety Data Sheets are readily available.	In compliance	SDS were reviewed and updated prior to Disposal Operation 2020NRT01 and are available in hardcopy at the IWDF site office and electronically in the IWDF Document Library.
		Report all incidents and near misses and implement corrective actions.	N/A	No incidents or near misses were reported for the reporting period.
		Ensure appropriate safety equipment is worn and maintained, and all personnel are adequately trained.	In compliance	All personnel visiting the IWDF completed the general site induction or abridged general site induction were always accompanied by IWDF personnel.
		Hold safety management briefings, as appropriate to activities.	N/A	No disposal operation occurred during the reporting period.
		To undertake regular site safety inspections and operation safety audits.	N/A	No disposal operation occurred during the reporting period.
6	Radiation	All radioactive wastes will be assessed against the Acceptance Criteria for Radioactive Wastes and be packaged and transported in the approved manner.	N/A	Although radioactive waste acceptance applications (proformas) were received during reporting period no radioactive waste was disposed. Waste acceptance applications received were assessed against the Safety Assessment and Safety Case for the IWDF.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		The Radiological Council shall approve the design and location of the disposal trench.	N/A	Not required as a radioactive disposal operation did not occur during reporting period.
		Radioactive waste will be placed in the trench in accordance with the RCWA Approvals and the position and activity of each drum recorded.	N/A	A radioactive disposal operation did not occur during reporting period
		A permanent marker shall be placed above all trenches containing radioactive waste	In compliance	Inspection confirmed that a permanent marker has been placed at each disposal cell.
		All personnel who come into proximity with radioactive waste shall attend an induction and wear personal radiation monitors.	N/A	A radioactive disposal operation did not occur during reporting period.
		Pre-disposal, ongoing and occupational radiation monitoring shall be undertaken.	N/A	A radioactive disposal operation did not occur, and ongoing monitoring not required during reporting period.
		Predisposal and post disposal environmental radiation monitoring.	N/A	Not required as a radioactive disposal operation did not occur during reporting period

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
7	Transport	Operation Transport Procedures (OTP) shall be developed for each operation, which provide details of transport and packaging, emergency preparedness, contractor responsibilities, procedures, communications, and emergency response recovery, and are submitted to the EPA.	N/A	No disposal operation occurred during the reporting period.
		Procedures for communications with the emergency response team, local community and emergency services shall be prepared and detailed in the OTP.	N/A	No disposal operation occurred during the reporting period.
		Waste shall be packaged, labelled, and transported in accordance with the OTP and applicable dangerous goods and radioactive legislation, and a Finance delegate will inspect prior to transport to ensure compliance.	N/A	No disposal operation occurred during the reporting period.
		Personnel involved in loading and transport of waste (including contractors) shall be briefed on the potential risks, emergency response and communication procedures.	N/A	No disposal operation occurred during the reporting period.
		Appropriate protective clothing and equipment shall be used.	N/A	No disposal operation occurred during the reporting period.
		Emergency Response Team (ERT) members shall be appropriately trained and equipped.	N/A	No disposal operation occurred during the reporting period.
		Shipping documentation, OTP and emergency information shall be kept in the transport vehicle.	N/A	No disposal operation occurred during the reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
8	Water	Operations will not be planned for the wet season.	N/A	No disposal operation occurred during the reporting period.
		Regular weather reports will be obtained during waste disposal periods and site activities scheduled to avoid waste acceptance and burial activities during rainfall.	N/A	No disposal operation occurred during the reporting period.
		The trench and drainage systems will be designed and positioned to avoid the infiltration of surface water and potential groundwater effects.	N/A	No disposal operation occurred during the reporting period.
		When heavy rainfall is expected, temporary berms and V drains will be constructed and any waste in the open trench covered with compacted sand and gravel.	N/A	No disposal operation occurred during the reporting period.
		Groundwater monitoring shall be undertaken regularly.	In compliance	Groundwater monitoring was undertaken in Oct 2020, and April 2021 – see Appendix V for groundwater monitoring records.
		Water which accumulates in the trench, will be allowed to dry in situ, or if suspected to be contaminated, removed, and analysed.	N/A	No disposal operation occurred during the reporting period.
9	Waste Acceptance	Ensure all waste owners wishing to dispose of waste at the IWDF provide adequate details of the wastes, in accordance with Operation Environmental & Waste Acceptance Guidelines.	In compliance.	All waste acceptance applications received were reviewed by the FMC/RSO for completeness before an assessment of

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
				the waste against the waste acceptance criteria was undertaken.
		Assess a waste owner's waste details against the waste acceptance criteria.	In compliance	All complete waste disposal applications were assessed against the IWDF waste acceptance criteria, safety assessment, and safety case and a report for each application was provided to Finance for actioning.
		Provide details of the wastes in the Operation Environmental and Waste Acceptance Environmental procedures submitted to the EPA.	N/A	No disposal operation occurred during the reporting period.
		Undertake inspections of the waste.	In compliance	Review of waste assessments confirmed that, where applicable, waste was inspected by the FMC or RSO and photographs included in the assessment report. No disposal operation occurred during the reporting period.
10	Community Liaison	Maintain a public database which provides details of all waste disposed at the IWDF. This shall be accessible through the Finance office in Perth.	In compliance	This database was updated in Sept 2020 to detail the waste disposed during the Disposal Operation 2020NRT01. See Appendix L for extract detailing 2020NRT01.
		Respond efficiently to complaints and undertake appropriate corrective actions.	N/A	No complaints were received during 2020 – 2021 reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		An archiving schedule and record retention table are maintained to ensure that documents are archived to allow future generations access to the information.		Finance has in place a Retention and Disposal schedule which includes all appropriate IWDF records. This R&D schedule was approved by the State Records Commission in March 2014. See Appendix H.
		A community liaison committee, containing members of the community meets at least 4 times per year to raise community concerns, review important documents and provide input into operational decision-making.	In compliance	CLC Meetings were held 24 Oct 2020, 8 Dec 2020, 1 Apr 2021, and 10 June 2021. See Appendix M for minutes. Jun 21 minutes have not been included as they are not yet endorsed by the CLC.
11	Review of Management	Undertake regular audits of the management system.	In compliance	The management system was audited during reporting period – see tables 6 & 7 of this PCR for audit tables.
		Hold management review meetings twice yearly.	In compliance	Management Review Meetings were held 24 Nov 2020 and 03 Jun 2021. See Appendix R for minutes.
		Undertake disposal operation audit of operational procedures.	In compliance	See tables 6 and 7 of this PCR.
		Produce an annual performance and compliance report and provide to EPA and RCWA for review.	In compliance	This PCR.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Correct any non-conformances as soon as possible and ensure corrective/preventative actions are in place.	N/A	No non-conformances were recorded for the reporting period.
		Regularly review the situation regarding current disposal practices and the awareness of international best practices and advances in technology.	In compliance	<p>Current disposal practices and the awareness of international best practices and advances in technology is formally reviewed twice annually and new documents are added to the document library where applicable. Ongoing review of best practice results in review / updates to processes and procedures whenever new information is made available via the many notification tools and list serves used.</p> <p>Results are reported at the Management Review Meetings. See Appendix R for minutes.</p>
		Liaise regularly with national and international waste management regulators.	In compliance	<p>Liaison with IAEA, UK, Europe and USA facilities and regulators occurred during reporting period.</p> <p>Results are reported at the Management Review Meetings. See Appendix R for minutes.</p>

4.3.4 Ongoing Suitability of Management Plans

The 2013 Technical Audit completed by representatives of ARPANSA recommended (recommendations 15 and 16) that in future the suitability of the Management Plans be assessed against the objectives as described in Sections 3.2.4 and 3.2.5 of the *Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia (1992)* as well as the currently documented compliance status as described above.

The recommendation required the assessment of suitability to be documented in the annual PCR. The PCR is then to be provided to the Radiological Council who may choose to make the PCR publicly available.

The *Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia (1992)* describes the purpose of the management plans as documents that set out management objectives and practices which will provide for the safe and environmentally sound management of the facility during its construction, operational and post-operational stages.

The IWDF has in place two comprehensive management systems (Finance & FMC) that were developed to meet the functional requirements of International Standards:

- ISO 9001 – Quality
- ISO 14001 Environmental
- ISO 45001 Safety.

All three standards have the following principles as their basis:

- a. Process and system methodology;
- b. Integration of quality, safety and environmental requirements into the functions and processes;
- c. Direction established through planning, policy, objectives and targets;
- d. Commitment and involvement by all and especially senior management;
- e. Provision of “fit for purpose” resources and competent staff;
- f. Identification of risk and elimination or minimisation of these risks;
- g. Compliance and risk management;
- h. Communication and consultation;
- i. Documented system;
- j. Monitor, measure, audit, review;
- k. Responsibilities and accountabilities;
- l. Intervention when things go wrong and implementation of corrective and preventative action; and
- m. Continuous Improvement.

The approach, structure, and content of the IWDF Management Systems were approved by the EPA and where relevant the RCWA prior to implementation. The IWDF processes and documentation were also developed to meet the objectives as described in the *Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia (1992)*.

Continuous improvement is achieved by implementing processes as follows:

- Constant current awareness, monitoring, and review of international advances in technology and current best practices for near surface disposal of hazardous and low-level radioactive wastes – this information is regularly discussed at project meetings, management team meetings and is included, where applicable, in operational documentation such as management plans, the IWDF aspects and impacts register, operational and ongoing management procedures.
- Monitoring and review of legislation, regulations, standards, and guidelines applicable to or that may impact near surface disposal of hazardous and low-level radioactive wastes - this information is regularly discussed at project meetings, management team meetings and is included, where applicable, in operational documentation such as management plans, IWDF aspects and impacts register, operational and ongoing management procedures.

Regular review, update, and modification of all IWDF processes and documentation informed by the knowledge obtained from the above activities and compliance auditing of such requirements ensures that all IWDF processes and documentation such as management plans continue to meet the objectives as described in the *Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia (1992)*.

The ongoing suitability of the IWDF Management Plans and other system documents is discussed at the Management Review Meetings. See Appendix R for Management Review meeting minutes.

4.3.5 Action Plans

The Action Plans describe Finance's specific improvement objectives, both long and short term, which demonstrate continual improvement in performance and provide quantitative targets, timeframes, and personnel for achieving these objectives. Progress against each action in the Actions Plans is updated monthly and is a standing agenda item at the monthly management meetings.

The Action Plans for the 2020 - 2021 reporting period are included as Appendix S.

4.4 Safety Assessment and Safety Case

Work has been completed on a draft safety assessment and operations safety case for the IWDF. The draft safety assessment and the operations safety case were submitted to the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in December 2016 for third party review.

ARPANSA provided feedback on the draft safety assessment on 15 October 2020. A high-level response to the review was prepared and provided to the RCWA, on 8

December 2020, for comment. Comment had not been received by the end of the reporting period.

4.5 Third Party Audit of Compliance with the Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia (1992)

Section 4.3 o) of the *Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)* (NH&MRC, 1993) requires the proponent/operator to “recommend to the appropriate authority a technical auditor as required under this code”. Section 4.5 states that the independent technical auditor shall “... review all the actions of the proponent/operator required by this code and provide publicly available reports to the appropriate authority ...”

The *Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)* (NH&MRC, 1993) requires that a review of all the actions of the proponent/operator required by this code be undertaken annually. In April 1999, the RCWA agreed to extend the frequency of external auditing from one to five years. ARPANSA has previously completed the required technical compliance audits in 2008 and 2013.

In 2018, the Department of Finance engaged ARPANSA to undertake the required technical audit for the IWDF.

This audit was undertaken 22 – 24 October 2018 and consisted of a visit to the IWDF, interviews with relevant personnel and review of documents supplied to the auditors. The requirements audited were only those relevant to or relating to the proponent’s/operator’s responsibilities for an operational facility and do not deal with the appropriate authority’s responsibilities or the requirements for siting, design, or construction of such a facility.

The technical compliance audit report (Final) was received from ARPANSA 9 June 2021.

The report recorded two noncompliances and made five recommendations. The noncompliances and recommendations, as extracted from the audit report, are provided below:

Noncompliances

NC 1. Dose constraints shall be applied to the waste disposal system to ensure that individual dose limits are not exceeded. Such constraints shall apply where individuals may be exposed to other potential, or actual, sources of radiation, excluding natural background or medical sources (relates to paragraph 2.2 of RHS 35). (*This noncompliance only applies to a dose constraint for the public as a dose constraint has already been implemented for workers.*)

A public dose constraint was included in IWDF Occupational Radiation Monitoring Instruction RI-02 in January 2020. Public dose monitoring procedures have been implemented and the results will be reported in the next PCR.

NC 2. Each disposal structure shall be accurately located and surveyed. Appropriate permanent surface and below-ground markers shall be put in place to define the boundaries and locations of disposal structures (relates to paragraph 3.1f.) of RHS 35). *(This only applies to below-ground markers as surface markers are in place and disposal locations have been recorded.)*

It should be noted that below ground markers may no longer be a requirement under the 2018 Code for Disposal of Solid Radioactive Waste (RPS C-3) therefore, the use of below ground markers for future radioactive disposals would be discussed with RCWA.

Recommendations

R1. Consider and document, particularly with regard to long-term safety, the appropriateness of the emplacement of both chemical and radioactive waste in the same trenches.

R2. Consider and document the role performed by the fencing around the disposal cells and identify the need to continue to monitor the condition and effectiveness of the fencing.

R3. The previous safety assessment documents should be compiled, reviewed, and revised to create the basis of a new safety assessment that is further developed to comply with current best practice in the field of near-surface radioactive waste disposal; taking into account modern best practices in radioactive waste management (e.g., IAEA SSG-23). Specifically, this should include:

- a. The development of a post-closure safety assessment, using site specific data and scenarios, the results of which are integrated into the existing safety case (this relates to paragraph 2.3 of RHS 35).
- b. Re-assess possible post-closure exposure scenarios due to the Facility and consider the possibility of potential sources of exposure not considered when deriving the generic activity concentration limits given in RHS 35 (this relates to paragraph 2.6.3 of RHS 35). These should be used to assess potential doses due to the facility, which can subsequently be used to inform activity concentration limits for the Facility.
- c. Re-examine the limit (or lack thereof) on the total radionuclide activity for the disposal facility by performing a quantitative evaluation of exposures that might result from the analysis of scenarios during the post-closure phase (e.g., leaching and dispersal of radioactive contaminants by groundwater) (this relates to paragraph 2.6.4 of RHS 35).

-
- d. Review whether a dose constraint for members of the public should be applied. It is acknowledged that there is currently no public population nearby. However, should demographics change in the future it may be useful to have such a dose constraint in place (this relates to paragraph 2.2 of RHS 35).
 - e. Re-evaluate whether doses predicted due to post-closure exposure scenarios are acceptable at timeframes consistent with the current institutional control period (ICP) or whether the ICP needs to be reconsidered (this relates to paragraph 2.3 of RHS 35).
 - f. Consider preparing documentation, if not already in existence, analysing the behaviour of the cement matrix with regard to:
 - i. Its ability to maintain its structure under compressive loads and possible structural changes in the waste body; and
 - ii. Its ability to comply with stability requirements and protect against inadvertent intrusion (this relates to paragraph 2.6.5 of RHS 35).
 - g. Consider including an analysis of the engineered barriers in the waste body and the disposal facility and the role they play in achieving the safety objective in the post-closure safety assessment. This can be used to decide upon appropriate monitoring actions during operation and post-closure of the Facility (this relates to paragraph 3.1(c) of RHS 35).
 - h. As part of the post-closure safety assessment, the design of the disposal trench is considered. Specifically, whether engineered drainage should be used for future disposal trenches (this relates to paragraph 3.1(h) of RHS 35).
 - i. It is recommended that an assessment of possible exposure pathways be undertaken. This can result from a post-closure safety assessment and be used to decide upon appropriate monitoring actions during operation and post-closure of the Facility (this relates to paragraph 3.2.4 of RHS 35).

R4. Consideration of whether appropriate below-ground warning markers should be put in place to help prevent inadvertent access to the waste forms (this relates to paragraph 3.1f) of RHS 35). *See Noncompliance 2.*

R5. Consider putting further effort into the database recording details of the radioactive materials disposed at the site. The database should aim to be complete and an authoritative record of disposal campaigns. It could explicitly include the category of radioactive waste (i.e., A, B or C) for each drum (this relates to paragraph 4.6.1(a) of RHS 35).

The new IWDF Waste Inventory Database was completed December 2020. The category of radioactive waste (A, B or C) was included as a separate field in the Waste Inventory Database and all radioactive items have been allocated the appropriate category. Therefore, the requirements of Recommendation R5 have been addressed.

A complete copy of the audit report is included at Appendix BB

5. ENVIRONMENTAL MONITORING RESULTS

Environmental monitoring is a fundamental component of both waste disposal operations and ongoing management at the IWDF. Groundwater, capping, radiation, and rehabilitation monitoring is undertaken irrespective of whether disposal operations are planned or undertaken, whereas other environmental monitoring such as some radiation monitoring, dust monitoring and soil sampling are undertaken on an operation-specific basis. The groundwater, trench capping and rehabilitation monitoring locations are shown on Figure 4.

5.1 Rehabilitation Monitoring

Rehabilitation monitoring occurs annually and involves recording the percentage coverage of vegetation in the rehabilitated areas around each disposal cell, maximum and average height of the plants, and the number of plant types. Photographs are taken at specific locations during each monitoring event for comparison and review (Figure 4).

The October 2020 rehabilitation monitoring showed good vegetation growth. No plant deaths were recorded other than where clearing of trench drains had impacted some vegetation adjacent to the drains.

The issue of continuing to monitor what is fully rehabilitated vegetation around the pre 2000 disposal cells was discussed at the November 2020 Management Review Meeting. A vegetation survey completed, in October 2014, verified that the rehabilitated vegetation around the pre 2000 disposal cells was indistinguishable from the surrounding vegetation.

It was agreed that no further monitoring of the vegetation around the pre 2000 disposal cells should occur. Procedure documents and monitoring forms have been updated to reflect this change.

See Appendix N for rehabilitation monitoring records.

5.2 Disposal Dome (Capping) Monitoring

Monitoring of the disposal domes (the water shedding clay caps which overlie each disposal cell) also occurs annually and involves the recording of any erosion channels on the domes (number and depth) and any subsidence features (number and depth).

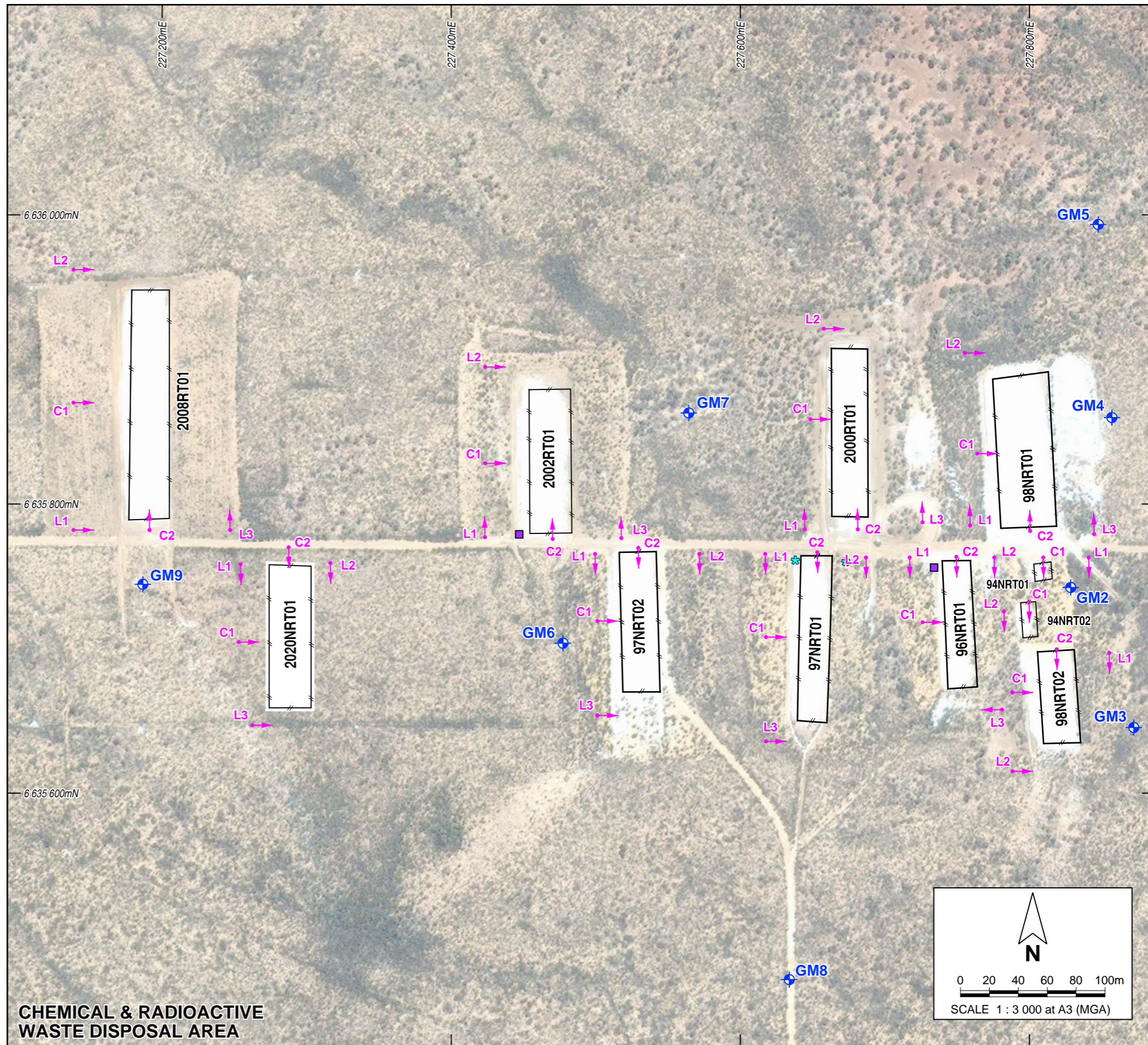
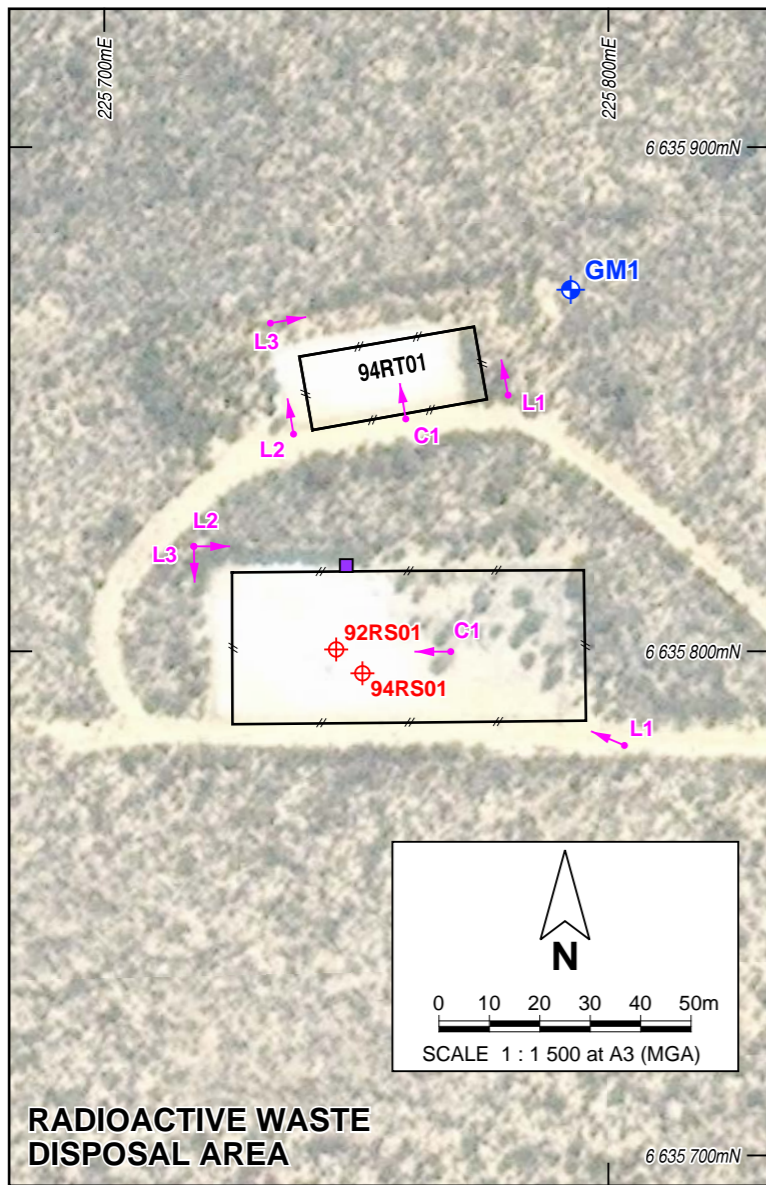
The most recent capping monitoring was completed in October 2020. It was found that the very minor erosion in the capping of the 2000RT01 disposal cell remains unchanged from the previous monitoring event and the capping on the new 2020NRT01 trench has bedded down well.

See Appendix Z for capping monitoring report.

5.3 Groundwater Monitoring

Groundwater monitoring was completed in October 2020 and April 2021. There has been no groundwater detected on the site since the first bore was installed and as a result water quality cannot be tested. Ongoing six-monthly groundwater monitoring, undertaken since 2000, has shown that no groundwater has been found in any of the monitoring bores present at the site.

The October 2020, and April 2021 groundwater monitoring records are provided in Appendix V.



Legend

- Fence
- 2008RT01** Trench or Shaft ID
- Location of Groundwater Monitoring Bore
- Location of Radioactive Waste Shaft
- Photograph Location and Direction
- C3** Trench Capping Photograph Location ID
- L3** Rehabilitation Photograph Location ID
- Location of Calytrix creswellii P3
- Location of Lepidosperma sp

NOTE: Photograph Location IDs are used in conjunction with Trench IDs.



Government of **Western Australia**
Department of **Finance**

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA

**GROUNDWATER, TRENCH CAPPING &
REHABILITATION MONITORING LOCATIONS**

Drawn: M. Shepherd

Date: 30 Aug 2020

Figure 4

Job: DF12020-001

APPENDICES

APPENDIX A

Ministerial Statement 562



Statement No.

000562

MINISTER FOR THE ENVIRONMENT;
LABOUR RELATIONS

STATEMENT TO AMEND CONDITIONS APPLYING TO PROPOSALS
(PURSUANT TO THE PROVISIONS OF SECTION 46 OF THE
ENVIRONMENTAL PROTECTION ACT 1986)

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, SHIRE OF COOLGARDIE

- Proposals:** (1) Integrated Waste Disposal Facility, Eastern Goldfields,
(Assessment No. 168); and
- (2) Disposal by Shaft Entombment or Trench Burial of a
Range of Intractable Wastes at the Intractable Waste
Disposal Facility, Mt Walton East, Shire of Coolgardie
(Assessment No. 823).
- Proponent:** Waste Management (WA)
- Proponent Address:** Level 8, 141 St George's Terrace, PERTH WA 6000
- Assessment Number:** 1286
- Previous Assessment Numbers:** 168, 168-1, 823, 1127
- Previous Statement Numbers:** Statement No. 044 published on 26 October 1988
Statement No. 205 published on 8 January 1992
Statement No. 353 published on 28 April 1994
Statement No. 533 published on 19 January 2000

Report of the Environmental Protection Authority: Bulletin 1005

Previous Reports of the Environmental Protection Authority: Bulletins 353, 572, 726 and
954

The implementation of the proposals to which the above reports of the Environmental Protection Authority relate is now subject to the following consolidated environmental conditions and procedures which replace all previous conditions and procedures:

1 Implementation

- 1-1 Subject to these conditions and procedures, the proponent shall implement the proposals as documented in schedule 1 of this statement.

Published on

01 FEB 2001

- 1-2 Where the proponent seeks to change any aspect of the proposals as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the Environmental Protection Authority, is substantial, the proponent shall refer the matter to the Environmental Protection Authority.
- 1-3 Where the proponent seeks to change any aspect of the proposals as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the Environmental Protection Authority, is not substantial, those changes may be effected.

2 Proponent Commitments

- 2-1 The proponent shall implement the environmental management commitments of 25 October 2000 as documented in schedule 2 of this statement.
- 2-2 The proponent shall implement subsequent environmental management commitments which the proponent makes as part of the fulfillment of conditions and procedures in this statement.

3 Proponent

- 3-1 The proponent for the time being nominated by the Minister for the Environment under section 38(6) or (7) of the Environmental Protection Act 1986 is responsible for the implementation of the proposals until such time as the Minister for the Environment has exercised the Minister's power under section 38(7) of the Act to revoke the nomination of that proponent and nominate another person in respect of the proposals.
- 3-2 Any request for the exercise of that power of the Minister referred to in condition 3-1 shall be accompanied by a copy of this statement endorsed with an undertaking by the proposed replacement proponent to carry out the proposals in accordance with the conditions and procedures set out in the statement.
- 3-3 The proponent shall notify the Environmental Protection Authority of any change of proponent contact name and address within 30 days of such change.

4 Commencement

- 4-1 The proponent shall provide evidence to the Minister for the Environment within five years of the date of this statement that the proposals have been substantially commenced.
- 4-2 Where the proposals have not been substantially commenced within five years of the date of this statement, the approvals to implement the proposals as granted in this statement shall lapse and be void. The Minister for the Environment will determine any question as to whether the proposals have been substantially commenced.

- 4-3 The proponent shall make application to the Minister for the Environment for any extension of approval for the substantial commencement of the proposals beyond five years from the date of this statement at least six months prior to the expiration of the five year period referred to in conditions 4-1 and 4-2.
- 4-4 Where the proponent demonstrates to the requirements of the Minister for the Environment on advice of the Environmental Protection Authority that the environmental parameters of the proposals have not changed significantly, then the Minister may grant an extension not exceeding five years for the substantial commencement of the proposals.

5 Compliance Auditing

- 5-1 The proponent shall submit periodic Compliance Reports, in accordance with an audit program prepared in consultation between the proponent and the Environmental Protection Authority.
- 5-2 Unless otherwise specified, the Environmental Protection Authority is responsible for assessing compliance with the conditions, procedures and commitments contained in this statement and for issuing formal written advice that the requirements have been met.
- 5-3 Where compliance with any condition, procedure or commitment is in dispute, the matter will be determined by the Minister for the Environment.


CHERYL EDWARDES (Mrs) MLA
MINISTER FOR THE ENVIRONMENT

01 FEB 2001

Schedule 1

Summary of key proposal characteristics (1286) .

Element	Description
Location	Approximately 125 km north-west of Kalgoorlie-Boulder in the Shire of Coolgardie
Area	25 square kilometres
Purpose	For the disposal of intractable wastes for which there is no other practical method of disposal.
Potential waste	Restricted to those that meet the waste acceptance criteria
Disposal method	Burial by shaft entombment or trench, capped with water-shedding dome.
Environmental Management	<p>Environmental Management Plans as listed below:</p> <ul style="list-style-type: none"> • flora and fauna; • water; • air quality; • decommissioning and rehabilitation; • health and safety; • emergency response; • radiation; • transport. <p>Procedures for each disposal operation developed consistent with Operational Guidelines as listed below:</p> <ul style="list-style-type: none"> • environmental; • health and safety and emergency response; • radiation; • transport.
Reporting	Long term monitoring and operational monitoring to be addressed in Environmental Management Plans.

Note: The incinerator component of the original proposal (assessment no. 168) will not proceed and has been removed from the description of the proposal.

Figure

Figure 1: Site Location (attached)

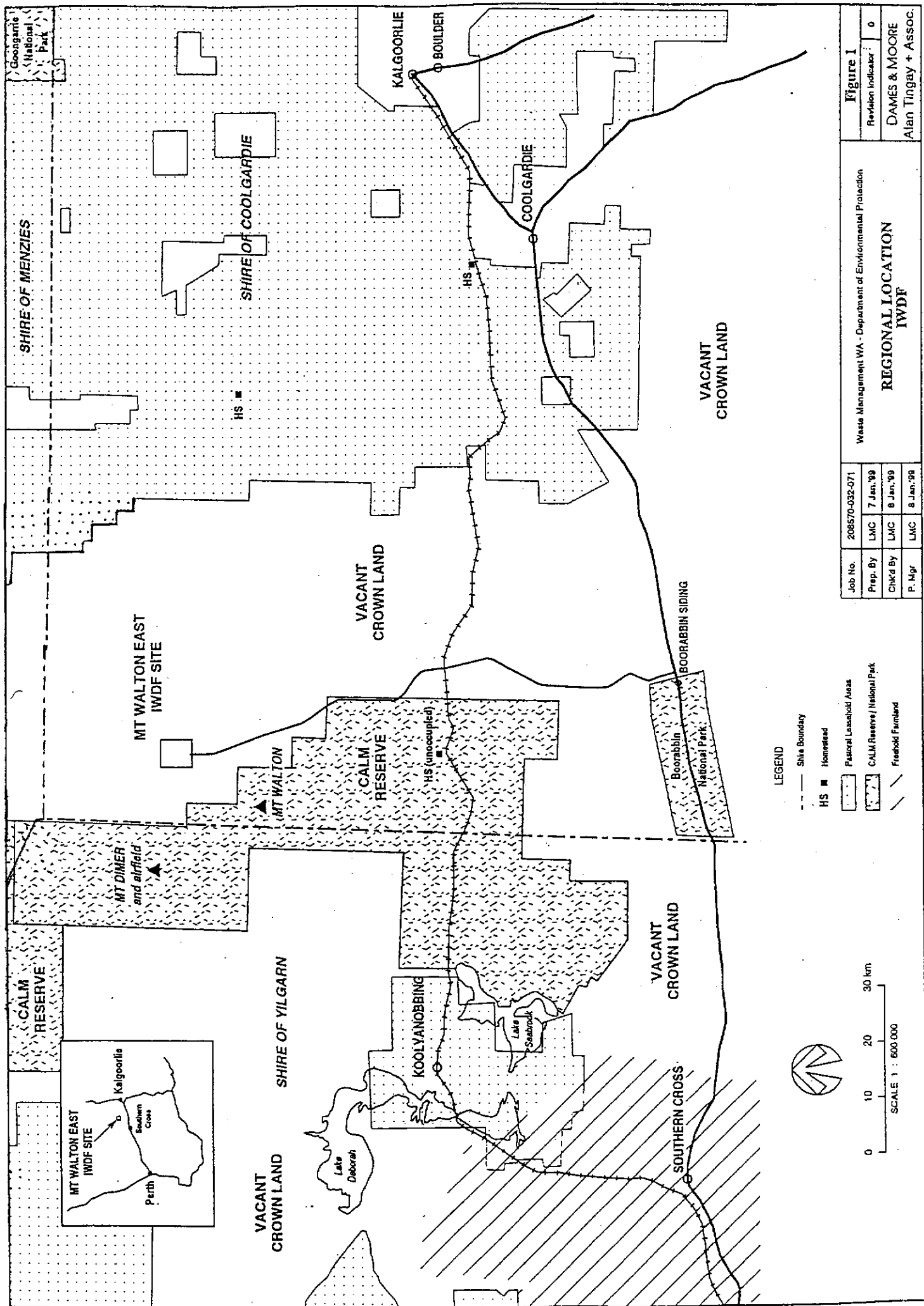


Figure 1. Site location.

**Proponent's Consolidated Environmental Management
Commitments**

25 October 2000

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, SHIRE OF COOLGARDIE (Two proposals)
(Assessment No. 1286)**

Waste Management (WA)

(The Health Department of Western Australia was formerly the proponent.)

Schedule 2 - Proponent's Consolidated Environmental Management Commitments of 25 October 2000
(Assessment No. 1286)

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
1	Environmental Management System	<p>(1.1) Demonstrate that there is in place an Environmental Management System that includes the following elements:</p> <ul style="list-style-type: none"> (a) an environmental, health and safety policy and corporate commitment to it; (b) mechanisms and processes to ensure: <ul style="list-style-type: none"> • Planning to meet environmental, health and safety requirements; • Implementation and operation of actions to meet environmental, health and safety requirements; • Measurement and evaluation of environmental, health and safety performance; and (c) review and improvements of environmental, health and safety outcomes. <p>(1.2) Implement the Environmental Management System required by commitment 1.1.</p>	<p>To effectively and comprehensively manage all matters relating to environmental protection and to fulfil the requirements of the conditions, procedures and commitments for the proposal.</p>	<p>Prior to the next disposal operation.</p>	<p>Environmental Protection Authority</p>		<p>Completed Environmental Management System</p>
			<p>To effectively and comprehensively manage all matters relating to environmental protection and to fulfil the requirements of the conditions, procedures and commitments for the proposal.</p>	<p>Prior to the next disposal operation</p>	<p>Environmental Protection Authority</p>		<p>Performance and Compliance Report</p>

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA
2	Environmental Management Program	(2.1) Prepare an Environmental Management Program.	To include but not be limited to the following: <ul style="list-style-type: none"> • environmental management plans (see commitment 3); and • operational guidelines (see commitment 4). 	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Program
		(2.2) Advertise and make the approved Environmental Management Program required by commitment 2.1 publicly available.	To inform the community.	Prior to the next disposal operation.	Environmental Protection Authority		Performance and Compliance Report
		(2.3) Implement the Environmental Management Program required by commitment 2.1.	To ensure that requirements specified in the approved Environmental Management Program are adhered to.	During all disposal operations.	Environmental Protection Authority		Performance and Compliance Report
3	Environmental Management Plans Flora and Fauna	(3.1) Prepare a Flora and Fauna Management Plan.	To ensure that the abundance, species diversity, geographic distribution and productivity of vegetation communities and terrestrial fauna are maintained by monitoring against existing baseline survey data.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
	Transport Management Plan	<p>(3.2) Prepare a Transport Management Plan that describes the general principles of managing the transportation of wastes to the Intractable Waste Disposal Facility. The plan will include but not limited to:</p> <ul style="list-style-type: none"> • emergency preparedness; • contractor responsibilities; • procedures; • communications; and • emergency response recovery. 	<p>To ensure that risk to the community, waste owners, contractors, employees, personnel and members of the emergency response services, property and the environment is minimised.</p>	<p>Prior to the next disposal operation.</p>	<p>Environmental Protection Authority</p>		<p>Approved Environmental Management Plan</p>
	Water Management Plan	<p>(3.3) Prepare a Water Management Plan.</p>	<p>To detail procedures and strategies to monitor:</p> <ul style="list-style-type: none"> • for the presence of groundwater and if groundwater is present, groundwater will be analysed to determine whether it has been contaminated by leachate from disposed waste; and • surface water to ensure that if surface water is likely to run off the site it will be analysed to determine whether it has been contaminated if there has been a spillage of waste. • If contamination has occurred, a contingency plan that forms part of the Water Management Plan will be implemented. 	<p>Prior to the next disposal operation.</p>	<p>Environmental Protection Authority</p>		<p>Approved Environmental Management Plan</p>

No.	TOPIC	ACTION	OBJECTIVES/	TIMING	TO REQUIRE- MENTS OF	ADVICE	MEASURE- MENT/ COMPLIANCE CRITERIA
	Emergency Response Plan	(3.4) Prepare an Emergency Response Management Plan.	To ensure that in the case of an incident at the Intractable Waste Disposal Facility: <ul style="list-style-type: none"> • all practicable measures are taken to ensure the welfare and amenity of the community; and • the environment is not adversely affected. 	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Health and Safety Management Plan	(3.5) Prepare a Health and Safety Management Plan. The Plan will include but not limited to: <ul style="list-style-type: none"> • procedures for training; and • procedures for monitoring. 	To ensure that all practicable measures are taken to safeguard the welfare and amenity of personnel and the community at the Intractable Waste Disposal Facility.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Air Quality Management Plan	(3.6) Prepare an Air Quality Management Plan.	To detail monitoring procedures and strategies to suppress dust and odour adequately to ensure that dust and odour emissions do not adversely affect the environment, or health, welfare and amenity of personnel at the Intractable Waste Disposal Facility.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Radiation Management Plan	(3.7) Prepare a Radiation Management Plan which will include but not be limited to: <ul style="list-style-type: none"> • environmental radiation monitoring; • periodic reporting to the Environmental Protection Authority and Radiological Council (Western Australia); • procedures for compliance with the Code of Practice for the Near-surface Disposal of Radioactive Waste in Australia (1992); • personnel radiation monitoring; and • reporting of the monitoring results to the Community Liaison Committee. 	To detail procedures and strategies to ensure that risk of exposure to radiation is kept within public health standards and as low as reasonably achievable for the community, waste owners, contractors, employees, personnel and members of emergency response services, and the environment.	Prior to the next disposal operation.	Environmental Protection Authority	Radiological Council (WA)	Approved Environmental Management Plan

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASURE-MENT / COMPLIANCE CRITERIA
	Decommissioning and Rehabilitation Management Plan	<p>(3.8) Prepare a Decommissioning and Rehabilitation Management Plan to include but not be limited to:</p> <ul style="list-style-type: none"> • removal or, if appropriate, retention of infrastructure; • rehabilitation of all disturbed areas to a standard suitable for agreed future land use/s; and • identification of disposal areas, including provision of evidence of notification to relevant statutory authorities. 	To ensure that the proposal is decommissioned and rehabilitated to a standard suitable for the future landuse/s.	At least six months before decommissioning.	Environmental Protection Authority	Radio-logical Council (WA)	Approved Environmental Management Plan
		<p>(3.9) Make the draft Environmental Management Plans required by commitment 3.1 to 3.8 available for a four week limited stakeholder review to the:</p> <ul style="list-style-type: none"> • IWDF Community Liaison Committee; • The Chamber of Minerals and Energy of Western Australia; and • Chamber of Commerce and Industry of Western Australia; <p>prior to the Environmental Protection Authority finalising its consideration of the Plans.</p>	To obtain stakeholder input to the Environmental Management Plans.	Prior to the next disposal operation. (Note: commitment 3.8 requires stakeholder review at least 6 months prior to decommissioning.)	Environmental Protection Authority		Approved Environmental Management Plan
		<p>(3.10) Advertise and make the approved Environmental Management Plans required by commitments 3.1 to 3.8 publicly available.</p>	To inform the community.	Prior to the next disposal operation. (Note: commitment 3.8 requires advertising and making publicly available at least 6 months prior to decommissioning.)	Environmental Protection Authority		Performance and Compliance Report

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
		(3.1) Implement the Environmental Management Plans required by commitments 3.1 to 3.8.	To ensure that requirements specified in the approved Environmental Management Plans are adhered to.	During each disposal operation. (Note: commitment 3.8 requires implementation at least 6 months prior to decommissioning.)	Environmental Protection Authority		Performance and Compliance Report
4	<u>Operational Guidelines</u> Waste Acceptance Environmental Safety / Emergency Response Transport Radiation	(4.1) Prepare the Waste Acceptance Operational Guidelines. (4.2) Prepare the Environmental Operational Guidelines. (4.3) Prepare the Safety/Emergency Response Operational Guidelines. (4.4) Prepare the Transport Operational Guidelines. (4.5) Prepare the Radiation Operational Guidelines.	All relevant Operational Guidelines are to be used as a guide to the proponent for the preparation of the Operational Procedures for each particular disposal operation (see commitments 5.1 and 5.2). The Operational Guidelines give guidance to the proponent on the means for achieving environmental outcomes required by a particular waste disposal operation.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Operational Guidelines

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
		(4.6) Make the draft Operational Guidelines required by commitments 4.1 to 4.5 available for a four week limited stakeholder review to the: <ul style="list-style-type: none"> • IWDF Community Liaison Committee; • The Chamber of Minerals and Energy of Western Australia; and • Chamber of Commerce and Industry of Western Australia; prior to the Environmental Protection Authority finalising its consideration of the Plan. (4.7) Advertise and make the approved Operational Guidelines required by commitments 4.1 to 4.5 publicly available.	To obtain stakeholder input to the Operational Guidelines.	Prior to the next disposal operation.	Environmental Protection Authority	Radio-logical Council (WA)	Approved Operational Guidelines
		(4.8) Implement the Operational Guidelines required by commitments 4.1 to 4.5.	To inform the community.	Prior to the next disposal operation.	Environmental Protection Authority		Performance and Compliance Report
		(5.1) Prepare the Environmental, Radiation, Health and Safety Operational Procedures in accordance with the Operational Guidelines.	To ensure that requirements specified in the approved Operational Guidelines are adhered to.	Prior to the next disposal operation.	Environmental Protection Authority		Performance and Compliance Report
5	<u>Operational Procedures</u> Environmental, Radiation, Health and Safety		To ensure that risk to the community, waste owners, contractors, employees, personnel and members of the emergency response services, and the environment is minimised.	Prior to each disposal operation.	Environmental Protection Authority	Radio-logical Council (WA)	Approved Operational Procedures

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
	Transport	<p>(5.2) Prepare the Transport Operational Procedures in accordance with the Operational Guidelines to include but not limited to:</p> <ul style="list-style-type: none"> • details of waste loading and transport activities, and emergency response training for personnel; • identification of responsibility for the various aspects of transport, loading and unloading operations; • contingency plans for dealing with fire safety, accidents, spillages, vehicle breakdowns and other incidents should they occur; and • the procedure for liaison with the local community and emergency services. <p>(The Operational Procedures documents referred to in commitments 5.1 and 5.2 will be the detailed working documents specific to each waste disposal operation).</p>	<p>To achieve environmental outcomes required by the Environmental Management Program in the conduct of a particular waste disposal operation (see commitment 2).</p>	<p>Prior to each disposal operation</p>	<p>Environmental Protection Authority</p>		<p>Performance and Compliance Report</p>
		<p>(5.3) Advertise and make the approved Operational Procedures required by commitments 5.1 and 5.2 publicly available.</p>	<p>To inform the community.</p>	<p>Prior to each disposal operation.</p>	<p>Environmental Protection Authority</p>		<p>Performance and Compliance Report</p>

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA
		(5.4) Implement the Operational Procedures required by commitments 5.1 and 5.2.	To minimise the possibility of a waste disposal operation adversely affecting the environment.	During each particular waste disposal operation.	Environmental Protection Authority (Should any incident occur during each particular waste disposal operation it is to be reported immediately to the EPA)		Performance and Compliance Report
6	<u>Performance and Compliance Report</u>	(6.1) Prepare the Performance and Compliance Report at the conclusion of each waste disposal operation. (6.2) Advertise and make the approved Performance and Compliance Report required by commitment 6.1 publicly available.	To outline the project outcomes and the environmental monitoring, and discuss adverse environmental impacts, if any and how these environmental impacts have been or will be managed. The process will provide feedback for continuous improvement to the Environmental Management Program. To inform the public.	Within three months following completion of each specific waste disposal operation.	Environmental Protection Authority	Radio-logical Council (WA) in relation to radiation issues	Approved Performance and Compliance Report
7	<u>Waste</u>	(7.1) Limit disposal of waste at the Intractable Waste Disposal Facility to waste generated in Western Australia (see commitment 4.1).	To comply with State Government requirements.	Within 4 weeks of obtaining approval for the Performance and Compliance Report. Prior to each disposal operation.	Environmental Protection Authority		Approved Performance and Compliance Report Environmental, Radiation, Health and Safety Operational Procedures

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIRE- MENTS OF	ADVICE	MEASURE- MENT/ COMPLIANCE CRITERIA
		(7.2) Ensure that approval to dispose of any specific waste is conditional on a review of currently practicably available waste treatment, disposal or management alternatives in Australia (see commitment 4.1).	To ensure that only wastes for which there is no currently practicably available destruction, disposal or management technologies in Australia are disposed of at the site and to maintain the site as a facility of last resort.	Prior to each disposal operation.	Environmental Protection Authority		Environmental, Radiation, Health and Safety Operational Procedures
		(7.3) Prepare a waste register data base to be maintained, updated and made publicly available at the office of the proponent or on the World Wide Web.	To show the method of disposal, source, type, quantity and location of all waste disposed of at the Intractable Waste Disposal Facility to enable future land users to take account of the deposited wastes and protect future users from adverse impacts on health and amenity.	Prepare the waste register data base within six months of the issuing of the Minister's Statement that the proposal may be implemented and update the register within three months of completion of each disposal operation.	Environmental Protection Authority		Performance and Compliance Report
8	Community Liaison	Convening a minimum of four meetings a year of the Community Liaison Committee.	To ensure that the community remains informed of activities at the Intractable Waste Disposal Facility.	Following the Minister's Statement that the proposal may be implemented.	Environmental Protection Authority		Performance and Compliance Report
9	Fencing and Signposting	Fence and signpost each discrete disposal cell.	To discourage access by: <ul style="list-style-type: none"> • fauna; • unauthorised personnel; and • the public. 	Prior to demobilisation of each waste disposal operation following the Minister's Statement that the proposal may be implemented.	Environmental Protection Authority		Performance and Compliance Report

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
10	Water	Demonstrate that there are at least 5 metres of clay between the base of any disposal cell and bedrock.	To allow for the possible establishment of a groundwater table in the future without impinging upon the disposal cells.	Prior to each disposal operation.	Environmental Protection Authority		Performance and Compliance Report
11	Transport and Packaging	Where transport and packaging is to be undertaken by a party other than the proponent, the proponent will ensure that the packaging and transport requirements specified in the Operational Transport Guidelines and Waste Acceptance Guidelines are adhered to through the use of contracts and other controls as necessary (see commitments 4.1 and 4.4).	To ensure that risk to the community, waste owners, contractors, employees, personnel and members of the emergency response services, property and the environment is minimised.	Prior to the commencement of transportation activities during each disposal operation.	Environmental Protection Authority		Approved operational Transport Procedures
12	Decommissioning and Rehabilitation	Implement the requirements of the Decommissioning and Rehabilitation Management Plan until the Minister for the Environment determines that decommissioning and/or rehabilitation is/are complete.	To ensure that the proposal is decommissioned and rehabilitated according to the requirements specified in the approved Decommissioning and Rehabilitation Management Plan (refer commitment 3).	During decommissioning and/or rehabilitation.	Minister for the Environment		Determination by the Minister for the Environment that decommissioning and/or rehabilitation is/are complete.

APPENDIX B

RCWA Registration

RADIATION SAFETY ACT 1975
CERTIFICATE OF REGISTRATION* OF PREMISES
in which
RADIOACTIVE SUBSTANCES
are to be used, stored or manufactured

It is hereby certified that the premises referred to in this certificate have been registered under the Radiation Safety Act 1975 for the radioactive substances and purpose(s) specified below. The registration* is subject to all applicable regulations under the Act and to any conditions, restrictions or limitations that are specified below or in any attachments.

1. **Name and address of the registrant**
MS EMMA SAVAGE-JONES
DIRECTOR, BUILDING MANAGEMENT
DEPARTMENT OF FINANCE
LOCKED BAG 44
CLOISTERS SQUARE W A 6850

DEPARTMENT OF FINANCE
RECORDS

24 FEB 2020

2. **Location of premises subject to registration***
IWDF, MT WALTON EAST, CROWN RESERVE 42001, ~100 KM NORTH OF GT EASTERN HWY BOORABBIN W A 6429

3. **Particulars of the radioactive substances to be used, stored, manufactured or otherwise dealt with on the premises**
(See Note a). These particulars, where applicable, are given on attached supplementary sheet(s)

4. **Approved radiation safety officer(s).** (The registrant must appoint the person(s) named below in writing and inform them in writing of their duties and responsibilities. See also Note b).
PARR MR STUART RADIOACTIVE SUBSTANCES -

5. **Conditions, restrictions or limitations** (See Note c) Cond 114
SEE ATTACHED CONDITIONS


6. **Purpose(s) applied to the registration***
DISPOSAL OF RADIOACTIVE WASTE - INTRACTABLE WASTE DISPOSAL FACILITY (IWDF), MT WALTON EAST

Notes

- a) **Prior notice in writing** must be given to the Radiological Council of material changes. This includes changes affecting the type, form, maximum activity, use or purpose of the radioactive substances as well as any proposed changes to the structure, ventilation or drainage which may differ from information previously supplied and on which approval for this registration may be based. Failure to provide proper notification is an offence under section 38 of the Act.
- b) Although the radiation safety officer has specified duties in the regulations, the registrant is responsible for ensuring that those duties are performed and that the use, storage or manufacture of the radioactive substances complies with the Act and regulations. Failure to do so is an offence.
- c) **The registrant must ensure compliance** with any conditions imposed on this registration under section 36 of the Act. A requirement may be imposed for the **conditions to be displayed** in a location accessible to all radiation workers.

10 FEB 2020

Date


Secretary, Radiological Council

This Certificate is not valid until signed by the Secretary of the Radiological Council.

REGISTRATION* NO: RS 13/2011 20590

EXPIRY DATE: 08 Feb 2023

RADIATION SAFETY ACT**CONDITIONS, RESTRICTIONS AND LIMITATIONS (SECTION 36)****DISPOSAL OF RADIOACTIVE WASTE AT THE
INTRACTABLE WASTE DISPOSAL FACILITY (IWDF), CROWN RESERVE 42001**

1. This Registration is for the disposal of radioactive waste at the Intractable Waste Disposal Facility (IWDF), Crown Reserve 42001 in accordance with the *Radiation Safety Act 1975 (Section 28)*.
2. The Registrant is directed to ensure that –
 - 2.1 prior to radioactive waste being accepted for final disposal at the IWDF, a disposal permit must be granted by the Radiological Council in accordance with *Section 34 of the Act*;
 - 2.2 disposals are undertaken in accordance with the *Radiation Safety (General) Regulations (1983)* and *Regulation 31(A) Near-surface disposal of radioactive waste*, as amended;
 - 2.3 radiation safety management is undertaken by the appointed *Radiation Safety Officer (RSO)*, in accordance with his duties under *Regulations 19(3)*;
 - 2.4 all radioactive waste to be disposed of at the IWDF shall be conditioned in accordance with the *Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)*, *Radiation Health Series No. 35*, *National Health and Medical Research Council of Australia 1992*;
 - 2.5 all radioactive waste to be packaged and transported to the IWDF shall be in accordance with the *Radiation Safety (Transport of Radioactive Substances) Regulations 2002* and the *Code of Practice for the Safe Transport of Radioactive Material (2008)* as adopted;
 - 2.6 the *Radiation Safety Officer (RSO)* reports periodically in writing to the Radiological Council, the results of radiation monitoring and other factors relating to human health for the receipt, handling and near-surface disposal of the radioactive waste; and if there are any changes to the radiation safety management procedures for the IWDF;
 - 2.7 accurate records of all radioactive material disposed of at the IWDF shall be maintained and archived in an approved manner, and reported to the Radiological Council, including an updated report after each disposal campaign;

2.8 where appropriate, radiation safety is managed in accordance with the following IWDF guidelines, procedures and instructions –

- 2.8.1 *Disposal of Radioactive Waste at the Intractable Waste Disposal Facility (IWDF), Mt Walton East, Waste Acceptance Guideline and Waste Acceptance Proforma, Government of Western Australia Department of Finance Building Management and Works, as amended;*
- 2.8.2 *IWDF Radiation Procedure RP-01, Radiation Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;*
- 2.8.3 *IWDF Operational Procedure OP-04, Waste Preparation for Disposal, Government of Western Australia Department of Finance Building Management and Works, as amended;*
- 2.8.4 *IWDF Operational Procedure OP-05, Waste Loading and Transport, Government of Western Australia Department of Finance Building Management and Works, as amended;*
- 2.8.5 *IWDF Operational Procedure OP-06, Waste Delivery, Acceptance and Disposal, Department of Finance, Building Management and Works, as amended;*
- 2.8.6 *IWDF Operational Procedure OP-10, Operation Site Safety Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;*
- 2.8.7 *IWDF Operational Instruction OI-01, Waste Inspection, Government of Western Australia Department of Finance Building Management and Works, as amended.*

CONDITION NO: 114
CERTIFICATE NO: RS 13/2011 20590
EXPIRES ON: 08 February 2023

RADIATION SAFETY ACT

CONDITIONS, RESTRICTIONS AND LIMITATIONS (SECTION 36)

SPECIAL CONDITIONS

- 1. Inventory locations of material at Intractable Waste Disposal Facility (IWDF), Mt Walton East, are outlined as follows -**
 - 92RS01: Final report on disposal of low level radioactive waste at the IWDF east of Mt Walton. Environmental Health Branch**
 - 92RS02: Disposal of second batch of radioactive waste at the IWDF, Mt Walton. Katee Enterprises, July 1994**
 - 94RT01: Radiological aspects of the acceptance and burial of CSBP & Farmers Ltd radioactive waste at Mt Walton East. Katee Enterprises, July 1994**
 - 2000RT01: 1999 Annual Radiation Report: Operations of the IWDF Mt Walton East. WM(WA), June 2000**
 - 2002RT01: 2002 Annual Radiation Report: Operations of the IWDF Mt Walton East. WM(WA)**
 - Report EP2008-154: Performance and Compliance Report: Intractable Waste Disposal Facility Mt Walton East, Coffey Environments, December 2008**

- 2. The full inventory of items buried at the IWDF is to be available on a database maintained by the Registrant.**

CERTIFICATE NO:

RS 13/2011 20590

EXPIRES ON:

08 February 2023

APPENDIX C

Department of Environment Regulation Licence



LICENCE FOR PRESCRIBED PREMISES

Environmental Protection Act 1986, Part V

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

LICENSEE AND OCCUPIER

Department of Finance
Building Management and Works
Optima Centre, 16 Parkland Road
OSBORNE PARK WA 6017

ABN: 995 933 47728

PREMISES

Intractable Waste Disposal Facility Mt Walton East
Crown Reserve No. 42001, approximately 100 km north of Great Eastern Highway
BOORABBIN, WA, 6429
(as depicted in attachment 1)

PRESCRIBED PREMISES CATEGORY

Schedule 1 of the *Environmental Protection Regulations 1987*

CATEGORY	DESCRIPTION	CAPACITY
66	Class V intractable landfill site.	Not applicable

CONDITIONS OF LICENCE

Subject to the conditions of licence set out in the attached pages.

Date signed: 11 February 2016

Steve Checker
MANAGER LICENSING (WASTE INDUSTRIES)
Officer delegated under Section 20
of the *Environmental Protection Act 1986*

ISSUE DATE Thursday, 14 February 2008
COMMENCEMENT DATE Monday, 18 February 2008
EXPIRY DATE Friday, 17 February 2017
AMENDMENT DATE Thursday, 11 February 2016

Page 1 of 7

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

DEFINITIONS

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means;

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au

REPORTING CONDITIONS

- 1 The licensee shall by **1 March** in each year, provide to the CEO an Annual Audit Compliance Report in the form in Attachment 3 to this licence, signed and certified in the manner required by Section C of the form, indicating the extent to which the licensee has complied with the conditions of this licence, and any previous licence issued under Part V of the Act for the premises, during the period beginning 1 February the previous year and ending on 31 January in that year.

NOTIFICATION OF INTENTION TO DISPOSE

- 2 The licensee shall notify the CEO in writing at least 3 months prior to the delivery of waste to the Intractable Waste Disposal Facility Mt Walton East.

CONDITIONS OF LICENCE

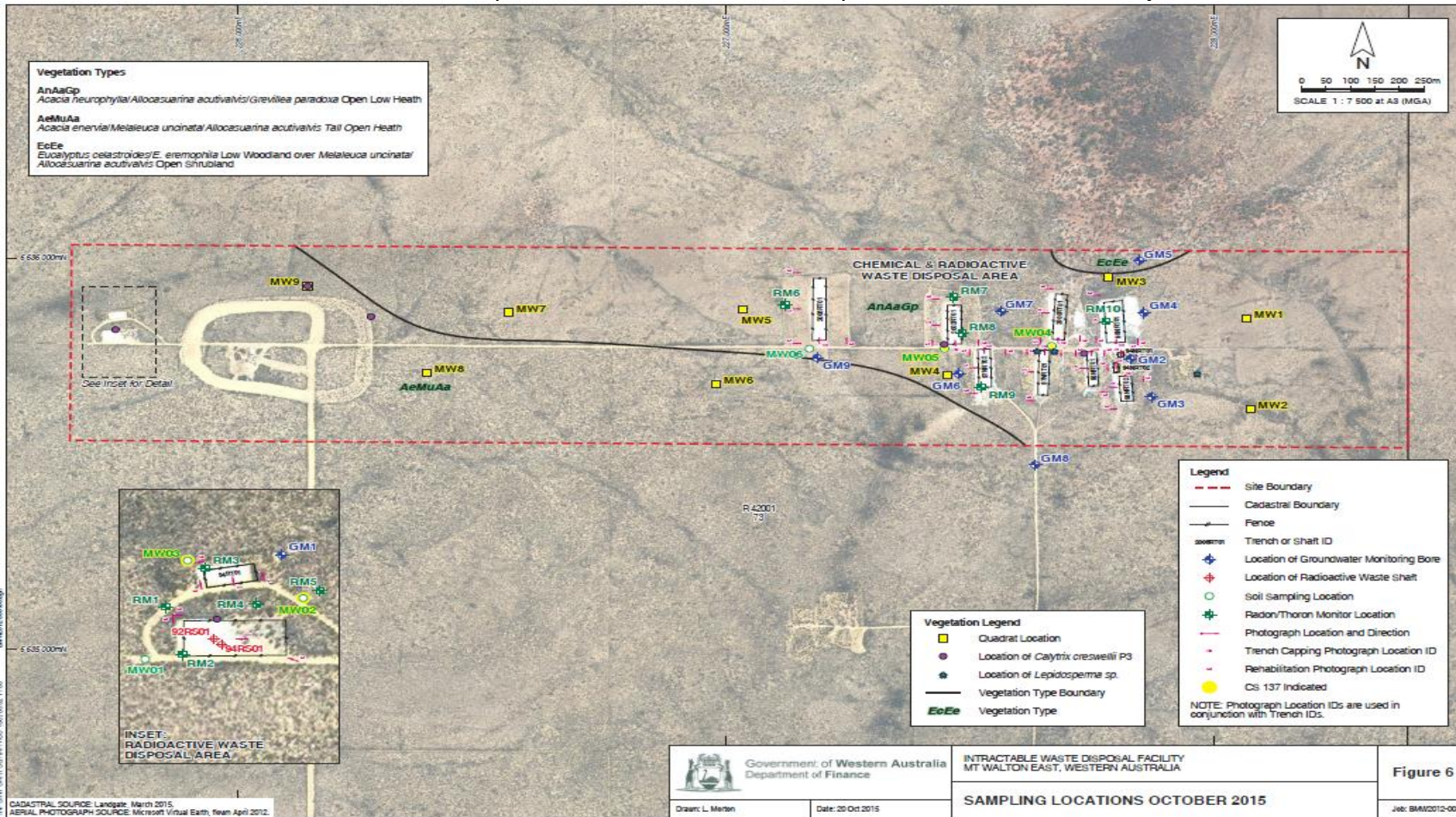
Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

Attachment 1 – Premises map

The Premises is shown in the map below. The red dotted line depicts the Premises boundary.



ISSUE DATE Thursday, 14 February 2008

Page 3 of 7

AMENDMENT DATE Thursday, 11 February 2016

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

ATTACHMENT 3: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

SECTION A - LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name: Department of Finance	ABN: 995 933 47728
Trading as:	
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of licence complied with within the reporting period? (please tick the appropriate box)
- Yes Please proceed to Section C
No Please proceed to Section B

Each page must be initialed by the person(s) who signs Section C of this annual audit compliance report

INITIAL: _____

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

SECTION B - DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each licence condition that was not complied with.

a) Licence condition not complied with?	
b) Date(s) when the non-compliance occurred, if applicable?	
c) Was this non-compliance reported to DER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____	<input type="checkbox"/> No
<input type="checkbox"/> Reported to DER in writing Date _____	
d) Has DER taken, or finalised any action in relation to the non-compliance?	
e) Summary of particulars of non-compliance, and what was the environmental impact?	
f) If relevant, the precise location where the non-compliance occurred (attach map or diagram)	
g) Cause of non-compliance	
h) Action taken or that will be taken to mitigate any adverse effects of the non-compliance	
i) Action taken or that will be taken to prevent recurrence of the non-compliance	

Each page must be initialed by the person(s) who signs Section C of this annual audit compliance report

INITIAL: _____

ISSUE DATE

Thursday, 14 February 2008

Page 6 of 7

AMENDMENT DATE

Thursday, 11 February 2016

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

SECTION C - SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is	The Annual Audit Compliance Report must be signed and certified:
an individual	<input type="checkbox"/> by the individual licence holder, or <input type="checkbox"/> by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> by the principal executive officer of the licensee; or <input type="checkbox"/> by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> by affixing the common seal of the licensee in accordance with the Corporations Act 2001; or <input type="checkbox"/> by two directors of the licensee; or <input type="checkbox"/> by a director and a company secretary of the licensee, or <input type="checkbox"/> if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or <input type="checkbox"/> by the principal executive officer of the licensee; or <input type="checkbox"/> by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> by the principal executive officer of the licensee; or <input type="checkbox"/> by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> by the chief executive officer of the licensee; or <input type="checkbox"/> by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____

SIGNATURE: _____

NAME: (printed) _____

NAME: (printed) _____

POSITION: _____

POSITION: _____

DATE: ____/____/____

DATE: ____/____/____

SEAL (if signing under seal)



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Department of Finance

Licence: L8190/2007/1

Registered office: Department of Finance
Building Management and Works
Optima Centre, 16 Parkland Road
OSBORNE PARK WA 6017

Premises address: Intractable Waste Disposal Facility Mt Walton East
Portion of Reserve No. 42001, approximately 100 km north of Great Eastern
Highway
BOORABBIN, WA, 6429

Issue date: Thursday, 14 February 2008

Commencement date: Monday, 18 February 2008

Expiry date: Friday, 17 February 2017

Decision

Based on the assessment detailed in this document, the Department of Environment Regulation (DER), has decided to issue an amended licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by: Abnesh Chetty
Licensing Officer

Decision Document authorised by: Steve Checker
Delegated Officer



Contents

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2 Administrative summary	3
3 Executive summary of proposal and assessment	4
4 Decision table	5
5 Advertisement and consultation table	6
6 Risk Assessment	7

1 Purpose of this Document

This decision document explains how DER has assessed and determined the application for a works approval or licence, and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/>	<input type="checkbox"/>
	New Licence <input type="checkbox"/>	<input type="checkbox"/>
	Licence amendment <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Works Approval amendment <input type="checkbox"/>	<input type="checkbox"/>
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	66	Not applicable
Application verified	Date: N/A	
Application fee paid	Date: N/A	
Works Approval has been complied with	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Compliance Certificate received	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Commercial-in-confidence claim	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Commercial-in-confidence claim outcome	N/A	
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/>
		Assessed under Part IV <input type="checkbox"/>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/>	Ministerial statement No:562
		EPA Report No:
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
		If Yes include details of which EPP(s) here.
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
		If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP.



3 Executive summary of proposal and assessment

The IWDF was established to take waste that is a management problem due to its toxicity or physical or chemicals properties that make it difficult to dispose of or to treat safely and is not suitable for disposal into a Class I, II, III or IV category of landfill. Examples of these wastes are:

- Radioactive wastes (approved by the Radiological Council of Western Australia);
- Significantly contaminated soils, industrial sludge (with any free liquid removed prior to transport), some spent catalyst wastes.

DoF operates the IWDF on a cost recovery basis, providing the only such disposal site in Western Australia. Use of the site has been very infrequent, with the most recent disposal of waste being in 2008.

DER is amending the current Licence (L8190/2007/1) to extend the expiry date by 12 months to 17 February 2016. This will allow for a full review of the Licence in accordance with DER's current licensing practices which was not able to be achieved under the previous expiry date due to time constraints. Administrative changes have been incorporated in accordance with DER protocol.

The IWDF risk rating will remain as Medium until a full review of the site's operations has been carried out.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

Based on the information available to DER at the time of the renewal, DER is not aware of any changes at the premises that would alter the risk profile for emissions and discharges since the previous licence was granted.

DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Licence Duration	N/A	N/A	DER will amend the current Licence and extend the duration of the Licence for 12 months to allow for a fully review of the sites Licence to be carried out. DER will consider the duration of any future licence issues based on the outcomes of the review. Administrative changes have also been incorporated in accordance with DER protocol.	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
4/02/2016	Proponent sent a copy of draft instrument	Confirmation and acceptance of the draft amended instrument was provided on 10 February 2016.	Finalisation of instrument



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High

**NOTICE OF AMENDMENT OF LICENCE EXPIRY DATES
SECTION 59B(9) AND SECTION 59(1)(k) ENVIRONMENTAL PROTECTION ACT 1986
LICENCED PRESCRIBED PREMISES**

Section 63 of the *Environmental Protection Act 1986* prescribes that a licence shall continue in force for such period as is specified in the licence. The Department of Environment Regulation's (DER) Guidance Statement on Licence Duration provides for the granting of licences for up to 20 years duration.

In accordance with section 59(1)(k) of the *Environmental Protection Act 1986*, the CEO may amend the duration of a licence. Having had regard to the Guidance Statement on Licence Duration, the Chief Executive Officer (CEO) has determined that the licence expiry dates for almost all of the licensed prescribed premises are to be amended. The following matters have been considered:

- confirmations which have been received from licensees and local government authorities have been considered to ensure that amended expiry dates do not exceed the duration of any relevant planning approvals and mining tenements;
- risk-based reviews for the assessment of licenced prescribed premises will be undertaken in accordance with DER's regulatory framework;
- licenced prescribed premises will be subject to ongoing compliance inspections and investigations following incidences and complaints, in accordance with the EP Act;
- in the event that risk issues arise in relation to licenced prescribed premises, the CEO may, depending on the circumstances:
 - amend the conditions of licenced prescribed premises at any time;
 - in the event of an alleged offence, exercise enforcement powers under the EP Act, including an environmental protection notice; and
 - in the event of breach of licence conditions, revoke the licence;
- to ensure the efficient operation of the licensing regime, the regulatory burden of frequent renewals in the absence of full assessment has been removed; and
- the extension of expiry dates will enable both DER and affected licensees to undertake an ordered and structured implementation of DER's risk-based regulatory framework to existing premises.

Notice of Amendments

This notice is given in accordance with section 59B(9) of the *Environmental Protection Act 1986* that the following licences are hereby amended to have the new expiry date in accordance with the schedule set out below. These amendments are effective as of 29 April 2016.

Jason Banks

DIRECTOR GENERAL
DEPARTMENT OF ENVIRONMENT REGULATION

29 April 2016

SCHEDULE OF LICENCE PREMISES EXPIRY DATE AMENDMENTS

LICENCE	OCCUPIER NAME	PREMISES NAME	COMMENCEMENT DATE	PREVIOUS EXPIRY DATE	NEW EXPIRY DATE
L8171/2007/2	Daromi Pty Ltd	RMD Tankers	30 August 2012	29 August 2017	29 August 2027
L8173/2007/2	Poseidon Nickel Limited	Windarra Nickel Project	22 October 2013	21 October 2018	21 October 2027
L8174/2007/5	Alcoa of Australia Ltd	Wagerup Cogeneration Plant	29 November 2014	28 November 2016	28 November 2034
L8176/2007/2	Holcim (Australia) Pty Limited	Baldivis Sand Quarry	4 March 2011	2 June 2016	3 March 2029
L8177/2007/2	Downer EDi Works Pty Ltd	Downer EDI Works Pty Ltd - Narngulu Asphalt Plant	8 October 2012	7 October 2017	7 October 2022
L8190/2007/1	Department of Finance	Mt Walton Intractable Waste Disposal Facility (IWDF) Class V Landfill	18 February 2008	17 February 2017	17 February 2022
L8193/2007/3	Talisman Nickel Pty Ltd	Sinclair Nickel Project	20 October 2014	19 October 2019	19 October 2026
L8194/2007/3	Fortescue Metals Group Limited	Anderson Point Materials Handling Facility	24 April 2014	23 April 2017	23 April 2027
L8199/2007/2	Chichester Metals Pty Ltd	Cloudbreak Iron Ore Mine	4 February 2012	3 February 2026	3 February 2032
L8202/2007/2	Water Corporation	Cunderdin Wastewater Treatment Plant	16 July 2014	15 July 2019	15 July 2032
L8222/2008/2	Naturaliste Vintners Pty Ltd	Naturaliste Vintners Winery	28 September 2014	27 September 2016	27 September 2036
L8225/2008/2	Main Roads Western Australia	Asphalt Manufacturing Derby	2 June 2013	1 June 2018	1 June 2034
L8232/2008/2	Pilbara Iron Company (Services) Pty Ltd	Brockman 4 Mine	31 July 2013	30 July 2018	30 July 2029
L8234/2008/2	Robe River Mining Co Pty Ltd	Mesa A Warramboe Iron Ore Mine	31 July 2013	30 July 2018	30 July 2033
L8235/2008/2	Ian & Jemima Minty	Narrabie Farm	8 July 2013	7 July 2018	7 July 2030
L8237/2008/2	Water Corporation	Corrigin Wastewater Treatment Plant	10 December 2014	9 December 2019	9 December 2023
L8238/2008/2	Water Corporation	Quairading Wastewater Treatment Plant	5 December 2014	4 December 2019	4 December 2029
L8239/2008/2	Water Corporation	York Wastewater Treatment Plant	22 April 2015	21 April 2020	21 April 2028
L8240/2008/2	Water Corporation	Narembeen Wastewater Treatment Plant	20 May 2015	19 May 2020	19 May 2033
L8241/2008/2	Mr Ambrose James Smith & Mrs Shiralee Smith	WA Tyre Recovery - Albany Storage	29 May 2013	28 May 2018	28 May 2028
L8242/2008/4	AnaeCo Limited	AnaeCo Limited	22 January 2014	21 January 2017	21 January 2023
L8245/2008/2	Water Corporation	Narngulu Wastewater Treatment Plant	6 October 2013	5 October 2018	5 October 2024
L8246/2008/2	Romine Holdings Pty Ltd f/t Wren Family Trust	Wren Oil Midvale Depot	4 August 2013	3 August 2018	3 August 2031
L8247/2008/2	IPM Operation & Maintenance Kwinana Pty Ltd	Kwinana Cogeneration Plant	3 July 2013	2 July 2018	2 July 2034
L8249/2008/2	Focus Operations Pty Ltd	Three Mile Hill Mine Site	29 September 2013	28 September 2018	28 September 2022

APPENDIX D

ASNO Permit PN207



PERMIT TO POSSESS NUCLEAR MATERIAL

This Permit granted pursuant to Section 13 of the *Nuclear Non-Proliferation (Safeguards) Act 1987* ("the Act") authorises the Permit Holder to possess the *nuclear material* designated in Part 1, subject to *the Act* and any orders, directions or regulations made thereunder and to the restrictions and conditions set out in Parts 1, 2 and 3 hereunder. Under section 21 of *the Act*, this Permit does not make it lawful for the Permit Holder to do any act or thing that, apart from *the Act*, is unlawful under another law of the Commonwealth or under a law of a State or Territory.

In this Permit, unless the contrary intention appears, words and phrases have the same meaning as in *the Act*. Terms in italics have specialised meanings, which are defined in Section 5 of the Class L2 *Compliance Code*.

The *Compliance Code* is an integral part of this Permit.

PART 1

1.	NAME	Minister for Works C/- Department of Finance (Western Australia)		
	ABN/ACN	99 593 347 728		
2.	ADDRESS			
	2.1. Physical Address	Department of Finance, Optima Centre 16 Parkland Road, OSBORNE PARK WA 6017		
	2.2. Postal Address	Department of Finance Locked Bag 44, CLOISTERS SQUARE WA 6850		
3.	PERMIT NUMBER	PN207	Version	3
			Class	L2
4.	DATES OF EFFECT			
	4.1. Commencement Date	30 October 2020		
	4.2. Expiration Date	30 November 2024		
5.	Chemical and isotopic composition and physical form of <i>nuclear material</i> in relation to which this Permit has effect ("the nuclear material")	6.	Maximum amount that the Permit Holder may possess at any one time under this Permit	
	Source Material		Element Weight	
	5.1 Depleted uranium in any form	6.1	500 kilograms	
	5.2 Natural uranium in any form	6.2	500 kilograms	
	5.3 Thorium in any form	6.3	500 kilograms	
	Special Fissionable Material		Isotope Weight	
	5.4 Uranium-235 (as enriched U) in any form	6.4	5 grams	
	5.5 Uranium-233 in any form	6.5	5 grams	
	5.6 Plutonium-239 in any form	6.6	5 grams	



7. Permit History

Version	Date of Effect	Description
1	21/11/2011	Permit original issue
2	28/09/2018	Variation—Issue of permit using Class L2 template
3	30/10/2020	This Variation – Extension to permit and minor language updates to paragraphs 8 to 13 and Compliance Code sections 1, 3 and 4. Definitions updated and moved to Compliance Code.

This Variation of the Permit is issued on the 19th of October 2020.

John Kalish
Acting Director General
ASNO



8. **Authorised Use**

8.1. Storage.

9. **Locations for Which This Permit has Effect ("Approved Locations")**

9.1. Storage at:

- a) Intractable Waste Disposal Facility (IWDF), Mt Walton East, Crown Reserve 42001, Western Australia, (GPS coordinates at centre point Lat -30 22' 43" Long 120 8' 46"); and
- b) any other location/s as approved by the *Director General*.

10. **Transport for Which This Permit has Effect**

This Permit grants the Permit Holder permission to transport *nuclear material* to anywhere within Australia for amounts up to those specified in paragraphs 5 and 6.



PART 2

11. Communications with the Director General

11.1. The Permit Holder or *Designated Individual* shall submit all applications, notifications and reports to the *Director General* via the following means:

- ASNO's NUMBAT online database portal: (<https://numbat.dfat.gov.au>);
- EMAIL: nuclear.asno@dfat.gov.au;
- Australian Safeguards and Non-Proliferation Office
RG Casey Building
John McEwen Crescent
Barton, ACT 0221; or
- as otherwise specified in writing by the *Director General*.

NOTE: A reference to the Director General in relation to applications, approvals, notification or reports under this Permit or its Compliance Code includes the Director General and ASNO inspectors.

12. Principles

The Permit Holder shall:

- 12.1. implement the requirements of the *Compliance Code*;
- 12.2. not commence any activity for which approval of the *Director General* is required, prior to the receipt of written approval from the *Director General*;
- 12.3. carry out such activity in accordance with any requirements specified by the *Director General* in such approval;
- 12.4. not transfer *nuclear material* to another person in Australia or aid, abet, counsel or procure such a transfer, unless the transferee is the holder of:
 - a) a current appropriate Permit to Possess Nuclear Material granted under section 13 of *the Act*; except for *nuclear material* to which Part II of *the Act* does not apply when in the possession of the transferee; or
 - b) a current appropriate Special Transport Permit granted under section 16 of *the Act*; except for *nuclear material* of a kind prescribed by the regulations for the purpose of sub-section 24(1) of *the Act*;
- 12.5. train all persons authorised by the Permit Holder to have access to *nuclear material* in the conditions of this Permit and the Permit Holder's procedures enabling it to meet these conditions;
- 12.6. notify the *Director General*, where a *loss of control* or incident involving *nuclear material* has occurred; and
- 12.7. apply any special conditions as set out in Appendix A of this Permit.



13. Inspections by ASNO Inspectors and Agency Inspectors

13.1. The Permit Holder shall:

- 13.1.1 provide *inspector(s)* with an up-to-date *inventory* listing at the commencement of an inspection;
- 13.1.2 provide, within 2 hours of a request by *inspector(s)*, copies of any other record(s), demonstrating that the Permit Holder has operated, and is operating, in compliance with this Permit and the *Compliance Code*;
- 13.1.3 ensure, at the time of each inspection, the presence of persons responsible for those areas being inspected and the necessary personnel responsible for handling the *nuclear material*;
- 13.1.4 make available, at the request of the *inspector(s)*, equipment that the Permit Holder has available for measurement of the *nuclear material* and, the means and staff required for handling the *nuclear material*;
- 13.1.5 if requested, provide suitable office space at the *Approved Locations* to facilitate inspection functions; and
- 13.1.6 afford *inspector(s)* every assistance and comply with any reasonable request in order to achieve a relevant safeguards purpose.

13.2. To further the health and safety requirements under the current Work Health and Safety legislation, and relevant state and federal legislation, regulations and standards, the Permit Holder shall:

- 13.2.1 provide to the *inspector(s)* (and the *Director General*, on request) sufficient information, training, instruction or supervision in order to allow those *inspectors* to comply with any health and safety procedures applicable at the *Approved Locations* and carry out their duties at the *Approved Locations* without risk to their health or safety;
- 13.2.2 provide the *inspector(s)* with all necessary personal protective equipment in order to ensure, so far as reasonably practicable, their health and safety while carrying out duties at the *Approved Locations*;
- 13.2.3 respond promptly to any request for information by an *inspector*, *Agency inspector*, or an officer of ASNO acting on behalf of such an *inspector*, regarding the procedures or equipment referred to in paragraphs 13.2.1 and 13.2.2; and
- 13.2.4 take any other reasonable steps to ensure the health and safety of the *inspector(s)* while those *inspectors* are at the *Approved Locations*, including steps to comply with any applicable provisions of a radiation protection law or regulation of the jurisdiction in which the Permit Holder is located which applies to the Permit Holder (in whole or in part).



PART 3

14. Inspections to be Permitted

- 14.1. The Permit is granted on condition that the Permit Holder consents, for the purposes of sections 59 and 60 of *the Act*, to all inspections carried out including:
- 14.1.1 the entry by any *ASNO inspector* upon any land or upon or into any premises occupied by the Permit Holder and the exercise by that *inspector* of any relevant power for any relevant safeguards purpose;
 - 14.1.2 the entry by any *ASNO inspector* upon any vessel, aircraft or vehicle in the control of the Permit Holder and the exercise by that *inspector* of any relevant power for any relevant safeguards purpose;
 - 14.1.3 the entry by any *Agency inspector* upon any land or upon or into any premises occupied by the Permit Holder, and the exercise by that *Agency inspector* of any relevant power for the purposes of carrying out an inspection that the *Agency* has the right to make in accordance with the *Agency Agreement* and the *Additional Protocol*;
 - 14.1.4 the entry by an *Agency inspector* upon any vessel, aircraft or vehicle in the control of the Permit Holder, and the exercise by that *Agency inspector* of any relevant power for the purposes of carrying out an inspection that the *Agency* has the right to make in accordance with the *Agency Agreement* and the *Additional Protocol*; and
 - 14.1.5 the Permit Holder shall provide upon request of an *inspector* or *Agency inspector* access to any place within an *Approved Location* as soon as possible, and in any case within 2 hours of a request for such access.
- 14.2. An *inspector* or *Agency inspector* exercising any relevant power is required to comply with the provisions of section 64 of *the Act*.

NOTE: *Subject to the Administrative Appeals Tribunal Act 1975 and to sub-section 22(8) of the Nuclear Non-Proliferation (Safeguards) Act 1987, application may be made to the Administrative Appeals Tribunal, by or on behalf of a person whose interests are affected by a decision by the Minister, pursuant to sub-section (2) of section 13 of the Act, imposing a condition or restriction on the grant of a Permit, for review of the decision.*



Appendix A – Special conditions for Permit PN207

1. For *nuclear material* that has been stored below ground since before the commencement date in paragraph 4.1 in shaft 92RS01, shaft 94RS01, trench 2000RT01, trench 2002RT01 or trench 2008RT01 (or any other below ground location/s with no intention of retrieval as approved by the *Director General* in writing on a case by case basis), the following special conditions shall apply:
 - a. Section 1.1.2 of the Compliance Code does not apply; and
 - b. Section 4.1.2 of the Compliance Code is replaced by
“securing inventory in a drum-in-drum structure where 60 litre drums are filled with cement-based grout and placed inside 200 litre drums filled with concrete, (or any other packaging structure as approved by the *Director General* on a case by case basis); and”
2. For any *nuclear material* that has not been stored below ground since before the commencement date in paragraph 4.1, the conditions in the Compliance Code shall apply and in particular:
 - a. the Permit Holder shall not receive or otherwise allow such *nuclear material* to arrive at an Approved Location prior to the receipt of written approval from the *Director General*; and
 - b. the Permit Holder shall not place below ground or allow the placement below ground of such *nuclear material* prior to the receipt of written approval from the *Director General*.

Note: In accordance with section 3 of the Compliance Code, the Permit Holder shall use the forms listed in section 3.1 for the purposes of seeking the approval of the *Director General*.

– END OF PERMIT –



COMPLIANCE CODE FOR CLASS L2 PERMITS

Compliance Code History

Version	Date of Effect	Description
1	18/09/2015	Compliance Code first issue
2	28/09/2020	New section 4.2, incorporation of definitions section, minor updates to various conditions
3		

Purpose

The purpose of this *Compliance Code* is to establish a standard set of requirements for the systems of *Nuclear Material Accounting and Control* and *Nuclear Security* for all Class L2 Permits to Possess Nuclear Material issued under section 13 of *the Act*. It also sets out forms for the submission of applications, notifications and reports.

Scope

This *Compliance Code* applies to Permits to Possess Nuclear Material issued under section 13 of *the Act* identified under paragraph 3 of the Permit as a Class L2 Permit. The requirements of the code apply to all *nuclear material* in the possession of the Permit Holder except *nuclear material* which is declared under section 11 of *the Act* as exempt from the application of Part II of *the Act*.

For the purpose of this *Compliance Code*, *nuclear security* will be taken to apply to *nuclear material* including *UOC*, but not to include other radioactive materials.

1. Nuclear Material Accounting and Control (NMAC) System

1.1. The Permit Holder shall:

- 1.1.1 keep an *inventory* listing of *nuclear material* up-to-date;
- 1.1.2 label all physical batches and containers of *nuclear material* on the Permit Holder's *inventory*, with unique identification markings in a way that enables timely matching with batch numbers assigned by ASNO;
- 1.1.3 maintain organisational arrangements enabling the Permit Holder to determine the precise location of any material on the Permit Holder's *inventory* in less than 2 hours;
- 1.1.4 keep records of transfers of *nuclear material*;
- 1.1.5 conduct a Physical Inventory Taking (stocktake) not more than thirty (30) days prior to and no later than 30 June each year (or other dates as may be designated by ASNO in advance), of any *nuclear material* on the *inventory*;
- 1.1.6 maintain organisational arrangements to detect any *loss of control of nuclear material* listed on the *inventory* within 7 days; and
- 1.1.7 retain records of holdings and transfers of *nuclear material* for a period of 5 years.

1.2. Given the low safeguards significance of material covered by Class L2 Permits, the Permit Holder is not required to develop formal written NMAC procedures.



2. Reports, Notifications and Requests for Approvals

- 2.1. The Permit Holder or *Designated Individual* shall report to, notify or apply to the *Director General* as appropriate for each activity or item listed in section 3.
- 2.2. Each such report, notification or application shall be made by completing the specified forms listed in section 3 or using other formats as approved by ASNO.
- 2.3. The reports, notifications or applications shall be delivered to the *Director General* in accordance with the reporting requirements specified on the respective form.
- 2.4. Reporting of domestic and international transfers:
The Permit Holder shall:
- 2.4.1 Provide an annual report (as at 30 June) to ASNO and submit the report by the 5th of July of the same year (or other dates as may be designated by ASNO in advance), including:
- (i) Physical Inventory Taking as described in section 1.1.5; and
 - (ii) All *inventory* changes that occurred during the reporting period.
- 2.4.2 Notify ASNO of all international transfers (dispatch of *nuclear material* under this Permit or receipt of *nuclear material* to this Permit) in accordance with the reporting timeframes and forms.

3. ASNO Forms

The Permit Holder shall use the forms listed in sections 3.1-3.3 available at www.dfat.gov.au/asno, as amended from time to time or the equivalent on ASNO's online portal (the NUMBAT database portal <https://numbat.dfat.gov.au>).

3.1. Application Forms

APPLICATION FORMS TO CONDUCT CERTAIN ACTIONS: ¹	TIMEFRAME LIMITS FOR APPLICATIONS, NOTICE OR REPORTING: ^{2, 3}	FORM TO USE:
Application to Transfer Material (Import, Export or Domestic Transfer)	- 7 day notice	ASO106
Application to Consume, Dilute or Dispose of Nuclear Material or Associated Item ⁴	- 7 day notice	ASO108
Application to Create a New Approved Location	- 7 day notice	ASO112
Application to Vary Disposition of Material Such That it will Become Unavailable for Verification	- 14 day notice	ASO128

¹ Each report, notification or application should be made by the *Permit Holder's Representative* or by a *Designated Individual* as notified under ASO214, responsible for compliance with that application requirement.

² Refer to related form for detailed timeframe requirements. All days refer to consecutive business days.

³ For events requiring approval forms, the event must not take place before ASNO approval is granted.

⁴ *Nuclear material* may only be disposed of in such a way that the *nuclear material* will become practicably irrecoverable.



3.2. Notification Forms

NOTIFICATION IS REQUIRED FOR: ¹	TIMEFRAME LIMITS FOR APPLICATIONS, NOTICE OR REPORTING: ²	FORM TO USE:
Notification of an Incident	- Report incidents by phone within 2 hrs. of detection - submit form within 4 hrs.	ASO201
Notification of Designation of an Individual		ASO214
Notification of Change to Permit Holder's Particulars	- Within 10 days of effect of change	ASO231

3.3. Report Forms

REQUIRED REPORTS: ¹	TIMEFRAME LIMITS FOR APPLICATIONS, NOTICE OR REPORTING: ²	FORM TO USE:
Report on Incident Investigation	- Within 10 days of initial notification	ASO303
Inventory Listing (Nuclear Materials and Associated Materials)	- 5 days after the physical inventory taking date set in 1.1.5	ASO310
Ledger Page	- Report monthly transactions or - 5 days after the physical inventory taking date set in 1.1.5	ASO311
Description of each building at an approved Location	- 15th of March every year	ASO316
Initial inventory listing		ASO323

4. Security Measures

- 4.1. The Permit Holder shall maintain security measures for preventing the theft, loss or unauthorised handling of *nuclear material* and its associated records, including:
- 4.1.1 restricting access to *nuclear material* to persons who need to access such material;
 - 4.1.2 securing *nuclear material* in a lockable room or container or, for *nuclear material* incorporated into equipment, securing the equipment; and
 - 4.1.3 maintaining documentary records associated with the Permit conditions (e.g. defined access list, log in/out sheet)
- 4.2. The Permit Holder shall promptly notify *the Director General* within 2 hours of detection of each incident under Form ASO201 of a:
- 4.2.1 *loss of control* including actual, attempted or suspected theft, loss or compromise of *nuclear material*;
 - 4.2.2 unauthorised access to *nuclear material*; or
 - 4.2.3 adverse failure of the security measures.

¹ Each report, notification or application should be made by the *Permit Holder's Representative* or by a *Designated Individual* as notified under ASO214, responsible for compliance with that application requirement.

² Refer to related form for detailed timeframe requirements. All days refer to consecutive business days.



5. Definitions

(the) Act	The <i>Nuclear Non-Proliferation (Safeguards) Act 1987</i> .
Additional Protocol	The Protocol Additional to the Agency Agreement (INFCIRC/217/Add.1) that entered into force on 12 December 1997.
(the) Agency	The International Atomic Energy Agency (IAEA).
Agency Agreement	The Agreement between Australia and the International Atomic Energy Agency for the Application of Safeguards in Connection with the Treaty on the Non-Proliferation of Nuclear Weapons (INFCIRC/217), being the Agreement which was signed on behalf of Australia on 10 July 1974, a copy of which is set out in Schedule 3 of <i>the Act</i> .
ASNO	The Australian Safeguards and Non-Proliferation Office.
Designated Individual(s)	Individual(s) to whom the <i>Permit Holder's Representative</i> delegates some of the responsibility and authority with respect to compliance with this Permit.
Director General	The Director General of the Australian Safeguards and Non-Proliferation Office.
Inspector	A person appointed an inspector or a person declared an Agency inspector, pursuant to section 57 of <i>the Act</i> .
Inventory	The entire physical stock of <i>nuclear material</i> , irrespective of its form or usefulness, held by the Permit Holder.
Loss of Control (of material)	The Permit Holder has lost the ability to apply the Permit conditions (on a continuous basis) to <i>nuclear material</i> including UOC or associated items (including technology, material or equipment).
Nuclear fuel cycle-related research and development activities	Those activities which are specifically related to any process or system development aspect of any conversion of <i>nuclear material</i> , enrichment of <i>nuclear material</i> , nuclear fuel fabrication, reactors, critical facilities, reprocessing of nuclear fuel, processing (not including repackaging or conditioning not involving the separation of elements, for storage or disposal) of intermediate or high-level waste containing plutonium, or high enriched uranium or uranium-233. It does not include activities related to theoretical or basic scientific research or to research and development on industrial radioisotope applications, medical, hydrological and agricultural applications, health and environmental effects and improved maintenance.



Nuclear Material	<i>Source and special fissionable material</i> the same as in <i>the Act</i> but for the purposes of this Permit excludes material that has been deemed by ASNO as practicably irrecoverable (Schedule 3, Article 11 of <i>the Act</i>) or material that is the subject of an exemption or termination declaration under section 11 of <i>the Act</i> .
Nuclear Security	The prevention of, detection of, and response to, criminal or intentional unauthorised acts involving or directed at <i>nuclear material</i> , nuclear facilities and associated items. NOTE: <i>The Act</i> refers to physical security, which in relation to the protection of <i>nuclear material</i> , is defined as nuclear security or physical protection consistent with IAEA guidance material, and for the protection of associated items, as protective security consistent with the Australian Physical Security Policy Framework (PSPF).
Permit Holder's Representative	The representative of the Permit Holder (i.e. the organisation) who will take responsibility and sign documents on behalf of the organisation. This person must be in a position with sufficient authority to ensure all Permit conditions are met.
Source Material and Special Fissionable Material	The same as in Schedule 1 of <i>the Act</i> .
UOC	Uranium ore concentrates

NOTE: Subject to the Administrative Appeals Tribunal Act 1975 and to sub-section 22(8) of the Nuclear Non-Proliferation (Safeguards) Act 1987, application may be made to the Administrative Appeals Tribunal, by or on behalf of a person whose interests are affected by a decision by the Minister, pursuant to sub-section (2) of section 13 of the Act, imposing a condition or restriction on the grant of a Permit, for review of the decision.

APPENDIX E

2020 – 2021 Management Plans



ENVIRONMENTAL, HEALTH & SAFETY AND RADIATION MANAGEMENT PLANS

INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

In accordance with proponent commitment 3.1 - 3.8 of the Ministerial Statement for the operation & management of the IWDF, Mt Walton East eleven Management Plans have been developed.

These Management Plans provide a summary of the methods & controls that are in place, & must be maintained, to achieve ongoing management goals and targets & maintain operational performance.

Each Management Plan is designed to address an aspect of the IWDF's activities or management, as listed below:

1. Air Quality
2. Decommissioning and Rehabilitation
3. Emergency Response
4. Flora and Fauna
5. Health and Safety
6. Radiation
7. Transport
8. Water
9. Waste Acceptance
10. Community Liaison
11. Management Review

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO. 1 INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST
AIR QUALITY
Environmental, Health and Safety Policy Statement: Take all practical steps to minimise the impact of the site & operational activities on the environment, & the community, & ensure the protection of the health & safety of the public & the IWDF personnel by appropriate training of all personnel.
Management Goal: To effectively manage air quality at the IWDF.
Management Objective: To ensure dust & air emissions are monitored & managed effectively to minimise potential risks to health & the environment.



Management Target:

- No waste dust released during operations at the site.
- Minimal atmospheric emissions from vehicles and machinery.
- No health or environmental effects resulting from air or dust emissions.

Management Program:

- FMC will undertake inspections to ensure that waste is appropriately packaged, transported, and unloaded to prevent spillage or rupture.
- If a waste package ruptures, the waste material will be covered as soon as possible, and any spillage immediately contained and recovered.
- Appropriate personal protective equipment and safety measures will be utilised when necessary.
- Dust suppression techniques will be employed during earthworks.
- Dust monitoring shall be undertaken.
- Vehicles and machinery will be serviced regularly to ensure optimal efficiency.

Improvement Program:

Relevant Documents and Procedures:

- Environmental Procedure EP-06: Air Quality and Dust Management.
- Environmental Instruction EI-02: Soil and Dust Environmental Sampling.
- Emergency Response Procedure ERP-01: Incident Prevention, Reporting & Investigation.
- OHS&ER Procedures (operation specific air quality requirements).
- A guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities (DEC Mar 2011).
- AS / NZS 3580.10.1: 2016 Methods for Sampling and Analysis of Ambient Air - Determination of particulate matter - Deposited matter - Gravimetric method.
- AS / NZS 3580.1.1: 2016 Methods for Sampling and Analysis of Ambient Air - Guide to siting air monitoring equipment
- AS / NZS 3580.9.13:2013 Methods for sampling and analysis of ambient air - Determination of suspended particulate matter - PM2.5 continuous direct mass method using a tapered element oscillating microbalance monitor. (AS /NZS Standards checked for currency May 2021).

Forms:

- IWDF Form-03: Sampling/Groundwater Monitoring Record.
- IWDF Form-01: Chain of Custody.

Monitoring of Performance:

- Predisposal monitoring:- 5 days minimum dust sampling.
- Disposal operations: dust samples will be collected during disposal at designated sites around the cell.
- In the case of a spill, samples shall be gathered from gauges in the vicinity of the spill & downwind.

Reporting:

Annual Performance and Compliance Report

Key Responsibilities:

- Facility Management Contractor – monitoring.
- Environment Manager: Implementation.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

DECOMMISSIONING AND REHABILITATION - A
OPERATION SPECIFIC AND ONGOING

Environmental, Health and Safety Policy Statement:

Use recognised current best practices for near surface disposal of hazardous and low-level radioactive wastes and to remain aware of international advances in intractable waste management technology.

Management Goal:

To return the site to as close as original condition as possible.

Management Objective:

To ensure that areas of the site that have ceased to be operational are progressively decommissioned and rehabilitated in manner which restores the original ecosystem.

Management Target:

- Re-establishment of indigenous habitats following conclusion of their operational use.
- No introduction of non-indigenous species.

Management Program:

- Vegetation and topsoil cleared during operations is stockpiled nearby.
- Cleared areas shall be rehabilitated using the stockpiled vegetation and topsoil following completion of their use (except for fenced disposal compounds and tracks used for access).
- Areas undergoing rehabilitation will be monitored annually & assessed by a botanist every ten years
- Upon completion of site works temporary infrastructure shall be removed.
- Disused tracks & road shall be allowed to revegetate naturally.

Improvement program:

- Nil – see long term & site closure management plan below.

Relevant Documents and Procedures:

- Environmental Procedure EP-05: Rehabilitation Management (includes vegetation completion criteria).
- Environmental Instruction EI-04: Rehabilitation Monitoring.
- Flora identification kit (significant flora) Aug 2019 – located within FMC EHSMS.
- Review rehabilitation scenarios every five years & seek approval from the Radiological Council (RCWA) – review was completed May 2014, Proposed Final Cover for Waste Disposal Cells at the Intractable Waste Disposal Facility, Mt Walton East (Clayvault WA, May 2014), – submitted to RCWA July 2015, reviewed, and resubmitted to RCWA 6 November 2019, comment/approval not yet received from RCWA).

Forms:

- IWDF Form 38a: Rehabilitation Monitoring Record.
- IWDF Form 39: Monitoring Register.
- Monitoring Location Figure – showing location of photo points, monitoring bores and any priority flora.



Performance Monitoring: <ul style="list-style-type: none">• Botanist: Inspect the progress of rehabilitation every ten years (next due Oct 2024).• FMC personnel: annual monitoring of rehabilitation (preferably in spring [next due Oct 2021])
Reporting: Annual Performance and Compliance Report - monitoring results for the reporting period
Key Responsibilities: <ul style="list-style-type: none">• FMC Site Personnel: Annual Monitoring• Botanist: Rehabilitation Progress Status

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2 MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY
DECOMMISSIONING AND REHABILITATION - B LONG TERM AND SITE CLOSURE
Environmental, Health and Safety Policy Statement: Use recognised current best practices for near surface disposal of hazardous & low-level radioactive wastes and to remain aware of international advances in technology.
Management Goal: To return the site to as close as original condition as possible.
Management Objective: To ensure that the site is rehabilitated & decommissioned in manner which restores the original ecosystem.
Management Target: <ul style="list-style-type: none">• Re-establish removed & disturbed indigenous habitats to their original level of species diversity.• All site infrastructure removed.
Management Program: <ul style="list-style-type: none">• A decommissioning statement will be prepared six months prior to decommissioning.• Review rehabilitation scenarios every five years & seek approval from the Radiological Council (RCWA) (review was completed May 2014, <i>Proposed Final Cover for Waste Disposal Cells at the Intractable Waste Disposal Facility, Mt Walton East</i> (Clayvault WA, May 2014), – submitted to RCWA July 2015, reviewed, and resubmitted to RCWA 6 Nov 2019, resubmitted December 2020).• The decommissioning statement will include a zone of restricted occupancy outside the site perimeter as a region in which there is public access, but in which permanent occupancy is prohibited for the institutional control period.
Improvement program: <ul style="list-style-type: none">• Seek approval from the Radiological Council for the review of rehabilitation scenarios as completed May 2014 and reviewed / resubmitted 2019.



<p>Relevant Documents and Procedures:</p> <ul style="list-style-type: none"> • Environmental Procedure EP-05: Rehabilitation Management (includes veg completion criteria). • Work Instruction WI-04b: Rehabilitation Monitoring. • Decommissioning and Rehabilitation Plan (to be developed 6 months prior to closure).
<p>Forms:</p> <ul style="list-style-type: none"> • IWDF Form 38a: Rehabilitation Monitoring Record. • IWDF Form 39: Monitoring Register. • Monitoring location figure showing vegetation photo point locations & groundwater monitoring & priority flora locations.
<p>Performance Monitoring:</p> <ul style="list-style-type: none"> • Botanist: Inspect the progress of vegetation rehabilitation every ten years – due Oct 2024 • IWDF Project Manager: Monitoring of rehabilitation every 12 months (in spring) due Oct 2021.
<p>Reporting: Annual Performance and Compliance Report</p>
<p>Key Responsibilities: IWDF FMC Project Manager: coordinate development of Decommissioning Statement and Rehabilitation Plan when required</p>

<p>ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 3 INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST</p>
<p>EMERGENCY RESPONSE</p>
<p>Environmental, Health and Safety Policy Statement:</p> <ul style="list-style-type: none"> • Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF, <u>through a process of continual review</u>. • Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.
<p>Management Goal: To prevent and effectively manage emergency incidents at the IWDF.</p>
<p>Management Objective: To ensure emergencies are responded to and managed effectively and efficiently.</p>



<p>Management Target:</p> <ul style="list-style-type: none">• No lost time injuries.• No harm or injury to the public or environment.• Quick, accurate and effective responses to emergencies.• Continual improvement and revision.
<p>Management Program:</p> <ul style="list-style-type: none">• Implement effective and appropriate emergency response procedures.• Report thoroughly on all emergency or potentially emergency incidents.• Investigate all incidents, accidents and near misses and implement corrective actions to prevent recurrence.• Provide all personnel with the appropriate equipment and training.
<p>Improvement Plan: Nil</p>
<p>Relevant Documents and Procedures:</p> <ul style="list-style-type: none">• Emergency Response Procedure ERP-01- Incident Prevention, Reporting and Investigation.• Emergency Response Procedure ERP-02- Emergency Response Management.• Management Procedure MP-13- Control of Non-Conformances & Corrective & Preventative Action.• Emergency Response Instruction ERI-01 Injury and Evacuation.• Emergency Response Instruction ERI-02 Waste Incident and Spill Response.• Emergency Response Instruction ERI-03 Fire Response.• Emergency Response Instruction ERI-04 Transport Emergency Response.• State Emergency Management A Strategic Framework for Emergency Management in Western Australia (came into effect 21 Dec 2018)• State Hazard Plan: Hazardous materials emergencies (HAZMAT) (came into effect 21 Dec 2018)
<p>Forms:</p> <ul style="list-style-type: none">• Emergency procedure sheets.• IWDF Form 06: Near Miss/ Incident/ Accident/Exposure Report.• IWDF Form 07: Near Miss/Incident/Accident/Exposure Report Register.• IWDF Form 36: Emergency Response Team Contact Details.• IWDF Form 42: Emergency Response Equipment Checklist.• Corrective Action Form (CAR)- MF-13-2.
<p>Performance Monitoring: Review and assessment of effectiveness of corrective actions</p>
<p>Reporting:</p> <ul style="list-style-type: none">• Close out Report• Annual Performance & Compliance report, operational specific incidents, and other incidents such as fires outside operations.
<p>Key Responsibilities:</p> <ul style="list-style-type: none">• Operations Manager / Safety Manager – revision, maintenance and implementation• IWDF FMC Project Manager – reporting



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 4
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

FLORA AND FAUNA

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health & environmental protection by ensuring the adequacy of the EMS, the environmental policy & operational activities at the IWDF, through a process of continual review.

Management Goal:

To minimise the impacts of the site on native flora and fauna.

Management Objective:

To ensure that potential impacts on native flora and fauna are effectively managed.

Management Target:

- Minimal impacts on native flora and fauna.
- Identify priority or endangered species.
- Prevent the contamination of flora, fauna and their habitats through dust.
- Prevent the introduction of non-indigenous species.

Management Program:

- Flora and fauna surveys shall be undertaken to identify species at the site.
- Prior to any clearing the conservation status of plants in that area will be determined and clearing avoided in areas containing priority species.
- A botanist shall be brought to site prior to significant clearing, where necessary.
- Unnecessary clearance or disturbance of vegetation shall be avoided.
- Fauna injuries and deaths will be treated as environmental incidents.
- Drivers within the IWDF shall be aware of native fauna .
- Trenches and boreholes shall be designed to prevent the trapping of fauna.
- Dust suppression techniques shall be used during operations.
- Priority flora identification kits to be regularly updated – to be reviewed October 2021 .

Improvement program:

Weed identification kit – regularly reviewed (to be reviewed October 2021)

Relevant Documents and Procedures:

- Environmental Procedure EP-01- Vegetation (Flora) Management.
- Environmental Procedure EP-02- Fauna Management.
- Emergency Response Procedures ERP-01- Incident Prevention , Reporting and Investigation.
- Environmental Procedure EP-05- Rehabilitation Management (includes veg completion criteria).
- Environmental Procedure EP-06- Air Quality and Dust Management.
- Florabase Declared Rare Flora and Priority Database.
- Flora and weed identification kits- reviewed/updated October 2021.



Forms:

- Location maps of priority species – Groundwater, trench capping & Rehabilitation monitoring locations.

Performance Monitoring:

Flora (and Fauna) surveys as required.

Reporting:

Identification of new priority or rare species – Department of Water & Environmental Regulation.

Key Responsibilities:

Environment Manager on advice of Botanist: approval of significant clearing.
Environment Manager: management of protection of flora and fauna.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 5
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

HEALTH AND SAFETY

Environmental, Health and Safety Policy Statement:

- Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF, through a process of continual review.
- Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.

Management Goal:

To provide a safe workplace and implement programs and strategies that ensure legislative compliance.

Management Objective:

To minimise the health and safety risks to the public and workers through the identification and management of potential risks.

Management Target:

- No lost time injuries.
- No major accidents or incidents.
- No complaints from the public.

Management Program:

- To comply with Operation Health and Safety and Emergency Response Procedures.
- Maintain a Health & Safety Aspects and Impacts Register.
- Ensure Safety Data Sheets are readily available.
- Report all incidents and near misses and implement corrective actions.
- Ensure appropriate safety equipment is worn and maintained, & all personnel are adequately trained.
- Hold safety management briefings, as appropriate to activities.
- To undertake regular site safety inspections and operation safety audits.

Improvement Program:

Nil

Relevant Documents and Procedures:

- Safety Procedure SP-01- Health and Safety Management and Planning.
- Safety Procedure SP-02 Operation Site Safety Management.
- Safety Instruction SI-01 Excavation Safety.
- Safety Instruction SI-02 Personal Protective Equipment.
- Safety Instruction SI-03 Hygiene and Decontamination.
- Safety Instruction SI-04 Occupational Monitoring.
- Safety Instruction SI-06 First Aid.



Forms:

- IWDF Form 06: Near Miss Incident/Accident/Exposure Report
- IWDF Form 34: Safety Management Schedule
- IWDF Form 37: Transport Induction Form
- IWDF Form 43: Medical Advice Form
- IWDF Form 12a: Competency Plan
- IWDF Form 12b: Operational Training Register
- IWDF Form 27: Safety Record
- IWDF Form 28: Excavation Safety Record
- IWDF Form 30: Safety Audit Checklist
- IWDF Form 32: General Induction Form
- IWDF Form 33: Waste Handling Induction Form

Performance Monitoring:

- Safety Briefings.
- Site Inspections and operational safety audits.
- Effectiveness of corrective actions.
- Complaints.

Reporting:

Incidents: reported in accordance with ERP-01

Key Responsibilities:

- Health & Safety Manager and Operations Manager: Training, management, & implementation on site.
- Health & Safety Manager: planning and ongoing management

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 6
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

RADIATION

Environmental, Health and Safety Policy Statement:

Use recognised current best practices for near surface disposal of hazardous and low-level radioactive wastes and to remain aware of international advances in technology.

Management Goal:

To ensure radiation is managed effectively.

Management Objective:

To monitor and manage radioactive waste to ensure the environment, public and workers are protected from the adverse effects of radiation.



Management Target:

- Minimal release of radiation into the environment (compared to environmental background).
- Radiation levels within the safe occupational limits for workers.
- Comply with *Code for Disposal Facilities for Solid Radioactive Waste* (released October 2018).

Management Program:

- All radioactive wastes will be assessed against the Acceptance Criteria for Radioactive Wastes and be packaged and transported in the approved manner.
- The Radiological Council shall approve the design of the disposal trench.
- Radioactive waste will be placed in the disposal cell in accordance with the Radiological Council approvals and the position and activity of each drum recorded.
- A permanent marker shall be placed above all trenches containing radioactive waste.
- All personnel who come into proximity with radioactive waste shall attend an induction & wear personal radiation monitors.
- Predisposal, and post disposal occupational radiation monitoring shall be undertaken.
- Predisposal and post disposal environmental radiation monitoring.
- Gamma radiation surveys are to be conducted every five years, or associated with a burial operation involving radioactive waste, whichever is the shortest interval – last survey completed September 2017
- Third party technical compliance audit against the requirements of the *Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)* (NH&MRC, 1993) every five years (last completed October 2018) – although new code has been released compliance with the old CoP is still required as it is called up in s31A of the Radiation Safety Regulations 1983 and the IWDF registration.

Improvement Program:

- Investigate appropriate below ground markers before next disposal of radioactive waste.
- The IWDF cell final cover solution which is intended to be implemented after 25 -30 years post disposal, that is 2021 for the 1992 disposal cell, will include a covering of 200mm of topsoil over the clay water shedding dome and it is intended to place below ground markers over the dome prior to the application of the 200mm soil. The final cover solution has been provided to the RCWA, 8 December, for feedback. (June 2021 feedback not yet received)
- Complete procedure for providing public access to database.
- Complete Safety Assessment & Case – Draft Operations Safety Case submitted to ARPANSA Oct 2016 comment received from ARPANSA Q3 2020. Response/Action Plan prepared and provided to RCWA for review and feedback, Dec 2020. (June 2021 feedback not yet received)
- Update Radiation Instruction: Occupational Radiation Monitoring (Instruction RI- 02) V11 to include a 0.3 dose constraint for the public. (Completed Sept 2020)
- Document analysis of the behaviour of the cement matrix.

Relevant Documents and Procedures:

- Radioactive Waste Acceptance guidelines.
- Radioactive Instruction RI-01 Gamma Radiation Monitoring.
- Work Instruction RI-02: Occupational Radiation Monitoring.
- Radiation Management Procedure RP-01: Radiation Management.
- Safety Assessment Report for the IWDF Draft –21 October 2016
- Operations Safety Case for the IWDF (draft) – prepared 20 April 2017.



<p>Forms:</p> <ul style="list-style-type: none"> • Personal Radiation Monitoring form PRM-1: Passive Personal Radiation Monitors • Personal Radiation Monitoring form PRM-2: Integrated Electronic Dosimeters • Personal Radiation Monitoring form PRM-3: Personal Air Sampling • Personal Radiation Monitoring form PRM-4: gross alpha activity concentration
<p>Performance Monitoring:</p> <ul style="list-style-type: none"> • Pre-burial environmental radiation monitoring of disposal area. • Post-burial environmental radiation monitoring of the disposal compound. • On-going environmental radiation monitoring of disposal compounds – next 5 yearly round of monitoring to be undertaken in October 2022. • Occupational Radiation Monitoring.
<p>Reporting:</p> <ul style="list-style-type: none"> • Radiological Council: copy of each radiation monitoring report. • Community Liaison Committee: copy of each radiation monitoring report. • EPA: Annual Performance and Compliance Report which will include a copy of all radiation monitoring for each reporting period.
<p>Key Responsibilities: Radiation Safety Officer – radiation monitoring</p>

<p>ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 7 INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST</p>
<p>TRANSPORT</p>
<p>Environmental, Health and Safety Policy Statement: Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF, through a process of continual review.</p>
<p>Management Goal: To effectively manage the transport of waste to the IWDF.</p>
<p>Management Objective: To ensure waste is transported in a manner which minimises any potential risks to humans or the environment.</p>
<p>Management Target:</p> <ul style="list-style-type: none"> • No unacceptable (above background) effects on health or the environment from the transport of waste. • No spill or leakage of waste during transport.



Management Program:

- Operation Transport Procedures (OTP) shall be developed for each operation, which provide details of transport and packaging, emergency preparedness, contractor responsibilities, procedures, communications, and emergency response recovery, and are submitted to the EPA.
- Procedures for communications with the emergency response team, local community and emergency services shall be prepared and detailed in the OTP.
- Waste shall be packaged, labelled, and transported in accordance with the OTP and applicable dangerous goods and radioactive legislation, and a Finance delegate will inspect prior to transport to ensure compliance.
- Personnel involved in loading and transport of waste (including contractors) shall be briefed on the potential risks, emergency response and communication procedures.
- Appropriate protective clothing and equipment shall be used.
- Emergency Response Team (ERT) members shall be appropriately trained and equipped.
- Shipping documentation, OTP and emergency information shall be kept in the transport vehicle.
- If required, the Department of Fire & Emergency Services (DFES), Department of Mines, Industry Regulation & Safety (DMIRS), and the local shires shall be informed of transport routes and schedules.

Improvement Program:

Nil

Relevant Documents and Procedures:

- Waste Acceptance Criteria / Guidelines.
- Operational Procedure OP-04:Waste Preparation for Disposal.
- Operational Procedure OP-05: Waste Loading and Transport.
- Operation Transport Procedures.
- Emergency Response Plans.
- Emergency Response Instruction – Transport Emergency Response.
- Safety Instruction SI-07 Heavy Machinery Operations.
- Safety Instruction SI-05 Communications and Traffic Control.
- Operational Procedure OP-06: Waste Delivery, Acceptance and Disposal.

Forms:

- IWDF Form 45: Packaging and Loading Checklist
- IWDF Form 37: Transport Induction
- IWDF Form 35: Transport Incident Questionnaire
- IWDF Form 46: Transport Chain of Custody
- IWDF Form 47: Vehicle Checklist

Performance Monitoring:

Validation sampling in the event of a spill.

Reporting:

- **Close-out report:** results of operation specific transport activities
- Annual Performance and Compliance Report

Key Responsibilities:

- FMC Operations Manager and Transport Coordinator: Supervision and Implementation
- FMC Project Manager : Reporting



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 8
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

WATER

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health & environmental protection by ensuring the adequacy of the EMS, the environmental policy, and operational activities at the IWDF, through a process of continual review.

Management Goal:

To effectively manage and protect groundwater and surface water.

Management Objective:

To ensure groundwater and surface water are monitored and managed to prevent contamination and minimise operational delays.

Management Target:

- No contamination of ground and surface water from waste components
- Minimal operational difficulties and delays due to water

Management Program:

- Operations will not be planned for the wet season.
- Regular weather reports will be obtained during waste disposal periods & site activities scheduled to avoid waste acceptance and burial activities during rainfall.
- The trench and drainage systems will be designed and positioned to avoid the infiltration of surface water and potential groundwater effects.
- When heavy rainfall is expected temporary berms and V drains will be constructed and any waste in the open trench covered with compacted sand and gravel.
- Groundwater monitoring shall be undertaken.
- Water which accumulates in the trench, will be allowed to dry in situ, or if suspected to be contaminated removed and analysed.

Relevant Documents and Procedures:

- Environmental Procedure EP-04: Surface Water Management
- Environmental Procedure EP-03: Environmental Monitoring Management
- Environmental Instruction EI-01: Groundwater Monitoring

Improvement Program:

Nil – current requirements are acceptable.

Forms:

- IWDF Form 01: Chain of Custody Record
- IWDF Form 03: Sampling and Groundwater Monitoring Record
- IWDF Form 21: Groundwater Analysis Register
- IWDF Form 39: Monitoring Register
- Monitoring Bore Location Figure and Site contour maps



Performance Monitoring:

- Ongoing Groundwater Monitoring – every 6 months
- Operational Groundwater Monitoring- immediately before and after an operation

Reporting:

- Annual Performance and Compliance Report: Groundwater monitoring results.
- Operation Close-out report: operation specific surface water management results.

Key Responsibilities:

- Operations Manager- drainage construction and surface water management
- Environmental Manager – groundwater monitoring

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 9
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

WASTE ACCEPTANCE

Environmental, Health and Safety Policy Statement:

- Maintain a strict adherence to the “waste hierarchy” by ensuring that there is no **practically available** reuse, recycling, treatment, destruction, or alternative disposal options in Australia for all wastes accepted for disposal at the IWDF.
- To ensure that only wastes generated in Western Australia are accepted for disposal at the IWDF.

Management Goal:

To assess all waste management options and suitability of the waste, prior to accepting waste for disposal.

Management Objective:

To ensure that only waste that meets the Waste Acceptance Criteria is accepted for disposal at the IWDF.

Management Target:

- All wastes disposed at the IWDF have no other practically available avoidance, waste reduction, treatment, recycling, and reuse alternative at the time of acceptance.
- No wastes generated outside Western Australia will be accepted for disposal at the IWDF,
- Wastes that are in the following categories are not accepted, without prior conditioning, at the IWDF:
 - Free liquid or sludge (except in small volumes)
 - Explosive materials
 - Highly flammable materials
 - Highly reactive or chelating agent materials
 - Compressed gases (greater than 5% by waste volume)
 - Materials that may decompose
 - Toxic, pathogenic, or infectious radioactive materials.



Management Program:

- Ensure all waste owners wishing to dispose of waste at the IWDF provide adequate details of the wastes, in accordance with Waste Acceptance Guidelines.
- Assess a waste owners waste details against the waste acceptance criteria.
- Provide details of the wastes in the Operational and Waste Acceptance Environmental Procedures submitted to the EPA.
- Undertake inspections of the waste.

Improvement Plan:

Continue to monitor the current approach to waste acceptance – to implement a more practical approach to the adherence to the waste hierarchy to ensure there are no inadvertent barriers to appropriate waste being disposed at the IWDF so that all waste that requires disposal can be disposed in a cost-effective manner.

Relevant Documents:

- Guideline: Chemical Waste Acceptance
- Guideline: Radioactive Waste Acceptance
- Operation Procedure: Operation Environmental and Waste Acceptance Procedures
- Management Procedure MP-08: Operational Planning and Management
- Operation Procedure: OP-01 Assessment of applications for disposal
- Operational Procedure OP-02 Operational Administration, Planning and Approvals
- Operational Instruction OI-1 Waste Inspection

Forms:

- Waste Acceptance Proforma.
- IWDF Form 53: Waste Inspection Checklist.
- IWDF Form 55: Waste Assessment Checklist.

Performance Monitoring:

Inspections and assessment of waste

Reporting:

- EPA: Performance and Compliance Report.
- EPA: Close-out Report.
- EPA/Radiological Council: Operation Environmental and Waste Acceptance Procedures.

Key Responsibilities:

- IWDF Project Manager: Ensure wastes for disposal comply with the waste acceptance criteria.
- IWDF Project Manager and Operations Manager : waste inspections.
- Operations Manager: Acceptance of wastes at site.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 10
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

COMMUNITY LIAISON

Environmental, Health and Safety Policy Statement:

Liaise directly with the community on all operational activities & outcomes and ensure that all disposal details & monitoring records/auditing records, are both publicly available & securely stored for future reference.

Management Goal:

To ensure the community is adequately informed regarding the IWDF and its operations.

Management Objective:

To ensure that the community is informed of IWDF activities and has easy access to important documents and information regarding the site, both now and in the future.

Management Target:

- Details of all wastes disposed at the IWDF are readily available to the community.
- Representatives of the community can regularly voice their concerns and discuss issues and changes to the management of the IWDF.
- Community is kept informed with all activities associated with the IWDF.
- Zero complaints from the community.
-

Management Program:

- Maintain a public database / register which provides details of all waste disposed at the IWDF. Publicly available register (Spreadsheet) will be accessible through the Government web page for the IWDF.
- Respond efficiently to complaints and undertake appropriate corrective actions.
- An archiving schedule and record retention table are maintained to ensure that documents are archived to allow future generations access to the information.
- A CLC, containing members of the community meets quarterly to raise community concerns, review important documents & provide input into operational decision making.
-

Improvement Program:

- Place information regarding the IWDF on the Finance website – Guidelines, handbook, brochure etc.
- Publicly available waste disposal spreadsheet.
-

Relevant Documents and Procedures:

- IWDF Waste Database
- Management Procedure: MP-05 Communication and Public Relations
- Management Procedure: MP-07 Management of Records
- IWDF Complaints Register
-

Forms:

- MF-07-1: Archiving schedule
- MF-07-2: Record Retention Table



Performance Monitoring:

- Community Liaison Committee: provides community feedback.
- Management Review Meetings: detail number of complaints and corrective actions.
-

Reporting:

- EPA: Annual Performance and Compliance Report
- Radiological Council: Annual Radiological Report – Rad Council have specified that they will accept submission of Annual PCR in place of a separate Radiological Report.

Key Responsibilities:

FMC Project Manager: implementation and reporting

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 11
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

REVIEW OF MANAGEMENT

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF, through a process of continual review.

Management Goal:

To manage the IWDF and its operations as efficiently and successfully as possible.

Management Objective:

To ensure the IWDF meets all requirements and follows the principle of continual improvement.

Management Target:

- Operation and management of IWDF complies with all regulatory requirements and conditions and commitments.
- EMS successfully mitigates risks and impacts from the site.
- Establish and maintain current best practice for the near surface disposal of hazardous and low-level radioactive materials.

Management Program:

- Undertake regular audits of the management system.
- Hold management review meetings every six months.
- Undertake disposal operation audit of operational procedures.
- Produce an annual performance and compliance report to EPA and Radiological Council for review
- Correct non-conformances as soon as possible & ensure corrective/preventative actions are in place.
- **Regularly review the situation regarding current disposal practices and the awareness of international best practices and advances in technology.**
- Liaise regularly with national and international waste management regulators.

Improvement Plan:

Submit annual PCRs to State Library to fulfil legal deposit requirements. Legal Deposit Regulations 2013 for print and other non-online publications including audio-visual came into force on 1 January 2014.

Relevant Documents and Procedures:

- Management Procedure: MP-11 Management Audits
- Management Procedure: MP-12 Management Review
- Management Procedure: MP-02 Applicable Laws and Regulations
- Management Procedure: MP-13 Control of Non-Conformance & Corrective and Preventative Action
- Emergency Response Procedure ERP-Incident Prevention, Reporting and Investigation
- Facility Management Procedure FMP-04 System Audit
- Facility Management Procedure FMP-05 Control of Non-Conformance

Forms:

- MF-11-3: Audit Report Log
- MF-11-1: Corrective Action Request
- MF-11-2: Internal Management Audit schedule
- MF-11-4: CAR Log
- IWDF Form 10: System Corrective Action Request
- IWDF Form 11: System Corrective Action Register
- IWDF Form 49: Audit Report Register
- IWDF Form 50: Audit Schedule

Performance monitoring:

Management Review Meetings

Reporting:

- Management Review Meetings.
- EPA: Performance and Compliance Report.

Key Responsibilities:

- Finance IWDF Project Manager: implementation
- Finance IWDF Project Director: review of management
- FMC IWDF Project Manager: implementation

Rev	Date	Description	Prepared by:	Checked by:	Approved by:
1	17/09/01	Draft	LCH	LM	
2	4/10/01	Draft	LCH	MJS	
3	1/10/07	Draft	LM	MJS	
4	22/06/09	Draft	LM	MJS/RH	
5	01/07/10	Draft	LM	RH/MJS	
6	04/08/11	Draft	LM	RH	
6.1	14/12/11	Review for PCR	LM	MJS	
7	12/03/12	Review & minor changes to Plans 2, 3 & 4	LM	RH	
7.1	13/09/12	Review & minor changes to Plans 3 & 4	LM	MJS	
8	07/01/13	Review & minor changes to Plans 5 & 6	LM	MJS	
8.1	16/07/13	Review & minor changes to Plans 2, 3 & 4	LM	MJS	
9	15/01/14	Review & minor changes to Plans 2, 3, 4 & 4	LM	MJS	
10	17/04/14	Review and acceptance of past changes	LM	LM & RH	RH
10.1	09/01/15	Review & update to improvement program sections of each plan	LM		
11	25/05/15	Review & update to improvement program sections of each plan and changes to Management program for plans 2a, 2b & 6	LM	LM & RH	
12	24/05/16	Review & update to improvement program sections of each plan and changes to Management program for plans 2b & 6	LM		MJS
13	13/07/16	Review & update to improvement program sections of each plan and changes to Management program for plans 1, 2b & 4	LM		MJS
14	14/02/17	Review & update to improvement program sections of each plan and changes to Management program for plans 1, 2b, 4, 6 & 11.	LM		MJS
15	23/05/17	Update to plan 6 to include OSC and Safety Assessment	LM		MJS
16	6/12/17	Update to improvement plan sections to include outcome as agreed at MRM held 22 June 17	LM		MT
17	27/09/18	Review with consideration to the updated legislation e.g., DG transport, Cops etc, dates for upcoming events updated	LM		
18	10/05/19	Plan 3 updated to include the New (Dec 218) State Emergency Management Plan & Hazmat Plan, Plan 6 updated to include new code, Plan 11 updated improvement request re MRM	LM		
19	15/11/19	Reviewed and updated prior to planned disposal for Feb 2020 only significant change MP04 where advice from DWER regarding clearing permit requirements has been included.	LM		
20	12/05/20	Reviewed/ updated to remove improvement plans that are now completed.	LM	MT	MT
21	22/11/20	Management Plan 11 – change to meeting frequency	LM	MT	MT
22	15/05/21	Review, update to improvement program of Management Plan 6 – MPs reviewed and agreed on at MRM held 3 June 2021, AS /NZS standards checked for currency May 2021.	LM	MT	MT

APPENDIX F
DWER AAC Report



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L8190/2007/1	Licence file number:	2012/006884
Licence holder:	Minister for Works C/- Department of Finance (Western Australia)		
Trading as:	Not applicable		
ACN:	995 933 47728		
Registered address:	Optima Centre, 16 Parkland Road, Osborne Park, 6017		
Reporting period:	01/02/2020 to 31/01/2021		

Section B – Statement of Compliance with Licence Conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">• section C;• section D if required; and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D if required;• section E; and• sign the declaration at Section F.

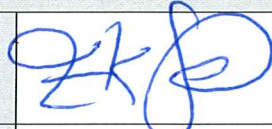
Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
66	Not applicable

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
66	No Applicable

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	2	Date(s) of non-compliance:	Refer below
Details of non-compliance:			
<p>Condition 2 of the Licence states; The licensee shall notify the CEO in writing at least 3 months prior to the delivery of waste to the Intractable Waste Disposal Facility (IWDF), Mt Walton East.</p> <p>The CEO of the Department of Water and Environmental Regulation (DWER) was advised of the disposal operation in writing, on the 12 December 2019. The DWER were notified as soon as it was known a disposal was likely to occur but due to contractual arrangements for the waste storage location it was necessary for the waste to be delivered in February 2020.</p> <p>This was reported in the draft 2019/2020 Performance and Compliance report that has been submitted to the Western Australian Environmental Protection Authority for approval.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
There was no actual or suspected environmental impact.			
Cause (or suspected cause) of non-compliance:			
Due to contractual arrangements at the location where the waste was stored there was a requirement that the waste be removed from the storage location before the end of February 2020. As it was not sensible to transport the waste to another storage location and then to the IWDF within such a short time frame, transport of waste to the IWDF began in early February 2020. This therefore was less than 3 months from the date of notification.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Licence is due for renewal in 2022. A request will be made to modify the licence condition so that at least a 28 working day notification is provided.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and (was			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30 / 09 / 2020	

Section F – Declaration

I/We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular¹. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environment Regulation's (DWER) website.

Signature ² :		Signature:	
Name: (printed)	Emma Savage-Jones	Name: (printed)	
Position:	Director	Position:	
Date:	15.2.2021	Date:	
Seal (if signing under seal):			

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.

APPENDIX G

EPA Endorsement of 2019 – 2020 PCR



Our ref: DWERT6171
Enquiries: Hugh Lance, Ph 6364 6484
Email: hugh.lance@dwer.wa.gov.au

Ms Emma Savage-Jones
IWDF Project Director
Department of Finance
Optima Centre, 16 Parkland Road
OSBORNE PARK WA 6017

Via email: Emma.Savage-Jones@finance.wa.gov.au

Dear Ms Savage-Jones

***INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST –
APPROVAL OF PERFORMANCE AND COMPLIANCE REPORT FOR THE
2020NRT01 DISPOSAL OPERATION***

I refer to the *Performance and Compliance Report Intractable Waste Disposal Facility Mt Walton East July 2019 – June 2020* (September 2020) (PCR) submitted by Aurora Environmental on your behalf for the 2020 disposal operation at the Mt Walton East Intractable Waste Facility, as required by the proponent commitments detailed in Schedule 2 of Ministerial Statement 562.

The Department of Water and Environmental Regulation is satisfied, following advice of the Environmental Protection Authority (Attachment 1), that the PCR is consistent with the requirements of proponent commitment 6-1 of Ministerial Statement 562. In accordance with commitment 6-2 of Ministerial Statement 562, you may now advertise and make the PCR publicly available.

Yours sincerely

Anthony Sutton
Executive Director
EPA SERVICES
for the Chief Executive Officer
under Notice of Delegation dated 3 July 2017

18 May 2021

Attachment 1: EPA Letter

Mr Mike Rowe
Director General
Department of Water and Environmental
Regulation
Locked Bag 10
JOONDALUP DC WA 6919

Our Ref: DWERT6171
Enquiries: Hugh Lance, 6364 6484
Email: hugh.lance@dwer.wa.gov.au

Attention: Anthony Sutton, Executive Director EPA Services

Dear Mr Rowe

**MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY – STATEMENT
562 - REVIEW OF DOCUMENTATION FOR 2020 DISPOSAL OPERATION**

I refer to the *Performance and Compliance Report - Intractable Waste Disposal Facility Mt Walton East July 2019 – June 2020* (September 2020) (PCR) provided by the Department of Finance for the 2020 disposal operation at the Mount Walton Intractable Waste Disposal Facility (IWDF), as required by the proponent commitments contained in schedule 2 of Ministerial Statement 562.

The Environmental Protection Authority (EPA) has considered the advice of the Department of Water and Environmental Regulation on this matter and agrees that the reported potential non-compliance was in relation to a timeframe not being met and does not impact on the objectives detailed in commitment 6-1 of Ministerial Statement 562.

The EPA has considered the advice provided by the Radiological Council of WA and considers the PCR is consistent with the requirements of Proponent Commitment 6 of Ministerial Statement 562. The Department of Finance may now advertise and make the PCR publicly available in accordance with commitment 6-2 of Ministerial Statement 562.

Yours sincerely



Professor Matthew Tonts
CHAIR

4 May 2021

APPENDIX H

Department of Finance R & D Schedule IWDF Extract

Extract from Department of Finance Retention and Disposal Schedule 2018-005 – matters relating directly to the Mount Walton East Intractable Waste Disposal Facility

1	ADVICE	Refer also to General Disposal Authority for State Government Information		
1.2	Advice - File Notification Areas	The Department of Mines and Petroleum (DMP) liaise with Department of Finance regarding any proposed activity around the Mount Walton East Intractable Waste Disposal Facility. The Department of Finance provides advice and suggests conditions for the approval for the third party. The Department of Finance is not advised if any of these conditions are applied to the approval for the third party. The term File Notification Area is used by the DMP for this process.	Destroy	Retain 7 years after date of last action, then Destroy.
2.2	Vesting Orders / Reserve Management Orders	Placing control of reserved Crown Land with the Department (under the Land Administration Act 1997)	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
3	ACQUISITION/DISPOSAL	Refer also to General Disposal Authority for State Government Information		
3.1	Waste Disposal	Records relating to the disposal of radioactive/chemical/hazardous waste at the Mount Walton East Intractable Waste Disposal Facility. For disposal of other hazardous material e.g. asbestos refer to GDASGI.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
6	COMPLIANCE	Refer also the General Disposal Authority for State Government Information		
6.2	Management System - Mount Walton East Intractable Waste Disposal Facility	Refers to all records relating to the Environmental Health and Safety Management System as it relates to the Mount Walton East Intractable Waste Disposal Facility. The management system is a requirement under the Ministerial Statement and is approved by Environmental Protection Authority. While not certified, the management system does meet the requirements of ISO 9001 Quality Management, ISO14001 Environmental Management System and ISAS/NZS 4801 Occupational Health and Safety Management Systems. The system includes but is not limited to procedures, forms, reference material, meetings, reviews, registers and manuals.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
7	CONSTRUCTION / CAPITAL WORKS SURVEYS	Refer also to General Disposal Authority for State Government Information.		
7.1	Surveys - Significant	Records relating to significant Geological, Geotechnical, Geophysical, Aboriginal and Ethnographical surveys where they are kept separately from the Construction Files e.g. surveys relating to the radioactive site at Mt Walton East.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
		Refer also to General Disposal Authority for State Government Information.		
12	ENQUIRIES	Refer also to General Disposal Authority for Government Records		
12.1	Enquiries - Hazardous Waste Disposal	Enquiries relating directly to hazardous waste disposal at Mt Walton East Intractable Waste Disposal Facility.	Required as State archives	Retain 5 years after date of last action, then transfer to the SRO.
18	LICENCES AND PERMITS	Records relating to licences, permits or registrations issued to or from the Department of Finance.		
18.1	Licences and Permits - Significant	Records relating to significant Licences, Permits or Registrations issued to or from the Department of	Required as State archives	Retain 5 years after expiry of approval, then

		<p>Finance.</p> <p>Such as: Permit to store Nuclear Waste, Licence to operate a landfill facility, Registration to store Radioactive Waste, Radiological Council Registration, Australian <u>Safeguards</u> and Non-proliferation Office Permits, Road Use Permits in relation to the Mount Walton East Intractable Waste Disposal Facility</p> <p>See related Activities:</p> <ul style="list-style-type: none"> • Agreements/Contracts 		transfer to the SRO.
20	MAINTENANCE	Refer also to General Disposal Authority for State Government Information		
20.1	Disposal Cell - Shafts and Trenches	Records relating to the maintenance of Disposal Cells at the Mount Walton Intractable Waste Disposal Facility.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
23	MONITORING	<p>Records relating to the activity of monitoring operations and effects of various systems, includes but is not limited to the monitoring of:</p> <ul style="list-style-type: none"> • Groundwater • Capping (process used at Mt Walton East Waste Disposal Facility) • Dust • Rehabilitation • Performance - organisational not personal 		
23.1	Monitoring - Significant	<p>Records relating to monitoring where there may be potential long term impacts on public health and safety, could relate to facility or personnel, e.g. exposure to radiation.</p> <p>Note: Monitoring occurring at the Mt Walton Intractable Waste Disposal Facility is considered significant.</p>	Required as State archives	Retain 5 years after last action, then transfer to the SRO.
27	REPORTING	Refer to General Disposal Authority for State Government Information		
27.1	Reports - Mount Walton East Intractable Waste Disposal Facility	<p>Reports relating specifically to Mount Walton East Intractable Waste Disposal Facility</p> <ul style="list-style-type: none"> • Close-out reports contain details of each specific disposal operation • Performance and Compliance Reports 	Required as State archives	Retain 5 years after date of last action, then transfer to the SRO.
30	OCCUPATIONAL HEALTH AND SAFETY	Also refer to General Disposal Authority for State Government Information		
30.1	Intractable Waste - OHS	Includes but is not limited to: Use, presence, neutralisation and removal, transport, safety precautions; and advice on health risks relating to the radioactive waste site at Mount Walton East	Required as State archives	Retain 5 years after last action, then transfer to the SRO.

APPENDIX I

ASNO Annual Inventory Report

Leanne Morton

From: ASNO Nuclear <nuclear.asno@dfat.gov.au>
Sent: Monday, 6 July 2020 8:39 AM
To: leanne.morton
Cc: Kalman Robertson; Lyndell Evans
Subject: RE: ASNO - action required - Physical Inventory Taking (PIT) as at 30 June 2020 - adjustment to procedure due to COVID-19 [SEC=OFFICIAL:Sensitive]
Attachments: RE Reply requested - Follow up on current and future disposal campaigns [... (128 KB)

OFFICIAL::Sensitive

Dear Leanne,

Thank you for submitting the physical inventory taking for PIN207 Department of Finance, Building Management and Works (WA) – IWDF. ASNO received your PIT on 3 July 2020.

Your PIT indicates that no nuclear material has been received, stored or disposed of at the IWDF during the period 1 July 2019 to 30 June 2020. There are no movements of nuclear material recorded during this period. If this is correct, then you have successfully completed your PIT for 2020.

As discussed in our phone conversation on 16 March (see email attached), if the organization decides that it would like to allow nuclear material to be received, stored or disposed of at the IWDF, please ensure that you complete the appropriate applications forms and submit to ASNO for approval *before* allowing any nuclear material to be received, stored or disposed of at the IWDF.

I understand from our phone conversation on 16 March that you may wish to designate Emma Savage-Jones and Stuart Parr as new contacts for the permit (please correct any misspelling). Please confirm this by reply email. Please also provide email addresses, phone numbers and position titles for Ms Savage-Jones and Mr Parr. Would you like me to also give them access to NUMBAT?

Best regards,
Kalman

Kalman Robertson, PhD

Assistant Director | IAEA Safeguards Section
Australian Safeguards and Non-Proliferation Office

APPENDIX J

ASNO ASO316 Report

Leanne Morton

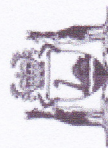
From: Atkinson, Brendon <Brendon.Atkinson@finance.wa.gov.au>
Sent: Tuesday, 16 February 2021 2:36 PM
To: ASNO Nuclear
Cc: Savage-Jones, Emma; leanne.morton
Subject: RE: ASNO Reminder: submission of an ASO316 form (building descriptions and maps) due Monday, 15 March 2021 [SEC=OFFICIAL]
Attachments: ASNO ASO316 report - 16 February 2021.pdf; Regional Location.pdf; Disposal Cell Locations.pdf

Good afternoon Kalman

Please find attached the completed ASO316 form for the Mt Walton East Intractable Waste Disposal Facility (IWDF).

There has been no disposal of nuclear material in the reporting period, with the last disposal containing nuclear material occurring in 2008.

Brendon Atkinson | Contract Manager
Optima Centre, 16 Parkland Road, Osborne Park WA 6017
t 08 6551 1731 | e brendon.atkinson@finance.wa.gov.au
www.finance.wa.gov.au



Government of Western Australia
Department of Finance

*We're working for
Western Australia.*

Acknowledgement of Country The Government of Western Australia acknowledges the traditional custodians of Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of Aboriginal communities and their cultures; and to Elders both past and present.

From: ASNO Nuclear <nuclear.asno@dfat.gov.au>
Sent: Thursday, 4 February 2021 5:10 AM
To: ASNO Nuclear <nuclear.asno@dfat.gov.au>

APPENDIX K

Advertisement for 2019 – 2020 PCR

Public Notices

GENERAL

BANKRUPT ESTATE OF SAMANTHA ANN PASK
ESTATE NUMBER: WA 18/19/0Bankruptcy Act 1966
Section 140, 145

A first and final dividend is to be declared with respect to the above estate. Creditors whose debts or claims have not already been admitted are required to formally prove their debts or claims on or before 18 June 2021. If they do not, they will be excluded from the benefit of the dividend. Dated this 28th day of May 2021
Alice Ruhe
Trustee
SMB Advisory
Level 2, 551 Lt Lonsdale Street
Melbourne VIC 3000

CORE LEARNING FOUNDATION - 2021 AGM

Notice is given that an Annual General Meeting of the members of CoRE Learning Foundation Inc. (Foundation) will be held at 254 Adelaide Tce, Perth and via digital platforms from 3:00pm, local time, 15th of June 2021. AGM Agenda Items as follows.
1. Chair Report 2. Treasurer Report 3. Election of Board and Officers 4. Other Business
Full AGM details can be found online at <https://www.corefoundation.com.au/events/core-2021-agm>

**ROAD TRAFFIC ACT 1974**SECTIONS 80G (3)(E)
AND 80G(4) (B)**NOTICE OF INTENTION TO MAKE APPLICATION TO A COURT FOR AN ORDER TO IMPOUND/CONFISCATE A VEHICLE**

Pursuant to the Road Traffic Act 1974, the Western Australia Police hereby advise the below mentioned vehicles are subject to pending applications to have them impounded or confiscated.

W.A. Registration: 1BPK500
Vehicle: Mazda 6A
Magistrates Court: Midland

W.A. Registration: 1GFR342
Vehicle: BMW E70
Magistrates Court: Perth

W.A. Registration: 1EZR276
Vehicle: Holden Berlina
Magistrates Court: Armadale

Any person with an interest in any of these vehicles who wishes to make a submission to the Court regarding the application to impound or confiscate the vehicles is advised to contact the relevant Magistrates Court Registry.

Chris Dawson
Commissioner of Police

**NOTICE OF INTENTION**

I, WRIGHT, Jonathan of Sharpe Ave, Pegs Creek, WA hereby give notice of my intention to apply to be licensed as a secondhand dealer for the benefit of C.D. Dodd Scrap Metal Recyclers of Lot 109 Bedrock Turn, Gap Ridge, WA.

NOTICE OF INTENTION

I, ROBINSON, Kenneth of Dugan Street, Kalgoorlie WA hereby give notice of my intention to apply to be licensed as a secondhand dealer for the benefit of C.D. Dodd Scrap Metal Recyclers of 1 Coath Road, West Kalgoorlie WA

DECEASED ESTATES**DECEASED ESTATE - DENNIS JOHN TRAVIS**

Notice under the Trustees Act 1962 to Creditors and Claimants of Dennis John Travis, retired steel worker, late of 14 Osprey Drive, Yangebup 6164, WA who died on 30 November 2020, deceased. Creditors and other persons having claims to which Section 63 of the Trustees Act 1962 relates in respect of the estate of the deceased, are required by the Administrators of the estate, Steven Wilfred Travis of 53 Belmont Avenue Upwey Victoria 3158 to send particulars of their claims to them at the address stated herein within 30 days of this notice, after which date the Administrators may convey or distribute the assets, having regard only to the claims of which they then have notice.

TRUSTEES ACT 1962

In the estate of **PETER GAVRANICH** late of Regis Greenmount, 22 Coongan Avenue, Greenmount, Western Australia Teacher/Deputy Principal, deceased. CREDITORS and other persons having claims to which Section 63 of the Trustees Act 1962 relates) in respect of the estate of the abovenamed deceased who died on 10 January 2020 are required by the personal representative **JILLIAN MARGARET NEALE** of C/- Greenstone Legal, Level 1, 32 Delhi Street, West Perth WA 6005 to send particulars of their claims to her by the 2nd day of July 2021 after which date the personal representative may convey or distribute the assets having regard only to the claims of which she then has notice.

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DOF_2540

PUBLIC NOTICES

Government of Western Australia
Department of Water and Environmental Regulation

NOTIFICATION OF APPLICATIONS RECEIVED FOR WORKS APPROVALS, LICENCES, CLEARING PERMITS AND AMENDMENTS AND AVAILABLE FOR PUBLIC SUBMISSIONS AND/OR REGISTRATIONS OF INTEREST

In addition to this advertisement, the Department of Water and Environmental Regulation maintains a register of current applications which are open for comment on the Department's website (www.dwer.wa.gov.au). The register contains information on applications and the submission closing date for all comments. To receive notification of updates to the register, please subscribe at www.der.wa.gov.au/about-us/40-email-alert.

APPLICATIONS FOR WORKS APPROVALS AND NEW LICENCES

Putrescible Landfill Site: Paddington Gold Pty Ltd (Rosepit), BOULDER (W6540/2021/1)

Putrescible Landfill Site: Paddington Gold Pty Ltd (Ora Banda), BOULDER (W6541/2021/1)

Putrescible Landfill Site: Paddington Gold Pty Ltd (Bullant Gold Mine), BOULDER (W6542/2021/1)

Class II or III putrescible landfill site; Mine dewatering: Salt Lake Mining Pty Ltd (Beta Hunt Mine), KAMBALDA EAST (L8893/2015/2) **Renewal**

Food processing: Rex Henry Rowles and Simone Louisa Rowles (Mortlock Malt - Goomaling), KARRANADGIN (W6544/2021/1)

Submissions may be forwarded to the Department of Water and Environmental Regulation, Locked Bag 10, Joondalup DC WA 6850 or by email info@dwer.wa.gov.au**NOTIFICATION OF WORKS APPROVALS, LICENCES, CLEARING PERMITS AND NOTICES GRANTED, AMENDED OR GIVEN AND AVAILABLE FOR PUBLIC APPEAL**

The Department of Water and Environmental Regulation updates a register of current decisions which are open to appeal on the Department's website (www.dwer.wa.gov.au). The register provides the decision dates of all works approvals, licences, and notices which are granted, amended or given and information on lodging appeals. To receive notification of updates to the register, please subscribe at www.der.wa.gov.au/about-us/40-email-alert

Your views are welcome on any licensing matters.
Internet: www.dwer.wa.gov.au Email: info@dwer.wa.gov.au

Date 31 MAY 2021



Government of Western Australia
Department of Finance

INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST - 2020 DISPOSAL OPERATION

The Performance and Compliance report for the 2020 disposal operation at the Intractable Waste Disposal Facility, Mt Walton East (IWDF) has been endorsed by the Environmental Protection Authority (EPA) as being consistent with the requirements of Proponent Commitment 6 of Ministerial Statement 562.

Persons requesting a copy of the endorsed Performance and Compliance Report should email IWDF-MountWalton@finance.wa.gov.au

**EXTRACT OF ORDER FOR TAKING LAND**

LAND ADMINISTRATION ACT 1997

(Section 178(1)(b)(ii) and (c))



APPENDIX L

2020NRT01 Disposal – Extract from IWDF Waste Inventory Database

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
1	2020NRT01 Disposal Operation Public Data - Intractable																	
2	Database ID Number	Disposal Cell ID No.	Cell Type	Survey Coordinates for Disposal Cell Fenced Compound	Disposal Cell Dimensions	Waste Type	Waste Consignor	Package Identification Number	Package Type	Package Dimensions	Consignment / Delivery / Load ID	Intractable Chemical or Radioactive Component	Physical form of waste prior to conditioning	Disposal Date	Location in Disposal Cell	Depth to Waste (m)	Date of delivery to IWDF	Package Description
3	21566	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	1	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
4	21584	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	10	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport.
5	21766	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	100	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
6	21768	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	101	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
7	21770	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	102	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
8	21772	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	103	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
9	21774	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	104	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
10	21776	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	105	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
11	21778	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	106	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
12	21780	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	107	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
13	21782	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	108	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
14	21784	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	109	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
15	21586	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	11	Water pipe	Not recorded	002	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	04/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
16	21786	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	110	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
17	21788	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	111	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
18	21790	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	112	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
19	21792	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	113	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
20	21794	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	114	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
21	21796	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	115	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
22	21798	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	116	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
23	21800	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	117	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
24	21802	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	118	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
25	21804	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	119	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
26	21588	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	12	Water pipe	Not recorded	002	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	04/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
27	21806	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	120	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
28	21966	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	121	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
29	21968	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	122	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
30	21970	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	123	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
31	21972	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	124	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
32	21974	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	125	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
33	21976	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	126	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
34	21978	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	127	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
35	21980	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	128	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
36	21982	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	129	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
37	21590	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	13	Water pipe	Not recorded	002	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	04/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
38	21984	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	130	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
39	21986	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	131	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
40	21988	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	132	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
41	21990	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	133	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
42	21992	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	134	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
43	21994	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	135	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
44	21996	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	136	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
45	21998	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	137	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
46	22000	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	138	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
47	22002	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	139	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
48	21604	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	14	Water pipe	Not recorded	003	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	05/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
49	22004	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	140	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
50	22006	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	141	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
51	22008	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	142	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
52	22010	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	143	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
53	22012	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	144	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
54	22014	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	145	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
55	22016	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	146	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
56	22018	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	147	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
57	22020	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	148	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
58	22022	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	149	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
59	21606	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	15	Water pipe	Not recorded	003	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	05/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
60	22024	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	150	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
61	22026	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	151	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
62	22028	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	152	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
63	22030	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	153	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
64	22032	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	154	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
65	22034	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	155	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
66	22036	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	156	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
67	22038	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	157	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
68	22040	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	158	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
69	22042	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	159	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
70	21592	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	16	Water pipe	Not recorded	002	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	04/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
71	22044	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	160	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
72	22046	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	161	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
73	22048	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	162	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
74	22050	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	163	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
75	22052	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	164	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
76	22054	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	165	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
77	22056	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	166	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
78	22058	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	167	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
79	22060	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	168	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
80	22062	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	169	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
81	21594	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	17	Water pipe	Not recorded	002	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	04/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
82	22064	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	170	Water pipe	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
83	22526	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	171	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
84	22528	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	172	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
85	22530	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	173	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
86	22532	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	174	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
87	22534	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	175	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
88	22536	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	176	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
89	22538	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	177	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
90	22540	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	178	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
91	22542	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	179	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
92	21596	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	18	Water pipe	Not recorded	003	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	05/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
93	22544	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	180	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
94	22546	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	181	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
95	22548	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	182	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
96	22550	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	183	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
97	22552	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	184	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
98	22554	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	185	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
99	22556	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	186	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
100	22558	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	187	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
101	22560	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	188	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
102	22562	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	189	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
103	21598	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	19	Water pipe	Not recorded	003	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	05/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
104	22564	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	190	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
105	22566	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	191	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
106	22568	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	192	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
107	22570	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	193	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
108	22572	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	194	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
109	22574	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	195	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
110	22576	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	196	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
111	22578	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	197	Water pipe	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
112	22762	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	198	Water pipe	Not recorded	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	25/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
113	22764	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	199	Water pipe	Not recorded	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	25/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
114	21568	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	2	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
115	21600	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	20	Water pipe	Not recorded	003	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	05/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
116	22766	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	200	Water pipe	Not recorded	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	25/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
117	22768	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	201	Water pipe	Not recorded	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	25/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
118	22770	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	202	Water pipe	Not recorded	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	25/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
119	22772	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	203	Water pipe	Not recorded	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	25/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
120	21602	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	21	Water pipe	Not recorded	003	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	05/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
121	21608	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	22	Water pipe	Not recorded	004	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
122	21610	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	23	Water pipe	Not recorded	004	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
123	21612	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	24	Water pipe	Not recorded	004	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
124	21614	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	25	Water pipe	Not recorded	004	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
125	21616	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	26	Water pipe	Not recorded	004	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
126	21618	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	28	Water pipe	Not recorded	004	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
127	21620	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	29	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
128	21570	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	3	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
129	21622	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	30	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
130	21624	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	31	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
131	21626	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	32	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
132	21628	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	33	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
133	21630	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	34	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
134	21632	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	35	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
135	21634	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	36	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
136	21636	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	37	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
137	21638	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	38	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
138	21640	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	39	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
139	21572	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	4	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
140	21642	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	40	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
141	21644	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	41	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
142	21646	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	42	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
143	21648	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	43	Water pipe	Not recorded	005	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	10/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
144	21666	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	44	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
145	21678	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	45	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
146	21668	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	46	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
147	21680	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	47	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
148	21670	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	48	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
149	21650	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	49	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
150	21574	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	5	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
151	21652	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	50	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
152	21654	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	51	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
153	21656	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	52	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W	
154	21658	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		53	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
155	21660	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		54	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
156	21662	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		55	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
157	21664	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		56	Water pipe	Not recorded	006	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	13/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
158	21672	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		57	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
159	21674	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		58	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
160	21676	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		59	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
161	21576	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		6	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport.
162	21682	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		60	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
163	21684	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		61	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
164	21686	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group		62	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB)	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
165	21688	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	63	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
166	21690	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	64	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
167	21692	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	65	Water pipe	Not recorded	007	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	15/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
168	21696	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	66	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
169	21698	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	67	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
170	21700	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	68	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
171	21714	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	69	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
172	21578	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	7	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
173	21716	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	70	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
174	21718	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	71	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
175	21702	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	72	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
176	21704	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	73	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
177	21706	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	74	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
178	21708	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	75	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
179	21710	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	76	Water pipe	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
180	21720	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	77	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
181	21722	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	78	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
182	21724	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	79	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
183	21580	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	8	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
184	21726	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	80	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
185	21728	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	81	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
186	21730	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	82	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
187	21732	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	83	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
188	21734	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	84	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
189	21736	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	85	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
190	21738	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	86	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
191	21740	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	87	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
192	21742	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	88	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
193	21744	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	89	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
194	21582	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	9	Water pipe	Not recorded	001	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	03/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
195	21746	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	90	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
196	21748	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	91	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
197	21750	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	92	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
198	21752	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	93	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
199	21754	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	94	Water pipe	Not recorded	010	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	21/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
200	21756	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	95	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
201	21758	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	96	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
202	21760	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	97	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
203	21762	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	98	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
204	21764	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	99	Water pipe	Not recorded	011	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	06/03/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
205	21694	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	Not recorded	Water pipe	Not recorded	008	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	Water pipes coated with bituminous wrap double wrapped in plastic for transport
206	21712	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	SC00	Sea container	Not recorded	009	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 1 of 2	8.5	19/02/2020	One six metre sea container content comprising mostly bulka bags containing Tyveks and other bituminous contaminated clothing.
207	22336	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	005 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
208	22338	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	006 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
209	22340	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	007 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
210	22342	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	008 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
211	22344	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	013 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
212	22346	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	014 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
213	22348	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	015 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
214	22350	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	016 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
215	22352	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	021 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
216	22354	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	022 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
217	22356	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	023 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
218	22358	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	024 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
219	22776	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	1 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
220	22786	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	10 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
221	21928	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	100 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
222	21848	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	101 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
223	21930	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	102 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
224	21932	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	103 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
225	21934	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	104 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
226	21850	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	105 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
227	21936	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	106 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
228	21938	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	107 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
229	21940	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	108 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
230	22086	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	109 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
231	22788	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	11 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
232	22088	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	110 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
233	22090	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	111 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
234	22092	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	112 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
235	21852	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	113 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
236	21942	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	114 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
237	21944	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	115 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
238	21946	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	116 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
239	21854	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	117 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
240	21948	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	118 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
241	21950	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	119 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
242	22790	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	12 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
243	21952	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	120 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
244	21856	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	121 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
245	21954	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	122 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
246	21956	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	123 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
247	21958	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	124 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
248	21858	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	125 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
249	21960	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	126 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
250	21962	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	127 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
251	21964	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	128 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
252	22118	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	129 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
253	22120	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	130 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
254	22122	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	131 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
255	22124	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	132 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
256	22862	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	133 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
257	22864	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	134 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
258	22866	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	135 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
259	22868	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	136 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
260	22126	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	137 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
261	22128	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	138 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
262	22130	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	139 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
263	22132	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	140 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
264	22134	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	141 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
265	22136	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	142 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
266	22138	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	143 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
267	22140	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	144 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
268	22142	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	145 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
269	22144	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	146 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
270	22146	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	147 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
271	22148	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	148 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
272	22150	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	149 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
273	22152	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	150 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
274	22154	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	151 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
275	22156	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	152 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
276	22158	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	153 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
277	22160	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	154 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
278	22162	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	155 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
279	22164	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	156 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
280	22166	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	157 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
281	22168	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	158 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
282	22170	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	159 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
283	22172	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	160 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
284	22094	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	161 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
285	22224	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	161A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
286	22096	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	162 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
287	22226	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	162A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
288	22098	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	163 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
289	22228	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	163A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
290	22100	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	164 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
291	22230	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	164A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
292	22102	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	165 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
293	22232	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	165A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
294	22104	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	166 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
295	22234	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	166A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
296	22106	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	167 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
297	22236	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	167A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
298	22108	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	168 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
299	22238	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	168A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
300	22110	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	169 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
301	22240	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	169A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
302	22792	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	17 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
303	22112	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	170 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
304	22242	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	170A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
305	22114	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	171 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
306	22244	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	171A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
307	22116	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	172 (drum)	205 L steel drum	580mm in diameter and 880mm high	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
308	22246	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	172A (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
309	22248	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	173 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
310	22250	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	174 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
311	22252	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	175 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
312	22254	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	176 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
313	22256	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	177 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
314	22258	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	178 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
315	22260	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	179 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
316	22794	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	18 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
317	22262	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	180 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
318	22264	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	181 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
319	22266	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	182 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
320	22268	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	183 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
321	22270	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	184 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
322	22272	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	185 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
323	22274	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	186 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
324	22276	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	187 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
325	22278	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	188 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
326	22280	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	189 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
327	22796	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	19 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
328	22282	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	190 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
329	22284	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	191 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
330	22286	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	192 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
331	22288	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	193 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
332	22290	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	194 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
333	22292	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	195 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
334	22294	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	196 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
335	22296	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	197 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
336	22298	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	198 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
337	22300	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	199 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
338	22778	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	2 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
339	22798	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	20 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
340	22302	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	200 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
341	22304	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	201 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
342	22306	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	202 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
343	22308	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	203 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
344	22310	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	204 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
345	22312	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	205 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
346	22314	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	206 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
347	22316	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	207 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
348	22318	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	208 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
349	22320	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	209 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
350	22322	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	210 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
351	22324	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	211 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
352	22326	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	212 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
353	22328	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	213 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
354	22330	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	214 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
355	22332	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	215 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
356	22334	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	216 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
357	22178	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	217 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
358	22180	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	218 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
359	22182	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	219 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
360	22184	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	220 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
361	22186	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	221 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
362	22188	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	222 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
363	22190	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	223 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
364	22194	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	225 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
365	22196	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	226 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
366	22198	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	227 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
367	22200	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	228 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
368	22202	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	229 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
369	22204	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	230 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
370	22206	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	231 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
371	22208	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	232 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
372	22210	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	233 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
373	22212	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	234 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
374	22214	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	235 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
375	22216	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	236 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
376	22218	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	237 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
377	22220	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	238 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
378	22222	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	239 (drum)	205 L steel drum	580mm in diameter and 880mm high	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
379	22360	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	240 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
380	22362	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	241 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
381	22364	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	242 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
382	22366	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	243 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
383	22368	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	244 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
384	22370	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	245 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
385	22372	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	246 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
386	22374	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	247 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
387	22376	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	248 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
388	22580	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	249 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
389	22800	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	25 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
390	22582	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	250 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
391	22584	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	251 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
392	22586	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	252 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
393	22588	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	253 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
394	22590	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	254 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
395	22592	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	255 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
396	22594	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	256 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
397	22596	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	257 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
398	22598	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	258 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
399	22600	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	259 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
400	22802	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	26 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
401	22602	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	260 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
402	22604	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	261 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
403	22606	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	262 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
404	22608	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	263 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
405	22610	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	264 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
406	22612	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	265 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
407	22622	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	266 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
408	22624	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	267 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
409	22626	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	268 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
410	22628	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	269 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
411	22804	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	27 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
412	22630	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	270 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
413	22632	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	271 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
414	22634	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	272 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
415	22640	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	273 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
416	22642	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	274 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
417	22378	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	275 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
418	22380	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	276 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
419	22382	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	277 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
420	22384	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	278 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
421	22386	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	279 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
422	22806	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	28 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
423	22388	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	280 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
424	22390	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	281 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
425	22392	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	282 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
426	22394	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	283 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
427	22396	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	284 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
428	22398	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	285 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
429	22400	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	286 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
430	22402	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	287 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
431	22404	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	288 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
432	22406	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	289 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
433	22808	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	29 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
434	22408	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	290 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
435	22410	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	291 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
436	22412	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	292 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
437	22414	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	293 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
438	22416	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	294 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
439	22418	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	295 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
440	22420	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	296 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
441	22422	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	297 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
442	22424	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	298 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
443	22426	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	299 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
444	22780	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	3 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
445	22810	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	30 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
446	22428	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	300 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
447	22430	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	301 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
448	22432	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	302 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
449	22434	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	303 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
450	22436	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	304 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
451	22438	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	305 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
452	22440	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	306 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
453	22442	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	307 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
454	22444	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	308 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
455	22446	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	309 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
456	22812	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	31 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
457	22448	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	310 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
458	22450	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	311 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
459	22452	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	312 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
460	22454	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	313 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
461	22456	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	314 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
462	22458	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	315 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
463	22460	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	316 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
464	22462	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	317 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
465	22464	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	318 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
466	22466	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	319 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
467	22814	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	32 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
468	22468	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	320 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
469	22470	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	321 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
470	22472	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	322 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
471	22474	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	323 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
472	22476	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	324 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
473	22478	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	325 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
474	22480	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	326 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
475	22482	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	327 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
476	22484	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	328 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
477	22486	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	329 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
478	22816	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	33 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
479	22488	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	330 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
480	22490	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	331 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
481	22492	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	332 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
482	22494	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	333 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
483	22496	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	334 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
484	22498	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	335 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
485	22500	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	336 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
486	22502	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	337 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
487	22504	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	338 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
488	22506	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	339 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
489	22818	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	34 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
490	22508	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	340 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
491	22510	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	341 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
492	22512	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	342 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
493	22514	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	343 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
494	22516	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	344 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
495	22518	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	345 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
496	22520	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	346 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
497	22522	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	347 (drum)	205 L steel drum	580mm in diameter and 880mm high	016	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	19/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
498	22656	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	348 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
499	22658	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	349 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
500	22820	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	35 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
501	22660	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	350 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
502	22662	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	351 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
503	22670	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	352 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
504	22672	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	353 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
505	22674	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	354 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
506	22676	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	355 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
507	22678	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	356 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
508	22680	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	357 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
509	22682	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	358 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
510	22684	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	359 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
511	22822	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	36 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
512	22686	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	360 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
513	22688	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	361 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
514	22690	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	362 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
515	22692	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	363 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
516	22694	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	364 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
517	22696	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	365 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
518	22698	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	366 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
519	22700	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	367 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
520	22702	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	368 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
521	22704	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	369 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
522	22636	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	37 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
523	22706	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	370 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
524	22708	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	371 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
525	22710	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	372 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
526	22712	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	373 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
527	22714	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	374 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
528	22716	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	375 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
529	22718	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	376 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
530	22720	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	377 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
531	22722	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	378 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
532	22724	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	379 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
533	22638	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	38 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
534	22726	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	380 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
535	22728	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	381 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
536	22730	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	382 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
537	22732	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	383 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
538	22734	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	384 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
539	22736	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	385 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
540	22738	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	386 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
541	22740	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	387 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
542	22742	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	388 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
543	22744	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	389 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
544	22824	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	39 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
545	22746	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	390 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
546	22748	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	391 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
547	22750	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	392 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
548	22752	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	393 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
549	22754	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	394 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
550	22756	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	395 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
551	22758	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	396 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
552	22760	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	397 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
553	22644	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	398 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
554	22646	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	399 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
555	22782	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	4 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
556	22826	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	40 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
557	22648	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	400 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
558	22650	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	401 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
559	22652	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	402 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
560	22654	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	403 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
561	22828	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	41 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
562	22870	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	415 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
563	22872	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	416 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
564	22874	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	417 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
565	22876	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	418 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
566	22878	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	419 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
567	22830	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	42 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
568	22880	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	420 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
569	22882	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	421 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
570	22884	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	422 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
571	22886	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	423 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
572	22888	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	424 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
573	22890	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	425 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
574	22892	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	426 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
575	22894	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	427 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
576	22896	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	428 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
577	22898	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	429 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
578	22832	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	43 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
579	22900	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	430 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
580	22902	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	431 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
581	22904	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	432 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
582	22906	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	433 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
583	22908	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	434 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
584	22910	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	435 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
585	22912	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	436 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
586	22914	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	437 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
587	22916	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	438 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
588	22918	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	439 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
589	22834	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	44 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
590	22920	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	440 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
591	22922	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	441 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
592	22924	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	442 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
593	22926	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	443 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
594	22928	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	444 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
595	22930	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	445 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
596	22932	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	446 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
597	22934	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	447 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
598	22936	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	448 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
599	22938	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	449 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
600	22836	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	45 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
601	22940	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	450 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
602	22942	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	451 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
603	22838	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	46 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
604	22840	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	47 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
605	22842	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	48 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
606	22664	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	49 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
607	22844	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	50 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
608	22666	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	51 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
609	22668	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	52 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
610	22846	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	53 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
611	22848	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	54 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
612	22850	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	55 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
613	22852	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	56 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
614	22614	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	57 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
615	22616	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	58 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
616	22618	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	59 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
617	22620	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	60 (drum)	205 L steel drum	580mm in diameter and 880mm high	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
618	22854	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	61 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
619	22856	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	62 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
620	22858	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	63 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
621	22860	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	64 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
622	21808	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	65 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
623	21876	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	66 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
624	21878	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	67 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
625	21880	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	68 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
626	21810	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	69 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
627	21882	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	70 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
628	21884	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	71 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
629	21886	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	72 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
630	21818	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	73 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
631	21888	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	74 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
632	21890	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	75 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
633	21892	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	76 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
634	21820	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	77 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
635	21894	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	78 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
636	21896	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	79 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
637	21898	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	80 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
638	21822	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	81 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
639	21900	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	82 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
640	21902	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	83 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
641	21904	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	84 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
642	21824	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	85 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
643	21906	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	86 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
644	21908	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	87 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
645	21910	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	88 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
646	21826	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	89 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
647	22784	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	9 (drum)	205 L steel drum	580mm in diameter and 880mm high	018	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	25/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
648	21912	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	90 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
649	21914	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	91 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
650	21916	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	92 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
651	21828	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	93 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
652	21918	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	94 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
653	21920	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	95 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
654	21922	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	96 (drum)	205 L steel drum	580mm in diameter and 880mm high	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	205 L steel drum containing fragmented bituminous pipe coating secured on pallet
655	21846	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	97 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
656	21924	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	98 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
657	21926	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	99 (drum)	205 L steel drum	580mm in diameter and 880mm high	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	205 L steel drum filled to capacity with fragmented bituminous pipe coating.
658	21860	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-01	Intermediate bulk container (IBC)	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
659	21862	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-02	Intermediate bulk container (IBC)	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
660	21864	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-03	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
661	22072	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-04	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
662	21866	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-05	Intermediate bulk container (IBC)	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
663	21868	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-06	Intermediate bulk container (IBC)	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
664	21870	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-07	Intermediate bulk container (IBC)	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
665	21872	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-08	Intermediate bulk container (IBC)	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
666	22174	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-09	Intermediate bulk container (IBC)	Not recorded	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
667	22176	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-10	Intermediate bulk container (IBC)	Not recorded	015	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	13/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
668	21830	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-11	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.
669	21832	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-12	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
670	21834	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-13	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.
671	22074	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-14	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
672	22524	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-15	Intermediate bulk container (IBC)	Not recorded	017	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	21/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
673	21836	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-17	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.
674	21838	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-18	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.
675	21840	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-19	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.
676	21842	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-20	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.
677	21844	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-21	Intermediate bulk container (IBC)	Not recorded	012	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	08/03/2020	Intermediate bulk container (IBC) filled to capacity with fragmented bituminous pipe coating.
678	21874	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-22	Intermediate bulk container (IBC)	Not recorded	013	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	10/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
679	22076	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-23	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
680	22078	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-24	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.

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	C	D	E	F	G	I	J	L	M	N	P	Q	R	S	T	U	V	W
681	22080	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-25	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
682	22082	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-26	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
683	22084	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-27	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
684	22066	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-28	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
685	22068	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-29	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.
686	22070	2020NRT01	Trench	E233190.6, N6637024.2; E234350.6, N6636984.2; E234350.6, N6633064.2; E233190.6, N6633064.2;	66 m long, 12.5 m wide, 14 m deep	Chemical	Merit Consulting Group	I-30	Intermediate bulk container (IBC)	Not recorded	014	PAH (Benzo(a), pyrene (BaP), PCB	Solid	31/05/2020	Layer 2 of 2	8.5	12/03/2020	IBC filled to capacity with fragmented bituminous pipe coating.

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	X	Y	Z	AA	AB	AC	AE	BA
1	Intractable Waste Disposal Facility							
2	Conditioning of Waste	Description of Waste	Weight of waste & packaging (kg)	Comments / Notes	Other Chemical Constituents	Common Name or Chemical Trade Name	Estimate of quantity of Chemical Waste (kg)	Source of Information
3	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
4	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
5	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
6	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
7	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
8	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
9	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
10	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
11	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
12	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	857.14		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.

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	X	Y	Z	AA	AB	AC	AE	BA
79	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 13 consisted of drums, intermediate bulk containers (IBCs) and pipes - only total weight of consignment was recorded	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
80	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 13 consisted of drums, intermediate bulk containers (IBCs) and pipes - only total weight of consignment was recorded	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
81	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
82	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 13 consisted of drums, intermediate bulk containers (IBCs) and pipes - only total weight of consignment was recorded	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
83	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 17 delivery checklist recorded 27 pipes, pipe numbering was not recorded on the checklist. To be consistent with previous pipe deliveries the 27 pipes have been allocated numbers 171 - 197. Weight of pipes for consignment 17 was not recorded on checklist.	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
84	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 17 delivery checklist recorded 27 pipes, pipe numbering was not recorded on the checklist. To be consistent with previous pipe deliveries the 27 pipes have been allocated numbers 171 - 197. Weight of pipes for consignment 17 was not recorded on checklist.	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
85	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 17 delivery checklist recorded 27 pipes, pipe numbering was not recorded on the checklist. To be consistent with previous pipe deliveries the 27 pipes have been allocated numbers 171 - 197. Weight of pipes for consignment 17 was not recorded on checklist.	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
86	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 17 delivery checklist recorded 27 pipes, pipe numbering was not recorded on the checklist. To be consistent with previous pipe deliveries the 27 pipes have been allocated numbers 171 - 197. Weight of pipes for consignment 17 was not recorded on checklist.	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
87	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 17 delivery checklist recorded 27 pipes, pipe numbering was not recorded on the checklist. To be consistent with previous pipe deliveries the 27 pipes have been allocated numbers 171 - 197. Weight of pipes for consignment 17 was not recorded on checklist.	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	X	Y	Z	AA	AB	AC	AE	BA
198	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	2,444.44		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
199	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	2,444.44		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
200	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
201	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
202	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
203	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
204	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1,666.67		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
205	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Water pipe waste was delivered from Burracoppin without IWDF packaging and loading checklist. A total 248 lineal metres of water pipe was delivered.	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
206	Water pipes coated with bituminous wrapping material were double wrapped in plastic for transport. After placing in the trench the pipes were crushed to remove voids.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	10,000		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
207	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to a pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
208	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to a pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	X	Y	Z	AA	AB	AC	AE	BA
275	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	250		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
276	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	325		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
277	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	325		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
278	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	325		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
279	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	325		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
280	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	312.5		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
281	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	312.5		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
282	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	312.5		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
283	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	312.5		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
284	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to the pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	300	Drum number 161 was also delivered in consignment 015. Weight of drum is different, It was assumed an error was made in drum numbering so drum 161 for consignment 015 has been recorded as 161A (drum).	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
285	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to the pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	312.5	Drum number 161 was delivered in consignment 014. Weight of drum is different, It was assumed an error was made in drum numbering so drum 161 for consignment 015 has been recorded as 161A (drum).	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	X	Y	Z	AA	AB	AC	AE	BA
307	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	250	Drum number 172 was delivered in consignment 015. Weight of drum is different, It was assumed an error was made in drum numbering so drum 172 for consignment 015 has been recorded as 172A (drum).	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
308	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33	Drum number 172 was also delivered in consignment 014. Weight of drum is different, It was assumed an error was made in drum numbering so drum 172 for consignment 015 has been recorded as 172A (drum).	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
309	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
310	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
311	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
312	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
313	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
314	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
315	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
316	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Four drums were secured to a pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
317	205 L steel drum filled to capacity with fragmented bituminous pipe coating. Three drums were secured to each pallet.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	333.33		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	X	Y	Z	AA	AB	AC	AE	BA
670	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	360	IBC weight averaged across total for consignment	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
671	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1650		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
672	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1600		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
673	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	360	IBC weight averaged across total for consignment	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
674	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	360	IBC weight averaged across total for consignment	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
675	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	360	IBC weight averaged across total for consignment	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
676	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	360	IBC weight averaged across total for consignment	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
677	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	360	IBC weight averaged across total for consignment	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
678	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	Not recorded	Consignment 13 consisted of drums, intermediate bulk containers (IBCs) and pipes - only total weight of consignment was recorded	Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
679	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1850		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
680	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1600		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.

EXTRACT FROM IWDF WASTE INVENTORY DATABASE

	X	Y	Z	AA	AB	AC	AE	BA
681	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1750		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
682	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	2000		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
683	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	800		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
684	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1450		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
685	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1000		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.
686	IBC filled to capacity with fragmented bituminous pipe coating.	Bituminous wrapping material containing PAHs (Benzo(a), Pyrene(BaP), PCBs and asbestos	1550		Asbestos	N/A	Not recorded	Department of Finance (2020) Performance and Compliance Report Intractable Waste Disposal Facility, Mt Walton East, July 2019 - June 2020. Report prepared by Aurora Environmental, September 2020 (DFI2020-001-OPCR_LM_Revision 1). Close-out Report, Disposal of Chemical Wastes at the Intractable Waste Disposal Facility, Waste Disposal Operation 2020NRT01 is included as Appendix E.

APPENDIX M

2020 - 2021 CLC Minutes

Intractable Waste Disposal Facility (IWDF), Mount Walton - East Community Liaison Committee (CLC) Quarterly Meeting

Final

Chairperson:	Emma Savage-Jones	Date & Time:	1 October 2020 10.10 am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
		Meeting No.	2020/21 Q1

Attendees:		
Jan McLeod	(JMcl)	Coolgardie Community Representative
Anna Killigrew	(AK)	Coolgardie Community Representative
Mal Cullen	(MC)	President, Shire of Coolgardie
Emma Savage-Jones	(ESJ)	IWDF Project Director, Department of Finance (Chairperson)
Brendon Atkinson	(BA)	IWDF Contract Manager, Department of Finance
Leanne Morton	(LM)	IWDF FMC Project Manager
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
David Williams	(DW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Grayson Hindmarsh	(GH)	Executive Manager Regulatory Services, Shire of Yilgarn
Bryan Close	(BC)	Deputy Shire President, Shire of Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn

Apologies		
James Trail	(JT)	CEO, Shire of Coolgardie
Tracey Rathbone	(TR)	Deputy President, Shire of Coolgardie
Lynn Webb	(LW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Peter Harrison	(PH)	Coolgardie Community Representative
Peter Clarke	(PC)	CEO, Shire of Yilgarn

Observer
Slade Greenaway representing Tellus Holdings

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>ESJ declared the meeting open at 10.10 am</p> <p>ESJ acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>ESJ introduced herself and explained her role as the Intractable Waste Disposal Facility (IWDF) Project Director, representing the Department of Finance, the Proponent for the IWDF, Mount Walton East.</p> <p>ESJ welcomed all committee members present and thanked them for making the time to attend the meeting.</p> <p>ESJ thanked the public observer, Slade Greenaway for attending the meeting.</p> <p>ESJ also advised that observers are not able to participate in the meeting, however that there would be an opportunity at the end of the meeting for observers to ask any questions related to the IWDF.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p>	
4.0	<p>Previous Minutes</p> <p>Draft minutes, including the presentation by the IWDF Radiation Safety Officer, from the previous meeting, held 24 June 2020, were distributed for comment via email to the CLC (with hardcopy to Jan McLeod) on 21 August 2020. No feedback or comment was received.</p> <p>ESJ asked the committee if there were any further amendments to the draft minutes.</p> <p>No further amendments were requested, and the Committee members present agreed that the draft minutes for the 24 June 2020 meeting were a true and accurate record and could be finalised.</p>	
5.0	<p>Business Arising from Previous Minutes</p> <p>ESJ called for any business arising from the previous minutes noting that there were three items listed on the agenda. LM reported that the requested change to the wording of the advertisement for the CLC meeting would also be addressed.</p>	

5.1 Correction to DWER Compliance Reporting

LM stated that at the last meeting it was reported that the Department of Finance was compliant with both conditions of the IWDF Environmental Licence but when all compliance auditing was completed it was clear that this was not correct as there was one technical noncompliance for Condition 2 of the Licence (see below).

Condition 2 Notification of Intention to Dispose

The licensee shall notify the CEO in writing at least 3 months prior to the delivery of waste to the Intractable Waste Disposal Facility Mt Walton East.

The Proponent was asked to explain why this noncompliance had occurred.

The CLC was informed that the CEO of the Department of Water and Environmental Regulation (DWER) was advised of the disposal operation in writing, on the 12 December 2019. Notification occurred as soon as Finance became aware that a disposal operation at the IWDF was probable. Due to contractual arrangements at the location where the waste was stored there was a requirement that the waste be removed from the storage location before the end of February. As it was not sensible to transport the waste to another storage location and then to the IWDF within such a short time frame transport of waste to the IWDF began in early February 2020. This therefore was less than 3 months from the date of notification.

There was discussion about the purpose of Condition 2 relating to the requirement to give three months notification of a deposit on the Environmental Licence. It was explained that the purpose of Condition 2 was unclear.

It was therefore agreed that the proponent would discuss the requirements of Condition 2 with the DWER and request that consideration be given to modifying the Condition to at least 28 working days.

5.2 Format of CLC Minutes

JMcL commented that although the issue of Department of Finance branding was raised at the last meeting a consensus decision to remove the proponent branding was not made. JMcL further commented that from 1995 to 2011 the minutes of CLC meetings did not display the branding of the Proponent and therefore the minutes reflected that independent status of the CLC. The CLC meeting minutes have displayed the proponent branding since 2012.

JMcL therefore asked that the CLC consider a motion to remove the Proponent branding from future minutes of the CLC.

ESJ responded that the Proponent did not oppose this motion.

It was agreed that the minutes of the CLC meeting would no longer display the branding of the Proponent for the IWDF. It was also agreed that the minutes would display the appropriate file name for the Department of Finance and the FMC in the footer of the minutes so that they may be located in the future.

Post Meeting Note: It should be noted that these minutes no longer display the branding of the Department of Finance.

Proponent to discuss modifying Condition 2 with the DWER before the next CLC meeting.

	<p>5.3 Minutes of the Management Review Meeting</p> <p>LM informed the CLC, that as agreed at the last meeting, the minutes of the IWDF Management Review Meeting held 23 June 2020 were now available. Hardcopies were provided to JMcl, AK, MC, and BC. LM also reported that electronic copies were available on request.</p> <p>JMcl asked for clarification on whether MRMs were to be held twice a year as it seemed that in the 2019 – 2020 PCR they were held annually.</p> <p>Post Meeting Note: At the June 2019 Management Review meeting it was suggested that Management Review meetings be held twice a year but <i>Management Plan 11 - Management Review</i> was not updated until after the 23 June 2020 Management Review meeting where it was agreed that the meeting should be held twice yearly which would enable the management team to be better informed and it may reduce the meeting time. A meeting in the first half of December 2020 is proposed.</p> <p>5.4 Change to the Wording of the Advertisement for the CLC Meeting</p> <p>At the previous meeting JMcl requested that future advertisements for community members and meeting notifications be modified.</p> <p>JMcl requested that the sentence in the advertisement be adjusted to read:</p> <p>“The role of the CLC is not only to ensure that the community remains informed of activities at the IWDF but to have input into and to raise issues relating to the operation and management of the IWDF”. (From the advertisement dated 13.06.2020).</p> <p>Post Meeting Note: The advertisement for the December 2020 CLC meeting was updated to read: “The role of the CLC is to ensure that the community remains informed of the activities at the IWDF and to have input into and to raise issues relating to the operation and management of the IWDF.”</p>	
6.0	<p>Management of the IWDF</p> <p>6.1 Performance and Compliance Reporting (PCR)</p> <p>LM reported the draft 2019 – 2020 PCR was now complete.</p> <p>ESJ reported that the draft 2019 – 2020 PCR was submitted to the DWER-Environmental Protection Authority (EPA) on 30 September 2020.</p> <p>A hardcopy of the draft 2019 – 2020 PCR was tabled at the meeting and the CLC was informed that an electronic copy was also available if requested. JMcl took custody of the tabled draft 2019 – 2020 PCR.</p> <p>The CLC was reminded that the PCR was still in draft and therefore should not be provided to those outside the committee until the PCR had been reviewed and final approval received from the EPA.</p>	

6.2 Compliance Auditing

LM reported that the compliance auditing for the current financial year was now complete and has been included in the 2019 – 2020 PCR. The following summary was provided to the CLC.

	Instrument	Status
6.2.1	Ministerial Statement 562	No noncompliances
6.2.2	Department of Finance, Building Management and Works Environmental Licence (DWER)	One technical noncompliance (Condition 2)
6.2.3	Radiological Council Registration (RCWA)	No noncompliances
6.2.4	Department of Foreign Affairs and Trade, The Australian Safeguards and Non-Proliferation Office (ASNO) Permit	No noncompliances
6.2.5	Department of Finance, Building Management and Works - Environmental, Health and Safety Management Systems	One noncompliance MRM not held within 12 months from date of previous meeting
6.2.6	IWDF (FMC) - Health and Safety Management Systems	No noncompliances
6.2.7	Department of Finance, Building Management and Works – Management Plans	One noncompliance MRM not held within 12 months from date of previous meeting

6.3 Five Yearly Technical Audit by ARPANSA

LM reported that the October 2018 Technical Audit Report was received by Finance in February 2020, however, this report contained some factual errors which ARPANSA have been made aware of. ARPANSA have agreed to issue an updated report.

6.4 Operational Safety Assessment and Safety Case

The draft Operational Safety Assessment and Safety Case documents were provided to ARPANSA for third party comment in October 2016 and April 2017 respectively, but since then there has been almost no feedback or comment from ARPANSA regarding these documents.

Several discussions with representatives of ARPANSA about these documents have occurred during 2020 including a video conference and ARPANSA had agreed to provide feedback by the end of September 2020. Recent communication with ARPANSA has indicated that the feedback can be expected in the first week of October 2020.

6.5 Access Road - Status Update

6.5.1 Access Road Condition and Management

It was reported that the next IWDF Access Road condition report would be completed in the third week of October when the FMC visited the IWDF to complete the required monitoring event. Reporting will be available at the next CLC meeting.

ESJ noted that the Department of Finance takes safety very seriously and that the road has never been in better condition and is now adequately signposted.

MJS also commented that the condition of the road had never been better.

A summary of the road use agreement with Tellus Holdings was requested by JMcl and AK.

JMcl supported the request for a copy of the road use agreement without any 'commercial in confidence' content since ESJ at item 6.2.2 of the minutes of 24.06.2020 had reported that BA has the responsibility for actively managing the requirements of the agreement and further commented that the Department of Finance will undertake a regular review of the agreement requirements to ensure that the agreement is working as it should and that Finance also committed to report to the CLC if aspects of the agreement were modified for any reason.

JMcl also stated that access to the agreement was needed by the CLC to use as a baseline on which to monitor any modifications to the agreement and any effect it would have on the function of the IWDF.

MC commented that in his view management of the IWDF Access Road was outside the remit of the CLC.

ESJ commented that the Access Road is not part of the Terms of Reference and asked the committee why the status of the Access Road was of concern.

AK and JMcl responded that the Access Road is part of the IWDF as without the Access Road the IWDF could not operate, and all operational procedures are to be publicly available.

ESJ reiterated comments made at the 24 June 2020 CLC meeting, that the agreement would not be shared as it is commercial in confidence. ESJ further noted that the State's insurer and the State Solicitor's Officer had been involved in the drafting of the Road Use Agreement to ensure that the State's interests are protected.

Shire of Yilgarn delegates, PN and BC raised the concern that transparency is a major issue in the operation of local government and noted that transparency is also the issue in the CLC having access to the road use agreement made with Tellus Holdings.

JMcl supported their view that transparency is required in the operation of the IWDF.

	<p>6.5.2 New Signs on the Access Road</p> <p>ESJ reported that six new signs were to be installed on the Access Road by the FMC during the October site visit.</p>	
<p>7.0</p>	<p>CLC Terms of Reference</p> <p>7.1 Updates to the Terms of Reference</p> <p>7.1.1 JMcL reported that she had reviewed past versions of the CLC Terms of Reference and is concerned that there have been changes made to the Terms of Reference without the approval of the CLC.</p> <p>Specifically, JMcL referred to dot point four of the original, 2000, CLC Terms of Reference and commented that the content of this dot point is no longer included in the Terms of Reference.</p> <p>Dot point 4 is provided below:</p> <p><i>To allow the community to provide input into how the site is operated and managed.</i></p> <p>JMcL also referred the CLC to the latest version of <i>IWDF Management Plan 10 Community Liaison</i> specifically the following:</p> <p><i>Environmental Health and Safety Policy Statement – Liaise directly with the community on all operational activities and outcomes and ensure all disposal details and monitoring records, are both publicly available and securely stored for future reference.</i></p> <p><i>Management Target – Representatives of the community can regularly voice their concerns and discuss issues and changes to the management of the IWDF.</i></p> <p><i>Management Program – A CLC, containing members of the community meets quarterly to raise community concerns, review important documents, and provide input into operational decision making.</i></p> <p>JMcL commented that there was inconsistency within the proponent documents and requested that this be addressed by the proponent. This was supported by other community representatives present.</p> <p>MC commented that the IWDF had moved on since 2001 and that input from the community may no longer be required to the same extent as was required in 2001.</p> <p>ESJ commented that changing the words may not change the operation of CLC in practice.</p> <p>AK likened this attitude to a priest moving the organ 1cm per week across the church thinking that the parishioners wouldn't notice the change. But we are noticing the change by stealth and it is up to the CLC to review the ToR annually and make changes if needed.</p> <p>It was agreed that the CLC Terms of Reference should be reviewed with consideration to the above discussion.</p>	<p>All CLC members provide suggested changes to the ToR to</p>

	<p>It was also agreed that CLC members should send their suggestions and comments to LM who will compile them for discussion at the next meeting.</p> <p>7.1.2 Update to EOI Appended to Terms of Reference</p> <p>LM reported that the function of the CLC as documented in the current Terms of Reference had now been included in the EOI appended to the Terms of Reference but may need to be modified if the functions changed because of the agreed review.</p> <p>7.2 Nominations for CLC Members</p> <p>LM reported that CLC membership tenure for DW, AK, JMcl will terminate on 31 October 2020.</p> <p>On the 14 September 2020, a request for Expression of Interest (EOI) for CLC committee members was advertised in the Kalgoorlie Miner and the West Australian newspapers.</p> <p>AK and JMcl each submitted an EOI which were sent to the CLC with the draft meeting agenda on 24 September 2020.</p> <p>DW completed an EOI on 1 October 2020.</p> <p>No other EOIs were received and LM therefore proposed that AK and JMcl be confirmed as community members for the Shire of Coolgardie for a further three years and DW be confirmed as a community member for the region outside the Shires of Coolgardie, Yilgarn and Menzies and the City of Kalgoorlie-Boulder for a further three years.</p> <p>The proposal was accepted by the CLC.</p>	<p>LM who will compile for discussion at the next meeting.</p>
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>LM reported that there have been over 25 waste enquiries during 2020.</p> <p>8.2 Waste Acceptance Applications</p> <p>LM reported that seven waste acceptance proformas had been, received, assessed and waste owners notified of the outcome of that assessment during 2020.</p>	
9.0	<p>General Business</p> <p>9.1 Summary of the IWDF Operational Model</p> <p>9.1.1 Cost Recovery</p> <p>To better respond to this agenda item ESJ requested that AK expand on what was being requested in terms of a summary of the IWDF operational model. AK declined to expand. AK had requested a summary of the cost recovery model as she couldn't find it anywhere.</p>	

ESJ stated that the IWDF is operated on a cost recovery model and the operational process for the IWDF is clearly outlined in the IWDF Information Handbook.

9.1.2 Management of Waste Enquiries

ESJ stated that all waste enquiries received via the IWDF-MountWalton@finance.wa.gov.au email address were forwarded, as soon as they are received, to the FMC for action.

JMcL sought clarification on the management of waste enquiries as she thought that enquiries were received by Finance and FMC at the same time.

LM explained that this was initially proposed but all enquiries go to Finance who forward them to the FMC.

LM reported that the current system is working well, and all waste disposal enquiries are now forwarded to the FMC in a timely manner.

9.2 Practical Monitoring of Road Conditions and Use

AK asked the Proponent if there were cameras on the Access Road and if so where they were located?

ESJ responded that Finance will respond in a post meeting note to be included in the draft minutes.

Post meeting note: Each communications tower along the Access Road has at least one camera.

9.3 Changes to Ministerial Statement 562

JMcL reported that notwithstanding the proponent's decision that they would not be pursuing the CLC request to remove Commitment 7 of Ministerial Statement 562, members of the committee have followed the advice from ESJ at the last meeting and have been pursuing this request for change through the appropriate channels.

JMcL reported that she had written to the Minister for the Environment about this request.

AK reported that she had written to the DWER and had received advice that the request had been passed onto the EPA.

ESJ responded that the question of amendments to Ministerial Statement 562, specifically commitment 7, was put to Government in the Legislative Council on the 23 September 2020, to which it advised "The state government has no plans to make any changes to ministerial statement 562." ESJ stated that this was now a matter of public record and that it would be not be appropriate to comment on the government's position.

JMcL produced a copy of the same Hansard and noted that there was a 3-point response to the question. She read the second response to the CLC which stated: "The Department of Water and Environmental Regulation has advised that a change

	<p>of this nature is likely to constitute a revised proposal and require a valid referral under Section 38 of the <i>Environmental Protection Act 1986</i>.”</p> <p>JMcL asked ESJ what would be the procedure in order to submit a valid referral under Section 38?</p> <p>9.4 Questions for Slade Greenaway of Tellus Holdings</p> <p>PN asked if it was possible to ask Slade Greenaway of Tellus Holdings some questions before the meeting closed.</p> <p>ESJ responded that it was not appropriate to discuss issues directly or indirectly related to the Sandy Ridge Facility during the IWDF CLC meeting as it is outside the Terms of Reference of the CLC.</p> <p>Slade Greenaway agreed to meet with CLC members after the meeting closed.</p>	
10.0	<p>Close / Scheduling of Next Meeting</p> <p>10.1 The meeting closed at 11:50 am</p> <p>10.2 Next meeting:</p> <p>It was agreed that the next meeting be held 10 December 2020.</p> <p>Post Meeting Note: Due to a conflict in commitments for Department of Finance representatives the meeting has been rescheduled for 10.00 am 8 December 2020.</p>	

Meeting Minutes

Intractable Waste Disposal Facility (IWDF), Mount Walton - East Community Liaison Committee (CLC) Quarterly Meeting

Chairperson:	Emma Savage-Jones	Date & Time:	8 December 2020 10.05 am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
Version	Final Revised	Meeting No.	2020/21 Q2

Attendees:		
Jan McLeod	(JMcl)	Coolgardie Community Representative
Anna Killigrew	(AK)	Coolgardie Community Representative
Peter Harrison	(PH)	Coolgardie Community Representative
Mal Cullen	(MC)	President, Shire of Coolgardie
Tracey Rathbone	(TR)	Deputy Shire President, Shire of Coolgardie
Emma Savage-Jones	(ESJ)	IWDF Project Director, Department of Finance (Chairperson)
Mark Bryden	(MB)	General Manager, Operations, Department of Finance
Leanne Morton	(LM)	IWDF FMC Project Manager
David Williams	(DW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Nic Warren	(GH)	Executive Manager Regulatory Services, Shire of Yilgarn
Bryan Close	(BC)	Deputy Shire President, Shire of Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn

Apologies		
James Trail	(JT)	CEO, Shire of Coolgardie
Lynn Webb	(LW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager

Observer
Rowan Acton representing Department of Finance Amy Hallam representing Department of Primary Industries and Regional Development

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>ESJ declared the meeting open at 10.05 am.</p> <p>ESJ acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>ESJ introduced herself and explained her role as the Intractable Waste Disposal Facility (IWDF) Project Director, representing the Department of Finance, the Proponent for the IWDF, Mount Walton East.</p> <p>ESJ welcomed all committee members present and thanked them for making the time to attend the meeting.</p> <p>ESJ thanked the public observers, Rowan Acton (Director, Regional Operations, Department of Finance) and Amy Hallam (Director, Regional Development, Department of Primary Industries and Regional Development) for attending the meeting.</p> <p>ESJ also advised that observers are not able to participate in the meeting, however that there would be an opportunity at the end of the meeting for observers to ask any questions related to the IWDF.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p>	
4.0	<p>Previous Minutes</p> <p>The draft minutes for the previous meeting held on the 1 October 2020 were distributed on the 27 October 2020 via email, with a hardcopy to Jan McLeod.</p> <p>Feedback on the draft minutes was received from several members and the second set of draft minutes were sent to the CLC for comment on the 22 November 2020.</p> <p>ESJ asked the committee if there were any further amendments to the draft minutes.</p> <p>ESJ commented that she could not accept the changes made to Section 9.3 paragraph 4 as she had read from a prepared statement at the meeting and therefore requested that this paragraph revert to the original text contained in the draft minutes sent 27 October 2020. ESJ also requested that at Section 9.4 paragraph 2 the deleted words "as it is outside the Terms of Reference for the CLC" be reinstated as these words were stated.</p>	

	<p>No further changes were requested by the committee, and it was agreed that with the one exception of Section 9.3 paragraph 4 the minutes sent on the 22 November were a true and accurate record and could be finalised.</p>	
<p>5.0</p>	<p>Business Arising from Previous Minutes</p> <p>ESJ called for any business arising from the previous minutes noting that there were nine items listed on the agenda. ESJ further commented that several of the business arising items would be discussed at the appropriate agenda item later in the meeting.</p> <p>5.1 DWER Licence Condition 2</p> <p>Condition 2 Notification of Intention to Dispose The licensee shall notify the CEO in writing at least 3 months prior to the delivery of waste to the Intractable Waste Disposal Facility, Mt Walton East.</p> <p>The CEO of the DWER was advised of the proposed disposal operation, in writing, on the 12th of December 2019. Transport of waste to the IWDF began on the 3rd of February 2020. Therefore, the CEO of the DWER was not notified at least three months prior to delivery of waste to the IWDF.</p> <p>Notification to the DWER occurred as soon as Finance became aware that a disposal operation at the IWDF was probable. Due to contractual arrangements at the location where the waste was stored there was a requirement that the waste be removed from its storage location before the end of February. It was not sensible or practical to transport the waste to another storage location and then on to the IWDF within such a short time frame therefore the waste was transported to the IWDF from 3rd February until 25th March.</p> <p>Discussion with DWER has occurred and due to the expense of changing the license condition, it has been agreed that notification will occur earlier advising the DWER CEO of the intention to undertake a disposal campaign and the anticipated delivery date (hence meeting the three-month notification condition). Once the disposal campaign is confirmed (i.e., agreements with waste owners are finalised, EPA approval received etc.) a follow up email will be sent to the DWER CEO confirming that the disposal is proceeding and to confirm the delivery date, or alternatively that the disposal is not proceeding.</p> <p>LM asked if the DWER had advised the proponent of the purpose of Condition 2. ESJ responded that despite being asked about the purpose of Condition 2 the DWER had not provided a response.</p> <p>JMcL requested that it is recorded in the minutes of the meeting that the proponent will pursue a change to this condition when the licence becomes due for renewal in February 2022.</p> <p>5.2 Format of CLC Minutes</p> <p>The minutes no longer display the branding of the Department of Finance. The minutes display the document reference for both the Department of Finance and the Facility Management Contractor so that the minutes can be located in the future.</p>	<p>Proponent to record on the DWER Licence file a requirement to review Condition 2 at the time of renewal in Feb 2022.</p>

5.3 Wording for the CLC Meeting Advertisement

The wording for the advertisement for the December 2020 CLC meeting was updated to read:

“The role of the CLC is to ensure that the community remains informed of the activities at the IWDF and to have input into and to raise issues relating to the operation and management of the IWDF”.

5.4 Access Road Sign Installation

ESJ reported that six new ‘Private Road’ signs which read “Private Road, Authorised Access Only, Government of Western Australia, Phone (08 65511600)” were installed on the Access Road during the last week in October.

LM circulated a photograph of one of the signs for information.



PH asked who had designed the signs and ESJ responded that she had chosen the wording for the signs. LM commented that the colour scheme and general wording for the signs was established in 1992. The phone number is a more recent addition.

PH commented that the phone number was not useful as there was no phone service on Access Road. It was clarified that there is phone service on the Access Road for the first 30 or so kilometres from Great Eastern Highway.

PH also commented that in his view the new signs on the Access Road were not adequate as they did not cover all the tracks intersecting with the Access Road. PH also felt that there were various road users who had a legitimate reason for being on the Access Road such as:

- exploration personnel
- Carina Mine personnel
- Department of Biodiversity, Conservation and Attractions personnel
- people using Jaudi Station
- Shire of Coolgardie personnel.

	<p>PH expressed a view that there was no sense in having a private road given there were so many potential road users.</p> <p>PH provided the names of some of the tracks.</p> <ul style="list-style-type: none"> • Ryans Find Road (this has new signs on the western and eastern entrances) • Gus Luck Track (track from Southern Cross to Menzies) • Mt Dimer Road • Jaudi Station Road • various wood cutters tracks / station roads and mining access roads <p>PH also commented that he would prefer signs that advised people what they should do if they find themselves on the Access Road after travelling from one of the intersecting tracks.</p> <p>PN asked what makes the Access Road a private road. LM responded that that road was constructed on a Class C Reserve (44102) with a Management Order vested with the Minister for the Proponent (Minister for Health) at the time. The Access Road Management Order has moved to the appropriate Minister each time there has been a new proponent.</p> <p>JMcL read from the original Management Order which states that the purpose of the Reserve is "Access".</p> <p>Various views about the appropriateness of the 'private' status of the Access Road were offered but no actions resulted from the discussion.</p>	
6.0	<p>Management of the IWDF</p> <p>6.1 Performance and Compliance Reporting (PCR)</p> <p>A copy of the draft 2019 – 2020 PCR, which includes the Close-out Report for the 2020NRT01 Disposal Operation was submitted to the EPA for approval via the Department of Water and Environmental Regulation (DWER) website on the 30th of September 2020. To date no response from EPA has been received, however, the DWER confirmed receipt of the report on 16th of October 2020.</p> <p>A hardcopy of the draft 2019 – 2020 PCR was tabled at the CLC meeting held 1st of October 2020 for the committee's information and review. JMcL, Coolgardie community member, took custody of the document and has provided feedback on the content and has also asked for clarification on various sections of the document.</p> <p>An electronic copy of the draft 2019 – 2020 PCR has been provided to Anna Killigrew, Coolgardie community member.</p> <p>If a response from the DWER is not received before the end of December (three months after the report submission date), ESJ will send a follow up email to DWER on 11th January 2021 seeking status of approval progress.</p> <p>JMcL commented that the PCR it is the most detailed PCR she has reviewed. The PCR contains the management manuals, close out report for the 2020NRT01 disposal operation which included lots of photographs providing a visual summary of all the disposal procedures. JMcL commented that she thought the documentation in the PCR was excellent.</p>	

<p>JMcL requested that when the proponent advertises that a disposal may be likely, as occurred 4 Dec 2019 in the West Australian, an advertisement is also placed in the Kalgoorlie Miner.</p> <p>JMcL also noted after reviewing the PCR that the IWDF Management Plans are reviewed and updated, if required, twice yearly and requested that any updates to the Management Plans are reported to the CLC.</p> <p>TR requested copies of all documents tabled or discussed at the last CLC meeting.</p> <p>6.2 Management Review Meeting</p> <p>The Management Review Meeting was held 24 November 2020. LM provided hard copies of the minutes of this meeting to JMCL and AK. LM informed the CLC that electronic copies were also available on request.</p> <p>6.3 Compliance Auditing</p> <p>LM reported that the only compliance auditing for the current financial year that has been completed is the compliance audit against the Ministerial Statement 562 as this audit is completed twice yearly. No noncompliances were recorded against Ministerial Statement 562.</p> <p>6.3 Five Yearly Technical Audit by ARPANSA</p> <p>As was reported at the last meeting the October 2018 Technical Audit Report was received by Finance in February 2020, however, this report contained some factual errors which ARPANSA have been made aware of and ARPANSA had agreed to issue a modified report. More recently ARPANSA requested a discussion about a few issues requiring clarification and a video conference occurred between the Management Team and representatives of ARPANSA on the 24 November to discuss these issues. The modified audit report is now expected by end of December.</p> <p>6.4 Draft Operational Safety Assessment and Safety Case</p> <p>The draft Operational Safety Assessment and Safety Case documents were provided to ARPANSA for third party comment (high level review) in October 2016 and April 2017, respectively.</p> <p>Several discussions with representatives of ARPANSA about these documents have occurred during 2020 including a video conference and ARPANSA had agreed to provide feedback by the end of September 2020. A high-level review of the IWDF draft Operational Safety Assessment was received from ARPANSA on 15 October 2020. The review has been considered by the IWDF Management Team and a high-level response was prepared for discussion with the Radiological Council (WA) at the meeting held 3 December 2020. At this meeting there was general agreement that a staged approach to update and improve the documents would be undertaken.</p> <p>6.5 Access Road – Condition Report</p> <p>ESJ reported that MS has assessed the condition of the Access Road during the last week of October and reported that the Access Road was in good condition.</p>	<p>Next time a disposal is planned the Proponent to place advert in both West Australian and Kalgoorlie Miner</p> <p>LM to email documents to TR</p>
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	<p>PH reported that the condition of the road from Great Eastern Highway to the railway line was not good in parts but north of the railway line the condition of the road was very good.</p> <p>JMcL and AK reported that approximately one kilometre from Great Eastern Highway, near a borrow pit used by Tellus Holdings, there is a parking or holding bay for trucks. It was reported that there is concern that this area is not adequate for the intended purpose as there is not sufficient room for a truck to turn around. There was concern that this could be dangerous during bush fires. The need for toilet and wash facilities was also raised.</p> <p>Post meeting note: The widening of the road discussed above was created in the mid-1990s so that trucks loaded with waste heading to the IWDF could stop if it were raining heavily or if nightfall had occurred which would prevent the trucks from traveling to the IWDF. There was never any intent for trucks to turn around at this widened area and in fact this area has never been used for its intended purpose.</p>	
7.0	<p>CLC Terms of Reference and Operating Guidelines</p> <p>7.1 Revised Terms of Reference and Operating Guidelines</p> <p>As agreed at the last meeting CLC members sent their suggestions and comments on the latest version (V15) of the CLC Terms of Reference to LM who compiled them into one document for discussion at this meeting.</p> <p>Hardcopy documents were provided to the CLC members present and each section of the document was discussed and agreed.</p> <p>In general, a majority agreement was reached to:</p> <ul style="list-style-type: none"> • Separate the document into two sections one being the 'Terms of Reference' and the other being the 'Operating Guidelines' for the CLC. • The 'Terms of Reference' will revert to the original terms of reference as established in 2000 and should not be modified in the future. • CLC operating guidelines such as meeting frequency may be modified by majority agreement of the CLC. <p>The issue of the Chairperson reviewing and approving the draft meeting minutes was discussed. JMcL and AK both stated that it was not appropriate for the Chairperson to approve the draft minutes before sending to the CLC and only the CLC should do this.</p> <p>MB commented that the Department of Finance has a responsibility to ensure the meeting minutes were professional.</p> <p>A new version of the Terms of Reference and Operating Guidelines would be compiled with consideration to the discussion and agreed result. A draft Terms of Reference and Operating Guidelines will be sent to the CLC with the draft meeting minutes for comment.</p> <p>TR commented that it was important to keep the ToR simple and clear.</p> <p>JMcL read a section from the minutes of CLC meeting, 11 September 2000. This section thanked the CLC for their role in the development of the document and due to</p>	<p>LM to send new version of ToR to CLC with draft minutes.</p>

	<p>their knowledge of how the site operated their comments and input into the S46 had been extremely helpful.</p> <p>MB commented that the Department of Finance values the CLC, but the CLC is not the management group for the Access Road.</p> <p>MB said the CLC has no input into the management of the access road. If the CLC has complaints about Finance’s management, then write privately to MB, General Manager of Finance.</p> <p>JMcL commented that the CLC represents the community in the operation and management of the IWDF. The Access Road is part of the operation and management of the IWDF.</p> <p>TR commented that it was important to be clear that the CLC is not a decision-making committee and does not consider legislation and regulations.</p> <p>PH asked what was the definition of Proponent?</p> <p>ESJ responded that the proponent is as understood by the Environmental Protection Authority.</p> <p>A discussion regarding the frequency of the CLC meeting followed the ToR discussion.</p> <p>ESJ asked the members of the CLC to indicate their meeting frequency preference.</p> <p>TR – twice yearly. MC – twice yearly but if virtual meetings can be held 3 times yearly. PN – flexible, supports virtual meetings. BC – three times per year, emails are acceptable. AK – four times per year. PH – three times per year and dates to be set in advance. DW – four times per year. JMcL – four times per year, does not support virtual meetings. NW – three times per year, supports virtual meetings.</p>	
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>LM reported that there have been over fifty waste enquiries since December 2019.</p> <p>8.2 Waste Acceptance Applications</p> <p>LM reported that there have been eight approved waste disposal application, four applications under assessment and four applications awaiting assessment.</p> <p>LM also reported that a submission had been made to the Radiological Council (WA) to dispose of radioactive waste at the IWDF during 2021.</p>	
9.0	<p>General Business</p> <p>9.1 Update to 2-page IWDF Brochure</p>	

LM reported that the 2-page brochure had been updated to include the 2020 disposal operation and there had been one sentence reworded. Hardcopies of the brochure were provided to JMCL and AK. LM said electronic copies can be provided on request.

9.2 Changes to Ministerial Statement 562.

JMCL referred to her communication sent to the CLC members from AK on the 4 December 2020 (attached to these minutes). JMCL reported that she had written to the Minister for the Environment about the CLC request to the Department of Finance to change the WA waste only condition placed on the IWDF.

JMCL asked why the proponent refused to circulate her documents to the CLC members when she requested this to occur.

JMCL then reported that she had received a response from the Minister for the Environment dated 5 November 2020 (attached to these minutes). In this response the Minister states:

"In this instance, a change to the proposal to receive waste from outside Western Australia would warrant a referral by the proponent to the Environmental Protection Authority for consideration. I am advised that this is not likely to occur because the Department of Finance has indicated that they have no intention of expanding the facility to accept interstate waste."

MB replied that specifically in the context of proponent commitment 7.0 'we have no intention to review the Ministerial Statement'. MB added the Government has no plans to expand the facility.

JMCL clarified, for the CLC, that despite the Ministers comment, expanding the IWDF was not required to accept waste from outside Western Australia. She asked why her letter cannot be tabled given that no expansion of the facility is required?

JMCL further asked that if the decision has been made by the Department of Finance and not Cabinet, who has made all other decisions about changes to the IWDF, what justification does the Department of Finance have for making such a decision without consulting Cabinet.

MB responded that the Department of Finance did not have a compelling case to make the requested change to the operating conditions of the IWDF. There is no requirement to do so. He is not our minister. The site was established for a purpose, and it will not be changed.

MB also stated that the Department of Finance could not comment on statements made by Ministers other than the Minister responsible for the Department of Finance.

ESJ stated that the minister responsible for the Department of Finance is Ben Wyatt, not the one who wrote that letter to JMCL.

MC suggested that the CLC should not be discussing the letter that JMCL wrote to the Minister for the Environment on 18 September 2020, that was circulated to the CLC members by email from AK on 4 December 2020.

	<p>MC asked to make a statement to the CLC regarding a comment about the Shire of Coolgardie made by JMcL in her letter to the Minister for the Environment.</p> <p>ESJ allowed the following statement to be made to the CLC meeting.</p> <p>MC stated that the information about the Shire of Coolgardie included in the letter to the Minister for the Environment was incorrect. The Shire of Coolgardie has not taken out a \$950,000 loan on behalf of the operators of the lithium mine at Bald Hill.</p> <p>9.3 Planning the dates for 2021 CLC Meetings.</p> <p>JMcL requested that the next meeting be held 11 March 2021.</p> <p>MB responded that representatives from Finance could not attend a meeting on the 11 March as it was just before the State election.</p> <p>JMcL asked why the State election was an issue with respect to the CLC meeting as the CLC is apolitical.</p> <p>No answer was offered for this question.</p> <p>No CLC meeting dates for 2021 were agreed.</p> <p>9.4 Waste Register (Database)</p> <p>The IWDF waste inventory database is almost complete. The Australian Safety and Non-proliferation Organisation and the Radiological Council have asked to review the publicly available fields to ensure that the data that will be made publicly available does not contain sensitive information.</p> <p>The inventory of the 2020 disposal is in the database.</p> <p>9.5 Access Road Level Crossing</p> <p>In the early part of 2021, ARC infrastructure, the company that manages and operates the state's rail network across the southwest of Western Australia, intends to install active protection (boom gates and LED flashing lights) to the level crossing on the Access Road.</p> <p>9.6 IWDF Budget</p> <p>DW requested information about the IWDF operating budget for the next financial year.</p> <p>ESJ took this question on notice.</p>	
10.0	<p>Close / Scheduling of Next Meeting</p> <p>10.1 The meeting closed at 12:00 midday.</p> <p>10.2 Next meeting:</p> <p>It was suggested that the next meeting be held late March or April 2021.</p>	

REQUEST TO THE MINISTER FOR THE ENVIRONMENT

This letter has been written on behalf of the Mt Walton East IWDF Community Liason Committee to change the Ministerial conditions regarding the Waste Acceptance Criteria for the IWDF which currently accepts waste from WA only.

The Committee wants to see this amended to "accepting waste generated within Australia," for the following reasons :-

The Mt Walton East Intractable Waste Disposal Facility

- i) would be able to be used as a National Repository for Australia's low-level and short-lived intermediate-level radioactive waste,
- ii) is geologically and hydrologically the best location in Australia for this,
- iii) is 25 km² and has the available space,
- iv) has all licences and permits in place,
- v) operates at world's best-practice,
- vi) has an adjusted cost-for-recovery-price structure which will make it more conducive for disposal operations,

vii) is serviced by a private road owned by the State. However this road is being used by a commercial company, TELLUS HOLDINGS LTD, which hopes to also operate a CLASS V landfill. This means that there will be no restriction to WA waste only on this road and a conflict of interest will thus occur.

Hence the Committee would request the Minister to:-

- change the operational condition from WA waste only to accept waste generated within Australia,
- acknowledge the fact that the Mt Walton East IWDF is ideally located to become Australia's Repository for low-level and short-lived intermediate level radioactive waste and operates at world's best-practice.
- lobby the Federal Government to secure the Mt Walton East IWDF as Australia's National Waste Repository for Class V material.

Attached are the Minutes of the Community Liason Committee Meetings :-

- 25 JULY 2019 see Sec. 9.3
- 3 APRIL 2019 Sec. 5.2
- 14 NOVEMBER 2018 Sec. 8, 9, 10.4, 10.5

Yours ...

Mrs J McLeod
Widgiemooltha via
Norseman WA 6443
18.09.2020

The Hon Stephen Dawson MLC
Minister for Environment; Disability Services;
and Electoral Affairs.
Dumas House
West Perth WA

Dear Sir,

I am writing in response to questions raised on my behalf by the Hon Kyle McGinn MLC. I have included a brochure about the Mt Walton IWDF that provides an overview of the facility prepared by the Dept. of Finance.

I wish to alert the Minister that the facility was never closed but due to some poor management by the Dept. of Building, Management and Works it seemed as if this was the case.

The last disposal operation was completed successfully earlier this year, on time and under budget, despite rain closing the IWDF access road on several occasions.

The site is located in the best possible place within Australia, has all the necessary licences and operates at World's Best Practice.

The site also operates under Federal Landfill Policy as disposal operators have to show that there are no current viable methods of re-using, re-processing or re-cycling the waste, before approval is given.

The enquiry process now goes not only to the Dept of Finance but to the Facility Management Contractor, and all enquiries are responded to.

An up-dated cost-recovery model has also been implemented.

The Mount Walton Community Liaison Committee has had concerns with the establishment of the Sandy Ridge Facility and this has been discussed at meetings over many years; one concern being that they are able to transport waste from anywhere in Australia using the IWDF access road, yet for the IWDF, waste is limited to WA.

The Committee raised a formal request to the proponent, the Dept. of Finance, on July 25, 2019 to have this condition changed. Another request was made by the President of the Shire of Coolgardie on October 24 2019. The Radiological Council also supports the changing of this condition, September 12 2019. The Dept. of Finance has stated that they will not be pursuing this request of the Committee.

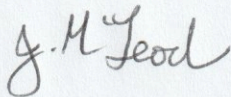
Even though in your letter you have said that Sandy Ridge has a number of financial assurances associated with it, these are currently under a Section 46 amendment to be modified. I have concerns regarding commercial operators; Sandy Ridge was developed via a MINING LEASE to mine kaolin for export to China, which is not happening. Waste disposal was a secondary market. This has now change to being their primary and only source of income. Once the project is not financially viable it will fold and will their financial assurance be enough as they want to make annual contributions. I have had experience; re: Shire of Coolgardie taking out a \$950,000 on behalf of the operators of the lithium mine at Bald Hill. The company went into financial administration and the Shire/Ratepayers were left with the repayments; (originally NO COST to the Shire.)

Logically, why have two facilities adjacent to each other taking radioactive waste? Let Sandy Ridge deal with the other waste but keep the radioactive waste in the one location and keep Mt Walton as the only site having to be monitored by future generations.

Only you and Cabinet can change this ministerial condition re: WA waste only; via Commitment 7, Ministerial Condition 562; to waste generated in Australia. Hence what is the procedure to be followed in pursuing this request?

I look forward to your specific reply.

Yours sincerely,

A handwritten signature in cursive script that reads "J. McLeod".

Jan McLeod
18.09.2020



**Minister for Environment; Disability Services; Electoral Affairs
Deputy Leader of the Legislative Council**

Our Ref: 62-23021

Mrs Jan McLeod
Widgiemooltha
via NORSEMAN WA 6443

Dear Mrs McLeod

Thank you for your correspondence, received in this office on 30 September 2020, regarding the operation of the Mt Walton East Intractable Waste Disposal Facility.

In regards to the Mt Walton facility, it is a condition of the approval that the facility only accept waste generated in Western Australia. The Mt Walton facility is operated by the Department of Finance (the proponent).

Under the *Environmental Protection Act 1986* (EP Act), a proponent may request a change to a proposal provided that a change might not have a significant detrimental effect on the environment which is in addition to, or different from, the original proposal.

In this instance, a change to the proposal to receive waste from outside Western Australia would warrant referral by the proponent to the Environmental Protection Authority for consideration. I am advised that this is not likely to occur because the Department of Finance has indicated that they have no intention of expanding the facility to accept interstate waste.

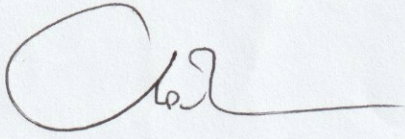
With regard to the Sandy Ridge Facility, I can advise you that the arrangements for the Financial Assurance of Ministerial Statement 1078 have recently been changed through section 46 of the EP Act.

The proponent of the facility is now required to provide an initial sum and ongoing annual contributions to a trust. This trust will grow over time and is considered sufficient to cover the costs of premature closure of the operation and its ongoing maintenance and monitoring after closure for a period of 100 years.

This change to the Financial Assurance coupled with the existing stringent conditions of Ministerial Statement 1078 will ensure the environmental impacts from the proposal are managed appropriately and that the proponent will incur all costs associated with the closure of the Sandy Ridge Facility.

Thank you for your interest in this matter.

Yours sincerely

A handwritten signature in black ink, appearing to be 'S Dawson', written in a cursive style.

Hon Stephen Dawson MLC
MINISTER FOR ENVIRONMENT

05 NOV 2020

Meeting Minutes

Intractable Waste Disposal Facility (IWDF), Mount Walton - East Community Liaison Committee (CLC) Quarterly Meeting

Chairperson:	Emma Savage-Jones	Date & Time:	1 April 2021 10.10 am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
Version	Final Revised (V2)	Meeting No.	2020/21 Q3

Attendees:		
Peter Harrison	(PH)	Coolgardie Community Representative
Anna Killigrew	(AK)	Coolgardie Community Representative
Jan McLeod	(JMcl)	Coolgardie Community Representative
Lynn Webb	(LW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
David Williams	(DW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Mal Cullen	(MC)	President, Shire of Coolgardie
Bryan Close	(BC)	Deputy President, Shire of Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
Nic Warren	(GH)	Executive Manager Regulatory Services, Shire of Yilgarn
Emma Savage-Jones	(ESJ)	IWDF Project Director, Department of Finance (Chairperson)
Brendon Atkinson	(BA)	IWDF Contract Manager
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
Leanne Morton	(LM)	IWDF FMC Project Manager

Apologies		
James Trail	(JT)	CEO, Shire of Coolgardie
Tracey Rathbone	(TR)	Deputy President, Shire of Coolgardie

Observer		
Robin Scott Graeme Campbell		

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>ESJ declared the meeting open at 10.10 am.</p> <p>ESJ acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>ESJ introduced herself and explained her role as the Intractable Waste Disposal Facility (IWDF) Project Director, representing the Department of Finance, the Proponent for the IWDF, Mount Walton East.</p> <p>ESJ welcomed all committee members present and thanked them for making the time to attend the meeting.</p> <p>ESJ thanked the public observers, Robin Scott and Graeme Campbell for attending the meeting.</p> <p>ESJ advised that observers are not able to participate in the meeting, however that there would be an opportunity after Item 6 of the agenda and at the end of the meeting for observers to ask any questions related to the IWDF.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p>	
4.0	<p>Previous Minutes</p> <p>The draft minutes for the previous meeting held on the 8th of December 2020 were distributed on the 5th of February via email, with a hardcopy posted to JMCL. Amended minutes were emailed on the 9th of March, with a hardcopy to posted to JMCL and further amendments were received, and version 3 of the minutes was circulated on Tuesday 30th of March 2021.</p> <p>Feedback on the draft minutes was discussed, in particular, section 9.2 (Changes to Ministerial Statement 562). There was discussion as to what should be included at this section, there was disagreement with respect to the information to be included. The majority of the CLC agreed to include references to and copies of:</p> <ul style="list-style-type: none"> - a handwritten letter from JMCL to the FMC dated 19 August 2019; 	

	<ul style="list-style-type: none"> - a formal letter from JMCL to the Minister for the Environment dated 18 September 2020; - the response from the Minister for the Environment to JMCL dated 5 November 2020; and - MC's statement made to the CLC at the 8 December 2020 meeting. <p>As a result of the above an updated version of the 8th of December 2020 minutes will be circulated to the CLC for comment.</p> <p>LW suggested that the CLC meetings be video recorded to allow more accurate written minutes to be reported. LW reported that this method is used by the Shire of Dundas to facilitate accurate council meeting minutes.</p>	
5.0	<p>Business Arising from Previous Minutes</p> <p>ESJ commented that several of the business arising items would be discussed at the appropriate agenda item later in the meeting.</p> <p>5.1 Changes to Ministerial Statement 562. ESJ commented that this item had been covered during the discussion regarding the draft 8th of December 2020 minutes.</p> <p>5.2 Update on the Access Road Railway Crossing upgrade. ESJ advised that there was no further update on the scheduling for the upgrade works.</p> <p>PH enquired if the proposed upgrade works were still planned and if so when was this likely to occur and what would the upgrade consist of.</p> <p>MC requested that the proponent report on the scheduling for the upgrade works at the next meeting.</p> <p>5.3 IWDF operating budget for the next financial year. At the December meeting, under item 9.6 <i>IWDF Budget</i>, David Williams requested information about the IWDF operating budget for the next financial year.</p> <p>The budget varies from year to year because of various activities such as the replacement of assets, the occurrence of mandatory reporting such as the 5 yearly technical audit report or radiation monitoring and the number of waste inquiries received requiring assessment.</p> <p>The Department of Finance also has an obligation to decommission the IWDF and rehabilitate the site for future land use. A provision for rehabilitation is included in the cost to the waste owner for each waste disposal and is an estimate of the waste owners share of the future obligations including the costs of decommissioning and rehabilitating the site to a standard suitable for the agreed future land use. The value of the provision as of 30 June 2020 as shown in the Department of Finance's annual report is \$651,000.</p>	

	<p>Link to the Department of Finance Annual Report 2019-20: https://www.wa.gov.au/sites/default/files/2020-09/2019-20%20Department%20of%20Finance%20Annual%20Report.pdf</p> <p>The IWDF operating budget for the 2021 to 2022 financial year is yet to be decided.</p> <p>5.5 General Comment on Minutes of the Previous Meeting</p> <p>JMcL raised the issue of the number of versions of draft minutes circulated to some CLC members before the minutes are provided to all the CLC members.</p> <p>JMcL referred to a comment made by Mark Bryden (MB) at the last meeting where MB stated: <i>The Department of Finance had a responsibility to ensure the meeting minutes were professional.</i></p> <p>JMcL was not comfortable with the comment by MB and commented that a review of the minutes by the proponent before circulation to the CLC was not necessary as the minutes prepared by LM were professional.</p> <p>The professionalism of the minutes, as prepared by LM, was supported by members of the CLC.</p>	
6.0	<p>Management of the IWDF</p> <p>6.1 Performance and Compliance Reporting (PCR)</p> <p>ESJ reported that the Department of Water and Environmental Regulation (DWER) personnel providing support to the Environmental Protection Authority (EPA) had advised that the 2019 – 2020 PCR was to be considered by the EPA at the March 2021 EPA meeting. A further update has been provided informing the proponent that the PCR was not considered by the EPA at the March meeting and will now be considered at the April meeting.</p> <p>JMcL asked for clarification regarding the DWER as the minutes of the last meeting stated that the EPA would be contacted for a status update on the assessment/approval for the PCR.</p> <p>ESJ explained that personnel from the DWER provide support to the EPA, and it was these support personnel that were contacted for an update to the status of the PCR assessment/approval.</p> <p>6.2 Management Review Meeting</p> <p>LM advised that the next Management Review Meeting (MRM) is scheduled for 3rd of June 2021.</p> <p>6.3 Compliance Auditing</p> <p>LM reported that compliance auditing of the licence, permit, registration, and system documents will commence late April and will be completed</p>	

	<p>in time to be tabled at the Management Review Meeting scheduled for 3rd of June 2021. Compliance auditing commences as close to the end of the financial year as possible.</p> <p>LW asked how community complaints about the IWDF are managed?</p> <p>LM responded that there is a complaint register within the Environmental, Quality and Health & Safety Management System where any complaints received are documented.</p> <p>LW questioned the integrity of self-auditing of compliance.</p> <p>LM explained that self-auditing of compliance requirements is standard practice for proponents in Western Australia. A qualified auditor is required to be used and evidence is essential to prove/support the audit result. The audit tables and all the supporting evidence is included in the annual PCR which is provided to regulators and the CLC. Independent technical compliance auditing is completed every five years.</p> <p>JMcL asked if significant updates to system documents would be reported at the next meeting.</p> <p>LM responded that any significant updates to the system documents are reported and discussed at the MRM and then will be reported at the next CLC meeting.</p> <p>LW asked if the minutes of the MRM would be available.</p> <p>LM/ESJ responded that the Minutes of the MRMs are included in the annual PCR and a copy of the minutes are also provided to the CLC.</p> <p>6.3 Five Yearly Technical Audit by ARPANSA</p> <p>ESJ reported that the five yearly technical audit report, for the technical audit completed in October 2018, was issued in February 2020. The report contained a few factual errors and after discussions with ARPANSA a modified report was issued 15th of March 2021. Comment on this report has been provided to ARPANSA and a final report is expected by the end of April.</p> <p>6.4 Draft Operational Safety Assessment and Safety Case</p> <p>No further work has been undertaken on the Operational Safety Assessment and Safety Case.</p>	
7.0	<p>CLC Terms of Reference</p> <p>7.1 Revised Terms of Reference</p> <p>As agreed at the December meeting CLC member suggestions and comments on the CLC Terms of Reference (ToR) were compiled into one document, draft revision 17. This document was emailed to the CLC</p>	

members on the 5th of February 2021 for their consideration and discussion at the meeting.

Committee members requested the following changes to draft revision 17:

- At section 1.3 Terms of Reference, dot point three, Department of Finance should be changed to proponent. The CLC agreed to this change.

- At section 1.3 dot point five, replace:
'To provide the opportunity for technical experts to brief the community about environmental protection and public health about the operation and management of the IWDF.'

with

'To provide the opportunity for technical experts to brief the community about environmental protection and public health with regard to the operation and management of the IWDF.'

The CLC agreed to this change.

- At section 1.3 dot point six, a request was made to include at the end of the sentence the following words:
'...and archived to allow the material to be available for future generations.'

There was discussion about the CLC's ability to ensure the practical application of this action and the CLC was also reminded that this action was a legal requirement for the Department of Finance under both the IWDF Radiological Council registration and the *State Records Act 2000*.

The CLC agreed that these additional words would not be included in the Terms of Reference but a summary of the requirement and how it is achieved would be included in the IWDF Information Handbook.

It was acknowledged that all agreed changes to Section 1.3 Terms of Reference would also be made in the Expression of Interest – Community Representative and the IWDF Information Handbook.

- At section 2.5 Meeting frequency
A request was made to remove the second sentence;
'In October 2011, the Office of the Environmental Protection Authority approved the request to modify the Proponent Commitment 8 from four meetings a year to once a calendar year until further notice.'

It was argued that this 'further notice' had been provided and the statement should no longer be included in the CLC Operational Guidelines. The CLC agreed that this statement should be removed from the Operational Guidelines.

TR submitted via email, 31st of March 2021, two suggestions for changes to the CLC Operating Guidelines for discussion. In TR's absence LM presented the suggestions to the CLC.

- At section 2.1 Membership
A request was made to include an additional point:

	<p><i>‘CLC members acknowledge the Department of Finance under legislative function are appointed the management authority responsible for the legislative and operational management of the IWDF.’</i></p> <p>After discussion it was agreed to include the statement but to modify the wording to: <i>‘CLC members acknowledge the Department of Finance, under Ministerial Approval issued by the Minister for the Environment, manages the IWDF on behalf of the Minister for Works.’</i></p> <ul style="list-style-type: none"> • At section 2.4 CLC Operational Decisions <i>Decisions relating to the operation of the CLC will be made by majority agreement to be changed to: Proposed actions relating to the purpose and function of the CLC will be made by majority agreement in accordance with section 1.3 (Terms of Reference).</i> <p>The CLC agreed to this proposed change.</p>	
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>LM reported that there have been three chemical and eight radioactive waste enquiries since December 2020.</p> <p>8.2 Waste Acceptance Applications</p> <p>LM reported that there have been eleven approved radioactive waste disposal applications since December 2020.</p> <p>JMcL asked if one of the approved waste applications was the owner of radioactive waste considered for the 2020 disposal but was not disposed due to the radioactive waste disposal being put on hold pending discussions with the Radiological Council.</p> <p>LM responded that the radioactive waste owner referred to above remains interested in disposal should a radioactive disposal occur.</p>	
9.0	<p>General Business</p> <p>9.1 IWDF Brochure and Information Handbook</p> <p>It was reported that the IWDF brochure and Information handbook was now available on the wa.gov.au website.</p> <p>AK requested that a link to the actual documents be provided.</p> <p>The following link takes the user to the web page for the IWDF, and both the brochure and handbook can be found at the bottom of this page:</p> <p>https://www.wa.gov.au/organisation/department-of-finance/mt-walton-east-intractable-waste-disposal-facility</p>	

9.2 National Repository

JMcL reported that she had heard on ABC radio a discussion about the proposed National Radioactive Waste Repository. JMcL reported that the *National Radioactive Waste Management Amendment (Site Specification, Community Fund and Other Measures) Bill 2020* is currently before the Federal Parliament but is stalled in the Senate. The Shire of Leonora was interested in providing a site for the National Radioactive Waste Repository.

JMcL stated that the issue of the National Repository has been discussed by the CLC many times over the last twenty years and is of interest to the CLC as it directly relates to the issue of Condition 7 of Ministerial Statement 562 restricting the IWDF to waste generated in Western Australia and the request made by the CLC to the proponent to consider requesting a change to this condition.

JMcL quoted directly from the Extract from Hansard [COUNCIL — Wednesday, 23 September 2020] p6327b-6327b, Hon Robin Scott; Hon Sue Ellery.

HAZARDOUS WASTE FACILITIES — MT WALTON AND FORRESTDALE

1014. Hon ROBIN SCOTT to the Minister for Environment:

I refer to ministerial statement 562, specifically commitment 7, which has the effect of preventing the intractable waste facility at Mt Walton from being used to process waste from areas outside our state.

(1) Is there a way in which the ministerial statement can be amended to allow for waste outside WA to be processed?

(2) If yes to (1), what is the process?

(3) Is the government open to considering submissions for why the Mt Walton facility should allow waste from interstate to be processed?

Hon SUE ELLERY replied:

On behalf of the Minister for Environment, I thank the honourable member for some notice of question.

(1) Yes.

(2) The Department of Water and Environmental Regulation has advised that a change of this nature is likely to constitute a revised proposal and require a valid referral under section 38 of the Environmental Protection Act 1986.

(3) The state government has no plans to make any changes to ministerial statement 562.

ESJ replied that the question has been put to the government and answered.

ESJ further responded that changes to condition 7 of Ministerial Statement 562 were discussed at the December CLC meeting and it was not appropriate to comment further.

JMcL commented that the sentence “*The Department of Finance has no intention of expanding the facility to accept interstate waste*” used by the

Minister for the Environment was of concern as the IWDF did not need to be expanded to accept interstate waste.

MC asked if the CLC community representatives had consulted with the communities they represent to ensure they are supportive of the request to accept waste from outside Western Australia.

JMcL responded that the precedent had been set as the Western Australian community had few concerns with the recent proposal for and subsequent approval of the Sandy Ridge Facility. The Sandy Ridge Facility, six kilometres to the west of the IWDF, has approval to dispose of interstate waste.

9.3 Time Allocated for CLC Meetings

AK and JMcL indicated that more flexibility is needed for the time allocated to CLC meetings.

A request was made to book the meeting room for a longer period so that agenda items can be addressed without time restricting discussions.

It was agreed that the booking for the meeting venue would be extended for the next meeting.

BC suggested that the meetings could be conducted using Zoom or Teams to reduce the time and cost of the meetings. It was noted that it is possible to record zoom meetings, but individual permissions would be required to do this.

JMcL expressed a preference for face-to-face meetings.

It was agreed that the options for meetings should be investigated for the next meeting.

9.4 DWER Licence

ESJ reported that the Action Plans had been updated to include the requirement to address a request to change Condition 2 of the DWER Licence from 3 months to 28 days when the draft renewal is received.

9.5 Planning the dates for 2021 CLC Meetings

ESJ referred the CLC to the previous meeting where the frequency of CLC meetings was discussed and the majority of the CLC preferred three meeting per year.

ESJ therefore proposed that the following dates be fixed for the next four CLC meetings:

10th of June 2021

14th of October 2021

10th of February 2022

19th of June 2022

	<p>The proposed meeting dates were agreed by the CLC.</p> <p>9.6 Expression of interest from Suzie Williams</p> <p>LM reported that an EOI had been received from Suzie Williams to become a community representative from the Shire of Coolgardie.</p> <p>LM reported that she would circulate the EOI to the CLC for their consideration next week.</p>	
10.0	<p>Close / Scheduling of Next Meeting</p> <p>10.1 The meeting closed at 12:20 pm.</p> <p>10.2 Next meeting:</p> <p>10th of June 2021.</p>	

APPENDIX N

2020 – 2021 Rehabilitation Inspection Records

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

REABILITATION MONITORING RECORD IWDF-FORM-38A

Project No.: DF/2020-001 ANIMO		Storage Location of Photos: Aurora Environmental		Monitored By: MJJ								
Site Name: Intractable Waste Disposal Facility, MI Walton East		Client: Department of Finance		Date: 29/10/2020								
Monitoring Location: IWDF		Vegetation Density		Vegetation Variety								
Trench Area	Loc. No.	Date	Time	% Cover	Max height	Average height	Y/N	Number of plant types	Soil Status	Dead veg? Y/N	Trenched?	Other Comments
2020NRT01	01	28/10/2020	10:37	1	0.1	0.1	N	1	Gravelly Sand	Y	Y	New trench
	02	28/10/2020	10:41	0	0.0	0.0	N	0	Gravelly Sand	Y	Y	New trench
	03	28/10/2020	10:45	0	0.0	0.0	N	0	Gravelly Sand	Y	Y	New trench
2008RT01	01	28/10/2020	10:19	60	4.0	1.4	Y	9	Gravelly Sand	Y	Y	
	02	28/10/2020	10:24	65	2.0	1.2	Y	7	Gravelly Sand	Y	Y	
	03	28/10/2020	10:28	60	2.0	0.8	Y	8	Gravelly Sand	Y	Y	
2002RT01	01	28/10/2020	10:02	60	2.0	1.5	Y	8	Gravelly Sand	Y	Y	
	02	28/10/2020	10:06	35	1.9	0.9	Y	7	Gravelly Sand	Y	Y	
	03	28/10/2020	10:11	60	2.5	1.4	Y	8	Gravelly Sand	Y	Y	
2000RT01	01	28/10/2020	9:29	70	3.5	2.0	Y	9	Gravelly Sand	Y	Y	
	02	28/10/2020	9:32	25	3.0	0.7	Y	8	Gravel	Y	Y	
	03	28/10/2020	9:35	50	4.0	1.3	Y	9	Gravel	Y	Y	
98NRT02	01	28/10/2020	8:14	80	3.0	1.7	Y	8	Gravelly Sand	Y	Y	
	02	28/10/2020	8:18	40	3.5	1.6	Y	6	Gravelly Sand	N	Y	
	03	28/10/2020	8:25	75	2.0	1.8	Y	8	Gravelly Sand	Y	Y	
88NRT01	01	28/10/2020	8:30	70	4.0	2.1	Y	7	Gravelly Sand	Y	Y	
	02	28/10/2020	8:34	60	2.0	1.7	Y	6	Gravelly Sand & Clay	Y	Y	
	03	28/10/2020	8:42	65	2.5	1.7	Y	8	Sandy	Y	Y	
87NRT02	01	28/10/2020	9:45	85	2.5	1.7	Y	8	Sandy	Y	Y	
	02	28/10/2020	9:51	25	2.5	1.5	Y	7	Stoney Sand & Gravel	Y	Y	Grading of drain caused some loss of plants
	03	28/10/2020	9:21	45	2.0	1.5	Y	9	Sandy Gravel	Y	Y	Grading of drain caused some loss of plants
97NRT01	01	28/10/2020	9:24	60	3.0	1.6	Y	9	Sandy Gravel	Y	Y	
	02	28/10/2020	9:28	25	2.5	1.8	Y	7	Sandy Gravel	N	N	
	03	28/10/2020	8:42	65	4.5	1.8	Y	6	Gravel & Sand	Y	N	
96NRT01	01	28/10/2020	8:45	50	2.0	1.5	Y	8	Sand, Clay & Gravel	Y	N	
	02	28/10/2020	8:51	50	2.5	1.4	Y	7	Gravel & Sand	Y	Y	
	03	28/10/2020	8:07	80	3.0	1.6	Y	6	Sand & Gravel	Y	N	
94NRT02	01	28/10/2020	8:09	55	2.5	1.6	Y	7	Sand & Gravel	N	N	
	02	28/10/2020	8:01	45	2.5	1.8	Y	7	Sand & Gravel	Y	N	
	03	28/10/2020	8:03	45	2.0	1.5	Y	7	Sand & Gravel	Y	N	
94RT01	01	28/10/2020	7:41	80	3.0	1.8	Y	8	Sandy	Y	N	
	02	28/10/2020	7:43	85	3.0	1.7	Y	9	Sandy	Y	N	
	03	28/10/2020	7:46	65	3.0	1.6	Y	8	Sandy	Y	N	
92RS01H4RS01	01	28/10/2020	7:32	35	3.0	1.7	Y	9	Sand & Gravel	Y	N	
	02	28/10/2020	7:34	70	4.0	1.8	Y	8	Sandy	Y	N	
	03	28/10/2020	7:37	70	2.5	1.7	Y	9	Sandy	Y	N	

IWDF MT. WALTON EAST

**REHABILITATION
PHOTOS**

OCTOBER 2020



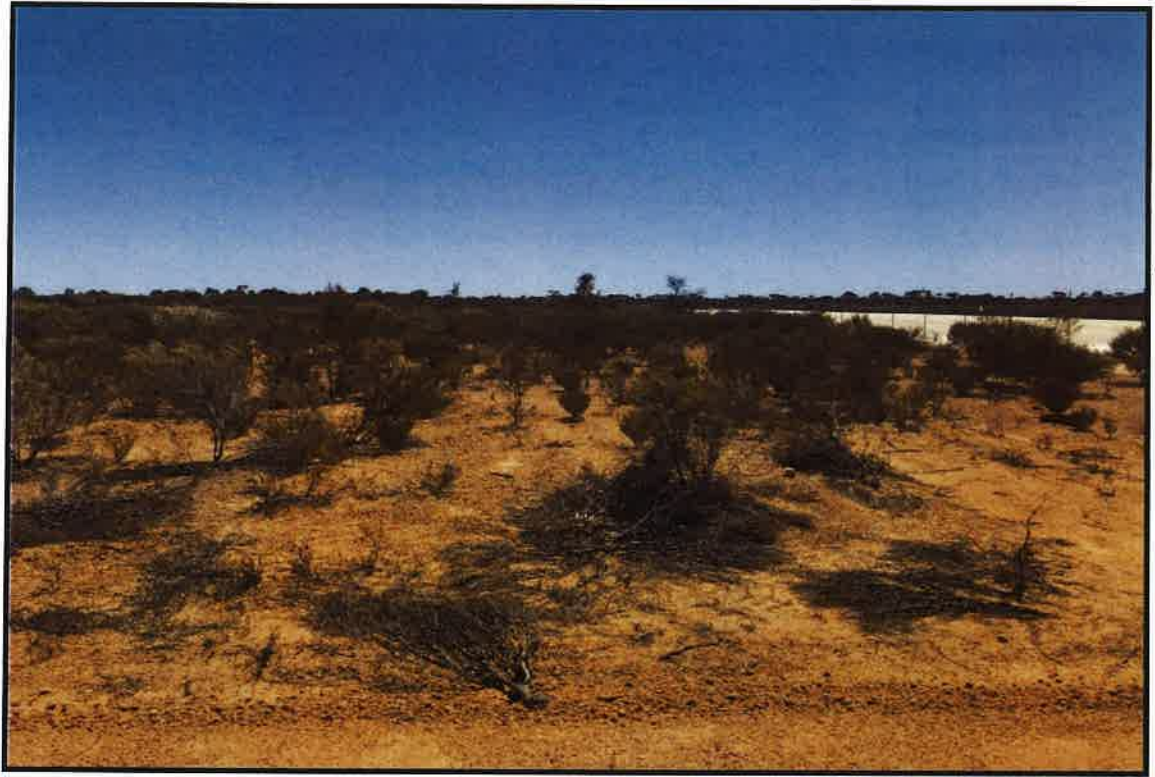
2020NRT01 - Loc.1



2020NRT01 - Loc.2



2020NRT01 - Loc.3



2008RT01 - Loc.1



2008RT01 - Loc.2



2008RT01 - Loc.3



2002RT01 - Loc.1



2002RT01 - Loc.2



2002RT01 - Loc.3



2000RT01 - Loc.1



2000RT01 - Loc.2



2000RT01 - Loc.3



1998NRT01 - Loc.1



1998NRT01 - Loc.2



1998NRT01 - Loc.3



1998NRT02 - Loc.1



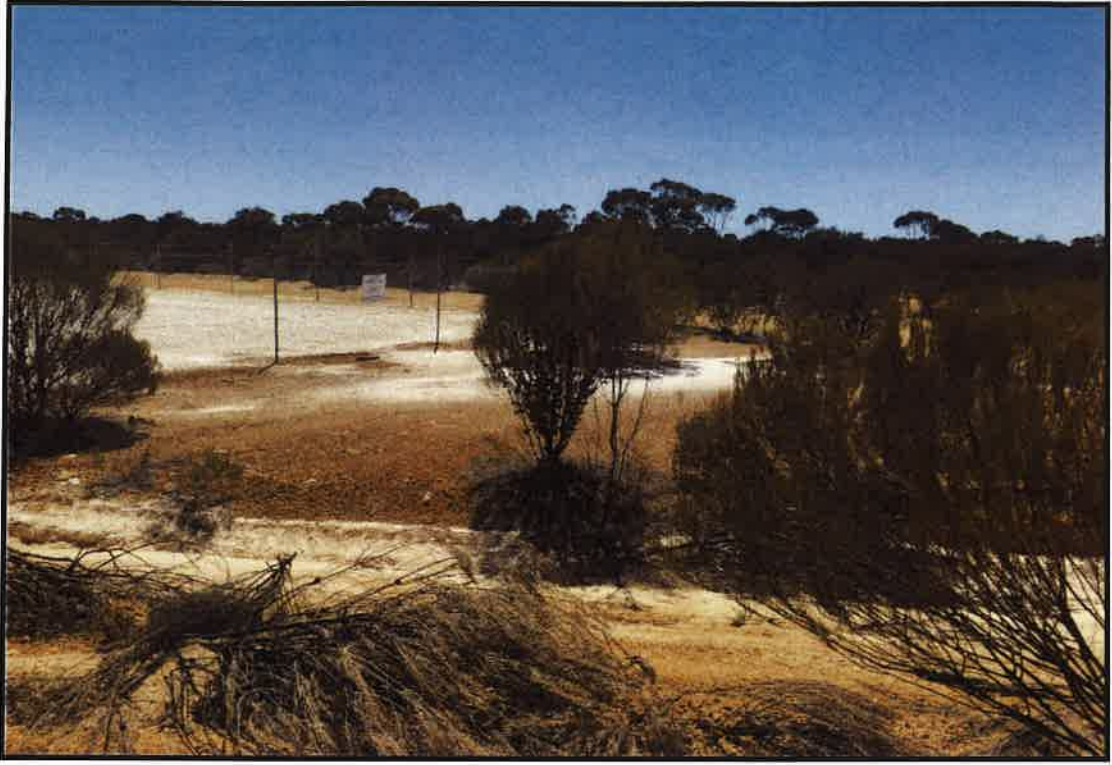
1998NRT02 - Loc.2



1997NRT01 - Loc.1



1997NRT01 - Loc.2



1997NRT01 - Loc.3



1997NRT02 - Loc.1



1997NRT02 - Loc.2



1997NRT02 - Loc.3



1996NRT01 - Loc.1



1996NRT01 - Loc.2



1996NRT01 - Loc.3



1994RT01 - Loc.1



1994RT01 - Loc.2



1994RT01 - Loc.3



1994NRT01 - Loc.1



1994NRT01 - Loc.2



1994NRT02 – Loc.1



1994NRT02 – Loc.2



1992RS01/1994RS01 - Loc.1



1992RS01/1994RS01 - Loc.2



1992RS01/1994RS01 - Loc.3

APPENDIX O

2020 – 2021 Management System Manuals



**INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST
ENVIRONMENTAL, HEALTH & SAFETY AND QUALITY MANAGEMENT SYSTEM
(EHSQMS)**

**MANAGEMENT AND POLICY MANUAL
DEPARTMENT OF FINANCE**

This Manual is the Environmental, Health and Safety and Quality Policy, Organisational Structure, and Procedures as adopted by the Department of Finance (Finance) for the management of the Intractable Waste Disposal Facility, Mt Walton East (IWDF).

This Management and Policy Manual is intended to provide an overview of policy, corporate status, and of the Management System itself.

This Management and Policy Manual should be read in conjunction with the relevant procedures and attachments.

Rev	Date	Description	Prepared by:	Checked by:	Approved by:
1		Draft			
1.1	26/08/07	Draft	LDM	MJS	
2	10/09/07	Final	LDM	MJS	MJS
3	01/03/10	Draft	LDM	RH	
4	15/08/10	Final	LDM	RH	RH
4.1	01/07/11	Draft	LDM	RH	
5	14/08/11	Final change of proponent details	LDM	RH	RH
5.1	12/09/12	Update Section 4 DEC to OEPA	LDM	RH	RH
6	06/09/13	Update Sections 2,4 & 5 & change DEC to DER	LDM	RH	RH
7	12/06/14	Minor corrections and update to Section 3.3	LDM	LM & RH	RH
8	10/11/14	Review and comment on Environmental & Quality policy for discussion at next MRM	LDM	LM & RH	
9	14/09/15	Update to env policy – new ISO 14001 & 9001	LDM	LM & RH	MT
10	23/10/16	update to section 3.3	LDM		MT
11	31/05/17	Update to EHSQ Policy	LDM	MJS	MT
12	24/10/17	Inclusion of signed EHSQ policy, pagination & version #, also updated RSO info	LDM	MJS	
13	21/11/18	Update to naming of govt depts., review of policy, update to summary of disposal, governance	LDM	MJS	MT
14	14/11/19	Review – branding change	LDM	MJS	MT
15	22/03/21	Update to include 2020NRT01, minor change to Policy title, update to governance structure figure, minor change to Policy ISO standard naming	LDM	MT	MT

MT – Management Team

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**ENVIRONMENTAL, HEALTH & SAFETY AND QUALITY POLICY
INTRACTABLE WASTE DISPOSAL FACILITY**

The Department of Finance is responsible for the management of the Intractable Waste Disposal Facility (IWDF), owned by the State Government of Western Australia. The objective of intractable waste disposal is to isolate the waste permanently from the community and the environment as safely and economically as possible.

COMMITMENT

The Department of Finance is committed to minimising the impact of the IWDF and its operations on the environment, IWDF personnel and the general community of Western Australia. This commitment will be achieved through the continual implementation of the Environmental and Health & Safety and Quality Management System (EH&SQMS) which is consistent with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

OBJECTIVES

The objectives of the IWDF EH&SQMS are to ensure:

1. the requirements of all statutory obligations, standards, specifications and codes or practice relevant to the operation of the IWDF are fulfilled or exceeded;
2. that the IWDF is operated to the highest standards of public sector management;
3. the use of recognised current best practices, such as pollution prevention practices for all activities at the IWDF;
4. continual awareness of international advances in technologies relevant to the operation of the IWDF;
5. the continued adequacy and suitability of the Environmental, Health & Safety and Quality Policy and the EH&SQMS through a process of maintaining, monitoring, reviewing, auditing and continually improving;
6. that all personnel involved in IWDF management and operations are appropriately educated and trained in order to continually improve professional skills, awareness and knowledge of the issues and practices;
7. direct liaison with the community of Western Australia on all operational activities and outcomes; and
8. that all disposal details, monitoring and auditing records, are both publicly available and securely stored for future reference.

RESPONSIBILITIES

Senior Management will provide the resources and framework for setting objectives, targets and detailed actions as well as specifying review periods for assessing their continued suitability.

All IWDF personnel are responsible for implementing this policy and the processes developed to achieve the expectations of this policy within the area of their responsibility,

REVIEW

This policy will be reviewed annually for ongoing suitability by the management team.

Signed: Emma Savage-Jones
Director,

Date: 03/06/2021

1. IWDF SITE INFORMATION

1.1 Overview

Prior to the establishment of the Intractable Waste Disposal Facility (IWDF), Mt Walton East in 1992, thorough studies and investigations were undertaken to ensure that the site had suitable geological, meteorological, and hydrogeological characteristics and contained no areas of particular environmental, economic, agricultural or cultural importance. Studies in the following areas helped in the establishment of appropriate objectives and management plans for the site.

1.2 Aboriginal and Archaeological Significance

A study of ethnographic and archaeological sites at and near the IWDF was conducted in 1988 prior to the commissioning of the site and included consultation with Aboriginal leaders in the region. The study concluded that there were no sites of Aboriginal or archaeological significance within a 15-kilometre radius of the site.

1.3 Flora and Fauna

Several flora and fauna surveys of the region have been undertaken since 1988. While no declared rare flora has been discovered at the site, some priority species have been identified and measures are now in place to ensure these species are conserved.

1.4 Groundwater

The IWDF lies in an area where the regional water table is absent. Despite extensive drilling over the site no groundwater has been encountered down to bedrock. Any water derived from rainfall either evaporates or infiltrates the colluvial sediments on the site, where it eventually percolates to the top of the silcrete layer before either being taken up by plants, evaporating or migrating slowly off site. Water migration off-site would eventually drain into the colluvial and alluvial sediments of the ancient drainage systems located on the east and west of the IWDF site. Groundwater in these drainage areas is generally saline to hypersaline and has no agricultural or human use.

In 1995, two monitoring bores were constructed to bedrock to investigate groundwater conditions adjacent to the existing radioactive waste and chemical waste disposal area and were dry at the time of construction. Subsequent monitoring has not found any groundwater in either of these monitoring bores. In 1999, six further monitoring bores were constructed down to bedrock in the general vicinity of the chemical and radioactive waste disposal area. In 2009, an additional monitoring bore was constructed down to bedrock in the vicinity of the 2008 disposal trench. Groundwater monitoring to date has not found any groundwater in any of these monitoring bores.

1.5 **Geology**

The IWDF lies in the central eastern portion of the Achaean Yilgarn Block, a tectonically stable, ancient craton comprising of granitic rocks and intervening greenstone belts which contain a variety of volcanic, metamorphic, and sedimentary rocks. The Yilgarn block generally has low seismic activity.

In geological terms the IWDF site is typical of areas overlying deeply weathered granite domes. The profile generally comprises four main lithologies and from the surface these are:

1. Colluvial sand - comprises yellow brown quartz sand overlying nodular red brown clayey sand. It averages about 1.5 m thick;
2. Silcrete - comprises kaolinitic clay which has been variably indurated with silica to form a hard cap over underlying lithologies. This cap averages about 3 m thick.
3. Kaolinitic clay – comprises soft white kaolin weathered from preexisting granite. As a result the clays contain relict quartz phenocrysts. This important profile houses the buried waste and is generally more than 15 m thick over the site. It is absent in several areas, especially where the bedrock is shallow, but elsewhere has a maximum thickness of 32.5 m.
4. Granitoid Basement- comprises a fine to medium grained leucocratic granite containing pegmatite and quartz veins. The basement topography varies over the site from 3.5 m to 47 m below the surface.

The lack of a groundwater table and the thickness of the kaolinitic clay profile are the key geological attributes of the site in terms of its function as an intractable waste repository because they preclude the transport of contaminants off-site.

2. PROPONENT HISTORY

Health Department of Western Australia (1992 to September 1996)

The IWDF was the initiative of the Health Department of Western Australia who was responsible for establishing the IWDF to enable the disposal of low-level radioactive waste collected over many years and stored in the radioactive waste depository at the Radiation Health Section of the Department of Western Australia.

Although the Health Department was the legal proponent for the IWDF until around September 1996 the operational responsibility for the IWDF was transferred to the Environment portfolio in 1994.

Department of Environmental Protection WA (October 1996 to 30 June 1998)

Operations were undertaken directly by the Department of Environmental Protection (DEP) and the works performed by the DEP Waste Operations Team.

Waste Management (WA) (1 July 1998 to January 2005)

Following amendments to the *Environmental Protection Act 1986* (EP Act) which took effect on 1 July 1998, and consequent completion of formal documentation in November 1998, Waste Management (WA) (WM (WA) a body corporate of the then DEP, became the proponent for operation of the IWDF under the EP Act. The IWDF was owned and operated by WM (WA) on behalf of the Western Australian Government. The IWDF site was operated under Ministerial Direction and was therefore monitored by the EPA.

WM (WA) was the operator of the IWDF, and senior officers in the DEP, working for WM (WA), managed the IWDF site.

WM (WA) did not require a licence or other authorisations as conferred by the EP Act, to undertake a waste management operation at the IWDF. It was taken that WM (WA) complied with all the provisions of the EP Act. However, the standard environmental and regulatory approvals were required in relation to the specifics of each waste management operation. WM (WA) was also obliged to perform operations under the directions of the Minister of the Environment and where instructed.

WM (WA) as the proponent for the IWDF accepted responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

Department of Housing and Works (February 2005 to January 2009)

In February 2005, responsibility for the IWDF was transferred to the Department of Housing and Works (DHW) and DHW was subsequently designated as the proponent for the IWDF for the purposes of environmental approval under part IV of the *Environmental Protection Act 1986*.

Management Orders issued under the *Land Administrations Act 1997* vested the reserve upon which the IWDF is located in the Minister for Works care of the Department of Housing and Works. DHW as the proponent for the IWDF accepted responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

Department of Treasury and Finance, Building Management & Works (February 2009 – June 2011)

In February 2009, as a result of a change of government in Western Australia, the 'Works' function of the Department of Housing and Works, was transferred to the Department of Treasury and Finance, Building Management and Works (DTF/BMW).

Responsibility for the management and operation of the IWDF was transferred to the DTF/BMW along with other 'works' functions of the DHW at this time. DTF/BMW as the proponent for the IWDF accepted responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

Department of Finance (July 2011- current)

On 1 July 2011, the Department of Treasury and Finance was renamed to the Department of Finance. At the same time, the State Revenue, Government Procurement, Building Management and Works and Shared Services functions of the Department of Treasury and Finance were transferred to the newly created Department of Finance.

Responsibility for the management and operation of the IWDF was transferred to the Department of Finance along with other 'works' functions of the DTF at this time. Department of Finance as the proponent for the IWDF accepts responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

3. SITE LICENCE AND REGISTRATION INFORMATION

3.1 Environmental Licence

The IWDF is licensed by the Western Australian Department of Water and Environmental Regulation (DWER) (previously the Department of Environment Regulation (DER)) under Part V the *Environmental Protection Act 1986*, as a Prescribed Premises - Category 66 Class V intractable landfill site.

The IWDF Environmental Licence L8190/2007/1 includes two conditions which are as follows:

1. Reporting Conditions -- requiring the Licensee to provide an Annual Audit Compliance report to the Director of the Environmental Regulation Division by 1 March each year.
2. Notification of Intention to Dispose -- requiring the Licensee to notify the Director of the Environmental Regulation Division in writing three months prior to the delivery of waste at the IWDF.

3.2 Management Orders

Management Orders issued under the *Land Administrations Act 1997* vest the reserves upon which the IWDF and the 100 km IWDF access road with the Minister for Works.

3.3 Radiological Council Registration

The IWDF is required under the *Radiation Safety Act 1975* to be registered with the Radiological Council of Western Australia (RCWA) as premises in which radioactive substances are used, stored or manufactured. The registration is usually issued for a period of three years.

The RCWA registration RS 13/2011 20590 for 10 February 2020 to 8 February 2023 names the registrant as Emma Savage-Jones, Director Building Management, Department of Finance and Stuart Parr as the RCWA approved RSO for the IWDF.

With exception of the deletion of a duplicated condition the conditions, restrictions and limitations of the renewed registration remain the same as the previous registration.

3.4 Permit to Possess Nuclear Material

Australia has enacted the *Nuclear Non-Proliferation (Safeguards) Act 1987* to ensure that international obligations are met under the Nuclear Non-Proliferation Treaty (NPT). This Act is only concerned with nuclear materials such as uranium, thorium, and plutonium.

As there are small quantities of thorium and uranium disposed at the IWDF the facility is required to have in place a 'Permit to Possess Nuclear Material'. This permit (PN207) requires Finance to report, annually to ASNO, its inventory of nuclear materials and a description of each building containing nuclear materials.

4. SUMMARY OF DISPOSAL OPERATIONS AT THE IWDF

Since 1992, fourteen disposal cells have been established at the IWDF. For each cell, a summary of waste disposed, and dimensions is provided below.

92RS01 - Radioactive waste, Health Department

The waste comprised numerous small radioactive sources including a variety of teaching, research, hospital, and industrial wastes held in store by the Radiation Health Section of the Health Department Western Australia. The waste was packaged into 60 litre drums that were filled with cement slurry. The 60 litre drums were placed in 205 litre steel drums that were filled with concrete to remove voids. A total of 66 x 205 litre drums and a one-metre-long cylinder were disposed of at the IWDF by progressively concreting them in place in a two-metre diameter, 28 metres deep shaft, located in the Radioactive Waste Disposal Area. The waste is located 5.8 metres below ground level.

92RS02 - Radioactive waste, Health Department

The waste consisted of numerous small radioactive items held in store by the Radiation Health Section of the Health Department Western Australia. The waste was packaged into 60 litre steel drums backfilled with cement slurry. The drums were then placed into 205 litre steel drums that were backfilled with cement to remove voids. A total of 69 205 litre steel drums were then progressively concreted into place in a 27-metre-deep by two metre diameter shaft located in the Radioactive Waste Disposal Area. The waste is located 5.8 metres below ground level.

94RT01 - Radium contaminated equipment, CSBP and Farmers Ltd

The waste consisted of process equipment contaminated with radium. The contaminated equipment originated from CSBP & Farmers Ltd and was transported to the IWDF in three 6 metre shipping containers. The void spaces in the shipping containers were filled with cement slurry at the IWDF. Disposal was in a 40-metre-long, 3-metre-wide and 8-metre-deep trench located in the Radioactive Waste Disposal Area. The waste is located 4.5 metres below ground level.

94NRT01 - Pesticides, Health Department

The waste consisted of household pesticides stockpiled by the Pest Control Unit of the Health Department of Western Australia. The waste was packaged into 18 205 litre steel drums, which were then backfilled with cement slurry to preclude voids. The drums then disposed of in a 3.5-metre-long, 2.5-metre-wide and 4-metre-deep trench located in the Chemical and Radioactive Waste Disposal Area. The waste is located 2.8 metres below ground level.

94NRT02 - Arsenic waste, Department of Agriculture

Waste consisted of arsenical sheep dip wastes stockpiled by the Department of Agriculture after its use was banned in Western Australia. The waste was packaged in 219 205 litre steel drums, transported to the IWDF, and then disposed of in an 18-metre-long, 5-metre-wide, and 5-metre-deep trench in the Chemical and Radioactive Waste Disposal Area. The waste is located 3.8 metres below ground level.

96NRT01 - Contaminated soil, Department of Agriculture

Waste consisted of soil contaminated with the organochlorine pesticide DDT and toluene that resulted from the spillage of 20,000 litres of Dichlorodiphenyltrichloroethane (DDT) mixture. The spill occurred from a ruptured tank at the Wongan Hills Agricultural Research Station operated by the then Agriculture Western Australia.

Some bulk waste contaminated with DDT and toluene was also disposed of in the trench. This bulk waste included personal protective equipment worn by people working on the packaging and disposal operation. Also included, was contaminated concrete from the floor of a shed at the research station that was in the path of the spill, and tarpaulins used to cover the spill area at Wongan Hills to prevent rainwater incursion before site remediation.

The waste was packaged in 1,012 two-tonne capacity bulka bags and disposed of in a 55-metre-long, 8-metre-wide, 8-metre-deep trench located in the Chemical and Radioactive Waste Disposal Area. The waste is located 4.5 metres below ground level.

97NRT01 - Arsenic trioxide, Kanowna Belle Gold Mines

Waste consisted of arsenic trioxide generated as a by-product of gold extraction by Kanowna Belle Gold Mines. The waste was packaged into 986 bulka bags, weighing on average 0.65 tonne. Arsenic levels in the waste averaged 25% and were all below 70%.

The waste was disposed of in a trench in the Chemical and Radioactive Waste Disposal Area that was 9.5 metres deep, 80 metres long and 9 metres wide. The waste is located 6.0 metres below ground level.

97NRT02 - Arsenic waste, Wesfarmers CSBP

Waste consisted of arsenic generated as a by-product of the vetrocoke process in the production of ammonia by Wesfarmers CSBP Ltd at its fertiliser and chemical facility in Kwinana.

The waste was packaged in 1,662 220 litre high-density polyethylene (HDPE) over drums placed within bulka bags, and 308 60 litre HDPE drums with three drums per bulka bag. Used personal protective equipment and materials from the packaging activities were placed in 37 bulka bags and buried in the trench.

Composite and random samples indicated that the arsenic concentration in the waste ranged from 1.5% to 33.6%. The waste was disposed in a 14.3-metre-deep trench in the Chemical Waste Disposal Area, with base dimensions of approximately 55 metres long and 7 metres wide. The waste is located 9.0 metres below ground level.

98NRT01 - Arsenic trioxide waste, Kanowna Belle Gold Mines

Arsenic trioxide waste generated as a by-product of gold extraction by Kanowna Belle Gold Mines. The waste was packaged into 748 bulka bags, weighing on average 0.65 tonne. Arsenic levels in the waste ranged from 2% to 50% arsenic (average 27%). The waste was disposed of in the Chemical and Radioactive Waste Disposal Area in a 12.4-metre-deep trench with base

dimensions of approximately 42 metres long and 12 metres wide. The waste is located 8.0 metres below ground level.

98NRT02 - PCB contaminated soil, Stephenson and Ward Site

The waste comprised polychlorinated biphenyl (PCB) contaminated soil from the remediation of the Stephenson and Ward incinerator site in Welshpool. The waste was packaged into 103 bulka bags weighing 1.2 to 2.0 tonnes. PCB concentrations in the waste varied between 59 to 9,200 milligrams per kilogram. The waste was disposed of in the Chemical Waste Disposal Area in a 12.4-metre-deep trench with base dimensions of approximately 13 metres long and 8.5 metres wide. The waste is located 7.5 metres below ground level.

2000RT01 - Radioactive and chemical waste, various waste owners

This 2000 disposal at the IWDF involved the burial of 2,905.8 cubic metres of radioactive and non-radioactive wastes, originating from twelve different companies and government agencies.

Excavation began at the site in early January, with the construction of a specifically designed disposal trench, measuring 56 metres long, 12 metres wide and 13 metres deep.

Acceptance of chemical wastes commenced in early March and was completed by mid-April. The first consignment of waste consisted of 1,483 bulka bags of arsenic powder, and 96 bulka bags of used filters and arsenic contaminated personal protective equipment from Kanowna Belle Gold Mines. Following this, 192 205 litre drums of arsenic sludge from vetrocoke processes from Wesfarmers CSBP, 20 x 205 litre steel drums of vanadium powder and six 205 litre drums of arsenic trioxide and dried ferric/calcium arsenate sludge from AMMTEC Pty Ltd were disposed. Arsenic contaminated wastes packaged in 23 x 205 litre drums, one hazspill drum and three steel bins of arsenic were also accepted at the site from Agriculture Western Australia. In addition to this 240 x 205 litre steel drums, packaged in steel bins from Nufarm Pty Ltd, containing mixed organic chemicals originating from pesticides manufacture, were also disposed.

Following the burial of all the chemical wastes, 64 x 205 litre steel drums of low-level radioactive waste were disposed of. A specially constructed clay barrier separated the radioactive and chemical waste.

The Health Department made up most of the radioactive waste consignment with 50 205 litre drums of exit signs and gauge sources. The Department of Conservation and Land Management (2 x 205 litre drums of soil moisture gauge sources), Radiation Safety Services (4 x 205 litre drums of industrial gauge sources), Simsmetal (1 x 205 litre drum of contaminated scrap metal), Agriculture Western Australia (4 x 205 litre drums of soil moisture gauge sources), North Ltd (1 x 205 litre drum containing XRF instrument source) and Advanced Manufacturing Technology Centre (2 x 205 litre industrial gauge sources) constituted the rest of the consignment.

Construction of the water shedding dome for the trench was completed and the site demobilised in early June. The waste is located 8.0 metres below ground level.

2002RT01 - Radioactive and chemical waste, various waste owners

The 2002 disposal was conducted between April 2002 and October 2002 and involved the burial of radioactive and non-radioactive wastes, originating from six different companies and government agencies.

The chemical and low-level radioactive wastes were co-disposed in a trench, designated Trench 2002RT01, in the Chemical and Radioactive Waste Disposal Area at the IWDF site.

The chemical waste consisted of 21 x 6 metre and one x 12 metre sea containers and 92 x 205 litre drums of arsenic trioxide contaminated solids from the decommissioning of plant at Wesfarmers' Kwinana Fertiliser Operation and 30 x 205 litre drums of arsenic-based products collected during the Chem Collect program.

Following burial of the chemical waste a clay barrier was constructed to ensure separation of the radioactive waste from the chemical waste and then the 5 x 205 litre drums and one concrete encased safe containing low level radioactive waste were placed in the trench. A multi-layer, compacted cap was then constructed to secure the waste.

The radioactive waste was packaged into 60 litre steel drums backfilled with cement slurry. The drums were then placed into 205 litre drums that were backfilled with cement to remove voids.

The disposal trench was constructed to a depth of 14.6 metres, a width of 12 metres and a length of 19 metres. Construction of the water shedding dome for the trench was completed and the site demobilised in early October. The waste is located 9.2 metres below ground level.

2008RT01 - Radioactive and chemical waste, various waste owners

The 2008 disposal was conducted between January and October 2008 and involved the burial of radioactive and non-radioactive wastes, originating from eleven different companies, private citizens, and government agencies.

The chemical and low-level radioactive wastes were co-disposed in a trench, designated Trench 2008RT01, in the Chemical and Radioactive Waste Disposal Area.

The chemical waste consisted of 3,564 flexible intermediate bulk containers (FIBCs) of arsenic trioxide fume waste generated as a by-product of tantalum processing from Talison Minerals in Greenbushes, Western Australia.

Following the burial of the chemical waste a clay barrier was constructed to ensure separation of the radioactive waste from the chemical waste and then 62 x 205 litre steel drums containing low level radioactive waste were placed in the trench. A multi-layer, compacted cap was then constructed to secure the waste.

The radioactive waste was packaged into 60 litre steel drums backfilled with cement slurry. These drums were placed into 205 litre steel drums that were backfilled with cement to remove voids.

The disposal trench was constructed to a depth of 14 metres, a width of 26 metres and an overall length of 147 metres. Construction of the water shedding dome for the trench was completed and the site demobilised in early October. The waste is located 8.5 metres below ground level.

6.14 2020NRT01 - Contaminated piping, Water Corporation

The 2020 disposal operation was conducted between February and June 2020. The chemical wastes, originating from the Water Corporation, were disposed in a trench designated 2020NRT01 in the Chemical Waste Disposal Area.

Waste disposed consisted of 451 x 205 L steel drums, 29 x 1,000 L intermediate bulk containers (IBCs) containing bituminous pipe coating contaminated with asbestos and creosote which included polycyclic aromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs), one sea container containing contaminated solids and 1,200 lineal metres of pipe with bituminous pipe coating attached.

The disposal trench was constructed to a depth of 14 metres, a width of 26 metres and an overall length of 73 metres. The waste is located 8.5 metres below ground level.

5. ENVIRONMENTAL, HEALTH & SAFETY AND QUALITY MANAGEMENT SYSTEM

5.1 Overview

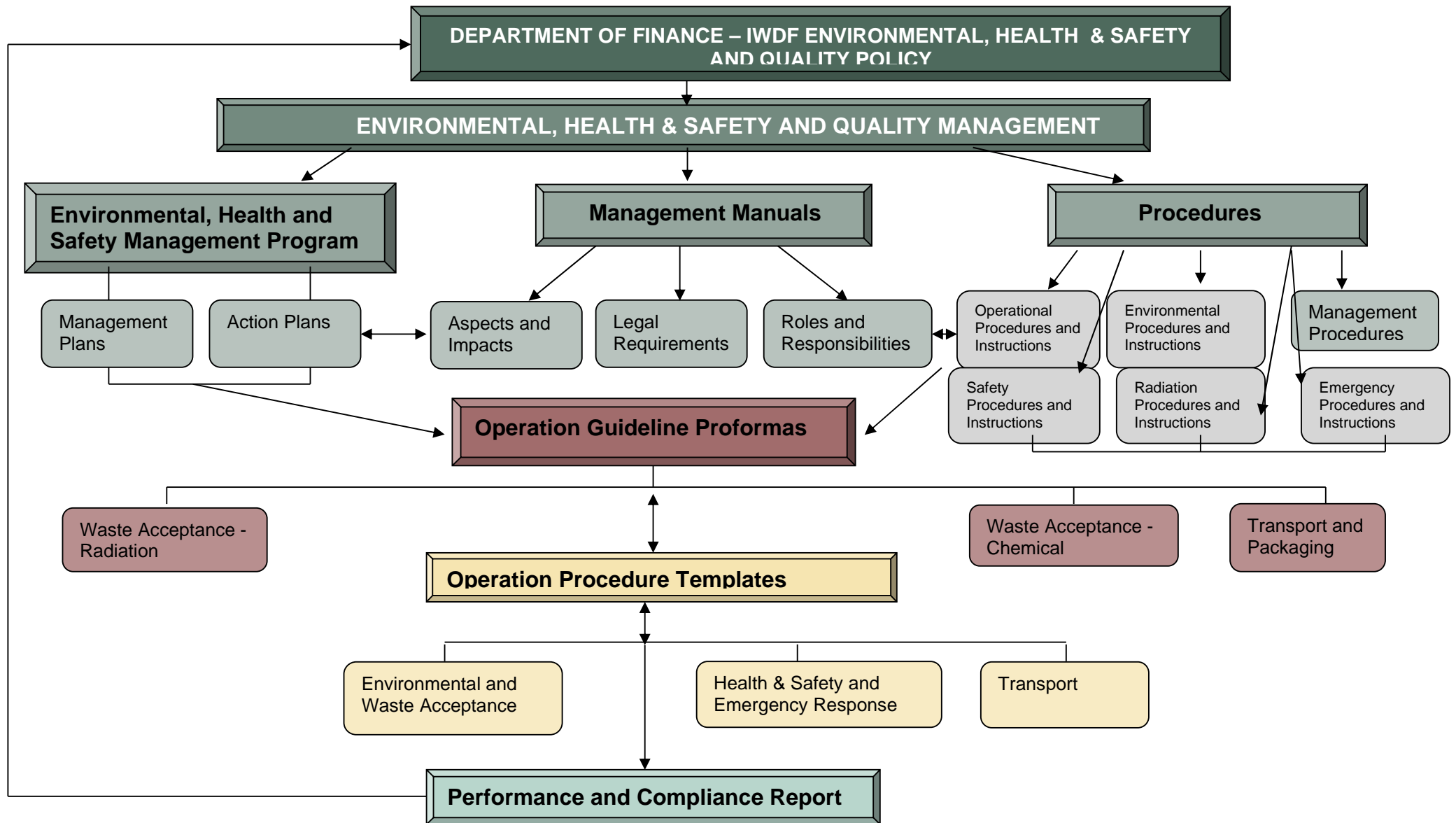
The IWDF Environmental, Health & Safety and Quality Management System (EH&SQMS) is designed to identify areas of actual or potential environmental risk resulting from activities at the IWDF and formulate procedures and objectives which minimise or eliminate these risks.

When correctly implemented the EH&SQMS will integrate environmental, quality and health and safety management into the IWDF's daily management, long term planning and other management systems, and ensure the Finance maintains a high level of performance.

The Facility Management Contractor (FMC), on behalf of Finance provide the resources required to achieve a quality service to customers, ensure employee work satisfaction and safety, and guarantee the community sound environmental performance through responsible and informed practices and decision making.

The EH&SQMS consists of the following components, as summarised in Figure 1.

FIGURE 1 Principal Environmental, Health and Safety Management System Documents



5.2 Management Manuals

There are two management manuals which contain central information about the management of the IWDF and provide an overview of the system.

The Finance management manual (this manual) provides details on the IWDF site and an overview of the components of the management system and how they interconnect.

The Finance management manual also contains the three subcomponents detailed below:

- a) *Legal Register*: The legal register details the major commonwealth and state legislation, which the IWDF must adhere to.
- b) *Aspects and Impacts Register*: Identifies all aspects of activities at the IWDF and provides environmental, socio-political, legal and health and safety consequence and risk ratings for the impacts of each aspect.
- c) *Roles and Responsibilities*: Details the responsibilities and activities of each position involved in the management of the IWDF. FMC roles are detailed more specifically in the FMC Organisational structure section.

The FMC management manual highlights the FMC's status and details the structure of the FMC procedures and the interaction with the Finance system.

5.3 Environmental, Health and Safety Management Program

The EMP provides the basis for the establishment and maintenance of effective management programs to achieve the standards, objectives, and targets for the IWDF, and to enable continual improvement in performance. It comprises of:

- a) *Management Plans*: These management plans are summary documents which have been developed to provide high level management goals, objectives, and targets for the following aspects of the IWDF's activities:

- Flora and fauna
- Water
- Air quality
- Decommissioning and rehabilitation
- Health and safety
- Emergency response
- Radiation
- Transport

The management plans summarise the methods (i.e., procedures and operational controls) that are in place and must be maintained to achieve the on-going management goals, objectives, and targets, and hence sustain operational performance.

b) *Action Plans*: These action plans detail Finance's specific improvement objectives, both long and short term, which strive for continual improvement in performance and provide quantitative targets, timeframes, and personnel for achieving these objectives.

5.4 Procedures

a) *Operation Guidelines*: These are templates, which have been developed to manage the performance of specific tasks related to disposal operations. Guidelines for the following elements have been developed:

- Environmental;
- Waste Acceptance;
- Health and Safety & Emergency Response;
- Radiation;
- Packaging; and
- Transport.

b) *Operation Procedure*: When a disposal operation is planned the operation procedure templates are completed so that they address the waste types and operation. Once completed and approved the procedure templates become the operation procedures associated with that disposal operation.

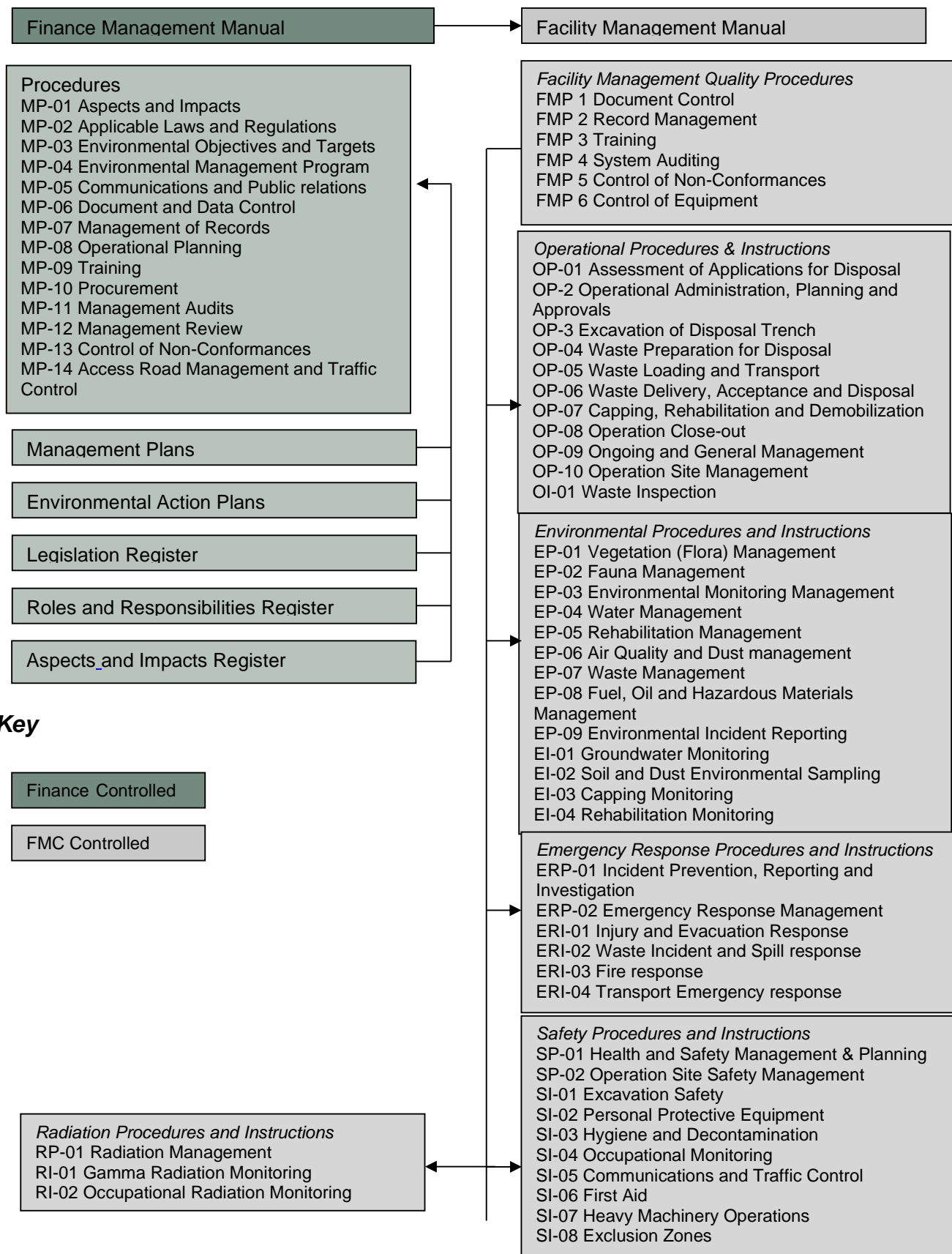
c) *Procedures*: Each procedure defines the purpose, scope and methodology of a set of systematic and related tasks and details the "who, what, where, when, how and why" of those tasks to allow any employee to undertake the tasks in the manner which Finance requires.

While each procedure is related to a specific activity or group of related activities, they are generally classified into six major groups:

- Management Procedures;
- Operational Procedures;
- Environmental Procedures;
- Health and Safety Procedures;
- Emergency Response Procedures; and
- Radiation Procedures.

The Management Procedures relate predominately to activities which are undertaken by Finance; however, the FMC also has Management Procedures. All other procedure types relate to tasks completed by the FMC. A list of all procedures and who is responsible for their management is detailed in Figure 2.

FIGURE 2 IWDF PROCEDURE STRUCTURE



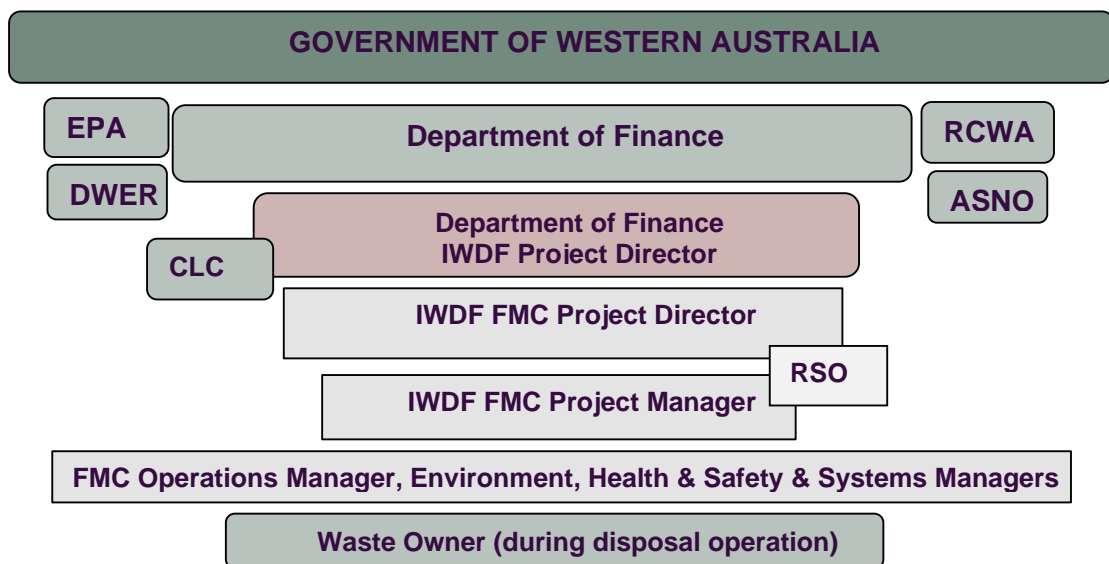
5.5 Performance and Compliance Report

This is an **annual** report prepared by Finance for submission to the relevant regulatory bodies such as the Environmental Protection Authority, the Department of Water and Environmental Regulation and the RCWA.

The Performance & Compliance Report (PCR) summarises the compliance of the operation of the Intractable Waste Disposal Facility (IWDF), Mt Walton East, against Ministerial Statement No. 562, permits, registrations, licences and associated management plans and other system requirements for the reporting period.

Governance of the IWDF is illustrated in Figure 3.

FIGURE 3 IWDF GOVERNANCE STRUCTURE



- EPA - Environmental Protection Authority (Western Australia)
- DWER – Department of Water and Environmental regulation
- RCWA – Radiological Council of Western Australia
- ASNO – Australian Safeguards and Non-proliferation Office
- CLC – Community Liaison Committee
- FMC – Facility Management Contractor
- RSO – Radiation Safety Officer

FACILITY MANAGEMENT CONTRACTOR IWDF SYSTEM MANUAL INTRACTABLE WASTE DISPOSAL FACILITY

This Manual represents the Organisational Structure and Procedures adopted by the Facility Management Contractor (FMC) for the operation and management of the Intractable Waste Disposal Facility (IWDF), Mount Walton East, on behalf of the Department of Finance.

Unless otherwise agreed, this Manual remains the property of the Department of Finance.

The Manual is intended to provide an overview of organisation structure and the structure of the FMC Management System. This Manual should be read in conjunction with the relevant procedures and with the Department of Finance System Manual.

Rev	Date	Description	Prepared by:	Checked by:	Approved by:
0C	6/08/01	Draft	LMC	DFP, MJS	
1	10/01/08	Revision 1	LM	MS	MJS
2	29/05/08	Revision 2	LM	GB	MJS
3	02/04/09	Revision 3	LM	RH	
4	12/05/10	Review only	LM	MJS	MJS
5	14/09/11	Review and change of Proponent name	LM	MJS	MJS
6	3/09/12	Review & update FMC	LM	MJS	MJS
7	12/08/13	Review & update Figure 1 & TOC	LM	MJS	MJS
8	11/09/14	Correction Fig 2, & update Fig 1	LM	MJS	MJS
9	26/09/15	Update to Fig 1a & 1b	LM	MJS	LM
10	22/10/16	Review – no changes	LM	MJS	LM
11	04/10/17	Review – no change	LM	MJS	LM
12	21/11/18	Update to personnel chart, reformat, renaming of BMW manual	LM	MJS	LM
13	19/11/19	Rebranding, Update to personnel chart	LM	MJS	LM
14	24/02/21	BMW changed to Finance, FMC PM changed to Mark Shepherd	LM	MJS	LM

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FACILITY MANAGEMENT CONTRACTOR IWDF PROCEDURES MANUAL

1. INTRODUCTION

1.1 BACKGROUND

The Department of Finance (Finance) is responsible for carrying out waste management operations at the Intractable Waste Disposal Facility (IWDF), Mt Walton East. A Facility Management Contractor (FMC) is engaged by Finance to undertake operational management of the IWDF, including management of sub-contractors, on behalf of Finance.

1.2 ENVIRONMENTAL HEALTH AND SAFETY MANAGEMENT SYSTEM

The IWDF Environmental, Health & Safety and Quality Management System (EHSQMS) is a management system designed to identify areas of actual or potential environmental and health & safety risks resulting from activities at the IWDF and formulate procedures and objectives which minimise or eliminate these risks. The EHSQMS strives to integrate environmental management into the IWDF's daily management, long term planning and other management systems, and ensure Finance maintains a high level of environmental performance.

The structure of the EHSQMS is given in the *Finance System Manual*.

This Manual represents the organisational structure and procedures adopted by the FMC for the operation and management of the IWDF on behalf of Finance. The FMC System Manual is intended to provide an overview of organisation structure and the structure of the FMC IWDF procedures. This Manual should be read in conjunction with the relevant FMC procedures and with the Finance System Manual.

2. ORGANISATION & RESPONSIBILITIES

2.1 FACILITY MANAGEMENT CONTRACTOR STATUS

Aurora Environmental is currently engaged as the FMC for the IWDF.

2.2 RESPONSIBILITIES

The major tasks and responsibilities of the principal positions within the FMC are detailed in the *FMC Functional and Personnel Charts (Figures 1a and 1b)*.

Further details on competencies, authorities and responsibilities of FMC personnel are addressed in the FMC Management Procedure FMP-03 Training & Competency.

Figure 1a Functional Chart

FMC FUNCTIONAL CHART						
			Project Director			
			Project Manager (Principal Contact)	Support Staff Word processing etc.		
Operational Management	Engineering Management	Administration, Systems & Reporting Management	Technical Subcontractors	Health & Safety Management	Environmental Management	Radiation Management
Excavation	Geotechnical design	Environment health & safety & quality management system	Surveyors	Health & Safety Officer / Nurse	Environmental planning	Radiation monitoring
Backfilling	Disposal Cell design	Quality assurance	Chemical analysis	Personnel protective equipment	Environmental monitoring	Radiation safety assessment
Site infrastructure (design & maintenance)	Geotechnology	Hazard evaluation (transport & disposal)	Flora, rehabilitation and fauna assessment		Site Surveys	Radiation safety assessment/ case
Traffic monitoring	Hydrogeology	Disposal approvals	Technical illustration		Environmental approvals	Approvals – radioactive waste
Site security	Geophysics	Disposal reporting			Chemical analyses and interpretation	Packaging / conditioning radioactive waste
Geology	Excavation stability assessment	Performance & compliance reporting			Community reporting & information	Radiation physics & safety
Community liaison	Geotechnical testing – capping	Training			Community liaison	
Hazardous waste management		Admin & financial management, costing & reporting				
<ul style="list-style-type: none"> • Inspection/ waste quality review • Preparation • Packaging • Transport Disposal		Waste inventory / database Operational & system auditing				

Figure 1b FMC Personnel Chart

FMC PERSONNEL CHART						
Project Director Mark Shepherd						
Project Manager Mark Shepherd						
Operations Manager	Engineering Manager	Administration, Systems & Reporting Manager	Technical Subcontractors	Health & Safety Manager	Environment Manager	Radiation Manager
Mark Shepherd	TBA	Leanne Morton	Pinpoint Drafting Colin Reeves	Colin Outhwaite	Greg Milner	Anthony O'Brien
Alternative	Alternative	Alternative	McMullan Nolan Surveyors		Alternative	
Greg Milner Leanne Morton	TBA	Mark Shepherd	Analytical Reference Laboratories	Health & Safety Office/ Nurse TBA	Leanne Morton Mark Shepherd	
			PGV Environmental Paul van der Moezel			
			Support Staff Aurora Environmental			
			Technical Assistant TBA			

3. IWDF PROCEDURES

3.1 STRUCTURE OF THE IWDF PROCEDURES

The Facility Management Contractor IWDF Procedures system comprises the following:

- Manual (this document).
- Procedures Index.
- FMC Management Procedures.
- Operational Procedures and Instructions.
- Environmental Procedures and Instructions.
- Radiation Procedures and Instructions.
- Safety Procedures and Instructions.
- Emergency Response Procedures and Instructions.
- Forms.
- Information Sheets.
- Induction Handbooks.

These procedures and instructions define the purpose, scope and methodology of operational activities and tasks associated with the operational management of the IWDF.

Each **Procedure** defines the who, what, where, when, how and why of operational activities and tasks to allow the tasks and activities to be undertaken in a manner acceptable to Finance and in accordance with the IWDF policy statement.

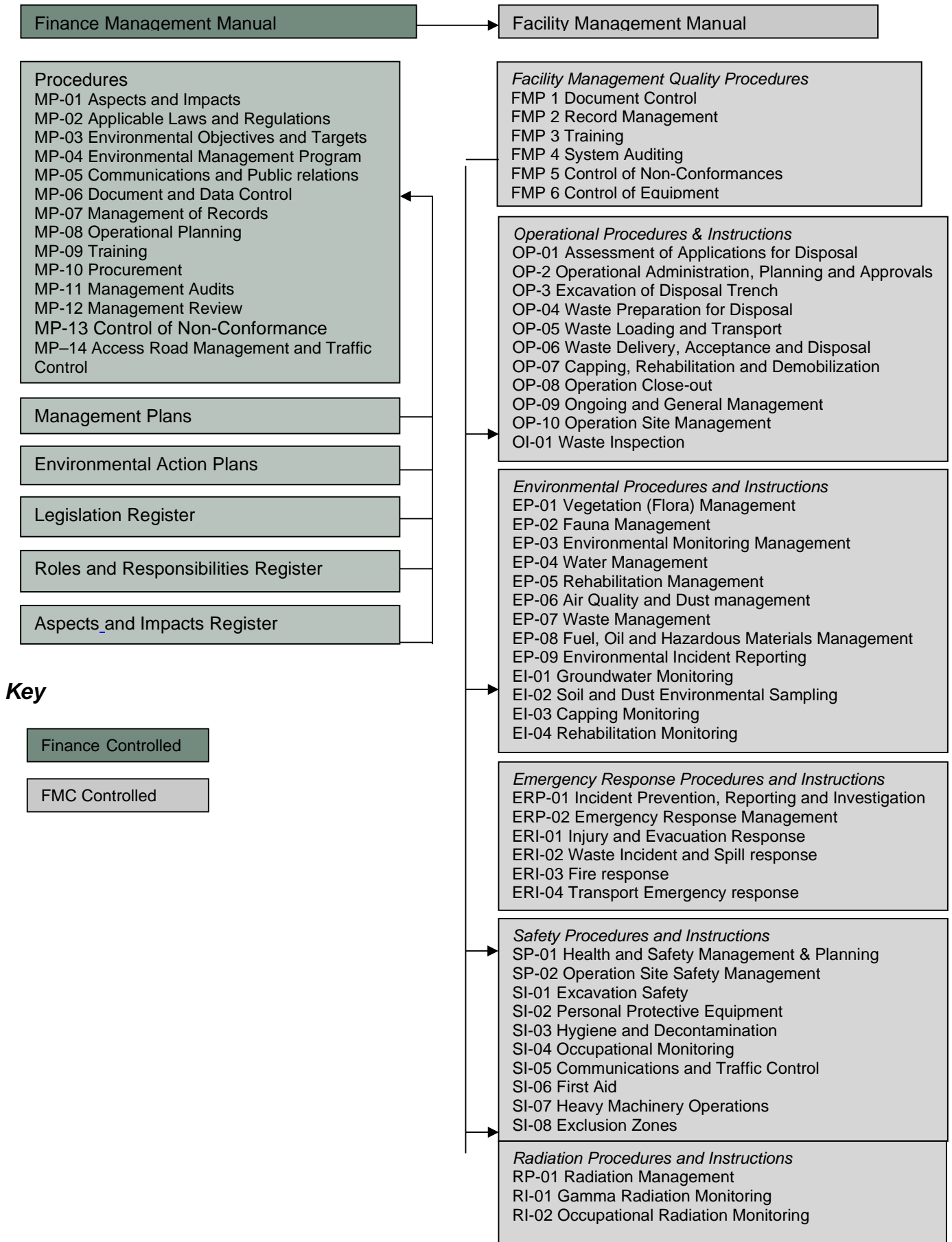
Each **Instruction** provides more specific actions regarding the way in which a particular task should be undertaken.

This system is available electronically.

A flowchart depicting the structure of the procedures and the relationship to the Finance Management Procedures is provided in **Figure 2**.

The context of these procedures in relation to the Finance IWDF Management System is given in Figure 1 of the *Finance System Manual*.

FIGURE 2 IWDF SYSTEMS STRUCTURE



3.2 FINANCE MANAGEMENT PROCEDURES

These procedures define the management of IWDF activities undertaken directly, or coordinated, by Finance, including:

- Identification and Management of Issues (MP-01 Aspects & Impacts, MP-02 Applicable Laws, MP-3 Environmental Objectives & Targets, MP-04 Environmental Management Program);
- System Management (MP-06 Document and Data Control, MP-07 Management of Records, etc.); and
- Operational Management (MP-08 Operational Planning).

These include specification of FMC responsibilities. These specifications have been addressed in the development of the FMC procedures, with reference to applicable Finance Management Procedures, where appropriate.

3.3 FMC MANAGEMENT PROCEDURES

These procedures define the system management of IWDF activities, including document control (FMP-01), record control (FMP-02), training (FMP-03), auditing (FMP-04), control of non-conformances (FMP-05) and equipment control (FMP-06). Many of these procedures are based on requirements specified in similar Finance Management Procedures and, to address these requirements, procedures specific to FMC activities are required. Many of the FMC procedures relate to specific FMC personnel (i.e., other than Finance staff) and the additional physical locations in which FMC activities are carried out.

In cases where Finance procedures exist, but there is no specific FMC Management procedure, the involvement/responsibility of the FMC is either minimal or fully specified in the Finance Management Procedure.

3.4 OPERATIONAL PROCEDURES AND INSTRUCTIONS

These procedures and instructions define operational management of IWDF activities, including specific tasks during the phases of a disposal operation (OP-01 to OP-08 and OP-10) and ongoing management (OP-09). The procedures should act as the first point of reference for operational activities. They refer to more specific environmental, radiation, safety, and emergency response procedures, where further details are required.

The roles, responsibilities and tasks associated with the management of a disposal operation are given in a flowchart presented in Figure 3 – located at end of this manual.

3.5 ENVIRONMENTAL PROCEDURES AND INSTRUCTIONS

These procedures define methods for the effective environmental management of IWDF activities. They address the management of environmental issues identified in the

Environmental Aspects Register and Environmental Management Program for the IWDF (see the Finance System Manual). These procedures provide additional information relevant to the Operational Procedures and are referenced in appropriate Operational Procedures.

3.6 RADIATION PROCEDURES AND INSTRUCTIONS

These procedures define the specific procedures and instructions related to management of radioactive wastes, which are to be disposed at the IWDF. The Radiation Procedure RP-01 Radiation Management addresses the radiation-specific aspects of the operational phases identified in Operational Procedures OP-01 to OP-09.

3.7 SAFETY PROCEDURES AND INSTRUCTIONS

These procedures define the health and safety management of IWDF activities. They address the management of health & safety issues identified in the Health & Safety Management Plan (see the Finance System Manual).

3.8 EMERGENCY PROCEDURES AND INSTRUCTIONS

These procedures define the emergency response management of IWDF activities. They address the management of emergency issues identified in the Emergency Response Management Plan (see the Finance System Manual).

3.9 IWDF FORMS

A series of forms provide proformas for the recording of information and data related to the IWDF activities. These forms are referenced in appropriate procedures and work instructions. They reside in a central location within the electronic system (or in some cases are appended to the procedures themselves).

3.10 INFORMATION SHEETS

A series of sheets provide reference information for key IWDF activities, such as emergency response (e.g., fire, waste spill, injury) and site rules. These sheets are referenced in appropriate procedures and work instructions. They reside in a central location within the electronic system. The sheets can be used as posters at strategic site locations and are also included in induction handbooks.

3.11 INDUCTION HANDBOOKS

A series of proformas have been developed for the presentation of procedures and safety information related to IWDF activities and as personal reference information. They comprise summaries of key operational procedures (e.g., decontamination) and utilise existing Information Sheets, where available. They reside in a central location within the electronic system.

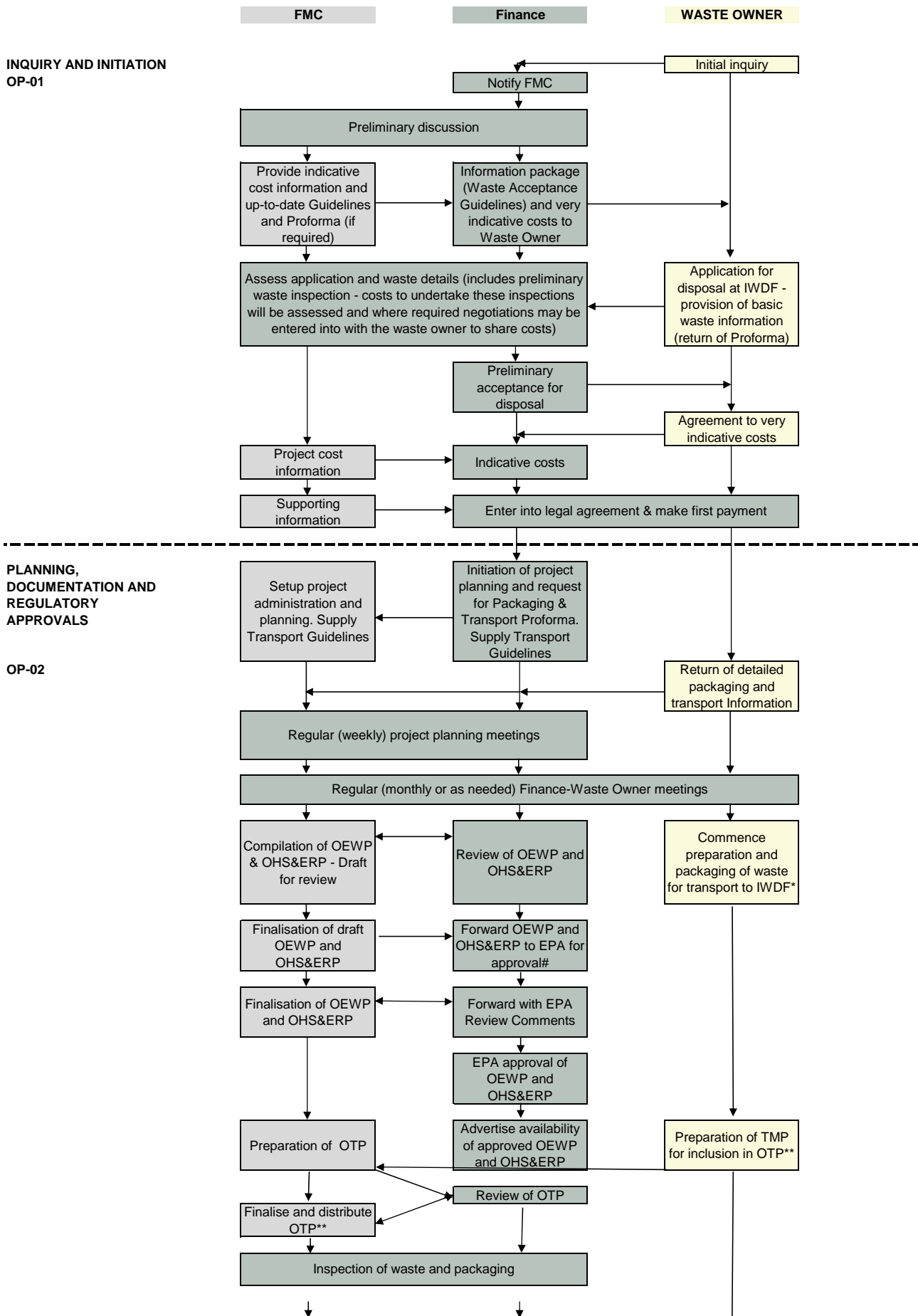
3.12 OPERATION PROCEDURES

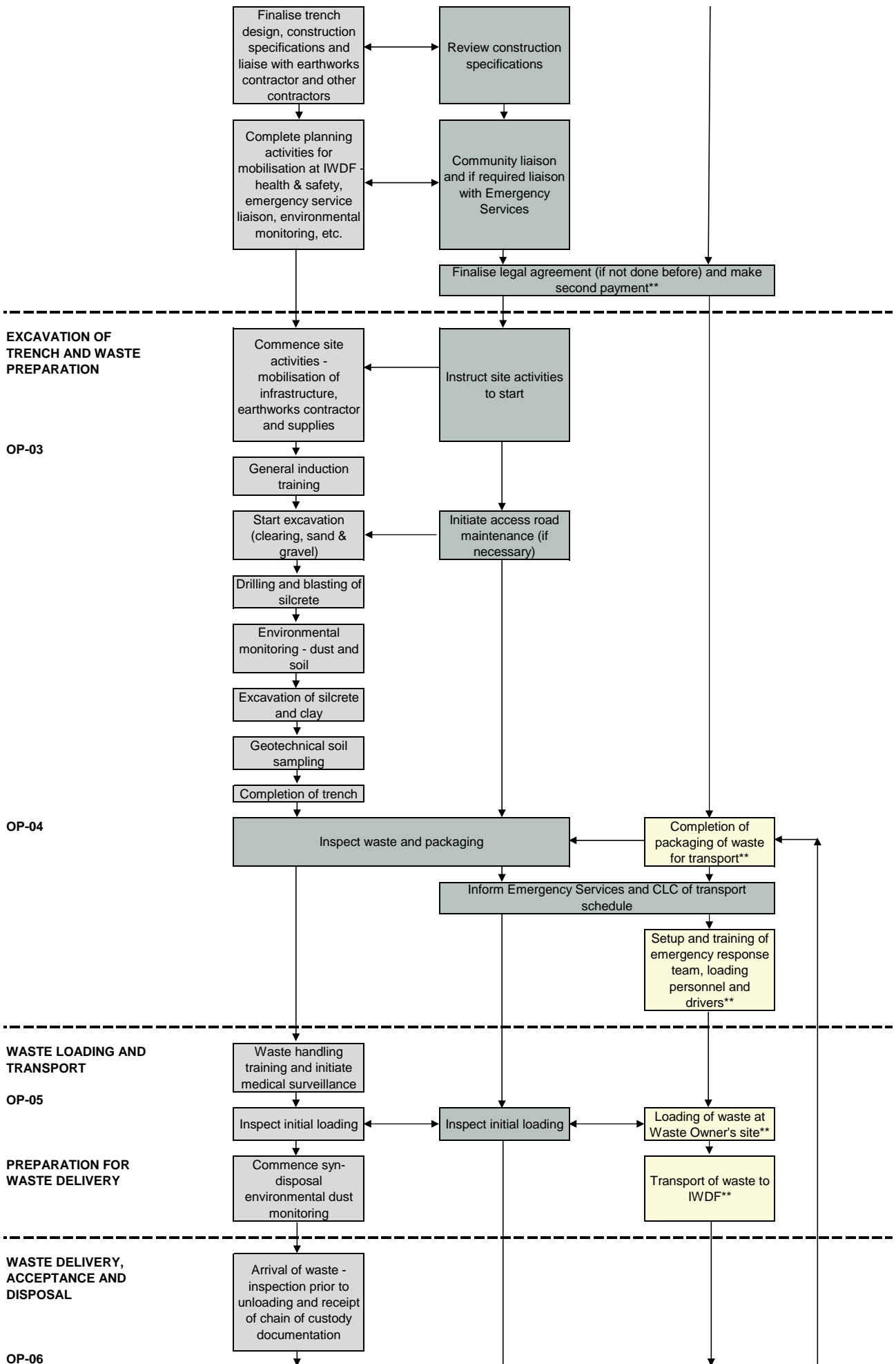
In addition to IWDF procedures, Operation Procedures must be referred to during disposal operations (e.g., Operation Environmental Procedures). These documents are generated on an operation-by-operation basis following applicable guidelines (see the Finance System Manual) and include reference to waste-specific quantities, hazards, and controls. These are referred to in the appropriate IWDF procedures and instructions.

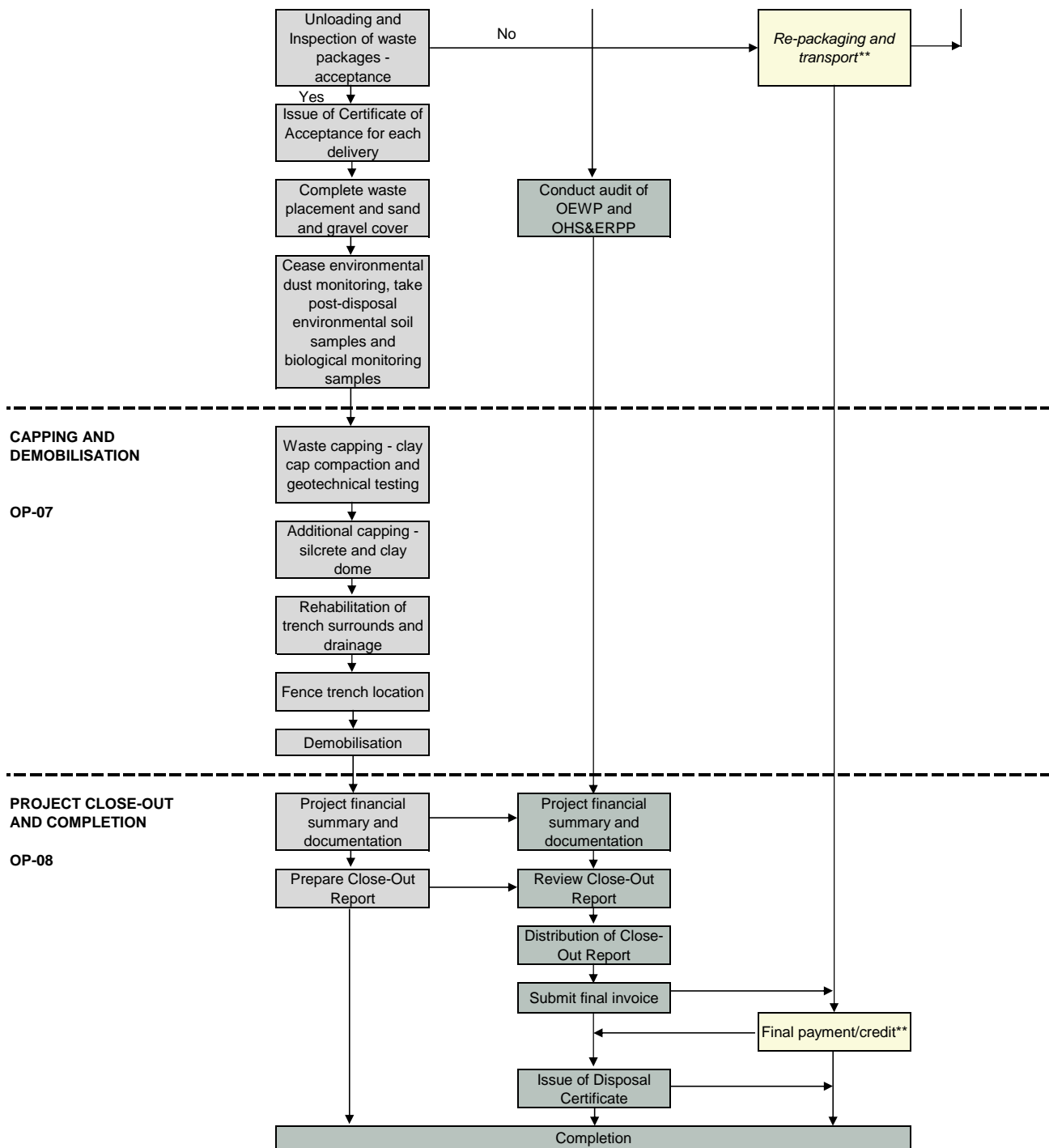
Intractable Waste Disposal Facility - Mt Walton East

Waste Disposal Operation

Typical Sequence of Activities







Notes:

- * Packaging can be undertaken by Finance for small consignments of radioactive wastes
 - ** Transport of small consignments of chemical waste may be undertaken by Finance with a one-off payment to be completed subsequent to packaging, but prior to transport
 - # Approval from the Radiological Council is required if radioactive waste
- Finance Department of Finance
- CLC Community Liaison Committee for the Intractable Waste Disposal Facility, Mt Walton East
- EPA Environmental Protection Authority
- FMC Facility Management Contractor
- OWEP Operation Environmental and Waste Acceptance Procedures
- OTP Operation Transport Procedures
- OHS&ERP Operation Health & Safety and Emergency Response Procedures

APPENDIX P

2020 - 2021 Aspects and Impacts Register



ASPECTS AND IMPACTS REGISTER – IWDF MT WALTON EAST

DEFINITIONS:

Aspect - an element of the IWDF's operations or activities, which may influence the environment, health, and safety of personnel at the site, or the community.

Impact - any change to the environment, health and safety of site personnel or the public, whether adverse or beneficial, resulting from the IWDF's operations or activities.

Frequent - a desired or necessary activity, which occurs under normal operating conditions, most of the time (e.g., dust monitoring, capping of the trench and unloading of the waste)

Infrequent - a desired or necessary activity, which occurs under normal operating conditions, but not very often (e.g., equipment maintenance/repair)

Emergency- an unplanned, undesirable activity or event (e.g., spill, accident, leak)

Risk - a probability or threat of damage, injury, liability, loss, or any other negative occurrence that is caused by external or internal vulnerabilities, and that may be avoided through pre-emptive action. Determination of risk is based on the product of likelihood and consequence.

Likelihood, consequence and risk ratings are summarised as follows:

LIKELIHOOD (should the proposed controls not be in place)

Likelihood

- 1 Rare (>5-10 years)
- 2 Infrequent (e.g., Yearly)
- 3 Occasional
- 4 Frequent (e.g., Weekly)
- 5 Continual (e.g., Daily)

CONSEQUENCE

<i>Consequence</i>	<i>Descriptor</i>	<i>Environmental</i>	<i>Socio-political</i>	<i>Legal Compliance</i>	<i>Health and Safety</i>
1	Insignificant	Minimal impact on the environment	Little or no community/media interest	Unlikely to be of interest to regulators	No injuries, or loss and damage of property
2	Minor	Short term impact only, to a limited area	Minor local community interest. Perhaps special interest group attention	Requires routine incident report to regulators	Requires first aid treatment
3	Severe	Medium term impact or large area of impact	Rising community concern and local action, media interest	Breach of license or legal infringement, fines possible, non-approval of disposal operation	Requires medical treatment
4	Major	Extensive and significant impact on the environment	High community concern, broad media interest, loss of community confidence and state action	Regulators involved in incident response, high level discussions, large fine, non -approval of disposal operation.	Results in extensive human exposure or injury
5	Catastrophic	Extensive, significant impact with long term effect on the environment	Public outcry, national action, ongoing national/international media interest	Possible court action resulting in huge fines or jail	Results in death

RISK MATRIX

<i>Likelihood</i>	<i>Consequence</i>				
	1	2	3	4	5
5	Significant risk	Significant risk	High risk	High risk	High risk
4	Medium risk	Significant risk	Significant risk	High risk	High risk
3	Low risk	Medium risk	Significant risk	High risk	High risk
2	Low risk	Low risk	Medium risk	Significant risk	High risk
1	Low risk	Low risk	Medium risk	Significant risk	Significant risk

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
Assessment and preparation of waste	Assessment of waste proforma	Disposal of substance which could be recycled, reduced, or re-used. Disposal of waste not generated in WA.	Not best practice Breach of Ministerial Conditions	Emergency	1	1	3	4	1	low	medium	significant	low	Completion of Waste Acceptance Proforma Appropriate review of completed waste acceptance proforma Liaison with waste owners EPA approval of Operation Environmental Waste Acceptance Procedures	MP-08, OP-01
	Solidification of liquid waste	Incomplete solidification	Breach of waste owner agreement	Emergency	1	1	1	3	1	low	low	medium	low	Waste Inspections Ongoing liaison with waste owners Packaging and Transport Guidelines	OP-04, OI-01
			Breach of license and Ministerial Conditions	Emergency	1	1	2	3	1	low	low	medium	low		
			Loss of public confidence	Emergency	1	1	3	2	1	low	medium	low	low		
	Storage of wastes at waste owner premise prior to disposal	Spills	Soil contamination	Emergency	2	3	2	3	1	medium	low	medium	low	Waste Inspections	OP-04, OI-01
			Storm water contamination	Emergency	1	4	3	3	1	significant	medium	medium	low		
			Groundwater contamination	Emergency	1	4	3	4	2	significant	medium	significant	low		
			Air impact	Emergency	2	2	3	3	2	low	medium	medium	low		
			Disturb local flora and fauna	Emergency	1	3	2	3	1	medium	low	medium	low		
	Packaging	Packaging failure or accident resulting in spill	Soil contamination	Emergency	2	3	3	4	1	medium	medium	significant	low	Packaging inspections Packaging Proforma PPE	OP-04, OI-01 OP-05, ERI-04
			Storm water contamination	Emergency	2	3	3	4	1	medium	medium	significant	low		
			Groundwater contamination	Emergency	1	3	3	4	1	medium	medium	significant	low		
			Disturb local flora and fauna	Emergency	2	3	2	3	1	medium	low	medium	low		
			Exposure effects to humans	Emergency	3	1	3	3	4	low	significant	significant	significant		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure		
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety				
		Due to human error a higher activity drum packaged for disposal	Potential inhalation dose to worker	Emergency	1	1	3	3	4	Low	Medium	medium	significant	Packaging supervision by RSO & packaging inspections	OI-01 OP-06		
Transport of waste	Handling of waste (unloading and loading)	Spills Due to human error a higher activity drum packaged for disposal	Soil contamination	Infrequent	1	3	3	4	1	medium	medium	significant	low	Operation Transport guidelines OTP OHSERP guidelines Waste specific training Inspection of waste Use of PPE	OP-05, ERI-04, EP-08		
			Storm water contamination	Infrequent	1	3	3	4	1	medium	medium	significant	low				
			Groundwater contamination	Infrequent	1	3	3	4	1	medium	medium	significant	low				
			Disturb local flora and fauna	Infrequent	1	2	3	3	1	medium	significant	significant	low				
			Exposure effects to humans	Infrequent	1	1	3	3	4	Low	Medium	Medium	significant				
	Transport on site	Truck fumes	Air Impact	Soil contamination	Infrequent	5	1	1	1	1	significant	significant	significant	significant	Operation transport guidelines OTP Decontamination and containment equipment	OP-05 ERI-04 EP-08	
				Fuel Leaking	Soil contamination	Infrequent	3	2	2	2	1	medium	medium	medium			Low
				Storm water contamination	Infrequent	3	3	2	2	1	significant	medium	medium	low			
				Groundwater contamination	Infrequent	1	3	2	2	1	medium	low	low	low			
	Transport off site	Truck fumes	Air impact	Soil contamination	Frequent	5	1	1	1	1	significant	significant	significant	significant	Transport operation guidelines OTP Decontamination and containment equipment	OP-05 ERI-04 ERI-03	
				Fuel leaking	Soil contamination	Infrequent	3	2	3	2	1	Medium	significant	medium			Low
				Storm water contamination	Infrequent	3	3	3	2	1	significant	significant	medium	Low			
				Groundwater contamination	Infrequent	2	3	3	2	1	Medium	medium	Medium	Low			
Accident	Fire	Air Impact	Damage to flora and fauna	Emergency	3	3	3	3	1	significant	significant	significant	low	Use of PPE OHSERP Waste specific training Correct equipment present.	ERP-01 ERP-02 ERI-04 OP-05 ERI-05		
			Spills	Soil contamination	Emergency	3	4	3	3	1	High	significant	significant			low	
	Storm water contamination	Emergency	3	4	3	3	1	High	significant	significant	low						
		Emergency	3	4	3	3	1	High	significant	significant	low						

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure	
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety			
			Groundwater contamination	Emergency	2	4	3	3	1	significant	Medium	Medium	low	Vehicles available	ERI-04 ERP-2 ERP-01 OP-05	
			Disturb local flora and fauna	Emergency	3	3	2	3	1	significant	medium	significant	low			
			Human exposure	Emergency	2	1	3	4	4	low	medium	significant	significant			
	Emergency vehicles accompanying trucks carrying intractable wastes	Reduce impact of accident or emergency		Frequent	5	1	1	1	1	significant	significant	significant	significant			
			Increase impact of accident or emergency if not suitably equipped, trained or experienced	Soil contamination	Emergency	1	4	3	3	3	significant	medium	medium			medium
				Storm water contamination	Emergency	1	4	3	3	3	significant	medium	medium			medium
				Groundwater contamination	Emergency	1	4	3	3	3	significant	medium	medium			medium
	Disturb local flora and fauna	Emergency		1	4	3	3	3	significant	medium	medium	medium				
Training	Personnel not properly trained	Soil contamination	Infrequent	3	4	2	3	1	high	medium	significant	low	Waste specific training Site induction OHSERP guidelines	OP-05, FMP-03, MP-09		
		Storm water contamination	Infrequent	3	4	2	3	1	high	medium	significant	low				
		Groundwater contamination	Infrequent	2	4	2	3	1	significant	low	medium	low				
		Disturb local flora and fauna	Infrequent	3	3	2	3	1	significant	medium	significant	low				
		Human injury	Infrequent	2	1	2	2	3	low	low	low	medium				
Disposal at IWDF	Trench Construction	Construction impacts	Dust	Infrequent	3	1	1	1	1	Low	Low	low	Low	Records of excavation stability Removed vegetation stockpiled for rehabilitation Dust suppression techniques Stability of trench regularly checked by geologist or geotechnical engineer	OP-03,	
			Noise-excessive	Infrequent	2	1	1	1	1	Low	low	Low	Low			
		Process failure	Dust	Infrequent	1	1	1	1	1	Low	Low	low	Low			
			Noise-excessive	Infrequent	1	1	1	1	1	Low	low	Low	Low			
			Erosion	Infrequent	1	3	2	2	1	medium	low	low	low			

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
	Operation of drill rig	Overhead hazard/falling objects	Frequent	4	1	1	2	3	medium	medium	significant	significant	Regular safety checks to ensure machinery is safe Dust minimization techniques Training Firefighting equipment Vegetation checked to ensure it is not priority species	ERI-03 SI-07 OP-03 ERP-01	
		Noise	Frequent	5	1	1	1	1	significant	significant	significant	significant			
		Fire and explosion	Frequent	1	3	3	3	3	medium	medium	medium	Medium			
		Dust	Frequent	4	1	1	1	1	medium	medium	medium	Medium			
		Clearing vegetation	Frequent	4	3	2	1	1	significant	significant	medium	medium			
	Personnel not trained	Soil contamination	Infrequent	2	3	2	3	1	medium	low	medium	Low	Induction training FMC to ensure contractors are qualified for job Waste specific training	MP-08 FMP-03 OP-03	
		Storm water contamination	Infrequent	2	3	2	3	1	Medium	low	Medium	Low			
		Groundwater contamination	Infrequent	1	3	2	3	1	Medium	Low	low	Low			
		Disturb local flora and fauna	Infrequent	3	2	1	2	1	Medium	low	Medium	Low			
		Noncompliance with ISO 14001	Infrequent	3	1	2	2	1	Low	Medium	medium	low			
	Clearance of vegetation	Loss of species	Infrequent	4	3	2	3	1	significant	significant	significant	medium	Removed topsoil and vegetation stockpiled Priority species identified and clearing in that area avoided	EP-01 EI-04 EP-05	
	Operation of large excavators and other heavy machinery	Asphyxiation from fumes when working in closed area	Frequent	4	1	2	2	3	medium	significant	significant	significant	Regular safety checks of machinery Use of PPE Personnel appropriately qualified for the job Appropriate windrow / operational bunding construction around trench	SI-07 SI-05 SP-01 SI-01	
		Noise	Frequent	5	2	1	1	1	significant	significant	significant	significant			
		Vehicle accidently falling into trench from surrounding surface area	Infrequent	4	1	2	2	3	Medium	significant	significant	significant			
	Use of explosives to	Fire	Frequent	2	3	2	2	1	Medium	low	low	Low	Use of PPE	ERI-03 ERP-01	

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
		blast silcrete	Explosion	Frequent	2	3	2	3	3	Medium	low	medium	Medium	Safety Manager present	SP-02 SI-01
			Falling debris	Frequent	2	1	2	2	3	Low	low	low	medium	Personnel qualified for the job	
			Dust	Frequent	2	1	1	1	1	Low	low	low	low	Firefighting equipment and first aid officer on site	
		Excavation stability	Falling debris/cave-in	Frequent	2	2	2	2	3	Low	low	low	medium	Use of PPE Trench regularly inspected for stability by geologist / geotechnical engineer	OP-03 SI-01
			Falling loads	Frequent	2	2	2	3	3	low	low	low	medium		
			Confined spaces-hazardous atmospheres	Frequent	1	1	1	2	2	low	low	low	Low		
			Limited access in an emergency	Frequent	2	1	1	1	3	low	low	low	medium		
	Unloading and waste placement	Accidents such as dropped load, puncturing a drum resulting in spillage of hazardous material or release of radioactivity	Soil contamination	Emergency	2	4	3	3	1	significant	medium	medium	low	Use of PPE Use forklift to unload waste where possible Waste specific training Liaison with earthworks contractors prior to unloading to determine the method of unloading	OP-06 ERP-01 ERP-02 ERI-02
			Storm water contamination	Emergency	2	4	3	3	1	significant	medium	medium	Low		
			Groundwater contamination	Emergency	1	4	3	3	1	significant	medium	medium	Low		
Dust nuisance			Infrequent	3	1	1	1	4	low	low	low	high			
Potential inhalation dose to worker				2	1	2	2	4	significant	low	low	high			
Vehicle fire resulting in damage to drum and release of radioactivity		Potential inhalation dose to worker		2	1	2	2	4	significant	low	low	high	Training in appropriate Emergency response related to fire	FMP-06 ERI-03 ERI-04	
Personnel not trained properly		Personnel		2	4	2	3	3	significant	low	medium	significant	Waste specific training Site Induction FMC ensure contractors are qualified for their job	MP-09 FMP-03	
Movement impacts		Dust nuisance	Infrequent	2	1	1	1	1	low	low	low	low	Use of PPE	EP-06 EP-02	
	Noise-excessive	Infrequent	2	1	1	1	1	low	low	low	low	Dust suppression techniques	OP-06		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure		
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety				
		Operation of heavy machinery	Noise	Frequent	5	1	1	1	1	significant	significant	significant	significant	Regular safety checks of machinery Site safety manager present First aid officer present Dust suppression techniques used	OP-06 EP-06 SI-07		
			Dust	Frequent	5	1	1	1	1	significant	significant	significant	significant				
			Road safety-accident resulting in injury	Emergency	2	1	2	2	3	low	low	low	medium				
		Failure to comply with legislation and other statutory requirements	Non-conformance	Infrequent	3	1	2	3	1	low	medium	significant	low			Audits to ensure compliance with legislation	MP-02 MP-13 FMP-05
			Environment	Infrequent	3	5	4	4	1	high	high	high	low				
			Prosecution	Infrequent	2	1	4	4	1	low	significant	significant	low				
		Excavation stability	Falling debris/cave in	Frequent	2	2	1	2	2	low	low	low	Low			Trench stability checked regular by geologist/ geotechnical engineer	SI-01 OP-06 SP-02
			Falling loads	Frequent	2	3	2	2	3	medium	Low	low	medium				
			Confined space-hazardous atmospheres	Frequent	1	1	1	2	2	low	low	low	low			Use of PPE Correct equipment	
	Limited access in emergencies		Frequent	2	1	1	1	3	low	low	low	medium	First aid officer on site				
	Backfilling and capping of trench	Operation of large excavators and other heavy machinery	Noise	Frequent	5	1	1	1	1	significant	significant	significant		significant	Regular safety checks on machinery Dust suppression techniques Appropriate windrow / operational bunding construction around trench First aid equipment / personnel on site	SI-01 OP-07	
			Dust	Frequent	5	1	1	1	1	significant	significant	significant	significant				
			Vehicle accidentally falling into trench from surrounding surface area	Infrequent	4	1	2	2	3	Medium	significant	significant	significant				
			Road safety-accident resulting in injury	Frequent	2	1	2	2	3	low	low	low	medium				
		Backfilling impacts	Dust nuisance	Infrequent	3	1	1	1	1	low	low	low	low	Dust suppression techniques PPE	EP-06 OP-07		
Noise-excessive			Infrequent	2	1	1	1	1	low	low	low	low					
Failure to comply with legislation and other statutory requirements		Non-conformance	Infrequent	3	4	3	3	3	high	significant	significant	significant	Audits to ensure compliance with legislation	MP-02 FMP-5 MP-13			
		Environment	Infrequent	3	4	3	3	1	high	significant	significant	low					
		Prosecution	Infrequent	2	4	3	3	1	significant	medium	medium	low					

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure		
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety				
		Personnel not properly trained	Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low	FMC ensure contractors are qualified to do job Site induction Waste specific training	MP-09 FMP-3 OP-07		
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low				
			Groundwater contamination	Infrequent	1	4	3	3	1	significant	medium	medium	low				
			Disturb local flora and fauna	Infrequent	3	3	2	3	1	significant	medium	significant	low				
		Poor construction	Soil contamination	Emergency	2	4	3	3	1	significant	medium	medium	low	Sufficient geotechnical testing Capping record	OP-07 SP-02		
			Erosion of cover	Infrequent	3	4	2	3	1	high	medium	significant	low				
		Backfilling incomplete or inadequate	Dust nuisance	Infrequent	3	1	1	1	1	low	low	low	low				
			Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low				
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low				
				Dust nuisance	Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low		
					Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low		
Dust nuisance	Infrequent				2	1	1	1	1	low	low	low	low				
	Community Input	Failure to get feedback	Public outcry	Infrequent	3	1	2	2	1	low	medium	medium	low	CLC meetings	MP-8		
Contingency and Emergency response	Emergency vehicles	General	Noise excessive	Frequent	5	1	1	1	1	significant	significant	significant	significant	Emergency vehicles on standby	ERP-01 ERP-02 EP-08		
			Truck fumes	Air impact	Frequent	5	1	1	1	1	significant	significant	significant			significant	
		Leaks (fuel, oil) or breakdown	Soil contamination	Infrequent	3	2	2	2	1	medium	medium	medium	low	Emergency vehicles informed of location and nature of waste			
			Storm water contamination	Infrequent	3	2	2	2	1	medium	medium	medium	low				
			Groundwater contamination	Infrequent	2	2	2	2	1	low	low	Low	low				
			Disturb local flora and fauna	Infrequent	2	2	2	2	1	low	low	low	low				
		Inadequately supplied	Soil contamination	Infrequent	3	4	3	3	1	high	significant	significant	low				
			Storm water contamination	Infrequent	3	5	3	3	1	high	significant	significant	low				
			Groundwater contamination	Infrequent	2	5	3	3	1	high	medium	medium	Low				

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Disturb local flora and fauna	Infrequent	2	5	3	3	1	high	medium	medium	Low		
	Presence of emergency response team	Poor response to emergency	Soil contamination	Emergency	3	4	3	3	1	high	significant	significant	low	Health and Safety and Emergency Response operation procedures established and on standby	ERP-01 ERP-02 ERI-01 ERI-02 ERI-03 ERI-04
Storm water contamination			Emergency	3	4	3	3	1	high	significant	significant	low			
Groundwater contamination			Emergency	2	4	3	3	1	significant	medium	medium	low			
Disturb local flora and fauna			Emergency	3	4	3	3	1	high	significant	significant	low			
Air impact			Emergency	3	1	1	1	1	low	low	low	low			
	Training	Poor response to emergency	Soil contamination	Emergency	3	4	3	3	1	high	significant	significant	low	General site induction	ERI-04 ERI-03 ERI-02 ERI-01
Storm water contamination			Emergency	3	4	3	3	1	high	significant	significant	Low	Waste specific training		
Groundwater contamination			Emergency	2	4	3	3	1	significant	medium	medium	low	First aid officer and equipment on site		
Disturb local flora and fauna			Emergency	3	4	3	3	1	High	significant	significant	low			
Air impact			Emergency	3	1	1	1	1	low	low	low	low			
	Emergency equipment	Lack of appropriate equipment	Soil contamination	Emergency	2	3	2	3	1	medium	low	medium	low	Site equipment checked regularly Appropriate equipment is on site	ERP-01 ERP-02
Storm water contamination			Emergency	2	3	2	3	1	medium	Low	medium	low			
Groundwater contamination			Emergency	2	3	2	3	1	medium	Low	medium	low			
Disturb local flora and fauna			Emergency	2	3	2	3	1	Medium	Low	medium	low			
Air Impact			Emergency	2	3	2	3	1	medium	Low	medium	low			
Injured personnel do not get appropriate treatment			Emergency	2	1	2	2	4	low	Low	low	significant			
	Emergency facilities	Unaware of location of emergency facilities	Delay in receiving treatment	Emergency	2	1	2	2	4	low	low	low	significant	Emergency numbers readily available on site	ERP-01 ERP-02

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
		Emergency facilities unaware of exposure symptoms	Delay in receiving treatment	Emergency	1	1	3	4	5	low	medium	significant	high	Emergency facilities informed of the nature of injuries expected at the site. Police and medical representative on the CLC	FMP-03, MP-09 EP-03 EI-01, EI-02, EI-03, EI-04 RI-1, RI-2
Monitoring	Training	Personnel properly trained	Minimize environmental harm	Frequent	5	1	1	1	1	significant	significant	significant	significant	Monitoring work instructions Equipment regularly tested Monitoring record Personnel trained	EP-03
		Personnel not properly trained	Soil contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low		
			Storm water contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low		
			Groundwater contamination	Infrequent	1	4	3	3	1	High	significant	significant	low		
	Airborne contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low				
	Management	Monitoring equipment not working	Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Low	Monitoring equipment checked	EP-03
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Low		
			Groundwater contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Low		
			Airborne contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Medium		
	Absence of regular monitoring periods	Soil contamination	Infrequent	3	4	3	3	1	High	significant	significant	low	Monitoring record	EI-01 EI-02 EI-03 EI-04 RI-01 RI-02	
		Storm water contamination	Infrequent	3	4	3	3	1	High	significant	significant	low	Monitoring log		
		Groundwater contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low			
		Airborne contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low			
	Community input/feedback	Failure to develop a relationship	Public outcry if they don't know results activities	Infrequent	3	1	3	3	1	Low	significant	significant	low	CLC meetings	
Records and Documentation	Consistent and up to date records	Not maintained resulting in system failures	Poor communication	Infrequent	3	4	3	3	3	High	significant	significant	significant	System audits	MP-07 MP-06 FMP-02 FMP-01
			Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Low	Management Review Meetings	

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	Medium	Low		
			Groundwater contamination	Infrequent	1	4	3	3	1	significant	medium	Medium	Low		
			Disturb local flora and fauna	Infrequent	2	3	3	3	1	Medium	medium	Medium	Low		
			Noise-excessive	Infrequent	4	1	1	1	1	medium	medium	medium	medium		
			Dust	Infrequent	2	1	1	1	1	low	low	Low	low		
			Air impact	Infrequent	2	5	1	1	1	high	low	low	low		
			Public criticism	Infrequent	3	4	3	3	1	high	significant	significant	low		
	Record management and control	Records lost or destroyed	Public criticism	Infrequent	5	1	2	2	1	significant	significant	significant	significant	Management procedures	MP-07 FMP-02
		Not in compliance	Infrequent	5	1	2	2	1	significant	significant	significant	significant			
Auditing and Reviewing	Waste specification audit	Non-conformance	Non-conformances	Infrequent	3	4	2	3	3	high	medium	significant	significant	Audits undertaken	MP-11 FMP-11 MP-13 FMP-5
	Training	Non-compliance	Soil contamination	Infrequent	3	4	3	3	1	high	significant	significant	low	Corrective Action Request form	
			Storm water contamination	Infrequent	3	4	3	3	1	high	significant	significant	low		
			Groundwater contamination	Infrequent	3	4	3	3	1	high	significant	significant	low		
			Airborne contamination	Infrequent	3	4	3	3	1	high	significant	significant	low		
	Documentation of waste	Non-compliance	Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low	Assessment of waste form Clear documentation of waste acceptance prior to disposal using waste inspection checklists	
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low		
			Groundwater contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low		
			Air impact	Infrequent	2	4	3	3	1	significant	medium	medium	low		
	Transportation	Non-compliance	Soil contamination	Emergency	2	4	3	3	1	significant	medium	medium	low	OTP guidelines	
Storm water contamination			Emergency	2	4	3	3	1	significant	medium	medium	low			

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Groundwater contamination	Emergency	1	4	3	3	1	significant	medium	medium	low		
			Disturb local flora or fauna.	Infrequent	3	4	3	3	1	high	medium	medium	low		
	Compliance audit	Non-compliance	System failure	Infrequent	3	3	2	3	3	significant	medium	significant	significant	Performance and Compliance report	
	Community input and feedback	Failure to get feedback	Public outcry	Infrequent	3	1	2	2	1	low	medium	medium	low	CLC Meeting	Management Plan 10

APPENDIX Q

2020 – 2021 Legal and Other Requirements Register



Register of Legislative and Other Requirements

Finance shall always endeavour to ensure that the IWDF, Mt Walton East operates in compliance with all applicable environmental, regulatory, and legislative requirements.

To effectively manage all legislative requirements a register of the principal State legislation and the principal Commonwealth legislation has been developed. The register shall be maintained and updated regularly in accordance with MP-02 Applicable Laws and Regulations.

Rev	Date	Description	Prepared by:	Checked by:	Approved by:
1	17/09/01	Draft	LCH	LMC	LM
2	4/10/01	Draft	LCH		
3	1/10/07	Draft	LM	MJS	
4	5/03/10	Draft	LM	RH	
5	5/09/11	Draft	LM	RH	
6	11/08/12	Reviewed and updated	LM	RH	RH
7	09/09/13	Reviewed and updated	LM	RH	RH
8	17/06/14	Review & Updated	LM	RH	RH & LM
9	14/04/15	Updated with new ARPANSA docs such as COP for safe transport of Radioactive material	LM	Management Team	MT
10	2/04/16	Updated to reflect changes to Revised Code of Practice for Transport of Dangerous Goods (2015); and Environmental Protection (Controlled Waste) Regulations 2004 (as amended).	LM	MT	MT
11	11/03/17	Updated to include Biodiversity Conservation Act 2016 & SSR-5 & ADG Code 7.5	LM	MT	MT
12	25/06/18	Update to Health Act 1911	LM		
13	19/02/19	Biodiversity Conservation Act 2016 in force as of Jan 2019	LM		
14	12/03/19	Inclusion of Emergency Response legislation	LM		
15	15/11/19	Review in prep for potential disposal	LM	LM	MT
16	21/02/21	Review and update to proponent name	LM	LM	MS



**PRINCIPAL STATE LEGISLATION AND OTHER REQUIREMENTS SUCH AS
GUIDELINES, STANDARDS AND CODES OF PRACTICE**

PDF copies of relevant State legislation can be located at <https://www.legislation.wa.gov.au>
or in the IWDF document library legislation folder

TOPIC	LEGISLATION	RELEVANT PROCEDURE
Environmental Protection	<p><i>Biodiversity Conservation Act 2016</i> Western Australia achieved an environmental milestone when the Biodiversity Conservation Act 2016 (WA) and its Regulations replaced the 1929 Sandalwood Act and the 1950 Wildlife Conservation Act and establish a new regime for the conservation and protection of biodiversity on 1 January 2019.</p> <p>Some of the key changes to be implemented by the Act include:</p> <p>Listing changes: both species and ecological communities (i.e. naturally occurring groups of plants, animals and other organisms interacting in a unique habitat such as Banksia Woodlands) may now be listed. The Minister may now also list habitats as "critical habitats"</p> <p>Fines: the fines for taking threatened flora or taking, possessing or disturbing threatened fauna have significantly increased.</p> <p>Obligation to report - there is an obligation to report an occurrence of threatened species or threatened ecological communities if found during field work.</p>	EP-02, EP-05
	<p><i>Environmental Protection Act 1986</i> An Act to provide for an Environmental Protection Authority, for the prevention, control and abatement of pollution and environmental harm, for the conservation, preservation, protection, enhancement and management of the environment.</p>	All operational and ongoing management environmental procedures
	<p><i>Environmental Protection (Clearing of Native Vegetation) Regulations 2004</i> Defined simply, land clearing is the removal of native vegetation. The <i>Environmental Protection (Clearing of Native Vegetation) Regulations 2004 (WA)</i> defines land clearing as the killing or destruction of, the removal of, severing of trunks or stems of and the doing of any other substantial damage to any vegetation that is native to Western Australia. Fire breaks at IWDF are exempt.</p>	EP-01, OP-03 A clearing permit is not required for clearing the trench area
	<p><i>Environmental Protection (Controlled Waste) Regulations 2004</i> Apply to any wastes that cannot be disposed of at a Class I, II or III landfill site. Controlled wastes also include asbestos, clinical or related waste, tyres and waste that has been immobilised or encapsulated.</p> <p>The DWER regulates the transportation of controlled wastes that may cause environmental or health risks. The Regulations provide for the licensing of carriers, drivers and vehicles involved in the transportation of controlled wastes on public roads.</p>	Transport Guidelines OP-06



	<p>Conservation and Land Management Act 1984 An Act to make better provision for the use, protection and management of certain public lands and waters and the flora and fauna thereof, to establish the Conservation and Parks Commission, to confer functions relating to the conservation, protection and management of biodiversity and biodiversity components, and for incidental or connected purposes.</p>	EP-01, EP-02, EP-05,
	<p>Soil and Land Conservation Act 1945 An Act relating to the conservation of soil and land resources, and to the mitigation of the effects of erosion, salinity and flooding.</p>	EP-01, EP-05
	<p>Bush Fires Act 1954 The Act aims to prevent bush fires by prohibiting or restricting burning periods and outlining permissible activities during the control and extinguishment of bush fires and during bush fire emergencies. The Act allows for prosecution and penalties for non-compliance with the conditions and restrictions of the Act.</p> <p>Text below was extracted from Shire of Coolgardie website</p> <p><i>Under Section 33 of the Bush Fires Act 1954, everyone is required on or before the first day of November or within fourteen days of your becoming an owner or occupier of land should this be after this day to clear all firebreaks and remove flammable materials from the land owned or occupied by you as specified hereunder and to have the specified land and firebreaks clear of all flammable materials from the first day of November up to the thirty first day of March.</i></p> <p><i>1.Land Outside Town Sites</i></p> <p><i>1.1 All buildings on land which is outside town sites shall be surrounded by two firebreaks not less than two (2) metres from the perimeter of the building or group of buildings and the outer firebreak not less than 200 metres from the inner firebreak.</i></p> <p><i>1.2 The removal of flammable material from the whole of the land between the firebreaks required in paragraph 1.1 above.</i></p>	EP-08, SP-02, ERI-03, ERP-02
	<p>Agriculture and Related Resource Protection Act 1976 Weeds The principal legislation is the Agricultural and Related Resources Protection Act 1976 (ARRPA). This Act is administered by the Agriculture Protection Board (APB), which is now incorporated into the Department of Agriculture. Regional Advisory Committees advise the APB on weed and other protection issues within WA and the Board has the authority to declare plants for part or all of the State under five different categories. The State's quarantine responsibilities are handled by the Western Australian Quarantine Inspection Service (WAQIS) operating within the Department of Agriculture.</p> <p>Related legislation is the Plant Diseases Act 1989 (PDA). This Act is concerned primarily with pests and diseases. However, weeds are regarded as a form of plant disease under this Act with provisions allowing for plants to be permitted or excluded for quarantine purposes.</p>	OP-05, OP-06



	<p>The Department of Agriculture has a single list of plants which currently operates under the PDA. This list contains permitted and prohibited plants, with any species not on the list being prohibited unless assessed to be eligible for addition to the list.</p> <p>In addition to declared plants under the ARRPA, there is also provision for a shire council to prescribe any plant, other than a declared plant, as a pest plant within its municipality.</p>	
Waste Management	<p>Waste Avoidance and Resource Recovery Act 2007</p> <p>The primary objective of the WARR Act 2007 is to contribute to sustainability, and to the protection of human health and the environment. It is also designed to help Western Australia to move towards a waste-free society by</p> <ul style="list-style-type: none"> • Promoting the most efficient use of resources, including resource recovery and waste avoidance • Reducing environmental harm, including pollution through waste • Consideration of resource management through avoidance of unnecessary resource consumption and disposal • Resource recovery which includes reuse, reprocessing, recycling and energy recovery <p>The WARR Act 2007 also reflects the principles set out in the Environmental Protection Act 1986 section 4.</p>	Waste Acceptance Guidelines sets out the waste hierarchy - assessment of waste proformas includes consideration of the waste hierarchy
Contaminated Sites	<p>Contaminated Sites Act 2003</p> <p>The Contaminated Sites Act 2003 (Act) provides a regulatory scheme for dealing with sites that are known or suspected to be contaminated. Among other things, the scheme involves reporting, investigating and remediating such sites. A site is considered contaminated if it has a substance present at above background concentrations that presents or has the potential to present risk of harm to human health, the environment, or any environmental value. One feature of the scheme is that an accurate database of WA's contaminated sites is kept by the Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (the DWER). Information for the database is obtained (primarily) from persons who have a statutory duty to report known, or suspected, contaminated sites to the DWER. Additionally, any member of the public who is concerned that a site is, or may be, contaminated may voluntarily lodge a report. Certain contaminants are dealt with under different legislation. For example: for radioactive materials - see the Radiation Safety Act 1975</p>	
Dangerous Goods	<p>Dangerous Goods Safety Act 2004</p> <p>An Act relating to the safe storage, handling and transport of dangerous goods and for related purposes. The Act indicates those activities and substances which require licensing prior to use, storage or transport. The aim of the Act is to reduce or minimise the risk from dangerous goods.</p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p>Dangerous Goods Safety (General) Regulations 2007</p>	OP-04, OP-05, OP-06, OI-01, EP-08



	<p><i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i></p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p><i>Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007</i></p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p>Department of Mines and Petroleum, 2010, Storage and handling of dangerous goods — code of practice (2nd edition): Resources Safety, Department of Mines and Petroleum, Western Australia, 111 pp.</p>	OP-04, OP-05, OP-06, OI-01, EP-08
Emergency Response	<p><i>Emergency Management Act 2005 (WA)</i> The State EM Plan, the State Hazard Plans (Westplans) and the State Support Plans have been prepared by the State Emergency Management Committee (SEMC) under section 18 of the Emergency Management Act 2005 (WA) (the EM Act) and are consistent with the State EM Policy.</p>	ERP-02, Health & Safety and Emergency Response (Reporting) Guidelines
Radioactive Waste & Radiation Safety	<p><i>Radiation Safety Act 1975</i> An Act to regulate the keeping and use of radioactive substances, irradiating apparatus and certain electronic products, and for matters incidental thereto." The Act sets out the powers and responsibilities of the Radiological Council and describes the licensing and registration requirements for persons who deal with any radioactive substances, irradiating apparatus or electronic products. Licences are normally issued for periods of 1-3 years.</p> <p>Department of Finance must appoint a Radiation Safety Officer (RSO), who is to be approved by the Radiological Council. The RSO provides the initial point of contact with the Radiological Council for all radiation matters.</p>	OP-01, OP-02, MP-08, RP-01, RI-01, RI-02
	<p><i>Radiation Safety (General) Regulations 1983</i> Calls up the Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia 1992 (now replaced by new code)</p>	OP-01, OP-02, MP-08, RP-01, RI-01, RI-02
	<p><i>Radiation Safety (Transport of Radioactive Substances) Regulations 2002</i></p> <ul style="list-style-type: none"> • Any person who transports radioactive substances in Western Australia must be licensed or work under the direction and supervision of a licensee. • Legislation requires the development of a Radiation Protection Programme (i.e., a transport management plan) • Some operations may also require a source security transport plan. 	ERI-04, ERP-01, OP-05
Health and Safety	<p><i>Occupational Safety and Health Act 1984</i> An Act to promote and improve standards for occupational safety and health, to establish the Commission for Occupational Safety and Health, to provide for a tribunal for the determination of certain matters and claims, to facilitate the coordination of the administration of the laws relating to occupational safety and health and for incidental and other purposes.</p>	SP-01, SP-02, SI-01, SI-02, SI-03, SI-04, SI-05, SI-06, SI-07



	<p>Fire Brigades Act 1942 For DFES functions under the Fire Brigades Act 1942, see Part VI of the Fire Brigades Act 1942. (26 July 2017)</p>	ERI-03, SP-02
	<p>Dangerous Goods Safety Act 2004 An Act relating to the safe storage, handling and transport of dangerous goods and for related purposes. The Act indicates those activities and substances which require licensing prior to use, storage or transport. The aim of the Act is to reduce or minimise the risk from dangerous goods.</p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p>Dangerous Goods Safety (General) Regulations 2007</p>	
	<p>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p>Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007</p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p>Public Health Act 2016 An Act to protect, promote and improve the health and wellbeing of the public of Western Australia and to reduce the incidence of preventable illness, and for related purposes.</p>	SP-1, SP-02, SI-02, SI-03, SI-04
Site Activities Infrastructure	<p>Main Roads Act 1930 Main Roads administers the Main Roads Act 1930. The primary purpose of the Main Roads Act 1930 is to provide for the construction, maintenance, supervision and management of highways, main roads and secondary roads. Other purposes of the Main Roads Act 1930 include the control of access to highways, main roads and secondary roads.</p>	OP-05, SI-05
	<p>Public Health Act 2016</p>	OP-02
Air Quality	<p>Environmental Protection (Ozone Protection) Policy 1993 No longer in force</p>	EP-06
Water Management and Protection	<p>Pollution of Waters by Oil and Noxious Substances Act 1987 <i>An Act relating to the protection of the sea and certain waters from pollution by oil and other noxious substances discharged from ships and places on land.</i></p>	EP-04, EP-08, EI-01
	<p>Country Areas Water Supply Act 1947 <i>Provides for the provision of reticulated water to country areas and safeguards water supplies. The Act defines legal boundaries of surface and groundwater drinking water sources and provides for by-laws that protect the water quality of these sources.</i></p>	OP-02, EP-04
	<p>Land Administration Act 1997 An Act to consolidate and reform the law about Crown land and the compulsory acquisition of land generally, to repeal the <i>Land Act 1933</i> and to provide for related matters.</p>	OP-09



	<i>Parks and Reserves Act 1895</i> An Act for the control and management of certain land reserved to the Crown.	OP-09
Heritage	<i>Aboriginal Heritage Act 1972</i> An Act to make provision for the preservation on behalf of the community of places and objects customarily used by or traditional to the original inhabitants of Australia or their descendants, or associated therewith, and for other purposes incidental thereto.	OP-02, OP-03
	<i>Heritage of Western Australia Act 1990</i> An Act to provide for, and to encourage, the conservation of places which have significance to the cultural heritage in the State, to establish the Heritage Council of Western Australia, and for related purposes.	OP-02, OP-03

PRINCIPLE COMMONWEALTH LEGISLATION AND OTHER REQUIREMENTS

Topic	Legislation	Relevant Procedures
Environmental Protection	<i>Environmental Protection and Biodiversity Conservation Act 1999</i> The objectives of the EPBC Act are to: <ul style="list-style-type: none"> • provide for the protection of the environment, especially matters of national environmental significance • conserve Australian biodiversity • provide a streamlined national environmental assessment and approvals process • enhance the protection and management of important natural and cultural places • control the international movement of plants and animals (wildlife), wildlife specimens and products made or derived from wildlife • promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources 	EP-01, EP-02, EP-03, EP-04, EP-05, EP-06, EP-07, EP-08, EI-01, EI-02, EI-08, EI-04
Radioactive Waste	<i>Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia 1992</i> – now withdrawn by ARPANSA but as this CoP is called up by the Radiation Safety (General) Regulations 1983 it must remain until the Regulations are amended.	RP-01, RI-01, RI-02



	<p>Code for Disposal Facilities for Solid Radioactive Waste (2018) This code describes the objectives for protection of human health and of the environment, drawing upon international best practice in relation to radiation protection and radioactive waste safety. The safety case and supporting safety assessment provide the basis for demonstration of safety and for authorisation. They will evolve with the development of the disposal facility, and will assist and guide decisions on its siting, design, operation, and closure. This publication, together with the Planned Exposure Code (RPS C-1, ARPANSA 2016), supersedes the Radiation Health Series (RHS) No. 35 Code of practice for the near-surface disposal of radioactive waste in Australia (1992) (NHMRC 1992).</p>	RP-01, RI-01, RI-02
	IAEA (1999) Safety Guide No. WS-G-1.1 Near Surface Disposal facilities for Radioactive Waste	
	National Radioactive Waste Management Act 2012	
	Australian Radiation Protection and Nuclear Safety Act 1998	
	Regulatory Guide: Licensing of Radioactive Waste Storage and Near Surface Disposal Facilities, March 2013	Safety assessment & safety case
Health and Safety	National Code of Practice for the Control of Workplace Hazardous Substances	SP-01, EP-07, OP-04, OP-05, OP-06, SI-04, SI-02, SI-06, SI-03
Transport	<p>Australian Code for the Transport of Dangerous Goods by Road and Rail Edition 7.7, 2020 Electronic only</p>	OP-05
	<p>Code for the Safe Transport of Radioactive Material (2019) This edition of the Code for the Safe Transport of Radioactive Material, RPS C-2 (commonly referred to as the Transport Code) replaces the Code of Practice for the Safe Transport of Radioactive Material (2008) (RPS 2). It adopts the International Atomic Energy Agency Regulations for the Safe Transport of Radioactive Material 2012 Edition (No. SSR-6). It is intended to establish uniform requirements for the transport of radioactive material in Australia by road, rail or those waterways not covered by the Maritime legislation.</p>	ERI-04, ERP-01, OP-05
Dangerous Goods	Class Labels for Dangerous Goods AS 1216-2006	EP-07, OP-04, OP-05, OP-06, SP-01
	<p>Packaging of Dangerous Goods AS2400.21-1986 Withdrawn ---Potentially AS ISO 16106-2007 TRANSPORT PACKAGES FOR DANGEROUS GOODS - DANGEROUS GOODS PACKAGINGS, INTERMEDIATE BULK CONTAINERS (IBCS) AND LARGE PACKAGINGS - GUIDELINES FOR THE APPLICATION OF ISO 9001</p>	EP-07, OP-04, OP-05
	Selection and Use of Emergency Procedure Guides for the Transport of Dangerous Goods AS2931-1999	SP-02, OP-05, ERP-01, ERP-02



	Dangerous Goods- Initial Emergency Response Guide HB 76.2004	SP-02, ERP-01, ERP-2, ERI-01, ERI-02, ERI-03, ERI-04
	AS 1678.0.0.001-2004 emergency procedure guide - transport - - vehicle fire	
	National Code of Practice for the preparation of Material Data Sheets 2 nd edition (NOHSC: 2011 2003)	SP-01, SP-02, ERP-01
Air Quality	Exposure Standards for Atmospheric Contaminants in the Occupational Environment (NOHSC: 3008) 1995	EP-06, SI-04, EI-02
Site Activities	National Standard for the Control of Major Hazardous Facility (NOHSC:2016) 1996	OP-09
	Code of Practice – Excavation 2005 Re-endorsed by Worksafe Feb 2014 The document provides practical guidance to prevent occupational injury and disease in all workplaces where excavation and associated earthworks are performed. Excavation work may range from shallow trenching and simple foundation excavation to large and complex excavations for buildings and structures and deep sewers where the risk of serious injury is significant.	OP-03
Heritage	Native Title Act 1993	OP-02
Planning & Development	Environmental Protection and Biodiversity Conservation Act 1999	OP-02
	AS 1940:2017 The storage and handling of flammable and combustible liquids	

APPENDIX R

2020 – 2021 Management Review Meeting Minutes



MANAGEMENT REVIEW MEETING INTACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

MINUTES

Date: 24 November 2020
Time: 9:00 am to 1:00 pm, 2.30 to 3.30 pm
Venue: Training Room, Dilhorn House, 2 Bulwer St, Perth 6000

Attendance:

Emma Savage-Jones (ESJ):	Finance IWDF Project Director
Brendon Atkinson (BA):	Finance IWDF Contract Manager
Mark Shepherd (MS):	FMC Project Director
Leanne Morton (LM):	FMC Project Manager
Stuart Parr (SP)	Radiation Safety Officer

Apologies: No apologies

Meeting Number: 13

1. Open and Welcome

LM welcomed those present to the November 2020 IWDF Management Review Meeting.

LM circulated, via email, the draft agenda seeking input on the 22 November 2020 and the final agenda was circulated to all participants on the 24 November 2020.

2. Minutes of the Previous Meeting

The minutes of the previous meeting held, 24 June 2020, were accepted by those present at that meeting as a true and accurate record and were finalised for inclusion in the 2019 – 2020 Performance and Compliance Report (PCR).

3. Business Arising from Previous Meeting

3.1 Review of BMW MP 10 Procurement Procedure

As reported at the last meeting the Minister for Finance, on 27 May 2020, announced that temporary changes to the procurement thresholds were implemented to maximise contracting



opportunities for local businesses and support economic recovery following the COVID-19 pandemic.

ESJ informed the Management Team that temporary changes to the procurement thresholds would remain in place until 31st December 2020.

3.2 Reporting to Radiological Council

LM advised that although all post 2008 Performance and Compliance Reports (PCRs) had been submitted to the Radiological Council Western Australia (RCWA) at the meeting held with the RCWA on 12th September 2019, the 2018-2019 PCR had been revised after the meeting with RCWA therefore the revised 2018-2019 should now be resubmitted to RCWA.

LM also advised that the draft 2019-2020 PCR should be provided to the RCWA for their information.

Action: LM to provide 2018 – 2019 PCR and draft 2019 - 2020 PCR on a portable drive to the RCWA at the meeting scheduled for the 3rd December 2020.

3.3 Waste Register (Database)

The IWDF Waste Inventory Database is almost complete.

The data from the 2020NRT01 disposal has now been added to the production database. There is still some work to be done in expanding the chemical summaries, but this work can be done gradually.

The following work has been now completed on the radioactive waste inventory spreadsheet:

- Review of base data line by line (35 by 1919 records). 1992, 1994, 2000, and 2002 data entered but not previously reviewed.
- Derivation of source term in Bq from descriptions e.g. activities in μCi or mCi converted to Bq and absorbed dose rate in $\mu\text{Gy/h}$ converted to Bq for consistency of units.
- Ensuring the right isotope is selected for derivation of total activity of package from waste owner records and decayed activity of package at disposal, e.g. when a package contains different isotope.
- Data input for 2008 disposal records (35 by 300 records)

Although some of the irregularities/discrepancies reported at the last meeting had now been resolved there are still some issues in relation to discrepancies between the Radiation Health



Database and the IWDF records which will require discussion with Radiation Health (WA) to achieve resolution.

The radioactive waste spreadsheet has been uploaded into the database test environment and is currently undergoing review to ensure that any issues are resolved before the data is uploaded into the production database.

It was agreed that once the data was in the production database spreadsheets would be generated from the database and provided to the RCWA for review and comment. The following spreadsheets will be generated for RCWA:

- All radiological data.
- Public data (chemical and radioactive) – as required by Commitment 7.3 of Ministerial Statement 562.

Once RCWA has provided feedback, the public data will be added to the IWDF page on WA.gov.au.

As there is potential for modification and corrections to various fields in the database, the issue of version control for spreadsheet extracts generated from the database was discussed. It was agreed that the date the spreadsheet is generated should be included on each page of the spreadsheet.

The issue of long-term custodianship of the database was discussed and it was agreed that this issue should be discussed with the representatives of RCWA at the meeting scheduled for 3rd December 2020.

Actions:

SP/LM – to meet with the Radiation Health to discuss the remaining discrepancies between the Radiation Health Database and the IWDF records.

BA – to investigate the process for adding the date generated to any spreadsheet generated from the database.

ESJ – discuss the matter of long-term custodianship of the IWDF waste inventory database with RCWA.

3.4 Record Keeping

It was reported that Finance have been working to record in the Department's records management system (Hewlett Packard Enterprise Records Manager also known as HPE Records Manager) and progressively re-organise the historical data/documents relating to the IWDF.



There was some discussion about the best way to maintain the updated copies of the IWDF electronic document library when updates are provided from the FMC. It was agreed that advice would be sought from the Finance Record Services Department.

Action: BA & ESJ to talk to the Records Coordinator, Records Services Department of Finance, for advice.

3.5 IWDF pages on WA.gov.au

The addition of some of the IWDF documents to the IWDF pages on WA.gov.au has been deferred as described below:

- IWDF Handbook: has been updated to include 2020NRT01 disposal but cannot be finalised until the CLC terms of reference are agreed.
- IWDF Waste Inventory: database testing and data resolution work is not yet complete.
- Chemical Guidelines: the chemical waste acceptance proforma has been converted to a smart form. There is a minor update to the guidelines text required.
- Radioactive Guidelines – the radioactive waste acceptance proforma has not yet been converted to a smart form as the content is likely to change after the IWDF Management Team has met with the RCWA on the 3rd December.

The 2-page brochure has been updated and can now be uploaded to the IWDF web page on WA.gov.au.

Actions:

LM/SP - update the chemical and radioactive Waste Acceptance Guidelines, as soon as possible after the meeting with RCWA and provide to BA for uploading to the IWDF page on WA.gov.au.

BA - organise for the 2-page IWDF brochure to be uploaded to the IWDF web page on WA.gov.au.

4. IWDF Management Systems

4.1 IWDF Management Plans

LM reported that a review of the Management Plans was undertaken in November 2020 and the following change was made:

- Management Plan 11 – The frequency of management review meetings was changed from annual to twice yearly.



4.2 Finance EHSMS and Procedures

All Finance procedures have been reviewed and where applicable updated. No significant changes were made to these procedures except minor updates to references.

4.3 Record Keeping Status update

All current IWDF documents continue to be recorded on the Finance HPE Records Manager system.

ESJ reported that the IWDF entries in the Department of Finance Retention and Disposal Schedule was reviewed on 7 September 2020 for completeness.

4.4 FMC EHSMS & FMC Procedures

FMC procedures will be reviewed during December and January.

4.5 Performance and Compliance Reporting

A copy of the draft 2019 – 2020 PCR, which includes the Close-out Report for the 2020NRT01 Disposal Operation was submitted to the EPA for approval via the Department of Water and Environmental Regulation (DWER) website on the 30th September 2020. To date no response from EPA has been received, however, the DWER confirmed receipt of the report on 16th October 2020. It was agreed that the DWER would be contacted in early January to enquire about approval progress.

A hardcopy of the draft 2019 – 2020 PCR was tabled at the CLC meeting held 1st October 2020 for the committee's information and review. Jan McLeod, Coolgardie community member, took custody of the document and has provided feedback on the content and asked for clarification on various sections of the document.

An electronic copy of the draft 2019 – 2020 PCR has been provided to Anna Killigrew, Coolgardie Community member.

Action: If a response from the DWER is not received before the end of December (three months after the report submission date), ESJ will send a follow up email to DWER on 11th January 2021 seeking status of approval progress.

4.6 Guidelines – Updates and Changes

- Chemical Guidelines - waste acceptance proforma has been converted to a smart form. There is a minor update to the guidelines text required and then the guideline can be uploaded to IWDF web page on WA.gov.au.



- Radioactive Guidelines – have not yet been converted to a smart form as the content the guidelines are likely to change after the IWDF Management Team has met with the RCWA on 3rd December 2020.
- Transport Guidelines – will be updated to include National Transport Commission (NTC) Australian Code for the Transport of Dangerous Goods by Road and Rail. Seventh edition, 7.7.
- Safety and Emergency Response (Reporting) Guideline – updated to replace ‘BMW’ with ‘Finance’.

4.7 Management Manuals and Policy – Updates and Changes

LM reported that the “IWDF *Environmental, Health & Safety and Quality Policy*” was updated in July 2020 to replace BMW with Finance and include ESJ’s new title. The ‘policy’ in the Finance Management Manual was updated to include the latest version of the policy.

Both FMC and Finance Management Manuals are scheduled to be reviewed during December/January.

4.8 Registers

LM reported that the Aspects and Impacts and Legal Registers had not yet been reviewed but were scheduled for review during January/February 2021.

4.9 Electronic Document Library

The following documents have recently been added to the Document Library:

- Australian Code for the Transport of Dangerous Goods by Road and Rail, Edition 7.7, 2020.
- Guide for Classification of Radioactive Waste, ARPANSA Radiation Protection Series G-4, 22 October 2020.

4.10 2020 – 2021 Action Plans

LM reported that performance against the 2020 – 2021 Action Plans is tracking well.



5. Compliance Audits Internal and External

5.1 Internal Compliance Audits

Compliances against the various instruments and management requirements for the 2020 – 2021 reporting period has not yet commenced except for an audit of compliance with Ministerial Statement 562 where no non-compliances were recorded.

LM informed the Management Team that at the last meeting it was reported that Finance was compliant with both conditions of the IWDF Environmental Licence for the 2019 – 2020 reporting period but when all compliance auditing was complete it was clear that this was not correct as there was one technical noncompliance for Condition 2 of the Licence (see below).

Condition 2 Notification of Intention to Dispose

The licensee shall notify the CEO in writing at least 3 months prior to the delivery of waste to the Intractable Waste Disposal Facility Mt Walton East.

The CEO of the DWER was advised of the proposed disposal operation, in writing, on the 12th December 2019. Transport of waste to the IWDF began 3rd February 2020. Therefore, the CEO of the DWER was not notified at least three months prior to delivery of waste to the IWDF.

Notification to the DWER occurred as soon as Finance became aware that a disposal operation at the IWDF was probable. Due to contractual arrangements at the location where the waste was stored there was a requirement that the waste be removed from its storage location before the end of February. It was not sensible or practical to transport the waste to another storage location and then on to the IWDF within such a short time frame therefore the waste was transported to the IWDF from 3rd February until 25th March.

Discussion with DWER has occurred and due to the expense of changing the license condition, it has been agreed that notification will occur earlier advising the DWER CEO of the intention to undertake a disposal campaign and the anticipated delivery date (hence meeting the three month notification condition). Once the disposal campaign is confirmed (i.e. agreements with waste owners are finalised, EPA approval received etc.) a follow up email will be sent to the DWER CEO confirming that the disposal is proceeding and to confirm the delivery date, or alternatively that the disposal is not proceeding.

5.2 Ongoing Suitability of Management Plans

Almost all system documents were implemented during the successful 2020 disposal operation where there were no incidents or issues. It has been therefore concluded by the IWDF Management Team that the management plans and other system documents continue to be fit for purpose.



5.3 External Compliance Audits

The report for the five yearly technical compliance audit completed by Andrew McCormick of ARPANSA, 22-24 October 2018, was received on the 6 February 2020.

A response to the audit findings was provided to ARPANSA in mid-September. ARPANSA reviewed the response and requested an online meeting to clarify several issues. A teleconference was held 24 November 2020.

After some discussion agreement was reached on the remaining issues and ARPANSA have committed to revising the audit report.

6. Non-conformance and Corrective Action Requests

Corrective Action Requests (CAR's) are still to be raised for the recent audit findings.

7. Monitoring

7.1 Groundwater Monitoring

Ongoing groundwater monitoring for October 2020 has been completed and ground water has not been detected in any of the monitoring bores.

7.2 Capping Monitoring

MJS reported on the most recent capping monitoring undertaken in October 2020. The very minor erosion in capping of the 2000RT01 disposal cell remains unchanged and the capping on the new 2020NRT01 trench has bedded down well.

7.3 Rehabilitation Monitoring (Annual)

MJS reported that the October 2020 rehabilitation monitoring showed good vegetation growth. No plant deaths were recorded other than where clearing of trench drains had impacted some vegetation adjacent to the drains.

The issue of continuing to monitor what is fully rehabilitated vegetation around the pre 2000 disposal cells was discussed. A vegetation survey completed, in October 2014, verified that the rehabilitated vegetation around the pre 2000 disposal cells was indistinguishable from the surrounding vegetation.



It was agreed that no further monitoring of the vegetation around the pre 2000 disposal cells should occur. Procedure documents and monitoring forms will be updated to reflect this change.

Action: LM to update procedure documents and monitoring forms to record the updated monitoring requirements

8. IWDF Infrastructure

8.1 Access Road - Current Management Status Report

Six new 'Private Road' signs which read "Private Road, Authorised Access Only, Government of Western Australia, Phone (08 65511600)" were installed on the Access Road during the last week in October.

ESJ advised that ARC Infrastructure, the company that manages and operates the State's rail network across the south west of Western Australia, intends to install active protection (boom gates and LED flashlights) to the Access Road level crossing in the early part of 2021.

8.2 Access Road - Current Condition Report

MJS reported that the Access Road was in good condition.

8.3 Replacement Infrastructure

No replacement infrastructure at the IWDF has been necessary since the last meeting. The fencing at the entrance of the IWDF has been upgraded to prevent casual visitors from going around the gate. The gate now has both chemical and radioactive warning signs attached.

9. Staff Training

LM advised that there had been two general site inductions completed for casual personnel required to assist with the installation of the new signs on the Access Road.

LM also advised that it may be beneficial for Finance personnel new to the IWDF to complete some IWDF training.

10. Radioactive Issues

10.1 IWDF Safety Assessment & Operations Safety Case

The IWDF operational safety assessment was submitted to Andrew McCormick of ARPANSA during October 2016 for high level review.



A high-level review of the IWDF operational safety assessment was received from ARPANSA on 15th October 2020. The review has been considered by the IWDF Management Team and a high-level response has been prepared for discussion with the RCWA at the meeting scheduled for 3rd December.

11. Community Liaison Committee

CLC meetings continue to be held quarterly, with meetings held on the 20th February, 24th June and 1st October 2020. The next meeting is scheduled for 8th December 2020.

12. Budget / Estimated Management Costs 2020 – 2021

There was a discussion about how the current budget is tracking for this financial year. It was acknowledged that more of the budget had been spent than expected but it was also recognised that several activities have occurred in the last few months that were not expected when the cost estimate for the budget was developed.

It was agreed that a review of the work still to be completed for the second half of the financial year would be undertaken and discussed at the next Ongoing Management Meeting.

13. Other Business

13.1 Internal Restructure Department of Finance

ESJ stated that there would be no change to the management of the IWDF and that ESJ would remain as the Proponent’s representative for the IWDF until 30th June 2021.

13.2 Disposal applications

The status of waste enquiries and applications is provided below.

Stage of progress	Radioactive	Chemical
Approved applications	8	0
Applications under assessment	4	0
Applications awaiting Assessment	4	0
Waste Enquiries in Progress	50	6



13.3 Firebreaks at the IWDF

The recent communication from DFES regarding the *'Bush Fire Risk Treatment Standards - residential and public buildings'* was discussed.

The firebreaks at the IWDF were cleared where required during the 2020NRT01 disposal operation. The firebreaks were also assessed during the October monitoring site visit and were found to be satisfactory. It was agreed that no further action is required.

13.4 Plan for meeting with RCWA

An agenda has been issued to all meeting attendees with supporting information.

14. Next Meeting

To be scheduled for end of May / early June 2021.



MANAGEMENT REVIEW MEETING INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

MINUTES

Date: 3 June 2021
Time: 10:00 am to 2:00 pm
Venue: Training Room, Dilhorn House, 2 Bulwer St, Perth 6000

Attendance:

Emma Savage-Jones (ESJ):	Finance IWDF Project Director
Brendon Atkinson (BA):	Finance IWDF Contract Manager
Mark Shepherd (MS):	FMC Project Director
Leanne Morton (LM):	FMC Project Manager
Stuart Parr (SP)	Radiation Safety Officer
Eleanor Hopkins	Finance (Observer)

Apologies: No apologies

Meeting Number: 14

1. Open and Welcome

LM welcomed those present to the June 2021 IWDF Management Review Meeting.

LM circulated, via email, the draft agenda seeking input on the 26 May 2021 and the final agenda was circulated to all participants on the 3 June 2021.

2. Minutes of the Previous Meeting

The minutes of the previous meeting held, 24 November 2020, were accepted by those present at that meeting as a true and accurate record on the 4 December 2020. The Management Review Meeting Minutes for the 24 November were tabled at the Community Liaison Committee Meeting held 8 December 2020.

3. Business Arising from Previous Meeting

3.1 Reporting to Radiological Council

BA advised that the RCWA had acknowledged receipt of the final version of the 2018 – 2019 IWDF Performance and Compliance Report (PCR) and 2019 - 2020 IWDF PCR for their



records. These reports also fulfil the Department of Finance annual reporting required under RCWA registration RS 13/2011 20590.

3.2 Waste Register (Database)

The development of the IWDF Waste Inventory Database is now complete.

The data from the 2020NRT01 disposal has been added to the production database. There is still some work to be done in expanding the chemical summaries for 2020NRT01. This work will be completed during June 2021.

There are still some issues in relation to discrepancies between the Radiation Health Database and the IWDF records which will require discussion with Radiation Health (WA) to achieve resolution.

An example of the publicly available spreadsheet to be provided via the IWDF page on WA.gov.au has been provided to the RCWA for their comment / feedback. Once RCWA has provided feedback, the public data will be added to the IWDF page on WA.gov.au.

3.3 Process for Adding Date to Spreadsheets Generated from Database

As there is potential for modification and corrections to various fields in the database, the issue of version control for spreadsheet extracts generated from the database was discussed. It was agreed that the date the spreadsheet is generated should be included on each page of the spreadsheet.

BA reported that this issue was now resolved as each time a new spreadsheet is generated from the production database, the date of creation is imbedded into the spreadsheet.

3.4 Long term Custodianship of the IWDF Database

The issue of long-term custodianship of the database was discussed at the previous meeting and it was agreed that this issue should be discussed with the representatives of RCWA at the meeting scheduled for 3 December 2020. This issue was not included on the agenda for the meeting held with RCWA on the 3 December as there were several higher priority issues to be addressed.

No further progress has been made on this issue.

3.5 Record Keeping

It was reported that Finance is continuing the work to record IWDF documents in the Department's records management system (Hewlett Packard Enterprise Records Manager



also known as HPE Records Manager) and are progressively re-organising the historical data/documents relating to the IWDF.

3.6 IWDF page on WA.gov.au

The text included on the IWDF page on WA.gov.au was updated 4 May 2021.

The following IWDF documents have been uploaded to the IWDF pages on WA.gov.au:

- IWDF Handbook (April 2021): updated to include the 2020NRT01 disposal and a new section describing the record keeping requirements for the IWDF; and
- the 2-page brochure.

IWDF Waste Inventory spreadsheet has not yet been uploaded to the IWDF page, as feedback has not been received from RCWA regarding the information contained within the spreadsheet.

4. IWDF Management Systems

4.1 Environmental, Health & Safety and Quality Policy Review

The Environmental, Health & Safety and Quality Policy was reviewed by the IWDF Management Team. The only change made to the policy was to update the Environmental, Health & Safety and Quality Management System requirements from the Australian Standards to the appropriate ISO references.

The management team agreed that the policy remains suitable and will be endorsed by the Finance IWDF Project Director.

4.2 IWDF Management Plans

LM reported that a review of the Management Plans was undertaken in November 2020 and the following changes were made:

- Management Plan 6 Improvement Program – Update to Radiation Instruction: Occupational Radiation Monitoring (Instruction RI- 02) V11 to include a 0.3 mSv/year dose constraint for the public. This change was in response to a partial non-compliance flagged as part of the 2018 ARPANSA Technical Audit. This modification also included additional monitoring and reporting to verify that the 0.3 mSv/year dose constraint is not exceeded.
- The IWDF cell final cover solution, which is intended to be implemented after 25 -30 years post disposal, will include a covering of 200mm of topsoil over the clay water shedding



dome (i.e., for the 1992 disposal cell, final coverage would occur by 2022). In response to a non-compliance from the 2018 ARPANSA Technical Audit, it is also intended to place below ground markers over the dome prior to the application of the 200mm soil layer. The final cover solution was provided on 8 December 2020 to the RCWA for comment and feedback.

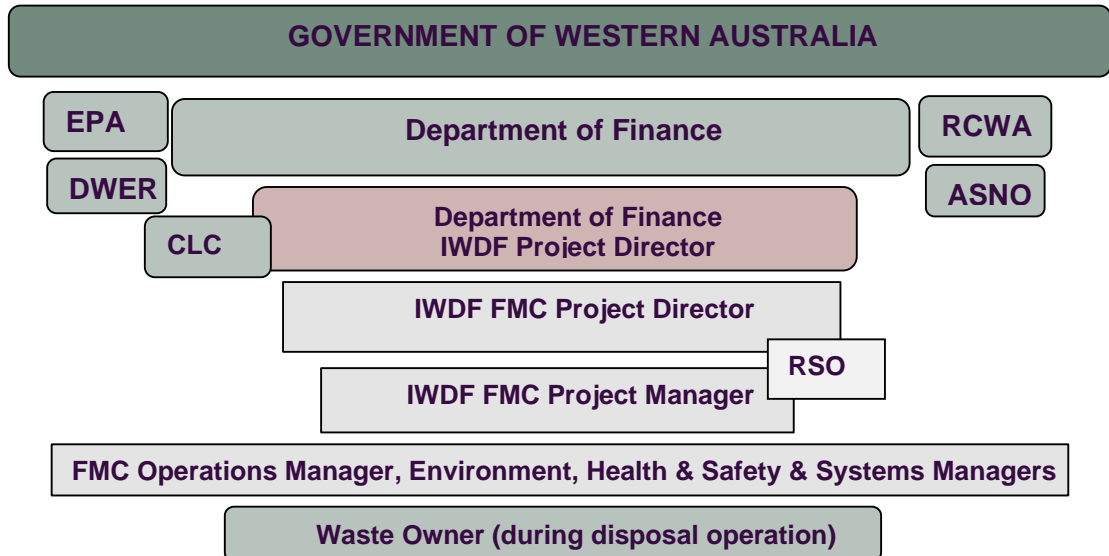
- Complete Safety Assessment & Safety Case – A draft Operations Safety Case was submitted to ARPANSA in October 2016 and comments were received back from ARPANSA in Q3 2020. A Response/Action Plan was prepared and provided to RCWA for review and feedback, in December 2020.

4.3 Management Manuals

The Finance and FMC management manuals were reviewed by the management team and modifications to the Governance Structure figure, as used in the Finance manual, was agreed. The new figure is shown below. The change will be made in the following documents for consistency.

- Finance Management and Policy Manual.
- IWDF Handbook.
- 2020 -2021 Performance and Compliance Report.

It was also agreed that a glossary of the abbreviations, as used in the governance structure figure, would be added included after the figure in the manual.





4.4 Finance EHSMS and Procedures

All Finance procedures have been reviewed and where applicable updated. No significant changes were made to these procedures except minor amendments to references and a change to the proponent's name (Department of Finance, Building Management and Works was changed to Department of Finance to reflect the current structure within Finance).

4.5 Record Keeping Status update

All current IWDF documents continue to be recorded on the Finance HPE Records Manager system.

ESJ reported that the IWDF entries in the Department of Finance Retention and Disposal Schedule was reviewed and updated to correct the naming convention for the IWDF on 7 December 2020. A copy of the updated entries was provided to the FMC for their records.

4.6 FMC EHSMS & FMC Procedures

FMC procedures were reviewed and updated as required during May 2021.

The only significant technical change was made to the *Rehabilitation Monitoring - Environmental Instruction EI-04* to include the change as agreed at the previous meeting, where no further monitoring of the vegetation around the pre 2000 disposal cells should occur.

The Procedure document and associated monitoring forms have been updated to reflect this change.

4.7 Performance and Compliance Reporting

A copy of the draft 2019 – 2020 PCR, which includes the Close-out Report for the 2020NRT01 Disposal Operation, was submitted to the EPA for approval via the Department of Water and Environmental Regulation (DWER) website, on the 30 September 2020.

The EPA provided notification to Finance on 4 May 2021 stating that the report was consistent with Commitment 6 of Ministerial Statement 562 and may now be advertised as publicly available.

An advertisement was placed on 31 May 2021 in the public notices section of the Western Australian and Kalgoorlie Miner newspapers to inform the public.

A draft copy of the 2020 -2021 PCR was reviewed electronically by the Management Team. The 2020 -2021 PCR would be finalised in early July 2021.



4.8 Registers

LM reported that the Aspects and Impacts and Legal Registers had been reviewed in May 2021. No significant changes were required.

5. 2020 – 2021 Action Plans

LM reported that performance against the 2020 – 2021 Action Plans was good. There were several outstanding issues, but the resolution of these issue was beyond the control of Finance. Most issues remain with RCWA.

It was agreed that the 2021 – 2022 Action Plan would only include actions not completed in the current financial year.

6. Compliance Audits Internal and External

6.1 Internal Compliance Audits

Compliances against the various instruments and management requirements for the 2020 – 2021 reporting period is now complete. **No** non-compliances were recorded.

6.2 Ongoing Suitability of Management Plans

It was concluded by the IWDF Management Team that the management plans and other system documents continue to be fit for purpose.

6.3 External Compliance Audits

The report for the five yearly technical compliance audit, as completed by Andrew McCormick of ARPANSA between 22-24 October 2018, was received on 6 February 2020.

A response to the audit findings was provided to ARPANSA in mid-September 2020. ARPANSA reviewed the response and requested an online meeting to clarify several issues. A teleconference was held 24 November 2020.

After some discussion, agreement was reached on the remaining issues and ARPANSA committed to revising the audit report.

Further discussions were held in April 2021 to clarify some issues and a final report will be issued in June 2021.

Non-conformance and Corrective Action Requests

There were **no** non-compliances resulting from the various compliance audits completed during May 2021 and therefore no Corrective Action Requests (CAR's) were raised.



8.0 Electronic Document Library

No new documents have been included in the Document library since December 2020.

9.0 Guidelines – Updates and Changes

Chemical Guidelines - waste acceptance proforma has been converted to a smart form.

- Radioactive Guidelines – substantial modifications have been made to the Radioactive Guidelines and Proforma. The Draft document has been provided (May 2021) to RCWA for comment.

10.0 Monitoring

10.1 Groundwater Monitoring

Ongoing groundwater monitoring for April 2021 has been completed and **no** ground water has been detected in any of the monitoring bores.

10.2 Capping Monitoring

The next capping monitoring is scheduled for October 2021.

10.3 Rehabilitation Monitoring (Annual)

The next rehabilitation monitoring is scheduled for October 2021.

11. IWDF Infrastructure

11.1 Access Road - Current Management Status Report

ESJ advised that ARC Infrastructure, the company that manages and operates the State's rail network across the southwest of Western Australia, intends to undertake preparation work for the installation of flashing lights and boom gates during June / July 2021.

11.2 Access Road - Current Condition Report

MJS reported that the Access Road, as assessed in April 2021, was in good condition.

11.3 Replacement Infrastructure

Preliminary investigations and pricing are currently being assessed for the replacement of the IWDF generator and fuel storage tank.



It is anticipated that this will be finalised in the next financial year.

12 Staff Training

LM advised that it may be beneficial for proposed Finance personnel with responsibility for the IWDF, to complete IWDF training in the following aspects.

- Introduction to the IWDF
- Discussion of Position Description (Duties)
- Question/Answer Session
- Introduction to the Management System
- Tour of the IWDF

It was agreed that as soon as the final decision had been made regarding Personnel training, this would be scheduled accordingly.

13 Radioactive Issues

14.1 IWDF Safety Assessment & Operations Safety Case

A high-level review of the IWDF operational safety assessment was received from ARPANSA on 15th October 2020. The review was considered by the IWDF Management Team, and a high-level response was prepared.

The high-level response was provided to RCWA for comment and feedback. To date no response has been received from RCWA.

14 Community Liaison Committee

CLC meetings continue to be held, with meetings held on 1 October and 8 December 2020 and 1 April 2021. The next meeting is scheduled for 10 June 2021.

15 Budget / Estimated Management Costs 2021 – 2022

MJS reported that the cost estimate for the coming financial year would be consistent with the current year.

16 Other Business

16.1 Internal Department of Finance

ESJ reported that BA (IWDF Project/Contract Manager) was moving to a new role within the Department of Finance. A replacement for BA would be decided before the end of June 2020.



16.2 Disposal applications

The status of waste enquiries and applications is provided below.

Stage of progress	Radioactive	Chemical
Approved applications	21	0
Applications under assessment	0	0
Applications awaiting Assessment	0	0
Waste Enquiries in Progress	0	0

17.2 Legal Deposit of IWDF documents

LM reported that Finance was required to comply with the *Legal Deposit Act 2012* and deposit the following documents within the State Library of Western Australia:

- 2020 – 2021 PCR
- IWDF Handbook (as updated)
- IWDF 2-page brochure (as updated).

ESJ requested that LM progress this requirement on behalf of Finance.

Actions:

LM to discuss with State Library of WA on the best methodology for meeting the requirements.

LM to update relevant procedure documents to include this requirement for future reference.

16.3 Plan for meeting with RCWA

It was agreed that given the number of outstanding issues with RCWA, Finance would seek to organise quarterly meetings with the RCWA.

17 Next Meeting

To be scheduled for end of November / early December 2021.

APPENDIX S

2020 – 2021 Action Plans



2020 – 2021 ACTION PLANS

Department of Finance (Finance) Action Plans detail specific improvement objectives for the continual improvement of the IWDF's management, and set quantitative targets, timeframes, and personnel for achieving these objectives.

The Action Plans are working documents and through regular review new improvement objectives are established as others are achieved. The Action Plans are linked closely to the Management Plans, which provide detail on the management goals and targets and provide a basis for the identification of improvement objectives. Further details on objectives and targets and the development of Action Plans are detailed in MP-03 Objectives and Targets and MP-04 Environmental, Health and Safety Management Program.

ENVIRONMENTAL ACTION PLAN 1 - AIR QUALITY					
Environmental, Health and Safety Policy Statement: Take all practical steps to minimise the impact of the site & operational activities on the environment, and the community, and ensure the protection of the health and safety of the public and the IWDF personnel by appropriate training of all personnel.					
Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records
Improvement Objective:					
N/A					
ENVIRONMENTAL ACTION PLAN 2 - REHABILITATION AND DECOMMISSIONING					
Environmental, Health and Safety Policy Statement: Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health & environmental protection by ensuring the adequacy of the EMS, the environmental policy & operational activities at the IWDF, through a process of continual review.					
Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records / status update
Improvement Objective: Re-establish removed and disturbed habitats to their original level of species diversity and land use					
Agreed approach for Final Cover for Waste Disposal Cells at the IWDF (Clayvault WA, May 2014)	Seek approval from Radiological Council for proposed approach	FMC Project Manager	sent to RC (Duncan) July 2015 & Nov 2019 with a request for their comment		As of May 2021, no response received. Issue was raised at meeting with reps

			and/or approval. Resent 3 Dec 2020,		from RCWA on 3 Dec. LM forwarded copies of Final Cover approach (2014) & Review of final cover approach (2019) to DS on afternoon of 3 Dec 2020.
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ENVIRONMENTAL ACTION PLAN 3 - EMERGENCY RESPONSE

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EMS, the environmental policy, and operational activities at the IWDF, through a process of continual review.
Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required completion Date</i>	<i>Actual Completion Date</i>	<i>Records/Status Update</i>
<i>Improvement Objective:</i>					
N/A					

ENVIRONMENTAL ACTION PLAN 4 - FLORA AND FAUNA

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF, through a process of continual review.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required Completion Date</i>	<i>Actual Completion Date</i>	<i>Records/Status Update</i>
<i>Improvement Objective:</i>					
Re-establish removed and disturbed indigenous habitats to their original level of species diversity; Prevent introduction of non-indigenous species; Prevent the removal or priority flora species					

No further monitoring of the vegetation around the pre 2000 disposal cells will occur.	Procedure documents and monitoring forms will be updated to reflect this change.	FMC System Manager	28 Feb, 2021	25 Feb, 2021	Form 38A rehab monitoring record (Rev 8) updated and Section 5.2 of EI-04 updated to reflect this change.
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ENVIRONMENTAL ACTION PLAN 5 - HEALTH AND SAFETY

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF, through a process of continual review. Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.

Improvement Target	Action	Responsibility	Required completion Date	Actual Completion Date	Records/Status Update
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Improvement Objective: To confirm the ongoing adequacy of the IWDF EMS by a process of continual review safe workplace and implement programs and strategies that ensure legislative compliance

ENVIRONMENTAL ACTION PLAN 6 - RADIATION

Environmental, Health and Safety Policy Statement:

Use recognised current best practices for near surface disposal of hazardous and low-level radioactive wastes and to remain aware of international advances in technology.

Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records/Status Update
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Improvement Objective: to ensure public database is accurate & publicly available

Completed procedure for providing public access. (This Item was deferred on previous action plan as functioning database / waste register is required before this can be actioned).	Draft a detailed procedure for allowing public access to the waste registers (chemical & radioactive).	Finance Project Manager	June 2021		Database is now complete, but the production database still requires final review by FMC & RSO and resolution of some discrepancies after discussion with Rad Health. Will be done in
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					June to be billed in the next financial year.
Finalised Database	Meet with the Radiation Health to discuss the remaining discrepancies between the Radiation Health Database and the IWDF records.	RSO & IWDF Project Manager	June 2021		FMC Project Manager & RSO still to meet with Rad Health.
Improvement Objective: To ensure IWDF activities comply with the code of practice for near surface disposal of radioactive waste in Australia. (1992)					
Safety Assessment / Case	<ul style="list-style-type: none"> • Safety Assessment for operational IWDF; • Safety Case for operational IWDF; • Select appropriate below-ground warning markers & put in place to help prevent inadvertent access to the waste forms; and • Document analysis of the behaviour of the cement matrix. 	RSO	Submitted to ARPANSA October 2016	October 2020	High level review of Safety Assessment received from ARPANSA October 2020.
Safety Assessment / Case	Update the Safety Assessment and Safety Case with changes as requested by ARPANSA and agreed by RCWA.	RSO	June 2021		Response/action plan submitted to reps of RCWA for comment 3 Dec 2020. As of May 2021, no comment received.
Long-term custodianship of the IWDF waste inventory database	Discuss the matter of long-term custodianship of the IWDF waste inventory database with RCWA.	Finance Project Director	May 2021		No further progress
ENVIRONMENTAL ACTION PLAN 7- TRANSPORT					
Environmental, Health and Safety Policy Statement:					
Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF, through a process of continual review.					

Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records
Improvement Objective:					
N/A					
ENVIRONMENTAL ACTION PLAN 8 – WATER					
Environmental, Health and Safety Policy Statement: Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EMS, the environmental policy and operational activities at the IWDF through a process of continual review.					
Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records
Improvement Objective:					
N/A					
ENVIRONMENTAL ACTION PLAN 9 – WASTE ACCEPTANCE					
Environmental, Health and Safety Policy Statement: Maintain strict adherence to the 'waste hierarchy' by ensuring no practically available reuse, recycling, treatment, destruction or alternative disposal options in Australia for all wastes accepted for disposal at the IWDF.					
Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records
Improvement Objective: To ensure that there are no inadvertent barriers to appropriate waste being disposed at the IWDF					
N/A					
ENVIRONMENTAL ACTION PLAN 10 – COMMUNITY LIAISON					
Environmental, Health and Safety Policy Statement: Liaise directly with the community on all operational activities & outcomes & ensure that all disposal details & monitoring /auditing records are both publicly available & securely stored for future reference.					

Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records
Improvement Objective: To ensure that information about the IWDF is readily available to the community & the community has every opportunity to learn of IWDF operations					
Addition of information relating to the IWDF on the Finance Website.	Add site information such as handbook and/or 2-page Brochure, to Finance IWDF webpage	Finance Contract Manager	Amended to 28 Feb 2021	2 March 2021 Updated version (14) of handbook added 3 May 2021	2-page IWDF brochure and Handbook uploaded to the IWDF web page on WA.gov.au.
Chemical and Radioactive Waste Acceptance Guidelines on IWDF page on WA.gov.au.	Update chemical and radioactive Waste Acceptance Guidelines, as soon as possible after the meeting with RCWA and provide to BA for uploading to the IWDF page on WA.gov.au.	FMC Project Manager & RSO	28 Feb 2021	Will not be completed as it has been decided that the WAGs will not be uploaded to website but the wording on website will be amended to require a request via IWDF email for WAGs	Waste Acceptance Guidelines – chemical provided to Finance for converting to a fillable form that can be provided on request. Radioactive WAG substantial review completed. Submitted to RCWA for comment 28 May 2021.
Improvement Objective: to ensure that the proponent continue to meet the requirements of proponent commitment 7.3.					
Publicly available waste disposal database	Using the Radioactive Source Inventory spreadsheet as a base add additional fields and populate with the additional information required to provide a base for database.	FMC Project Manager & RSO	30 Oct 2020	Production database complete Nov 2020	Database resident at Finance. Still to resolve minor issues with Rad Health but changes will be made in the production database.

Version control for spreadsheets generated from database	Investigate the process for adding the date generated to any spreadsheet generated from the database	Finance Contract Manager	30 March 2021		
ENVIRONMENTAL ACTION PLAN 11 - REVIEW OF MANAGEMENT					
Environmental, Health and Safety Policy Statement:					
Use recognised current best practices for near surface disposal of intractable & low-level radioactive wastes & to remain aware of international advances in technology. Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health & environmental protection by ensuring the adequacy of the EMS, the environmental policy & operational activities at the IWDF, through a process of continual review.					
Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records
Improvement Objective: To ensure that the Management Order, Licensing and Registrations and all system procedures are up to date.					
Submission of 2018-2019 PCR and draft 2019-2020 PCR to RCWA as part of annual reporting requirements	Provide 2018 – 2019 PCR and draft 2019 – 2020 PCR on a portable drive to the RCWA	FMC Project Manager	at the meeting scheduled for the 3 Dec 2020	3 Dec 2020	Acknowledgment from RCWA of receipt not yet received. RCWA have provided advice to EPA on 2019 -2021 PCR. 2019 -2020 PCR endorsed by EPA 4 May 2021.
2018 third party audit report required by RCWA registration	Follow up on status of Oct 2018 third party compliance audit report undertaken by ARPANSA	Finance Project Director	31 Dec 2020		Audit report issues have now been resolved (11 Feb 2021) final report received 15 March. Further issues were resolved 22 April – final report not yet received.

Revision	Date	Description	Prepared by:	Checked by:	Approved by:
0.1	22/06/20	Draft – for review at Management Review Meeting	LM		
1.0	30/06/20	Updated to include actions from MRM	LM		
1.1	5/07/20	Reviewed no change	LM		
1.2	20/08/20	Update to Action Plan 4	LM		
1.3	30/09/20	Reviewed no change	LM		
1.4	27/10/20	Update to Action Plan 6	LM		
1.5	16/12/20	Update to Action Plan 2 & 11	LM		
1.6	25/02/21	Update to Action Plan 11	LM		
1.7	02/03/21	Update to Action Plan 10	LM		
1.8	24/04/21	Updates to Action Plans 2, 4, 6,10 and 11	LM		
1.9	28/05/21	Updates to Plans 2, 10, and 11			

APPENDIX T

2020 – 2021 Document Control Matrix

**DOCUMENT CONTROL MATRIX
FINANCE-MF-06-2**

DOCUMENT DESCRIPTION	EXAMPLE	DOCUMENT PREPARER	DOCUMENT REVIEWER	DOCUMENT APPROVER	DOCUMENT CONTROLLER	DOCUMENT LOCATION
Contracts	Joint Cost Sharing Agreement	Finance IWDF Project Manager	Finance IWDF Project Director	Finance IWDF Project Director	Finance IWDF Project Manager	Finance Records Management System Files
Environmental & Health and Safety Management program and Systems	Guidelines, procedures, management manuals, safety assessment, safety case etc.	FMC Project Manager. FMC project Director, RSO	<i>FMC Project Manager</i> <i>FMC Project Director</i>	EPA & RCWA (as required) FMC Project Director	FMC Project Manager	Management System folder on both Finance & FMC servers
Project Correspondence	Letters, emails,	Finance IWDF Project Manager	Finance IWDF Project Director	IWDF Project Manager or Director	IWDF Project Manager	Finance files Copies – FMC files
Reports	Close out Report, PCR etc.	FMC Project Manager	Finance IWDF Project Manager	IWDF Management Team	FMC Project Manager	Document Library
Quotes and Requests for tender	IWDF site management consultancies	Finance Project Manager Consultants	Finance Project Manager	Finance Project Manager or Director	Finance Project Manager	Finance Records Management System files
Ministerial Documents	Ministerial briefings	FINANCE IWDF Project Manager FMC Project Manager	Finance Project Manager or Director	Finance Project Manager or Director	Finance Project Manager	Finance Records Management System files
Other Quality Critical correspondence	Non project letters, emails etc.	IWDF Project Manager	IWDF Project Manager	IWDF Project Manager or Director	IWDF Project Manager	Finance Records Management System files

DOCUMENT DESCRIPTION	EXAMPLE	DOCUMENT PREPARER	DOCUMENT REVIEWER	DOCUMENT APPROVER	DOCUMENT CONTROLLER	DOCUMENT LOCATION
Test and Monitoring Results	Monitoring results	FMC Project Manager FMC Environmental Manager	FMC Project Manager	FMC Project Director	FMC Project Manager	Finance Records Management System files
Key Studies and Reports	Fauna or vegetation and flora surveys	FMC Project Manager FMC Project Director FMC Environmental Manager, specialist consultants	FMC Project Manager, or Director	FMC Project Manager, or Director	FMC Project Manager	Finance Records Management System files
Figures/ drawings /designs	Location map, trench design etc.	Consultants FMC Project Manager	FMC Project Manager	FMC Project Manager	FMC Project Manager	Document library
Referrals to regulatory authorities for project or waste disposal approval	Letter to EPA, Radiological Council	FMC Project Manager FMC Project Director	Finance IWDF Project Manager	Finance IWDF Project Manager	Finance IWDF Project Manager FMC Project Manager	Finance Records Management System files, Document Library
Legislative documents (as specified in Legal registers)	<i>Environmental Protection Act 1986</i>	N/A	N/A	N/A	FMC Project Manager	Document Library

APPENDIX U

2020 – 2021 Access Road Condition Reports

IWDF MT WALTON EAST ACCESS ROAD ODOMETER START 22710
 CONDITION REPORT ODOMETER FINISH 22809

DATE 30/10/2020
 DRIVER MJS

IWDF-FORM-44

KEY:		Trafficable	T	kms		circle	NOTES*
		Soft - L Vehicles Only	S	railway	46	one	
		Un-trafficable	U				
	kms	kms					
	highway						
	0	100 sand	T S U				
	1	99 sand	T S U				
	2	98 sand	T S U				
	3	97 sand	T S U				
	4	96 sand	T S U				
powerline	5	95 sand	T S U				
	6	94 sand	T S U				
	7	93 sand	T S U				
	8	92 clay	T S U				
	9	91 s + gr	T S U				
	10	90 s + gr	T S U				
x-road	11	89 sand	T S U				
	12	88 sand	T S U				
wash	13	87 gravel	T S U				
wash	14	86 sand	T S U				
	15	85 sand	T S U				
	16	84 sand	T S U				
	17	83 sand	T S U				
wash (2)	18	82 sand	T S U				
	19	81 sand	T S U				
	20	80 sand	T S U				
	21	79 sand	T S U				
floodway	22	78 sand	T S U				
	23	77 sand	T S U				
	24	76 sand	T S U				
	25	75 sand	T S U				
wash	26	74 s + gr	T S U				
	27	73 sand	T S U				
	28	72 sand	T S U				
	29	71 sand	T S U				
	30	70 sand	T S U				
	31	69 sand	T S U				
wash	32	68 sand	T S U				
	33	67 sand	T S U				
	34	66 sand	T S U				
	35	65 sand	T S U				
	36	64 clay	T S U				
wash	37	63 sand	T S U				
	38	62 sand	T S U				
	39	61 sand	T S U				
	40	60 sand	T S U				
	41	59 sand	T S U				
	42	58 sand	T S U				
wash	43	57 clay	T S U				
	44	56 clay	T S U				
wash	45	55 clay	T S U				
railway	46	54 clay	T S U				
	47	53 sand	T S U				
	48	52 sand	T S U				
	49	51 gravel	T S U				
	50	50 sand	T S U				
	51	49 sand	T S U				
	52	48 sand	T S U				
	53	47 sand	T S U				
	54	46 sand	T S U				
	55	45 sand	T S U				
	56	44 sand	T S U				
	57	43 sand	T S U				
	58	42 sand	T S U				
	59	41 sand	T S U				
	60	40 clay	T S U				
floodway	61	39 clay	T S U				
floodway	62	38 clay	T S U				
	63	37 sand	T S U				
	64	36 sand	T S U				
	65	35 sand	T S U				
	66	34 sand	T S U				
wash	67	33 sand	T S U				
	68	32 sand	T S U				
	69	31 sand	T S U				
wash	70	30 sand	T S U				
	71	29 sand	T S U				
floodway	72	28 clay	T S U				
	73	27 clay	T S U				
	74	26 clay	T S U				
wash	75	25 s + gr	T S U				
	76	24 s + gr	T S U				
	77	23 clay	T S U				
wash	78	22 gravel	T S U				
	79	21 clay	T S U				
	80	20 s + gr	T S U				
	81	19 s + gr	T S U				
	82	18 s + gr	T S U				
	83	17 s + gr	T S U				
	84	16 s + gr	T S U				
	85	15 s + gr	T S U				
	86	14 s + gr	T S U				
	87	13 s + gr	T S U				
	88	12 s + gr	T S U				
	89	11 s + gr	T S U				
	90	10 s + gr	T S U				
wash	91	9 gravel	T S U				
	92	8 clay	T S U				
wash	93	7 clay	T S U				
	94	6 s + gr	T S U				
	95	5 sand	T S U				
	96	4 s + gr	T S U				
	97	3 s + gr	T S U				
	98	2 s + gr	T S U				
	99	1 IWDF	T S U				
	100	0 Camp	T S U				

*NOTES Water depth, blockage of drains, etc

Mt Walton East

EXTENDED IWDF ACCESS ROAD REPORT OCTOBER 2020

The access road is generally in excellent condition with a good cross-sectional shape along its length, with new deep offshoot drains and new culverts in flood prone areas. Much of the road in clayey areas was treacherous in the wet but has now been gravel sheeted and as a consequence is safely trafficable in most conditions. The surface of the road, however, is not as smooth as it was in June with some shallow potholes forming in the sandier areas and some corrugation formation in gravelly areas. These features are not of major concern and will no doubt be addressed during maintenance grading.

Generally, though, the road has never been in better condition, which does raise a question over the necessity for an 80km/h speed limit (particularly for light vehicles). The 80km/h limit was set when the road was first constructed and has not been altered since that time. It is not a vital point but may be worth a reassessment.

The following photos were taken at the locations shown on IWDF-Form-44.

Photo 1



View of sandy section of road looking south at the 94km mark, showing shallow potholes

Photo 2



View of road at 91km mark showing excellent condition of both cross-sectional shape and surface

Photo 3



New culvert

Photo 4



View of road passing through a gravelly sand area showing some minor corrugation development

Photo 5



Gravel sheet over sandy section, surface in good condition

Photo 6



View of gravel sheeted section through previously clay surfaced area, road has good shape too

Photo 7



Typical section south of railway line – good condition

Photo 8



Deep perpendicular drain designed to move water away from road and ensure seepage under road surface is minimised

Photo 9



Gravel sheeted section in generally good condition – some minor shallow potholes

Photo 10



View of Borrow Pit 04

IWDF MT WALTON EAST ACCESS ROAD ODOMETER START 32121
 CONDITION REPORT

DATE 30/3/2021

ODOMETER FINISH 32219

DRIVER MJS

IWDF-FORM-44

KEY:	Trafficable	T		kms		kms		circle one	NOTES*
	Soft - L Vehicles Only	S		railway	46	54	clay	T S U	(P1, 12, 13, 14)
	Un-trafficable	U			47	53	sand	T S U	(P15, 16, 17, 18)
					48	52	sand	T S U	(P19)
				wash	49	51	gravel	T S U	
					50	50	sand	T S U	VERY SMOOTH
highway			circle one						
	0	100	sand	T S U	(P1)				
	1	99	sand	T S U	MINOR CORRUGATIONS				
	2	98	sand	T S U					
	3	97	sand	T S U					
	4	96	sand	T S U					
powerline	5	95	sand	T S U	(P2)				GOOD SHAPE
	6	94	sand	T S U					
	7	93	sand	T S U					
	8	92	clay	T S U					
	9	91	s + gr	T S U					
	10	90	s + gr	T S U	(P3)				(P20)
x-road	11	89	sand	T S U	MOSTLY VERY SMOOTH	floodway	61	39	clay
	12	88	sand	T S U		floodway	62	38	clay
wash	13	87	gravel	T S U			63	37	sand
wash	14	86	sand	T S U			64	36	sand
	15	85	sand	T S U			65	35	sand
	16	84	sand	T S U			66	34	sand
	17	83	sand	T S U		wash	67	33	sand
wash (2)	18	82	sand	T S U			68	32	sand
	19	81	sand	T S U			69	31	sand
	20	80	sand	T S U		wash	70	30	sand
	21	79	sand	T S U			71	29	sand
floodway	22	78	sand	T S U	EXCELLENT CONDITION	floodway	72	28	clay
	23	77	sand	T S U			73	27	clay
	24	76	sand	T S U			74	26	clay
	25	75	sand	T S U		wash	75	25	s + gr
wash	26	74	s + gr	T S U			76	24	s + gr
	27	73	sand	T S U			77	23	clay
	28	72	sand	T S U		wash	78	22	gravel
	29	71	sand	T S U	(P4)		79	21	clay
	30	70	sand	T S U			80	20	s + gr
	31	69	sand	T S U			81	19	s + gr
wash	32	68	sand	T S U			82	18	s + gr
	33	67	sand	T S U			83	17	s + gr
	34	66	sand	T S U			84	16	s + gr
	35	65	sand	T S U			85	15	s + gr
	36	64	clay	T S U			86	14	s + gr
wash	37	63	sand	T S U			87	13	s + gr
	38	62	sand	T S U			88	12	s + gr
	39	61	sand	T S U			89	11	s + gr
	40	60	sand	T S U		wash	90	10	s + gr
	41	59	sand	T S U			91	9	gravel
	42	58	sand	T S U			92	8	clay
wash	43	57	clay	T S U	DEEP RUT ON SIDE DUE TO RAIN (P5)	wash	93	7	clay
	44	56	clay	T S U			94	6	s + gr
wash	45	55	clay	T S U			95	5	sand
railway	46	54	clay	T S U	(P6, 7, 8, 9, 10)		96	4	s + gr
	47	53	sand	T S U			97	3	s + gr
							98	2	s + gr
							99	1	IWDF
*NOTES	Water depth, blockage of drains, etc				100		0	Camp	T S U

Mt Walton East

EXTENDED IWDF ACCESS ROAD REPORT APRIL 2021

The access road is in excellent condition and quite smooth, with only minor corrugations in a few areas. It is in better condition than it was for the October 2020 inspection. Further gravel sheeting has been undertaken in the area roughly 15kms north of the railway line, which will make this area trafficable in all but the worst conditions.

The following photos were taken at the locations shown on IWDF-Form-44. The aim of the photos is to demonstrate the condition of the road and to indicate the type of signage present along the road – and in particular to record all of the signs associated with the railway line.

Photo 1



New sign on road near Great Eastern Highway

Photo 2



View of road at about 5km mark showing minor corrugations

Photo 3



Very smooth section of road at around the 10km mark

Photo 4



Minor erosion in sandy section of road at about 29km mark after heavy rainfall event

Photo 5



Rut in road approaching railway line from the south

Photo 6



First sign on approach to railway line from the south

Photo 7



Speed limit change on approach to railway line from the south

Photo 8



Overview photo showing sequence of signs on approach to the railway line (looking north)

Photo 9



Sequence of signs immediately south of the railway line

Photo 10



Second train speed warning sign

Photo 11



Last sign on approach to the railway line outside the rail corridor

Photo 12



Photo looking north from railway line

Photo 13



First sign north of railway line

Photo 14



Carina signs north of railway line (visible in the background of Photo 12)

Photo 15



Next set of Carina signs in the sequence shown in Photo 14

Photo 16



First sign in the sequence approaching the railway line from the north (Photo looking south)

Photo 17



Faded railway crossing sign on north side of railway line

Photo 18



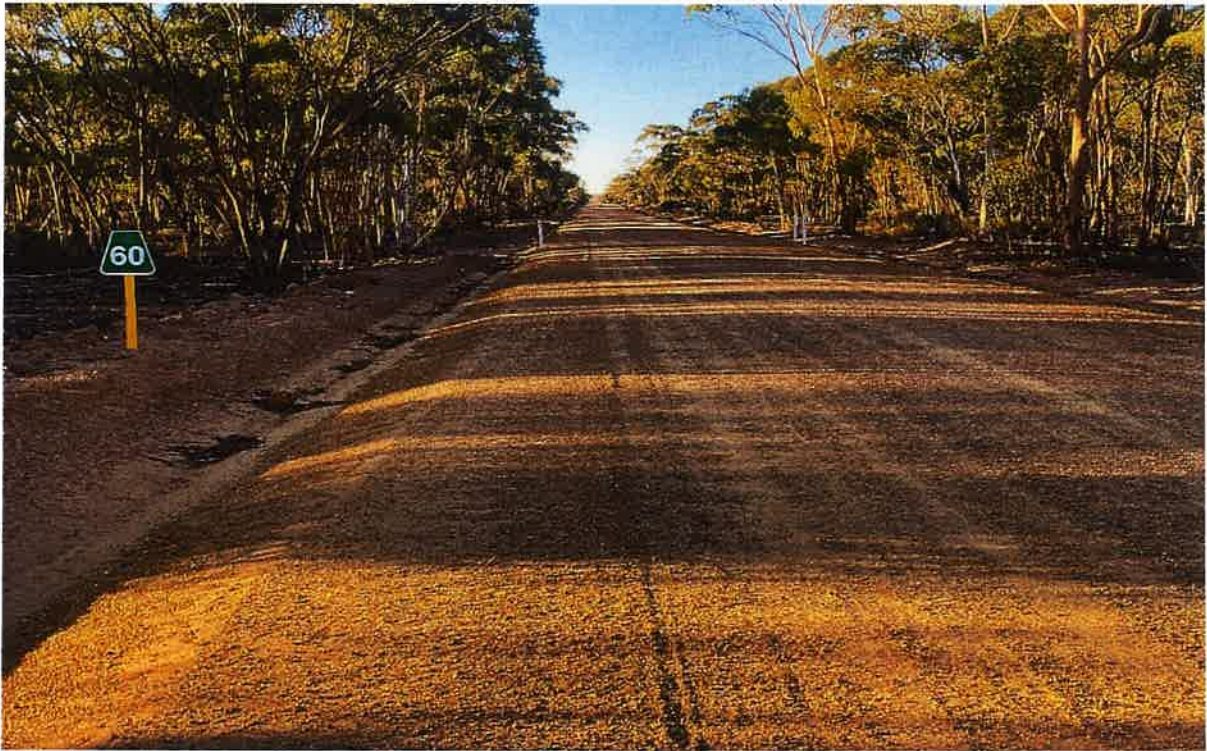
Sequence of signs closest to the railway line on the northside (wording the same as for similar signs on the south side)

Photo 19



Minor rutting and corrugations in sandy section 2km north of railway line

Photo 20



Excellent road surface at 60km marker with deep table drain

Photo 21



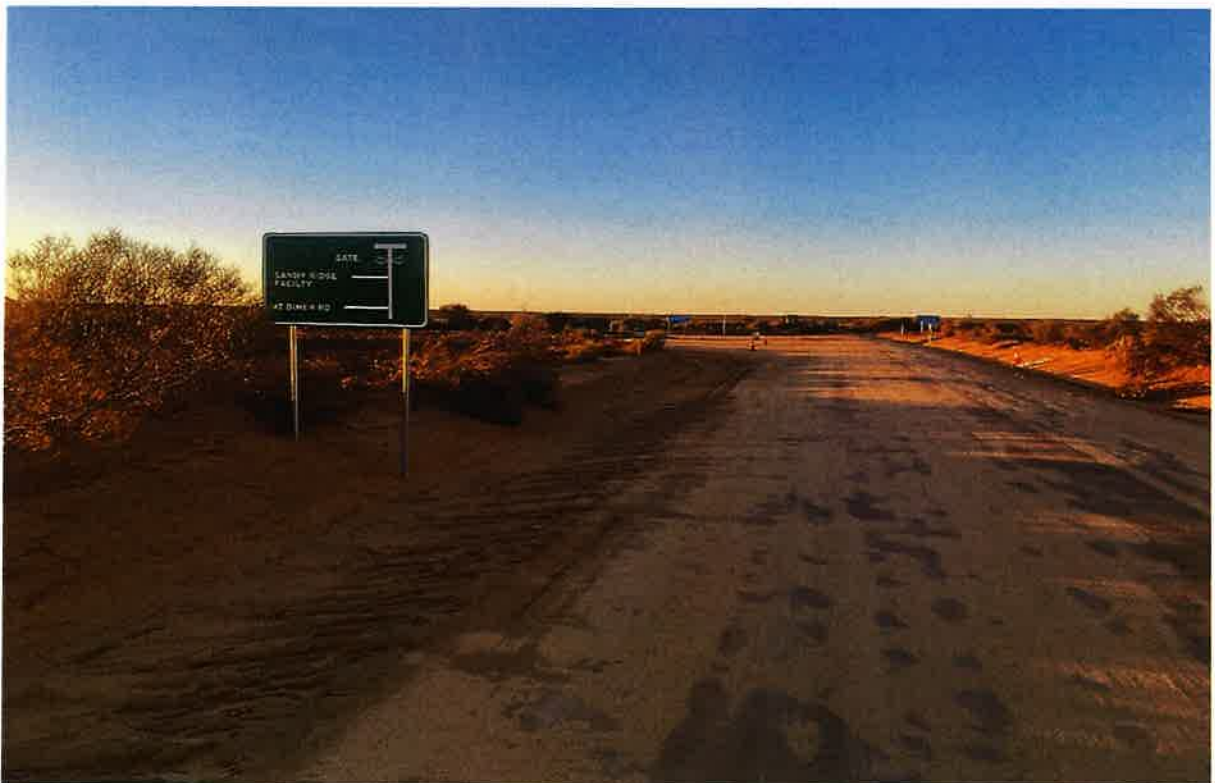
Water lying in deep pit at terminus of wide offshoot drain

Photo 22



Good surface with only minor corrugations at the 85km marker

Photo 23



Signs at intersection of the IWDF access road and the Sandy Ridge access road at 95km marker

Photo 24



Signs at intersection with IWDF gate in background

Photo 25



Road status sign near intersection, photo looking south

Photo 26



IWDF gate showing ridging due to firebreak clearing activities

APPENDIX V

2020 – 2021 Groundwater Monitoring Records

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

SAMPLING/GROUNDWATER MONITORING RECORD FORM IWDF-FORM-03b

Project No.: BMW2015-020		Location of Retained Samples: <u>N/A</u>				Sampled By: <u>MJS</u>					
Site Name: Intractable Waste Disposal Facility, Mt Walton East											
Location: IWDF											
Sample/Bore No.	Groundwater depth (if applicable)	Sample* Depth	Sampling Date	Sampling Time*	CoC No.	Sample Destination	Disposal Date	Collection Procedure	Sample Description and any Observations	Container Type	Preservation
GM1	<u>37.990</u>	<u>DRY</u>							<u>DRY</u>		
GM2	<u>40.655</u>	<u>DRY</u>							<u>DRY</u>		
GM3	<u>39.115</u>	<u>DRY</u>							<u>DRY</u>		
GM4	<u>30.080</u>	<u>DRY</u>							<u>DRY</u>		
GM5	<u>28.060</u>	<u>DRY</u>							<u>DRY</u>		
GM6	<u>25.905</u>	<u>DRY</u>							<u>DRY</u>		
GM7	<u>31.565</u>	<u>DRY</u>							<u>DRY</u>		
GM8	<u>31.400</u>	<u>DRY</u>							<u>DRY</u>		
GM9	<u>42.120</u>	<u>DRY</u>							<u>DRY</u>		

GENERAL COMMENTS:

WATER PROBE TESTED YES SIGNED: MJ Shepherd TO BE OPE

Duplicate Sample Yes No (N/A) Field Blanks Yes No (N/A) Original to file. Copy to Finance Project Manager within 14 days.

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA**

MONITORING REGISTER

IWDF-FORM-39

Date	Year	Monitoring Record Completed**	Locations monitored	Result	Analysis Required*
20 OCTOBER	2015	YES	GM1-9	DRY	N/A
12 APRIL	2016	YES	GM1-9	DRY	N/A
18 OCTOBER	2016	YES	GM1-9	DRY	N/A
20 APRIL	2017	YES	GM1-9	DRY	N/A
17 OCTOBER	2017	YES	GM1-9	DRY	N/A
19 APRIL	2018	YES	GM1-9	DRY	N/A
25 OCTOBER	2018	YES	GM1-9	DRY	N/A
2 APRIL	2019	YES	GM1-9	DRY	N/A
24 OCTOBER	2019	YES	GM1-9	DRY	N/A
2 FEBRUARY	2020	YES	GM1-9	DRY	N/A
9 APRIL	2020	YES	GM1-9	DRY	N/A
30 OCTOBER	2020	YES	GM1-9	DRY	N/A
31 MARCH	2021	YES	GM1-9	DRY	N/A

* For groundwater monitoring - See IWDF Form 21 for up-to-date list of parameters to be analysed
 ** For groundwater monitoring - IWDF Form 03
 For capping monitoring - IWDF Form 38b
 For rehabilitation monitoring - IWDF Form 38a.

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

SAMPLING/GROUNDWATER MONITORING RECORD FORM IWDF-FORM-03b

Page 1 of 1

Project No.: DF12020-001-ANMO		Location of Retained Samples: <u>N/A</u>					Sampled By: <u>MJS</u>			
Site Name: Intractable Waste Disposal Facility, Mt Walton East										
Location: IWDF										
Operation/Project: Monitoring	Date: <u>31/3/2021</u>	Sample Description and any Observations								
Sample/Bore No.	Groundwater depth (if applicable)	Sample* Depth	Sampling Date	Sampling Time*	CoC No.	Sample Destination	Disposal Date	Collection Procedure	Container Type	Preservation
GM1	<u>37.980</u>	<u>DRY</u>								<u>DRY</u>
GM2	<u>40.645</u>	<u>DRY</u>								<u>DRY</u>
GM3	<u>39.115</u>	<u>DRY</u>								<u>DRY</u>
GM4	<u>30.075</u>	<u>DRY</u>								<u>DRY</u>
GM5	<u>28.058</u>	<u>DRY</u>								<u>DRY</u>
GM6	<u>25.900</u>	<u>DRY</u>								<u>DRY</u>
GM7	<u>31.565</u>	<u>DRY</u>								<u>DRY</u>
GM8	<u>31.400</u>	<u>DRY</u>								<u>DRY</u>
GM9	<u>42.114</u>	<u>DRY</u>								<u>DRY</u>

GENERAL COMMENTS:

WATER PROBE TESTED YES SIGNED: MJ Shepherd TO MJ Shepherd BE

Duplicate Sample Yes No N/A Field Blanks Yes No N/A Original to file. Copy to Finance Project Manager within 14 days.

APPENDIX W

2020 – 2021 Internal Audit Schedule

**INTERNAL MANAGEMENT AUDIT SCHEDULE
FINANCE-MF-11-1**

X = audit of procedure scheduled

X = Audit of procedure completed

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2020 - 21											
	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21
Ministerial Statement 562						X						X
DFI MANAGEMENT PROCEDURES												
MP-01 Aspects and Impacts										X		
MP-02 Applicable Laws, Regulations and other Requirements											X	
MP-03 Objectives and Targets										X		
MP-04 Environmental, Health and Safety Management Program											X	
MP-05 Communications and Public Relations										X		
MP-06 Document and Data Control											X	
MP-07 Management of Records										X		
MP-08 Operational Planning											X	
MP-09 Training										X		
MP-10 Procurement											X	

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2020 - 21											
	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21
MP-11 Management Audits										X		
MP-12 Management Review										X		
MP-13 Control of Non conformances and Corrective and Preventative Action										X		
FMC MANAGEMENT PROCEDURES												
FMP 1 Document & Data Control										X		
FMP 2 Records Management										X		
FMP 3 Training & Competencies										X		
FMP 4 System Auditing & Compliance										X		
FMP 5 Control of System non-conformances										X		
FMP 6 Control & Maintenance of Equipment										X		
FMC OPERATIONAL PROCEDURES & INSTRUCTIONS												
OP1 Assessment of Applications for Disposal										X		
OP 2 Planning Documentation & Approval for Disposal										X		
OP 3 Excavation of Trench										X		
OP 4 Waste Preparation for Disposal										X		
OP 5 Waste Loading & Transport										X		
OP 6 Waste Delivery Acceptance & Disposal										X		
OP 7 Capping Rehabilitation & Demobilization										X		
OP 8 Operation Close-out										X		
OP 9 Ongoing & General Management of IWDF										X		

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2020 - 21											
	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21
OP10 Operation Site Management									X			
OI 1 Waste Inspection									X			
FMC ENVIRONMENTAL PROCEDURES & INSTRUCTIONS												
EP 1 Vegetation Management									X			
EP 2 Fauna Management									X			
EP 3 Environmental Monitoring									X			
EP 4 Water Management									X			
EP 5 Rehabilitation Management									X			
EP 6 Air Quality & Dust Management									X			
EP 7 Site Waste Management									X			
EP 8 Fuel Oil & Hazardous Materials Management									X			
EP 9 Environmental Incident Reporting									X			
EI 1 Groundwater Monitoring									X			
EI 2 Soil & Dust Sampling									X			
EI 3 Capping Monitoring									X			
EI 4 Rehabilitation Monitoring									X			
RADIATION MANAGEMENT PROCEDURES & INSTRUCTIONS												
RP 1 Radiation Management											X	
RI 1 Gamma Radiation Monitoring											X	
RI 2 Occupational Radiation Monitoring											X	
SAFETY MANAGEMENT PROCEDURES & INSTRUCTIONS												
SP 1 Health & Safety Management & Planning										X		
SP 2 Operation Site Safety Management										X		
SI 1 Excavation Safety										X		
SI 2 Personal protective Equipment										X		
SI 3 Hygiene & Decontamination										X		

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2020 - 21											
	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21
SI 4 Occupational Monitoring										X		
SI 5 Communication & Traffic Control										X		
SI 6 First Aid										X		
SI 7 Heavy Machinery Operations										X		
SI 8 Exclusion Zones										X		
EMERGENCY RESPONSE PROCEDURES & INSTRUCTIONS												
ERP 1 Incident Prevention, Reporting & Investigation											X	
ERP 2 Emergency Response Management											X	
ERI 1 Injury & Evacuation Response											X	
ERI 2 Waste Incident & Spill Response											X	
ERI 3 Fire Response											X	
ERI 4 Transport Emergency Response											X	

AUDIT SCHEDULE APPROVED: LM DATE: June 2020 REVISION: 1

APPENDIX X

2020 – 2021 Management Review Meeting Agendas



IWDF MT WALTON EAST MANAGEMENT REVIEW MEETING

AGENDA

Date: Tuesday 24th November 2020

Time: 9.00 am

Venue: Meeting/Training Room, Aurora Environmental, Dilhorn House, 2 Bulwer St, Perth

1. Open and Welcome

1.1 Agenda Outline – LM

2. Minutes of the Previous Meeting

3. Business Arising from Previous Meeting

3.1 Procurement – MP 10 Procurement – are Temporary Changes still in place? (LM, ESJ)

3.2 Reporting to Radiological Council – 2018/2019 & 2019/2020 reports (LM)

3.3 Chemical & Radioactive Waste Database/Registers - Update (BA/SP/LM)

3.4 Record Keeping – ongoing project trimming historical IWDF documents (BA/ESJ)

3.5 Finance website - Status (BA/ESJ/LM)

4. IWDF Management Systems

4.1 Management Plans - updates (LM)

4.2 Finance EHSMS & BMW Procedures (LM)

4.3 Record Keeping Status Update – R&D Schedule for Dept of Finance (BA)

4.4 FMC EHSMS & FMC Procedures (LM)

4.5 PCR July 2019 to June 2020 (draft) (LM/ESJ)

4.6 Guidelines – changes since last meeting (LM)

4.7 Environmental, health & safety and quality policy review and update (LM)

4.8 Management Manuals – updates and changes (LM)

5. Action Plans

5.1 Performance for 2019 – 2020 Action Plan (LM)

6. Compliance Audits - Internal and External

6.1 Ministerial Statement (LM)

6.2 License, Permit & Registration (LM)

6.3 Finance Management System (LM)

6.4 FMC Management System (LM)

6.5 Management Plans - Performance against requirements of management plans (LM)

6.6 Ongoing Suitability of Management Plans (LM)

7. Legislation, Regulation and Guideline Changes

7.1 Electronic Document Library (LM)

7.2 Update to Register of Legislative and other Requirements (LM)

7.3 Update to Chemical Waste Acceptance Proforma (LM)

7.4 Update to Radioactive Waste Acceptance Proforma (SP/LM)

7.5 Update to Safety and Emergency Response (Reporting) Guideline (LM)

8. Nonconformance and Corrective and Preventative Actions

8.1 Non – conformances from 2019 – 2020 audits reported in PCR

9. Aspects and Impacts

9.1 Register (LM)

10. Monitoring

10.1 Groundwater (annual) (MJS)

10.2 Capping (annual) (MJS)

10.3 Rehabilitation (annual) (MJS)

10.4 Flora and vegetation Survey (MJS)

11. IWDF Infrastructure

11.1 Access Road Current status report (ESJ)

11.2 Access Road Current condition report (MJS)

11.3 Replacement of Infrastructure – road signs (MJS)

12. Staff Training Needs

12.1 IWDF Site Inductions (LM)

13. Radioactive Issues

13.1 IWDF Safety Assessment / Operations Safety Case – Status (SP/ESJ)

13.2 Technical Compliance Audit completed by ARPANSA - Status (LM/ESJ)

14. Community Liaison Committee

14.1 Discussion about various issues raised by the CLC during the 2020 meetings.

15. Budget / Estimated Costs

15.1 Performance against FMC 2020 – 2021 estimated costs (LM)

16. Other Business

16.1 Update on the re-structure of the Department of Finance (ESJ)

16.2 Firebreaks at the IWDF (LM/MJS/BA)

16.3 Disposal applications (RSO)

16.4 Plan for meeting with RCWA – agenda (all)

17. Next Meeting



IWDF MT WALTON EAST MANAGEMENT REVIEW MEETING

AGENDA

Date: Thursday 3rd June 2021

Time: 9.00 am

Venue: Meeting/Training Room, Aurora Environmental, Dilhorn House, 2 Bulwer St, Perth

1. Open and Welcome

1.1 Agenda Outline – LM

2. Minutes of the Previous Meeting

3. Business Arising from Previous Meeting

3.1 Reporting to Radiological Council – 2018/2019 & 2019/2020 reports (LM)

3.2 Chemical & Radioactive Waste Database/Registers - Update (BA/SP/LM)

3.3 Meeting with the Radiation Health to discuss the remaining discrepancies between the Radiation Health Database and the IWDF records.

3.4 Process for adding the data generated to spreadsheets generated from the database.

3.5 Long-term custodianship of the IWDF waste inventory database - discussion with RCWA (ESJ).

3.6 Record Keeping – ongoing project entering historical IWDF documents into Finance Document Management System (BA/ESJ)

3.7 Finance IWDF website content - status update (BA/ESJ/LM)

4. IWDF Management Systems

4.1 Environmental, health & safety and quality policy review and update (LM)

4.2 Management Plans - updates (LM)

4.3 Management Manuals – updates and changes (LM)

4.4 Finance EHSMS Procedures review, update, and approval (LM)

4.5 Record Keeping Status Update – annual review of R&D Schedule for Dept of Finance (ESJ)

4.6 FMC EHSMS & Procedures review, update, and approval (LM)

4.7 PCR July 2020 to June 2021 (LM/ESJ)

5. Action Plans

5.1 Performance for 2020 – 2021 Action Plan – final status (LM)

5.2 Draft 2021 – 2022 Action Plan

6. Compliance Audits - Internal and External

6.1 Ministerial Statement (LM)

6.2 License, Permit & Registration (LM)

6.3 Finance Management System (LM)

6.4 FMC Management System (LM)

6.5 Management Plans - Performance against requirements of management plans (LM)

6.6 Ongoing Suitability of Management Plans (LM)

7. Nonconformance and Corrective and Preventative Actions

7.1 Non – conformances from 2020 – 2021 audits.

8. Electronic Document Library

8.1 Recent updates and changes

9. Guideline Review and Changes

9.1 Chemical Waste Acceptance Guidelines (LM)

9.2 Radioactive Waste Acceptance Proforma (SP/LM)

9.3 Update to Safety and Emergency Response (Reporting) Guideline (LM)

10. Legislation, Regulation

10.1 Review and update to Register of Legislative and other Requirements (LM)

10. Aspects and Impacts

10.1 Review and update to Aspects and Impacts Register (LM)

11. Monitoring

11.1 Groundwater (annual) (MJS)

11.2 Capping (annual) (MJS)

11.3 Rehabilitation (annual) (MJS)

11.4 Flora and vegetation Survey (MJS)

12. IWDF Infrastructure

12.1 Access Road Current status report (ESJ)

12.2 Access Road Current condition report (MJS)

12.3 Replacement of Infrastructure – Fuel storage tank and generator (MJS)

13 Staff Training Needs

13.1 FMC Inductions (LM)

13.2 New Finance IWDF personnel inductions (LM)

14 Radioactive Issues

14.1 IWDF Safety Assessment / Operations Safety Case – Status (SP/ESJ)

14.2 Technical Compliance Audit completed by ARPANSA - Status (LM/ESJ)

15 Community Liaison Committee

15.1 Discussion about various issues raised by the CLC during the 2020/2021 meetings.

16 FMC Performance

16.1 Performance against FMC 2020 – 2021 estimated costs (MJS)

16.2 Estimated FMC costs for 2021 – 2022 (MJS)

16.3 FMC performance against Finance contract management plan (BA, ESJ)

17 Other Business

17.1 Update on IWDF management structure within the Department of Finance (ESJ)

17.2 Legal deposit requirements for relevant IWDF documents (LM)

17.3 Disposal applications (RSO)

18 Next Meeting

To be scheduled for November / December 2021

APPENDIX Y

2020 – 2021 Site Visit Checklists

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA
SITE VISIT CHECKLIST
IWDF-FORM-52

Pre-Visit Check	Tick
You will be visiting the site with at least one other person	<input checked="" type="checkbox"/>
At least one person from Finance (e.g. IWDF Project Manager) is aware of your visit	<input checked="" type="checkbox"/>
You have a satellite phone and will phone a nominated person to inform them of your safe arrival & return	<input checked="" type="checkbox"/>

Site Visit Check	
Reason for Inspection/Visit: GROUNDWATER, REHABILITATION + CAPPING MONITORING + SIGN ERECTION	
Visitor/Inspector: MJS	Affiliation: AURORA ENVIRONMENTAL
Other Visitors (at least one other person to be at site): SP, JM, LR	
Date: 26/10/2020 - 30/10/2020	
Time Arrived: 1930	Time Departed: 0900

Issue/Action	Checked (tick)	Comments (Give any details regarding quantities of supplies, non-compliance, requirements for maintenance, etc.)
Access Road Condition Report	<input checked="" type="checkbox"/>	IWDF Form-44
General Supplies	<input checked="" type="checkbox"/>	
Fuel	<input checked="" type="checkbox"/>	IWDF Form-51 200L COLLECTED FROM KALGOORLIE
Water - potable	<input checked="" type="checkbox"/>	1/3 FULL
Water - non-potable	<input checked="" type="checkbox"/>	1/4 FULL
Food/provisions/domestic supplies	<input checked="" type="checkbox"/>	
Security		
Locks to all buildings intact	<input checked="" type="checkbox"/>	
All trench fences intact & locked	<input checked="" type="checkbox"/>	
All signs to fences intact/present	<input checked="" type="checkbox"/>	
Infrastructure		
Fire extinguishers in place	<input checked="" type="checkbox"/>	
Generator operational	<input checked="" type="checkbox"/>	NEEDED NEW BATTERY
Kitchen/toilet operational	<input checked="" type="checkbox"/>	
Weather station intact	<input checked="" type="checkbox"/>	
Phone & internet operational	<input checked="" type="checkbox"/>	REMOVED, HAD 2 PORTABLE SAT PHONES
Above ground markers intact	<input checked="" type="checkbox"/>	
Maintenance		
Electrical tagging up-to-date	<input checked="" type="checkbox"/>	
Fire extinguishers up-to-date	<input checked="" type="checkbox"/>	
Generator serviced	<input checked="" type="checkbox"/>	
Monitoring		
Groundwater monitoring	<input checked="" type="checkbox"/>	IWDF Form-03
Capping monitoring	<input checked="" type="checkbox"/>	IWDF Form-38b
Rehabilitation monitoring	<input checked="" type="checkbox"/>	IWDF Form-38a
Radiation monitoring	<input checked="" type="checkbox"/>	RI-01
Firebreaks/camp/access road check	<input checked="" type="checkbox"/>	
Other (specify)	<input checked="" type="checkbox"/>	

Post-Visit Check	
Confirmed safe return: YES	Time Departed: 1136
Signed: MJ Shepherd	Time: 1910
	Date: 30/10/2020

Original to FMC Project Manager. Copy to Finance IWDF Project Manager.

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA
SITE VISIT CHECKLIST
IWDF-FORM-52

Pre-Visit Check	Tick
You will be visiting the site with at least one other person	<input checked="" type="checkbox"/>
At least one person from Finance (e.g. IWDF Project Manager) is aware of your visit	<input checked="" type="checkbox"/>
You have a satellite phone and will phone a nominated person to inform them of your safe arrival & return	<input checked="" type="checkbox"/>

Site Visit Check	
Reason for Inspection/Visit: GROUNDWATER MONITORING	
Visitor/Inspector: MJS	Affiliation: AURORA ENVIRONMENTAL
Other Visitors (at least one other person to be at site): SP	
Date: 30/3/2021 - 1/4/2021	
Time Arrived: 1800	Time Departed: 1000

Issue/Action	Checked (tick)	Comments (Give any details regarding quantities of supplies, non-compliance, requirements for maintenance, etc.)
Access Road Condition Report	<input checked="" type="checkbox"/>	IWDF Form-44
General Supplies	<input checked="" type="checkbox"/>	
Fuel	<input checked="" type="checkbox"/>	IWDF Form-51
Water - potable	<input checked="" type="checkbox"/>	1/4 FULL
Water - non-potable	<input checked="" type="checkbox"/>	1/5 FULL
Food/provisions/domestic supplies	<input checked="" type="checkbox"/>	
Security		
Locks to all buildings intact	<input checked="" type="checkbox"/>	
All trench fences intact & locked	<input checked="" type="checkbox"/>	
All signs to fences intact/present	<input checked="" type="checkbox"/>	
Infrastructure		
Fire extinguishers in place	<input checked="" type="checkbox"/>	
Generator operational	<input checked="" type="checkbox"/>	U/S ELECTRICAL PROBLEM
Kitchen/toilet operational	<input checked="" type="checkbox"/>	
Weather station intact	<input checked="" type="checkbox"/>	
Phone & internet operational	<input checked="" type="checkbox"/>	REMOVED
Above ground markers intact	<input checked="" type="checkbox"/>	
Maintenance		
Electrical tagging up-to-date	<input checked="" type="checkbox"/>	
Fire extinguishers up-to-date	<input checked="" type="checkbox"/>	
Generator serviced	<input checked="" type="checkbox"/>	U/S NEEDS REPAIR OR REPLACEMENT
Monitoring		
Groundwater monitoring	<input checked="" type="checkbox"/>	IWDF Form-03
Capping monitoring	<input checked="" type="checkbox"/>	IWDF Form-38b
Rehabilitation monitoring	<input checked="" type="checkbox"/>	IWDF Form-38a
Radiation monitoring	<input checked="" type="checkbox"/>	RI-01
Firebreaks/camp/access road check	<input checked="" type="checkbox"/>	
Other (specify)	<input checked="" type="checkbox"/>	
Post-Visit Check		Time Departed: 1230 (COORARDIE)
Confirmed safe return: YES		Time: 1845
Signed: MJ Shepherd		Date: 1/4/2021

Original to FMC Project Manager. Copy to Finance IWDF Project Manager.

APPENDIX Z

2020 – 2021 Capping Monitoring Records

**IWDF MT. WALTON EAST
TRENCH CAPPING PHOTOS
OCTOBER 2020**

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

CAPPING MONITORING RECORD IWDF-FORM-38b

Project No.: DF12020-001 ANIMO		Storage Location of Photos: Aurora Environmental		Monitored By: MJS							
Site Name: Intractable Waste Disposal Facility, Mt Walton East		Client: Department of Finance		Date: 30/10/2020							
Trench No.	Location/ Photo No.	Date	Time	Erosion channels?			Subsidence?			View	Description and Other Comments
				Y/N	Number	Depth*	Y/N	Number	Depth*		
2020NRT01	Loc. 1	30-Oct	10:09	N	-	-	N	-	-	Compound	New Trench
	Loc. 2	30-Oct	10:13	N	-	-	N	-	-	Dome	New Trench
2008RT01	Loc. 1	30-Oct	10:19	Y	Numerous	1-5cm	N	-	-	Compound	Minor short channels
	Loc. 2	30-Oct	10:23	Y	2	1-3cm	N	-	-	Dome	Minor short channels
2002RT01	Loc. 1	30-Oct	9:59	N	-	-	N	-	-	Compound	
	Loc. 2	30-Oct	10:03	N	-	-	N	-	-	Dome	
2000RT01	Loc. 1	30-Oct	9:36	Y	Numerous	1-5cm	N	-	-	Compound	Similar to Previous Observations
	Loc. 2	30-Oct	9:38	Y	2	3-5cm	N	-	-	Dome	Main channels shallower
98NRT02	Loc. 1	30-Oct	9:11	N	-	-	N	-	-	Compound	
	Loc. 2	30-Oct	9:14	N	-	-	N	-	-	Dome	
98NRT01	Loc. 1	30-Oct	9:19	Y	Numerous	1-5cm	N	-	-	Compound	Less Obvious Runoff Erosion
	Loc. 2	30-Oct	9:22	Y	4	1-10cm	N	-	-	Dome	Similar to Previous Observations
97NRT02	Loc. 1	30-Oct	9:51	Y	A few	1-5cm	N	-	-	Compound	Minor channels
	Loc. 2	30-Oct	9:54	N	-	-	N	-	-	Dome	
97NRT01	Loc. 1	30-Oct	9:42	Y	A few	1cm	N	-	-	Compound	
	Loc. 2	30-Oct	9:45	Y	2	2-5cm	N	-	-	Dome	
96NRT01	Loc. 1	30-Oct	9:27	N	-	-	N	-	-	Compound	
	Loc. 2	30-Oct	9:30	N	-	-	N	-	-	Dome	
94NRT02	Loc. 1	30-Oct	9:00	N	-	-	N	-	-	Dome	
	Loc. 1	30-Oct	8:56	N	-	-	N	-	-	Compound	
94RT01	Loc. 1	30-Oct	8:42	N	-	-	N	-	-	Compound	
	Loc. 1	30-Oct	8:35	N	-	-	N	-	-	Dome	



2020NRT01 - Loc.1



2020NRT01 - Loc.2



2008RT01 - Loc.1



2008RT01 - Loc.2



2002RT01 - Loc.1



2002RT01 - Loc.2



2000RT01 - Loc.1



2000RT01 - Loc.2



1998NRT02 - Loc.1



1998NRT02 - Loc.2



1998NRT01 - Loc.1



1998NRT01 - Loc.2



1997NRT02 - Loc.1



1997NRT02 - Loc.2



1997NRT01 - Loc.1



1997NRT01 - Loc.2



1996NRT01 - Loc.1



1996NRT01 - Loc.2



1994NRT02 - Loc.1



1994NRT01 - Loc.1



1994RT01 - Loc.1



1992RS01 / 1994RS01 - Loc.1

APPENDIX AA

2020 – 2021 Dangerous Goods Storage Inventory Records

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA

SUMMARY – Compliance with Requirements Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 and DG Licence

Storage Factor for each storage area 1000 or less?

Yes/ No

Details:

Is the current storage classed as minor storage?
(e.g. less than 250L flammable (petrol), 5,000L C1 & C2 (diesel and oil)
and ?250L manufactured product in any one storage area)?

Yes/ No

Details:

If no to both, is there a DG licence for the site? (There should be, or changes are required) Yes/No Details:

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA

SUMMARY – Compliance with Requirements Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 and DG Licence

Storage Factor for each storage area 1000 or less?

Yes/No

Details:

Is the current storage classed as minor storage?
(e.g., less than 250L flammable (petrol), 5,000L C1 & C2 (diesel and oil)
and 250L manufactured product in any one storage area)?

Yes/No

Details:

If no to both, is there a DG licence for the site? (There should be, or changes are required) Yes/No Details:

APPENDIX BB

ARPANSA Audit Report



Australian Government
**Australian Radiation Protection
and Nuclear Safety Agency**



Intractable Waste Disposal Facility, Mt Walton East

Technical Auditor's Report

A review of the actions undertaken by the proponent/operator from 2013 to 2018

Prepared by ARPANSA

Version 3 - 09 June 2021

R20/10995

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ARPANSA
619 Lower Plenty Road
YALLAMBIE VIC 3085
Tel: 1800 022 333 (Freecall) or +61 3 9433 2211

Email: info@arpansa.gov.au
Website: www.arpansa.gov.au

Document Revision History

Version	Date	Comments
1.0	06/02/20	First issue
2.0	15/03/21	Revised based on response from proponent/operator
3.0	09/06/21	Revised based on response from proponent/operator

Executive Summary

An Intractable Waste Disposal Facility (the Facility) was established, in 1992, by the West Australian Government at Mt Walton East. The site occupies 25 km² of Crown Reserve land within the shire of Coolgardie, approximately 475 km north east of Perth.

The site is used as a long-term disposal option for low-level radioactive, and intractable chemical wastes. Thirteen burial campaigns have been conducted at the site, three of these were for radiological wastes, seven were disposals of chemical wastes and in three instances, both chemical and radioactive wastes were disposed in the same cell, but were separated by an engineered barrier¹. However, regardless of the type of wastes, access to the disposal facility is only available if the waste was generated within West Australia and all other practicably available disposal, recycling and re-use options have been exhausted in order for the waste to be accepted into the Facility.

The first burial of radioactive waste at the site occurred in 1992 with later campaigns occurring in 1994, 2000, 2002 and 2008. The first two disposal campaigns used shaft disposal designs. The four subsequent campaigns used a trench design.

ARPANSA was appointed the role of 'technical auditor' for the Facility and asked to review the Facility against the requirements of the *Code of Practice for the near surface disposal of radioactive waste in Australia (1992)* (known as RHS 35). The results of this review are recorded in this document. This is the third review of the Facility performed by ARPANSA. Previous reviews were conducted in 2008 and 2013.

The audit performed in 2008 identified 10 non-compliances with RHS 35 and made 24 recommendations. The 2013 audit identified 5 non-compliances and made 16 recommendations. The current audit has identified 2 non-compliances and made 5 recommendations. Whilst it was not appropriate to review compliance against many aspects of the RHS 35 (as no disposals of radioactive waste² have occurred since 2008), it can be judged that the management of the Facility continues to improve. The recommendations are provided with the aim of encouraging improvement in certain areas.

¹ This methodology was approved by the Radiological Council of Western Australia prior to each disposal.

² As this audit does not include chemical waste, this report only addresses the disposals involving radioactive waste.

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1. Introduction

In 1992, the West Australian Government established a facility to deal with difficult to manage wastes. This facility is known as the 'Intractable Waste Disposal Facility, Mt. Walton East' (the Facility). This Facility is used for the disposal of intractable radiological and chemical wastes.

The proponent/operator for the Facility is the 'Department of Finance Building Management and Works' (Finance). Finance has requested that ARPANSA conduct a technical audit of the Facility. This report describes the audit that was conducted. This has considered the actions undertaken during the period from August 2013 to July 2018. Details of the audit timetable are provided in Appendix 1.

ARPANSA has previously conducted audits of the Facility in 2008 and 2013. This is the third technical audit that ARPANSA has conducted. Consequently, efforts have been made to make reference to the previous audits and identify improvements, where appropriate, that have occurred over the intervening period.

2. Method

This technical audit consisted of meetings with the IWDF Facility Management Contractor (FMC). Unfortunately, the proponent/operator (Finance) was unable to attend due to work scheduling difficulties and the Radiation Safety Officer was also unable to attend due to unforeseen circumstances. A site visit and a comparison of the Facility against the applicable code of practice for this type of facility were also conducted.

The Facility was compared against the requirements of the *Code of Practice for the disposal of radioactive waste in Australia* (1992) (known as RHS 35). In October 2018, RHS 35 was superseded by the *Code for Disposal Facilities for Solid Radioactive Waste* (2018) (RPS C-3). Although, this can be considered best practice in an Australian context, this was not used for this audit as compliance with RHS 35 is specified by the Facility Registration. It is, however, suggested that the requirements of RPS C-3 be reviewed, and where no direct contradiction to RHS 35 applies, the Facility should aim for compliance with RPS C-3 in the future.

The timetable for the Audit at Appendix 1 shows that the desk based assessment was undertaken with the FMC. The information obtained from the FMC was accepted as accurate. In many instances, RHS 35 requires documentation to be both prepared and transmitted to the Appropriate Authority. It is understood that this routinely occurs, however, due to the restricted timetable of the audit, it could not be verified that the Appropriate Authority has received these documents. In these instances, the audit included only the presence or absence of the documentation within the FMC records. Given the long-term nature of radioactive waste management, it is considered imperative that knowledge of the waste, and the safety arrangements for the waste, is maintained by all relevant parties. Hence, all parties are encouraged to work together so that the relevant records are maintained and available for the envisaged timeframe that the waste in the Facility remains hazardous to people and the environment.

2.1 Site visit

The review of plans, documents and reports related to the Facility can be performed in an office environment. However, some aspects of a technical audit are best performed at the site of the Facility. Consequently, a site visit of the Facility was conducted. The actions undertaken whilst on site are described in the sections below.

2.1.1 Burial sites

There are 13 burial sites at the Facility. However, as the Facility is for all intractable wastes (not just radioactive waste) only the sites containing radioactive waste were examined which are only those burial sites listed in Table 1.

Table 1: Radioactive waste burial cells at the Facility.

Type of cell ³	Name	Type of waste
Shaft	92RS01	Radioactive
Shaft	94RS01 ⁴	Radioactive
Trench	94RT01	Radioactive
Trench	2000RT01	Radioactive and chemical
Trench	2002RT01	Radioactive and chemical
Trench	2008RT01	Radioactive and chemical

In three instances, radioactive and chemical materials were placed in the same trench for disposal. It is recommended that the appropriateness of this practice be considered (particularly with regard to long-term safety) and documented in the safety assessment for the Facility. This is reflected in Recommendation R1.

2.1.2 Dose rate measurements

Whilst at the Facility, a gamma dose rate survey was conducted. This aimed to obtain suitable measurements to compare against the measurements that were taken during the surveys previously performed in 2008 and 2013. To achieve this, measurements were obtained using a dose rate meter in positions similar to those used in 2008 and 2013. The details of this survey are provided in

³ To date, disposals have occurred via both 'shaft' and 'trench' based designs. However, both designs are referred to as disposal cells in this report.

⁴ The naming convention for the disposal cells was developed after waste was emplaced in the first two shafts. The adopted convention requires that the name of the disposal cell begin with the year the waste was placed in the cell. It has been recognised that the second shaft, previously known as 92RS01, was not consistent with this convention and that it should have been named 94RS01. Most of the disposal documentation refers to the second shaft as 94RS01 but the plaque showed it as 92RS01. This has now been corrected. The reason for the confusion is that both shafts were excavated in 1992 but waste was not placed into the second shaft until 1994.

Appendix 2. While there are some minor variations in the measured values, these are due to statistical variations in the process of measuring radiation. Hence, it can be concluded that, from the evidence available, the gamma dose rates at the surface of the Facility have not increased since the previous audits in 2008 and 2013. Furthermore, the dose rates are within the normal range for background radiation within Australia

The survey also aimed to identify any anomalously high gamma dose rates at areas other than the defined measurement points. None were identified. The dose rates measured were consistent with the values recorded at the defined measurement points.

2.1.3 Warning signage

A survey of the warning signage present at the Facility was conducted during the site visit. This verified that signage (such as that shown in Figure 1) was posted around the all disposal cells enclosures. The details of this survey are described in Appendix 3. The survey identified two very minor discrepancies. One warning sign was missing from the southern fence of 2000RT01. However, the operator was aware that this sign was missing and had a replacement at the site ready for installation on the day of the site visit in order to rectify the matter. The survey also identified that a sign was not present at the mid-point on the Eastern fence surrounding shafts 92RS01 and 94RS01. However, a sign was present further along the fence. Therefore, it was concluded that all warning signs were present and in reasonable condition.



Figure 1: Typical example of a warning sign posted on an enclosure.

2.1.4 Surface markers

The location of each disposal cell is marked on the ground surface adjacent to the fence surrounding the burial site. Each of the burial shafts/trenches, with the exception of the two shafts that were sunk in 1992, has their own marker located on the ground surface adjacent to the fence surrounding the burial site. A single marker is used for the two burial shafts. The surface markers are constructed of a metal plate attached to a small concrete plinth. The results of the survey of surface markers are shown in Appendix 4. From this, it can be concluded that all of these markers were in place and were legible. The author has compared the state of the surface markers in 2013 to now and has concluded that the rate of any degradation is slow. A recommendation was made in 2013 to monitor the markers. This activity is now included in a site visit checklist. Hence, this recommendation is considered to be closed.

2.1.5 Enclosure fences

Each of the burial sites, with the exception of the two shafts that were sunk in 1992, is individually enclosed by a fence topped with razor wire. The two shafts are contained within a single fenced enclosure. It was verified that no significant gaps in the fencing exist. However, whilst, all of the fences for the enclosures examined were continuous and intact, it was observed that some of the fences did not reach the ground. The fences appear to otherwise be sound and the operator/proponent routinely confirms this.

It was assumed that the fence was installed to deter human occupation and prevent an animal burrowing into the waste leading to the movement of contaminants. The site visit conducted as part of this audit did not observe any indication that this was occurring or likely to occur due to a significant animal population in the nearby vicinity. However, it is understood, that the fencing surrounding the most recent trench (2008RT001) was deliberately left slightly above ground level to allow the egress of small animals. Consequently, it is not clear what purpose/role the fences surrounding the cells play in the safety of the Facility. It is incumbent on the proponent/operator to assess all risks associated with the Facility, determine their preferred approach/methodology of addressing/optimising the management of those risks. Hence, it is recommended that the role of the fence, and the relative importance of the fence, in the protection of workers, the public and the environment be considered and documented.



Figure 2: Example of a fence surrounding one of the enclosures that does meet not the ground.

2.1.6 Damage to the Facility

Each of the burial cells were examined for damage due to flora, fauna, subsidence, weathering effects (wind and rainfall) and deliberate human intrusion. The results of this assessment are shown in Appendix 5. It was verified that significant damage was not being done by any of these factors.

Some very small flora was observed in trenches 2002RT01 and 2008RT01. There was no evidence of fauna accessing the compound (e.g. tunnelling into waste). However, some droppings (scat) was observed in the V channel adjacent to 2008RT01. Negligible weathering effects were observed in 94RT01, 2000RT01 and 2008RT01. However, this did not appear to be having a significant impact upon the performance of the surface capping.

The fence lines surrounding each of the compounds were intact and complete. Minor damage was observed at two points in the fence line surrounding 2002RT01. However, these had been repaired. The auditor was unable to identify when the damage had occurred or even conclusively state that the damage identified was due to human intrusion (it may have been caused by another agent).

However, like the other observations above, it is recorded here as part of the verification of the state of the Facility and to also demonstrate that other, more serious, damage has not occurred.

3. Audit against the code of practice

The Facility was audited against the requirements set out in RHS 35. The details of the audit are provided in Appendix 6.

4. Results

This report describes an examination of the Facility's compliance with the requirements of RHS 35 and identified 2 non-compliances and has made 5 recommendations. Both the non-compliances and the recommendations have been compiled below.

This is an examination of compliance over the period from 2013 to 2018. Many of the requirements of RHS 35 relate to actions to be taken at the time of siting, design, and construction of a waste disposal facility or at the time of emplacement of waste within the Facility. It is acknowledged that the siting of the Facility occurred in the late 1980s and early 1990s and that the first disposal operation was conducted in 1992. Since then, further disposals at the Facility have been conducted in campaigns, on an as needs basis, dependent upon the volume of waste generated. The initial disposals used shafts, however, later disposals used trench designs. The type of cell used for a disposal campaign is dependent on the waste proposed for disposal and the waste packaging. Either shaft or trench remains an option for disposal cell selection at the IWDF and choice of cell design will depend on waste stream, waste packaging and quantity of waste requiring disposal at any one time. Large quantities of waste are disposed using trench design and small quantities may use shaft/borehole design. No disposal operations for radioactive waste have been conducted since 2008. As such, judgement of compliance with some of the requirements of RHS 35 has been considered to be not applicable as they have not occurred in the period from 2013 to 2018. However, many of these aspects should be considered and documented in the event that any future disposal campaigns should occur. This has been noted in Appendix 6 in the instances where it has been identified as appropriate.

The findings from the 2013 technical audit are provided at Appendix 7. This identified 5 non-compliances and made 16 recommendations for improvement. Three of the previous non-compliances have been closed (NC 2., NC 4. and NC 5.) and one of them has been maintained in a modified form (NC 1). However, one new non-compliance has been identified; This is NC 2. This relates to the absence of below ground markers⁵ this was previously identified as Recommendation 12.

⁵ It is acknowledged that in 2013, the issue of below ground markers was not identified as a non-compliance. No material change in the circumstances has occurred in the intervening period. However, in order to be internally consistent within this report, it was decided that attention should be drawn to those requirements where a substantial aspect of the requirement had not been achieved.

5. Non-compliances

- NC 1. Dose constraints shall be applied to the waste disposal system to ensure that individual dose limits are not exceeded. Such constraints shall apply where individuals may be exposed to other potential, or actual, sources of radiation, excluding natural background or medical sources (relates to paragraph 2.2 of RHS 35).⁶
- NC 2. Each disposal structure shall be accurately located and surveyed. Appropriate permanent surface and below-ground markers shall be put in place to define the boundaries and locations of disposal structures (relates to paragraph 3.1f.) of RHS 35).⁷

6. Recommendations

- R1. Consider and document, particularly with regard to long-term safety, the appropriateness of the emplacement of both chemical and radioactive waste in the same trenches.
- R2. Consider and document the role performed by the fencing around the disposal cells and identify the need to continue to monitor the condition and effectiveness of the fencing.
- R3. The previous safety assessment documents should be compiled, reviewed and revised to create the basis of a new safety assessment that is further developed to comply with current best practice in the field of near-surface radioactive waste disposal; taking into account modern best practices in radioactive waste management (e.g. IAEA SSG-23). Specifically, this should include:
- a.) The development of a post-closure safety assessment, using site specific data and scenarios, the results of which are integrated into the existing safety case (this relates to paragraph 2.3 of RHS 35).
 - b.) Re-assess possible post-closure exposure scenarios due to the Facility and consider the possibility of potential sources of exposure not considered when deriving the generic activity concentration limits given in RHS 35 (this relates to paragraph 2.6.3 of RHS 35). These should be used to assess potential doses due to the facility, which can subsequently be used to inform activity concentration limits for the Facility.
 - c.) Re-examine the limit (or lack thereof) on the total radionuclide activity for the disposal facility by performing a quantitative evaluation of exposures that might result from the analysis of scenarios during the post-closure phase (e.g. leaching and dispersal of radioactive contaminants by groundwater) (this relates to paragraph 2.6.4 of RHS 35).
 - d.) Review whether a dose constraint for members of the public should be applied. It is acknowledged that there is currently no public population

⁶ This only applies to a dose constraint for the public as a dose constraint has been implemented for workers.

⁷ This only applies to below-ground markers as surface markers are in place and disposal locations have been recorded.

nearby. However, should demographics change in the future it may be useful to have such a dose constraint in place (this relates to paragraph 2.2 of RHS 35).

- e.) Re-evaluate whether doses predicted due to post-closure exposure scenarios are acceptable at timeframes consistent with the current institutional control period (ICP) or whether the ICP needs to be reconsidered (this relates to paragraph 2.3 of RHS 35).
 - f.) Consider preparing documentation, if not already in existence, analysing the behaviour of the cement matrix with regard to:
 - (i) Its ability to maintain its structure under compressive loads and possible structural changes in the waste body; and
 - (ii) Its ability to comply with stability requirements and protect against inadvertent intrusion (this relates to paragraph 2.6.5 of RHS 35).
 - g.) Consider including an analysis of the engineered barriers in the waste body and the disposal facility and the role they play in achieving the safety objective in the post-closure safety assessment. This can be used to decide upon appropriate monitoring actions during operation and post-closure of the Facility (this relates to paragraph 3.1(c) of RHS 35).
 - h.) As part of the post-closure safety assessment, the design of the disposal trench is considered. Specifically, whether engineered drainage should be used for future disposal trenches (this relates to paragraph 3.1(h) of RHS 35).
 - i.) It is recommended that an assessment of possible exposure pathways be undertaken. This can result from a post-closure safety assessment and be used to decide upon appropriate monitoring actions during operation and post-closure of the Facility (this relates to paragraph 3.2.4 of RHS 35).
- R4. Consideration of whether appropriate below-ground warning markers should be put in place to help prevent inadvertent access to the waste forms (this relates to paragraph 3.1f) of RHS 35).
- R5. Consider putting further effort into the database recording details of the radioactive materials disposed at the site. The database should aim to be complete and an authoritative record of disposal campaigns. It could explicitly include the category of radioactive waste (i.e. A, B or C) for each drum (this relates to paragraph 4.6.1(a) of RHS 35).

7. Conclusions

This is the third technical audit of the Facility that ARPANSA has conducted (the previous audits were in 2008 and 2013). Consequently, efforts have been made in this report to make reference to the previous audits and identify improvements, where appropriate, that have occurred over the intervening period.

Although some non-compliances have been identified, and recommendations have been made, it appears that there have been improvements since the last audit. It is noted that many of the areas identified for improvement relate to the post-closure safety assessment and safety case. Consequently, these have been grouped together as Recommendation R3. Furthermore, it is reiterated that the requirements of RPS C-3 should be considered best practice in the Australian context, and although this was not used for this audit, it is suggested that the requirements of RPS C-3 be reviewed, and where no direct contradiction to RHS 35 applies, the Facility should aim for compliance with RPS C-3 in the future.

Appendix 1: Audit timetable

22 October 2018

The author, Andrew McCormick, met with a member of the Intractable Waste Disposal Facility (IWDF) Facility Management Contractor (FMC) in Perth and performed a desk-based assessment of the Facility.

23 October 2018

The author travelled to the Facility and conducted the site inspection.

24 October 2018

The author met with a member of the IWDF FMC in Perth and continued a desk-based assessment of the Facility.

Appendix 2: Radiation survey

Table A2-1: Radioactive waste shafts 92RS01 & 94RS01 (enclosed elongated E-W).

Location	Dose rate ($\mu\text{Sv/h}$) measured one metre above ground level		
	2008	2013	2018
Mid-point of Southern fence	< 0.1	<0.1	0.08
South-West corner	< 0.1	<0.1	0.09
Mid-point Western fence	-	<0.1	0.08
North-West corner	< 0.1	<0.1	0.09
Mid-point of Northern fence	< 0.1	<0.1	0.08
North-East corner	< 0.1	0.1-0.15	0.08
Mid-point of Eastern fence	< 0.1	0.15-0.2	0.09
South-East corner	-	<0.1	0.09
Over shaft; southern	0.15-0.2	<0.1	0.16
Over shaft; northern	0.1	<0.1	0.16

Table A2-2: Radioactive waste trench 94RT01 (elongated E-W).

Location	Dose rate ($\mu\text{Sv/h}$) measured one metre above ground level		
	2008	2013	2018
Mid-point of Southern fence	0.1	<0.1	0.08
South-West corner	< 0.1	<0.1	-
Mid-point Western fence	-	<0.1	0.08
North-West corner	< 0.1	0.15-0.2	0.17
Mid-point of Northern fence	< 0.1	0.1-0.2	0.10
North-East corner	< 0.1	0.1-0.2	0.09
Mid-point of Eastern fence	-	0.1-0.2	0.09
South-East corner	0.1-0.15	0.1-0.15	0.09
Over trench; western end	-	<0.1	0.06
Over trench; mid-point	-	-	0.06
Over trench; eastern end	-	-	0.06

Table A2-3: Radioactive and chemical waste trench 2000RT01 (elongated N-S).

Location	Dose rate ($\mu\text{Sv/h}$) measured one metre above ground level		
	2008	2013	2018
Mid-point of Southern fence	-	< 0.1	0.12
South-West corner	< 0.1	0.15-0.25	0.16
South-Western fence	-	-	0.15
Mid-point Western fence	≤ 0.1	0.1-0.15	0.14
North-Western fence	-	-	0.15
North-West corner	< 0.1	< 0.1	0.15
Mid-point of Northern fence	-	< 0.1	0.16
North-East corner	< 0.1	0.1-0.15	0.18
North-Eastern fence	-	-	0.22
Mid-point of Eastern fence	< 0.15	< 0.1	0.18
South-Eastern fence	-	-	0.16
South-East corner	0.15-0.2	0.15-0.2	0.12
Over trench; southern end	-	< 0.1	0.16
Over trench; mid-point	-	< 0.1	0.16
Over trench; northern end	-	0.1-0.15	0.16

Table A2-4: Radioactive and chemical waste trench 2002RT01 (elongated N-S).

Location	Dose rate ($\mu\text{Sv/h}$) measured one metre above ground level		
	2008	2013	2018
Mid-point of Southern fence	< 0.15	0.1-0.3	0.17
South-West corner	< 0.15	<0.1	0.17
South-Western fence	-	-	0.18
Mid-point Western fence	< 0.1	0.3-0.4	0.18
North-Western fence	-	-	0.18
North-West corner	< 0.1	<0.1	0.18
Mid-point of Northern fence	-	0.1-0.2	0.18
North-East corner	<0.1	0.1-0.15	0.19
North-Eastern fence	-	-	0.18
Mid-point of Eastern fence	0.1-0.25	<0.1	0.17
South-Eastern fence	-	-	0.17
South-East corner	< 0.1	<0.1	0.17
Over trench; southern end	-	0.1-0.2	0.18
Over trench; mid-point	-	<0.1	0.17
Over trench; northern end	-	0.2-0.25	0.17

Table A2-5: Radioactive and chemical waste trench 2008RT01 (elongated N-S).

Location	Dose rate (µSv/h) measured one metre above ground level		
	2008	2013	2018
Mid-point of Southern fence	Not conducted ⁸	<0.1	0.16
South-West corner	Not conducted	<0.1	0.22
South-Western fence	-	-	0.2
Mid-point Western fence	Not conducted	0.1-0.25	0.18
North-Western fence	-	-	0.17
North-West corner	Not conducted	0.1-0.15	0.15
Mid-point of Northern fence	Not conducted	<0.1	0.16
North-East corner	Not conducted	<0.1	0.16
North-Eastern fence	-	-	0.16
Mid-point of Eastern fence	Not conducted	<0.1	0.12
South-Eastern fence	-	-	0.17
South-East corner	Not conducted	<0.1	0.18
Over trench; southern end	-	0.1-0.2	0.14
Over trench; mid-point	-	0.1-0.2	0.14
Over trench; northern end	-	0.1-0.2	0.14

Note: All of the above dose rates are inclusive of background radiation. In 2018, this was measured to be 0.05 µSv/h. This was measured at a point away from any of the disposal cells, and the site office, in an effort to best represent the undisturbed natural background in the local environment. In order to provide a consistent approach to these radiation surveys the same make and model survey meter has been used in both 2013 and 2018. This was a Polimaster PM1401K. As mentioned in section 2.1.2, slight variations in the measured dose rate, at the same location, from one survey to another occurs due to the statistical nature of measuring radiation. This is particularly true when measuring very low levels of radiation. Hence, these slight variations should not raise concerns as no discernible change in the performance of the Facility has been observed.

⁸ A radiation measurement of the 2008RT01 trench was not obtained as part of the 2008 technical audit as the site visit that was conducted as part of the audit was held at the same time as waste emplacement was occurring. As such, the trench had not been completely filled and capped.

Appendix 3: Survey of warning signage

Table A7-6: Radioactive waste shafts 92RS01 & 94RS01 (enclosed elongated E-W).

Location	Warning signage present and in reasonable condition		
	2008	2013	2018
Mid-point of Southern fence	Yes	Yes	Yes
Mid-point Western fence	Yes	Yes	Yes
Mid-point of Northern fence	Yes	Yes	Yes
Mid-point of Eastern fence	Yes	No	No ⁹
South-East corner	-	Yes	Yes

Table A7-7: Radioactive waste trench 94RT01 (elongated E-W).

Location	Warning signage present and in reasonable condition		
	2008	2013	2018
Mid-point of Southern fence	Yes	Yes	Yes
Mid-point Western fence	Yes	Yes	Yes
Mid-point of Northern fence	Yes	Yes	Yes
Mid-point of Eastern fence	Yes	Yes	Yes

Table A7-8: Radioactive and chemical waste trench 2000RT01 (elongated N-S).

Location	Warning signage present and in reasonable condition		
	2008	2013	2018
Mid-point of Southern fence	Yes	Yes	No ¹⁰
Mid-point Western fence	Yes	Yes	Yes
Mid-point of Northern fence	Yes	Yes	Yes
Mid-point of Eastern fence	Yes	Yes	Yes

⁹ The warning sign was not at the mid-point of the Eastern fence it was located further along the fence. It was concluded that the warning sign was still performing its function.

¹⁰ The operator was aware that this sign was missing and had a replacement at the site ready for installation on the day of the site visit.

Table A7-9: Radioactive and chemical waste trench 2002RT01 (elongated N-S).

Location	Warning signage present and in reasonable condition		
	2008	2013	2018
Mid-point of Southern fence	Yes	Yes	Yes
Mid-point Western fence	Yes	Yes	Yes
Mid-point of Northern fence	Yes	Yes	Yes
Mid-point of Eastern fence	Yes	Yes	Yes

Table A7-10: Radioactive and chemical waste trench 2008RT01 (elongated N-S).

Location	Warning signage present and in reasonable condition		
	2008	2013	2018
Mid-point of Southern fence	Not conducted ¹¹	Yes	Yes
Mid-point Western fence	Not conducted	Yes	Yes
Mid-point of Northern fence	Not conducted	Yes	Yes
Mid-point of Eastern fence	Not conducted	Yes	Yes

¹¹ A survey of the warning signage around the 2008RT01 trench was not obtained as part of the 2008 technical audit as the site visit, that was conducted as part of the audit, was held at the same time as waste emplacement was occurring.

Appendix 4: Survey of surface markers



Image A4-1: Photograph of surface marker for disposal shafts 92RS01 and 94RS01¹².



Image A4-2: Photograph of surface marker for disposal trench 94RT01.

¹² See footnote 1 regarding change of name to reflect year of waste emplacement.



Image A4-3: Photograph of surface marker for disposal trench 2000RT01.



Image A4-4: Photograph of surface marker for disposal trench 2002RT01.



Image A4-5: Photograph of surface marker for disposal trench 2008RT01.

Appendix 5: Assessment of damage to the Facility

Table A5-1: Assessment of impact upon the disposal trenches/shafts made by various factors.

Name	Signs of impact due to				
	Flora	Fauna	Subsidence	Weathering effects	Deliberate human intrusion
92RS01	No	No	No	No	No
94RS01	No	No	No	No	No
94RT01	No	No	No	Negligible	No
2000RT01	No	No	No	Negligible	No
2002RT01	Some very small plants	No	No	No	Repairs have been made to minor fence damage in 2 places
2008RT01	A very small plant	No evidence within the compound but some droppings (scat) in the adjacent runoff channel	No	Negligible	No

Appendix 6: Assessment of the Facility against RHS 35

No.	Criterion	Response	Conclusion
2	Criteria for Waste management		
2.2	Radiation protection considerations		
	<p>Radiation protection considerations shall be the basis for the establishment of waste acceptance criteria to achieve the objective in Section 2.1.</p>	<p>Waste Acceptance Criteria (WAC) have been established for the facility. These are outlined in <i>Waste Acceptance Guidelines And Waste Acceptance Proforma</i> (October 2017, Revision 13). This document ‘details the properties and characteristics that deem wastes unsuitable for disposal at the IWDF’.</p> <p>It is considered that the radiation protection considerations associated with a WAC should contribute towards the isolation of the waste from the biosphere in order to ensure that no unacceptable health risk to humans or the environment occurs. In this instance, this is done by prohibiting liquids, explosive materials, highly flammable materials, highly reactive materials, gases, materials that decompose and Category S radioactive material. Waste must be packaged in accordance with the Facility’s packaging requirements. The maximum activity that can be packaged in a drum is provided for some nuclides. Data for other nuclides can be added as required.</p> <p>Two other criteria have been used to define waste that is unsuitable for disposal at the facility. These are that there shall not be ‘...alternative, readily available, and practicable, reuse, recycling, treatment, destruction or disposal options in Australia’ for the waste and that the facility will not accept waste generated outside Western Australia. These last two criteria are due more to ideological rather than radiological considerations. However, it is the prerogative of the</p>	<p>Compliant</p> <p>R3. The previous safety assessment documents should be compiled, reviewed and revised to create the basis of a new safety assessment that is further developed to comply with current best practice in the field of near-surface radioactive waste disposal; taking into account modern best practices in radioactive waste management (e.g. IAEA SSG-23). Specifically, this should include:</p> <p>a.) The development of a post-closure safety assessment, using site</p>

No.	Criterion	Response	Conclusion
		<p>operator to enforce these criteria and, as they do not undermine radiation protection principles, this is considered to be outside the scope of this audit.</p> <p>The previous audit commented that the ‘generally adopted method of disposal’ appeared to limit the maximum radioactivity in each drum to the values given for Category B waste in RHS 35. Those values were established for an arid remote site. While it was previously acknowledged that the site largely aligns with this description, it was recommended that the proponent/operator, as part of the development of the safety case and safety assessment for the Facility, re-assesses possible exposure scenarios due to the Facility and considers the possibility of potential sources of exposure not considered when deriving the generic activity concentration limits given in RHS 35. Since the previous audit, possible exposure scenarios that could occur during the operation of the facility have been assessed and an operational safety assessment and safety case has been developed. However, the documentation describing the safety of the facility post-closure has not yet been revised in accordance with modern standards. Hence, it is recommended that the post-closure safety case be revised based upon a suitable safety assessment using possible exposure scenarios. This is encapsulated in Recommendation R3. Several other recommendations related to the post-closure safety assessment are made throughout this report. For the reader’s convenience, these have been grouped together as part of Recommendation R3. However, efforts have been made to cross-reference the requirement of RHS 35 that the recommendation relates to.</p>	<p>specific data and scenarios, the results of which are integrated into the existing safety case (this relates to paragraph 2.3 of RHS 35).</p> <p>b.) Re-assess possible post-closure exposure scenarios due to the Facility and consider the possibility of potential sources of exposure not considered when deriving the generic activity concentration limits given in RHS 35 (this relates to paragraph 2.6.3 of RHS 35). These should be used to assess potential doses due to the facility, which can subsequently be used to inform activity concentration limits for the Facility.</p>

No.	Criterion	Response	Conclusion
			<p>c.) Re-examine the limit (or lack thereof) on the total radionuclide activity for the disposal facility by performing a quantitative evaluation of exposures that might result from the analysis of scenarios during the post-closure phase (e.g. leaching and dispersal of radioactive contaminants by groundwater) (this relates to paragraph 2.6.4 of RHS 35).</p> <p>d.) Review whether a dose constraint for members of the public should be applied. It is acknowledged that there is currently no public population nearby. However, should demographics change in the future it may be useful to have</p>

No.	Criterion	Response	Conclusion
			<p>such a dose constraint in place (this relates to paragraph 2.2 of RHS 35).</p> <p>e.) Re-evaluate whether doses predicted due to post-closure exposure scenarios are acceptable at timeframes consistent with the current ICP or whether the ICP needs to be reconsidered (this relates to paragraph 2.3 of RHS 35).</p> <p>f.) Prepare documentation, if not already in existence, analysing the behaviour of the cement matrix with regard to:</p> <p style="padding-left: 40px;">(i) Its ability to maintain its structure under</p>

No.	Criterion	Response	Conclusion
			<p>compressive loads and possible structural changes in the waste body; and</p> <p>(ii) Its ability to comply with stability requirements and protect against inadvertent intrusion (this relates to paragraph 2.6.5 of RHS 35).</p> <p>g.) The post-closure safety assessment should include an analysis of the engineered barriers in the waste body and the disposal facility and the role they play in achieving the objective</p>

No.	Criterion	Response	Conclusion
			<p>outlined in section 2.1 of RHS 35. This can be used to decide upon appropriate monitoring actions during operation and post-closure of the facility (this relates to paragraph 3.1(c) of RHS 35).</p> <p>h.) As part of the post-closure safety assessment, the design of the disposal trench is considered. Specifically, whether engineered drainage should be used for future disposal trenches (this relates to paragraph 3.1(h) of RHS 35).</p> <p>i.) It is recommended that an assessment of possible exposure pathways be undertaken. This can</p>

No.	Criterion	Response	Conclusion
			<p>result from a post-closure safety assessment and be used to decide upon appropriate monitoring actions during operation and post-closure of the facility (this relates to paragraph 3.2.4 of RHS 35).</p>
	<p>The characteristics of the site chosen for the disposal facility and the design of facilities for waste treatment, packaging or conditioning for disposal shall ensure that the following system of radiation protection is adhered to. The system is recommended by the International Commission on Radiological Protection and has been adopted by the National Health and Medical Research Council.</p>	<p>The process for siting the Facility occurred over 25 years ago. No disposals have occurred since 2008 and no facilities for waste treatment, packaging or conditioning are present on site. Therefore, this requirement has been assessed as not applicable.</p>	<p>Not applicable</p>
	<p>(a) No practice involving exposures to radiation should</p>		

No.	Criterion	Response	Conclusion
	<p>be adopted unless it produces sufficient benefit to the exposed individuals or to society to offset the radiological detriment it causes (justification).</p>		
	<p>(b) The magnitude of individual radiation exposures, the number of people exposed and the likelihood of incurring the exposures where these are not certain to be received shall be kept as low as reasonably achievable (ALARA), economic and social factors being taken into account (optimisation).</p>		
	<p>(c) The exposure of individuals resulting from the combination of all the relevant practices should be subject to dose limits or to some control of risk in the case of potential exposures</p>		

No.	Criterion	Response	Conclusion
	(individual dose and risk limits).		
	<p>The objective outlined in Section 2.1 shall be achieved by the use of the annual radiation dose limits recommended by the NHMRC for the following individuals:</p> <p>(a) personnel employed at the disposal facility or personnel involved with operations for the treatment, packaging or conditioning of waste or in the transport of waste to the facility; and</p> <p>(b) any member of the public who might be exposed as a result of inadvertent intrusion or environmental dispersal of radioactivity from the site during operations, or during or after the institutional control period.</p>	<p>No disposal operations have been conducted since 2008. No waste is stored at the facility and no packaging or treatment is conducted outside of a disposal campaign. Furthermore, no staff are employed at the facility in-between campaigns.</p> <p>Arrangements are in place for the protection of workers for any future disposal campaigns. This is contained within <i>Radiation Management Procedure RPO1</i> (revision 10). This document stipulates that all personnel who may potentially be exposed to radioactive material must wear an electronic personal dosimeter (EPD).</p> <p>Since the last audit, it is estimated that approximately eight people have visited the site. This includes the management responsible for the Facility and the Community Liaison Committee (as a meeting was held on site). None of the above have worn personal dosimetry while visiting the Facility. The conservative approach often uses personal dosimetry as a means of demonstrating that the individual was exposed to a negligible level of radiation. In this instance, the external ambient radiation measured above the disposal shafts and trenches is very low (within the normal range for background radiation in Australia). Radon and Thoron monitoring was conducted over the course of 12 months in 2014-2015. The measured values are broadly consistent with those that have been conducted previously and are very low compared to the derived reference level of 1000 Bq/m³ (averaged over a year). It can be concluded from the above that in the period since the last audit, doses to personnel involved with the Facility (i.e. workers) have been well below the annual radiation limits.</p>	Compliant

No.	Criterion	Response	Conclusion
		<p>The disposal shafts and trenches are individually enclosed (fenced) and display warning signage. Hence, it is unforeseeable that, in the near-term, a member of the public might inadvertently be exposed. Dispersal of radioactivity within the environment during operations is considered to be irrelevant (as no operations have been conducted since 2008) and the Facility is still operational and the ICP has not commenced. Hence, it is concluded that the Facility complies with this requirement.</p>	
	<p>Dose constraints shall be applied to the waste disposal system to ensure that individual dose limits are not exceeded. Such constraints shall apply where individuals may be exposed to other potential, or actual, sources of radiation, excluding natural background or medical sources.</p>	<p>Dose constraints are an important and useful tool in the management of doses from a radioactive waste disposal facility. Constraints can, and should, be applied in the protection of both the public and radiation workers. The adoption of a dose constraint for the public can be used in the siting, design and construction of the facility, the Waste Acceptance Criteria and the waste packages themselves. A dose constraint for workers can be used in the transport, handling and emplacement of the waste within the facility.</p> <p>The 2008 audit concluded that the Facility was non-compliant with this requirement and made a series of recommendations. The 2013 audit considered the proponent/operator's response and concluded that the documentation has been amended to include dose constraints. However, there was concern that the implementation may not have fulfilled the spirit of the requirement which is to ensure that dose limits are not exceeded. Hence, it was recommended that the concept of dose constraints be reconsidered from a philosophical perspective and,</p>	<p>Non-compliant¹³ (NC 1.)</p> <p>Refer to Recommendation R3d.</p>

¹³ This only applies to a dose constraint for the public as a dose constraint has been implemented for workers.

No.	Criterion	Response	Conclusion
		<p>on a more practical level, that a review of the history of doses incurred by workers due to the Facility be performed and used as the basis to set a numerical dose constraint that (a) can help ensure that individual dose limits are not exceeded, and (b) assist in the optimisation process.</p> <p>A copy of <i>Radiation Instruction: Occupational Radiation Monitoring</i> (Instruction RI-02) was provided. This document stipulates dose constraints for workers at the Facility. A dose constraint of 5 mSv per year has been applied to normal circumstances and 10 mSv per year applied to accident scenarios.</p> <p>The current audit has, however, observed that no dose constraint has been set for the public. Therefore, it is concluded that the Facility is non-compliant with this requirement. In isolation, this is considered as somewhat of a moot point given that no disposals have occurred since 2008. This would, however, change if any future disposals were planned as the dose constraint would be an important consideration in assessing the adequacy of the design and construction of the facility against the predicted future behaviour of radioactivity within the Facility. Furthermore, an expansion of the current safety assessment and safety case for the Facility to include aspects beyond operation (waste handling and emplacement) could use a dose constraint for the public to demonstrate that an acceptable degree of safety will be maintained over the life of the facility and the ICP.</p>	
2.3	Performance requirements and safety assessment		
	To show that this performance requirement will be achieved by	The 2008 audit considered the Facility to be non-compliant with this requirement. However, it is unclear whether that audit was aware of the risk assessments that	Compliant

No.	Criterion	Response	Conclusion
	<p>the proposed waste disposal facility, the proponent shall submit to the appropriate authority a detailed analysis of the design and operation of the facility, and an assessment of the projected long-term integrity of the site after closure.</p>	<p>had previously been performed prior to the operation of the Facility. These were <i>Comparative Radiological Risk Assessment for Gangue Disposal Options</i> and the <i>Risk Assessment for Radioactive Waste Disposal at Mt Walton</i>. The 2013 audit was aware of the above risk assessments, and as such, concluded that the Facility was compliant with this requirement, but in order to encourage improvement, and adoption of modern standards, made the following recommendations:</p> <ul style="list-style-type: none"> a.) <i>the records of any past safety assessment be collected and compiled to create the basis of a new safety assessment that is further developed to comply with current best practice in the field of near-surface radioactive waste disposal;</i> 	<p>Refer to Recommendation R3.</p>
	<p>A safety assessment shall also be undertaken by the proponent, and be subject to independent technical audit. This assessment shall identify those pathways through which radionuclides could be released to the general environment during the operation of the facility or after its closure. The assessment shall also include a quantitative treatment of realistic scenarios which could lead to exposure through inadvertent intrusion at the site after institutional control has ceased.</p>	<ul style="list-style-type: none"> b.) <i>the institutional control period be established [or re-evaluated] by undertaking a safety assessment process as recommended in section 2.3 of RHS 35;</i> c.) <i>the activity concentration limits suitable for the operation of the Mt Walton East facility be determined through a safety assessment process;</i> <p>The proponent/operator has prepared an ‘operational’ safety case. This contains the statement that ‘a Post-Closure Safety Case (PCSC) will be produced separately to demonstrate that the Facility will remain ‘passively safe’ after the site is closed and the institutional controls are removed’. This post-closure safety case is needed to demonstrate the projected long-term integrity of the site as specified in this requirement. Hence, as per the 2013 audit, it is acknowledged that the abovementioned risk assessments do exist. However, the previous recommendations relating to the performance of a safety assessment and preparation of a safety case, specifically in regard to post-closure safety of the</p>	

No.	Criterion	Response	Conclusion
	The assumption of any probability of less than unity, which may subsequently be used to establish quantitative criteria for a specific disposal facility, shall be justified in the safety assessment.	facility, in accordance with modern standards remains. This is encapsulated in Recommendation R3.	
2.4	Site requirements and selection criteria		
2.4.1	General site characteristics		
	The best practicable technology consistent with ALARA shall be incorporated into the design of structures to enhance the confinement of waste, especially where these characteristics are less favourable than desired. A surrounding area of restricted development with characteristics that further augment the safety of the site shall be provided.	<p>This is considered to be not applicable as no disposal campaigns have been conducted since 2008. However, whilst it is unclear if any optimisation studies reviewing best practicable technology that were conducted during the design of the most recent disposal trench (2008RT01) many good practices have been identified in the design used. For instance, the waste was cemented into 60 L drums which were then concreted inside 200 L drums with sand used to backfill around the drums after they were placed into position. Furthermore, a cover of no less than 5 metres thickness topped with a water shedding clay dome was used.</p> <p>The only exception to the above comments on good practices is the co-disposal/mixed burials of radioactive waste with non-radioactive wastes. It is recommended that this issue be considered as part of the development of a revised post-closure safety assessment.</p> <p>The proponent/operator identified that, given the nature of the location of the Facility, it was unlikely that permanent public occupancy would be considered.</p>	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.



No.	Criterion	Response	Conclusion
		<p>However, it was identified that mining in the area is very likely. To address this, a 'File Notation Area' (FNA) has been added to the WA Department of Mines and Petroleum Tengraph database to ensure that the proponent is notified of all intended exploration and mining activity within the FNA. This, in conjunction with the massive size of the facility, is expected to achieve the requirement given in RHS 35, to have a surrounding area of restricted development with characteristics to augment the safety of the site. This can be confirmed in the analysis performed as part of a revised post-closure safety assessment.</p>	
2.4.2	Site selection criteria		
	<p>To be suitable for near-surface disposal of radioactive waste, the site chosen for the facility shall have characteristics that will facilitate its long-term stability and provide adequate isolation of the waste so that the objective in Section 2.1 is achieved.</p>	<p>Not applicable as the process for siting the Facility occurred over 25 years ago. However, it is acknowledged that the site is located in a remote, semi-arid environment.</p>	<p>Not applicable</p>
2.4.3	Public consultation		
	<p>Site selection shall include a suitable consultative process to establish public consent to the</p>	<p>Not applicable as the process for siting the Facility occurred over 25 years ago.</p>	<p>Not applicable</p>

No.	Criterion	Response	Conclusion
	location of a disposal facility at the particular site.		
2.5	Waste classification		
	Radioactive waste, suitable for near-surface land disposal, shall be separated into three categories: Category A, Category B and Category C.	This is considered to be not applicable as no disposal campaigns have occurred since 2008. However, it is noted that the submission to the Radiological Council seeking approval for the 2008 co-disposal campaign indicates that ‘the proposed disposal method is as per the Code of Practice...with the waste classified as category B’. This demonstrates that in the past waste has been categorised in accordance with the categories identified in RHS 35.	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.
	Radioactive waste which does not meet quantitative and qualitative criteria in this code shall not be approved by the appropriate authority as suitable for near-surface disposal. Therefore a fourth category, Category S, shall be designated... Waste within Category S shall be unacceptable for near-surface disposal and shall be retained in storage until an alternative disposal method is available.	<p>This is considered to be not applicable as no disposal campaigns have occurred since 2008. However, as previously discussed in section 2.2, the <i>Waste Acceptance Guidelines And Waste Acceptance Proforma</i> (October 2017, Revision 13) outlines the WAC for the facility. This document provides the framework for waste producers to demonstrate that their waste meets the necessary criteria to gain entry into the Facility. This document describes features of waste that automatically makes them unsuitable. Amongst these criteria is Category S radioactive material. Hence, Category S radioactive material is not acceptable for disposal at the Facility. Therefore, there is confidence that the Facility has arrangements for managing this requirement in the future.</p> <p>The details of the radioactive material that has been disposed within the Facility is documented in a database. Although this database is still under development, it</p>	<p>Not applicable</p> <p>Refer to Recommendation R5.</p>

No.	Criterion	Response	Conclusion
		<p>records the nuclide and activity of each of the sources within each drum and the total activity within each drum. However, it does not record the category of radioactive waste (i.e. A, B or C), or alternatively, demonstrate through calculation that the contents of the drum meet that claimed category. It is recommended that these aspects be included in the future development of the database (refer to Recommendation R5.).</p>	
	<p>Quantitative criteria in terms of activity concentration limits for specific radionuclides shall be derived for each category of radioactive waste for each facility in accordance with the principles outlined in Section 2.6.3 of this code.</p>	<p>The 2013 audit acknowledged the report detailing the <i>Risk Assessment for Radioactive Waste Disposal at Mt Walton</i> prepared in 1992 derived facility-specific activity concentration values for a number of nuclides. These were C-14, Th-232, Am-241, Cs-137 and Sr-90. These five nuclides are present on a list given in the same report summarising the radionuclides requiring controlled disposal. On the basis of this, that audit concluded that the Facility was compliant with this requirement. However, that audit recommended that <i>'as part of the safety assessment, review the derivation of the activity concentration limits for specific radionuclides in accordance with section 2.6.3 of RHS 35'</i>. The proponent/operator's response to that audit argued that the Risk Assessment performed in 1992 found an absolute lack of groundwater, and that hence, there was no credible radiological basis to establish a maximum total site activity limit. The current audit is cautious of this approach as it may not represent suitably conservative analysis. Although the boreholes at the site have been routinely monitored for groundwater and failed to find any, it is not considered appropriately conservative to conclude that the site has no groundwater and will have no groundwater in the future (for a period of hundred(s) of years).</p> <p>The Proponent has prepared an operational safety case but not a post-closure safety case. Based upon the previous risk assessment, it is concluded that the Facility is compliant with this requirement. However, it is recommended that, as part of the development of the post-closure safety assessment for the Facility, an</p>	<p>Compliant</p> <p>Refer to Recommendation R3.</p>

No.	Criterion	Response	Conclusion
		<p>approach towards the derivation of quantitative activity concentration limits for specific radionuclides be made in accordance with section 2.6.3 of RHS 35. This should acknowledge the data that has been measured and is known and estimate the uncertainties associated with the information that is not known. This is encapsulated in Recommendation R3.</p>	
2.6	Specific criteria and requirements for waste acceptance and disposal		
	<p>Exposure of individuals resulting from waste acceptance and disposal shall be subject to dose limits recommended by the NHMRC.</p> <p>If other potential sources of exposure exist, dose constraints shall be established to ensure that the dose to a member of the public from all sources, excluding natural background radiation and medical exposure, does not exceed the specified limit.</p>	<p>Throughout the history of the facility, disposal campaigns have been conducted sporadically when needed. When a campaign is conducted, sources are accepted and packaged for transport to the site and for disposal. The Facility does not regularly, and routinely, accept sources for disposal and does not store sources in anticipation of the next disposal. It is important to understand the nature of these operations as it explains why things are done the way they are done.</p> <p>During a disposal campaign it is anticipated that personnel will be exposed to some radiation during the process of accepting, packaging and conditioning, transporting, and disposing of the waste. The protection of workers whilst they undertake these activities is discussed in section 2.6.1 below. However, it is observed that due to the transient nature of the pre-disposal and disposal operations there is little to no opportunity for exposure to workers outside of these disposal campaigns. As previously mentioned, no disposal campaigns have been conducted since 2008.</p> <p>Any exposure of the public to radiation as a consequence of the Facility is almost entirely dependent upon the Facility successfully isolating the waste. The</p>	<p>Compliance is judged below</p>

No.	Criterion	Response	Conclusion
		protection of the public under these circumstances is discussed in section 2.6.1 below.	
2.6.1	Radiation Protection Criteria		
	<p>The annual effective dose for exposure of members of the public shall not exceed the value recommended by the NHMRC. This is currently 1 mSv. This limit shall be the basis for the development of quantitative criteria for the acceptance of waste for disposal. If a dose constraint is established to take into account other potential exposures, the lower value shall be used to calculate activity concentration limits for each category of waste.</p>	<p>The methodology used by <i>Risk Assessment for Radioactive Waste Disposal at Mt Walton</i> performed in 1992 used a radiation protection criterion of 1 mSv/year for a member of the public in assessing site specific activity concentration limits. This analysis identified that, for some nuclides, the generic activity concentration limits were overly conservative, while conversely, an even more conservative activity concentration limit for Am-241 than is provided by RHS 35 was needed.</p> <p>The abovementioned document also considered whether a dose constraint for members of the public should be applied to account for other exposures. This document concluded that an effective dose limit of 1 mSv was appropriate and that there was no need to apply a lower dose constraint. The matters was considered as part of the 2013 audit. A summary of this, and the current assessment, is provided at Section 2.2 of this Table.</p>	<p>Compliant</p> <p>Refer to Recommendation R3d.)</p>
	<p>Radiation protection standards for those personnel who work at the disposal facility shall be in accord with the recommendations of the NHMRC on occupational exposure.</p>	<p>In the Australian context, dose limits are prescribed in the <i>Code of Radiation Protection in Planned Exposure Situations 2016</i> (RPS C-1). This is the replacement for the 1991 interim recommendations. RI-02 Occupational Radiation Monitoring (Revision 10) was received as part of this audit. This provides the dose limits</p>	<p>Compliant</p>



No.	Criterion	Response	Conclusion
	The 1991 interim recommendations specify a limit on the annual effective dose of 20 mSv, averaged over five years, with no more than 50 mSv in a single year.	contained in RPS C-1. Therefore, the Facility is considered to be compliant with this requirement.	
2.6.2	Institutional control period		
	Following closure of the disposal facility, public access to, or alternative use of, the site shall be restricted for a predetermined period of time.	<p>The 2013 audit observed that the <i>Risk Assessment for Radioactive Waste Disposal at Mt Walton</i> performed in 1992, utilised a 300-year ICP. However, it acknowledged that the abovementioned document recommended that the ICP be formalised before the commencement of disposal operations. The 2013 audit was unsure whether this had occurred, but concluded that, given this happened many years ago it was clearly outside the scope of that audit. In 1995, the West Australian Radiological Council approved the adoption of an ICP of 100 years. More recently, in 2012, the RSO reviewed the ICP with regard to the draft IAEA Safety Guide DS356. This review concluded that an ICP of 100 years was appropriate.</p> <p>The Facility is judged to be compliant with the requirement to have a pre-determined ICP. However, the requirements to:</p> <ul style="list-style-type: none"> (a) Have the ICP established prior to commencement of operations; and (b) Not reduce the ICP without a full safety assessment; <p>have been judged to be not-applicable to this audit given that these matters would not have been relevant for a significant amount of time. It is recommended, however, that the current ICP be reconsidered during the review and development of a post-closure safety case. This is encapsulated in Recommendation R3.</p>	Compliant
	The institutional control period shall be established before commencement of disposal operations		
	However, the period shall not be reduced without a full safety assessment of the site. This assessment shall take into account the nature of the radionuclides,		



No.	Criterion	Response	Conclusion
	their total activity and activity concentrations in waste already disposed of, and the intended future use of the facility.		
2.6.3	Activity concentration limits		
	<p>Activity concentration limits for a specific disposal facility shall be calculated to cover radionuclides in each category of waste. These shall be derived from detailed assessment of the radiological impact of the facility and the possible pathways for the radiation exposure of members of the public during the operation of the facility and following its closure. Exposure scenarios appropriate to possible future uses of the site and its environs shall be included in the safety assessment... and that, after this period, the probability of any exposure within each scenario is unity, unless it can be shown to be otherwise.</p>	<p>The 2008 audit considered the Facility to be non-compliant with this requirement. However, it is unclear whether that audit report was aware of the <i>Comparative Radiological Risk Assessment for Gangue Disposal Options</i> and the <i>Risk Assessment for Radioactive Waste Disposal at Mt Walton</i>. The latter of these documents does calculate facility specific activity concentration limits for a handful of radioisotopes. On the basis of this, it is concluded that the Facility is compliant with this requirement.</p> <p>The proponent has since developed an operational safety assessment and safety case. However, it is recommended that a post-closure safety assessment and safety case be revised and documented. This is encapsulated in Recommendation R3.</p>	Compliant

No.	Criterion	Response	Conclusion
	For radioactive waste in Category A or B which has been packaged, treated or conditioned the activity concentration shall be calculated by averaging the activity of the waste over the whole conditioned package or container.	This is considered to be not applicable as no disposal campaigns have been conducted since 2008.	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.
	If this provision (the acceptance of some individual waste packages as 'Category C) is used the operator shall ensure that the concentration of each radionuclide when averaged over the volume of the disposal structure does not exceed the limit applicable to that radionuclide.	No disposal campaigns have been conducted since 2008. Therefore, this requirement is judged to be not applicable to the current audit.	Not applicable
	[For waste containing a mixture of radionuclides] The appropriate limits shall be taken from the relevant table (Tables 1, 2 or 3).	No disposal campaigns have been conducted since 2008. Therefore, this requirement is judged to be not applicable to the current audit.	Not applicable



No.	Criterion	Response	Conclusion
2.6.4	Derivation of total site activity		
	<p>A quantitative evaluation of exposures that might result from the leaching and dispersal of radioactive contaminants by groundwater shall be carried out by the proponent/operator using established hydrogeological models which incorporate site specific data. Based on this evaluation, and prior to commencement of disposal operations, the appropriate authority shall establish a limit on the total radionuclide activity for the proposed disposal facility.</p>	<p>The <i>Risk Assessment for Radioactive Waste Disposal at Mt Walton</i> performed in 1992 concluded that 'water is highly unlikely to present a significant release pathway', and therefore, 'there is effectively no credible radiological basis on which to establish a maximum total site activity limit'. Although it is understood that no limit on the total radionuclide activity has been established, it is considered that this may not be adequately conservative to account for the environmental changes that may occur over the next few hundred years.</p> <p>The 2008 audit considered the Facility to be non-compliant with this requirement. However, it is unclear whether that audit was aware of the abovementioned document. However, the proponent indicated that the above conclusion would be re-examined as part of the safety assessment process.</p> <p>On the basis of the information within the document from 1992, the Facility is judged to be compliant with this requirement. However, it is recommended that this issue be examined as part of the post-closure safety assessment for the facility. It is considered good practice to re-evaluate the limit (or lack thereof) of radioactivity allowed at the disposal site. This is encapsulated in Recommendation R3.</p>	<p>Compliant</p> <p>Refer to Recommendation R3.</p>
2.6.5	Structural stability and waste conditioning		

No.	Criterion	Response	Conclusion
	<p>The waste shall be required to meet certain criteria with respect to structural stability, firstly, to ensure the overall long-term integrity of the disposal site and, secondly, in the case of waste in Categories B and C, to ensure that it remains in a recognisable and non-dispersable form for a longer period, thereby limiting exposures in the event of inadvertent intrusion when there is unrestricted access to the site.</p>	<p>Not applicable as no disposal campaigns have been conducted since 2008. The 2008 audit recommended that documentation be prepared, if not already in existence, demonstrating that the chosen cement matrix:</p> <ul style="list-style-type: none"> a.) maintains its structure under compressive loads and possible structural changes in the waste body. b.) complies with stability requirements and protection against inadvertent intrusion. <p>The 2013 report acknowledged the Proponent’s commitment that ‘the cement matrix will be reviewed as part of the safety assessment currently being undertaken’. Hence, a modified recommendation was made at that time. A consistent approach is maintained in that it is recommended that these details be included in or referenced by the post-closure safety assessment and safety case. This is encapsulated in recommendation R3.</p>	<p>Not applicable</p> <p>Refer to Recommendation R3 f).</p> <p>This should be considered and documented for any future disposal campaigns that may occur.</p>
	<p>(a) Treatment of Category A waste shall be carried out to reduce the waste volume and to minimise voids. The minimum requirement shall be consolidation and compaction of the waste. Bulk waste in which the levels of radioactive contamination are low may meet the criteria for Category A, in which case the waste shall be required to meet the stability</p>		



No.	Criterion	Response	Conclusion
	requirements of Category C bulk waste.		
	(b) For disposal of Category B or Category C waste, the waste shall be in a form which will maintain its physical dimensions and properties under the anticipated conditions of disposal. Waste in either of these two categories shall be structurally stable for a design period of at least 300 years.		
	... Otherwise, Category C waste shall be disposed of in a container or structure which is designed to provide stability.		
	For all categories, void spaces within the waste packages or containers shall be minimised to avoid subsidence.		

No.	Criterion	Response	Conclusion
2.6.6	Qualitative physical, biological and chemical requirements		
	<p>For waste to be acceptable for disposal, the following physical and chemical characteristics shall apply to all categories of waste.</p> <p>In addition to the requirements stated below, an assessment of the likely behaviour of the waste in the geochemical environment of the facility shall be made.</p>	<p>The 2008 report recommended that a document describing the likely behaviour of the waste in the geotechnical environment be prepared (if not already in existence). The proponent indicated that the early geotechnical studies did not include this assessment and that this will be undertaken as part of the safety assessment currently being prepared. The 2013 audit included a modified version of the previous recommendation. A document entitled <i>Desktop analysis of the likely behaviour of waste in the geochemical environment of waste cells at the intractable waste disposal facility</i> was prepared in 2014. This document was reviewed as part of the current audit and consequently acknowledged that an assessment of the geochemical environment has been performed.</p>	Compliant
	<p>(a) For disposal, radioactive waste shall not contain corrosive materials; waste containing inorganic acids, alkalis and corrosive salts shall be treated to neutralise them and thereby to nullify the chemical effect of these materials.</p>	<p>The 2013 audit reviewed the <i>Waste Acceptance Guidelines</i> and <i>Waste Acceptance Proforma</i>. That audit found that, with two exceptions, all of the requirements from paragraphs 2.6.6(a)-(h) were addressed within these documents. The two exceptions were 'toxic, pathogenic or infectious material' and 'wastes containing chelating agents'. Hence, that audit recommended that guidelines be developed to address 'toxic, pathogenic or infectious material' and 'wastes containing chelating agents', prior to any future burial campaigns. The current audit, reviewed revision 13 of the aforementioned document. It was observed that it is now required that</p>	Compliant

No.	Criterion	Response	Conclusion
	(b) Where practicable, flammable or combustible materials, such as paper, plastics, cloth or resins, shall be separated from non-flammable solids and packaged, contained and labelled in a proper manner.	toxic, pathogenic or infectious materials and chelating agents must be appropriately treated or conditioned before waste is packaged. Therefore, the proponent is considered to be compliant with this requirement.	
(c) Waste shall not contain or be capable of generating gaseous materials in quantities which might lead to the release of harmful vapours or fumes, or compromise the integrity of the facility.			
(d) Waste shall not contain material which will readily detonate upon impact, decompose explosively, react violently with water or undergo vigorous exothermic reaction at normal temperatures and pressures.			

No.	Criterion	Response	Conclusion
	(e) Waste containing pyrophoric material shall be treated, conditioned or packaged to render it non-flammable.		
	(f) Liquid waste shall be solidified to be acceptable for disposal. The final package for disposal shall comply with the stability requirements for the particular category of waste.		
	(g) Radioactive waste contaminated with toxic, pathogenic or infectious material shall be treated or conditioned to minimise both the potential hazard to disposal site personnel and the long-term health risks to members of the public.		
	(h) Waste which contains chelating agents shall be treated or conditioned to reduce the possible long-term effects of leaching by water.		

No.	Criterion	Response	Conclusion
3	Facility design and operational requirements		
3.1	Facility design		
	The facility design shall comply with the requirements listed below to ensure that the objective stated in Section 2.1 is met.		
	(a) Waste shall be disposed of in a manner which ensures the integrity of the package.	<p>The 2008 audit concluded that the Facility complied with this requirement. However, it was recommended that ‘documentation be altered or developed that specifically addresses the materials used in voids between radioactive waste drums’. The proponent’s response to that audit indicated that this information was detailed in the March 2008 document submitted to the appropriate authority when requesting approval for the co-disposal of radioactive and non-radioactive waste at the Facility.</p> <p>The 2013 audit concluded that this requirement was not applicable as no disposal campaigns had been conducted since 2008. However, it did review the aforementioned documentation and found that it contained the following information:</p> <p>‘The radioactive waste containers will then be placed in position, with minimum void spaces. Any voids will be backfilled with sand...’.</p>	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.

No.	Criterion	Response	Conclusion
		<p>Hence, the 2013 audit concluded that the previous recommendation had been fulfilled.</p> <p>No disposal campaigns have been conducted since 2008, hence, the current audit considers this requirement to be not applicable.</p>	
	<p>(b) The base of a disposal structure shall be constructed in accordance with best engineering practice, and shall be capable of bearing the weight of the whole system.</p>	<p>This requirement is considered not applicable as no disposal campaigns have been conducted since 2008.</p>	<p>Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.</p>
	<p>(c) Suitable engineered barriers of natural or manufactured materials shall be incorporated in the design of the facility... For Category B and C waste the design life of the barriers shall be not less than 300 years with a structural life of 1000 years.</p>	<p>No disposal campaigns have been conducted since 2008, hence, it is considered that this requirement is not applicable.</p> <p>The 2008 audit concluded that the Facility was compliant with this requirement. However, it recommended that 'the mitigating factors associated with the use of the reported engineered barriers in the waste body and disposal facility be used in a safety assessment of the facility'. This recommendation was maintained (in a modified form) in the 2013 audit. The Proponent has prepared an operational safety case. However, a post-closure safety assessment meeting modern standards has not yet been prepared. Hence, this recommendation is maintained. This is encapsulated in Recommendation R3.</p>	<p>Not applicable</p> <p>Refer to Recommendation R3.</p>

No.	Criterion	Response	Conclusion
	<p>(d) The design shall include a suitably engineered cover for the disposal structure following a consideration of site specific parameters....</p> <p>The minimum cover requirements for each category of waste shall be:</p> <ul style="list-style-type: none"> • for Category A, two metres between the top of the waste and the top surface of cover; • for Category B, five metres between the top of the waste and the top surface of cover; • for Category C, five metres between the top of the waste and the top surface of cover. 	<p>This requirement is considered to be not applicable as no disposal campaigns have been conducted since 2008.</p>	<p>Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.</p>
	<p>(e) Backfill material shall be used to prevent subsidence and to minimise settlement within the disposal structure.</p>	<p>No disposal campaigns have been conducted since 2008. Therefore, this requirement is considered to be not applicable to this audit. However, it was observed during the site visit that substantial subsidence has not occurred.</p>	<p>Not applicable, however, this should be considered and documented for any future</p>

No.	Criterion	Response	Conclusion
			disposal campaigns that may occur.
	(f) Each disposal structure shall be accurately located and surveyed. Appropriate permanent surface and below-ground markers shall be put in place to define the boundaries and locations of disposal structures.	<p>The previous audit observed that the location of the disposal structures had been marked on a map displaying coordinates. Hence, it was concluded that the Facility was compliant with this requirement. This audit was provided with a document entitled <i>Intractable Waste Disposal Facility, Mt Walton East Information Handbook</i> (November 2017). Figures 1, 3, 6 and 7 in this document show the location of the Facility at the macro scale (i.e. the location in relation to the Country, State and region) down to the Site scale (i.e. showing the location of the shafts and the trenches within the Facility). Latitude and longitude markings precisely identify the location of the burials. Therefore, it is concluded that the Facility complies with this aspect of the requirement.</p> <p>Surface markers have previously been installed to identify the shafts and trenches. The 2008 audit recommended that ‘...the suitability of surface markers be assessed over time...’. Following that audit, the Proponent identified that the <i>Site Visit Checklist</i> requires that the surface markers be assessed. The surface markers have been photographed during the 2013 audit and again as part of this current audit. It is concluded that all of the surface markers are in place and were legible.</p> <p>The 2008 audit recommended that ‘...appropriate below-ground markers be put in place’. The Proponent’s response to that audit was that the RSO was currently investigating suitable below ground markers. The 2013 audit maintained the</p>	<p>Non-compliant¹⁴ (NC 2.)</p> <p>R4. Consideration of whether appropriate below-ground warning markers should be put in place to help prevent inadvertent access to the waste forms.</p>

¹⁴ This only applies to below-ground markers as surface markers are in place and disposal locations have been recorded.

No.	Criterion	Response	Conclusion
		<p>recommendation but observed that no waste has been buried since 2008. The current audit maintains the same approach (see Recommendation R4.) and again observes that no waste has been buried since 2008.</p>	
	<p>(g) A surface water management system shall be incorporated to control water erosion of the cover and to divert water away from any partially filled disposal structure, but shall not allow water to drain off-site.</p>	<p>The site is located in a region with low rainfall patterns. Arrangements have been documented for managing rainfall should it happen to occur during a future disposal activity. However, no disposal campaigns have occurred since 2008. The shafts and trenches are capped with a water shedding compacted clay dome and 'V' channels are adjacent to the majority of the trenches to manage the surface water and divert it away from the trenches.</p> <p>During the site visit all of the shafts/trenches containing radioactive material were examined for signs of erosion. A similar examination was conducted as part of the 2013 audit. At that time it was observed that the 2000RT01 trench showed negligible signs of erosion. The current audit observed that in limited section approximately 10 cm of the top surface material (clay) had been eroded from the 2002RT01 trench. A couple of small channels approximately 5 cm deep had developed in the 94RT01 trench and several small channels approximately 10 cm deep had developed in 2008RT01 trench. These small channels can develop through preferential water run-off patterns removing surface material. However, these same patterns can also move fine sized particles from elsewhere on the cap into these small channels. Therefore, although the surface capping should continue to be monitored there is currently no cause for concern as the caps are thick and the surface water management system is performing adequately under the prevailing environmental conditions.</p>	<p>Compliant</p>

No.	Criterion	Response	Conclusion
	<p>(h) Drainage shall be provided so that any water, which might enter the disposal structure during operations or following the closure of the site, does not accumulate within the structure.</p>	<p>This is considered to be not applicable as no disposal operations have been conducted since 2008.</p> <p>The 2008 report recommended that ‘any measures undertaken to ensure appropriate drainage of water that has entered the disposal structure be reported’. The 2013 report, identified documentation addressing the prevention of the build-up of water within the trench/shaft whilst a disposal campaign is either in progress or after the disposal campaign is complete.</p> <p>The Proponent has considered what to do if heavy rainfall is expected, or possible, while a disposal operation is in progress. This is described in <i>EP-04 Water Management</i>. This describes the following measures:</p> <ul style="list-style-type: none"> a.) Temporary soil (ideally clay) should be put at the top of the ramp to prevent water running down the ramp and into the trench. b.) Constructing v-drains in order to aid local drainage; and c.) Covering any waste already within the trench with a layer of sand and gravel and surrounding the waste with clay. <p>If, despite the above, significant rainfall collects in the trench, this document describes that it can be dried out in situ, soaked up by the introduction of sand or gravel or pumped out. All three options provide for the removal of the water so it does not remain within the trench. Hence, it is considered that this fulfils the intention of this aspect of this requirement.</p> <p>This requirement also applies to water entering the disposal structure after the disposal operation is complete. Hence, this may require engineered drainage within the trench itself so that water that does manage to enter the trench is able</p>	<p>Not applicable</p> <p>Refer to Recommendation R3h.)</p>



No.	Criterion	Response	Conclusion
		<p>to subsequently escape rather than accumulate within the shaft or trench. Alternatively, given the nature of the geology and hydrology at the site, it may be possible to argue that this is not needed or not appropriate. However, the demonstration of this would probably depend upon the safety assessment of the facility describing the post-closure performance. Therefore, it is recommended that, as part of the post-closure safety assessment, the design of the disposal trench is considered, including whether engineered drainage should be used for future disposal trenches. This has been encapsulated in Recommendation R3.</p>	
	<p>(i) Category A waste shall not be placed in the same structure as Category B or C waste, except if Category A waste is conditioned or packaged to meet the same criteria as Category B or C.</p>	<p>This requirement is not applicable as no disposal campaigns have been conducted since 2008.</p>	<p>Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.</p>
	<p>(j) A buffer zone shall be maintained between buried waste and the boundary of the disposal site. This zone shall be of sufficient area surrounding the facility operations to allow environmental monitoring to be carried out, to allow contingency measures to be carried out in an emergency,</p>	<p>The disposal site is 25 square kilometres in size. The burial trenches/shafts comprise a relatively small fraction of the total area of the site. Consequently, it was concluded that an adequate buffer zone exists to afford an appropriate level of safety to the public. Particularly as no groundwater has been detected at the site. Therefore, what is typically considered to be the primary mechanism for the movement of radioactivity away from the burial site does not currently appear to be prevalent at the Facility.</p> <p>Although the 2008 audit noted the remoteness of the site, it was recommended that the need for consideration for the inclusion of a zone of restricted occupancy,</p>	<p>Compliant</p>

No.	Criterion	Response	Conclusion
	and to ensure that during site operations there is an adequate distance between the facility and any area used by, or accessible to, members of the public.	outside the site perimeter, as a region in which there is public access, but in which permanent occupancy is prohibited be noted within the decommissioning and rehabilitation plan. It was identified that, given the requirement for regular review of this document, will be able to consider significant changes in circumstance. The proponent's response to this recommendation was to include the requirement for consideration within the EPA approved draft decommissioning and rehabilitation plan. Furthermore, the proponent/operator identified that, given the nature of the location of the Facility, it was unlikely that permanent public occupancy would be considered. However, it was identified that mining in the area is very likely. To address this, a 'File Notation Area' (FNA) has been added to the WA Department of Mines and Petroleum Tengraph database to ensure that the proponent is notified of all intended exploration and mining activity within the FNA. It is considered that this has adequately addressed the recommendation.	
3.2	Operational practices/procedures		
3.2.1	Treatment, packaging and conditioning of waste		
	Before disposal, the radioactive waste shall be treated, packaged and/or conditioned (where necessary) to ensure that it meets the criteria in Section 2 of this code for the appropriate category. The waste shall also comply with any additional specifications of the appropriate authority. The	The 2008 audit was conducted roughly at the same time as a disposal campaign. Scheduling difficulties prevented the inspection of the conditioning and packaging operation. However, upon viewing the waste drums, that audit concluded that they appeared to be appropriately conditioned, packaged and labelled. No further disposal campaigns have been conducted. Hence, the 2013 and the current audit have considered this requirement to be not applicable.	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.



No.	Criterion	Response	Conclusion
	proponent/operator shall submit a detailed specification of the proposed treatment, packaging and conditioning for approval by the appropriate authority.		
	Waste producers, or their agents, shall be provided with the necessary specifications for conditioning particular shipments of their waste to ensure that they will be acceptable for disposal at the facility.	This is considered to be not applicable as no disposals have occurred since 2008. The documentation that has previously been provided for that disposal campaign (<i>Radiological aspects of the acceptance, packaging, transportation and burial of Radioactive Waste at the Intractable Waste Disposal Facility Mt Walton East, June 2008</i>) recorded that conditioning was performed by the proponent.	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.
	The packaging of waste for shipment to the disposal site, whether in a conditioned form or not, shall be done in compliance with the relevant transport regulations.	This is considered to be not applicable as no disposals have occurred since 2008.	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.
	The proponent/operator shall institute a quality assurance program to verify that all packaging, labelling and	No disposal campaign has been conducted since 2008. Hence, the 2013 audit was unable to assess compliance against this requirement. However, the 2013 report did observe that the Facility's documentation described the following quality assurance measures are implemented during a disposal campaign:	Not applicable



No.	Criterion	Response	Conclusion
	<p>accompanying documentation accurately reflects the contents of conditioned waste packages received for disposal. This program shall meet the requirements of the appropriate authority.</p>	<ul style="list-style-type: none"> • A receiving workstation is set up in the area where the packaging is to be performed. • Sources are brought to the workstation one-at-a-time. • The sources are checked by the RSO against the waste acceptance proforma to: <ul style="list-style-type: none"> a.) Verify the identity of the item. b.) Ensure a disposal permit or approval from the Radiological Council is in place. c.) If the source is special form material (as defined in the Code of Practice for the Safe Transport of Radioactive Material) a certificate is required unless approval from the Radiological Council is provided. • The source is placed inside a numbered 60 L drum. • The number of the drum is recorded against the details of the source in the disposal inventory spreadsheet. • The 60 L drum is placed inside a 200 L drum that has been marked with a matching number. • At the disposal site, the RSO records the GPS location of each 200 L drum in the trench. <p>As no disposal campaigns have been conducted since 2008, the above arrangements have not been verified. However, they are considered to be a sound basis for assuring the proper predisposal management arrangements occur and that appropriate records are maintained after the disposal has occurred.</p>	
3.2.2 Transport			
	<p>Transportation of waste to the facility shall comply with the</p>	<p>There have been no disposal campaigns since 2008, and as such, it is considered that this is not applicable.</p>	<p>Not applicable, however, this should be considered and documented for any future</p>

No.	Criterion	Response	Conclusion
	legislative requirements for the transport of radioactive materials.		disposal campaigns that may occur.
3.2.3	Disposal operations		
	Waste shall be disposed of in accordance with the criteria and requirements of this code and following procedures which have the prior approval of the appropriate authority.	As there have been no disposal campaigns since 2008, this requirement is considered to be not applicable for this audit.	Not applicable
3.2.4	Environmental management plan		
	An environmental management plan, approved by the appropriate authority, shall be established for the disposal site prior to the commencement of its construction and operations.	<p>The 2008 report concluded that the Facility was non-compliant and recommended that the current plans and procedures be developed into a separate environmental management plan. With the aim that ‘this will allow for its approval by Radiation Health and its regular review’. Moreover, it was recommended that ‘this plan should set out management objectives and practices over the entire facility lifetime’.</p> <p>The proponent/operator’s response to that audit subsequently advised that the Facility has an Environmental, Health & Safety Management System and Management Program (EH&S Management System and Management Program) which has been reviewed and approved by the Environmental Protection Authority</p>	Not applicable

No.	Criterion	Response	Conclusion
		<p>of Western Australia and, where relevant, the Radiological Council of Western Australia.</p> <p>The 2013 audit noted that this requirement was applicable prior to the commencement of disposal operations (which happened in 1992). Therefore, it was concluded that it was not applicable to that audit and the recommendation subsequently closed on the basis of the information that was not available in 2008 and the understanding that the safety assessment and safety case will be prepared/revised.</p> <p>The current audit observes that the Facility continues to have an Environmental, Health & Safety Management System and Management Program and that this contains a number of plans, including plans addressing Air Quality, Decommissioning and Rehabilitation, Flora and Fauna, and Water. These are supported by a number of instructions and procedures.</p> <p>Despite the above, it is concluded that this requirement is not applicable as it relates to the period prior to the commencement of operations.</p>	
	<p>The environmental management plan shall include an assessment of possible exposure pathways. A program of routine on-site and off-site monitoring shall also be required within the plan and shall include appropriate measurements of radionuclides at various locations and in various</p>	<p>The 2008 report concluded that the Facility was non-compliant with this requirement and went on to recommend that an assessment of possible exposure pathways be undertaken. Moreover, it was noted that ‘this can result from a safety assessment and be used to decide upon appropriate monitoring actions during operation and post-closure of the facility’.</p> <p>The proponent’s response to that audit suggested that an assessment of possible exposure pathways had been performed and referred to the <i>Comparative Radiological Risk Assessment for Gangue Disposal Options</i> and the <i>Risk Assessment</i></p>	<p>Compliant</p> <p>Refer to Recommendation R3.</p>

No.	Criterion	Response	Conclusion
	<p>environmental media such as surface run-off and groundwater, surface soil, local plants and animals, airborne dust, together with external radiation measurements on the site perimeter and off-site. The location and frequency of sampling, sampling procedures and analytical methods shall be examined and approved by the appropriate authority.</p>	<p><i>for Radioactive Waste Disposal at Mt Walton</i> which were performed in 1989 and 1992 respectively. It is unclear whether the 2008 audit was aware of the above documents. However, from these documents, it is clear that possible exposure pathways were assessed prior to the operation of the Facility. On the basis of this, it was concluded that the Facility is compliant with this requirement. Notwithstanding the above, it is arguably good practice to review, and revise if necessary, the assessment. Therefore, the current audit maintains that the previous recommendation, as it pertains to the safety assessment, is still valid. This has been encapsulated in Recommendation R3.</p> <p>Environmental monitoring is addressed within the Performance and Compliance Reports (PCR) for 2009 and 2010 which were received as part of this audit. Some monitoring, such as groundwater monitoring is conducted regularly, regardless of whether a disposal campaign is planned or undertaken (however, as no groundwater has been detected at the site no testing for radionuclides has occurred). Whilst other types of monitoring, such as radiation monitoring (with the exception of on-going monitoring conducted every five years), dust monitoring and soil sampling are undertaken on an operational basis.</p>	
	<p>In the absence of adequate existing data, pre-operational measurements shall be carried out for at least 12 months prior to the commencement of operations to establish baseline data for each aspect of the proposed monitoring program. The adequacy of the baseline data for the assessment of the potential environmental</p>	<p>This is considered to be not applicable as the first disposal campaign at the Facility was conducted in 1992 (well before ARPANSA became the technical auditor and possibly prior to the formal publication of RHS 35).</p>	<p>Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.</p>

No.	Criterion	Response	Conclusion
	and radiological impact of the facility shall be confirmed by the technical auditor.		
	A review of the environmental management plan shall be carried out by the proponent/operator at intervals of approximately three years during the period of operation. A publicly available report detailing this review shall be provided to the appropriate authority.	<p>The 2008 report concluded that the Facility was non-compliant with this requirement. This was based upon the conclusion that publicly available reports of the review were not available. Therefore, at the time it was recommended that the environmental management plan undergo an appropriate review process.</p> <p>The proponent disagreed with this conclusion, indicating that:</p> <ul style="list-style-type: none"> • The Environmental Management plan is reviewed twice yearly; • The results of the reviews are included in the annual performance and compliance report which were being submitted to the appropriate authority. <p>The 2013 audit noted that the PCRs for 2009 and 2010 showed that the Proponent reviewed their compliance against the requirements within their EH&S Management System. However, also observed that it was not clear that the proponent has reviewed the suitability of the plan itself. Whilst it is understood that this is discussed at Management Review Meetings no documentation has been provided to demonstrate this. Therefore, the 2013 audit concluded that the Facility was non-compliant with this requirement and recommended that the</p>	Compliant

No.	Criterion	Response	Conclusion
		<p>suitability of the environmental management plan should be reviewed approximately every three years and documented.</p> <p>The <i>Performance and Compliance Report</i> (January 2014 to June 2014) adopted this recommendation and explicitly identified the objectives of RHS 35 and the intention to develop a method of assessing the continued suitability of the EH&S Management System. The <i>Performance and Compliance Report</i> (July 2016 to June 2017) has expanded on this further in terms of considering the basis for the EH&S Management System (the standards for quality, safety and environmental protection). The <i>Performance and Compliance Report</i> observes that the system was originally developed to meet the objectives of RHS 35 and that the approach, structure and content of the Facility's Management Systems have been approved by the West Australian Environmental Protection Authority and, where relevant, the appropriate authority prior to implementation. It is observed that the most recent PCR from 2016, reports that the management review meetings addressed the suitability of Finance policies, achievement of objectives and targets, EHSM program and corrective and preventative actions. On the basis of the above, it is considered that the Facility is compliant with this requirement.</p>	
3.2.5	Radiation management plan		
	<p>Before the commencement of disposal operations, the operator shall establish a radiation management plan for operations at the facility which meets the</p>	<p>The 2008 report came to the conclusion that the Facility was compliant. However, it was recommended that the documents be developed into a separate radiation management plan (RMP). The Proponent's response accepted this recommendation and undertook to prepare a RMP. However, the proponent articulated that they envisaged that the RMP would not repeat information which existed elsewhere within their documentation.</p>	Compliant



No.	Criterion	Response	Conclusion
	requirements of, and is approved by, the appropriate authority.	<p>The 2013 audit reviewed the RMP for the Facility and noted that it was a very brief document containing a high level statement to ‘use recognised current best practices for near surface disposal of hazardous and low level radioactive wastes and to remain aware of international advances in technology’ as well as targets and references to other documents and procedures.</p> <p>Whilst the brevity of the plan is noted above, it was also observed that the format, style and length was consistent for other management plans (e.g. air quality, flora and fauna, Health and Safety etc). On the basis of the above information, it was concluded that the Facility was compliant with this requirement. The current audit has confirmed that the radiation management plan is still in use and verified that it outlines an objective, management targets, management program and an improvement program. Therefore, the current audit concludes that the Facility remains compliant with this requirement.</p>	
	The radiation management plan shall address operational aspects of radiation safety. The plan shall include personnel training, personnel monitoring, maintaining records, monitoring within the operational area of the facility, designation of areas of potential radiation exposure, emergency preparedness, contamination	<p>It is observed that the following subjects are addressed in the below documents:</p> <ul style="list-style-type: none"> • personnel training is addressed in <i>RP01 –Radiation Monitoring</i>. This requires ‘all personnel who will come into close proximity with radioactive waste to attend an induction by the RSO on radiation safety prior to commencing any involvement with the material’. Furthermore, it is required that ‘training will be undertaken, and records kept, in accordance with FMC Management Procedure FMP-03 Training’. • personnel monitoring is addressed in <i>RI-02 Occupational Radiation Monitoring</i>. This document addresses personal monitoring for external radiation using both passive monitors and integrating electronic 	Compliant

No.	Criterion	Response	Conclusion
	control and protective clothing and apparatus.	<p>dosimeters. Furthermore, personal air sampling is also addressed within this document.</p> <ul style="list-style-type: none"> • maintaining records is addressed in <i>FMP-02 Record Management</i>. This document describes, amongst other things, the control of records relating to the Facility so they remain legible, accessible, traceable and are protected against loss or damage. • monitoring within the operational area of the facility is addressed in <i>RI-01 Gamma Radiation Monitoring</i>. This document describes the monitoring that is to occur before disposal, after disposal and on an ongoing basis. • designation of areas of potential radiation exposure is addressed in <i>RP01 – Radiation Monitoring</i>. This document identifies the loading and unloading areas at the RHS Radiation Store and the unloading area and temporary storage area at the Facility as designated supervised areas. • emergency preparedness is addressed within <i>ERP-01 Incident Prevention, Reporting and Investigation, ERP-02 Emergency Response Management, ERI-01 Injury & Evacuation Response, ERI-02 Waste Incident and Spill Response, ERI-03 Fire Response and ERI-04 Transport Emergency Response</i>. • contamination control is addressed in <i>SI-03 Hygiene and Decontamination</i>. • protective clothing and apparatus (i.e. respirators) is addressed in <i>SI-02 Personal Protective Equipment</i>. <p>On the basis of the above, it is concluded that the plans in place address the specified operational aspects of radiation safety.</p>	
	The radiation management plan shall be reviewed by the operator at approximately three yearly	The 2008 report decided that the Facility was non-compliant with this requirement. The proponent indicated that the RMP will be incorporated into the EH&S Management System which will result in it being reviewed and audited	Compliant

No.	Criterion	Response	Conclusion
	<p>intervals during the period of operation and the operator shall submit a publicly available report detailing this review to the appropriate authority.</p>	<p>annually. Whilst the authors of the 2013 audit noted that the PCRs for 2009 and 2010 showed that the Proponent reviewed their compliance against the requirements within their EH&S Management System it was not clear that the proponent had reviewed the suitability of the plan itself. Although it was understood that this is discussed at Management Review Meetings no documentation had been provided to demonstrate this. Therefore, that audit concluded that the Facility was non-compliant with this requirement and recommended that the suitability of the radiation management plan should be reviewed approximately every three years and that the review should be documented.</p> <p>The response to the 2013 audit undertook to explicitly require that the suitability of the objectives of the RMP to be reviewed. The current audit observes that section 4.5.1 of <i>MP-04 Environmental, Health and Safety Management Program</i> has been amended accordingly. The PCR from 2016 reported that management review meetings have addressed the suitability of Finance’s policies, achievement of objectives and targets, EHSM program and corrective and preventative actions</p> <p>On the basis of the above, the recommendation has been closed and the Facility is considered to be compliant with this requirement.</p>	
3.2.6	Contingency plans/emergency response procedures		
	<p>Contingency plans shall be prepared by the operator of the facility and be approved by the appropriate authority. The purpose of the plans shall be to address possible emergencies,</p>	<p>The Proponent has prepared a series of emergency response procedures and instructions. These include <i>ERP-01 Incident Prevention, Reporting and Investigation (Revision 8)</i> which defines what is an incident and <i>ERP-02 Emergency Response Management (Revision 8)</i> which identifies three main types of emergency procedures. These cover injury and evacuation, waste incident emergency response, and fire response. Further specific instructions have been documented</p>	Compliant

No.	Criterion	Response	Conclusion
	such as fires, operational accidents, and other sources of potential releases from the facility, and to provide a response guide to such events.	in <i>ERI-02 Waste Incident & Spill Response</i> (Revision 8) which describes how to respond to the failure of a waste container or the spillage of waste and <i>ERI-03 Fire Response</i> (Revision 8) which addresses the management of a potential fire. Although it is unclear if the appropriate authority has approved these plans it is acknowledge that they have been developed. Hence, the Facility is judged to be compliant with this requirement.	
	However, the operator of the facility shall advise the appropriate authority without delay of any change in circumstances which may affect the operational safety of the facility. In such situations the operator shall take into account guidance from the appropriate authority.	The documents describing the emergency response arrangements are current. Although <i>ERI-01 Injury and Evacuation Response</i> has a note regarding the closure of the Mt Dimer Airstrip and the requirement to arrange an alternative prior to the next disposal operation this is not considered to affect the operational safety of the facility until a disposal campaign is conducted. Therefore, it is concluded that this requirement is currently not applicable. However, it is suggested that this be considered and documented prior to any future disposal campaigns that may occur.	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.
3.2.7	Records and inventory keeping		
	Detailed records shall be kept by the operator and by the appropriate authority of all waste consigned to, and received at, the facility. For each shipment the waste generator, the type of the	The 2008 report was unable to verify compliance with this requirement. The 2013 audit, reviewed the close-out report for the previous 2008 disposal campaign along with the <i>Radiological Aspects of the Acceptance, Packaging Transportation and Burial of Radioactive Waste at the Intractable Waste Disposal Facility Mt Walton East, June 2008</i> . It was identified that the pertinent details were recorded. Whilst some of the details were not explicitly stated, such as volume, weight and	Compliant Refer to Recommendation R5.

No.	Criterion	Response	Conclusion
	waste, its volume and weight, and the nature and concentration of radionuclides in the waste shall be recorded. Any conditioning of the waste shall also be recorded.	concentration of radionuclides, that report judged that given the standardised manner in which the waste is packaged and conditioned these elements are not strictly relevant. Therefore, the Facility was judged to be compliant with this requirement. As no disposals have occurred since 2008, the current audit has not differed from this conclusion, however, it is recommended that efforts be placed towards the completion of the database of waste held at the Facility. This is encapsulated in Recommendation R5.	
	Details of any accidents and incidents at the facility shall be kept together with information on the impact on personnel, the public and the environment.	The 2013 audit observed that the proponent has developed a document describing the investigation of all types of incidents and accidents (not just radiological). This is <i>ERP-01 Incident Prevention, Reporting and Investigation</i> . This document still exists. Version 8 was provided as part of this audit. Although no radiological accidents or incidents have occurred at the Facility, arrangements are in place if it should occur in the future.	Not applicable
	The occupational exposure records of all employees exposed to radiation in the course of their work shall be retained in a form specified by the appropriate authority. All data from environmental and area monitoring at and around the facility shall also be retained.	The 2013 audit reviewed <i>RP-01 Radiation Management</i> and observed that it specifies that the RSO is responsible for maintaining records relating to radiation monitoring. The 2013 audit also reviewed a document entitled the <i>Radiological Aspects of the Acceptance, Packaging Transportation and Burial of Radioactive Waste at the Intractable Waste Disposal Facility Mt Walton East, June 2008</i> . It was observed that this contained a section on occupational exposure which detailed the measured doses received by personnel involved with the 2008 disposal campaign. The 2013 audit also considered the <i>Gamma Radiation Survey and Site Visit for Intractable Waste Disposal Facility Mt Walton East: December 2012</i> which provides absorbed dose measurements taken in and around the compounds from 1993 to 2012. On the basis of the above information the 2013 audit concluded that the Facility is compliant with this requirement.	Compliant



No.	Criterion	Response	Conclusion
		<p>The current audit has observed that no disposal campaigns have been conducted since 2008 and understands that the retention and destruction instructions for the documents associated with the facility are marked 'unlimited' (i.e. no disposal date). On the basis of this and the previous information, it is concluded that the Facility is compliant with this requirement.</p>	
	<p>Furthermore, site records shall be kept at least until the end of the institutional control period in two widely separated locations, one of which shall be the appropriate State or Federal government archives, and shall include:</p>	<p>The 2013 audit assessed the facility, under the circumstances, to be adequately fulfilling this requirement. This is because, at the time, the West Australian Government archives were no longer accepting hardcopy records (due to capacity reasons). Therefore, documents relating to the Facility were kept by both the Proponent and by the Proponent's contractor who occupy separate premises in different suburbs so the two sets of records were geographically separated. Hence, it was judged that the facility was doing the best it could given the limitations.</p> <p>It is understood that the State archives now has some capacity to accommodate new records. However, this appears to be conditional, only accepting records that are over 25 years old and where the responsible party can no longer preserve them. The documents are held in two formats, both hard-copy and digitally, and the retention and destruction instructions are marked 'unlimited' so that the documents will never be destroyed. The records are held by the Radiological Council of WA and Finance who have obligations under the State Records Act 2000.</p>	<p>Compliant (as far as practicable)</p>



No.	Criterion	Response	Conclusion
		<p>As per the 2013 audit, it is acknowledged that the records are not in the State archives, however, it is concluded that this is due to factors beyond the Proponent/Operator's control. However, it is expected that efforts to pursue access to the state government archives be continued.</p>	
	<p>(a) the location of any disposal structures;</p>	<p>The Proponent has published an <i>Intractable Waste Disposal Facility, Mt Walton East Information Handbook</i> (November 2017). Figures 1, 3, 6 and 7 in this document show the location of the Facility at the macro scale (i.e. the location in relation to the Country, State and region) down to the Site scale (i.e. showing the location of the shafts and the trenches within the Facility). Latitude and longitude markings precisely identify the location of the burials. Therefore, it is judged that the Facility complies with this requirement.</p>	<p>Compliant</p>
	<p>(b) the location of the waste packages or containers within the structures and the date of their emplacement;</p>	<p>The 2008 report was unable to verify compliance with this requirement. The 2013 reported reviewing the <i>Radiological aspects of the acceptance, Packaging and Burial of Radioactive Waste at the Intractable Waste Disposal Facility Mt Walton East (June 2008)</i>. This document included a diagram clearly showing the relative location of the waste packages within the 2008RT01 burial trench. On the basis of this, the Facility was judged to be compliant with this requirement.</p> <p>This audit reviewed the <i>Radioactive Waste Register (v20)</i>. This details many aspects of the waste including container identifications, container contents and position location and level number. Work on the database appears to be ongoing with details from the 2008 trench still to be completed. However, given that these details are recorded elsewhere for this disposal operation, the facility is judged to</p>	<p>Compliant</p> <p>Refer to Recommendation R5.</p>

No.	Criterion	Response	Conclusion
		be in compliance with this requirement. It is recommended that the database be finalised. This is encapsulated at Recommendation R5.	
	(c) details of the contents of waste packages or containers; and	This requirement is discussed in section 2.5.	Refer to section 2.5 of this Table
	(d) details of the backfilling and cover materials.	<p>The Proponent has published an <i>Intractable Waste Disposal Facility, Mt Walton East Information Handbook</i> (November 2017). This summarises pertinent details of each of the disposal cells. This is provided below.</p> <p>The two shafts (92RS01 and 94RS01) were each 2 metres wide and 28 and 27 metres deep respectively. Shaft 92RS01 contains sixty-six 205 Litre drums and one metre long cylinder and shaft 94RS01 contains sixty-nine 205 Litre drums. These were progressively concreted in place with 5.8 metres of local clay used to reach ground level and provide a cap.</p> <p>The 94RT01 trench houses three 6 m shipping containers containing equipment with radium contamination. The void spaces in the shipping containers were filled with cement slurry. With 4.5 metres of local clay used to reach ground level and provide a cap.</p> <p>The 2000RT01 trench was used for the disposal of radioactive and chemical waste. The chemical waste was buried first, then a specially constructed clay barrier was created to separate this from the sixty-four 205 Litre drums of radioactive waste. With 8.0 metres of local clay used to reach ground level and provide a cap.</p>	Compliant

No.	Criterion	Response	Conclusion
		<p>The 2002RT01 trench was also used for disposal of chemical and radioactive wastes. The chemical waste was buried first, then a clay barrier was constructed to separate the radioactive waste from the chemical waste and then the five 205 litre drums and one concrete encased safe containing low level radioactive waste were placed in the trench, with 9.2 metres of a multi-layer cap on top.</p> <p>The 2008RT01 trench was used for disposal of chemical and radioactive wastes. The chemical waste was buried first, then a clay barrier was constructed to separate the radioactive waste from the chemical waste and then sixty-two 205 litre steel drums of radioactive waste were placed in the trench, with 8.5 metres of a multi-layer cap on top.</p> <p>Based upon the above information, the Facility is considered to be compliant with this requirement.</p>	
3.3	Disposal facility closure		
	<p>Operations shall cease at the disposal facility when the authorised disposal space is filled or the limit on total site radioactivity is reached. Unrestricted public access to the site or alternative use of the site shall not be permitted for the duration of the established period of institutional control. At the end</p>	<p>Disposal operations at the Facility have been of a campaign nature and have occurred when there is sufficient waste to justify the effort and expense. Hence, the disposals have occurred sporadically over the years. They have been conducted in 1992, twice in 1994, 2000, 2002 and 2008. The site occupies 25 km² of Crown Reserve land and the disposal shafts and trenches from previous campaigns occupy just a small fraction of this area. The <i>Risk Assessment for Radioactive Waste Disposal at Mt Walton</i> 1992 (Industrial Risk Management) concluded that 'there is effectively no credible radiological basis on which to establish a maximum total site activity limit'. The Facility is operational and given</p>	<p>Not applicable</p> <p>Refer to Recommendation R3e.)</p>



No.	Criterion	Response	Conclusion
	<p>of the established institutional control period the status of the site shall be reviewed to determine whether any further management or control should be instituted.</p>	<p>the sporadic need to conduct disposal operations, the ample space¹⁵ and the lack of a limit on the total site radioactivity it is difficult to predict when operations will cease. However, it is suggested that this should be considered and documented for any future disposal campaigns that may occur.</p> <p>Upon termination of operations, the site must remain under institutional control in order to restrict access to and use of the site, and to ensure an ongoing knowledge that the site has been used for the disposal of radioactive waste. An institutional control period of 100 years has been set by the appropriate authority. In 2012, the Radiation Safety Officer for the Facility reviewed this figure and concluded that it is appropriate. The current audit considers that as the facility is currently operational, this requirement is not applicable. However, it is recommended that the ICP be reconsidered as part of the post-closure safety assessment. This is encapsulated in Recommendation R3.</p>	
	<p>Prior to the commencement of operations the operator shall prepare draft or conceptual plans for decommissioning the facility and rehabilitating the site, and submit them to the appropriate authority for approval. These plans shall be reviewed every five years and resubmitted for approval. The</p>	<p>The 2008 report noted that draft plans (which outlined the actions envisaged for three remediation options) were in place as part of the financial planning for future works. However, that audit concluded that the Facility was non-compliant with this requirement and went on to recommend that the plans be submitted to Radiation Health for approval. The proponent/operator's response to the 2008 audit was that the <i>Ministerial Statement No. 562</i> requires the decommissioning and rehabilitation plan to be finalised 6 months prior to the closure of the Facility. The abovementioned Ministerial Statement was reviewed as part of the 2013 audit and it was confirmed that this requirement is stipulated within that document.</p>	<p>Not applicable</p>

¹⁵ No limitation on disposal space at the Facility has been identified.

No.	Criterion	Response	Conclusion
	operator shall apply to the appropriate authority to cease operations at the facility at least three years prior to the proposed date of closure. At this time detailed plans for the decommissioning of the facility and for site rehabilitation shall be submitted to the appropriate authority for approval.	Therefore, it was concluded that this requirement is not applicable to this Facility (as another arrangement is in place). However, that audit concluded that this approach is arguably not best practice. Consequently, it was recommended that the proponent review the draft plans for remediation every five years, and consequently, seek approval from Radiation Health. The current audit observes that the Decommissioning and Rehabilitation Plan - B Long term and Site Closure has implemented the above recommendation into the ongoing Management Program and committed conducting a review and seeking approval every 5 years. The 2016 PCR reports that this was submitted to the appropriate authority in July 2015. On the basis of this, the previous recommendation is closed.	
	The operator shall remain responsible for the site and all necessary site rehabilitation work until the work is formally accepted to be satisfactory by the appropriate authority.	This requirement is currently not applicable as the Facility is currently operational.	Not applicable
	The appropriate authority shall ensure that a program of surveillance involving site inspections and environmental monitoring is carried out during the institutional control period, and that historical records of	This requirement is not applicable as the Facility is currently operational. The proponent/operator has established, and maintained, a fund to ensure that adequate monies are available to perform the necessary monitoring and any maintenance required over the ICP. The methodology, however, for the calculation of the necessary funds is still in draft form. It is expected that efforts will be made	Not applicable

No.	Criterion	Response	Conclusion
	waste disposed at the site are preserved. The perimeter fence and site markers shall be maintained during this period. The location and purpose of the disposal site shall be marked on land titles as caveats or mentions for the institutional control period.	to formalise the methodology to ensure that adequate monies are available when required.	
3.4	Post-institutional control land use		
	At the end of the institutional control period the site shall be cleared of any remaining fences, site markers, etc.	As the Facility is still operational this requirement is not applicable. The 2013 audit reviewed a document describing the <i>Provision for Rehabilitation of Site</i> . This provided three remediation scenarios with varying cost estimates. All three options include the 'removal of all infrastructure including buildings the concrete hard stand, fuel and water tanks, weather station septic systems and fences'. Hence, it was previously concluded that measures were in place to ensure that the relevant actions will be taken at the appropriate time. This document was not reviewed as part of the current audit.	Not applicable
4.1	Appropriate authority (out of scope)		
4.2	Approvals and authorisations		
	The following actions shall be required to proceed to the construction and continued	Not applicable as the initial construction occurred in circa 1992 which was substantially before ARPANSA became the technical auditor for the facility. It is observed that no disposals have occurred since 2008. However, as the design of	Not applicable, however, this should be considered and documented for any future

No.	Criterion	Response	Conclusion
	<p>operation of a disposal facility and its subsequent closure.</p> <p>(a) The proponent shall submit a preliminary disposal facility design and an analysis of potential sites for the facility to the appropriate authority. These shall be based upon the criteria contained within this code... Approval to proceed to the development of a detailed design and to carry out an environmental and radiation assessment of the preferred site shall be obtained from the appropriate authority.</p>	<p>the disposal cells has evolved from shafts to trenches over the years, it is suggested that the design of any future disposal cells be submitted to the appropriate authority, prior to any future disposal campaigns.</p>	<p>disposal campaigns that may occur.</p>
	<p>(b) The proponent/operator shall prepare an environmental and a radiation assessment, including a safety analysis of the proposed facility design and operation addressing the criteria detailed in Sections 2 and 3 of this code... Relevant Commonwealth/State</p>	<p>The aspects of these requirements were addressed in sections 2 and 3 above.</p>	<p>Refer to sections 2 and 3 of this table.</p>

No.	Criterion	Response	Conclusion
	legislation shall be adhered to.		
	(d) Construction of a facility shall commence at the chosen site only with approval of the appropriate authority.	Not applicable as the initial construction occurred in circa 1992 which was well before ARPANSA became the technical auditor for the facility. Although, it is observed that the construction specifications for each shaft/trench have been approved by the appropriate authority. This should be considered and documented for any future disposal campaigns that may occur.	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.
	(g) The proponent/operator shall submit plans for decommissioning the facility to the appropriate authority prior to commencement of operations. These plans shall be reviewed and resubmitted for approval every five years.	This issue was addressed in section 3.3 above.	Refer to section 3.3 of this table.
4.3	Proponent/operator		
	During the planning, operation and closure of the waste disposal facility the proponent/operator shall:		

No.	Criterion	Response	Conclusion
	<p>(a) prepare and submit all the necessary documentation for approvals and all authorisations required by the appropriate authority at each stage of the development, operation and closure of the disposal facility as outlined in Section 4.2;</p>	<p>No disposal campaigns have been conducted since 2008 and as there has been no identified need to seek approvals and authorisations from the appropriate authority this is considered to be not applicable.</p>	<p>Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.</p>
	<p>(b) operate the facility in accordance with written procedures that meet the requirements of this code and those of the appropriate authority;</p>	<p>The Facility is technically in the 'operational' stage. However, no disposal campaigns have been conducted since 2008. No staff are employed at the facility in-between campaigns and waste is not received or stored at the Facility outside of disposal campaigns.</p> <p>Written procedures for the Facility have been prepared for past operations and are maintained in advance of future operations. The Proponent has an extensive Environmental, Health & Safety Management System.</p> <p>In 2008, it was concluded that the Facility was compliant with this requirement. Although knowledge retention is a concern, as there is a very small number of personnel with extensive knowledge of the Facility and past operations, it is concluded that the Facility is compliant with this requirement.</p>	<p>Compliant</p>

No.	Criterion	Response	Conclusion
	(c) provide the necessary specifications for the treatment and/or conditioning of particular shipments of waste to waste producers or their agents; alternatively, comply with these specifications for conditioning which may be carried out at the facility under exceptional circumstances;	These requirements were addressed in section 3.2.1.	Refer to section 3.2.1 of this table.
	(d) instruct all employees in safe working practices as approved by the appropriate authority, provide adequate protective and monitoring equipment, and ensure that the precautions necessary to limit radiation exposure are followed;	<p>There was no opportunity to verify compliance with this requirement as no disposal campaign has been conducted since 2008. Therefore, this requirement is considered to be not applicable.</p> <p>Despite the above, <i>RP-01 Radiation Management</i> (Revision 10) was provided during the audit. This document defines the duties of the RSO to include:</p> <ul style="list-style-type: none"> • ‘instruct all persons handling radioactive material on the premises of the safe working practices to ensure limited radiation exposure’; • ‘Ensure that all persons handling radioactive material on the premises are supplied with appropriate protective equipment’; • ‘Supervise, and monitor, all persons handling radioactive material on the premises to ensure that correct work practices are used’. 	Not applicable

No.	Criterion	Response	Conclusion
		<p><i>This is supported by RI-01 Gamma Radiation Monitoring and RI-02 Occupational Radiation monitoring.</i></p> <p><i>RI-01 Gamma Radiation Monitoring (Revision 9) specifies that gamma radiation levels are measured using a calibrated geiger counter (Mini Instrument Environmental Meter type 6-80).</i></p> <p><i>RI-02 Occupational Radiation monitoring (Revision 10) this describes how passive and electronic personal dosimetry is conducted and specifies that personal air sampling for inspirable dust shall be undertaken as per Australian Standard.</i></p> <p>On the basis of the above, there is confidence that the proponent will ensure that these requirements will be met during any future disposal campaigns that may occur.</p>	
	<p>(e) ensure that, when averaged over the whole disposal structure, the concentrations of radionuclides in the waste do not exceed the limits on activity concentration and total site activity that have been approved, or specified, by the appropriate authority;</p>	<p>This is not applicable as no disposal campaigns have been conducted since 2008. However, the 2013 audit noted that <i>RP-01 Radiation Management requires</i> that, when accepting waste, 'if the item is found to be acceptable, it shall be ... placed into a marked bin ... The maximum activity permissible in each bin needs to be known and not exceeded...'. It was previously concluded that, by knowing the isotope, and the activity, of each source that is placed in a bin, and thereby not exceeding the maximum activity allowable within a bin, it is virtually impossible for the total activity concentration of the Facility to be exceeded. On the basis of the above, there is confidence that appropriate measures were in place to ensure compliance with activity concentration limits. The current audit has maintained the conclusion that measures are in place to ensure this for any future disposal campaigns that may occur and noted that no total site activity limit has been set.</p>	<p>Not applicable</p>

No.	Criterion	Response	Conclusion
	<p>(f) establish environmental and radiation management plans with the approval of the appropriate authority and perform any monitoring that is required within these plans, including the assessment and recording of radiation doses received by employees and others;</p>	<p>The Facility has an Environmental Health and Safety Management System (EHSMS) and it is understood that the appropriate authority has approved the use of the system for the management of the Facility. This EHSMS includes management plans for 'air quality', 'decommissioning and rehabilitation', 'flora and fauna', 'radiation', and 'water'. The Radiation Management Plan sets targets for having minimal release of radiation into the environment (compared to environmental background) and radiation levels within the safe occupational limits for workers. Another document, <i>RP-01 Radiation Management</i> sets out the 'on-going monitoring' and the 'occupational radiation monitoring' that is to be conducted. This document also makes it one of the duties of the RSO to 'conduct regular area and personal radiation monitoring as per the approved Environmental Management Plan and the Radiation Management Plan'. On-going monitoring is conducted on a five-yearly basis and a section in the Performance and Compliance Reports is dedicated to this subject. As no disposal campaigns have been conducted since 2008, there has been no need for operational radiation monitoring of employees. However, it is noted that the submission made to the Radiological Council seeking approval for the 2008 campaign indicates that personal dosimeters and integrating electronic dosimeters will be worn by staff and contractors directly involved with the acceptance, cementing, concreting, transporting and burying of waste. Furthermore, the current audit notes that the results of this monitoring was discussed in a document entitled the <i>Radiological Aspects of the Acceptance, Packing, Transportation and burial of Radioactive Waste at the Intractable Waste Disposal Facility Mt Walton East, June 2008</i>. Consequently, this is taken as evidence that this occurred during the 2008 disposal campaign. On the basis of this, it is concluded that the Facility is compliant with this requirement.</p>	<p>Compliant</p>

No.	Criterion	Response	Conclusion
	(g) prepare detailed procedures to be implemented in the event of an accident, incident or emergency at the facility, submit these contingency plans to the appropriate authority for approval prior to the commencement of operations, and then ensure that employees are familiar with these plans;	This requirement has been addressed in section 3.2.6.	Refer to section 3.2.6 of this table.
	(h) maintain all records related to the disposal of radioactive waste at the facility, including radiation and environmental monitoring, as specified in Section 3.2 in this code and as required by the appropriate authority;	This requirement has been addressed elsewhere (section 3.2.7).	Refer to section 3.2.7 of this table.
	(i) submit regular reports, as detailed in Section 4.6 of this code, to the appropriate authority;	The Performance and Compliance Reports (PCRs) detail the Facility's compliance with <i>Ministerial Statement No. 562</i> , permits, registrations, licenses and associated management plans and systems. The reports covered the following periods were provided for review: a.) January 2013 - December 2013	Not applicable, however, this should be considered and documented for any future disposal campaigns that may occur.



No.	Criterion	Response	Conclusion
		<p>b.) January 2014 - June 2014 c.) July 2014 - June 2015 d.) July 2015 - June 2016 e.) July 2016 - June 2017</p> <p>These reports are prepared by the Facility Management Contractor (FMC) on the proponent/operator's behalf. However, it is understood that the PCRs have not been formally approved by the Proponent since 2014. Therefore, it is assumed that they have not been transmitted to the appropriate authority. However, as a PCR is strictly only required when a disposal occurs and no disposals have occurred since 2008, this requirement is considered to be not applicable.</p>	
	(j) provide a plan for the rehabilitation of the site and decommissioning of the facility to the appropriate authority for approval prior to the commencement of operations, and subsequently revise and resubmit these plans for re-approval at Five yearly intervals;	The arrangements for the decommissioning and rehabilitation are discussed in Section 3.3.	Refer to section 3.3 of this Table.
	(k) apply to the appropriate authority for approval to decommission the waste facility not less than three years prior to the proposed closure date;	This issue was addressed in Section 3.3 above.	Refer to section 3.3 of this Table.

No.	Criterion	Response	Conclusion
	(l) decommission the facility and rehabilitate the site in accordance with previously approved plans and any additional requirements of the appropriate authority;	Not applicable as it is not yet planned to decommission the Facility and remediate the site. It is discussed in section 3.3 of this table that the <i>Decommissioning and Rehabilitation Plan - B Long term and Site Closure</i> has been developed within the EHSMS. This commits the Facility to a review of the rehabilitation scenarios every five years and seek approval from the appropriate authority. It is intended to prepare a decommissioning statement six months prior to decommissioning the Facility. This is discussed in section 4.6.1f) of this table.	Not applicable Refer to section 4.6.1f.) of this table.
	(m) provide any medical examinations for employees which are required by the appropriate authority;	This requirement is not applicable as the appropriate authority has not required employees at the Facility to have medical examinations. In the past, some limited medical examinations have been conducted in preparation for disposal campaigns. However, these have related to establishing baseline data to demonstrate that exposure to chemical hazards have not occurred and have had nothing to do with radiological exposure. Hypothetically, in the future a test of lung capacity could be conducted to demonstrate that workers are able to properly use full face respirators in an emergency situation. This, however, relates to traditional WHS matters and is outside the scope of this audit.	Not applicable
	(n) report in detail to the appropriate authority all accidents or incidents, and action taken to prevent such occurrences as required by the appropriate authority; and	This requirement is not applicable as no radiological incidents or accidents have occurred. Responsibility for investigating known, or suspected, occurrences or accidents has been given to the Radiation Safety Officer (RSO). This is documented in <i>RP-01 Radiation Management</i> . This document also requires the RSO to report the matter and initiate any corrective actions. By establishing and recording the RSO's responsibilities in this area gives the current audit confidence that the	Not applicable

No.	Criterion	Response	Conclusion
		appropriate reports will be prepared and submitted, if necessary, to the Radiological Council.	
	(o) recommend to the appropriate authority a technical auditor as required under this code.	Given the potential for the appearance of a conflict of interest, the technical auditor has not examined this requirement. However, it is observed that ARPANSA has been performing the role of Technical Auditor since 2008 and it is presumed that this previously occurred.	Not assessed
4.4	Employee responsibilities		
	<p>Employees at the waste disposal facility shall:</p> <p>(a) prior to commencement of their employment, notify the employer of all previous work involving radiation and subsequently attend such familiarisation courses and re-training as required;</p> <p>(b) use protective equipment and radiation monitors as directed;</p>	<p>The proponent provided a document entitled <i>RP-01 Radiation Management</i> (Revision 10). Section 7 of this document requires all personnel who may potentially be exposed to radioactive material attend a radiation safety induction prior to any involvement with the material. Section 16 of this document also requires personal monitoring devices to be used in accordance with section 25A of the Regulations and that all personnel who may potentially be exposed to radioactive material to wear EPDs.</p> <p>Another document entitled <i>FMC Responsibilities Table</i> (Revision 8) requires site personnel to:</p> <ul style="list-style-type: none"> • Undertake activities in accordance with training and under direction of Operations Manager or Site Manager and other supervisors • Take all reasonable precautions to prevent injury to themselves and fellow personnel and to prevent damage to the environment 	Compliant

No.	Criterion	Response	Conclusion
	(c) report any defects in plant or equipment to the proponent/operator as soon as they become aware of them;	<ul style="list-style-type: none"> • Report incidents and near misses to Site Manager or Site Safety Manager <p>These broad requirements are accepted as fulfilling the requirements, whilst still providing the Facility with an adequate level of flexibility. On the basis of this, it is judged that the Facility is compliant with this requirement.</p>	
	(d) modify equipment or plant only with the approval of the operator;		
	(e) undergo all relevant medical examinations requested by the operator or by the appropriate authority;		
	(f) follow work practices necessary for compliance with Section 4.3 of this code; and		
	(g) report all incidents and accidents to their supervisor.		
4.5	Technical auditor		

No.	Criterion	Response	Conclusion
	<p>The independent technical auditor, appointed under Sections 4.1(n) and 4.3(o) shall have expertise in radioactive waste management. The technical auditor shall review all the actions of the proponent/operator required by this code and provide publicly available reports to the appropriate authority:</p> <p>(a) prior to the commencement of actual burial operations; and</p> <p>(b) annually thereafter, within one month following the presentation of the proponent/operator's public annual report required under Section 4.6 of this code.</p>	<p>Given the potential for the appearance of a conflict of interest, the technical auditor has not examined this requirement. However, it is observed that the required frequency for Technical Audits was extended by the appropriate authority from 1 to 5 years in 1999 on the proviso that no new burial of radioactive waste has occurred at the site. Similarly, PCRs are not required every year unless a disposal occurs. No disposal operation has been conducted at the site since 2008. It is the purpose of this report to document the current technical audit. This examines the actions taken by the proponent/operator against the requirements of RHS 35 during the period from 2013 to 2018. ARPANSA previously conducted technical audits in 2008 and 2013.</p>	<p>Not assessed.</p>
4.6	Reporting procedures		

No.	Criterion	Response	Conclusion
4.6.1	Proponent/operator		
	The proponent/operator shall consult with the appropriate authority regarding the information to be supplied and the manner in which the facility operations will be reported. Reporting shall include a public annual report which details at least the following information:	Performance and Compliance Reports (PCRs) are used to detail the Facility's compliance with the various requirements. Further details of the PCRs is provided at section 4.3(i) above.	Refer to section 4.3i.) of this table.
	(a) a list of all waste received, buried or in storage;	During the 2013 audit, the close out report for what was then the most recent disposal campaign (2008) was reviewed. It was observed that this described the waste that had been buried. Hence, the Facility was judged to be compliant with this requirement. A database describing all of the radioactive waste buried at the site from each of the disposal campaigns exists. During the preparation of this database, some discrepancies and uncertainties were identified in matching up the records associated with the sources. There is the real potential that information regarding these sources may be lost with the passage of time. Hence, it is recommended that the discrepancies and uncertainties are reviewed, and if possible, addressed in a timely manner (see Recommendation R5.).	Compliant R5. Future development of the database of waste disposed at the facility explicitly include the category of radioactive waste (i.e. A, B or C) for each drum.
	(b) a statement that records of the waste material and its	Table 6 of the <i>Performance and Compliance Report</i> for 2016 describes the outcome of the internal compliance audit of procedures within the Finance	Compliant

No.	Criterion	Response	Conclusion
	disposal location have been properly kept (see Section 3.2.7) and audited;	<p>Environmental, Health and Safety Management System 2016-2017. Within this table, amongst other things, compliance against the requirements of <i>MP-07 Management of Records</i> is described. Requirement 4.5 is:</p> <p><i>The waste volume, type, owner, packaging, trench design and reports for each disposal operation have been entered into the IWDF's public access database.</i></p> <p>The following evidence/comment was recorded against this requirement:</p> <p><i>The IWDF's public access database was updated at completion of the 2008 Disposal Operation – more recently radioactive and chemical spreadsheets have been prepared to provide additional waste database resource.</i></p> <p>This statement demonstrates that records of the waste material and its disposal location have been kept and audited. Therefore, it is concluded that the Facility is compliant with this requirement.</p>	
	(c) the state and condition of equipment and plant, necessary for maintenance or major modifications foreseen as necessary to it and to the site;	When a disposal campaign is conducted, plant and equipment is brought to the site. However, the site is typically unoccupied with minimal plant and equipment ¹⁶ remaining in-between disposal campaigns. Each disposal structure is backfilled and capped at the end of each campaign. Therefore, as there is not a need for ongoing maintenance or major modifications to be implemented, there is no need for the equipment and plant required to perform these functions. Hence, this requirement is deemed to be not applicable to the Facility.	Not applicable

¹⁶ This acknowledges the presence of the site office and accommodation even though they are ancillary to the performance of the Facility in radiological terms.

No.	Criterion	Response	Conclusion
	<p>(d) details of all accidents and incidents at the facility together with information on the potential or actual impact on the site personnel, members of the public and the general environment, as reported to the appropriate authority (for the public report personal details shall remain confidential);</p>	<p>The Performance and Compliance Reports for the following periods were provided:</p> <ul style="list-style-type: none"> a.) January 2013 - December 2013 b.) January 2014 - June 2014 c.) July 2014 - June 2015 d.) July 2015 - June 2016 e.) July 2016 - June 2017 <p>Each of these reports state that no incidents occurred during the reporting period. Hence, it is concluded that the Facility is compliant with this requirement.</p>	Compliant
	<p>(e) a summary and interpretation of results from the radiation and environmental management programs; and</p>	<p>The most recently produced <i>Performance and Compliance Report</i> (July 2016-June 2017) was obtained by the auditor. This contained the results of all of the groundwater monitoring that has been conducted at the site. There were originally 8 boreholes. A 9th hole was added to the monitoring regime in April 2009. Ground water monitoring has been attempted twice per year since October 2001 and is typically conducted in the months of October and April. There have been 32 attempts to perform groundwater monitoring over the years. In every attempt all of the bore holes have been dry. Hence, no further analysis could be performed.</p> <p>The most recently published <i>Performance and Compliance Report</i> indicates that gamma radiation monitoring is conducted at five yearly intervals. The most recent monitoring was scheduled for October 2017. The report detailing the survey was provided for review separately. The report concluded that ‘...gamma radiation</p>	Compliant

No.	Criterion	Response	Conclusion
		<p>levels in 2017 are consistent with the previous surveys and that the levels have remained constant throughout each of the radiation cell compounds’.</p> <p>The <i>Performance and Compliance Report</i> summarised the results of the Radon and thoron monitoring that was conducted in 2014. The full report detailing the measurements conducted by the RSO was obtained. The measured values ranged from <11 - 28 Bq/m³ (Radon) and <minimum detectable limit - 33 Bq/m³ (thoron¹⁷).</p> <p>The auditor is unable to identify any further exposure pathways. Hence, based upon the information described above, the Facility is judged to be compliant with this requirement.</p>	
(f)	a summary of the current rehabilitation and decommissioning plan and an indication of the expected date of closure of the facility.	<p>The arrangements for the decommissioning and rehabilitation are discussed in Section 3.3. Under that section, RHS 35 requires that draft plans for decommissioning the Facility and rehabilitating the site are to be submitted to the appropriate authority at least three years prior to the proposed date of closure. However, it is acknowledged that the <i>Ministerial Statement No. 562</i> requires the decommissioning and rehabilitation plan to be finalised 6 months prior to the closure of the Facility. Therefore, it was concluded that this requirement is not applicable to this Facility (as another arrangement is in place).</p> <p>It is observed that the Performance and Compliance Report that has been most recently produced makes a commitment to preparing a decommissioning</p>	Not applicable

¹⁷ Measurements of 40 and 47 Bq/m³ were recorded. However, in these instances the radon detector was damaged and the RSO concluded that the true result was less than the indicated value. Hence, these values were excluded from the analysis.

No.	Criterion	Response	Conclusion
		<p>statement 6 months prior to decommissioning occurring. However, this does not provide an expected date for the closure of the Facility. This is not surprising given the massive size of the site, the absence of a limit on the total amount of radioactivity to be buried at the site and the sporadic nature of the timing of the disposal campaigns. There is, however, the <i>Decommissioning and rehabilitation - B long term and site closure plan</i>. This commits to the use of recognised best practices in the area of low level radioactive waste management. The plan sets out a goal, object and targets for the rehabilitation. There is a commitment to reviewing the rehabilitation scenarios every five years, this was previously done in 2014. This plan is supported by a procedure and an instruction that provide further detail to the plan.</p>	

Appendix 7: Findings from the 2013 technical audit

Non-compliances

- Non-compliance 1. Dose constraints shall be applied to the waste disposal system to ensure that individual dose limits are not exceeded. Such constraints shall apply where individuals may be exposed to other potential, or actual, sources of radiation, excluding natural background or medical sources.
- Non-compliance 2. For waste to be acceptable for disposal, the following physical and chemical characteristics shall apply to all categories of waste...
- h. Radioactive waste contaminated with toxic, pathogenic or infectious material shall be treated or conditioned to minimise both the potential hazard to disposal site personnel and the long-term health risks to members of the public.
- Non-compliance 3. In addition to the requirements stated below, an assessment of the likely behaviour of the waste in the geochemical environment of the facility shall be made.
- Non-compliance 4. A review of the environmental management plan shall be carried out by the proponent/operator at intervals of approximately three years during the period of operation. A publicly available report detailing this review shall be provided to the appropriate authority.
- Non-compliance 5. The radiation management plan shall be reviewed by the operator at approximately three yearly intervals during the period of operation and the operator shall submit a publicly available report detailing this review to the appropriate authority.

Recommendations

- Recommendation 1. As part of the development of the safety case and safety assessment for the Facility, re-assess possible exposure scenarios due to the Facility and consider the possibility of potential sources of exposure not considered when deriving the generic activity concentration limits given in RHS35.
- Recommendation 2. Reconsider the concept of dose constraints in accordance with the definition of dose constraint given in RPS1.
- Recommendation 3. Review the historical doses incurred by workers due to the Facility and use this as the basis to set a numerical dose constraint (e.g. 5 mSv per annum) that (a) can help ensure that individual dose limits are not exceeded, and (b) assist in the optimisation process.
- Recommendation 4. Conduct the safety assessment in accordance with an established methodology (e.g. IAEA SSG-23), it is recommended that:

- the records of any past safety assessment be collected and compiled to create the basis of a new safety assessment that is further developed to comply with current best practice in the field of near-surface radioactive waste disposal;
- the institutional control period be established [or re-evaluated] by undertaking a safety assessment process as recommended in section 2.3 of RHS35;
- the activity concentration limits suitable for the operation of the Mt Walton East facility be determined through a safety assessment process (and in accordance with section 2.6.3 of RHS35);
- any safety assessment process undertaken uses site specific data and scenarios;
- the analysis of scenarios during the post-closure phase be undertaken as part of the safety assessment process and the resulting total radionuclide activity be submitted to the regulatory authority for approval;
- the mitigating factors associated with the use of the reported engineered barriers in the waste body and disposal facility be used in a safety assessment of the facility; and the safety assessment process include an assessment of possible exposure pathways. These can be used to decide upon appropriate monitoring actions during operation and post-closure of the facility.

- Recommendation 5. As part of the safety assessment, review the derivation of the activity concentration limits for specific radionuclides in accordance with section 2.6.3 of RHS35.
- Recommendation 6. As part of the safety assessment, review whether a dose constraint for members of the public should be applied. It is acknowledged that there is currently no public population nearby. However, should demographics change in the future it would be useful to have such a dose constraint in place.
- Recommendation 7. As part of the safety assessment, re-examine the limit (or lack thereof) on the total radionuclide activity for the disposal facility by performing a quantitative evaluation of exposures that might result from leaching and dispersal of radioactive contaminants by groundwater.
- Recommendation 8. Prepare documentation, if not already in existence, analysing the behaviour of the cement matrix with regard to:
- Its ability to maintain its structure under compressive loads and possible structural changes in the waste body; and
 - Its ability to comply with stability requirements and protect against inadvertent intrusion.

- Recommendation 9. The safety assessment should include an assessment of the likely behaviour of the waste in the geochemical environment of the Facility.
- Recommendation 10. Waste Acceptance Guidelines be revised to address 'toxic, pathogenic or infectious material' and 'wastes containing chelating agents', prior to any future burial campaigns.
- Recommendation 11. The safety assessment should include an analysis of the engineered barriers in the waste body and the disposal facility and the role they play in achieving the objective outlined in section 2.1 of RHS35.
- Recommendation 12. Appropriate below-ground warning markers should be put in place to help prevent inadvertent access to the waste forms.
- Recommendation 13. As part of the safety assessment, the design of the disposal trench is considered. Specifically, it should be considered whether engineered drainage should be used for future disposal trenches.
- Recommendation 14. It is recommended that an assessment of possible exposure pathways be undertaken. This can result from a safety assessment and be used to decide upon appropriate monitoring actions during operation and post-closure of the facility.
- Recommendation 15. The suitability of the environmental management plan should be reviewed approximately every three years. This review should be documented.
- Recommendation 16. The suitability of the radiation management plan should be reviewed approximately every three years. This review should be documented.