



PERFORMANCE AND COMPLIANCE REPORT

INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

JULY 2022 – JUNE 2023

September 2023



Department of Finance

PERFORMANCE AND COMPLIANCE REPORT

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST**

JULY 2022 – JUNE 2023

Prepared by Aurora Environmental

September 2023

SUMMARY

This Performance and Compliance Report (PCR) details the compliance audits of the operation of the Intractable Waste Disposal Facility (IWDF), Mt Walton East, for the period 1 July 2022 to 30 June 2023, against the requirements of:

- *Ministerial Statement No. 562;*
- *Australian Safeguards and Non-Proliferation Office (ASNO) permit;*
- *Radiological Council (RCWA) registration;*
- *Department of Water and Environmental Regulation (DWER) licence;*
- *IWDF Environmental, Health and Safety and Quality Management Plans (EHSQMP); and*
- *IWDF Environmental, Health and Safety and Quality Management Systems (EHSQMS).*

This report demonstrates that the operation of the IWDF between 1 July 2022 and 30 June 2023 complied, where applicable, with two exceptions, with the requirements of Ministerial Statement No. 562, ASNO Permit, DWER Licence, RCWA Registration and the IWDF EHSQMS and EHSQMP.

No disposal operations were undertaken during the reporting period. Ongoing management and monitoring activities including the following were undertaken during the reporting period:

- *Groundwater monitoring;*
- *Capping monitoring;*
- *Rehabilitation monitoring;*
- *Gamma radiation monitoring;*
- *Routine site inspections;*
- *Liaison with the community; and*
- *Continual review and update of the EHSQMS and EHSQMP for the IWDF.*

Reporting for all ongoing management and monitoring activities is also reported in this PCR.

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

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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.
CAR	Corrective Action Request
CEO	Chief Executive Officer of DWER
CLC	IWDF Community Liaison Committee
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 Systems
EHSRMP	Environmental, Health and Safety and Radiation Management Plans
Finance	Department of Finance - The Department of Finance is the Government agency responsible for assisting the Minister for Works in the administration of the <i>Public Works Act 1902</i> (WA).
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
MRM	Management Review Meeting
MP	Management Procedure
PCR	Performance and Compliance Report
PPE	Personal Protective Equipment

RCWA Radiological Council Western Australia

RSO Radiation Safety Officer

SDS Safety Data Sheet

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

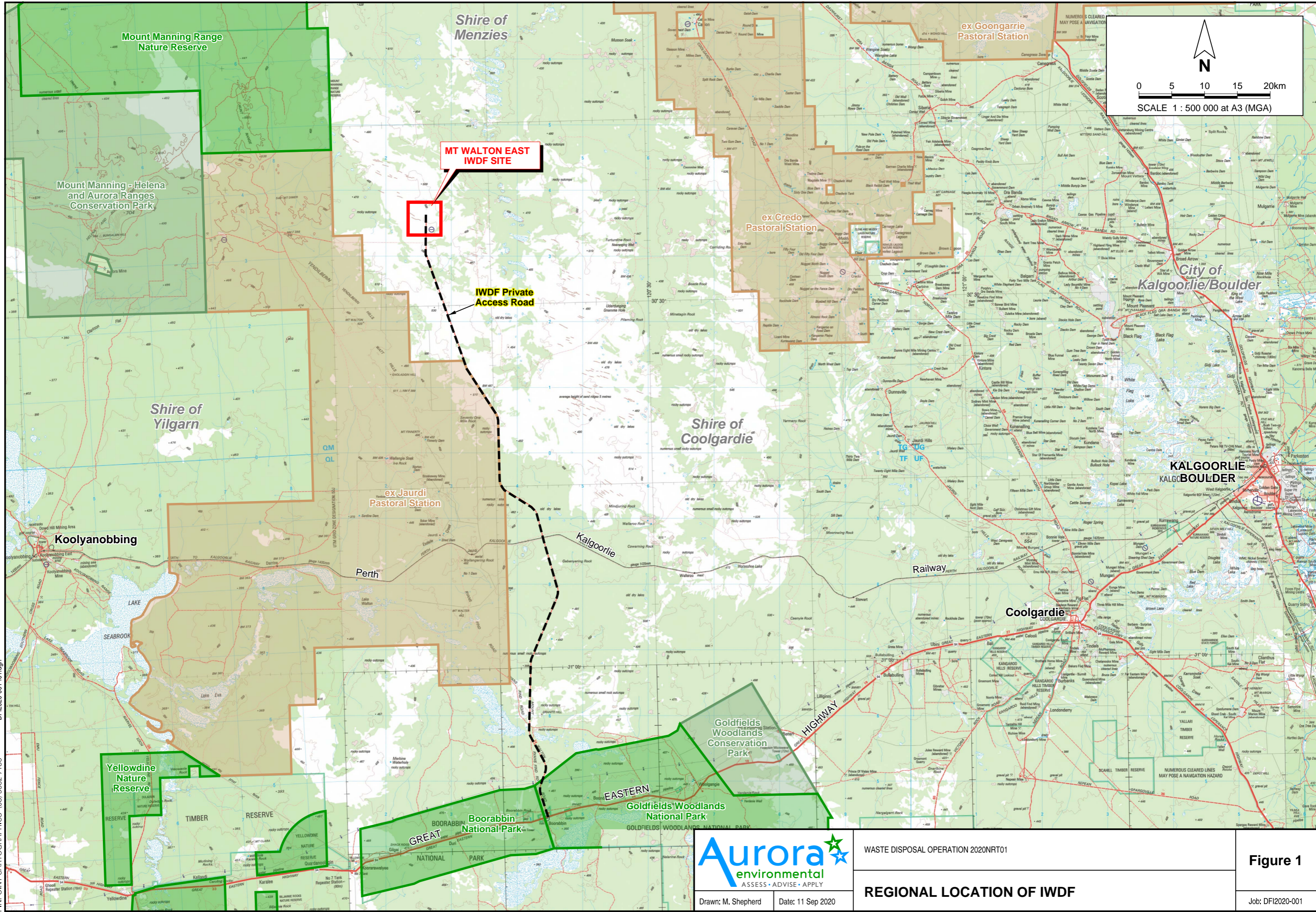
This Performance and Compliance Report (PCR) summarises the compliance of the operation of the IWDF against the requirements of:

- Ministerial Statement No. 562 (Appendix A).
- Radiological Council of Western Australia (RCWA) Registration RS 13/2011 20590 (Appendix B).
- Department of Water and Environmental Regulation (DWER) Licence L8190/2007/2 issued 16 August 2022 (Appendix C).
- Australian Safeguards and Non-proliferation Office (ASNO) Permit PN207 (Appendix D).
- IWDF Management Plans (Appendix E).
- IWDF Environmental, Health and Safety and Quality Management System (EHSQMS) procedures and other documents.
- IWDF Environmental, Health and Safety and Radiation Management Plans (EHSRMP).

In particular, the PCR has been prepared to fulfil the requirements of 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

Aurora
 environmental
 ASSESS • ADVISE • APPLY

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

From the 1 July 2022 to 30 June 2023 the proponent for the IWDF was the Minister for Works care of the Department of Finance (Finance).

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

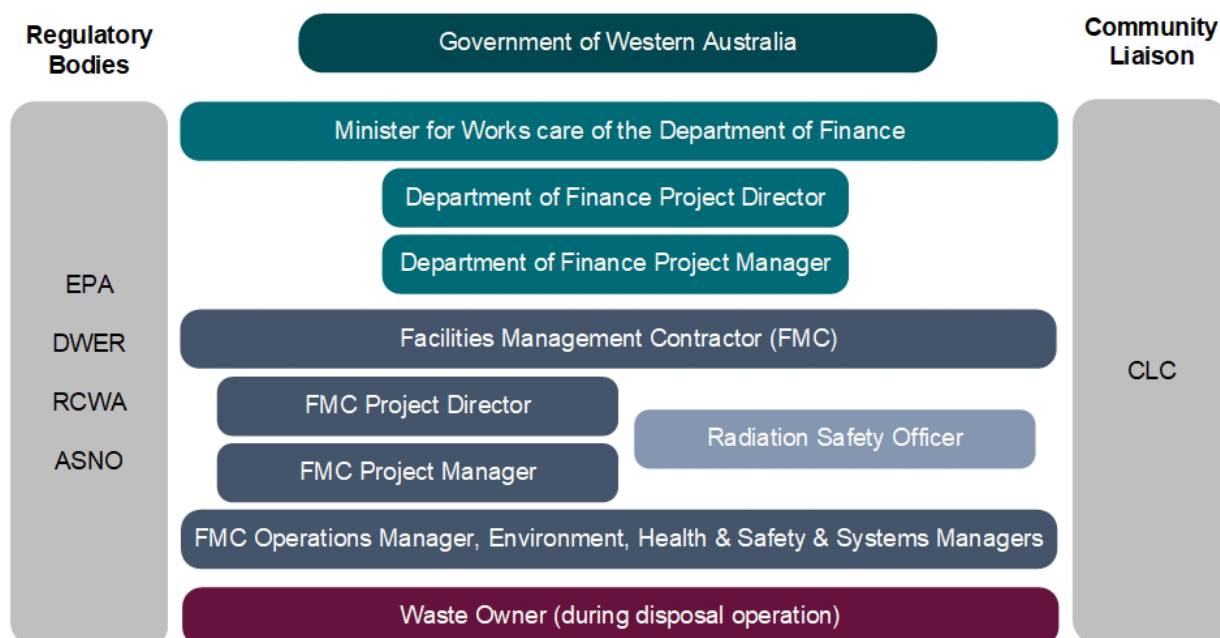
2.2 Facility Management Contractor

The Facility Management Contractor (FMC), with responsibility for the environmental and operational management of the IWDF, for the period 1 July 2022 to 30 June 2023 was Aurora Environmental.

2.3 IWDF Governance

The governance of the IWDF from 1 July 2022 to 30 June 2023 is illustrated in Figure 2 below.

Figure 2
July 2022 – June 2023 IWDF Governance Structure



2.4 Visits to the IWDF during the 2022 – 2023 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 2022 – 2023 Reporting Period

Date of Visit	Purpose of Visit	Name and Role of Visitor
13 Sep 2022	Facility inspection, scoping of maintenance and improvement works.	Stuart Whitmarsh (Deputy Director General, Buildings and Contracts, Finance), Mark Bryden (General Manager, Operations, Buildings and Contracts, Finance).
17 – 20 Oct 2022	Facility inspection, IWDF Access Road inspection, rehabilitation, gamma radiation, capping, and groundwater monitoring.	Mark Shepherd (FMC Project Director and Operations Manager), Shayne Pittaway (FMC Technician), Joshua Morgan (FMC Technician).
19 Oct 2022	Site visit to quote for fencing maintenance works.	Darcy Malone (Senior Project Officer, Finance), Alf Patroni (A.C. Patroni, fencing contractor), Jamie Patroni (A.C. Patroni, fencing contractor), Mark Shepherd (FMC Project Director and Operations Manager),
2 Nov 2022	Installation of solar lights at the entry gate.	DWE Electrical (electrician), Darcy Malone (Senior Project Officer, Finance)
11 Nov 2022	Installation of new entry gate and disposal cell fence works	Alf Patroni (A.C. Patroni, fencing contractor), Jamie Patroni (A.C. Patroni, fencing contractor), Darcy Malone (Senior Project Officer, Finance)
15 Nov 2022	Slashing of overhanging vegetation along the track to the Chemical and Radioactive Disposal Areas.	Bill and Cyrena Hanson (Yonga Djena Pty Ltd, slashing contractor), Darcy Malone (Senior Project Officer, Finance)
22 Nov 2022	KPMG Building Condition Assessment inspection	Darcy Malone (Senior Project Officer, Finance), Stephen Long (KPMG), and Abrar Prottoy (KPMG).
29 Nov 2022	CLC Meeting and IWDF site visit.	Eleanor Hopkins (Finance IWDF Project Director) Sze-Wan Ng (Finance IWDF Contract Manager) Mark Shepherd (FMC Project Director and Operations Manager), Jan McLeod (Coolgardie Community Representative), Rhonda Evans (Coolgardie Community Representative) David Williams (Community Representative – Western Australian community outside the Shires of Coolgardie, Menzies, Kalgoorlie-Boulder and Yilgarn) Phil Nolan (Councillor, Shire of Yilgarn), Bryan Close (Deputy President, Shire of Yilgarn), Mick Kinnaird (Acting Executive Manager Regulatory Services, Shire of Yilgarn), Greg Dwyer (Shire President, Shire of Menzies), Pascoe Durtanovich.(Acting Chief Executive Officer, Shire of Menzies).

Date of Visit	Purpose of Visit	Name and Role of Visitor
17 - 19 May 2023	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 DWER, under Division 3 Part V of the *Environmental Protection Act 1986*, as a Prescribed Premises - Category 66 Class V intractable landfill site.

DWER Licence L8190/2007/1 had an expiry date of 17 February 2022. Finance submitted the DWER licence renewal application for the IWDF to DWER on 16 November 2021. Given the time DWER required to assess the licence renewal application, DWER proposed to extend the expiry date by six months to 17 August 2022. Finance accepted the proposed extension, and the licence expiry date was formally extended on the 9 February 2022.

Using the information provided on the licence renewal application the DWER assessed the potential risks to the environment and public health from emissions and discharges during the operation of the IWDF. The DWER issued Revised Licence L8190/2007/2 on the 16 August 2022. The duration of Revised Licence L8190/2007/2 is from 18 August 2022 to 17 August 2042.

Revised Licence L8190/2007/2 was granted in an updated format with existing conditions updated and new conditions added. The DWER also issued a Decision Report which explains and justifies the changes made. DWER Licence L8190/2007/2 and the Decision Report is provided at Appendix C.

3.1.1 Compliance Statement

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

Table 2
Environmental Licence L8190/2007/2 2022 – 2023 Compliance Statement

No.	Condition	Compliance Status/ Comment
Infrastructure and equipment		
1.	The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding	

No.	Condition	Compliance Status/ Comment												
	<p>infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.</p> <p>Environmental Licence L8190/2007/2 Table 1: Infrastructure and equipment requirements</p> <table border="1" data-bbox="309 506 1102 1364"> <thead> <tr> <th data-bbox="309 506 569 600">Site infrastructure and equipment</th> <th data-bbox="569 506 833 600">Operational requirement</th> <th data-bbox="833 506 1102 600">Infrastructure location</th> </tr> </thead> <tbody> <tr> <td data-bbox="309 600 569 804">Groundwater monitoring bores</td> <td data-bbox="569 600 833 804">Maintain in operational condition.</td> <td data-bbox="833 600 1102 804">Bores GM1 – GM9 as depicted in schedule 1, Bore location map and any future bores</td> </tr> <tr> <td data-bbox="309 804 569 1126">Surface water management system</td> <td data-bbox="569 804 833 1126">Ensure excavated V drains are maintained around cells, to aid surface drainage away from the water shedding clay dome.</td> <td data-bbox="833 804 1102 1126">N/A</td> </tr> <tr> <td data-bbox="309 1126 569 1364">Security fencing</td> <td data-bbox="569 1126 833 1364">Ensure fencing for the demarcation of cells is maintained free of holes, breaks and other defects.</td> <td data-bbox="833 1126 1102 1364">N/A</td> </tr> </tbody> </table>	Site infrastructure and equipment	Operational requirement	Infrastructure location	Groundwater monitoring bores	Maintain in operational condition.	Bores GM1 – GM9 as depicted in schedule 1, Bore location map and any future bores	Surface water management system	Ensure excavated V drains are maintained around cells, to aid surface drainage away from the water shedding clay dome.	N/A	Security fencing	Ensure fencing for the demarcation of cells is maintained free of holes, breaks and other defects.	N/A	<p>In compliance - All monitoring bores were in operational condition and did not require maintenance during the reporting period. See Appendix F for groundwater monitoring reports.</p> <p>In compliance - All V drains around cells were routinely inspected during the site monitoring visits Oct 2022 and May 2023. See section 3.1.2.1 for further discussion. V drains for Cell 97NRT01 can be seen in section 3.1.2.2.</p> <p>In compliance – maintenance for minor defects was completed November 2022. See section 3.1.2.2 of this PCR for further discussion.</p>
Site infrastructure and equipment	Operational requirement	Infrastructure location												
Groundwater monitoring bores	Maintain in operational condition.	Bores GM1 – GM9 as depicted in schedule 1, Bore location map and any future bores												
Surface water management system	Ensure excavated V drains are maintained around cells, to aid surface drainage away from the water shedding clay dome.	N/A												
Security fencing	Ensure fencing for the demarcation of cells is maintained free of holes, breaks and other defects.	N/A												
Waste acceptance and disposal														
2.	The Licence Holder must only accept onto the premises of a waste type and waste description in accordance with the requirements of Ministerial Statement (MS) 562.	N/A No disposal operation occurred during the reporting period therefore no waste was accepted onto the premises.												
3.	The Licence Holder must immediately recover or remove and dispose of spills of intractable waste outside of the disposal cells.	N/A No disposal operation occurred during the reporting period therefore no												

No.	Condition	Compliance Status/ Comment						
		spills of intractable waste occurred.						
4.	The Licence Holder must ensure that Emergency Response Equipment is located on the premises for the duration of a waste disposal operation.	N/A No disposal operation occurred during the reporting period.						
Stormwater management								
5.	The Licence Holder must ensure that bunding is constructed to ensure that stormwater is diverted from areas of the premises where waste is handled or stored.	N/A No disposal operation occurred during the reporting period.						
Monitoring								
6.	<p>The Licence Holder must record the total amount of waste accepted onto the premises or removed from the premises for each waste type listed in Table 2, with the corresponding parameters listed in Table 2, and for each corresponding time period set out in Table 2.</p> <p>Environmental Licence L8190/2007/2 Table 2: Waste accepted onto or removed from the premises.</p> <table border="1" data-bbox="309 1178 1102 1881"> <thead> <tr> <th data-bbox="309 1178 464 1274">Waste Type</th> <th data-bbox="464 1178 932 1274">Parameter</th> <th data-bbox="932 1178 1102 1274">Time Period</th> </tr> </thead> <tbody> <tr> <td data-bbox="309 1274 464 1881">Intractable Wastes</td> <td data-bbox="464 1274 932 1881"> (a) Time and date of delivery; (b) Waste type; (c) Total quantity of waste package (in kilograms, tonnes, litres or cubic metres); (d) The name of the waste generator; (e) The origin and source location of waste; (f) The physical, chemical, and/or radiological characteristics of the waste; (g) The name and contact details of the company transporting the waste to the premises; and </td> <td data-bbox="932 1274 1102 1881">Each load arriving at the premises.</td> </tr> </tbody> </table>	Waste Type	Parameter	Time Period	Intractable Wastes	(a) Time and date of delivery; (b) Waste type; (c) Total quantity of waste package (in kilograms, tonnes, litres or cubic metres); (d) The name of the waste generator; (e) The origin and source location of waste; (f) The physical, chemical, and/or radiological characteristics of the waste; (g) The name and contact details of the company transporting the waste to the premises; and	Each load arriving at the premises.	N/A No disposal operation occurred therefore no intractable waste was accepted or removed from the premises during the reporting period.
Waste Type	Parameter	Time Period						
Intractable Wastes	(a) Time and date of delivery; (b) Waste type; (c) Total quantity of waste package (in kilograms, tonnes, litres or cubic metres); (d) The name of the waste generator; (e) The origin and source location of waste; (f) The physical, chemical, and/or radiological characteristics of the waste; (g) The name and contact details of the company transporting the waste to the premises; and	Each load arriving at the premises.						

No.	Condition	Compliance Status/ Comment
	(h) The name of the driver and registration number of the delivery vehicle.	
Records and reporting		
7.	<p>The Licensee shall notify the CEO (Chief Executive Officer) in writing at least 1-month prior¹ to the delivery of waste to the Intractable Waste Disposal Facility, Mt Walton East. The following information shall be included in the notification (where known):</p> <ul style="list-style-type: none"> (a) Waste type(s) and quantities to be disposed; (b) Disposal dates; and (c) Status of approval under MS 562 and the <i>Radiological Safety Act 1975</i>. <p>Note1: In the case of an emergency disposal event, where notice of disposal is not able to be provided to the CEO within the timeframe outlined in condition 7, the Licence Holder shall provide notification to the CEO as soon as possible (and no later than the end of the next working day) after becoming aware of the emergency disposal event.</p>	N/A No disposal operation occurred therefore no intractable waste was delivered during the reporting period.
8.	<p>The Licence Holder must maintain accurate and auditable books including the following:</p> <ul style="list-style-type: none"> (a) any maintenance of infrastructure that is performed in the course of complying with condition 1 of this licence; (b) monitoring undertaken in accordance with condition 6 of this licence; and (c) complaints received under condition 10 of this licence. 	<p>In compliance</p> <ul style="list-style-type: none"> (a) Fencing maintenance – see section 3.1.2.2 of this PCR. (b) N/A no disposal occurred. (c) N/A no complaints received during annual period
9.	<p>The books specified under condition 8 must:</p> <ul style="list-style-type: none"> (a) be legible; (b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval; (c) be retained by the Licence Holder for the duration of the licence; and (d) be available to be produced to an inspector or the CEO as required. 	<p>In compliance – the records, information, reports, and data required by the licence with respect to infrastructure maintenance (fencing) is recorded at 3.1.2.2 of this PCR.</p>

No.	Condition	Compliance Status/ Comment				
10.	<p>The Licence Holder must record the following information in relation to complaints received by the Licence Holder (whether received directly from a complainant or forwarded to them by the Department (DWER) or another party about any alleged emissions from the premises:</p> <ul style="list-style-type: none"> (a) the name and contact details of the complainant (if provided); (b) the time and date of the complaint; (c) the complete details of the complaints and any other concerns or other issues raised; and (d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint. 	N/A No complaints were received during the reporting period.				
11.	<p>The Licence Holder must:</p> <ul style="list-style-type: none"> (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and (b) prepare and submit to the CEO by no later than 90 days after the end of that annual period and Annual Audit Compliance Report in the approved form. 	<p>This table (Table 2) is evidence of the audit required by Condition 11 (a).</p> <p>The Annual Audit Compliance Report has been prepared however submission was not required during this reporting period. Compliance with the submission requirements will be reported in the 2023 - 2024 PCR.</p>				
12.	<p>The Licence Holder must submit to the CEO by no later than 90 days after the end of each annual period, an Annual Environment Report for that annual period for the conditions listed in Table 3, and which provided the information in accordance with the corresponding requirement set out in Table 3.</p> <p>Environmental Licence L8190/2007/2 Table 3: Annual Environmental Report</p> <table border="1" data-bbox="309 1659 1102 1890"> <thead> <tr> <th data-bbox="309 1659 464 1722">Condition</th> <th data-bbox="464 1659 1102 1722">Requirement</th> </tr> </thead> <tbody> <tr> <td data-bbox="309 1722 464 1890">-</td> <td data-bbox="464 1722 1102 1890">A summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the previous annual period and any action taken.</td> </tr> </tbody> </table>	Condition	Requirement	-	A summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the previous annual period and any action taken.	<p>With agreement from DWER this PCR report meets the requirements of the Annual Environment Report. See section 3.1.2 for further discussion.</p>
Condition	Requirement					
-	A summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the previous annual period and any action taken.					

No.	Condition		Compliance Status/ Comment
	NA	Any Performance and Compliance Reports relating to the disposal of waste which were prepared during the previous annual period.	See Section 3.1.2 below.
	Table 1	An updated map showing monitoring bore locations and designations where changes to bore infrastructure has occurred during the previous annual period.	
10		A summary of complaints received during the previous annual period.	

3.1.2 DWER License Annual Environment Report

3.1.2.1 Surface Water Management System

No maintenance of the V drains was required during the reporting period, if maintenance to the V drains was required, it would have been noted on the Site Visit Checklist (Appendix G). For clarity in future reporting, it has been agreed that the Site Visit Checklist (IWDF Form 52) will be updated to specifically include reference to the V drains in the monitoring section.

3.1.2.2 Security Fencing

During the reporting period minor maintenance to fencing around some disposal cells occurred. This minor maintenance is detailed below.

Disposal Cell 94NRT01

For Disposal Cell 94RT01 new gates were installed to reduce the gap between the double gates and to raise them slightly to allow them to be opened more easily.



Disposal Cell 94RT01 Gates Before and After Maintenance

Disposal Cell 97NRT01

On the south end of 97NRT01 the fence was re-tensioned, and a corner support was replaced. The photographs below show the work to be completed. There is no photograph of the work completed.



Disposal Cell 97NRT01 South End Prior to Maintenance

Disposal Cell 97NRT02

On the west side of Disposal Cell 97NRT02 a bent fence post was replaced and punctured fencing wire was repaired as shown in the before and after photographs below.



97NRT02 Disposal Cell Fencing Prior to Maintenance

After Maintenance

Disposal Cell 2008RT01

For disposal Cell 2008RT01 the gap between the double gates was reduced.



Disposal Cell 2008RT01 Gates Prior to Maintenance After Maintenance

3.1.2.3 Failure or Malfunction of Pollution Control Equipment

Requirement

A summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the previous annual period and any action taken.

Response

No failure or malfunction of pollution equipment or other incidents occurred during the reporting period.

3.1.2.4 Performance and Compliance Reports Relating to the Disposal of Waste

Requirement

Any Performance and Compliance Reports relating to the disposal of waste which were prepared during the previous annual period.

Response

Not required as there was no waste disposal during the reporting period. It should be noted that a Performance and Compliance Report is prepared annually by the proponent irrespective of whether a disposal operation has occurred.

3.1.2.5 Condition 1 Table 1 Infrastructure

Requirement

An updated map showing monitoring bore locations and designations where changes to bore infrastructure has occurred during the previous annual period.

Response

Not required as no changes to bore infrastructure occurred.

3.1.2.6 Condition 10 Summary of Complaints**Requirement**

A summary of complaints received during the previous annual period in relation to any alleged emissions from the premises.

Response

No complaints were received during the reporting period.

3.2 Contaminated Sites Act 2003 IWDF Classification

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 about 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.

RCWA registration RS 13/2011 20590 for the registration period 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.

As the RCWA registration was due to expire on the 8 February 2023 Finance submitted to the RCWA, on 31 January 2023, an application for Renewal of Registration of Premises for the IWDF, Mt Walton East.

As at the 30 June 2023 the RCWA had not yet issued a new registration for the IWDF. However, representatives of RCWA have stated that, under the *Radiation Safety Act 1975*,

and as the renewal application was submitted prior to expiry the current registration would remain in force until a new registration is issued by RCWA. RCWA registration RS 13/2011 20590 is included as Appendix B.

3.4.1 Compliance Statement

Table 3 details Finance's compliance, for the reporting period, 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 2022 – 2023 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> .	General information.

<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>Disposal of radioactive waste did not occur during the reporting period.</p> <p>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>Disposal of radioactive waste did not occur during the reporting period.</p> <p>Disposal of radioactive waste did not occur during the reporting period.</p> <p>In compliance – an Environmental Gamma Radiation Survey was undertaken 18 and 19 Oct 2022, the Report (Appendix H) was completed 22 Dec 2022 and submitted to RCWA 9 Jan 2023. RCWA were provided with copies of updated radiation safety management procedures.</p> <p>In compliance – the Finance R&D Schedule refer to the IWDF records that are to be retained permanently within the State Records Office of Western Australia. See Appendix I 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>
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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>For evidence 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 	<p>In compliance – all documents listed are specified on the Finance R&D schedule. See Appendix I for extract of Finance R&D Schedule.</p>

Conditions, Restrictions and Limitations	Compliance Status / Comment
<ul style="list-style-type: none"> • 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. 	
<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 – an 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.

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 the 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.

Permit PN207 (Appendix D) requires Finance to submit to ASNO a report describing approved building(s)/location(s) and report an inventory of all nuclear material. As of 2018, the annual inventory report must be submitted online via the NUMBAT database portal.

3.5.1 Compliance Statement

Table 4 details compliance with the reporting requirements of permit PN207 for the reporting period.

Table 4
ASNO Permit PN207 2022 – 2023 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 the 3 June 2022 – see Appendix J for ASNO acknowledgement of submission.</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 of 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 the 23 February 2023. See Appendix K 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, with one exception, in compliance, where applicable, with the requirements of Ministerial Statement 562 (Appendix A).

The proponent was non-compliant with *Proponent Commitment 8 Community Liaison* which requires the proponent to convene a minimum of four meeting each year. For this reporting period only three meetings were held. At the 14 October 2021 Community Liaison Committee (CLC) meeting, the CLC agreed to convene a minimum of three meetings a year instead of four.

Finance previously met with Environmental Protection Authority (EPA) Services to discuss the reduction of CLC meetings from a minimum of four meetings to a minimum of three meetings per year. EPA Services advised that a formal request for amendment would need to be submitted to the EPA for assessment. On the 2 May 2023, a s 45C, under the

Environmental Protection Act 1986, regarding the CLC and other aspects was submitted to the regulator for assessment.

**Table 5
Statement 562 Ministerial Conditions and Proponent Commitments 2022 – 2023 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	In compliance	The Minister for Environment issued a Notice of Revocation of a Proponent and Notice of Nomination as Proponent, under Section 38I of the <i>Environmental Protection Act 1986</i> , on the 21 January 2022, approving a change of proponent.
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.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
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.
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	Not required	As a disposal operation did not occur during the reporting period submission of the 2022-2023 PCR to the EPA is not required. The 2022-2023 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.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
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		Noted.
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 EHSQMS.
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.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
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 the Environmental Management Program.
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 be 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.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
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.
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	RCWA	Approved Environmental Management Plan	In progress	A preliminary Operational Decommissioning and Rehabilitation Management Plan which addresses operation specific decommissioning and rehabilitation issues was approved on 23 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
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.
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.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 4.6	Operational Guidelines	<p>Make the draft Operational Guidelines required by commitments 4.1 to 4.5 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 EPA finalising its consideration of the Plan.</p>	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.
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.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
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.
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	Not required during reporting period	No disposal operation occurred during reporting period.
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	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 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	Not required during reporting period	No disposal operation occurred during reporting period.
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	Non-compliance	CLC meetings were held on 29 November 2022, 16 February, and 29 June 2023. See Appendix L for minutes of CLC meetings. It should be noted that the minutes for the CLC meeting held 29 June 2023 have not been included as they are not yet finalised by the CLC however the draft minutes have been sighted by the auditor.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
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 sign posted after each disposal operation and each cell continues to be fenced and sign posted. Fencing can be seen in Section 3.1.2 of this PCR, Appendix M October 2022 Rehabilitation Monitoring report and Appendix N October 2022 Capping Monitoring Report.
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 are 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, environment and safety 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 management and operational activities of the IWDF.

4.2 Management Manuals and Procedures

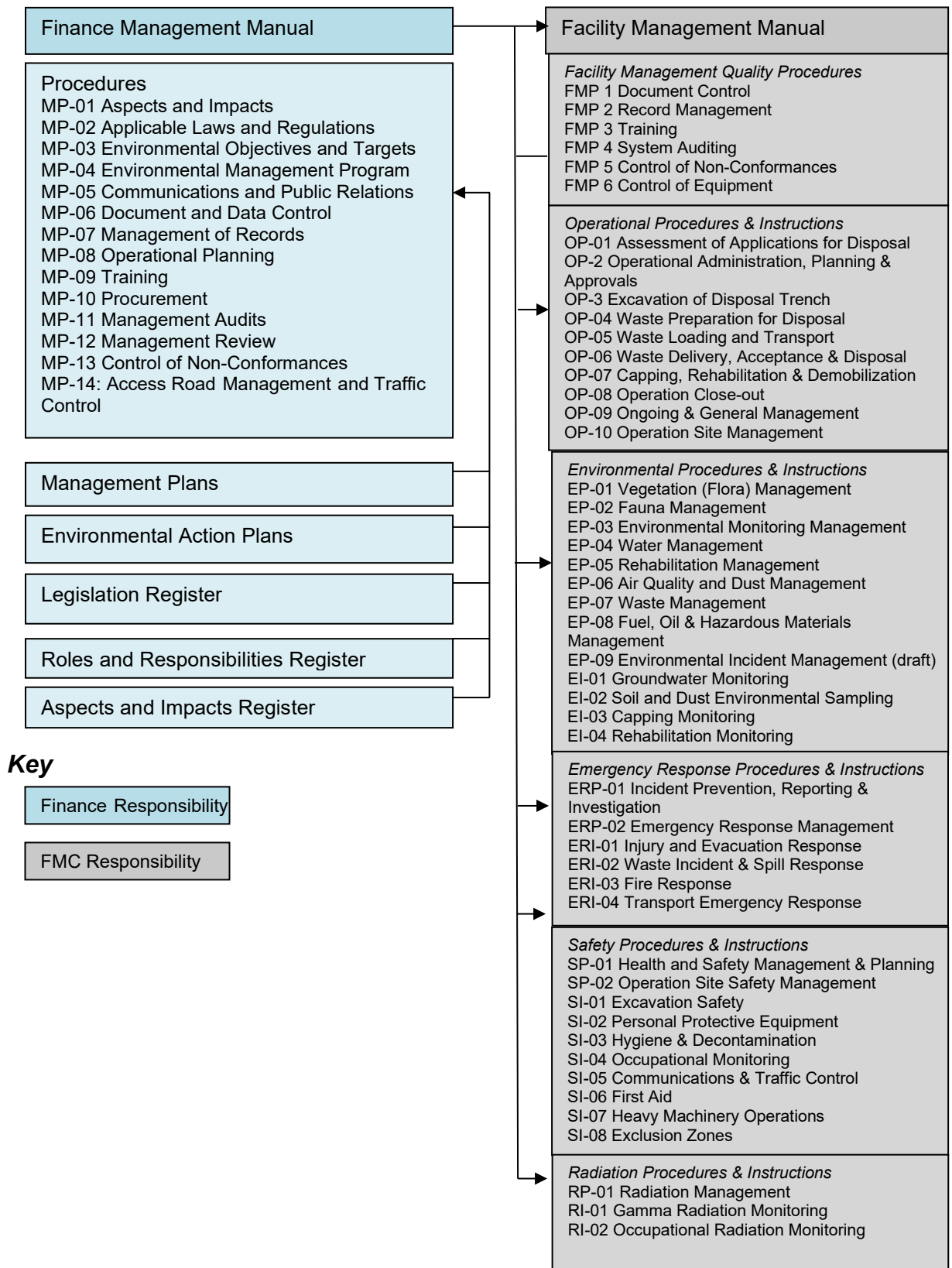
There are two management manuals which contain essential information about the management of the IWDF and provide an overview of the systems; these two manuals are provided as Appendix O and are described below.

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 below 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.

MP-14 Access Road Management and Traffic Control has not been audited as it primarily deals with the IWDF Access Road which is outside the scope of the IWDF.

Two non-compliances were recorded for the reporting period.

Non-compliance 1

MP-08 requires the proponent to hold CLC meetings at least four times per year. For the reporting period three CLC meetings were held on the 29 November 2022, 16 February 2023, and 29 June 2023.

It should be noted that at the 14 October 2021 CLC meeting the CLC agreed to hold meetings three times a year unless activities at the IWDF, such as a disposal operation, require an increase in meeting frequency.

A s.45C under the *Environmental Protection Act 1986* was submitted to the Department of Water and Environmental Regulation on 2 May 2023 regarding the CLC and other administrative changes to Ministerial Statement 562. Until Ministerial Statement 562 is modified the requirement to hold at least four meetings per year will remain in MP-08.

Non-compliance 2

MP-09 requires that all training has been recorded on a Training Record sheet and kept on file.

Review of the FMC or Finance Training Register and Schedule confirmed that all training has not been recorded and kept on file for the audit period.

Note: after the audit period, the Training Register has since been updated and is now compliant.

Table 6
Finance Environmental, Health and Safety and Quality Management System 2022 - 2023 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	The Aspects and Impacts Register addresses environmental, health and safety, socio-political and legal aspects. See Appendix P for 2022 - 2023 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	The Aspects and Impacts Register addresses all required aspects. See Appendix P.
4.3	Each aspect / impact has been assigned a likelihood and consequence value.	In compliance	Review of the Aspects and Impacts Register demonstrated 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	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	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	The register was reviewed in October 2022 by FMC Project team. It was verified that all significant aspects of

Section	Requirement	Status	Evidence / Comment
			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 October 2022. 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.	Partial compliance	The register was compiled in 2000. There is evidence that the relevant regulatory authorities, site conditions and commitments have been consulted 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	Review of legislation 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 registers were reviewed in November 2022. 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 Commonwealth legislation • Western Australian Legislation. 	In compliance	Review of IWDF document library demonstrated that legislation updates were retrieved from all available sources.

Section	Requirement	Status	Evidence / Comment
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.
4.3	Obsolete copies of legislation are removed from the document library.	In compliance	A review of the legislation folder in the document library demonstrated that the superseded versions of legislation are deleted.
4.3	The implications of new or amended legislation have been determined and presented at a Management Review Meeting.	In compliance	The impact of the new <i>Aboriginal Cultural Heritage Act 2021</i> was reported at the June 2023 Management Review Meeting. See Appendix R for Minutes of MRM.
4.4	Proposed changes to applicable requirements or the establishment of new legislation applicable to the management of the IWDF shall be tracked to ensure Finance: <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 Systems Manager who updated Finance at monthly management meetings and management review meetings. See Appendix R for minutes of Management Review Meetings.
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	Review of the management objectives as documented in the management plans confirmed that the environmental and health and safety policy and significant aspects and impacts have been considered in the development of 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 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	Review confirmed that 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 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 S for 2022 -2023 Action Plans
4.3.2	Improvement targets are detailed in the action plans.	In compliance	See Appendix S for 2022 – 2023 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 required elements. See Appendix E.

Section	Requirement	Status	Evidence / Comment
4.4	Action plans contain a policy aim, improvement target, improvement objective, action requirements, responsible personnel, completion date and records of achievement.	In compliance	Review of action plans confirmed that each plan details the required elements. See Appendix S for 2022 - 2023 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 December 2022, and June 2023. See Appendix E.
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 (Management Review Meeting), held 15 December 2022 and 13 Jun 2023. 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. Progress towards achievement was reported at Management Review Meetings. See Appendix R.
Procedure: MP-05 Communications and Public Relations			
5.3	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 the appropriate delegated signatory.
5.3.1	All written communications are recorded in a manner consistent with MP-06	In compliance	Review of critical communication confirmed that all written communications were recorded in a manner consistent with MP-06.
5.3.2	All verbal communication, whether meetings or telephone conversations, if deemed quality critical, shall be recorded in the minutes of the meeting	In compliance	Review confirmed that verbal communication, where quality critical, is recorded.

Section	Requirement	Status	Evidence / Comment
	or meeting notes or recorded on file note. These records shall then be filed, and appropriate action undertaken.		
5.4	Complaints have been investigated, non-conformance recorded, and the complaint entered onto the complaints register.	N/A	No complaints were received during reporting period.
5.5	Large-scale external communications have been referred to the IWDF Project Director.	In compliance	Large-scale external communications such as the s45C submission was reviewed by the Project Director prior to submission.
5.5	Media releases have been developed in consultation with public affairs.	In compliance	No significant media releases were developed during reporting period, all advertisements during the reporting period were 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	Review confirmed that all Finance documents have been managed as specified in the document control matrix.
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.
4.4	Controlled documents have been distributed according to the Document Control Matrix.	In compliance	Review confirmed that controlled documents created during the reporting period have been added to the Document Control Matrix. See Appendix T for Document Control Matrix.
4.4	If a 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

Section	Requirement	Status	Evidence / Comment
			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.	Partial compliance	Inspection confirmed that all controlled documents are held at the location specified in the Document Control Matrix. Password protection of final versions of documents is no longer implemented given the current version control systems in place, it is recommended that the password protection requirement is removed.
4.5	The Document Control Matrix details the document preparer, reviewer, approver, controller, and location for each document.	In compliance	All required aspects are detailed. See Appendix T for the 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 archived forms, include a revision number in the footer – there are too many documents to be included as evidence.
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 the reporting period, however all external documents such as legislation, standards and codes of practice were reviewed during the review of the Legal and Other Requirements Register.
4.8	Master copies of documents have been stored in the correct location, as outlined in Document Control Matrix	In compliance	Review confirmed all master copies are stored in electronic format in the appropriate folder on the FMC or

Section	Requirement	Status	Evidence / Comment
			Finance server and are saved to Finance’s records management system.
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 critical correspondence is included in the Finance Records Management System.
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; • 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.</p>	In compliance	See comment above

Section	Requirement	Status	Evidence / Comment
	A copy of all outgoing correspondence shall be placed on the appropriate file.		
4.3	<p>All incoming and a copy of all outgoing communication, including letters, critical emails, faxes, reports, and where required, 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 the Department of Finance Record Keeping Policy.</p>	In compliance	The Finance Project Director has verbally confirmed communications are appropriately stored.
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 Finance backup routine.
4.4	Archiving & Storage of Records		
4.4.1	<p>Identifying Documents for Archiving</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; • Audit and review records; • Monitoring data; • Details of non-conformances; and • Public information/record. 	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 I for extract of IWDF records from R&D Schedule.

Section	Requirement	Status	Evidence / Comment
	<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 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 I for extract detailing IWDF records from R&D Schedule. See Appendix R MRM Minutes Jun 2023 Section 4.8 for evidence of annual R&D Schedule review.</p>
4.4.3	<p>Establishing Retention Periods 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. <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>	In compliance	<p>The Department of Finance Retention and Disposal Schedule (approved by State Records March 2014) contains appropriate retention periods. See Appendix I for extract detailing IWDF records from R&D Schedule.</p>

Section	Requirement	Status	Evidence / Comment
4.4.4	<p>Storage of Records</p> <p>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 the State Records Office.</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. As almost all the IWDF records are now in electronic format they continue to be held by the RCWA and Finance.</p>
4.4.5	<p>Legal Deposit</p> <p>Finance is required to comply with the <i>Legal Deposit Act 2012</i> and deposit the following documents within the State Library of Western Australia:</p> <ul style="list-style-type: none"> • Annual PCR • IWDF Handbook (as updated) • IWDF 2-page brochure (as updated). 	N/A	<p>On agreement with the State Library the required deposit of documents will occur when the 2020 – 2021 PCR is finalised. The 2021-2022 PCR was not finalised until the 27 June 2023 therefore the Legal Deposit of the required documents will occur during the next reporting period. See also Appendix R Section 3.2 June 2023 MRM Minutes.</p>

Section	Requirement	Status	Evidence / Comment
	<p>All relevant documents shall be assessed by the responsible person for clarity and completeness prior to submission to the State Library of Western Australia.</p> <p>Relevant documents should be provided to the State Library of Western Australia annually.</p>		
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	Review of the IWDF Waste Inventory Database demonstrated that all required information is available.
Procedure: MP-08 Operational Planning			
5.1	<p><i>Inquiry and Initiation</i></p> <p>An information package containing waste acceptance guidelines, Waste Proforma and background information has been sent to all potential waste disposers.</p>	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.
5.1	A completed Waste Proforma has been provided by all waste disposers and forwarded to FMC and RSO.	In compliance	Review of waste enquiry folder managed by the FMC confirmed no new Waste Acceptance Proformas were completed submitted during reporting period however updated Waste Acceptance Proformas have been forwarded to the FMC and RSO for review.
5.1	A non-refundable deposit and signed waste disposal agreement has been received from all waste disposers.	N/A	No disposal operation occurred during the reporting period.
5.2	<i>Operational Administration, Planning and Approvals</i>	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	Weekly project planning meetings have been held during disposal operations.		
5.2	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 the reporting period.
5.3	<p>Excavation of Trench and Waste Preparation</p> <p>The condition of the access road has been determined and maintenance organised.</p>	N/A	<p>No disposal operation occurred during the reporting period.</p> <p>However, see Appendix U for October 2022 and May 2023 Access Road condition reports required during ongoing management of the IWDF.</p>
5.3	Inspections of waste packaging have been undertaken.	N/A	No disposal operation occurred during reporting period.
5.3	If required, the 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.
5.4	<p>Waste Loading and Transport</p> <p>An inspection of the waste loading process has been completed.</p> <p>Where, under the contract, Finance undertakes the transport of waste, then the FMC shall organise transporters, develop the transport procedures, and driver training, in accordance with Operational Procedure OP-05 Waste Loading and Transport.</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.5	<p>Waste Placement and Acceptance</p> <p>An audit of the operation's compliance with environmental, health and safety and emergency response operational procedures has been undertaken.</p>	N/A	No disposal operation occurred during reporting period.
5.5	Certificates of acceptance have been sent to waste disposers.	N/A	No disposal operation occurred during reporting period.
5.6	<p>Capping and Rehabilitation</p> <p>The FMC shall be responsible for ensuring the trench is capped, rehabilitated, and fenced in accordance with Operational Procedure OP-07 Capping, Rehabilitation and Demobilisation.</p>	N/A	No disposal operation occurred during reporting period.
5.7	<p>Project Close Out and Completion</p> <p>A performance and compliance report has been submitted to the EPA.</p>	N/A	No disposal operation occurred during reporting period.
5.7	A copy of the approved Performance and Compliance report has been forwarded to the CLC and waste disposers.	N/A	No disposal operation occurred during reporting period.
5.7	Certificates of disposal have been sent to each waste owner.	N/A	No disposal operation occurred during reporting period.
5.7	A copy of the Performance and Compliance report has been retained for archiving.	In compliance	Although there was no disposal, as required by the Department of Finance Retention & Disposal Schedule (approved March 2014), a copy of the 2021 – 2022 PCR has been retained for archiving.
5.8.1	Ongoing Management	In compliance	Access road inspection occurred October 2022, and May 2023. See Appendix U for road inspection records.

Section	Requirement	Status	Evidence / Comment
	The IWDF access road has been inspected every six months.		
5.8.2	Reports on the condition of the access road have been completed and forwarded to Finance.	In compliance	Access road inspection occurred October 2022, and May 2023 and were forwarded to Finance with the next monthly reporting. See Appendix U.
5.8.3	Ongoing groundwater and radiation monitoring have been undertaken.	In compliance	Groundwater monitoring was completed in October 2022, and May 2023. See Appendix F for groundwater monitoring records. Radiation monitoring was completed in October 2022. See Appendix H for Environmental Gamma Radiation Survey report.
5.8.4	Community Liaison Committee meetings have been held at least four times per year.	Non-compliance	CLC Meetings were held 29 November 2022, 16 February 2023, and 29 June 2023. See Appendix L for CLC meeting minutes. It should be noted that the minutes for the CLC meeting held 29 June 2023 have not been included as they are not yet finalised by the CLC however the draft minutes have been sighted by the auditor.
5.8.5	A representative of Finance shall attend all meetings and act as the Chairperson. A representative of the FMC shall attend all meetings.	In compliance	A Finance representative attended all CLC meetings and acted as chairperson. A representative of the FMC attended all CLC meetings. See Appendix L for CLC meeting minutes. It should be noted that the minutes for the CLC meeting held 29 June 2023 have not been included as they are not yet finalised by the CLC however the draft minutes have been sighted by the auditor.

Section	Requirement	Status	Evidence / Comment
Procedure: MP-09 Training			
4.2	<p><i>New Employee Induction</i></p> <p>All new Finance personnel involved with the management of the IWDF must attend IWDF specific training sessions.</p> <p>These shall include, but not be limited to;</p> <ul style="list-style-type: none"> • discussions on the IWDF; and • briefings on the management system. <p>The briefings on the management system shall provide details on;</p> <ul style="list-style-type: none"> • the requirements of the management system; • the importance of complying with the management system; • the potential environmental impacts of their position; and • how to incorporate this knowledge into their daily work practices. 	N/A	No specific IWDF management system training was provided during the reporting period.
4.3	<p><i>Identification of Training Requirements</i></p> <p>A competency plan has been developed for each position</p>	In compliance	Finance undertakes Professional Development Plan assessments with staff, three times every twelve months, that reviews competency against the requirements and deliverables of the role. The IWDF Project/Contract Manager role also has a distinct Job Description Form (JDF) that applicants are assessed against before being deemed suitable to undertake the role.
4.3	A training schedule has been developed based on the competency plans.	N/A	See above.
4.3	Prior to visiting the IWDF Finance personnel must complete the General Safety Induction as required by FMC Procedure FMP – 03.	In compliance	Auditor sighted training form 32 for five Finance personnel who received General Induction Safety Training for visitors to the IWDF on 29 August 2022.

Section	Requirement	Status	Evidence / Comment
4.4	<p>Review of Training Requirements</p> <p>Annual training reviews have been completed for each staff member.</p>	In compliance	Finance undertakes Professional Development Plan assessments with staff, three times every twelve months, that reviews competency against the requirements and deliverables of the role.
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	<p>IWDF Contracted Employees Training Requirements</p> <p>The qualifications of contractors to Finance shall be confirmed prior to appointment, as part of the tender selection process and in accordance with MP-10 Procurement.</p> <p>The specific qualifications and training requirements needed to undertake the work shall be detailed in the tender document.</p>	N/A	No open tender process occurred during the reporting period.
4.5	<p>Finance will provide the FMC and other contractors (as necessary) training on the IWDF Management Systems after major changes or revisions to the system.</p> <p>It is the responsibility of the contractors to ensure that their employees and sub-contractors are appropriately trained and qualified to undertake the requirements of the IWDF Management Systems.</p>	In compliance	The IWDF Project Director confirmed all contractors received appropriate training.
4.6	<p>Training Records</p> <p>All training has been recorded on a Training Record sheet and kept on file.</p>	Non-compliance	Review of the FMC or Finance Training Register and Schedule confirmed that all training has not been recorded.

Section	Requirement	Status	Evidence / Comment
Procedure: MP-10 Procurement			
6.1	<p>Conflicts of Interest</p> <p>All staff involved in a procurement for the IWDF must declare any conflicts of interest (whether actual, potential or perceived) to the Finance IWDF Project Director as soon as they become known.</p> <p>For procurements with an estimated value of \$50,000 or more including GST, staff must complete a Declaration of Confidentiality and Interest Form prior to the commencement of a procurement process and submit the form to the Finance IWDF Project Director. For procurements valued less than \$50,000 including GST, conflicts of interest must be declared, including nil conflicts, on presentation of quotes to the Finance IWDF Project Director.</p> <p>If there are any changes to conflicts of interest throughout the procurement process, this should be declared as soon as they are known.</p>	N/A	<p>The IWDF Project Director confirmed there were no conflicts of interest declared for procurements valued less than \$50,000.00.</p> <p>There were no procurements valued at \$50,000.00 or more.</p>
6.2	<p>Recordkeeping</p> <p>It is a requirement to maintain a level of documentation commensurate with the scale, scope, value and risk of the procurement, capturing evidence of agreements made with suppliers, including during contract management activities.</p>	In compliance	Documentation has been sighted by the auditor showing that Finance has maintained a level of documentation that is commensurate with the scale, value, and risk of the procurement, capturing evidence of agreements made with suppliers, including during contract management activities.
7.1	<p>Identifying Requirements</p> <p>The following steps shall be used to identify goods and services requirements:</p> <ul style="list-style-type: none"> Identify required outcome(s); 	In compliance	Documentation has been sighted by the auditor showing that Finance has followed and documented the appropriate steps to identify goods and services requirements.

Section	Requirement	Status	Evidence / Comment								
	<ul style="list-style-type: none"> Investigate potential options to achieve the required outcome(s); Establish goods or services required to achieve this outcome; and Determine if these goods and services are necessary. 										
7.2	<p>Minimum Competitive Requirements</p> <p>The following table sets out the minimum competitive requirements that must be adhered to at different monetary values.</p> <table border="1" data-bbox="338 608 1182 823"> <thead> <tr> <th data-bbox="338 608 645 660">Monetary Value</th> <th data-bbox="645 608 1182 660">Minimum Competitive Requirements</th> </tr> </thead> <tbody> <tr> <td data-bbox="338 660 645 713">Up to \$50,000</td> <td data-bbox="645 660 1182 713">Verbal quotation</td> </tr> <tr> <td data-bbox="338 713 645 766">\$50,001 – \$250,000*</td> <td data-bbox="645 713 1182 766">Request sufficient written quotations</td> </tr> <tr> <td data-bbox="338 766 645 823">Above \$250,000</td> <td data-bbox="645 766 1182 823">Open tender through a public advertisement</td> </tr> </tbody> </table> <p>The monetary value is based on Total Estimated Value of the procurement, which includes any extension options and GST.</p> <p>When seeking written quotes, a sufficient number of suppliers should be asked to provide a quote. Generally, three to five suppliers should be asked to quote, however this number may be higher in markets with more competition.</p> <p>The minimum competitive requirements do not apply when purchasing from a:</p> <ul style="list-style-type: none"> Common Use Arrangement or State agency led Standing Offer, in accordance with the Buying Rules; or Registered Aboriginal Business or Australian Disability Enterprise. 	Monetary Value	Minimum Competitive Requirements	Up to \$50,000	Verbal quotation	\$50,001 – \$250,000*	Request sufficient written quotations	Above \$250,000	Open tender through a public advertisement	In compliance	Documentation has been sighted by the auditor showing that Finance has met the minimum competitive requirements and kept the appropriate documentation.
Monetary Value	Minimum Competitive Requirements										
Up to \$50,000	Verbal quotation										
\$50,001 – \$250,000*	Request sufficient written quotations										
Above \$250,000	Open tender through a public advertisement										

Section	Requirement	Status	Evidence / Comment
7.3	<p>Approval</p> <p>Purchases are to be approved by an Authorised Officer from Finance in accordance with its Delegation and Authorisation Register. The request for approval must include the following information at a minimum:</p> <ul style="list-style-type: none"> • Description of the purchase/specification; • Name of suppliers and their quoted prices; • Any relevant information including warranty details, service and support etc.; and • Recommendation and value for money justification. 	In compliance	Documentation has been sighted by the auditor showing that all purchases are appropriately approved, and Finance has kept the appropriate documentation.
7.4	<p>Request Documentation</p> <p>Purchases valued at \$50,000 or greater will require documentation to clearly detail the items below. The format in the Request for Quote or Request for Tender templates should be followed.</p> <ul style="list-style-type: none"> • Request specification; • Evaluation criteria; • Closing date and time; • Contract term; and • Contract terms and conditions. 	N/A	No purchases at or above \$50,000.00 occurred during reporting period.
7.5	<p>Evaluation of Responses</p> <p>For purchases above \$50,000, an evaluation panel, consisting of two or more members including the IWDF Project Manager, shall be formed. A procurement process facilitator will be nominated from the panel members to lead the evaluation process.</p>	N/A	No purchases above \$50,000.00 occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>Each member of the panel will be required to independently review the responses and score against the specified evaluation criteria. The panel shall then convene and make a joint decision regarding the preferred respondent based on these scores.</p> <p>An evaluation report is to be prepared, outlining the findings and recommendation of the evaluation panel. The report is to be submitted to the Authorised Officer who will provide their approval. A copy of the evaluation report shall be retained as a record.</p> <p>Non-conforming responses, including those received after the closing time, or those which do not meet the specified mandatory prequalification requirements will be excluded from consideration.</p>		
7.6	<p>Contract Award</p> <p>Following approval of the recommendation in the evaluation report (for purchases \$50,000 or more) by the Finance Authorised Officer in accordance with the Delegation and Authorisation Schedule, a letter of award will be sent to the successful respondent.</p>	N/A	No purchases above \$50,000.00 occurred during reporting period.
7.7	<p>Managing Contracts</p> <p>Once a contract is in place, various measures shall be implemented to ensure that the contracted goods or services are being provided in accordance with the conditions of the contract. This will include:</p> <ul style="list-style-type: none"> • managing supplier relationships and resolving or escalating disputes as appropriate; • monitoring and managing the budget and timeframes; • confirming the quality and receipt of goods or services; 	In compliance	<p>The FMC performance against contract management plan is provided at the MRMs. See Appendix R section 15.2 in MRMs 17 and 18.</p> <p>There were other short-term contracts in place such as DWE Electrical, Yonga Djena, KPGM and Alf Patroni Fencing however the IWDF Project Director confirmed that, all goods and services were delivered in accordance</p>

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • validating and processing supplier invoices; • reviewing variations for value for money; and • keeping records of key documentation and correspondence. <p>Approvals will be sought from the Authorised Officer from Finance as required by the Delegation and Authorisation Register.</p> <p>Where a procurement has a Total Estimated Value of \$5 million and above, a Contract Management Plan must be developed, unless otherwise exempted through the relevant process.</p>		with the specifications, timeframe and price stipulated in the contract.
Procedure: MP-11 Management Audits			
4.1	<p>Audit Frequency</p> <p>Annual audits have been undertaken.</p>	In compliance	This audit table is evidence of internal audit for the reporting period.
4.1	An Internal Management Audit Schedule has been prepared in July of each year.	In compliance	Audit schedule was prepared by FMC System Manager in Jun 2022. See Appendix V.
4.3	Audit Planning		
4.3.1	<p>Defining the Scope</p> <p>All audits on the Finance management system shall be undertaken in accordance with the following sequence:</p> <ul style="list-style-type: none"> • planning; • execution; and • reporting and follow up. 	In compliance	The required sequence is followed and reporting, and follow-up is reported at the MRMs. See Appendix R Section 7 of MRM minutes 17 and 18.

Section	Requirement	Status	Evidence / Comment
4.3.2	<p>Audit Team Members</p> <p>Audits have been conducted by an audit team which contains a qualified auditor.</p>	In compliance	Audit team included a qualified auditor.
4.3.3	<p>Preparing an Audit Protocol</p> <p>An audit protocol has been prepared prior to the audit.</p> <p>Similar types of protocols shall be used for each audit to ensure consistency of approach.</p>	In compliance	<p>Audit protocol was prepared in the form of this audit table.</p> <p>The audit table format, updated as required, is used each year.</p>
4.3.3	Staff have been notified at least 2 weeks prior to the audit.	In compliance	Relevant staff were notified up to one month prior to audits taking place. All IWDF personnel have access to the audit schedule. Notification also occurred at the monthly management meetings.
4.3.3	An audit report log 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	<p>Non-compliance has been recorded for MP-08 and Management Plan 10. MS 562, MP-08 and Management Plan 10 all require the proponent to hold CLC meetings at least four times a year. For the reporting period only three meetings were held. As this non-compliance occurred during the previous reporting period CAR 007 has already been raised.</p> <p>CAR 008 was raised as a non-compliance was recorded for MP-09. All training was not recorded on a Training Record sheet and kept on file.</p>

Section	Requirement	Status	Evidence / Comment
4.4	Audit Reporting and Follow-up		
4.4.1	<p>Management System Audits Audit findings have been documented in an audit report and logged on the audit report register. The audit report shall contain the following:</p> <ul style="list-style-type: none"> • management system conformities and nonconformities; • records of CARs resulting from the audit; • follow-up of previous audit findings; • conclusion and recommendations; and • effectiveness of the management system in achieving objectives and targets. 	In compliance	<p>Audit findings have been documented in an audit report (this PCR report) and logged in the audit register sighted by the auditor.</p> <p>The effectiveness of the Management System is addressed at section 6.6 of the MRM 17 and 18. See Appendix R.</p>
4.4.1	The audit report has been forwarded to the Finance Project Manager and distributed to personnel.	In compliance	Audit reports are included in the draft PCR provided to Finance IWDF Project Director for review.
4.4.2	<p>FMC Audits A qualified auditor shall audit the FMC Procedures in accordance with FMP-04, Auditing and Compliance.</p> <p>Following the preparation of an audit report the Finance Project Director shall meet with the FMC and their auditor to discuss the findings of the audit report.</p> <p>Finance will also undertake a regular review of the FMC performance. Finance will monitor FMC performance on an ongoing basis and report the outcome at the monthly management meetings.</p>	In compliance	<p>A qualified auditor has undertaken an audit of the FMC procedures. See Table 7 of this PCR report.</p> <p>Finance undertakes a review of the FMC Performance which is reported at the MRM. See Section 15 of MRM minutes at Appendix R.</p>

Section	Requirement	Status	Evidence / Comment
4.5	Performance and Compliance Auditing and Reporting 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 the reporting period. This PCR will be forwarded to RCWA and DWER to fulfil compliance reporting.
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 Management Review Meetings (MRM) have been held twice yearly.	In compliance	MRMs were held 15 December 2022 and 13 June 2023. See Appendix R for MRM meeting minutes.
4.1	Personnel required to attend the meeting are: <ul style="list-style-type: none"> IWDF Project Director – Finance IWDF Project Director – FMC IWDF Contract Manager - Finance IWDF Project Manager – FMC IWDF Radiation Safety Officer 	In compliance	The MRM 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	Review Preparation 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 on 7 Dec 2022 and 8 June 2023. See Appendix W for meeting agendas.
4.3	Issues to be Considered Management review meetings have addressed the suitability of Finances policies, achievement of objectives and targets, EHSM program and corrective and preventative actions.	In compliance	MRMs addressed the required elements. See Appendix R.

Section	Requirement	Status	Evidence / Comment
4.3	<p>Management Review Meeting agendas address the topics:</p> <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; ▪ 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. 	In compliance	See Appendix W for MRM meeting agendas.
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.

Section	Requirement	Status	Evidence / Comment
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 the MRMs. See Appendix R.
4.3	Minutes of Management Review Meetings have been recorded and distributed.	In compliance	Draft MRM minutes were sent via email to the management team for review/input, final minutes then distributed to the management team. See Appendix R.
Procedure: MP-13 Control of Non conformances and Corrective and Preventative Action			
4.2	<p>Reporting non-conformances</p> <p>Following the identification of a non-conformance a CAR has been completed and forwarded to the IWDF Project Manager.</p>	In compliance	<p>Non-compliance has been recorded for MP-08 and Management Plan 10. MS 562, MP-08 and Management Plan 10 all require the proponent to hold CLC meetings at least four times a year. For the reporting period only three meetings were held. As this non-compliance occurred during the previous reporting period CAR 007 has already been raised.</p> <p>CAR 008 was raised as a non-compliance was recorded for MP-09. All training was not recorded on a Training Record sheet and kept on file.</p>
4.3	<p>Reporting Non-conformances</p> <p>Corrective actions and a program for their implementation have been developed for each CAR and reviewed regularly until the action is implemented.</p>	In compliance	<p>For CAR 007 a corrective action, using s45C of the <i>Environmental Protection Act 1986</i>, modifying MS 562 to reduce the CLC meeting frequency has been submitted to the regulator. MP08 and MP10 will be modified if this request is approved.</p> <p>For CAR 008 a corrective action plan has been devised.</p>
4.3	Information regarding each CAR has been entered onto the CAR register.	In compliance	Review of CAR register demonstrated that information about each CAR has been entered into the register.

Section	Requirement	Status	Evidence / Comment
4.3	The progress of each CAR has been presented at a Management Review Meeting.	In compliance	CAR 007 has been discussed at MRMs in the context of resolution options. CAR 008 was not raised until after the June 2023 MRM therefore cannot be presented until the December 2023 MRM.
4.4	<p>Identification of Potential Non-conformances</p> <p>The discovery of inefficiencies and potential non-conformance by staff have been recorded on suggestion sheets and forwarded to the IWDF Project Manager.</p>	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	No suggestion sheets were forwarded to the IWDF Project Manager.
4.4	Where a suggestion has not been accepted a written response has been provided to the author detailing why.	N/A	No suggestion sheets were forwarded to the IWDF Project Manager.
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.
5	<p>Records</p> <p>All CARs and suggestion forms have been retained on the appropriate file.</p>	In compliance	No suggestions forms have been received; review confirmed that all CARs have been retained in the appropriate file.
6	<p>Reporting</p> <p>All CARs and suggestions and their actions, implementations and responses shall be detailed at the Management Review meeting.</p>	In compliance	See Appendix R for MRM Minutes

4.2.2 FMC IWDF Management System Compliance Audit

Table 7 presents the results of the July 2022 to June 2023 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 non-compliances recorded.

Table 7
FMC Environmental Health and Safety and Quality Management System 2022 – 2023 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</p> <p>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 electronic folder demonstrated that where Finance notified the FMC of an initial enquiry a preliminary phone conversation was held with the waste owner to provide an overview of disposal at the IWDF. If required, the waste owner was 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</p> <p>The FMC Project Manager shall ensure that the Guidelines for disposal at the IWDF are provided to waste owners enquiring about disposal.</p> <p>The FMC Project Manager or Systems Manager must provide the most up-to-date version of the Guidelines to waste owners.</p>	In compliance	Review and Interview confirmed that all waste owner enquiries, with appropriate waste, 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>). 	N/A	No applications to dispose of waste were received during the reporting period.
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 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</i></p>	N/A	Review of the FMC Waste Enquiries folder demonstrated that no assessments were undertaken during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p><i>Management.)</i></p> <p>Assessment results shall be provided to Finance upon request and may be incorporated into the <i>Operation Environmental and Waste Acceptance Procedures</i>.</p>		
OP-02 Operational Administration, Planning and Approvals			
Purpose: Addresses the management of environmental and safety impacts associated with the planning phase.			
Not required as no 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.			
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.			

Section	Requirement	Status	Evidence / Comment
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	<p>Project Administration The FMC Project Manager shall manage the finances of the project and invoice Finance 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>	In compliance	IWDF FMC Ongoing Management Task Plan and cost projection, against agreed cost codes, for July 2022 – June 2023 was provided to Finance on the 21 June 2022.
5.2	<p>Tendering 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 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	At the request of Finance, the FMC undertook several minor maintenance items identified from a Building Condition Assessment during their May 2023 site visit.

Section	Requirement	Status	Evidence / Comment
5.4	<p>Update of Legislation Upon request by Finance, the FMC Project Manager shall ensure that necessary legislative updates are incorporated into subsequent IWDF documentation, in accordance with Finance MP-02 <i>Applicable Laws, Regulations and Other Requirements</i>.</p>	In compliance	The Legal Register was reviewed and updated in Nov 2022 and where applicable updates were incorporated into IWDF system documentation. See Appendix Q.
5.5	<p>Review of Good Practice 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 management, alternative treatment technologies and landfill management.</p>	In compliance	Formal review of good practice was undertaken in Dec 2022 and June 2023. A review of the IWDF Document Library provided evidence of relevant new or updated state, national and international documents were included. Review of monthly meeting minutes provided evidence that new documents or information 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 G 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>. Monitoring may comprise:</p> <ul style="list-style-type: none"> groundwater monitoring (Environmental Procedure <i>EP-03 Environmental Monitoring</i> 	In compliance	Ongoing monitoring has been completed and records reviewed. See Appendix F for groundwater monitoring results, Appendix M for rehabilitation

Section	Requirement	Status	Evidence / Comment
	<p>and <i>Instruction EI-01</i>),</p> <ul style="list-style-type: none"> • radiological monitoring (<i>Radiation Procedure RP-01 Radiation Management</i> and <i>Instruction RI-01 Radiation Monitoring</i>), • trench capping monitoring (<i>Environmental Instruction EI-03 Capping Monitoring</i>), rehabilitation monitoring (<i>Environmental Procedure EP-05 Rehabilitation Management</i> and <i>Instruction EI-04</i>). 		<p>monitoring records, and Appendix N for capping monitoring records.</p> <p>See Appendix H for Radiation Monitoring report</p>
5.8	<p>Site Investigations</p> <p>The FMC Project and Operations Manager shall ensure that sufficient data is available to 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). • climate 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>	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 reporting period. All available data is controlled in the IWDF Document Library.

Section	Requirement	Status	Evidence / Comment
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 and other hazardous materials stored at the site (IWDF-Form 51).</p>	In compliance	As no disposal operation occurred during reporting period equipment and facilities maintenance was recorded on the site visit checklist. See Appendix G for Site Visit Checklists and see Appendix X for <i>Dangerous Goods Storage Inventory</i> for Oct 2022 and May 2023 (IWDF-Form 51).
5.10	<p>Access Road Maintenance</p> <p>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</p> <p>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</p>	In compliance	Monitoring records were provided to Finance with the monthly report post the site visit – all records are kept in the IWDF document library. Site visit and monitoring records are also included in the annual PCR. See Section 5 of this PCR.

Section	Requirement	Status	Evidence / Comment
	reporting by Finance. Letters or records shall be submitted to Finance detailing recommendations for additional investigations or site activities, because of reviews or site inspections.		
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.			
OI-01 Waste Inspection			
Purpose – Must be followed during inspections of waste proposed for disposal at the IWDF.			
Not required as no inspections of waste were completed during the reporting period.			

FMC Management Procedures

Section	Requirement	Status	Evidence / Comment
FMP- 01 Document and Data Control			
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.			
5.1	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.	In compliance	Review confirmed controlled documents were stored on the Finance Records Management System, FMC server in the

Section	Requirement	Status	Evidence / Comment
			<p>IWDF Document Library or appropriate IWDF project folder.</p> <p>See Appendix T for Finance and FMC 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 were prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the IWDF Document Control Matrix. See Appendix T.</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> <ul style="list-style-type: none"> • FMC Procedures • FMC QA Forms 	In compliance	<p>Review confirmed all FMC prepared documents have been allocated a unique document number such as DF12020-001-0PCR Revision 1 and where necessary a document number is obtained from Finance. This is demonstrated in Appendix L CLC Minutes.</p> <p>It should be noted that the FMC, uses project document control registers for all projects. These document control registers contain similar elements as IWDF-Form-16 therefore the substitute was considered suitable</p>

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • 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	Review of appropriate folders confirmed that distribution emails were saved in the appropriate folder or documented in relevant meeting minutes.
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, where required, 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	A random sample of documents and associated folders were reviewed which verified that documents have been reviewed by the FMC IWDF Project Manager or Project Director before they are provided to Finance.

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.		Where electronic documents have been reviewed/approved via email the email is saved in the appropriate Management System email folder.
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 random review confirmed that superseded electronic system 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	Random review confirmed master copies of controlled documents are stored in the appropriate electronic folder or for external documents 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 of monthly reports confirmed that all critical documents such as monitoring reports etc. were provided to Finance with the monthly reports and are then recorded on the Finance Records Management

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>System. All monitoring reports for the reporting period are also included in this PCR which will be stored according to the Finance Retention and Disposal 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	Random review confirmed 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>		
FMP-03 Training and Competency			
<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	Review of the FMC 2022 - 2023 Training Register/Schedule confirmed appropriate training was completed for all FMC controlled visitors to the IWDF and FMC personnel with a specific task at the IWDF.

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>Review of the FMC Training Register and Schedule showed there had been one refresher General Safety Induction for the Systems Manager who was potentially undertaking a site visit to the IWDF 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>		<p>There were no new FMC personnel during the reporting period.</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	<p>No disposal operation occurred during reporting period.</p>

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.			
5.2	<p>Audit Frequency/Schedule 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 V for audit schedule.
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	Audit Team	In compliance	Internal audits were undertaken by the Systems Manager who is a qualified auditor.

Section	Requirement	Status	Evidence / Comment
	<p>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>		
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 Management Review (see below). • 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>	In compliance	<p>Audit Register was sighted verifying that it included all annual audits from 2008 to 2023.</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>

Section	Requirement	Status	Evidence / Comment
FMP- 05 Control of Non-Conformances			
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.			
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</i> (IWDF-Form-11) by the receiver.</p> <p>Potential non-conformances and suggestions for improvement may also be reported using a CAR.</p>	N/A	No IWDF FMC system non-compliances 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 IWDF FMC system non-compliances were identified during reporting period.

Section	Requirement	Status	Evidence / Comment
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>	Partial compliance	CARs were reported at the December 2022 MRM (Appendix R) however as the final audit report had not been completed before the 13 June 2023 MRM CARs resulting from the audit will be reported at the next MRM to be held in December 2023.
6.	The Systems Manager shall ensure that all records are filed in accordance with FMC Management Procedure FMP-02 Record Management.	In compliance	Random review of IWDF FMC Project folders confirmed records were filed in the appropriate folder.
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 2022 and May 2023 water monitoring events.

Section	Requirement	Status	Evidence / Comment
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 FMC shall be calibrated by the user of the 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>	In compliance	Equipment Maintenance and Calibration Record (IWDF-40) was sighted for water monitoring equipment used during Oct 2022 and May 2023 water monitoring events.
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</p>	In compliance	<p>Equipment Maintenance and Calibration Record (IWDF-40) was sighted for water monitoring equipment used during Oct 2022 and May 2023 water monitoring events.</p> <p>As the equipment is owned by the FMC and is used by other projects the master maintenance and calibration records are</p>

Section	Requirement	Status	Evidence / Comment
	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.		maintained within the FMC's company management system.

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</p> <p>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 is 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 any priority species is recorded on the monitoring locations figure provided at Figure 4 of this PCR.</p> <p>Florabase was consulted Oct 2022 and the Flora Identification Kit was reviewed prior to the October 2022 monitoring event.</p> <p>No clearing occurred during the audit / reporting period.</p>

Section	Requirement	Status	Evidence / Comment
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> <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 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>	N/A	No clearing occurred during the reporting period.
5.3	<p>Flora Identification Available flora identification kits 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>	In compliance	Florabase was consulted October 2022 and the Flora Identification Kit was reviewed prior to the October monitoring event.

Section	Requirement	Status	Evidence / Comment
	<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> <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>		<p>No clearing occurred during the audit / reporting period.</p>
5.4	<p>Weed Identification</p> <p>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. 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 October 2022.
EP– 02 Fauna Management			
Purpose: Addresses management of native fauna at the IWDF.			
5.2	<p>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.</p>	In compliance	<p>Review of the incident records confirmed that no incident reports related to native fauna were made during the reporting period.</p>

Section	Requirement	Status	Evidence / Comment
5.3	<p>Clearance of Vegetation Unnecessary clearance or disturbance of vegetation (the natural habitats for native fauna) shall always be avoided.</p> <p>Off-road vehicle usage is prohibited, unless authorised by the Operations Manager.</p> <p>Clearance of vegetation shall only be undertaken under the direction of the Operations Manager.</p>	N/A	No clearing occurred during the reporting period.
5.4	<p>Fauna Injuries or Deaths 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>	N/A	No fauna death or injuries were reported during the reporting period.
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 the incident records confirmed that no incident reports related to roadkill were made during the 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>	In compliance	The Operations Manager confirmed that all monitoring bores were capped.

Section	Requirement	Status	Evidence / Comment
	Any drill hole, borehole or monitoring bore shall be filled, plugged, or capped, after completion, to avoid unnecessary trapping of animals in the uncovered hole.		
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 the Operations Manager and other IWDF personnel confirmed that no feral animals were sighted at the camp area while at the IWDF during the reporting period.
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. 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>	In compliance	<p>Monitoring records verify that all monitoring, required during the reporting period, was undertaken according to the schedule.</p> <p>See Appendix M for rehabilitation monitoring records, Appendix F for groundwater monitoring results, Appendix N for capping monitoring records.</p>

Section	Requirement	Status	Evidence / Comment
	<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>		Gamma radiation monitoring was completed October 2022. See Appendix H for report.
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. 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>	N/A	<p>Groundwater monitoring was completed Oct 2022, and May 2023. See Appendix F.</p> <p>Gamma radiation monitoring was completed October 2022. See Appendix H for report.</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
	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.		
5.4	<p>Specific/Validation Sampling</p> <p>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	Review of incident reporting confirmed no spills occurred during the reporting period.
5.6	<p>Review of Monitoring Program</p> <p>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.
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 after the monitoring was completed. Monitoring results are reported in this PCR. See monitoring results in Section 5 of this PCR report.

Section	Requirement	Status	Evidence / Comment
EP-04 Water Management			
Purpose: Addresses surface water management at the IWDF.			
5.1	<p>Project Planning in Relation to Seasonal Conditions 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>	N/A	No disposal occurred during the reporting period however a review of the project schedule and estimated budget confirmed that contingency had been included for possible delays due to unseasonal rainfall during non-disposal site inspection/monitoring events.
5.2	<p>Surface Topography Management and Drainage Design 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>	In compliance	<p>No disposal operation occurred during the reporting period however each completed disposal cell is surrounded by a V-drain as outlined in the construction specification for the cell. Existing V-drains are inspected during each monitoring visit to the IWDF.</p> <p>Note: V drain maintenance is now required to be reported to the DWER.</p>

Section	Requirement	Status	Evidence / Comment
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 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>	N/A	No disposal operation occurred during the reporting period.
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. 	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<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>		
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>	In compliance	Interview with the Operations Manager confirmed that tracks used to access disposal compounds have been kept clear of vegetation by vehicle use. In addition,

Section	Requirement	Status	Evidence / Comment
	<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>		<p>Finance organised slashing of overhanging vegetation along the access track to the Chemical and Radioactive waste disposal cells during the reporting period.</p> <p>No re-grading was required during the audit period. Tracks to unused locations have been allowed to revegetate naturally. No new tracks constructed during this reporting period.</p>
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. 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.

Section	Requirement	Status	Evidence / Comment
5.4	<p>Rehabilitation of Borrow Pits 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). 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.
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 M for records of October 2022 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. 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.			

Section	Requirement	Status	Evidence / Comment
EP-07 Waste Management			
Purpose: Addresses the management of non-intractable waste at the IWDF.			
5.1	<p>Camp Waste</p> <p>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.</p> <p>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 Operations Manager and other monitoring personnel confirmed that all domestic waste was placed in bags and removed from site at the completion of monitoring events and other non-disposal site visits.
5.2	<p>Sewerage</p> <p>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 last checked April 2022 and was found to be satisfactory.
5.4	Recycling	N/A	Interview with the FMC Operations Manager confirmed that cans, cartons, and

Section	Requirement	Status	Evidence / Comment
	Recycling facilities are not available in Coolgardie or 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).		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 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 fuel was delivered during reporting period.
5.2	<p>Storage of Fuels, Oils, and other Hazardous Materials 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	The FMC Operations Manager verified that all fuels were stored in a double skinned storage tank in the appropriately banded fuel storage area. See Appendix X for Dangerous Goods Storage records.

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>No drums of fuel were left on site during periods of ongoing management.</p> <p>The FMC Operations Manager 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>Photographs confirmed that the fuel storage area was free of flammable vegetation and a current 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	Review of incident reporting confirmed no spills were reported during the reporting period. As the IWDF is unmanned during non-disposal periods spill kits are stored in the sea container at the IWDF.

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).</p>		<p>FMC Operations Manager confirmed that a hardcopy SDS file is in the site office. SDS are also available in electronic format in the FMC project folder.</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	<p>No reportable spills occurred during this reporting period.</p>
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>	N/A	<p>As no waste disposal operation occurred during the reporting period no waste oil drums were stored at the IWDF.</p>
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	<p>As no waste disposal operation occurred during the reporting period no waste oil drums were stored at the IWDF.</p>

Section	Requirement	Status	Evidence / Comment
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 of this PCR for appropriately named monitoring locations and Appendix F 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> <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 events have been recorded on a Monitoring Register IWDF-Form-39.</p> <p>See Appendix F for groundwater monitoring records.</p>

Section	Requirement	Status	Evidence / Comment
	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.		
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	Monitoring personnel confirmed that groundwater monitoring equipment was tested by dipping in water and checking for signal prior to each monitoring round.
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: <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). 	In Compliance	Bores were dipped but water was not present. Results were recorded on appropriate form. See Appendix F for groundwater monitoring records.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> 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	No disposal operation occurred during reporting period however Interview confirmed that appropriate PPE is worn during monitoring activities at the IWDF.
5.7	<p>Sample Storage and Transport</p> <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>	N/A	No water was detected therefore no samples to be stored or transported. See Appendix F for groundwater monitoring records.

Section	Requirement	Status	Evidence / Comment
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 F 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 F for groundwater monitoring records
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.			

Section	Requirement	Status	Evidence / Comment
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 N 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> <p>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.
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>	In compliance	See Appendix N for Capping Monitoring records.

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. Successive monitoring events are to be recorded on a Monitoring Register (IWDF-Form-39).</p>		
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 N for Capping Monitoring records.
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 N for Capping Monitoring records.</p>

Section	Requirement	Status	Evidence / Comment
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 M for rehabilitation monitoring records.
5.2	<p>Monitoring Locations 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.

Section	Requirement	Status	Evidence / Comment
5.3	<p>Monitoring Schedule 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 M for rehabilitation 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 extent of revegetation, such as: <ul style="list-style-type: none"> • Density of vegetation (% ground coverage). • Maximum height of vegetation. • Average height of vegetation. • 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>	In compliance	See Appendix M for rehabilitation monitoring records.

Section	Requirement	Status	Evidence / Comment
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 reseeding. 	In compliance	<p>Rehabilitation monitoring results for 2022 have been reviewed and compared with previous results and it was concluded that the rehabilitation is progressing well.</p> <p>The 2020NRT01 disposal cell rehabilitated areas are now starting to spread</p>

FMC Radiation Management Procedures

Section	Requirement	Status	Evidence / Comment
RP-01 Radiation Management			
Purpose: addresses the management of radioactive waste disposal at the IWDF.			
Not required as no radioactive disposal operation occurred during the reporting period.			
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>	In compliance	Gamma radiation monitoring was completed October 2022. See Appendix H for report.

Section	Requirement	Status	Evidence / Comment
	A copy of the current calibration certificate or letter of authorisation is to be included with all reports.		
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>	In compliance	See Appendix H for report.
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> <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.
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>	N/A	No disposal of radioactive waste occurred during audit period.

Section	Requirement	Status	Evidence / Comment
	<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>		
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>	In compliance	Gamma radiation monitoring was completed October 2022. See Appendix H for report.

Section	Requirement	Status	Evidence / Comment
	<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>		
6.	<p>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.</p>	In compliance	Review confirmed that all past radiation monitoring reports are included in the radiation monitoring folder of the IWDF Document Library.
7.	<p>The RSO shall submit reports on the various monitoring programs to the FMC Project Manager and Finance Project Manager.</p> <p>Finance shall forward a copy of each radiation monitoring report to the RCWA.</p>	In compliance	The gamma radiation monitoring undertaken in October 2022 was provided to the RCWA on 9 January 2023. The public dose constraint monitoring undertaken during the reporting period is reported in Section 5.4 of this PCR. This PCR will be provided to RCWA. The 2021 - 2022 PCR which included the public dose constraint monitoring for 2021 - 2022 reporting period was provided to the RCWA on the 27 June 2023.

Section	Requirement	Status	Evidence / Comment
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.			
As no radioactive disposal operation occurred during the reporting period only section 5.4 of RI-02 was audited.			
5.4	<p>Public Radiation Monitoring (dose constraint)</p> <p>Public dose exposures under normal operations (care and maintenance) need to be measured to demonstrate that the public dose constraint is achievable.</p> <p>Each time the FMC visit the IWDF a thermoluminescent dosimeter (TLD) badge will be assigned to a person involved in the site activities. The TLD badge should be worn at the waist height. The TLD badge shall be worn prior to the beginning of the site activities and for the duration of the site activities. A TLD badge will also be assigned as a control at a location that will not be impacted upon by any radioactive material.</p> <p>TLD badges should be provided from an approved radiation monitoring service provider.</p> <p>All TLD badges and the control TLD badge should be returned to the RSO as soon as practicable. The RSO will be responsible for sending the TLD badges to the monitoring service provider.</p> <p>On return of badges from monitoring service provider, record TLD dose of each person on the Personal (Worker) Radiation Monitoring Form – PRM5, and Personal (Public) Radiation Monitoring Form – PRM6, including issue date, worker name, date of birth, work activity, and work duration.</p> <p>Where the indicated dose is close to or exceeding the IWDF dose constraint, as discussed in Section 5.3, the RSO must investigate the cause of the dose constraint breach and, if appropriate, put in place further dose control measures to minimise worker exposures.</p>	In compliance	See discussion and results at Section 5.4 of this PCR. Completed Form – PRM6 was sighted.

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 and Health and 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-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>	N/A	<p>No disposal operation occurred during the reporting period.</p> <p>Aspects and Impacts Register was reviewed November 2022 by FMC Project Manager.</p>
5.2	<p>Operational Health & Safety Documentation 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</p>	N/A	<p>No disposal operation occurred during the reporting period.</p> <p>Aspects and Impacts Register was reviewed November 2022 by FMC Project Manager.</p>

Section	Requirement	Status	Evidence / Comment
	<p>necessary).</p> <p>The scope of the OHS&ERP shall be in accordance with the Health & Safety and Emergency Response (Reporting) Guidelines.</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 commencement of any waste handling activities:</p> <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). 	N/A	No disposal operation occurred during the reporting period.
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.			

Section	Requirement	Status	Evidence / Comment
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.			
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 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</p>	In compliance	<p>The FMC Operations Manager 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.

Section	Requirement	Status	Evidence / Comment
	<p>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 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>		<p>Review of Site Visit Records confirmed that there was always more than one person at the IWDF during monitoring events. See Appendix G for Site Visit Checklists.</p>
5.2	<p>Communication Protocol – Arrival/Departure 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</p>	N/A	<p>No disposal operation occurred during reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>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 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>		
5.4	<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 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</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>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 for Access Road and Exclusion Zone</p> <p>A maximum speed limit of 40 km/h is set for the exclusion zone for all vehicles including heavy machinery.</p> <p>A maximum speed limit of 80 km/h is set for all other areas. Normal caution is appropriate at the site, especially near turn-offs and around buildings (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>	General information	
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</p>	General information	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>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>		
5.7	<p>Excavation Traffic Control 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.
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.			
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</p>	N/A	<p>No near misses, accidents or incidents occurred during the reporting period.</p> <p>It should be noted that personnel were only present at the IWDF for several days during the reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>(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 regarding the incident, without the express permission of the Finance Project Director.</p>		
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 	N/A	No major incidents occurred during the reporting period.

	<p>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);</p> <ol style="list-style-type: none"> 2. The Operations Manager / Safety Manager will assess the hazards to others at the 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; 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. 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. 		
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Section	Requirement	Status	Evidence / Comment
	<p>The Finance IWDF Project Manager shall provide a copy to WorkSafe Western Australia if notifiable injuries had been incurred under the <i>Work Health and Safety Act 2020</i> and associated Regulations.</p>		
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</p>	In compliance	Observation confirmed that the 4WD vehicle used to visit the IWDF was equipped with satellite phone and UHF radio, first aid kit, emergency contact details and procedures and can, if required, carry a stretcher.

Section	Requirement	Status	Evidence / Comment
	<p>injured victims.</p> <p>The First Aid Officer will assess whether a victim may be transported in a vehicle for evacuation.</p>		
5.4	<p>Emergency Contact Details</p> <p>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>	General information	A copy of the Emergency Contact Numbers document is in the IWDF on-site Office.
5.5	<p>Emergency Response Team</p> <p>An IWDF Emergency Response Team (ERT) shall respond to all incidents or emergencies</p>	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>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 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.</p>
5.7	<p>General Emergency Response Procedure</p> <p>A general Emergency Response Procedure shall be communicated to all personnel at the</p>	In compliance	Observation and review confirmed that the general Emergency Response Procedure

Section	Requirement	Status	Evidence / Comment
	<p>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>		<p>was included in the General Safety Induction package and is posted in the site office.</p>
5.8	<p>Specific Emergency Response Procedures</p> <p>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	<p>The General Safety Induction package contained the required specific emergency response procedures and procedures were also posted in the site office.</p>
5.9	<p>Communications & Notification</p> <p>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>		<p>See ERP-01 Incident Prevention, Reporting and Investigation.</p>

Section	Requirement	Status	Evidence / Comment
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 corrective/preventive actions are to be discussed (as identified during the emergency investigation).</p> <p>The Operations Manager shall ensure that a record of the debriefing session is taken and filed.</p>	N/A	No emergency incidents occurred during audit period.
5.11	<p>Resumption of Operations Site operations shall only resume when the Operations Manager is satisfied that:</p> <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.			

Section	Requirement	Status	Evidence / Comment
			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.
	ERI-03 Fire Response		
	Purpose: This instruction must be followed in the event of fire at the IWDF.		
			As there was no fire event at the IWDF 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 documents the level of compliance with the management program requirements of each of the IWDF Management Plans for the reporting period. Management of the IWDF was, with one exception, compliant with the applicable requirements of the management plans during the reporting period.

Management Plan 10

The non-compliance recorded related to Management Plan 10 which requires that:

A community liaison committee, containing members of the community meets at least four times per year to raise community concerns, review important documents and provide input into operational decision-making.

Only three meetings were held during the reporting period. It should be noted that on the 14 October 2021 the CLC agreed to hold three meetings per year however Management Plan 10 cannot be modified to reflect this until Ministerial Statement 562 is modified.

A section 45C under the *Environmental Protection Act 1986* application was submitted to the regulator on 2 May 2023 regarding the CLC meeting frequency. Until Ministerial Statement 562 is modified the requirement to hold at least four meetings per year will remain in Management Plan 10.

Table 8
IWDF Management Plans Compliance Assessment for July 2022 to June 2023

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
1	Air Quality	FMC 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 the 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 the reporting period.
		Appropriate personal protective equipment and safety measures will be utilised when necessary.	N/A	No waste disposal occurred during the reporting period.
		Dust suppression techniques will be employed during earthworks.	N/A	No waste disposal occurred during the reporting period.
		Dust monitoring shall be undertaken.	N/A	No waste disposal occurred during the reporting period.
		Vehicles and machinery will be serviced regularly to ensure optimal efficiency.	N/A	No waste disposal occurred during the reporting period.
		If required, manage hazardous atmospheres in disposal cell.	N/A	No waste disposal occurred during the reporting period.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
2a	Decommissioning and Rehabilitation -A Operation Specific and Ongoing	Vegetation and topsoil cleared during operations is stockpiled nearby.	N/A	No waste disposal occurred during the reporting period.
		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 the reporting period.
		Areas undergoing rehabilitation will be monitored annually and assessed by a botanist every ten years. Assessment by a botanist should be next undertaken in October 2024.	In compliance	See Appendix M for Rehabilitation Inspection Records. Assessment by botanist is next due in October 2024.
		Upon completion of site works temporary infrastructure shall be removed.	N/A	No temporary infrastructure on site during the reporting period.
		Disused tracks and road shall be allowed to revegetate naturally.	In compliance	Site inspection reports and aerial photography show that all disused tracks have revegetated naturally.
2b	Decommissioning & Rehabilitation -B Long Term and Site Closure	<p>A decommissioning statement will be prepared six months prior to decommissioning.</p> <p>Proposed Final Cover for Waste Disposal Cells at the Intractable Waste Disposal Facility, Mt Walton East (Clayvault WA, May 2014, reviewed 2019) RCWA approval 17 February 2022.</p> <p>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.</p>	N/A	Not yet required as the IWDF remains operational.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
3	Emergency Response	Implement effective and appropriate emergency response procedures.	In compliance	See page 39 of this PCR for list of Emergency Response procedures and work instructions.
		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	
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. A botanical assessment will be next undertaken in October 2024.
		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 clearing occurred during the reporting period

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
		Fauna injuries and deaths will be treated as environmental incidents.	Unable to audit	No environmental incidents were reported during reporting period.
		Drivers within the site shall be aware of native fauna.	In compliance	Native fauna awareness was included in the general safety 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	FMC Operation Manager confirmed that as of May 2023 all boreholes and trenches remain capped to prevent fauna ingress.
		Dust suppression techniques shall be used during operations.	N/A	No waste disposal occurred during reporting period.
		Priority flora identification kit to be regularly updated.	In compliance	Priority flora identification kit was reviewed prior to the October 2022 monitoring event however no changes were required.
		Weed identification kit shall be regularly updated.	In compliance	The weed management plan and identification kit were reviewed October 2022 however no changes were required.
5	Health and Safety	Comply with Operation Health and Safety and Emergency Response Procedures.	In compliance	Where applicable – during site inspection visits.
		IWDF health and safety processes and procedures comply with the <i>Work Health and Safety Act 2020</i> (WHS Act) and accompanying regulations.	In compliance	As the <i>Work Health and Safety Act 2020</i> (WHS Act) and accompanying regulations were implemented 31 March 2022 the IWDF processes, procedures and instructions have

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
				been updated, if required, with consideration to this legislation.
		Maintain a Health & Safety Aspects and Impacts Register.	In compliance	The Aspects and Impacts Register, addressing environmental, socio-political, legal and health and safety aspects, was reviewed and updated November 2022.
		Ensure Safety Data Sheets are readily available.	In compliance	SDS 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.	Not auditable	No incidents or near misses were reported for the reporting period however it is not possible to know if there were incidents or near misses that were not reported.
		Ensure appropriate safety equipment is worn and maintained, and all personnel are adequately trained.	Unable to audit	All personnel visiting the IWDF completed the general safety site induction.
		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.
		Replace fire extinguishers every five years	In compliance	Previous MRM reporting records that the fire extinguishers were last replaced in January 2020.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
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	No radioactive waste was assessed during the reporting period.
		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 the 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 the reporting period.
		A permanent marker shall be placed above all trenches containing radioactive waste	In compliance	Inspection has confirmed that a permanent marker has been placed at each disposal cell. See Appendix Y for photographs of each permanent above ground marker.
		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.	In compliance	A radioactive disposal operation did not occur; however, the 5-yearly environmental gamma radiation survey was completed in October 2022. See Section 5.5 of this PCR for a summary and Appendix H for the complete

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
		Predisposal and post disposal environmental radiation monitoring.	N/A	<p><i>Environmental Gamma Radiation Survey Report.</i></p> <p>Not required as a radioactive disposal operation did not occur during reporting period.</p>
		Monitoring program for public dose constraint shall be undertaken.	In compliance	See Section 5.4 of this PCR for the results of the monitoring for the reporting period.
		Gamma radiation surveys are to be conducted every five years, or associated with a burial operation involving radioactive waste, whichever is the shortest interval	N/A	The 5-yearly environmental gamma radiation survey was completed in October 2022. See Section 5.5 of this PCR for a summary and Appendix H for the complete <i>Environmental Gamma Radiation Survey Report</i> .
		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 1993 CoP is still required as it is called up in s31A of the Radiation Safety Regulations 1983 and the IWDF registration.	N/A	Next third-party technical compliance audit is due October 2023.
		Copy of each radiation monitoring report and 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) to RCWA.	In compliance	A copy of the <i>Environmental Gamma Radiation Survey Report</i> was provided to the RCWA on the 9 January 2023.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
		Copy of each radiation monitoring report and 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) to CLC.	In compliance	A copy of the Environmental Gamma Radiation Survey Report was tabled at the CLC Meeting held 16 February.
		Annual Performance and Compliance Report which will include a copy of all radiation monitoring for relevant reporting periods and 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) when completed.	In compliance	See Section 5.5 of this PCR for a summary and Appendix H for the complete Environmental Gamma Radiation Survey Report.
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.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
		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.
		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.	N/A	No disposal operation occurred during the reporting period.
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.	In compliance	To date the trench and drainage systems have been designed to avoid the infiltration of surface water and potential groundwater effects.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
		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 completed in October 2022, and May 2023 – see Appendix F 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 Waste Acceptance Guidelines.	N/A	No waste acceptance applications were received during the reporting period.
		Assess a waste owner's waste details against the waste acceptance criteria.	N/A	No waste acceptance applications were received during the reporting period.
		Provide details of the wastes in the Operation Environmental and Waste Acceptance Environmental Procedures submitted to the EPA.	N/A	No waste acceptance applications were received during the reporting period.
		Undertake inspections of the waste.	N/A	No waste acceptance applications were received during the reporting period.
10	Community Liaison	Maintain a public database which provides details of all waste disposed at the IWDF.	In compliance	The IWDF Waste Inventory Database contains the information required to be made publicly available. The publicly available information is accessible through the Finance office in Perth.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
		Respond efficiently to complaints and undertake appropriate corrective actions.	N/A	No complaints were received during 2022 – 2023 reporting period.
		An archiving schedule and record retention table are maintained to ensure that documents are archived to allow future generations access to the information.	In compliance	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 I.
		A community liaison committee, containing members of the community meets at least four times per year to raise community concerns, review important documents and provide input into operational decision-making.	Non-compliance	The CLC met three times during the reporting period. Meetings were held 29 November 2022, 16 February 2023, and 29 June 2023. See Appendix L for Minutes. It should be noted that the CLC agreed to meet three times per year at the meeting held 14 October 2021. It should be noted that although sighted by the auditor the minutes for the 29 June 2023 CLC meeting have not been included as they are not yet ratified by the CLC.
		Ensure information regarding the IWDF on Government web page for the IWDF – handbook, brochure etc. is always up to date.	In compliance	Review confirmed that the latest version of the IWDF handbook and brochure were available on the Government web page for the IWDF. The handbook was updated June 2023 and the brochure was updated January 2023.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
11	Review of Management	Undertake regular audits of the management system.	In compliance	The management system was audited during reporting period – see tables 6 and 7 of this PCR for audit tables.
		Hold management review meetings twice yearly.	In compliance	Management Review Meetings were held 15 December 2022 and 13 Jun 2023. See Appendix R for minutes.
		Undertake disposal operation audit of operational procedures.	N/A	No disposal operation occurred during the reporting period.
		Produce an annual performance and compliance report and provide to EPA/DWER and RCWA for review.	In compliance	This PCR. The 2021 – 2022 PCR was made available to the RCWA and the EPA/DWER on the 27 June 2023. It should be noted that due to the size of the PCR it could not be emailed and therefore the RCWA and EPA/DWER were notified that it could be downloaded from https://www.wa.gov.au/organisation/departm-ent-of-finance/intractable-waste-disposal-facility-mt-walton-east-iwdf
		Correct any non-conformances as soon as possible and ensure corrective/preventative actions are in place.	In compliance	There are two outstanding CARs for the reporting period. Both have corrective actions determined and the actions will be implemented during the next reporting period.

MP No	Title	Management Program Requirements	Compliance Status	Evidence / Comment / Suitability
		Regularly review the situation regarding current disposal practices and the awareness of international best practices and advances in technology.	In compliance	Review was completed during the reporting period and the results reported at the Management Review Meetings. See Appendix R for MRM minutes.
		Liaise regularly with national and international waste management regulators.	In compliance	Liaison with the International Atomic Energy Agency, United Kingdom facilities, European facilities, and regulators occurred during reporting period. Results are reported at the Management Review Meetings. See Appendix R for MRM minutes.

4.3.4 Ongoing Suitability of Management Plans and System Documents

The IWDF has in place a set of high-level management plans and two comprehensive management systems (Finance and FMC) that were developed to meet the functional requirements of the following 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 plans and management systems were approved by the EPA and where relevant the RCWA prior to implementation.

Continuous improvement in the management of the IWDF is achieved by implementing processes as follows:

- Regular 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 and procedures continue to meet the objectives for the IWDF.

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 2022 - 2023 reporting period are included as Appendix S.

4.4 IWDF Safety Assessments and Safety Case

A draft safety assessment and draft 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 the 15 October 2020.

A high-level response to the feedback was prepared and provided to the RCWA, on 8 December 2020, for comment. On the 20 September 2021, RCWA agreed with the proposed approach, as outlined in the high-level response, to updating the draft operation and post closure safety assessment and the facility safety case.

Three draft documents have been prepared:

- Post-Closure Safety Assessment (PCSA) based on agreed postulated external accident events during the Institutional Control Period (ICP) and agreed future limits on radioactive inventories for disposal (based on database records).
- Operations Safety Assessment (OSA) based on previous draft OSA and incorporating requirements of RPSC-3 Disposal Code and ARPANSA recommendations (this part applies to PCSA too).
- Facility Safety Case (FSC) which will refer to OSA, PCSA, supporting deterministic and probabilistic assessments and historical safety assessments for siting, design, and construction of the IWDF.

The Post Closure Safety Assessment was submitted to RCWA in late January 2023, the Operations Safety Assessment was submitted to RCWA in late February 2023 and the Facility Safety Case was submitted to the RCWA in early March 2023. To date there has been no feedback from RCWA.

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. See Figure 4 for the photo locations.

The October 2022 rehabilitation monitoring showed generally good vegetation growth. Some areas around the 2020NRT01 disposal cell rehabilitation appeared to be restricted by the presence of fine clay, however other areas are growing well to moderately well. See Appendix M for rehabilitation monitoring records.

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 therefore determined that no further monitoring of the vegetation around the pre 2000 disposal cells would occur.

After a review of recent rehabilitation monitoring reports and aerial photography flown in October 2021 it was decided that rehabilitation monitoring of the vegetation around the 2000RT01 disposal cell should now be considered complete. It was therefore agreed that rehabilitation monitoring for 2000RT01 would not be required from October 2023.

5.2 Disposal Dome (Capping) Monitoring

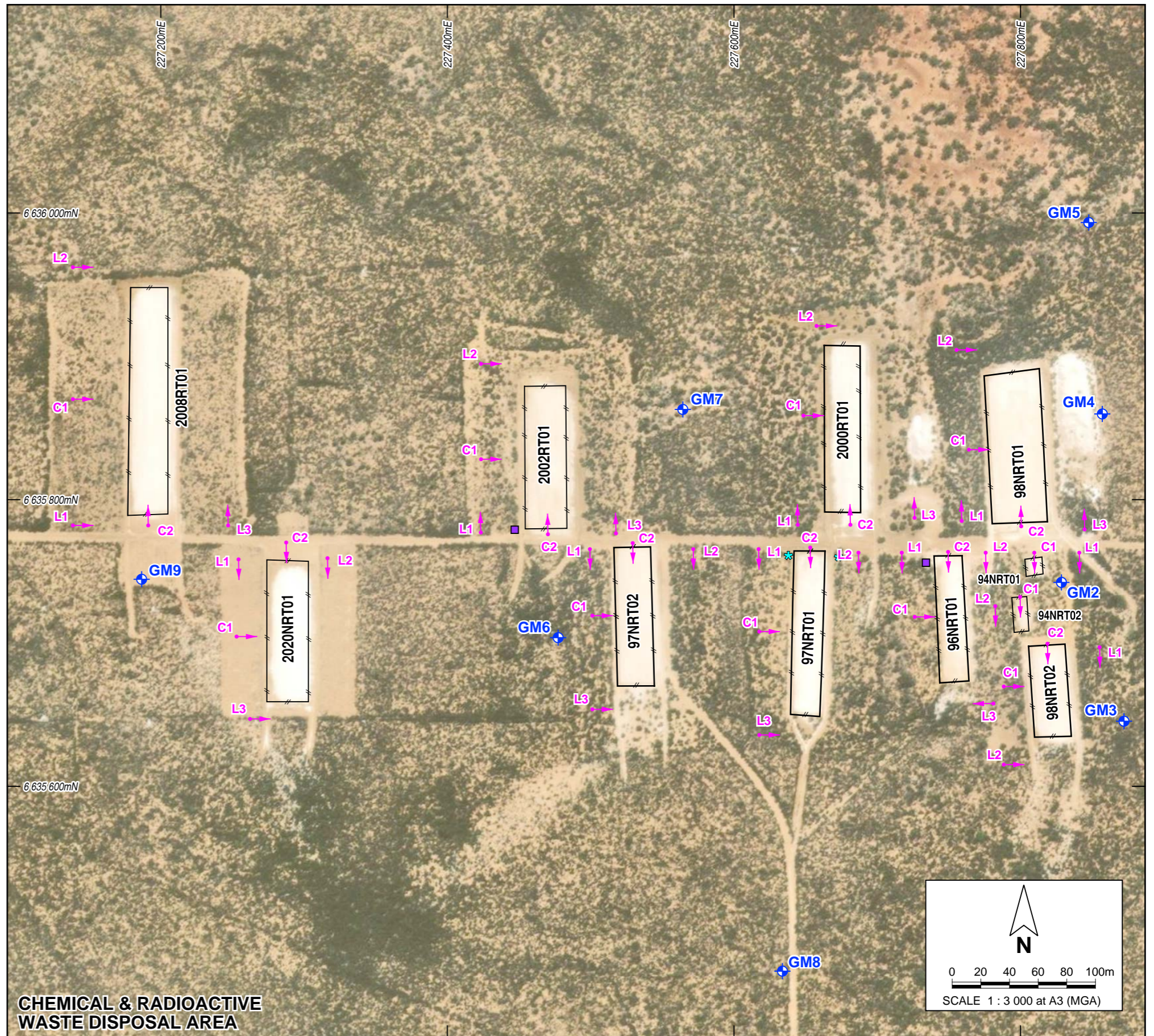
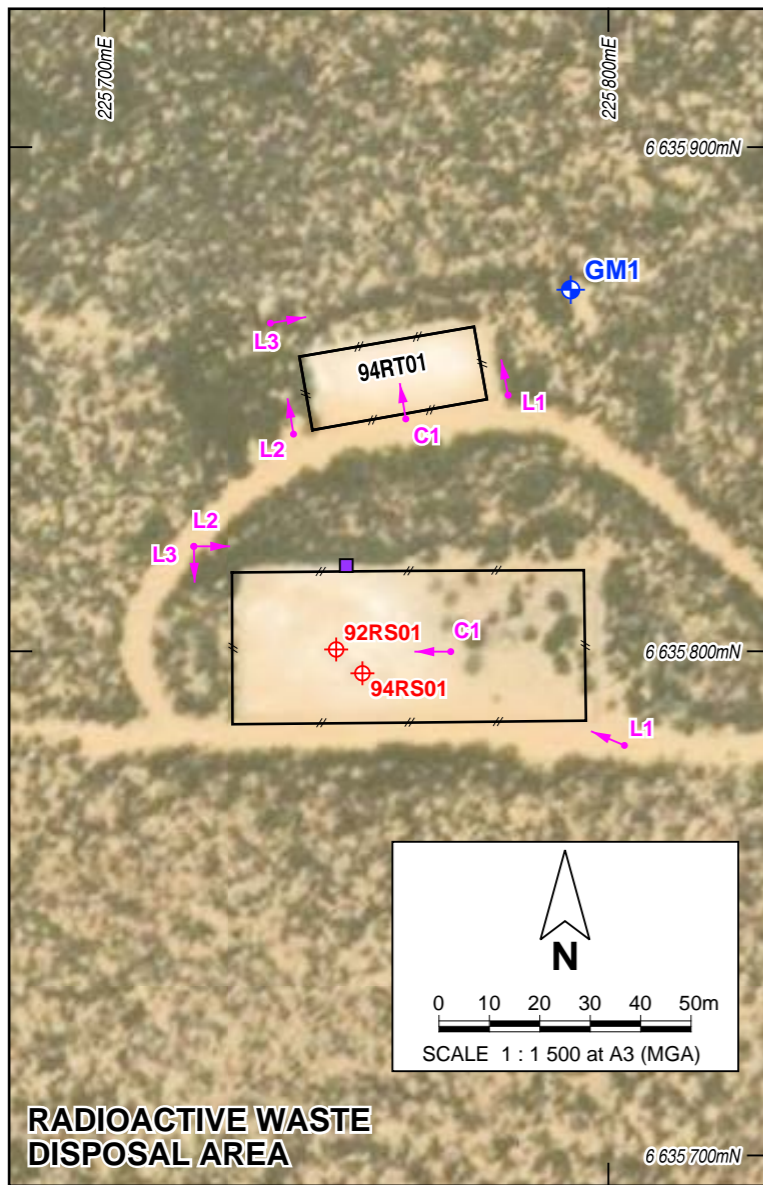
Monitoring of the disposal domes (the water shedding clay caps which overlie each disposal cell) occurs annually and involves the recording of any erosion channels on the domes (number and depth) and any subsidence features (number and depth).

The most recent capping monitoring was completed in October 2022. No significant capping issues were reported. See Appendix N for capping monitoring report.

5.3 Groundwater Monitoring

Groundwater monitoring was completed in October 2022 and May 2023. 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 2022, and May 2023 groundwater monitoring records are provided as Appendix F.



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.

<p>Government of Western Australia Department of Finance</p>	<p>INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST, WESTERN AUSTRALIA</p>	<p>Figure 4</p>
	<p>GROUNDWATER, TRENCH CAPPING & REHABILITATION MONITORING LOCATIONS</p>	
<p>Drawn: L. Morton</p>	<p>Date: 12 Sep 2023</p>	<p>Job: DFI2020-001</p>

PINPOINT CARTOGRAPHICS (08) 9562 7136
 DFI2020-001_PROM-04.dgn

BASE SOURCE: Dames & Moore, 04-07-00.
 AERIAL PHOTOGRAPH SOURCE: ESRI, flown October 2021.

5.4 Public Dose Constraint Monitoring

Measurement of public dose exposures under normal operations (care and maintenance) to demonstrate that the public dose constraint is achievable was implemented at the IWDF in March 2021. Thermo-Luminescent Dosimeter (TLD) badges provided by Landauer Australia are used to monitor whole body dose exposures.

A TLD badge is issued to an FMC staff member to wear and one control TLD is placed at the IWDF site office to monitor whole-body dose exposures when visiting the IWDF.

Whole-body dose exposure monitoring comprises of quarterly periods between the calendar months April and March. The whole-body dose is recorded by TLD badges every three months and cumulative dose calculated over the period of a year to determine the annual dose exposure. Whether site visits are undertaken or not, or whether multiple visits are undertaken within a quarterly period, the cumulative dose is still recorded by the TLD badges for the whole calendar year. Hence, the dose monitoring period was between 30 March 2021 to 31 March 2022 for the 2021 - 2022 annual dose record and the dose monitoring period for the 2022 - 2023 annual dose record will be between 01 April 2022 and 31 March 2023.

Table 9 below shows the dose exposure results between 30 March 2021 and October 2022. It should be noted that the TLD badge dose accumulation has only been recorded for the quarterly periods that encompass the dates of the site visits and therefore the potential public dose exposures.

Table 9
Dose Exposure Results for March 2021 to October 2022

Period of Site Visit	Dose Exposure (mSv)
30/03/21 to 01/04/21	0.01
31/08/21 to 02/09/21	0.01
22/09/21 to 23/09/21	
11/11/21 to 14/11/21	*M
04/04/22 to 06/04/22	*M
17/10/22 to 20/10/22	*M

*M: dose exposure below the minimum measurable quantity for the monitoring period.

Results have returned a dose exposure that was below the Minimum Detection Level (MDL) of 0.01 mSv for each quarter. The total accumulated dose for the 2021 - 2022 calendar year was 0.02 mSv. The total accumulated dose for April to June 2022 calendar months was MDL (0.01 mSv). A public dose constraint has been set for the IWDF of 0.3 mSv/year in line with International Atomic Energy Agency (IAEA) and ARPANSA guidance. Dose exposures were well below the dose constraint.

5.5 Five Yearly Environmental Gamma Radiation Survey

The 5-yearly gamma survey was undertaken during the scheduled site monitoring visit in October 2022. The report was issued to the RCWA on the 9 January 2023.

The absorbed gamma radiation levels in 2022 are consistent with the previous surveys and the levels have remained constant throughout each of the radiation cell compounds. The median results range from 0.11 to 0.16 $\mu\text{Gy/h}$ (0.08 to 0.11 $\mu\text{Sv/h}$) are in good agreement with the typical gamma dose rate levels for the Perth Coastal Plain which has a range of 0.05 to 0.19 $\mu\text{Sv/h}$ depending on local geological characteristics and the average levels for Australia of 0.10 $\mu\text{Sv/h}$.

The radiological conditions for the IWDF have remained stable and are at normal background radiation levels, and therefore present no health risks to the public or the environment. The complete *2022 Environmental Gamma Radiation Survey for the Intractable Waste Disposal Facility (IWDF)* is provided as Appendix H.

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

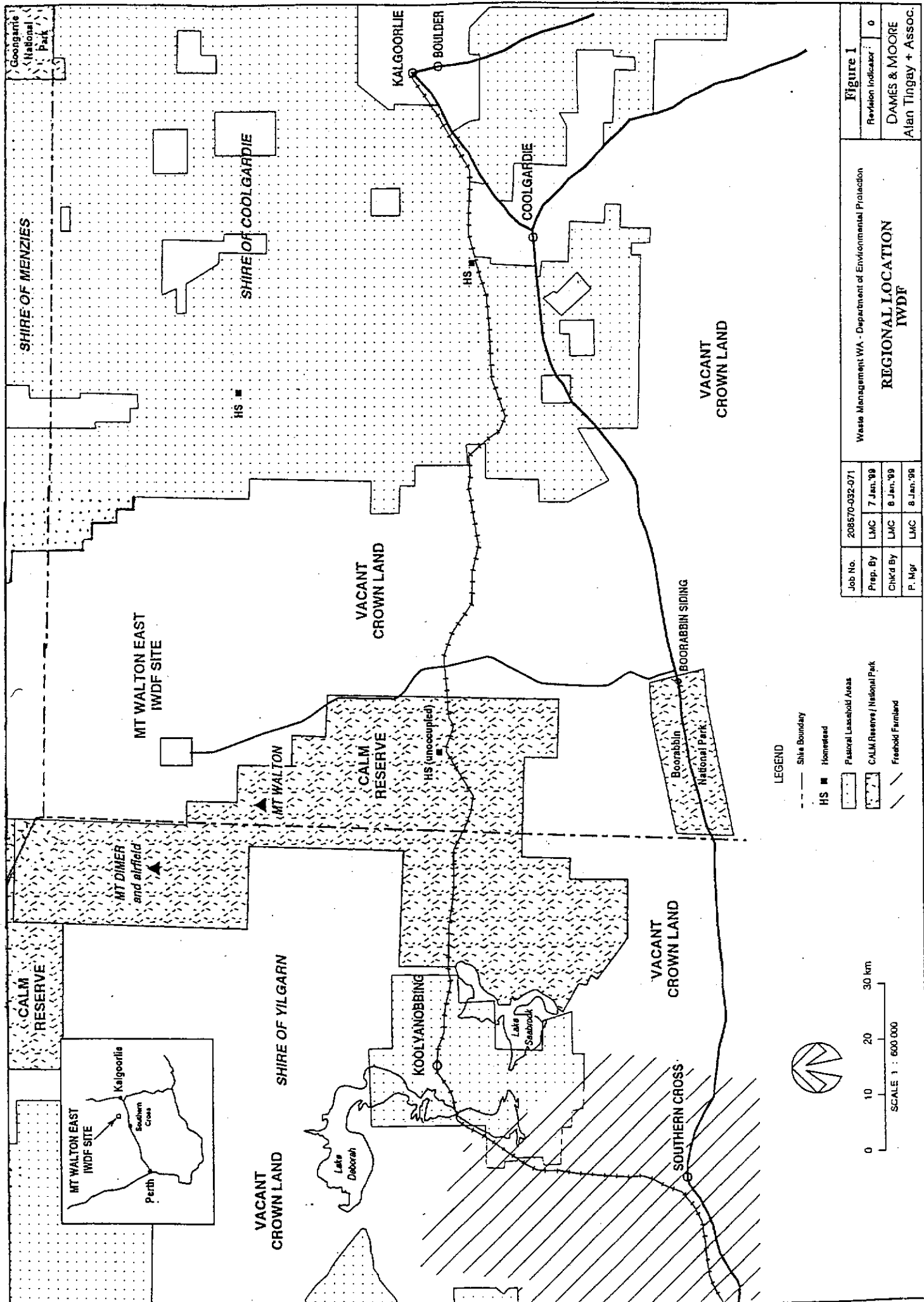
Summary of key proposal characteristics (1286) .

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)



Job No.	208570-032-071		
Prep. By	LMC	7 Jan. '99	
Chkd By	LMC	8 Jan. '99	
P. Mgr	LMC	8 Jan. '99	

Waste Management WA - Department of Environmental Protection	
REGIONAL LOCATION	
IWDF	

Figure 1	
Revision Indicator	0
DAMES & MOORE Alan Tingay + Assoc.	

LEGEND

- Shire Boundary
- HS ■ Homestead
- ▨ Pastoral Leasehold Areas
- ▤ CALM Reserves / National Park
- ▧ Freehold Farmland

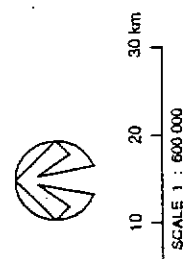


Figure 1. Site location.

**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> <p>(a) an environmental, health and safety policy and corporate commitment to it;</p> <p>(b) mechanisms and processes to ensure:</p> <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 <p>(c) review and improvements of environmental, health and safety outcomes.</p> <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	OBJECTIVES/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
	Transport Management Plan	(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: <ul style="list-style-type: none"> • emergency preparedness; • contractor responsibilities; • procedures; • communications; and • emergency response recovery. 	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 next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Water Management Plan	(3.3) Prepare a Water Management Plan.	To detail procedures and strategies to monitor: <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. 	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
	Emergency Response Plan	(3.4) Prepare an Emergency Response Management Plan.	<p>To ensure that in the case of an incident at the Intractable Waste Disposal Facility:</p> <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.	To obtain stakeholder input to the Operational Guidelines.	Prior to the next disposal operation.	Environmental Protection Authority	Radio-logical Council (WA)	Approved Operational Guidelines
		(4.7) Advertise and make the approved Operational Guidelines required by commitments 4.1 to 4.5 publicly available.	To inform the community.	Prior to the next disposal operation.	Environmental Protection Authority		Performance and Compliance Report
		(4.8) Implement the Operational Guidelines required by commitments 4.1 to 4.5.	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	(5.1) Prepare the Environmental, Radiation, Health and Safety Operational Procedures in accordance with the Operational Guidelines.	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/S	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>	To achieve environmental outcomes required by the Environmental Management Program in the conduct of a particular waste disposal operation (see commitment 2).	Prior to each disposal operation	Environmental Protection Authority		Performance and Compliance Report
		(5.3) Advertise and make the approved Operational Procedures required by commitments 5.1 and 5.2 publicly available.	To inform the community.	Prior to each disposal operation.	Environmental Protection Authority		Performance and Compliance Report

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.	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.	Within three months following completion of each specific waste disposal operation.	Environmental Protection Authority	Radiological Council (WA) in relation to radiation issues	Approved Performance and Compliance Report
		(6.2) Advertise and make the approved Performance and Compliance Report required by commitment 6.1 publicly available.	To inform the public.	Within 4 weeks of obtaining approval for the Performance and Compliance Report.	Environmental Protection Authority		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.	Prior to each disposal operation.	Environmental Protection Authority		Environmental, Radiation, Health and Safety Operational Procedures

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ 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 RS 13/2011 20590

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

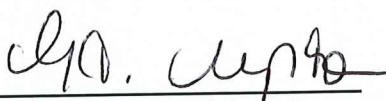
6. **Purpose(s) applied to the registration***
DISPOSAL OF RADIOACTIVE WASTE - INTRACTABLE WASTE DISPOSAL FACILITY (IWDF), MT WALTON EAST

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
L8190/2007/2**



Licence number	L8190/2007/2
Licence holder	Minister for Works C/- Department of Finance
ACN (if applicable)	NA
Registered business address	Djookanup, 16 Parkland Road Osborne Park WA 6017
DWER file number	2012/006884-1
Duration	18/08/2022 to 17/08/2042
Date of issue	16/08/2022
Premises details	Intractable Waste Disposal Facility BOORABBIN WA 6429 Crown Reserve No.42001 Lot 73 on Deposited Plan 217902 As defined by the coordinates in Schedule 1

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i>)	Assessed production / design capacity
Category 66: Class V intractable site	Not applicable

This licence is granted to the licence holder, subject to the attached conditions, on 16/08/2022 by:

STEVE CHECKER
SENIOR MANAGER WASTE INDUSTRIES
REGULATORY SERVICES

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Licence history

Date	Reference number	Summary of changes
L8190/2007/1	18/02/2002	Licence issued
L8190/2007/1	11/02/2016	Amendment to licence expiry date
L8190/2007/1	29/04/2016	Amendment Notice 1: extension of licence expiry date
L8190/2007/1	09/02/2022	Amendment to licence expiry date
L8190/2007/2	16/08/2022	Licence re-issued

Interpretation

In this licence:

- (a) the words ‘including’, ‘includes’ and ‘include’ in conditions mean “including but not limited to”, and similar, as appropriate;
- (b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;
- (c) where tables are used in a condition, each row in a table constitutes a separate condition;
- (d) any reference to an Australian or other standard, guideline, or code of practice in this licence:
 - (i) if dated, refers to that particular version; and
 - (ii) if not dated, refers to the latest version and therefore may be subject to change over time;
- (e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act; and
- (f) unless specified otherwise, all definitions are in accordance with the EP Act.

NOTE: This licence requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this licence.

Licence conditions

Infrastructure and equipment

1. The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

Table 1: Infrastructure and equipment requirements

Site infrastructure and equipment	Operational requirement	Infrastructure location
Groundwater monitoring bores	Maintain in operational condition.	Bores GM1-GM9 as depicted in schedule 1 Bore location Map and any future bores
Surface water management system	Ensure excavated V drains are maintained around cells, to aid surface drainage away from the water shedding clay dome.	N/A
Security fencing	Ensure fencing for the demarcation of cells is maintained free of holes, breaks and other defects.	N/A

Waste acceptance and disposal

2. The Licence Holder must only accept onto the premises waste of a waste type and waste description in accordance with the requirements of Ministerial Statement (MS) 562.
3. The Licence Holder must immediately recover or remove and dispose of spills of intractable waste outside of the disposal cells.
4. The Licence Holder must ensure that Emergency Response Equipment is located on the premises for the duration of a waste disposal operation.

Stormwater management

5. The Licence Holder must ensure that bunding is constructed to ensure that stormwater is diverted from areas of the Premises where waste is handled or stored.

Monitoring

6. The Licence Holder must record the total amount of waste accepted onto the premises or removed from the premises, for each waste type listed in Table 2, with the corresponding parameters listed in Table 2, and for each corresponding time period set out in Table 2.

Table 2: Waste accepted onto or removed from the premises

Waste Type ¹	Parameter ¹	Time Period ¹
Intractable Wastes	(a) time and date of delivery; (b) waste type; (c) total quantity of the waste package (in kilograms, tonnes, litres or cubic metres); (d) the name of the waste generator; (e) the origin and source location of waste; (f) the physical, chemical and/or radiological characteristics of the waste; (g) the name and contact details of the company transporting the waste to the Premises; and (h) the name of the driver and registration number of the delivery vehicle.	Each load arriving at the Premises

Records and reporting

7. The licensee shall notify the CEO in writing at least 1-month prior¹ to the delivery of waste to the Intractable Waste Disposal Facility Mt Walton East. The following information shall be included in the notification (where known):

- (a) waste type(s) and quantities to be disposed;
- (b) disposal dates; and
- (c) status of approval under MS 562 and the Radiological Safety Act 1975.

Note 1: In the case of an emergency disposal event, where notice of disposal is not able to be provided to the CEO within the timeframe outlined in condition 7, the Licence Holder shall provide notification to the CEO as soon as possible (and no later than the end of the next working day) after becoming aware of the emergency disposal event.

8. The Licence Holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:

- (a) any maintenance of infrastructure that is performed in the course of complying with condition 1 of this licence;
- (b) monitoring undertaken in accordance with condition 6 of this licence; and
- (c) complaints received under condition 10 of this licence.

9. The books specified under condition 8 must:

- (a) be legible;
- (b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;
- (c) be retained by the Licence Holder for the duration of the licence; and
- (d) be available to be produced to an Inspector or the CEO as required.

10. The licence holder must record the following information in relation to complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the Department or another party) about any alleged emissions

from the premises:

- (a) the name and contact details of the complainant, (if provided);
- (b) the time and date of the complaint;
- (c) the complete details of the complaint and any other concerns or other issues raised; and
- (d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.

11. The licence holder must:

- (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and
- (b) prepare and submit to the CEO by no later than 90 days after the end of that annual period an Annual Audit Compliance Report in the approved form.

12. The Licence Holder must submit to the CEO by no later than 90 days after the end of each annual period, an Annual Environment Report for that annual period for the conditions listed in Table 3, and which provides the information in accordance with the corresponding requirement set out in Table 3.

Table 3: Annual Environment Report

Condition	Requirement
-	A summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the previous annual period and any action taken.
NA	Any Performance and Compliance Reports relating to the disposal of waste which were prepared during the previous annual period
Table 1	An updated map showing monitoring bore locations and designations where changes to bore infrastructure has occurred during the previous annual period.
6	Monitoring reports
10	A summary of complaints received during the previous annual period

Definitions

In this licence, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
ACN	Australian Company Number
ASNO	Australian Safeguards and Non-Proliferation Office
Annual Audit Compliance Report (AACR)	means a report submitted in a format approved by the CEO (relevant guidelines and templates may be available on the Department's website).
annual period	a 12 month period commencing from 1 July until 30 June of the immediately following year.
books	has the same meaning given to that term under the EP Act.
CEO	means Chief Executive Officer of the Department. "submit to / notify the CEO" (or similar), means either: Director General Department administering the <i>Environmental Protection Act 1986</i> Locked Bag 10 Joondalup DC WA 6919 or: info@dwer.wa.gov.au
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> (WA) and designated as responsible for the administration of the EP Act, which includes Part V Division 3.
discharge	has the same meaning given to that term under the EP Act.
emission	has the same meaning given to that term under the EP Act.
Emergency Response Equipment	Fire extinguishers, non-portable water tanks and other equipment approved by EPA for each disposal.
EP Act	<i>Environmental Protection Act 1986</i> (WA)
EP Regulations	<i>Environmental Protection Regulations 1987</i> (WA)
FMC	The Facility Management Contractor
IWDF	Intractable Waste Disposal Facility
licence	refers to this document, which evidences the grant of a licence by the CEO under section 57 of the EP Act, subject to the specified conditions contained within.

Term	Definition
licence holder	refers to the occupier of the premises, being the person specified on the front of the licence as the person to whom this licence has been granted.
OEWP	Operation Environmental and Waste Acceptance Procedures
Performance and Compliance Report	Report on the results of operation-specific activities carried out at IWDF.
RCWA	Radiological Council of Western Australia. The independent statutory authority appointed under the <i>Radiation Safety Act 1975</i> in Western Australia.
premises	refers to the premises to which this licence applies, as specified at the front of this licence and as shown on the premises map (Figure 1) in Schedule 1 to this licence.
prescribed premises	has the same meaning given to that term under the EP Act.
waste	has the same meaning given to that term under the EP Act.

END OF CONDITIONS

Schedule 1: Maps

Premises map

The boundary of the prescribed premises is shown in the map below (Figure 1).

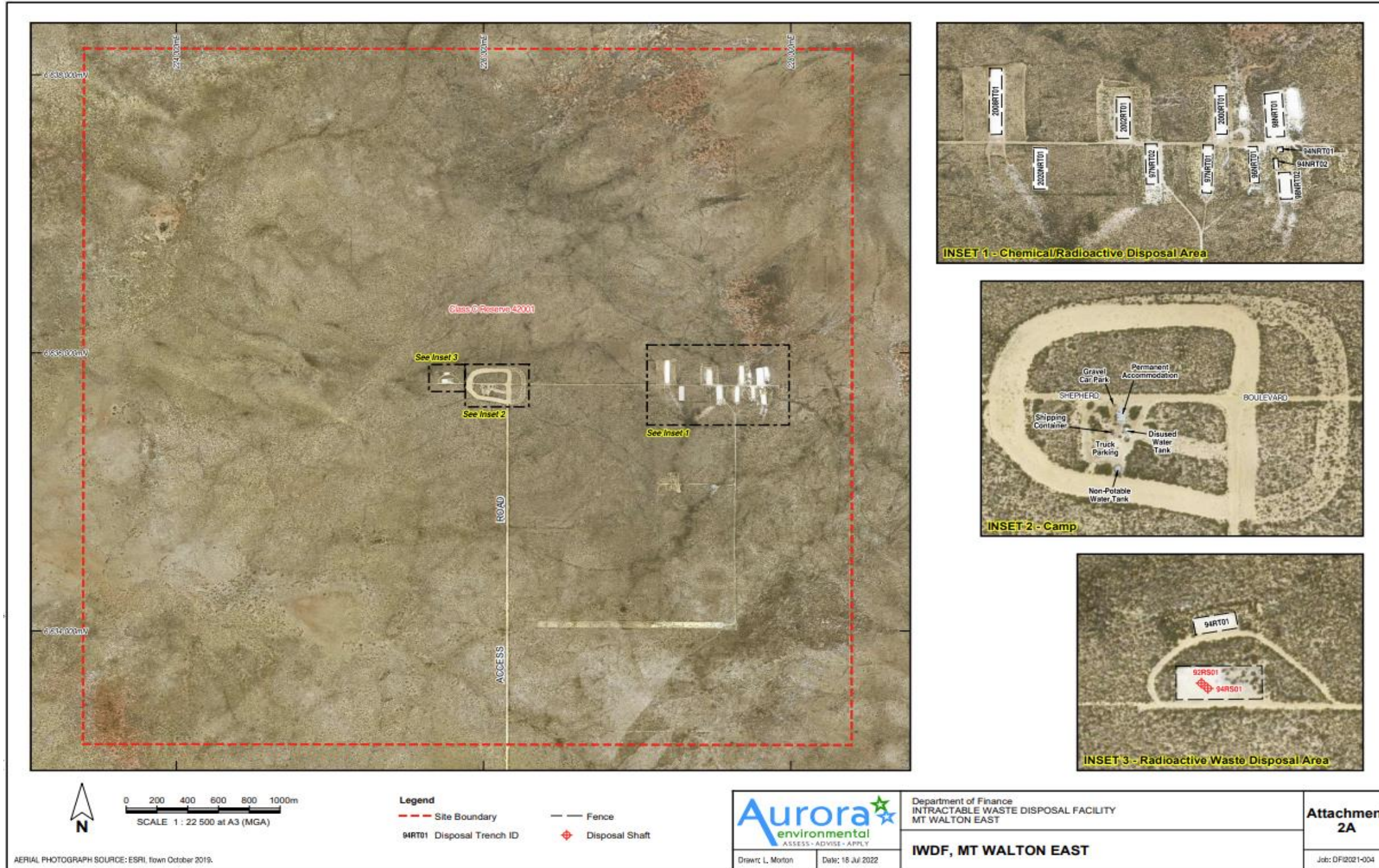


Figure 1: Map of the boundary of the prescribed premises

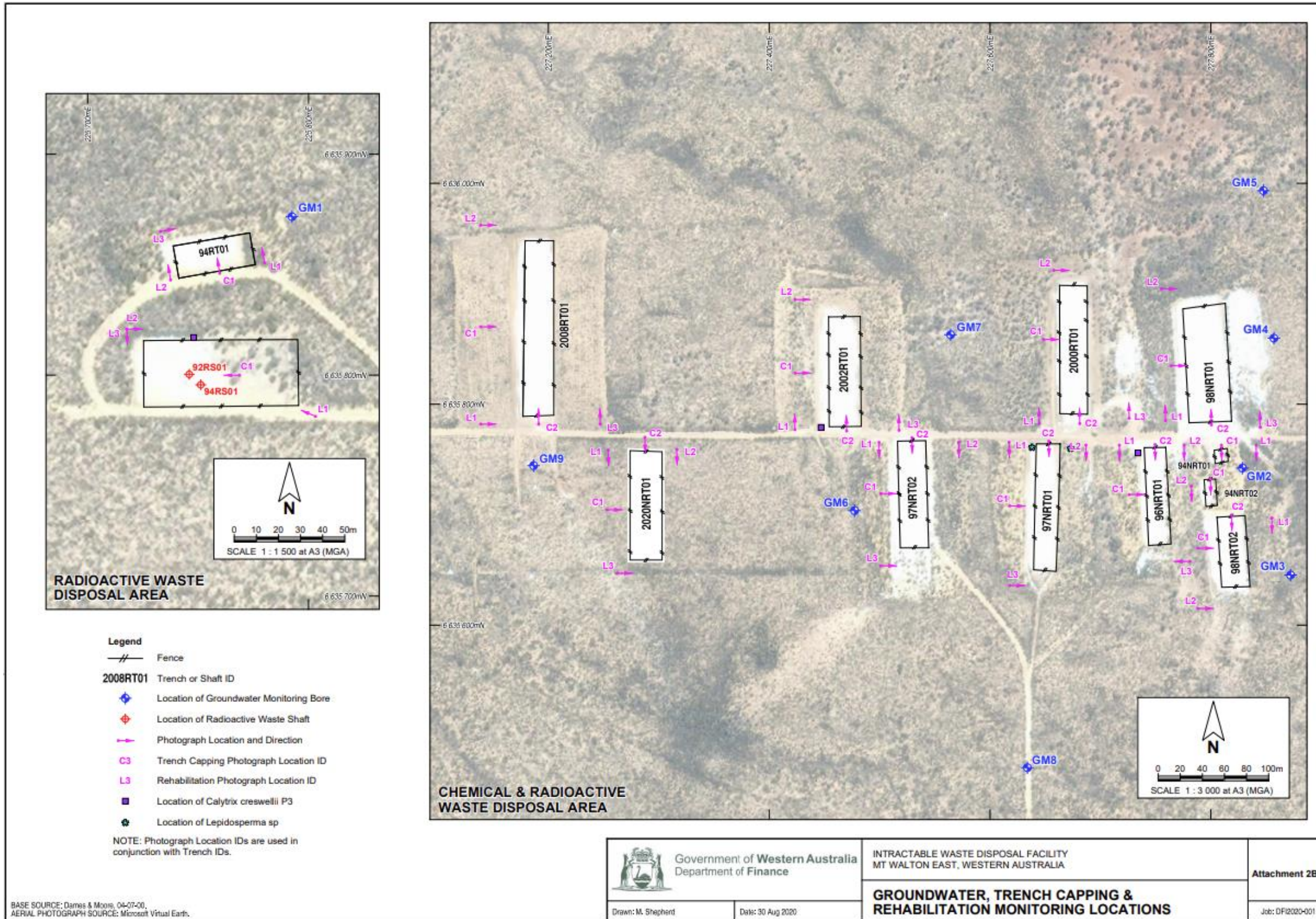


Figure 2: Groundwater monitoring location

Schedule 2: Premises boundary

The premises boundary is defined by the coordinates in Table 2.

Table 2: Premises boundary coordinates (GDA94)

Easting Longitude (x)	Northing Latitude (y)	Zone
120.12237	-30.356576	NW
120.174352	-30.357766	NE
120.172991	-30.402860	SE
120.120979	-30.401658	SW



Application for Licence

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L8190/2007/2
Applicant	Minister for Works C/- Department of Finance
File number	2012/006884
Premises	Intractable Waste Disposal Facility BOORABBIN WA Crown Reserve No.42001 Lot 73 on Deposited Plan 217902 As defined by the coordinates in Schedule 1
Date of report	16 August 2022
Proposed Decision	Licence granted

Steve Checker
SENIOR MANAGER WASTE INDUSTRIES
REGULATORY SERVICES

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, Revised Licence L8190/2007/2 has been granted.

The Revised Licence issued supersedes licence L8190/2007/1 (the Existing Licence) previously granted in relation to the premises. The Revised Licence has been granted in an updated format with existing conditions being updated and new conditions been added to the licence. This Decision Report explains and justifies the proposed changes.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

The IWDF currently operates under Ministerial Statement 562 (MS 562) which was issued in February 2001. MS 562 is the principal document under which the facility and individual disposal campaigns are regulated and requires the submission of detailed plans and reports for each individual waste disposal campaign. Licence L8190/2007/2 seeks to integrate general controls and requirements which support, but do not duplicate, the overarching and campaign-specific requirements of MS 562.

2.2 Application summary and overview of premises

The Intractable Waste Disposal Facility (IWDF), Mt Walton East, established in 1992, is Australia's first long-term disposal site for intractable waste. The IWDF is owned by the State Government and can only be used for intractable waste generated in Western Australia.

The Department of Finance on behalf of The Minister for Works submitted an application to replace expiring licence L8199/2007/1, issued under Division 3 Part V of the *Environmental Protection Act 1986* for a Category 66: Class V intractable landfill site.

The IWDF is about 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 IWDF is by a 100-kilometre unsurfaced road that extends northward from Boorabbin siding on Great Eastern Highway.

Intractable wastes include radioactive wastes which need time to break down or decay to safe levels for the environment, and chemical wastes including industrial by-products like arsenic trioxide, sheep dip and pesticides which contain hazardous chemicals that cannot be easily destroyed.

To be approved for disposal at the IWDF, the waste:

- Must be generated in Western Australia. The Facility Management Contractor (FMC) on behalf of the proponent is responsible for assessing the waste to ensure it has been generated in WA. The assessment for each waste is included in the Operation Environmental and Waste Acceptance Procedures submitted to the Environmental Protection Authority (EPA).
- Must not have an alternative (better for the environment) commercially viable destruction, disposal or management technology. Approval to dispose of any specific waste at the IWDF is conditional on the EPA being satisfied that no commercially

viable destruction, disposal or management technology exists for that waste. The waste owner is responsible for providing evidence in their waste acceptance proforma (application) that they have investigated and ruled out any commercially viable destruction, disposal or management technology for that waste. The FMC on behalf of the proponent, is responsible for assessing the waste to ensure that no commercially viable destruction, disposal or management technology exists for that waste and then advising the proponent if the waste is suitable to be disposed at the IWDF or not. Part of the FMC's ongoing responsibilities is to keep up to date with the ever changing commercially viable destruction, disposal or management technology for intractable waste streams. All waste acceptance proformas (applications) and assessments are appended to the Operation Environmental and Waste Acceptance Procedures submitted to the EPA for approval and are then advertised and made publicly available.

The licence application details that:

Before any (both radioactive and chemical) waste can be disposed at the IWDF the following documents must first be prepared and approved by the EPA.

- Operation Environmental and Waste Acceptance Procedures. These procedures are prepared in accordance with the EPA approved Operation Environmental and Waste Acceptance Guidelines.
- Operation Transport Procedures. These procedures are prepared in accordance with the EPA approved Operation Transport Guidelines.
- Operation Health & Safety and Emergency Response Procedures. These procedures are prepared in accordance with the EPA approved Operation Health & Safety and Emergency Response Guidelines.
- Operation Construction Specifications. These construction specifications are prepared in accordance with the EPA approved Capping Construction Method Statement.

Once the documents are approved by the EPA they must then be advertised and made publicly available.

The documents are also provided to the IWDF Community Liaison Committee for comment and discussion.

Waste disposal

The following information in relation to waste disposal has been summarised from the application.

Conditioning and packaging the waste

Radioactive waste

The conditioning and packaging requirements for disposal of low-level radioactive waste at the IWDF exceed international standards. Conditioning and packaging are supervised by the IWDF Radiation Safety Officer (RSO), the FMC Project Manager, and where appropriate personnel from the Radiation Health Unit of the Health Department. Each item of low-level radioactive waste is carefully identified, measured, and recorded under strict supervision. The conditioning and packaging of the radioactive waste is then undertaken in accordance with the Radiological Council of Western Australia (RCWA) approved methodology.



Figure 1: Packaged radioactive waste prior to disposal

Chemical waste

Chemical wastes are conditioned according to the requirements of the particular waste stream. Packaging includes bulka bags, 205 litre steel drums or sea-containers using suitably qualified personnel with appropriate personal protective equipment (PPE).

Waste loading and transport

All containers holding waste are labelled according to the requirements of the Dangerous Goods Safety (Road and Rail Transport of Non-Explosives) Regulations 2007 and inspected before being accepted for transport.

Low-level radioactive wastes are labelled according to the Code of Practice for Safe Transport of Radioactive Materials (2019). All materials are carried by a contractor licensed to carry radioactive or dangerous goods.

Waste is transported to the IWDF by the shortest practical route with as few stops as possible. Semi-trailers are generally used to transport waste.

Shaft burial

Shaft burial has not been used since 1994. It is very unlikely that a shaft would be excavated or constructed in the same way in the future.

Shaft burial at the IWDF commenced with the excavation of the top few metres of sand and gravel using a backhoe. The hard layer of cemented clay (silcrete) was then blasted and removed. A concrete collar was poured to preserve the top of the shaft. The rest of the shaft was then dug out using pneumatic drills and a vacuum ore-lifter designed to suck clay to the surface.

A concrete base (0.5 m thick) was poured into the shaft. A specially designed steel pallet holding three drums of waste was then lowered into the shaft one at a time. Concrete was poured into the shaft after each pallet was positioned in place. When all the drums were sealed into position, a final half-metre layer of concrete was poured. The rest of the shaft was backfilled with the clay that was dug out of the shaft. This clay was compacted every metre. A prefabricated concrete lid 200 mm thick and weighing 5 tonnes – was then placed over the top

of the shaft and sealed with a sealant. Finally, a dome of water shedding compacted clay was placed over the concrete lid and a wire fence built around the dome.

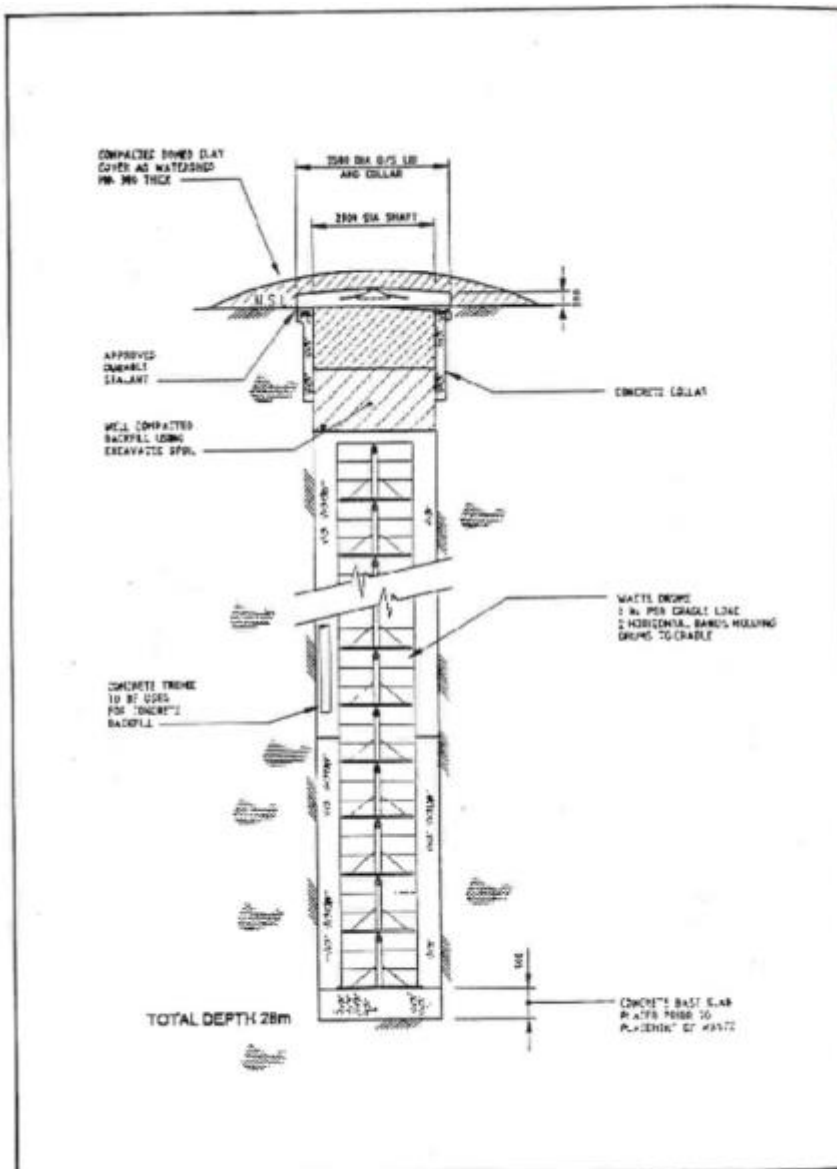


Figure 2 provides a schematic shaft disposal design

Trench burial

Trenches are the main type of disposal cell used at the IWDF.

Segregation of the waste from the environment is accomplished by placing the waste into the natural and extensive kaolinite clay horizon underlying the IWDF. Geological investigations indicate that the clay provides an adequate barrier against potential leaching of the waste when combined with the depth and lateral extent of the clay horizon, which is widespread in the region. A natural silcrete horizon, which overlies the clay, affords natural erosion protection to the clay.

The waste disposal cell is constructed such that the waste is a minimum of five metres above the crystalline bedrock, which underlies the in-situ clay. This is to allow for the possible establishment of a future groundwater table. Regular groundwater monitoring at the IWDF indicates that a groundwater table is currently absent (no groundwater has been encountered down to bedrock).

The waste is further segregated from the surface environment by the construction of a compacted multilayer cap above the waste cell. This multilayer cap comprises compacted clay and compacted silcrete/clay material, which is excavated during construction of the disposal trench. The clay cap, silcrete layer and water-shedding clay dome, which comprise the multilayer cap, are placed and compacted to geotechnical specifications to ensure that they are adequate barriers to infiltration of rainwater and erosion.

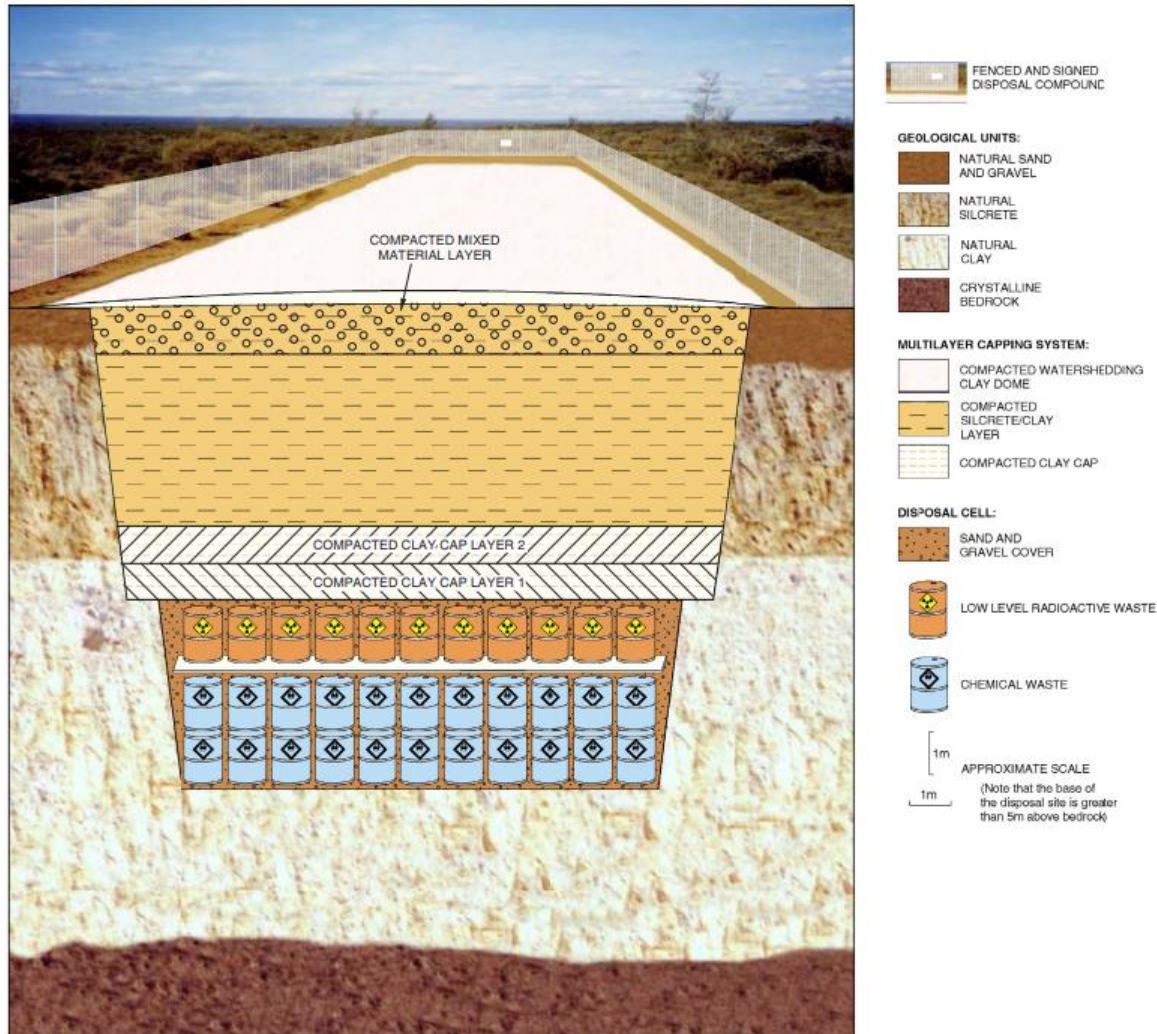


Figure 3 provides a trench disposal design

Summary of disposal cells

The following information has been summarised from the application document.

Since 1992, 14 disposal cells have been established at the IWDF. For each cell, a summary of waste disposed, and dimensions is provided below. Figure 2 shows the location of each shaft and trench.

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.

94RS01 - 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 and Radioactive 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/Radioactive 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.

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 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.

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 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.

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 waste is located 8.5 metres below ground level.

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 and Radioactive 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 waste is located 8.5 metres below ground level.

The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in licence L8190/2007/2.

2.3 Part IV of the EP Act

The IWDF currently operates under Ministerial Statement 562 (MS 562) which was issued in February 2001. MS 562 is the principal document under which the facility and individual disposal campaigns are regulated.

The facility is subject to several conditions under MS 562 including a requirement to implement and maintaining environmental management plans that includes;

- A flora and fauna management plan
- Transport management plan
- Water management plan
- Emergency response plan
- Health and Safety Management plan
- Air Quality management plan
- Radiation management plan and
- Decommissioning and rehabilitation management plan

The environmental impact of the IWDF was assessed by the EPA in the late 1980's under Part IV of the *Environmental Protection Act, 1986*. The Minister for the Environment released a Ministerial Statement, issued under s45 (5) of the EP Act, specifying that the proposal may be implemented under the conditions and commitments as detailed in the statement. Changes to the Ministerial Statement were made early in 2001 to consolidate three earlier Ministerial Statements and to remove the approval for an incinerator.

2.4 Other relevant approvals

The IWDF is registered with the RCWA, and this registration (RS 13/2011 20590) sets conditions, restrictions and limitations for the ongoing management and disposal of radioactive wastes at the IWDF.

As there are small quantities of thorium and uranium disposed at the IWDF the facility is required by the Australian Safeguards and Non-Proliferation Office (ASNO) to have a 'Permit to Possess Nuclear Material'. This permit (PN 207) requires the holder to report annually to ASNO its inventory of nuclear waste.

In compliance with Section 4.5 (o) of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) the last three technical audits have been undertaken at the IWDF by technical personnel of The Australian Radiation Protection and Nuclear Safety Agency ARPANSA

2.5 Recordkeeping

Proponent commitment 7.3 of Ministerial Statement 562 requires the proponent to maintain, update and make publicly available a waste register database for all waste disposed of at the IWDF. This database must detail the disposal method, source, type, quantity, and location of all waste disposed of at the IWDF. The database contains all relevant detail for radioactive and chemical waste disposals at the IWDF. The publicly available information from the database is available on request from the Department of Finance.

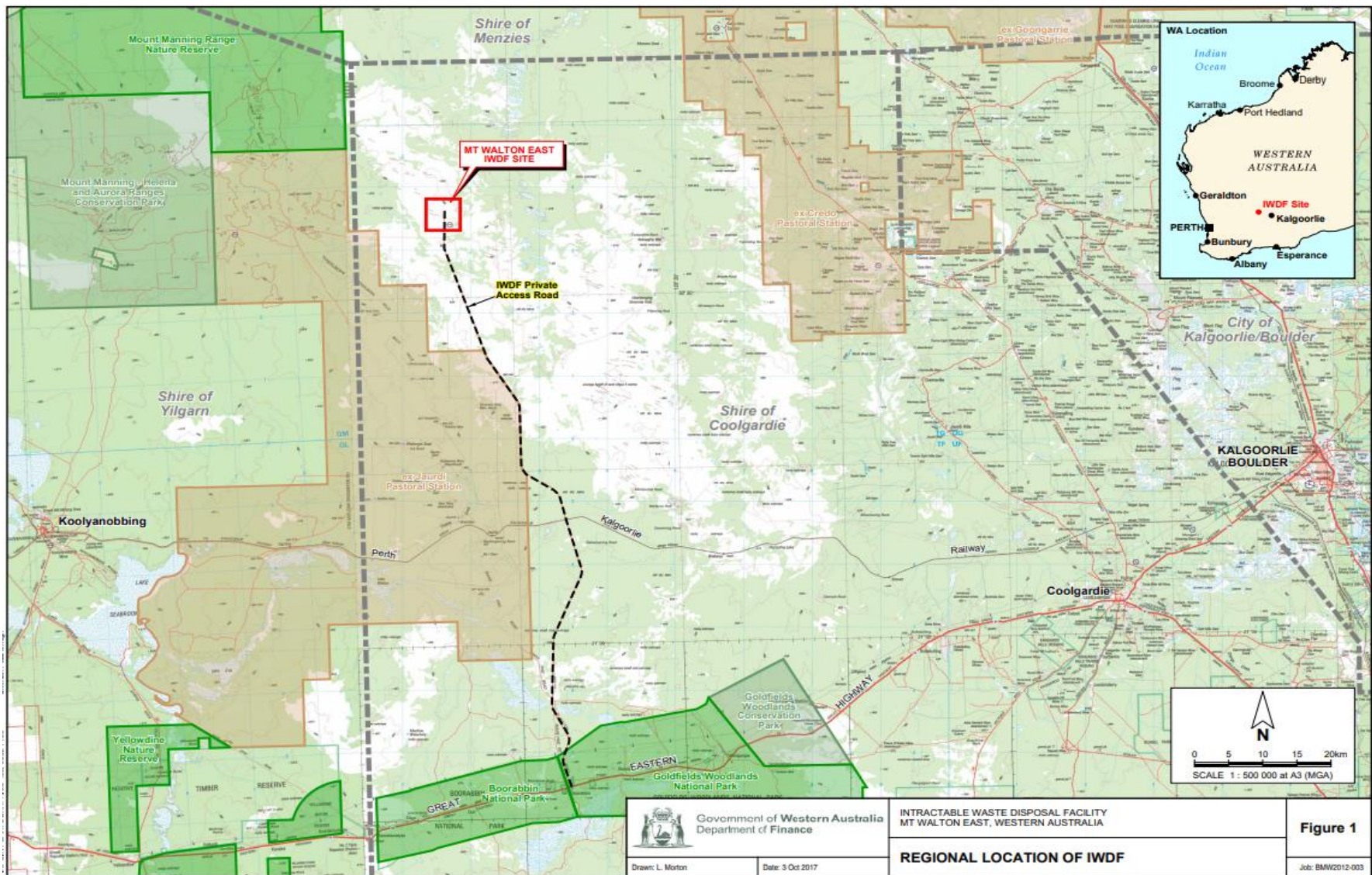


Figure 1: IWDF locality plan

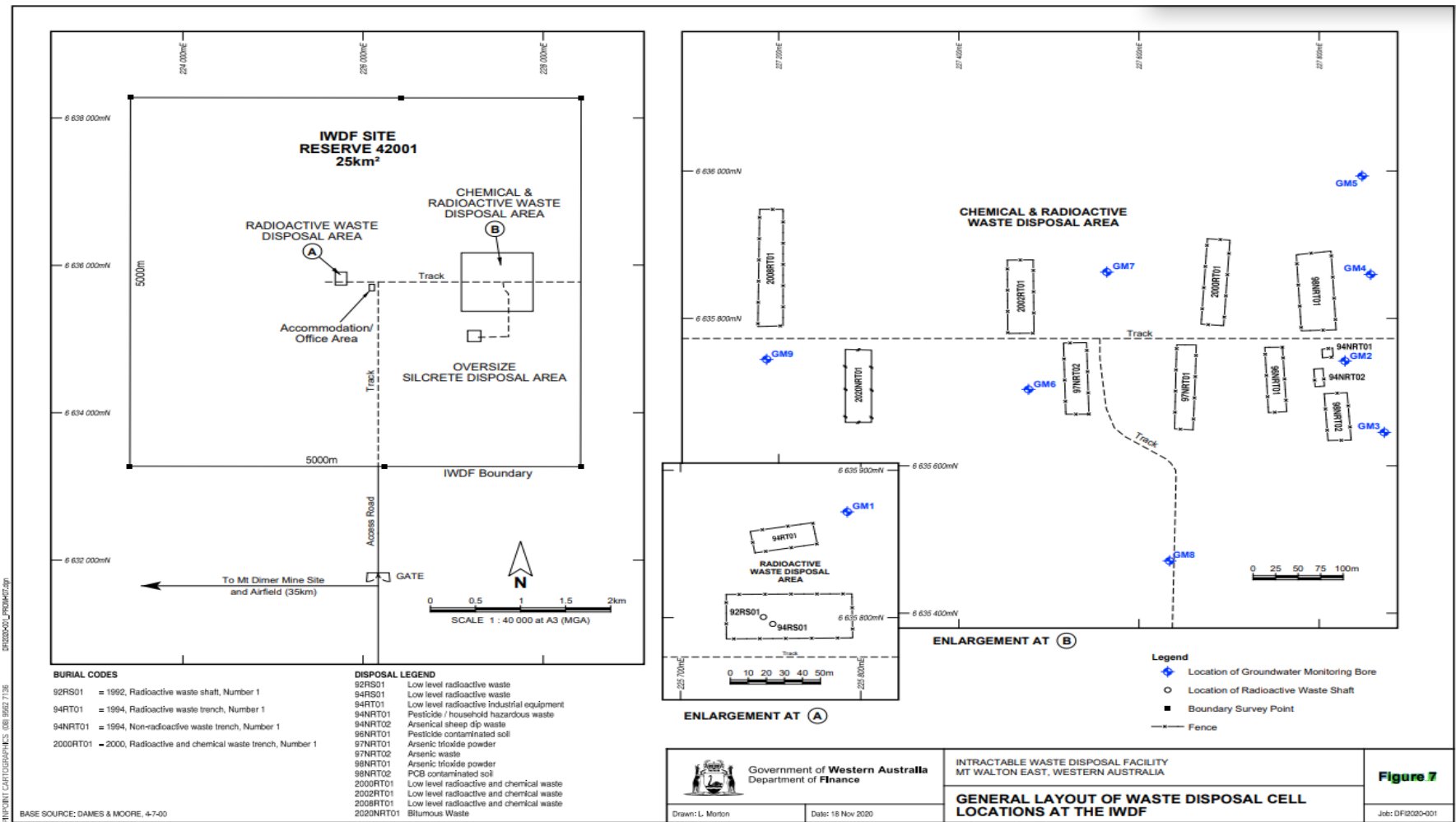


Figure 2: IWDF general layout of waste disposal cell locations

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Procedures and proposed controls
Operation			
Waste, Leachate and Air emissions	Radioactive and Chemical waste delivery	Air / windborne, seepage to soil and groundwater	<p>Planning and approval</p> <p><i>Prior to commencing a disposal operation which includes radioactive waste approval must be obtained from the RCWA for the:</i></p> <ul style="list-style-type: none"> • <i>Design of the burial cell;</i> • <i>Pre-disposal environmental radiation monitoring program;</i> • <i>On-going environmental radiation monitoring program; and</i> • <i>Occupational radiation monitoring program.</i> <p><i>The RSO must ensure that the following approvals are obtained by the waste owner:</i></p> <ul style="list-style-type: none"> • <i>Disposal permit from the RCWA for each item of waste; and</i> • <i>Transport approval for any special form material with expired certification; and</i> • <i>Disposal permit from ASNO, if the waste is subject to a 'Permit to Possess Nuclear Material'.</i> <p>Waste delivery and acceptance</p> <p><i>Mobilisation and set-up of trench office and decontamination facilities;</i></p> <p><i>Induction training and safety management;</i></p>

Emission	Sources	Potential pathways	Procedures and proposed controls
			<p><i>Communications and signage: Signs are placed on the access road to alert any road users of road closure and the presence of truck convoys on the road;</i></p> <p><i>Waste will only be accepted for disposal at the IWDF during daylight hours;</i></p> <p><i>Inspection of initial waste loading at waste owner's site;</i></p> <p><i>The first vehicle of every waste consignment is required to produce a completed Certificate of Identification to prove compliance of the waste with acceptance criteria and a completed Controlled Waste Tracking Form;</i></p> <p><i>Inspection of waste and documentation prior to unloading using an inspection checklist;</i></p> <p><i>The Operations Manager or Safety Manager may reject waste on a package-by-package basis if a package has been materially damaged prior to delivery or does not otherwise comply with waste acceptance criteria or agreed technical specifications (e.g., as outlined in the Certificate of Identification);</i></p> <p><i>Rejected, non-conforming waste packages are covered in a tarpaulin if any waste has been, or shows potential for, spillage;</i></p> <p><i>The non-conforming waste are returned to the waste owner for further cleaning, repackaging, or alternative disposal;</i></p> <p><i>Unloading is undertaken using apparatus appropriate for the waste packages;</i></p> <p>Disposal</p> <p><i>Containers are then placed into disposal cell for burial and capping after the disposal using appropriate apparatus;</i></p> <p><i>Contact between the Operations Manager, forklift driver, rigger, dogman and crane driver are carried out by UHF radio;</i></p> <p><i>The Operations Manager or delegate supervises and records the placement of each package on the appropriate chain of custody document (e.g, by checking off against the Packaging and Loading Checklist) and on a waste placement form;</i></p> <p><i>Further inspection of the waste packages takes place during placement of the waste. Final acceptance of each waste package by the State only occurs once the waste is safely positioned in the trench;</i></p> <p><i>Disposal of contaminated soils and PPE</i></p>

Emission	Sources	Potential pathways	Procedures and proposed controls
			<p><i>placed in the trench as part of the waste;</i></p> <p><i>Intermediate cover placement between layers of waste (usually 2-4 layers of waste depending on the specific trench design) are achieved by placing a pile of sand and gravel at the base of the ramp, in the trench, using dump trucks and carefully pushing the sand over the waste packages using a front-end loader;</i></p> <p><i>In a case where wastes are to be separated (e.g., radioactive wastes from chemical wastes), engineered barriers are constructed as per the specific Construction Specifications;</i></p> <p><i>Capping structure is designed to ensure that the cell structure is stabilized, the intrusion of rainwater is prevented;</i></p> <p><i>Certificate of Acceptance along with appropriate chain of custody documentation (copies of completed loading checklists and chain of custody form), is issued to the driver of each truck that collects an empty trailer/shipping container, for return to the Waste Owner's site. A copy of all returned documentation is kept onsite as well;</i></p> <p><i>Within 14 days after the day on which the waste was unloaded the FMC Project Manager will update the DWER electronic Controlled Waste Tracking System to record that the waste has been received at the IWDF;</i></p> <p><i>V-drains are excavated, to aid surface drainage away from the water shedding clay dome, in accordance with the EPA and Radiological Council approved operation specific construction specifications;</i></p> <p>Monitoring</p> <p><i>Environmental sampling is undertaken following waste placement;</i></p> <p><i>Groundwater monitoring is completed every six months at the IWDF. Groundwater sampling is also undertaken pre and post disposal. There has been no groundwater detected on the site since the first bore was installed;</i></p> <p><i>The lack of groundwater and the thickness of the kaolinitic clay layer are the key geological attributes of the site because they preclude the transport of contaminants off-site;</i></p> <p><i>Biological monitoring is undertaken for chemical disposal operations. It comprises urine sampling of workers before and after the disposal operation for target chemicals</i></p>

Emission	Sources	Potential pathways	Procedures and proposed controls
			<p><i>(generally arsenic) depending on what is being disposed of at the site;</i></p> <p><i>Dust monitoring at six locations around each disposal cell is undertaken before, during and after placement of the waste. Soil samples are also taken before and after each operation from the same locations as the dust samples;</i></p> <p><i>Other on-going monitoring program, conducted since 1992, have involved measurements of:</i></p> <p><i>(i) gamma radiation levels over the disposal structures and on the perimeters of the disposal compounds.</i></p> <p><i>Gamma radiation was undertaken annually between 1992 -1999, then subsequently every 5 years. Last gamma radiation monitoring was completed in Oct 2017, next due in Oct 2022.</i></p> <p><i>(ii) radon concentrations in air in the vicinity of the disposal sites and at a remote site, from 1992 to 1999 and radon and thoron concentrations in the air from 2013 and 2015; and</i></p> <p><i>(iii) radionuclides in soils, 1992 and 2013.</i></p>
Dust	Vehicle movements, lift-off from stockpiles and/or stored product, earthworks etc.	Air / windborne pathway	<p><i>The Operations Manager keeps a record of the prevailing wind direction during all waste disposal activities;</i></p> <p><i>The Operations Manager ensures that dust generation is kept to a minimum in the trench area by regular dust suppression in accordance with inhouse Environmental Procedure (use of water carts, wetting down of roads when required);</i></p> <p><i>The potential for generation of waste dust is minimised by the inspection of waste packages prior to unloading, to ensure that they are:</i></p> <ul style="list-style-type: none"> <i>• clean and free of any surficial waste material;</i> <i>• intact and lacking any perforations or holes, which may lead to spillage of waste material;</i> <i>• Commencement of environmental monitoring (dust and/or radiation)</i> <p><i>• For chemical waste consignments, the Environment Manager ensures that pre-disposal environmental dust monitoring is commenced prior to waste delivery</i></p>

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Ex-Juardi pastoral station homestead	Approximately 50 km southwest of the Premises.
Carina Mine Camp (under care and maintenance at the time of assessment, with two caretakers in residence)	Approximately 52 km southwest of the Premises.
Town of Koolyanobbing	Approximately 70 km south-west of the Premises.
Industrial receptors	Distance from prescribed activity
Sandy Ridge Waste Disposal facility	Approximately 5 km west of the Premises.
Environmental receptors	Distance from prescribed activity
Important wetlands – Western Australia	No important wetlands are located within 20 km of the premises
Geomorphic Wetlands	There are no geomorphic wetlands within 20 km of the premises
Public drinking water source areas	There are no Public Drinking Water Source Areas within 20 km of the premises
Major watercourses/waterbodies	There are no major watercourses/water bodies within 20 km of the premises (based on available GIS dataset – Hydrography WA 250K – Surface Waterbodies).
Surrounding vegetation	Area surrounded by vegetation. <i>Acacia neurophylla</i> , <i>A. beauverdiana</i> and <i>A. resinomarginea</i> thicket mostly dominant in the area.
Groundwater	No ground water has been encountered despite extensive drilling

3.1.3 Geology

The IWDF lies in the central eastern portion of the Achaean Yilgarn Block, a tectonically

stable, ancient craton comprising 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 metres 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 metres thick.

3. kaolinitic clay - comprises soft white kaolin weathered from pre-existing granite. As a result, the clays contain relict quartz phenocrysts. This important layer houses the buried waste and on average is more than 15 metres 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 metres.

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 to 47 metres below the surface. The lack of groundwater and the thickness of the kaolinitic clay layer 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.

3.1.4 Wind direction and strength

The prevailing wind direction has been considered. Using information available on the Bureau of Meteorology's website, the Facility is located between two weather stations, Southern Cross Airfield (No. 012320) and Menzies (012052). Wind data available for the Menzies station provides an historic dataset (1957 to 1996), while the Southern Cross Airport weather station provides data from 1996 to 2019. The Menzies weather station is located approximately 110 km north-east of the proposed premises and the Southern Cross Airport weather station is located approximately 122 km southwest from the premises boundary.

Based on the climate data for the Menzies station (Jan 1957 to Dec 1996), winter morning winds are generally north-easterly and north-westerly, while the prevailing afternoon wind direction in winter is north-westerly. In the summer months, historic wind data at Menzies indicates prevailing south-easterly and north-easterly winds in the morning, and south-easterly in the afternoon. Mean 9am wind speed during the summer months is 19 km/h, while in the winter months 14 km/h.

Based on the climate data for the Southern Cross Airfield station (Oct 1996 to Aug 2019), the prevailing wind direction in winter months is northerly in the morning to west/north-westerlies in the afternoon, and in summer months the prevailing wind direction is generally easterly in the morning and variable in the afternoon. Mean 9am wind speed during the summer months is 22 km/h, while in the winter months 13 km/h.

The relevant pathways that have been considered in the risk assessment table in Section 3.2 are:

- Air and wind dispersion
- Direct discharge to soil
- Surface water overland flow

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Licence L8190/2007/2 that accompanies this decision report authorises emissions associated with the operation of the premises.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 3: Risk assessment of potential emissions and discharges from the premises during Operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Screening, crushing, unloading, loading and storage of material Vehicle movements	Dust	Air / windborne pathway causing Potential suppression of photosynthetic functions	Vegetation surrounding the prescribed premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	<u>Condition 2, 3, 4, 10 and 12</u>	<p><i>Licence conditions included:</i></p> <p>Condition 1 – infrastructure and equipment requirements</p> <p>Conditions 2, 3 and 4 – Waste acceptance and Spill response procedures</p> <p>Condition 10 and 12 – Records and reporting</p> <p>The Delegated Officer also considers that the dust emissions can be sufficiently managed under Ministerial Statement 562 and the amenity impacts can be assessed against the general provisions of the EP Act, specifically whether fugitive dust unreasonably interferes with the health, welfare, convenience, or comfort of any person.</p>
	Disturbance of waste, breach of containment causing discharge to land and air-chemical and radioactive waste	Air / windborne pathway causing impacts to health and amenity. Surface runoff causing soil contamination and inhibiting vegetation growth survival, and health impacts to fauna in the area.	Workers of Sandy Ridge Facility 5 km away Soil and vegetation surrounding the prescribed premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	<u>Condition 1, 2, 3, 4, 5, 11 and 12</u>	<p>Licence conditions included to ensure the appropriate spill response equipment is located onsite and any spilled wastes are contained and cleaned up appropriately.</p> <p><i>Licence conditions included:</i></p> <p>Condition 1: Surface water management system</p> <p>Conditions 2, 3 and 4 – Waste acceptance and spill response procedures</p> <p>Conditions 5 – Stormwater management</p>

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Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								<p>Condition 11 – Compliance reporting</p> <p>Condition 12 – Annual reporting</p> <p>The Delegated Officer also considers that discharges to land can be managed under Ministerial Statement 562 and under the Environmental Protection (Unauthorised Discharges) Regulations 2004 (UDR Regulations).</p>
	Sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Ecosystem surrounding the prescribed premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	<u>Conditions 5, and 11</u>	<p>Licence conditions included to ensure stormwater flows are controlled around the temporary waste storage and waste disposal area to mitigate impacts associated with contaminated stormwater runoff.</p> <p>Conditions 5 – Stormwater management</p> <p>Conditions 11 – compliance reporting</p> <p>The Delegated Officer considers that stormwater contamination can also be adequately managed under Ministerial Statement 562 the Environmental Protection (Unauthorised Discharges) Regulations 2004 (UDR Regulations).</p>
	Radiation	Air/windborne pathway causing impacts to health and amenity of closest human receptors Air/windborne pathway causing	Workers of Sandy Ridge Waste Facility 5 km away	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	<u>Condition 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12</u>	<p>The Delegated Officer notes that the acceptance and storage of radioactive wastes are subject to the approval of the RCWA, in addition to regulation under Part V of the EP Act.</p> <p>Licences conditions are included to ensure the acceptance, handling,</p>

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Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		<p><i>impacts to surrounding ecosystems.</i></p> <p><i>Direct discharge pathway to soil causing impacts to surrounding ecosystems.</i></p>					<p><i>and storage of these wastes in accordance with Radiological Council approval.</i></p> <p><i>Licence conditions included:</i></p> <p><i>Condition 1: Infrastructure and equipment</i></p> <p><i>Conditions 2, 3 and 4 – Waste acceptance and spill response procedures</i></p> <p><i>Conditions 5 – Stormwater management</i></p> <p><i>Condition 6 – Monitoring</i></p> <p><i>Conditions 7 to 12 – Records and reporting including complaints received.</i></p> <p><i>The Delegated Officer considers that the acceptance, storage and disposal of radiological waste is also subject to the approval of the Radiological Council, applicant controls in addition to Ministerial Statement 562 therefore the risks relating to radiation emissions will be adequately managed.</i></p>	

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
<i>Application advertised on the department's website on 7 February 2022</i>	<i>None received</i>	<i>Noted</i>
<i>Local Government Authorities (Shire of Coolgardie and Shire of Yilgarn) advised of proposal on 28 March 2022</i>	<i>None received</i>	<i>Noted</i>
<i>Applicant was provided with draft documents on [date]</i>	<i>Refer to Appendix 1</i>	<i>Refer to Appendix 1</i>

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that the application to renew licence L8190/2007/2 will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

DWER's Guidance Statement; Licence Duration states that the department has a preference to issue longer term (20 year) licences to provide greater certainty to industry and to reduce administrative burden on both industry and the department. This guidance statement explains that in determining a licence duration the CEO will have regard to providing the maximum appropriate licence term taking into account a number of factors, including the duration of statutory approvals and the level of risk of harm to public health and the environment posed by the premises.

The Delegated Officer notes that the IWDF is registered with the RCWA, and the registration (RS13/2011 20590), expires on 8 February 2023. The Licence holder has given assurance that the registration is an ongoing process and that the council will issue another registration before the expiry date. It is the responsibility of the Licence Holder to ensure that all relevant statutory approvals are in place to facilitate an ongoing occupancy and operation of the premises.

In this instance the Delegated Officer has determined to renew the licence for twenty years.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Cover page & throughout document	Typographical changes requested.	Typographical changes adopted.
Infrastructure and Equipment Condition 1	Please note that all disposal operation equipment, plant and machinery are provided by the earthworks contractor or hired, therefore maintenance and servicing is not undertaken by the licence holder. Except for the onsite generator, there is no equipment, plant or machinery kept at the IWDF unless there is a disposal so this condition may not be relevant.	Agreed. Requirement removed.
	Row 2, paragraph 1: The term "cells" refers to both shaft and trench so "trench" can be removed here. Row 2, paragraph 2: The decision report states that the licence seeks to integrate general controls and requirements that support, but do not duplicate, the overarching and campaign-specific requirements of MS 562. The separation distance requirement here is a direct duplication of Proponent Commitment 10 of MS 562.	Agreed. Requirement removed.
	Row 2, paragraphs 3-5: The current cell capping methodology used at the IWDF is best practice for the disposal of low-level radioactive waste but if this best practice changes, the IWDF is required under the <i>Code of practice for near-surface disposal of radioactive waste</i> (RHS-35) to implement best practice and would therefore change the method currently used. If this occurs, would a change to the licence be required?	Agreed. Requirement removed.
	Row 3: The IWDF does not have a separate temporary waste storage area. Temporary storage is located in the laydown area within the exclusion zone for the excavated disposal cell, however,	Agreed. Requirement removed.

Condition	Summary of applicant's comment	Department's response
	<p>waste is often moved directly from the transport vehicle into the cell. Additionally, radioactive waste may only be brought to the IWDF if approved by RCWA so this condition may be a duplication.</p> <p>It should be noted that not all radioactive waste is packaged in drums and in the sizes specified. Due to activity, some isotopes, e.g. radium, may need to be packaged in larger containers. NORMS may be packaged in IBCs or similar.</p> <p>Propose DWER removes reference to specific waste package types and sizes.</p>	
	Row 4: Propose DWER amend to "Bore GM1 – GM9 as depicted in Schedule 1 Bore Location Map and any future bores".	Agreed. Request adopted.
	Row 5: Propose DWER remove "in accordance with the EPA and Radiological Council approved operation specific construction specifications" as the construction specifications do not relate to maintenance.	Agreed. Request adopted.
	Row 6: This is a duplication of Proponent Commitment 9 in MS 562. Additionally, it is proposed that fencing around the perimeter is not required, only around the cells.	Condition updated. The licence holder will now be required to ensure fencing around the cells only are maintained free of holes, breaks and other defects.
Waste Acceptance 1	Should this be condition 2 since condition 1 is under Infrastructure and Equipment? If so, all subsequent conditions to be renumbered. Proposed removing the condition as it duplicates MS 562	Typo corrected. The Delegated Officer agrees that the request would be a duplication, however as the site is unmanned during night-time with no fencing around the property boundary and that the condition relates to waste dumping by third party without prior approval. Therefore the condition will ensure any waste dumped on site without prior approval cannot be buried on site.
Waste Acceptance 1-3	These conditions duplicate/reference existing conditions already governed by the EPA and RCWA. Propose DWER removes.	Previous Conditions 3 and 4 removed.
Waste Acceptance 4	Approach towards this condition is dependent on the outcome of discussions between the licence holder and DWER regarding the	Previous Condition 5 removed

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Condition	Summary of applicant's comment	Department's response
	Temporary Waste Storage Area condition under Infrastructure and Equipment 1.	
Waste Acceptance 5	The IWDF does not accept liquid wastes. Propose DWER removes reference to "liquid wastes". Additional clarification required for reference to engineered containment system, as spills within the cell would not be recovered or removed.	Request adopted. Condition text updated to ensure only spills outside the disposal cells will be recovered or removed and disposed immediately.
Stormwater Management 7	What does DWER consider as "stormwater diversion infrastructure"? Currently, bunds are constructed around disposal cells during an operation. Is this sufficient or does DWER expect diversion infrastructure around the entire exclusion zone? Construction of additional soil bunding would require significant additional vegetation clearing to source the materials required for the bund as the material excavated for the cell is used as backfill. As well as the environmental impact, this will add significant additional time and cost to a disposal operation. Propose DWER amend the condition to state that a temporary bund will be constructed as required to divert stormwater.	The Delegated Officer has reviewed the comments relating to the stormwater diversion infrastructure and considers that only existing bunds are required to be adequately maintained. Condition text updated.
Monitoring 8	Table 2: The weight of waste is not always relevant or recorded. However, volume of waste is always recorded as it is critical for disposal at the IWDF. This is especially so for small quantities of radioactive waste. Propose that DWER do not prescribe the unit of measure (tonnes) for the quantity of waste.	Request adopted. Condition text updated.
Records and reporting 9	Is notification of the intent to undertake a disposal operation sufficient? If additional information is required, can DWER advise? Condition 10 should now refer to Condition 7.	The Delegated Officer reviewed the comments and has amended the reporting requirement to reflect this.
Records and reporting 10	Does DWER keep a record of the calculation of fees payable in respect of the licence?	The Delegated Officer is aware that the calculation of fees payable is a standard licence condition however has agreed to remove this condition.
Records and reporting 14	All the information in Table 3 is included in either the disposal close-out report or the body of the annual PCR. Will DWER accept the PCR as the Annual Environment Report?	Submission date adopted to align with PCR report. Provided that all information outlined by Table 3 is captured in the PCR this may be submitted to comply with the reporting requirements.

Condition	Summary of applicant's comment	Department's response
	<p>If a disposal has occurred, the PCR and close-out report must be submitted to the EPA three months from demobilisation. If the PCR is used for the environmental report this will mean that the PCR must be completed within 60 days. Request that DWER aligns the condition with the EPA timeframe of 3 months as the PCR is a substantial document requiring extensive preparation.</p>	
Definitions	<p>annual period: Annual PCR reporting for the IWDF is from 1 July to 30 June. This PCR reporting is also submitted to RCWA. Request that DWER aligns the reporting period for the licence so that only one report needs to be prepared. This will impact conditions 13 and 14.</p> <p>Emergency Response Equipment: Fire extinguishers, and water in the non-potable water tank are the only ER equipment stored on site. Other ER equipment is waste disposal specific and described in the Operation Health & Safety and Emergency Response Procedures (OHSERP) which are prepared for each disposal and approved by the EPA. The appropriate ER equipment is obtained as part of the disposal operation start-up and mobilisation.</p> <p>OEWP: The current definition refers to two different documents. The OEWP is the Operation Environmental and Waste Acceptance Procedures which provides procedures and information specific to the proposed disposal operation. OP-06 Waste Delivery Acceptance and Disposal is a procedure within the IWDF Environmental Health & Safety and Quality Management System (EHSQMS) and describes the overall process of waste delivery acceptance and disposal in general terms.</p> <p>Performance and Compliance Report: The report on the operation-specific activities carried out at the IWDF is the operation close-out report. The PCR is prepared annually for the 1 July - 30 June reporting period and includes the close-out report if</p>	<p>Request adopted</p> <p>Emergency response equipment list updated.</p> <p>Comments noted</p>

Condition	Summary of applicant's comment	Department's response
	there has been a disposal operation.	
Schedule 1: Maps	Figure 1: There is a typo in Figure 1, Inset 1 where the 2020 cell has been mislabelled 2002NRT01. The licence holder will provide an updated figure to DWER as soon as possible for inclusion in the final licence.	Noted. Map replaced
Definition Table 1	Typographical changes requested.	Changes adopted
Decision Report	Please review grammar, punctuation, and capitalisation throughout. Page numbers restart after the transition from landscape to portrait at page 14 of the PDF. Update Table of Contents once changes are made.	Noted Page numbers and Table of Contents page updated
Cover page	Typographical changes requested	Typographical changes adopted
Shaft burial – page three	Typographical changes requested Disposal, paragraph 6: Change “3-4 layers” to “2-4 layers” Monitoring, paragraph 2: Groundwater sampling is also undertaken pre and post disposal. Monitoring, paragraph 7: Gamma radiation was undertaken annually between 1992 -1999, then subsequently every 5 years. Last gamma radiation monitoring was completed Oct 2017, next due Oct 2022.	Typographical changes adopted
3.1.1 Emission and controls, Table 1	Typographical changes requested Consider including that shaft burial has not been used since 1994 and that this description describes activity 30 years old. It is very unlikely that a shaft would be excavated or constructed in the same way in the future.	Typographical changes adopted

Condition	Summary of applicant's comment	Department's response
3.1.1 Emission and controls, Table 1	Typographical error noted	Corrected
3.2 Risk ratings, Table 3	Typographical changes requested	Typographical changes adopted

Appendix 2: Application validation summary

Application type						
1.1	Check that the type of application being applied for, as indicated in the first section of the <i>IR-F01</i> application form is for a renewal Yes . <input checked="" type="checkbox"/> No <input type="checkbox"/>					
	Renewal	<input checked="" type="checkbox"/>	Current licence No. & expiry date:		L8190/2007/1 Expiry Date: 17/02/2022	
Prescribed premises categories			Yes	No	Proposed Action / Notes (if applicable)	
1.3	Has the applicant specified all prescribed premises categories that are relevant to the activities on the premises?		<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Prescribed premises category and description			Proposed production or design capacity			
Category 66: Class V intractable landfill site: premises on which waste (as determined by reference to the waste type set out in the document entitled "Landfill Waste Classification and Waste Definitions 1996" published by the Chief Executive Officer and as amended from time to time) is accepted for burial.			Not applicable			
Verification			Yes	No	Proposed Action / Notes (if applicable)	
1.4	Has a response been provided to all applicable sections of the application form?		<input checked="" type="checkbox"/>	<input type="checkbox"/>		
1.5	Date application received:		16/11/2021			
1.6	Date assigned to Ind reg Officer		16/11/2021			
1.7	HPRM file reference number:		DWERDT527417 – 2012/006884~1			
Applicant Details						
2.1	Valid applicant name provided		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	Previously- occupier name was Department of Finance, however following legal advice occupier name will now be Minister for Works C/- Department of Finance
	Valid ACN provided		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	.
2.2	Trading name provided		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2.3	Accurate authorised representative details provided		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Consent given to correspondence being exclusively via email		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.4	Physical address for notices served under the EP Act provided		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.5	Postal address for correspondence provided		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

2.6	Contact person details for DWER enquiries related to the application provided	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.7	Occupier status proven	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Attachments					
2.8	Proof of occupier status provided	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.9	ASIC current company information extract provided	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2.10	Authorisation to act as representative of the occupier provided	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Premises details					
3.1	Legal land description provided for all areas proposed to be included within the prescribed premises boundary	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Premise street address provided	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Premises name provided	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.2	Local Government Authority area correctly identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Shire of Coolgardie
3.3	Accurate GPS or map coordinates provided to identify the premises	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.1 & 4.2	Infrastructure, equipment and proposed activities described in application	<input checked="" type="checkbox"/>	<input type="checkbox"/>		description of infrastructure provided
4.8	Maximum production or design capacity for each category matches existing licence	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Not applicable
4.9	Estimated actual throughput provided	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Other Approvals and Consultation					
6.2	Premises has EPA approval? Provide MS number and Report number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		MS562
6.3 & 6.4	Does clearing permit exist for the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>		No permit required. Existing licence
	If "yes", specify:	Clearing permit number:			
6.5	Does groundwater well licence or surface water permit exist for the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>		licence not required
	If "yes", specify:	GWL or SWL number:			
7.1, 7.2 & 7.3	Considered as a major project, State Agreement Act and lead agency framework.	Not a major project, existing licence renewal			
			<input checked="" type="checkbox"/>		Existing licence
7.4	Has the proposal been referred and/or assessed under the EPBC Act?	<input type="checkbox"/>	<input checked="" type="checkbox"/>		N/A
	If "yes", specify:	EPBC approval number:			
7.5 & 7.6	Has the Applicant obtained all relevant planning approvals or mining approvals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Planning approval not required. Planning still valid
	.				
7.7	Has the proposal obtained all other necessary statutory approvals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

7.8	Have all identified direct interest stakeholders been invited to make representations during the consultation period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Existing licence
Attachments					
7.9	Has the applicant provided details of other approvals specified in Part 7 and consultation documentation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No further approval required till 8 February 2023 (Radiological Council Registration) & Permit to Possess Nuclear Materials will expire on 30 November 2024.
Attachments					
7.9	SM approval obtained for licence tenure less than 20 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emissions and discharges and environmental siting of premises					
Part 9	Have all emission and discharges been identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Part 10	Have all nearby environmental receptors and receiving environments been considered?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Existing licence, only administrative renewal

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

2022 – 2023 Management Plans



ENVIRONMENTAL, HEALTH AND 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 and management of the IWDF, Mt Walton East eleven Management Plans have been developed.

These Management Plans provide a summary of the methods and controls that are in place, and must be maintained, to achieve ongoing management goals and targets and 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 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 appropriate training of all personnel.

Management Goal:

To effectively manage air quality at the IWDF.

Management Objective:

To ensure dust and air emissions are monitored and managed effectively to minimise potential risks to health and 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.
- If required, manage hazardous atmospheres in disposal cell.

Improvement Program:

Nil

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.
- OHSER 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 March 2011).
- State of Western Australia (Department of Mines, Industry Regulation and Safety) (2022) Work Health and Safety Commission, Confined Spaces: Code of Practice. 55p.
- AS / NZS 3580.10.1: 2016 Methods for Sampling and Analysis of Ambient Air - Determination of particulate matter - Deposited matter - Gravimetric method. (Currency checked May 2023)
- AS / NZS 3580.1.1: 2016 Methods for Sampling and Analysis of Ambient Air - Guide to siting air



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO. 1
INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST
AIR QUALITY

monitoring equipment. (Currency checked May 2023)

- AS / NZS 3580.9.13:2022 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. (Standard revised March 2022).

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 shall 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 and downwind.
- If hazardous atmospheres are suspected air monitoring shall be conducted in a trench more than 1.2 m deep.

Reporting:

Annual Performance and Compliance Report

Key Responsibilities:

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



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2A
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 by the FMC and assessed by a botanist every ten years. Assessment by a botanist should be next undertaken in October 2024.
- Upon completion of site works temporary infrastructure shall be removed.
- Disused tracks and 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) – located within FMC EHSQMS.
- Proposed Final Cover for Waste Disposal Cells at the Intractable Waste Disposal Facility, Mt Walton East (Clayvault WA, May 2014, reviewed 2019). RCWA approval received 17 February 2022. Review of rehabilitation scenarios required every five years.

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.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2A
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST
DECOMMISSIONING AND REHABILITATION - A
OPERATION SPECIFIC AND ONGOING

Performance Monitoring:

- 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 2023))

Reporting:

Annual Performance and Compliance Report - monitoring results for the reporting period

Key Responsibilities:

- FMC Site Personnel: Annual Monitoring
- Botanist: Rehabilitation Progress Status

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2B
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 and 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 and decommissioned in manner which restores the original ecosystem.

Management Target:

- Re-establish removed and disturbed indigenous habitats to their original level of species diversity.
- All site infrastructure removed.

Management Program:

- A decommissioning statement will be prepared six months prior to decommissioning.
- Proposed Final Cover for Waste Disposal Cells at the Intractable Waste Disposal Facility, Mt Walton East (Clayvault WA, May 2014, reviewed 2019) RCWA approval received 17 February 2022. Review of rehabilitation scenarios required every five years.
- 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:

- Nil



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2B
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY
DECOMMISSIONING AND REHABILITATION - B
LONG TERM AND SITE CLOSURE

Relevant Documents and Procedures:

- Environmental Procedure EP-05: Rehabilitation Management (includes veg completion criteria).
- Decommissioning and Rehabilitation Plan (to be developed 6 months prior to closure).

Forms:

- IWDF Form 38a: Rehabilitation Monitoring Record.
- IWDF Form 39: Monitoring Register.
- Monitoring location figure showing vegetation photo point, groundwater monitoring and priority flora locations.

Performance Monitoring:

- Botanist: Inspect the progress of vegetation rehabilitation every ten years – next due Oct 2024
- IWDF Project Manager: Monitoring of rehabilitation every 12 months (in spring) next due Oct 2023.

Reporting:

Annual Performance and Compliance Report

Key Responsibilities:

IWDF FMC Project Manager: coordinate development of Decommissioning Statement and Rehabilitation Plan when required.

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 3
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST
EMERGENCY RESPONSE

Environmental, Health, Safety and Quality 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 EHSQMS, the Environmental, Health and Safety and Quality 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 prevent and effectively manage emergency incidents at the IWDF.



Management Objective: To ensure emergencies are responded to and managed effectively and efficiently.
Management Target: <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.•
Management Program: <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.
Improvement Plan: Nil
Relevant Documents and Procedures: <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• State Hazard Plan: Hazardous materials emergencies (HAZMAT)
Forms: <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.
Performance Monitoring: Review and assessment of effectiveness of corrective actions
Reporting: <ul style="list-style-type: none">• Close-out Report• Annual Performance and Compliance report, operational specific incidents, and other incidents such as fires outside operations.•



Key Responsibilities:

- 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, Safety and Quality 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 EHSQMS, the Environmental, Health and Safety and Quality Policy and 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 kit to be regularly updated (to be reviewed October 2023).
- Weed identification kit to be regularly reviewed (to be reviewed October 2023)

Improvement program:

Nil



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

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.

Forms:

- Location map of priority species, groundwater, trench capping and rehabilitation monitoring locations.

Performance Monitoring:

Flora (and Fauna) surveys as required.

Reporting:

Identification of new priority or rare species – Department of Water and Environmental Regulation (DWER).

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, Safety and Quality 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 EHSQMS, the Environmental, Health and Safety and Quality 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.



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

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:

- Comply with Operation Health and Safety and Emergency Response Procedures.
- IWDF health and safety processes and procedures comply with the *Work Health and Safety Act, 2020* (WHS Act) and accompanying regulations.
- Maintain a Health and 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, and all personnel are adequately trained.
- Hold safety management briefings, as appropriate to activities.
- Undertake regular site safety inspections and operation safety audits.
- Replace fire extinguishers every 5 years. Last replaced Jan 2020, due to be replaced Jan 2025.

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.



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

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:

- Safety Manager and Operations Manager: training, management, and implementation on site.
- 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.



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

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 limits for the public and occupational limits for workers.
- Comply with *Code for Disposal Facilities for Solid Radioactive Waste*, (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 (RCWA) shall approve the design of the disposal trench.
- Radioactive waste will be placed in the disposal cell in accordance with the RCWA 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 and wear personal radiation monitors.
- Predisposal, and post disposal occupational radiation monitoring shall be undertaken.
- Predisposal and post disposal environmental radiation monitoring shall be undertaken.
- Monitoring program for public dose constraint shall be undertaken.
- 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 Oct 2022.
- 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 the new code has been released compliance with the 1993 CoP is still required as it is called up in s31A of the Radiation Safety Regulations, 1983 and the Radiological Council registration.

Improvement Program:

- Investigate appropriate below ground markers before next disposal of radioactive waste.
- Complete procedure for providing public access to database.
- Complete Operation and Closure Safety Assessment and Safety Case (Operations Safety Assessment V4 Feb 2023, Post-closure Safety Assessment V5 Jan 2023 and Facility Safety Case V4, Mar 2023 submitted to RCWA for approval February and March 2023 to date no feedback has been received).
- Document analysis of the behaviour of the cement matrix.



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

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.
- Operations Safety Assessment V4 Feb 2023, Post-closure Safety Assessment V5 Jan 2023 and Facility Safety Case V4, Mar 2023.

Forms:

- Personal Radiation Monitoring form PRM-1: External Worker Dose
- Personal Radiation Monitoring form PRM-2: Personal Air Sampling
- Personal Radiation Monitoring form PRM-3: Dust Concentrations
- Personal Radiation Monitoring form PRM-4: Internal Worker Dose
- Personal (Worker) Radiation Monitoring form PRM-5: External TLD Dose
- Personal (Public) Radiation Monitoring form PRM-6: External TLD Dose

Performance Monitoring:

- Pre-burial environmental radiation monitoring of disposal area.
- Post-burial environmental radiation monitoring of the disposal compound.
- On-going environmental gamma radiation monitoring of disposal compounds – next 5 yearly monitoring to be undertaken in October 2027.
- Occupational radiation monitoring.
- Dose constraint monitoring.

Reporting:

- Radiological Council: copy of each radiation monitoring report and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NHMRC, 1993).
- Community Liaison Committee: copy of each radiation monitoring report and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NHMRC, 1993).
- EPA: Annual Performance and Compliance Report which will include a copy of all radiation monitoring for relevant reporting periods and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NHMRC, 1993) when completed.

Key Responsibilities:

Radiation Safety Officer – radiation monitoring



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 7
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST
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 EHSQMS, the Environmental, Health and Safety and Quality Policy and operational activities at the IWDF, through a process of continual review.

Management Goal:

To effectively manage the transport of waste to the IWDF.

Management Objective:

To ensure waste is transported in a manner which minimises any potential risks to humans or the environment.

Management Target:

- 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 and Emergency Services (DFES), Department of Mines, Industry Regulation & Safety (DMIRS), and the local government authorities 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.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 7
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST
TRANSPORT

- 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, and environmental protection by ensuring the adequacy of the EHSQMS, the Environmental, Health and Safety and Quality 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.



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

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 and 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
- Monitoring Bore Location Figure and site contour maps

Improvement Program:

Nil

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.

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.
- Project Manager – annual performance and compliance reporting.



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 Operation Environmental and Waste Acceptance 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.



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

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/Radiological Council: Performance and Compliance Report.
- EPA/Radiological Council: 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 and outcomes and ensure that all disposal details and monitoring records/auditing records, are both publicly available and 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 waste inventory database 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, and provide input into operational decision making. Note: At the October 2021 CLC meeting the CLC agreed to reduce the frequency of meetings to three meetings a year. Ministerial Statement 562 remains unchanged.
- Ensure information regarding the IWDF on Government web page for the IWDF – handbook, brochure etc. is always up to date.

Improvement Program:

- Publicly available waste disposal spreadsheet on the Government web page for the IWDF.



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

Relevant Documents and Procedures:

- IWDF Waste Inventory Database/publicly available spreadsheet
- Management Procedure: MP-05 Communication and Public Relations
- Management Procedure: MP-07 Management of Records
- IWDF Complaints Register
- DA 2011-049 Retention and Disposal Schedule for the Department of Finance

Forms:

Nil – replaced by DA 2011-049 Retention and Disposal Schedule for the Department of Finance.

Performance Monitoring:

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

Reporting:

- Annual Performance and Compliance Report
- Radiological Council: Annual Radiological Report (Radiological Council have specified that they will accept submission of Annual Performance and Compliance Report 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 EHSQMS, the Environmental, Health and Safety and Quality 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.



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

Management Target:

- Operation and management of IWDF complies with all regulatory requirements and conditions and commitments.
- EHSQMS 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 and submit to the Environmental Protection Authority, Department of Water and Environmental Regulation and Radiological Council.
- Correct non-conformances as soon as possible and 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 Performance and Compliance Reports to the 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



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

Performance monitoring:

Management Review Meetings

Reporting:

- Management Review Meetings.
- 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		MT
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		MT
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 /NYS standards checked for currency May 2021.	LM	MT	MT
23	03/11/21	General formatting changes to all plans, update to dates for monitoring events etc., Policy statement updated to reflect current naming conventions in plans	LM	MT	MT



		3,4,5,7,8, and 11. Plan 11 new Improvement Plan item, Plan 9 updated item in Management Target section, where improvements plans were completed, action was moved to Management Program for ongoing maintenance			
24	07/02/22	Update to Plan 5 to include requirement for fire extinguisher replacement.	LM	MT	MT
25	12/05/22	Plan 1 update to AS / NZS 3580.9.13. Plans 2a and 2b updated to include Final Cover approval from RCWA	LM	MT	MT
26	03/12/22	Plan 1 updated to include Confined Spaces CoP, 2a&b dates updated, 4 monitoring dates updated, 5 update to Improvement Program and Key Responsibilities, 6 update to Management Target, Management Program, and Performance Monitoring to include safe limits for the public. 10 Relevant Docs & Procedure and Forms updated to include Finance R&D Schedule. Update to Finance branding.	LM	MT	MT
27	06/06/23	Minor formatting changes. Plan 6 Relevant Documents and Procedures updated with Operations Safety Assessment V4 Feb 2023, Post-closure Safety Assessment V5 Jan 2023 and Facility Safety Case V4, Mar 2023. Plan 6 Forms updated to include corrected form numbers and titles.	LM	MT	MT

APPENDIX F

2022 – 2023 Groundwater Monitoring Records

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

SAMPLING/GROUNDWATER MONITORING RECORD FORM IWDF-FORM-03b

Project No.: DF12022-009-ANMO		Location of Retained Samples: <u>N/A</u>				Sampled By: <u>MJS/SP</u>		
Site Name: Intractable Waste Disposal Facility, Mt Walton East								
Location: IWDF								
Operation/Project: Monitoring	Date: <u>17/5/2023</u>	Sample Description and any Observations	Container Type	Preservation				
Sample/Bore No.	Groundwater depth (if applicable)	Sample* Depth	Sampling Date	Sampling Time*	CoC No.	Sample Destination	Disposal Date	Collection Procedure
GM1	<u>37.995</u>	<u>DRY</u>						<u>DRY</u>
GM2	<u>40.653</u>	<u>DRY</u>						<u>DRY</u>
GM3	<u>39.110</u>	<u>DAMP</u>						<u>MINOR DAMPNESS</u>
GM4	<u>30.078</u>	<u>DRY</u>						<u>DRY</u>
GM5	<u>28.006</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>31.395</u>	<u>DRY</u>						<u>DRY</u>
GM9	<u>42.118</u>	<u>DRY</u>						<u>DRY</u>

GENERAL COMMENTS:

WATER PROBE TESTED YES SIGNED: MJ Shepherd
 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	GM 1-9	DRY	N/A
12 APRIL	2016	YES	GM 1-9	DRY	N/A
18 OCTOBER	2016	YES	GM 1-9	DRY	N/A
20 APRIL	2017	YES	GM 1-9	DRY	N/A
17 OCTOBER	2017	YES	GM 1-9	DRY	N/A
19 APRIL	2018	YES	GM 1-9	DRY	N/A
25 OCTOBER	2018	YES	GM 1-9	DRY	N/A
2 APRIL	2019	YES	GM 1-9	DRY	N/A
24 OCTOBER	2019	YES	GM 1-9	DRY	N/A
2 FEBRUARY	2020	YES	GM 1-9	DRY	N/A
9 APRIL	2020	YES	GM 1-9	DRY	N/A
30 OCTOBER	2020	YES	GM 1-9	DRY	N/A
31 MARCH	2021	YES	GM 1-9	DRY	N/A
13 OCTOBER	2021	YES	GM 1-9	DRY	N/A
5 APRIL	2022	YES	GM 1-9	DRY	N/A
18 OCTOBER	2022	YES	GM 1-9	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

Project No.: DF12022-009-ANMO		Location of Retained Samples: <u>N/A</u>		Sampled By: <u>MJS/SP</u>							
Site Name: Intractable Waste Disposal Facility, Mt Walton East		Operation/Project: Monitoring		Date: <u>18/10/2022</u>							
Location: IWDF		Collection Procedure		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	Sample Description and any Observations	Container Type	Preservation
GM1	37.993	DRY							DRY		
GM2	40.657	DRY							DRY		
GM3	39.120	MOIST							MINOR AT BASE (1cm)		
GM4	30.078	DRY							DRY		
GM5	28.058	DRY							DRY		
GM6	25.905	DRY							DRY		
GM7	31.564	DRY							DRY		
GM8	31.400	DRY							DRY		
GM9	42.117	DRY							DRY		

GENERAL COMMENTS: —

WATER PROBE TESTED YES SIGNED: MJ Shepherd

Duplicate Sample Yes No (N/A) Field Blanks Yes No (N/A) Original to file. Copy to Finance Project Manager within 14 days.

APPENDIX G

2022 – 2023 Site Visit Checklist

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: 17/5/2023 - 19/5/2023	
Time Arrived: 1635	Time Departed: 0845

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"/>	2/3 FULL
Water - non-potable	<input checked="" type="checkbox"/>	EMPTY
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"/>	
Kitchen/toilet operational	<input checked="" type="checkbox"/>	
Weather station intact	<input checked="" type="checkbox"/>	DISUSED
Phone & internet operational	<input checked="" type="checkbox"/>	DISUSED - USE MOBILE SAT PHONE
Above ground markers intact	<input checked="" type="checkbox"/>	
Maintenance		
Electrical tagging up to date	<input checked="" type="checkbox"/>	
Fire extinguishers checked	<input checked="" type="checkbox"/>	
Generator serviced	<input checked="" type="checkbox"/>	DUE FOR A SERVICE
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: 0745
Confirmed safe return: YES		Time: 1440
Signed: Mg/Shepherd		Date: 19/5/2023

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, REHABILITATION, CAPPING + RADIATION MONITORING	
Visitor/Inspector: MJS	Affiliation: AMRORA ENVIRONMENTAL
Other Visitors (at least one other person to be at site): SP+JM	
Date: 17/10/2022 - 20/10/2022	
Time Arrived: 2015	Time Departed: 1230

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"/>	4/5 FULL
Water - non-potable	<input checked="" type="checkbox"/>	1/5 FULL
Food/provisions/domestic supplies	<input checked="" type="checkbox"/>	NEED HANDWASH + PAPER TOWELS
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"/>	2020 NRT01 SIGN NOW IN PLACE
Infrastructure		
Fire extinguishers in place	<input checked="" type="checkbox"/>	
Generator operational	<input checked="" type="checkbox"/>	
Kitchen/toilet operational	<input checked="" type="checkbox"/>	
Weather station intact	<input checked="" type="checkbox"/>	UNSERVICEABLE
Phone & internet operational	<input checked="" type="checkbox"/>	MOBILE SAT PHONE NOW USED
Above ground markers intact	<input checked="" type="checkbox"/>	
Maintenance		
Electrical tagging up to date	<input checked="" type="checkbox"/>	DONE 18/10/2022
Fire extinguishers up to date	<input checked="" type="checkbox"/>	NEED TESTING (1 LARGE TO PERM FOR TEST)
Generator serviced	<input checked="" type="checkbox"/>	NEEDS SERVICE (CHECK TRIP SWITCH)
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"/>	FIREBREAK TREATED
Other (specify)	<input checked="" type="checkbox"/>	
Post-Visit Check		Time Departed: 0845
Confirmed safe return: YES		Time: 1600
Signed: MJ Shepherd		Date: 20/10/2022

Original to FMC Project Manager. Copy to Finance IWDF Project Manager.

APPENDIX H

2022 Environmental Gamma Radiation Survey for the IWDF

2022 Environmental Gamma Radiation Survey for the Intractable Waste Disposal Facility (IWDF)



Prepared For: Department of Finance

Report Number: AP2022-303

Report Version: V1

Report Date: 22 December 2022

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Document No: DFI2022-009_ANMO_001_MJS_V1

Report No: AP2022-303

Author: Mark Shepherd
General Manager



22 December
2022

Signature

Date

Reviewed by: Stuart Parr
IWDF RSO



22 December
2022

Signature

Date

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EXECUTIVE SUMMARY

The Minister for Works care of the Department of Finance is the proponent for the Intractable Waste Disposal Facility (IWDF) in Western Australia. Some of the waste residues disposed of at the IWDF contain radioactive substances including sealed radiation sources, exit signs, smoke detectors and Naturally Occurring Radioactive Material (NORM), in the form of traces of uranium and thorium decay products.

As part of the ongoing monitoring requirements for the IWDF, environmental gamma monitoring must be undertaken every five (5) years in accordance with the requirements of the Radiological Council of Western Australia (RCWA) and the *IWDF Environmental, Health, Safety and Quality Management* arrangements [1].

An environmental gamma radiation survey for the IWDF was undertaken on behalf of Finance. The radiation survey was undertaken in accordance with the requirements of *Radiation Instruction RI-01* [2] and *RI-02* [3], and in agreement with the *Radiation Safety (General) Regulations 1983* [4].

This document presents the results of the environmental gamma radiation survey that was conducted on the 18th and 19th October 2022 at the site, see [Table 2](#).

The site visit also included any observations made of the site infrastructure and facilities to ensure compliance with the *Radiation Safety (General) Regulations 1983* [4].

It can be seen from the results in [Table 3](#), that the absorbed gamma radiation levels in 2022 are consistent with the previous surveys and that the levels have remained constant throughout each of the radiation cell compounds.

The median results range from 0.11-0.16 $\mu\text{Gy/h}$ (0.08-0.11 $\mu\text{Sv/h}$) are in very good agreement with the typical gamma dose rate levels for the Perth Coastal Plain which has a range of 0.05 to 0.19 $\mu\text{Sv/h}$ depending on local geological characteristics (*Toussaint, 1985*) [5] and (*Efendi and Jennings, 1994*) [6] and the average levels for Australia of 0.10 $\mu\text{Sv/h}$ (based on an annual gamma dose of 0.9 mSv [7]). The radiological conditions for the IWDF have remained stable and are at normal background radiation levels, and therefore present no health risks to the public or the environment.

1 INTRODUCTION

1.1 GENERAL

The Intractable Waste Disposal Facility Mt Walton East (IWDF) is Australia's first long-term disposal site for intractable waste. The IWDF is owned by the State Government (the proponent is the Minister for Works care of the Department of Finance) and can only be used for intractable waste generated in Western Australia. The site lies about 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 IWDF is by a 100-kilometre unsurfaced road that extends northward from Boorabbin siding on Great Eastern Highway. The Facility was established in 1992 and is categorised as a Class V (Intractable) landfill site that forms an important part of the State's waste management infrastructure. It provides a secure and long-term disposal option for the State's low-level radioactive, chemical, and other intractable wastes. Intractable wastes are materials that are a management problem by virtue of their toxicity or chemical or physical characteristics which make them difficult to dispose of or treat safely. Intractable wastes include radioactive wastes which need time to break down or decay to safe levels for the environment, and chemical wastes including industrial by-products like arsenic trioxide, sheep dip and pesticides which contain hazardous chemicals that cannot be easily destroyed. Intractable wastes have no commercially viable recycling, reuse or disposal options and therefore require secure and permanent isolation under a long-term management structure for public and environmental protection.

The IWDF has been registered for the disposal of radioactive wastes under *RS 13/2011 20590* [8] with the Radiological Council of Western Australia (RCWA), subject to conditions, restrictions, and limitations [9] under *Section 36* of the *Radiation Safety Act, 1975* [10].

Under the terms of the Registration, environmental gamma radiation surveys must be undertaken every five years and post a radioactive disposal campaign. The last survey was undertaken in September 2017 [11]. The latest survey was undertaken on the 18th and 19th October 2022 with the results presented and discussed in this report.

1.2 SCOPE

This report presents the findings of the environmental gamma radiation survey undertaken, in accordance with the terms of the site Registration *RS 13/2011 20590* [8], on the 18th and 19th October 2022.

The gamma radiation survey was undertaken in accordance with the requirements of *Radiation Instruction RI-01* [2] and *RI-02* [3], and in agreement with the *Radiation Safety (General) Regulations 1983* [4].

2 SITE DESCRIPTION

The IWDF lies within the Shire of Coolgardie and is 75km northeast of Koolyanobbing and approximately 170km northwest of Kalgoorlie. The site occupies Crown Reserve No. 42001, which covers 25km² and is accessed by a 100km long, dedicated road (Crown Reserve No. 44102) that extends northward from the Boorabbin Siding on Great Eastern Highway ([Figure 1](#)). The IWDF is managed by the Facilities Management Contractor (Aurora Environmental) for the proponent, the Minister for Works care of the Department of Finance; its operation is governed by the Minister for the Environment, and it is owned by the Government of Western Australia.

The *Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)* [12] defines the site selection criteria for near surface disposal of radioactive waste. The criteria are summarised as:

- geological stability
- remoteness
- arid climate (with evaporation exceeding rainfall by ten times)
- lack of groundwater
- presence of clay to limit the potential for migration of wastes
- lack of potential for flooding
- lack of potential for mineral resources
- lack of potential for agriculture
- absence of human population, or potential for human population
- lack of special environmental features
- absence of known rare species or ecosystems
- lack of special cultural or historical significance.

The Mt Walton East site is an ideal location for the IWDF because it meets all the above criteria. The remoteness of the site was chosen as much to allay community fears as to reduce the risk from disposal operations.

Mt Walton East was chosen as the preferred site for the IWDF after extensive scientific investigations. Studies proved that the site had no significant environmental, historical, or cultural characteristics or known rare species or ecosystems. The geology of the site was assessed by using geophysics and drilling. The results showed that there was no permanent groundwater and that the underlying geology consisted mostly of clay down to the granite bedrock.

[Figure 2](#) shows the layout of the site, with the Radioactive Waste Disposal Area lying about 400m to the west of the access road and the Chemical and Radioactive Waste Disposal Area lying 2km to the east of the access road. [Figure 2](#) also shows the disposal cells which contain radioactive waste and the locations of the gamma radiation measurements taken during the monitoring event.

3 METHODOLOGY

3.1 UNCERTAINTY BUDGET

An uncertainty budget is an aid for specifying the expanded measurement uncertainty, which is the expression of the statistical dispersion of the values attributed to a measurement quantity. All measurements are subject to uncertainty and a measurement result is complete only when it is accompanied by a statement of the associated uncertainty, such as the standard deviation. Overall uncertainty in dose rate readings is a product of the standard deviation of the readings and the uncertainty of the measurement. Factors that contribute to the uncertainty of the measurement at such low intensities (because the gamma radiation is very low) are calibration of the instrument, energy and angular dependence, environmental factors, scale resolution and reading parallax (for digital instruments parallax and scale resolution are assumed to be zero).

The overall uncertainty budget is outlined below.

Calibration Uncertainty: For the Radeye instrument used in the monitoring program the calibration uncertainty is 10% with a normal distribution.

Energy and Angular Dependence: Using the IEC standard IEC 60846-1 Ed. 1.0 [13], the energy and angular dependence for this work and with this instrument will be 25% with a rectangular distribution.

Environmental Factors: For the instrument used, under normal working conditions, the uncertainty from environmental factors should be no more than 10% with a rectangular distribution.

Standard Deviation: For a 95% confidence level the following formula can be used to calculate the standard deviation of the time averaged readings.

$$u(H^*[10]) = \frac{\Delta H^*[10]}{H^*[10]}$$

$$\Delta H^*[10] = \frac{2 \times \sqrt{CPM}}{CPM} \times H^*[10]$$

Where u is the standard uncertainty, $H^*[10]$ is the ambient dose equivalent and cpm is the time averaged reading in counts over a one-minute period and $\Delta H^*[10]$ is the uncertainty. This uncertainty has a normal distribution.

The overall combined standard uncertainty u_{total} (with a normal distribution) can then be calculated with the following equation:

$$u_{total} = \sqrt{\sum \left(\frac{u(i)}{z}\right)^2}$$

Where $u(i)$ are the uncertainty sources detailed above and z is the probability divisor (1 for normal

distributions and 1.73 for rectangular distributions). This gives a total uncertainty for a confidence level of 95% as shown in [Table 2](#) and [Table 3](#).

3.2 ENVIRONMENTAL GAMMA MONITORING

Environmental gamma radiation levels were monitored using a Radeye GX with an MC-71 MHV probe ([Figure 3](#)). Counts were recorded for a period of one (1) minute, on three occurrences, to obtain an aggregate count, measured at one (1) metre above ground ([Table 1](#)).

The measured absorbed gamma dose rates in air ($\mu\text{Gy/h}$) are summarised in [Table 2](#), at the centreline and at the perimeter of each cell containing radioactive waste. [Table 3](#) also includes the average absorbed doses at the centreline and perimeter, together with a comparison of the previous absorbed doses as measured in September 2017 [11].

A calibration factor of 0.00089 $\mu\text{Gy/h/cpm}$ was used to convert counts in 1 minute to $\mu\text{Gy/h}$, based on the calibration certificate as shown in [Appendix 1](#).

Table 1: Ongoing Monitoring Regime for the IWDF Site

Survey	Site/ Locations	No. of Locations	Duration (min)	Frequency	Technique
Gamma	See Figure 2	See Table 2	3-by 1-minute counts will be taken at each location	5-yearly as part of periodic reporting to the Radiological Council for ongoing site conditions	Using rate-meter (Radeye GX) with large volume, energy compensated environmental GM, (MC-71 MHV probe), and GPS for locations. Measurements taken @ 1m above ground

Table 2: Gamma Radiation Levels in and around the Radiation Cell Compounds at the IWDF (18th and 19th October 2022)

Code	Location	GPS-E	GPS-N	Mean Count (1 min)	Absorbed Dose Rate ($\mu\text{Gy/h}$) ^a	Previous Survey (2017)
	Compound One (92RS01 and 94RS01)					
G1	Above 92RS01 North	225747	6635801	192	0.17 \pm 0.04	0.18
G2	5m N of 01	225746	6635808	178	0.16 \pm 0.04	0.19
G3	5m W of 01	225745	6635799	166	0.15 \pm 0.04	0.17
G4	5m S of 01 (W of 02)	225750	6635793	178	0.16 \pm 0.04	0.17
G5	5m E of 01 (N of 02)	225754	6635800	181	0.16 \pm 0.04	0.17
G6	Above 94RS01 South	225751	6635797	183	0.16 \pm 0.04	0.18
G7	5m S of 02	225754	6635791	155	0.14 \pm 0.03	0.16
G8	5m E of 02	225758	6635796	185	0.16 \pm 0.04	0.16
G9	Perimeter NE	225793	6635815	175	0.16 \pm 0.04	0.11
G10	Perimeter SE	225797	6635787	117	0.10 \pm 0.03	0.10
G11	Perimeter S mid	225761	6635786	117	0.10 \pm 0.03	0.11
G12	Perimeter SW	225729	6635785	120	0.11 \pm 0.03	0.10
G13	Perimeter NW	225728	6635812	155	0.14 \pm 0.03	0.14
G14	Perimeter N mid	225761	6635814	137	0.12 \pm 0.03	0.12
		Average Centreline		180	0.16 \pm 0.04	0.17
		Average Perimeter		136	0.12 \pm 0.03	0.11
	Compound Two (94RT01)					
G15	East Centreline Cell	225771	6635855	139	0.12 \pm 0.03	0.15
G16	Centreline Cell	225767	6635854	139	0.12 \pm 0.03	0.12
G17	Centreline Cell	225760	6635853	148	0.13 \pm 0.03	0.12
G18	Centreline Cell	225757	6635852	145	0.13 \pm 0.03	0.13
G19	Centreline Cell	225751	6635853	127	0.11 \pm 0.03	0.12
G20	West Centreline Cell	225747	6635852	128	0.11 \pm 0.03	0.12
G21	Perimeter NE	225774	6635863	126	0.11 \pm 0.03	0.12
G22	Perimeter SE	225777	6635851	121	0.11 \pm 0.03	0.11
G23	Perimeter SW	225745	6635843	118	0.10 \pm 0.03	0.10
G24	Perimeter NW	225743	6635855	136	0.12 \pm 0.03	0.11
	Perimeter S mid	225758	6635847	122	0.11 \pm 0.03	0.12
	Perimeter N mid	225757	6635860	115	0.10 \pm 0.03	0.13
		Average Centreline		135	0.12 \pm 0.03	0.13
		Average Perimeter		122	0.11 \pm 0.03	0.12
	Compound Three (2000RT01)					
	South Centreline Cell	227684	6635792	181	0.16 \pm 0.04	0.16
G25	Centreline Cell	227683	6635807	179	0.16 \pm 0.04	0.17
G26	Centreline Cell	227683	6635822	162	0.14 \pm 0.04	0.17
G27	Centreline Cell	227682	6635837	174	0.16 \pm 0.04	0.16
G28	Centreline Cell	227682	6635852	178	0.16 \pm 0.04	0.17
G29	Centreline Cell	227680	6635867	173	0.15 \pm 0.04	0.16
G30	Centreline Cell	227681	6635881	174	0.15 \pm 0.04	0.16
	North Centreline Cell	227680	6635904	168	0.15 \pm 0.04	0.15

Code	Location	GPS-E	GPS-N	Mean Count (1 min)	Absorbed Dose Rate ($\mu\text{Gy/h}$) ^a	Previous Survey (2017)
G31	Perimeter SE	227692	6635790	194	0.17 \pm 0.04	0.18
G32	Perimeter E mid	227693	6635848	180	0.16 \pm 0.04	0.18
G33	Perimeter NE	227692	6635906	183	0.16 \pm 0.04	0.18
G34	Perimeter NW	227667	6635909	192	0.17 \pm 0.04	0.19
G35	Perimeter W mid	227670	6635856	182	0.16 \pm 0.04	0.17
G36	Perimeter SW	227671	6635790	175	0.16 \pm 0.04	0.18
		Average Centreline		174	0.15 \pm 0.04	0.16
		Average Perimeter		185	0.16 \pm 0.04	0.16
	Compound Four (2002RT01)					
G37	South Centreline Cell	227470	6635782	193	0.18 \pm 0.04	0.18
G38	Centreline Cell	227470	6635798	179	0.16 \pm 0.04	0.17
G39	Centreline Cell	227470	6635813	159	0.14 \pm 0.03	0.16
G40	Centreline Cell	227469	6635831	173	0.15 \pm 0.04	0.15
G41	Centreline Cell	227469	6635845	184	0.16 \pm 0.04	0.16
G42	Centreline Cell	227470	6635862	161	0.14 \pm 0.03	0.17
	North Centreline Cell	227469	6635876	176	0.16 \pm 0.04	0.17
G43	Perimeter SE	227486	6635782	193	0.17 \pm 0.04	0.17
G44	Perimeter E mid	227486	6635828	195	0.17 \pm 0.04	0.20
G45	Perimeter NE	227488	6635878	194	0.17 \pm 0.04	0.18
G46	Perimeter NW	227457	6635877	183	0.16 \pm 0.04	0.15
G47	Perimeter W mid	227455	6635828	176	0.16 \pm 0.04	0.17
G48	Perimeter SW	227457	6635781	175	0.16 \pm 0.04	0.16
		Average Centreline		175	0.16 \pm 0.04	0.16
		Average Perimeter		185	0.16 \pm 0.04	0.17
	Compound Five (2008RT01)					
G49	South Centreline Cell	227194	6635792	181	0.16 \pm 0.04	0.15
G50	Centreline Cell	227194	6635809	179	0.16 \pm 0.04	0.17
G51	Centreline Cell	227193	6635824	186	0.17 \pm 0.04	0.16
G52	Centreline Cell	227193	6635840	185	0.16 \pm 0.04	0.16
G53	Centreline Cell	227194	6635855	168	0.15 \pm 0.04	0.17
G54	Centreline Cell	227194	6635871	173	0.15 \pm 0.04	0.17
G55	Centreline Cell	227193	6635884	173	0.15 \pm 0.04	0.16
G56	Centreline Cell	227193	6635901	177	0.16 \pm 0.04	0.17
G57	Centreline Cell	227192	6635915	156	0.14 \pm 0.03	0.17
G58	Centreline Cell	227193	6635930	175	0.16 \pm 0.04	0.17
G59	North Centreline Cell	227193	6635945	179	0.16 \pm 0.04	0.18
G60	Perimeter NW	227180	6635947	176	0.16 \pm 0.04	0.19
G61	Perimeter West Fence, N	227178	6635896	162	0.14 \pm 0.04	0.14
G62	Perimeter West Fence, S	227178	6635841	169	0.15 \pm 0.04	0.17
G63	Perimeter SW	227178	6635791	185	0.16 \pm 0.04	0.17
G64	Perimeter SE	227206	6635792	187	0.17 \pm 0.04	0.17
G65	Perimeter East Fence, S	227206	6635845	183	0.16 \pm 0.04	0.15
G66	Perimeter East Fence, N	227207	6635898	166	0.15 \pm 0.04	0.15
G67	Perimeter NE	227207	6635949	210	0.19 \pm 0.04	0.21

Code	Location	GPS-E	GPS-N	Mean Count (1 min)	Absorbed Dose Rate ($\mu\text{Gy/h}$) ^a	Previous Survey (2017)
		Average Centreline		176	0.16 ± 0.04	0.17
		Average Perimeter		180	0.16 ± 0.04	0.17
	Operational Checks					
G68	Kitchen, Before Survey			161	0.16 ± 0.04	0.16
G68	Kitchen, After Survey			174	0.16 ± 0.04	0.16

^a Using a calibration factor of 0.00089 $\mu\text{Gy/h/cpm}$ to convert counts in 1 minute to $\mu\text{Gy/h}$

Table 3: Summary of Gamma Radiation Levels in and around the Radiation Cell Compounds at the IWDF to Date

Date	Cell	Perimeter	Cell	Perimeter	Cell	Perimeter	Cell	Perimeter	Cell	Perimeter
	92/94RS01	92/94RS01	94RT01	94RT01	2000RT01	2000RT01	2002RT01	2002RT01	2008RT01	2008RT01
Absorbed Dose Rate (μGy/h)										
03/93	0.14 ± 0.01	0.11 ± 0.02								
09/93	0.15 ± 0.01	0.11 ± 0.01								
03/94	0.15 ± 0.01	0.11 ± 0.01								
09/94	0.16 ± 0.02	0.11 ± 0.01	0.13 ± 0.01	0.12 ± 0.01						
02/95	0.17 ± 0.01	0.11 ± 0.01	0.13 ± 0.01	0.12 ± 0.01						
09/95	0.16 ± 0.02	0.12 ± 0.01	0.12 ± 0.01	0.12 ± 0.01						
03/96	0.17 ± 0.01	0.11 ± 0.01	0.12 ± 0.01	0.11 ± 0.01						
08/96	0.16 ± 0.02	0.11 ± 0.01	0.12 ± 0.01	0.12 ± 0.01						
02/97	0.17 ± 0.02	0.11 ± 0.01	0.12 ± 0.01	0.11 ± 0.01						
08/97	0.17 ± 0.02	0.11 ± 0.01	0.12 ± 0.01	0.13 ± 0.01						
02/98	0.17 ± 0.01	0.12 ± 0.01	0.13 ± 0.01	0.12 ± 0.01						
08/98	0.16 ± 0.01	0.12 ± 0.01	0.12 ± 0.01	0.12 ± 0.01						
02/99	0.16 ± 0.01	0.11 ± 0.01	0.12 ± 0.01	0.11 ± 0.01						
04/00	0.16 ± 0.02	0.11 ± 0.01	0.12 ± 0.01	0.11 ± 0.01						
03/02	0.17 ± 0.01	0.11 ± 0.01	0.12 ± 0.01	0.12 ± 0.01	0.15 ± 0.01 ^a	0.18 ± 0.01 ^a				
11/02	0.17 ± 0.01	0.12 ± 0.01	0.12 ± 0.01	0.12 ± 0.01	0.16 ± 0.01	0.19 ± 0.02				
11/07	0.17 ± 0.01	0.11 ± 0.01	0.13 ± 0.01	0.11 ± 0.01	0.16 ± 0.01	0.19 ± 0.01	0.18 ± 0.01 ^b	0.18 ± 0.02 ^b		
11/08									0.17 ± 0.01 ^c	0.18 ± 0.02 ^c
11/12	0.16 ± 0.03	0.11 ± 0.02	0.12 ± 0.02	0.11 ± 0.02	0.16 ± 0.03	0.18 ± 0.03	0.17 ± 0.03	0.17 ± 0.03	0.16 ± 0.03	0.17 ± 0.03
09/17	0.17 ± 0.04	0.11 ± 0.03	0.13 ± 0.03	0.12 ± 0.03	0.16 ± 0.04	0.18 ± 0.04	0.16 ± 0.04	0.17 ± 0.04	0.17 ± 0.04	0.17 ± 0.04
10/22	0.16 ± 0.04	0.12 ± 0.03	0.12 ± 0.03	0.11 ± 0.03	0.15 ± 0.04	0.16 ± 0.04	0.16 ± 0.04	0.16 ± 0.04	0.16 ± 0.04	0.16 ± 0.04
Average	0.16 ± 0.02	0.11 ± 0.01	0.12 ± 0.01	0.12 ± 0.01	0.16 ± 0.02	0.18 ± 0.02	0.17 ± 0.03	0.17 ± 0.03	0.17 ± 0.02	0.17 ± 0.03

^a Post-disposal survey 28 July 2000

^b Post-disposal survey 21 November 2002

^c Post-disposal survey 21 November 2008

4 SUMMARY OF RESULTS AND CONCLUSION

The measured absorbed gamma dose rates in air ($\mu\text{Gy}/\text{h}$) are summarised in [Table 2](#), at the centreline and at the perimeter of each cell containing radioactive waste. [Table 3](#) also includes the average absorbed doses at the centreline and perimeter, together with a comparison of the previous absorbed doses as measured in September 2017 [11].

It can be seen from the results that the absorbed gamma radiation levels in 2022 are consistent with the previous surveys and that the levels have remained constant throughout each of the radiation cell compounds.

The median results range from 0.11-0.16 $\mu\text{Gy}/\text{h}$ (0.08-0.11 $\mu\text{Sv}/\text{h}$) are in very good agreement with the typical gamma dose rate levels for the Perth Coastal Plain which has a range of 0.05 to 0.19 $\mu\text{Sv}/\text{h}$ depending on local geological characteristics (Toussaint, 1985) [5] and (Efendi and Jennings, 1994) [6] and the average levels for Australia of 0.10 $\mu\text{Sv}/\text{h}$ (based on an annual gamma dose of 0.9 mSv [7]). The radiological conditions for the IWDF have remained stable and are at normal background radiation levels, and therefore present no health risks to the public or the environment.

5 REFERENCES

- [1] Government of Western Australia, Department of Finance, Intractable Waste Disposal Facility Mt Walton East, Environmental, Health, Safety and Quality Management System (EHSQMS), Management and Policy Manual, as amended.
- [2] Government of Western Australia, Department of Finance, IWDF Radiation Instruction R1-01, Gamma Radiation Monitoring (as amended).
- [3] Government of Western Australia, Department of Finance, IWDF Radiation Instruction R1-02, Occupational Radiation Monitoring (as amended).
- [4] Government of Western Australia, Radiation Safety (General) Regulations, 1983.
- [5] Toussaint LF (1985) Radiation Protection in Australia 3(4) 151-55 Background Radiation in Western Australia.
- [6] Efendi, Z. and Jennings, P. (1994b). An Assessment of the Environmental Radiation Dose for the Residents of the Perth Metropolitan Area. Radiation Protection in Australia, Vol. 12, No. 1, 1994, pp. 8-12.
- [7] ARPANSA, Fact Sheet – Ionising Radiation and Health, ARPANSA, 2015.
- [8] Radiological Council of Western Australia, Registration No RS 13/2011 20590 Application for Renewal of Registration of Premises in which Radioactive Substances are to be used, stored or manufactured, 2017.
- [9] Radiological Council of Western Australia, Condition No: 114, Certificate No: RS, Radiation Safety Act Conditions, Restrictions and Limitations (Section 36), Disposal of Radioactive Waste at Mt Walton East, 2014.
- [10] Government of Western Australia, Radiation Safety Act, 1975.
- [11] Radiation Professionals, AURO140617_GRS 2017 Environmental Gamma Radiation Survey for the Intractable Waste Disposal Facility (IWDF), 2017.
- [12] ARPANSA, Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia, 1992.
- [13] International Electrotechnical Committee, IEC 60846-1 Ed. 1.0, Radiation protection instrumentation - Ambient and/or directional dose equivalent (rate) meters and/or monitors for beta, X and gamma radiation Part 1: Portable workplace and environmental meters and monitors, 2009.

FIGURES

Figure 1: Regional Location of the IWDF in Western Australia

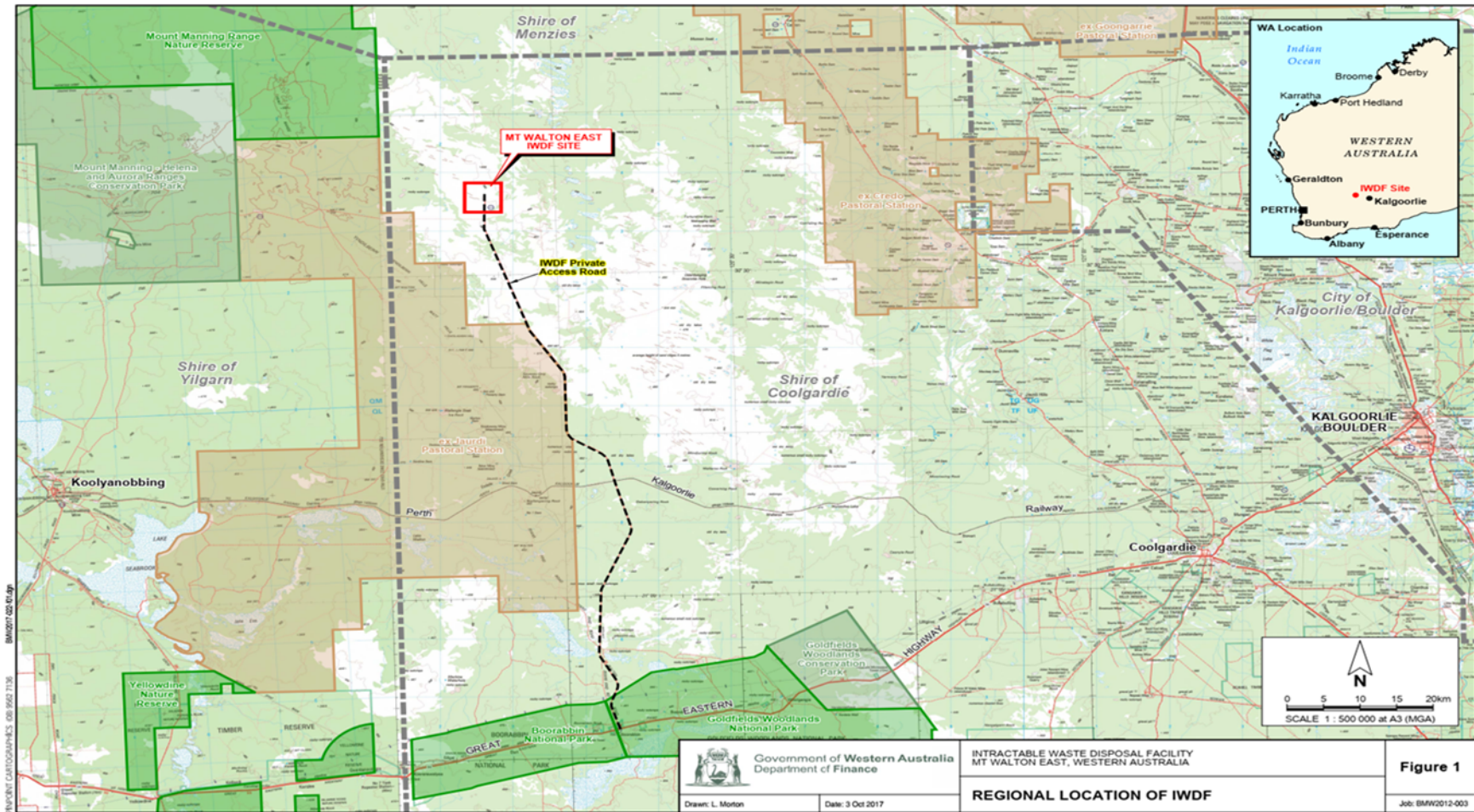


Figure 2: Environmental Monitoring Locations for the IWDF Site

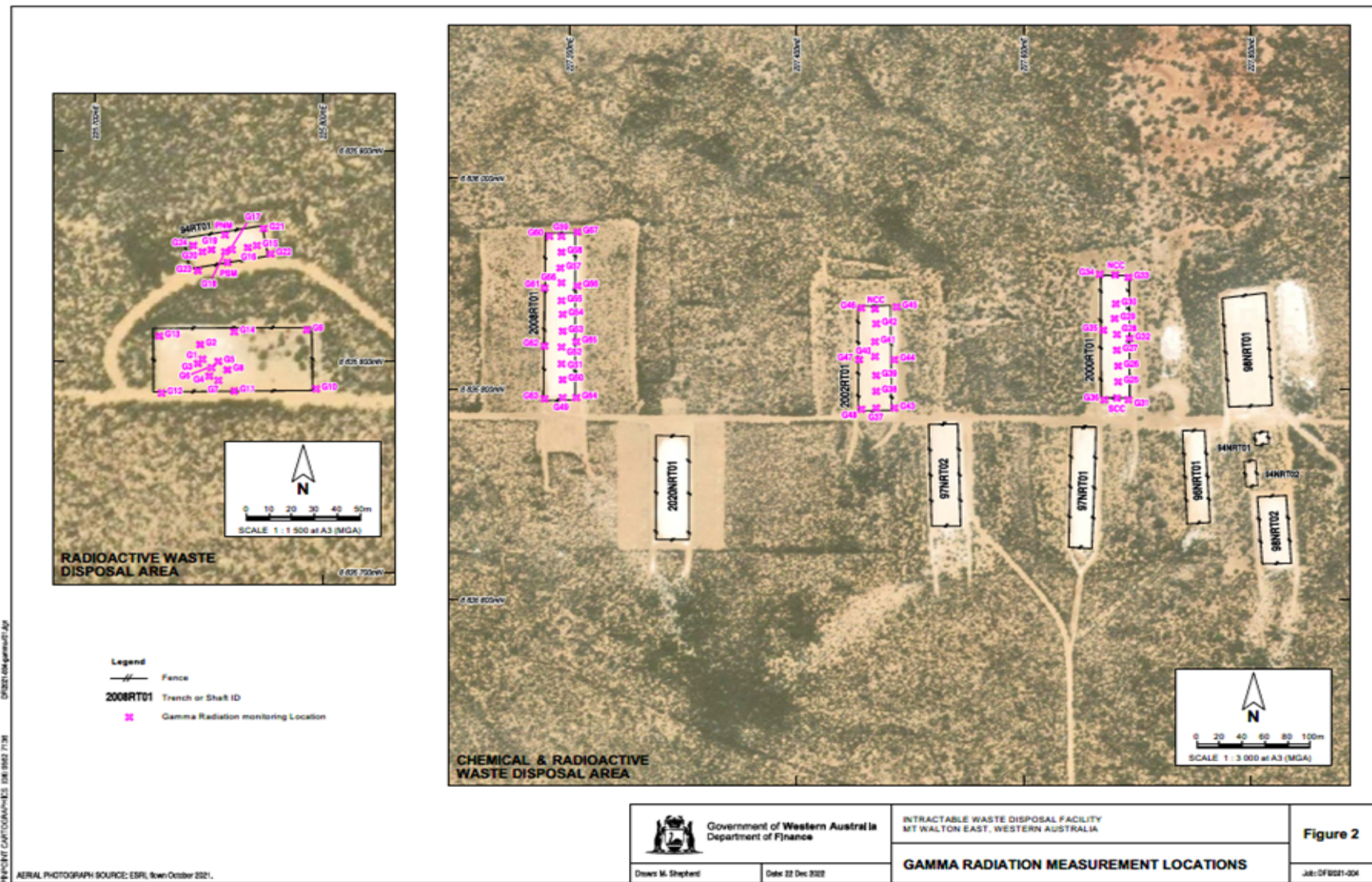



Figure 3: Picture of Radeye GX with MC71MHV mounted on a one-metre-high Tripod



APPENDICES

Appendix 1: Radeye GX MC71MHV Calibration Certificate

Thermo SCIENTIFIC	Werksbescheinigung über Kalibrierung Calibration Certificate	Page:1/1
Test piece : MC71MHV		
Serial no. Probe : 19089		
Serial no. RadEye GX : 12414		
Identification RadEye GX : 92-03		
Software version : E2.02		
Calibration Parameters		
Exposure equivalent : Hx		
Date of calibration : October 26, 2021		
The probe was mounted horizontally, sideways on to the gamma radiation beam.		
Energy compensation filter closed (if existing).		
Cable length : 36 inches		
Comment : CA-15-36		
Probe		
Calibration factor [(μGy/h)/cps] :	5,3497E-02	8,77 μGy/h
Dead time [μs] :	137	175 μGy/h
Dead time coeff. [n(s ²)] :	-5,8	877 μGy/h
Overload counter [cps] :	18000	877 μGy/h
Power indicator [cps] :	410	877 μGy/h
HV [V] :	450	
Check measurements		
Verification of the measurement accuracy Cs-137 :		
Nominal [μGy/h] :	Actual [μGy/h] :	Deviation [%]
8,77	8,91	1,6 %
43,9	43,5	-0,7 %
87,7	85,8	-2,2 %
439	423	-3,6 %
877	883	0,7 %
8770	Overrange	OK
Measuring time [s]	Tolerance limit [%]	
67	10	
13	10	
7	10	
5	10	
5	10	
10	---	
Deviation within the tolerance :		Yes
Overrange OK :		Yes
Test according to test instruction RadEye GX.		
Calibration is saved in File :		
PC1C:\Thermo\CalRadEye\Calib\MC71-MHV.cal		
Protocol date :	Signature :	
Erlangen, October 26, 2021		M. Danieli

APPENDIX I

**Extract from Department of Finance Retention and
Disposal Schedule**

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 J

June 2023 ASNO Annual Inventory Submission Acknowledgement

From: nuclear.asno@dfat.gov.au
To: [Leanne Morton](mailto:Leanne.Morton); emma.savage-jones@finance.wa.gov.au; IWDF-MountWalton@finance.wa.gov.au; Sze-Wan.Ng@finance.wa.gov.au; [Stuart Parr](mailto:Stuart.Parr); nuclear.asno@dfat.gov.au
Subject: Report on Physical Inventory Taking submitted on 3 Jun 2022 for Minister for Works c/- Department of Finance (Western Australia) - Intractable Waste Disposal Facility (IWDF), Mt Walton East by stuart.parr@auroraenvironmental.com.au [SEC=OFFICIAL:Sensit...]
Date: Friday, 3 June 2022 1:13:45 PM
Attachments: [Finalised Physical Inventory for Dept Finance \(WA\) at 03Jun2022.151307.xlsx](#)

This email acknowledges that a contact for your organisation has logged into the NUMBAT database (<https://numbat.dfat.gov.au>) and clicked the “Complete Physical Inventory Taking” button, submitting the inventory list of nuclear material for your organisation as of 30 June 2022.

You are receiving this email because you are listed as a primary contact for your organisation. The Australian Safeguards and Non-Proliferation Office (ASNO) will review your submission and contact you if it has any questions.

For reference, attached is a copy of your organisation’s inventory list as reported by your organisation today. If you have any questions, please contact nuclear.asno@dfat.gov.au.

APPENDIX K
ASNO ASO316 Report

From: [Hopkins, Eleanor](#)
To: [ASNO Nuclear](#)
Cc: [Ng, Sze-Wan](#); [Leanne Morton](#)
Subject: Permit Number PN207 - Submission of ASO316 form - 2023
Date: Thursday, 23 February 2023 2:43:19 PM
Attachments: [image001.png](#)
[DG SIGNED - Attachment 1 - ASO316 Form - Description of Buildings.PDF](#)

Good afternoon,

Please find attached the completed ASO316 Form and relevant site maps in PDF format for permit number PN207. The information provided in the ASO316 Form has not changed since the 2022 submission.

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

If you have any questions, please do not hesitate to contact me.

Kind regards,

Eleanor

Eleanor Hopkins

IWDF Project Director

Djookanup, 16 Parkland Road, Osborne Park WA 6017

Phone 6551 1806

Mobile 0417 901 545

Email eleanor.hopkins@finance.wa.gov.au

Web WA.gov.au



The Department of Finance 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.

APPENDIX L

2022 – 2023 CLC Meeting Minutes

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

Final v1

Chairperson:	Eleanor Hopkins	Date & Time:	16 February 2023 10.03 am – 11.23 am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
		Meeting No.	2022/23 Meeting 2

Attendees:		
Eleanor Hopkins	(EH)	IWDF Project Director, Department of Finance (Chairperson)
Leanne Morton	(LM)	IWDF FMC Acting Project Manager
Jan McLeod	(JMCL)	Coolgardie Community Representative
Rhonda Evans	(RE)	Coolgardie Community Representative (via Teams)
Bryan Close	(BC)	Deputy President, Shire of Yilgarn (via Teams – left the meeting at 11.15 am)
Rob Stewart	(PD)	Acting CEO, Shire of Menzies (via Teams)

Apologies		
Sze-Wan Ng	(SN)	IWDF Contract Manager, Department of Finance
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
Suzie Williams	(SW)	Coolgardie Community Representative
Mick Kinnaird	(MK)	Acting Executive Manager Regulatory Services, Shire of Yilgarn
David Williams	(DW)	Community Representative – Western Australian community outside the Shires of Coolgardie, Menzies and Yilgarn
Tracey Rathbone	(TR)	Deputy President, Shire of Coolgardie
James Trail	(JT)	CEO, Shire of Coolgardie
Nic Warren	(NW)	CEO, Shire of Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
Greg Dwyer	(GD)	Shire President, Shire of Menzies
Mal Cullen	(MC)	President, Shire of Coolgardie
Abnesh Chetty	(AC)	Environmental Officer – Licensing, Department of Water and Environmental Regulation

Observers
None

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>EH declared the meeting open at 10.03 am.</p> <p>EH 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>EH introduced herself and welcomed all committee members and advised there was no observers.</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>EH stated that the draft minutes for the previous meeting, held on 29 November 2022, were distributed on 5 December 2022, within the two-week timeframe in accordance with the CLC Terms of Reference and Operational Guidelines (CLC ToR).</p> <p>EH stated that no amendments to the November 2022 meeting minutes have been requested to date. EH asked the CLC if there were any further amendments.</p> <p>No further amendments were requested by the CLC therefore EH requested that the CLC endorse the minutes for November 2022.</p> <p>RE moved to accept the November 2022 minutes. BC seconded.</p>	
5.0	<p>Business Arising from Previous Minutes</p> <p>5.1 PCR hardcopies</p> <p>At the June 2022 meeting, hardcopies of the 2020-2021 PCR were requested by JMCL and by TR for the Shire of Coolgardie Resource Centre.</p> <p>EH reported that SN had spoken with TR in January and TR had agreed that a hardcopy would no longer be required for the Shire of Coolgardie Resource Centre as the PCR is available online at https://www.wa.gov.au/organisation/department-of-finance/intractable-waste-disposal-facility-mt-walton-east-iwdf.</p> <p>A hardcopy of the 2020-2021 PCR was provided to JMCL at the start of this meeting.</p> <p>Due to the PCR now being available online and the costs of producing hardcopies of the PCR, moving forward, requests for hardcopies may involve a cost to the requester.</p> <p>5.2 CLC visit to the IWDF 29 November</p> <p>JMCL thanked the Department of Finance (Finance) for facilitating the CLC visit and MJS for driving the bus used to transport the CLC to the IWDF on the 29 November 2022.</p> <p>JMCL commented that as a community representative on the CLC it was very beneficial to experience aspects of the IWDF first-hand and this knowledge would then assist her when speaking to the community about the IWDF.</p>	

Meeting Agenda		
Item		Action / When
	<p>JMcL found the general site induction and the rehabilitation explanation particularly useful.</p> <p>RE also commented that it was a great day and the knowledge she gained from the visit has allowed her to inform the traditional owners that the land is being respected and well managed.</p> <p>EH reported that Finance had received several communications regarding the site visit and all the feedback had been very positive.</p>	
6.0	<p>Management of the IWDF</p> <p>6.1 IWDF Safety Assessments and Safety Case</p> <p>The IWDF Safety Assessments and Safety Case continue to be progressed. The draft Operation Safety Assessment (OSA) and Post Closure Safety Assessment (PCSA) have been completed by the RSO and the documents have been reviewed by Finance.</p> <p>Copies of the draft OSA and PCSA were emailed to the CLC members on the 15 February 2023. Hardcopy of these documents were tabled at the meeting. JMcL has taken responsibility for the tabled OSA and PCSA. EH reminded the CLC that these documents are draft and should not be circulated to any other parties until the final version has been released.</p> <p>The draft OSA and PCSA will be submitted to the Radiological Council of Western Australia (RCWA) for feedback during the next week. It was requested that any questions or feedback from CLC members on the OSA and PCSA be directed to the FMC.</p> <p>The updated IWDF Safety Case, containing both the OSA and PCSA is almost complete. A copy of the draft Safety Case will be provided to the CLC as soon as it has been reviewed by Finance.</p> <p>It should also be noted that advice regarding the total activity limits for each isotope disposed at the IWDF is still pending from the RCWA. These total activity limits when provided may require some changes to the draft OSA and PCSA.</p> <p>6.2 2021 – 2022 PCR (draft)</p> <p>The draft 2021 – 2022 PCR has now been completed. LM tabled a hardcopy of the draft 2021 – 2022 PCR and informed the CLC that electronic copies can be provided to CLC members by sending an email request to SN. JMcL has taken responsibility for the hardcopy 2021 – 2022 PCR.</p> <p>LM requested that all questions or feedback regarding the 2021 – 2022 PCR be directed to LM at the FMC. LM's contact details are: leanne.morton@auroraenvironmental.com.au or 0417916219.</p> <p>6.3 Management Review Meeting</p> <p>LM reported that the 17th MRM was held on 15 December 2022. LM tabled a hardcopy of the MRM minutes (including attachment). JMcL has taken responsibility for the hard copy MRM minutes. A copy of the December 2022 MRM minutes will be sent to the CLC with the draft minutes of this meeting.</p>	<p>SN to send Dec MRM minutes with draft minutes of</p>

Meeting Agenda																												
Item		Action / When																										
	<p>EH commented that as the MRM minutes have only just been tabled, discussion regarding the content would be postponed until the June meeting to allow the CLC time to review the minutes.</p> <p>JMcL commented that this was not ideal as the next CLC meeting will be more than six months after the December MRM. JMcL asked that in future MRM minutes be sent to CLC members at least two weeks before the CLC meeting to give members enough time to review the minutes and, if required prepare questions or comments.</p> <p>6.4 Internal Compliance Audits</p> <p>6.4.1 Results of internal compliance audit for 2021 – 2022 Reporting Period</p> <p>LM reported that at the November 2022 CLC meeting only the preliminary compliance auditing for the current reporting period (July 2022 – June 2023) was reported however the completed compliance auditing for the previous reporting period was not reported to the CLC. The completed audit reports for the 2021 – 2022 reporting period can be found in the 2021 – 2022 PCR and a summary of the results is provided below.</p> <table border="1"> <thead> <tr> <th>Instrument</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Ministerial Statement 562</td> <td>One non-compliance PC 8 No of CLC meetings.</td> </tr> <tr> <td>Department of Finance - Environmental Licence (DWER)</td> <td>No non-compliances.</td> </tr> <tr> <td>Department of Finance - Radiological Council Registration (RCWA)</td> <td>No non-compliances.</td> </tr> <tr> <td>ASNO Permit Department of Finance - Department of Foreign Affairs and Trade, The Australian Safeguards and Non-Proliferation Office</td> <td>No non-compliances.</td> </tr> <tr> <td>Department of Finance, - EHSQMS</td> <td>One non-compliance MP-08 4.8.4 CLC meetings.</td> </tr> <tr> <td>IWDF (FMC) – EHSQMS</td> <td>No non-compliances.</td> </tr> <tr> <td>Department of Finance – Management Plans</td> <td>One non-compliance MP 10 No of CLC meetings.</td> </tr> </tbody> </table> <p>6.4.2 Results of internal compliance audit for 2022-2023 Reporting Period</p> <p>LM reported that internal compliance auditing for the first half of the current reporting period (June 2022 – June 2023) has been undertaken and the results are provided below.</p> <table border="1"> <thead> <tr> <th>Instrument</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Ministerial Statement 562 (audited twice annually)</td> <td>One potential non-compliance PC 8 No of CLC meetings – potential as it is still possible to comply.</td> </tr> <tr> <td>Department of Finance - Environmental Licence (DWER)</td> <td>No non-compliances to date.</td> </tr> <tr> <td>Department of Finance - Radiological Council Registration (RCWA)</td> <td>No non-compliances to date.</td> </tr> <tr> <td>ASNO Permit Department of Finance - Department of Foreign Affairs and Trade, The</td> <td>No non-compliances to date.</td> </tr> </tbody> </table>	Instrument	Status	Ministerial Statement 562	One non-compliance PC 8 No of CLC meetings.	Department of Finance - Environmental Licence (DWER)	No non-compliances.	Department of Finance - Radiological Council Registration (RCWA)	No non-compliances.	ASNO Permit Department of Finance - Department of Foreign Affairs and Trade, The Australian Safeguards and Non-Proliferation Office	No non-compliances.	Department of Finance, - EHSQMS	One non-compliance MP-08 4.8.4 CLC meetings.	IWDF (FMC) – EHSQMS	No non-compliances.	Department of Finance – Management Plans	One non-compliance MP 10 No of CLC meetings.	Instrument	Status	Ministerial Statement 562 (audited twice annually)	One potential non-compliance PC 8 No of CLC meetings – potential as it is still possible to comply.	Department of Finance - Environmental Licence (DWER)	No non-compliances to date.	Department of Finance - Radiological Council Registration (RCWA)	No non-compliances to date.	ASNO Permit Department of Finance - Department of Foreign Affairs and Trade, The	No non-compliances to date.	<p>this meeting. SN to include Dec MRM on agenda for June 2023 meeting.</p>
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	<p>6.5 Environmental Gamma Radiation Survey</p> <p>LM tabled a copy of the <i>2022 Environmental Gamma Radiation Survey for the Intractable Waste Disposal Facility (IWDF)</i>. A gamma radiation survey for the IWDF is required every five years if no disposal of radioactive waste has occurred. This survey was undertaken in October 2022 and reporting completed in December 2022.</p> <p>JMcL has taken responsibility for the tabled gamma radiation report.</p> <p>LM reported that the survey concluded that the radiological conditions for the IWDF have remained stable and are at normal background radiation levels, and therefore present no health risk to the public or the environment.</p> <p>RE requested a PDF copy of the <i>2022 Environmental Gamma Radiation Survey for the Intractable waste Disposal Facility (IWDF)</i>.</p>	SN to send survey report to RE.								
7.0	<p>CLC Terms of Reference and Operational Guidelines</p> <p>7.1 EH noted the annual review of the ToR was due and requested comment from members.</p> <p>Section 2.1.1</p> <p>RE requested that <i>Traditional Owners of the Land</i> (maximum of two) be added as a new membership category to section 2.1.1. RE stated that although available to all traditional owners, the new membership category would very likely be filled by local traditional owners.</p> <p>Section 2.1.2</p> <p>JMcL requested that section 2.1.2 be reworded for clarity and the benefit of new members. JMcL requested that the word “manages” be replaced by “the Proponent” as she felt that the management of the IWDF is performed by the FMC. There was some discussion around the types or levels of management. EH explained that Finance on behalf of the Minister for Works does in fact manage the asset that is the IWDF. This asset management includes decisions about general maintenance and minor upgrades to the asset. LM explained that the FMC, who is a contractor of the Proponent, is responsible for the operational and environmental management of the IWDF. Despite these different types of management responsibility, the management of the IWDF is very much a team effort.</p> <p>Section 2.5</p> <p>LM commented that section 2.5 requires that the CLC meet a minimum of four times per year despite the CLC agreeing, on the 14 October 2021, to reduce the number of meetings to three times per year, unless additional meetings are requested. As the CLC Operational Guidelines are owned by the CLC it is open to the CLC to acknowledge this agreement in the Operational</p>									

Meeting Agenda																	
Item		Action / When															
	<p>Guidelines. This would not affect Proponent Commitment 8 of Ministerial Statement 562 and a non-compliance will still be recorded for Proponent Commitment 8.</p> <p>JMcL commented that if the reduction of the minimum number of meetings is formally progressed with the EPA under Section 45c or 46 then she would like to see the WA waste only condition revisited. JMcL stated that given non-Western Australian waste is transported down the same access road to a site on a few kilometres to the west this condition no longer makes any sense.</p> <p>It was agreed that the potential changes to the ToR would be drafted, and a new version would be sent the CLC, with the draft minutes of this meeting, for comment and feedback.</p>	<p>SN to draft the potential changes to ToR and send to CLC with draft minutes of this meeting.</p>															
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>No new waste enquiries have been received by the FMC since the last CLC meeting.</p> <p>8.2 Waste Acceptance Applications</p> <p>No new waste acceptance applications have been received by the FMC since the last CLC meeting.</p> <p>LM reported that, since the last CLC meeting, the one application under assessment has now been assessed as suitable for disposal at the IWDF and has also received RCWA approval for disposal.</p> <p>The status of waste enquiries and applications is provided below.</p> <table border="0"> <thead> <tr> <th>Stage of progress</th> <th>Radioactive</th> <th>Chemical</th> </tr> </thead> <tbody> <tr> <td>Approved applications</td> <td>22 (partial)</td> <td>0</td> </tr> <tr> <td>Applications under assessment</td> <td>0</td> <td>0</td> </tr> <tr> <td>Applications awaiting assessment</td> <td>0</td> <td>0</td> </tr> <tr> <td>Waste enquiries in progress</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p><i>Partial – some radioactive wastes declared for disposal will require further justification and resubmission to RCWA.</i></p>	Stage of progress	Radioactive	Chemical	Approved applications	22 (partial)	0	Applications under assessment	0	0	Applications awaiting assessment	0	0	Waste enquiries in progress	0	0	
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Meeting Agenda		
Item		Action / When
9.0	<p>General Business</p> <p>9.1 Updated IWDF Handbook</p> <p>The IWDF Handbook was updated in early December 2022:</p> <ul style="list-style-type: none"> • References to the most recent monitoring events e.g., the gamma radiation survey Oct 2022. • Updated October 2022 rehabilitation monitoring photo in section 5.3. • Figure 4 has been replaced with a simpler version. • Where required, parts of the flow diagram have been replaced with parts from the latest version of the flow diagram in Section 4. <p>The new version (Version 18) was uploaded to the website on 12 December 2022.</p> <p>The 2-page brochure was updated with Finance's new branding on 12 January 2023.</p> <p>LM commented that the figures in the Handbook using aerial photography as a base are using photography flown around 2012. In late December, the FMC became aware of more recent aerial photography covering the IWDF. The relevant figures in the Handbook are currently being updated to use the more recent aerial photography. This is important as the figures will now show the actual 2020NRT01 disposal cell and not a manually drawn cell. The updated aerial photography also more clearly demonstrates the status of the rehabilitation around the disturbed areas.</p> <p>It was agreed that the CLC would be notified by email as soon as the Handbook has been updated and is available on the IWDF web page.</p> <p>9.2 Membership Issues of the CLC</p> <p>EH reported to the CLC that SW would be resigning from the CLC as a Coolgardie community representative. SW is hoping to be nominated as a Kalgoorlie/Boulder Council representative. SW has agreed to send a nomination form before the next CLC meeting.</p> <p>EH advised JMcl's that her membership would expire in October 2023 and asked that JMcl advise her intentions by the June 2023 CLC meeting.</p> <p>9.3 Scheduling of meetings for the next reporting period.</p> <p>It was recognised that there are no CLC meetings scheduled for the second half of this year. EH asked the CLC if they were still comfortable with holding meetings in October, February, and June. The CLC agreed that this was still acceptable. EH suggested that Finance schedule potential meeting dates for October 2023, February 2024 and June 2024 and email the dates to the CLC prior to the next meeting in June 2023.</p> <p>9.4 RCWA registration for the IWDF</p> <p>JMcl noted that the RCWA Registration for the IWDF expired on the 8 February 2023 and requested an update on the status of this registration.</p> <p>LM reported that an application for renewal of registration of premises for the IWDF had been submitted by Finance to the RCWA. At this time RCWA have not yet issued a new registration for the IWDF.</p> <p>LM also reported that, after discussion with the RCWA, a transitional period will be allowed under the new RCWA registration for the IWDF to enable gradual implementation of the</p>	<p>SN to notify the CLC members when the updated Handbook is available.</p> <p>SN to schedule potential meeting dates and email to CLC prior to the next meeting.</p>

Meeting Agenda		
Item		Action / When
	<p>requirements of the ARPANSA (2018) <i>Code for Disposal Facilities for Solid Radioactive Waste</i>, October 2018, (Radiation Protection Series C-3), while still meeting the requirements of the NHMRC (1993) <i>Code of practice for the near-surface disposal of radioactive waste in Australia (1992)</i>, (Radiation Health Series RHS 35).</p> <p>9.5 Solar lighting at the entrance to the IWDF</p> <p>JMcL commented that, in her view, the solar lighting at the entrance gate of the IWDF was an example of unnecessary government spending. JMcL cited another example of unnecessary spending where Finance had installed signs along the access road providing a Finance phone number to call except the locations of the signs had no mobile phone reception.</p> <p>JMcL also asked why the CLC were not informed prior to the installation of the lighting.</p> <p>EH responded that Finance has broad work, health and safety obligations in relation to the access road and IWDF and does not intend to consult with the CLC in relation to maintenance and minor upgrades related to these assets.</p> <p>LM commented that she has had a phone call from a Coolgardie resident, who regularly goes to Sandy Ridge, asking why the lights have been installed and was the lighting an invitation to visit the IWDF.</p> <p>9.6 Rio Tinto lost and found Caesium 137 source</p> <p>JMcL tabled a newspaper cutting regarding the Rio Tinto lost and found Cs-137 source and commented that although in this case a single source, it demonstrated that there is still a need for a state-owned facility such as the IWDF to manage the disposal of intractable waste resulting from serious incidents.</p>	
10.0	<p>Close / Scheduling of Next Meeting</p> <p>10.1 The next meeting is scheduled for 22 June 2023.</p> <p>EH closed the meeting at 11.23 am.</p>	

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

Final Rev 1

Chairperson:	Eleanor Hopkins	Date & Time:	29 November 2022 2.04 pm – 2.16 pm
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Intractable Waste Disposal Facility, Mt Walton East
		Meeting No.	2022/23 Meeting 1

Attendees:		
Eleanor Hopkins	(EH)	IWDF Project Director, Department of Finance (Chairperson)
Sze-Wan Ng	(SN)	IWDF Contract Manager, Department of Finance
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
Jan McLeod	(JMCL)	Coolgardie Community Representative
Rhonda Evans	(RE)	Coolgardie Community Representative
David Williams	(DW)	Community Representative – Western Australian community outside the Shires of Coolgardie, Menzies and Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
Bryan Close	(BC)	Deputy President, Shire of Yilgarn
Mick Kinnaird	(MK)	Acting Executive Manager Regulatory Services, Shire of Yilgarn
Greg Dwyer	(GD)	Shire President, Shire of Menzies
Pascoe Durtanovich	(PD)	Acting CEO, Shire of Menzies

Apologies		
Leanne Morton	(LM)	IWDF FMC Project Manager
Suzie Williams	(SW)	Coolgardie Community Representative
Mal Cullen	(MC)	President, Shire of Coolgardie (see comment by TR at Section 2.0)
Tracey Rathbone	(TR)	Deputy President, Shire of Coolgardie
James Trail	(JT)	CEO, Shire of Coolgardie
Nic Warren	(NW)	CEO, Shire of Yilgarn
Abnesh Chetty	(AC)	Environmental Officer – Licensing, Department of Water and Environmental Regulation

Observers
None

Meeting Agenda		
Item		Action / When
1	IWDF Site Tour	
2	<p>Open the Meeting and Welcome</p> <p>EH declared the meeting open at 2.04 pm.</p> <p>EH 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>EH advised the IWDF site visit constituted the bulk of the meeting and there was limited time available to undertake a formal meeting.</p>	
3	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p> <p>Lynn Webb advised SN of his resignation from the CLC on 28 September 2022.</p>	
4	<p>Previous Minutes</p> <p>EH stated that the draft minutes of the previous meeting, held on 30 June 2022, were distributed on 8 July 2022, within the two-week timeframe in accordance with the CLC Terms of Reference and Operational Guidelines (CLC ToR).</p> <p>No amendments to the minutes were received via email or phone, and no amendments were requested by the CLC during the meeting.</p> <p>EH requested that the CLC endorse the 30 June 2022 minutes.</p> <p>BC moved to accept the 30 June 2022 minutes. DW seconded.</p>	SN to distribute final 30 June 2022 minutes to CLC.
5	<p>Management of the IWDF</p> <p>6.1 October monitoring visit</p> <p>MS reported that no groundwater was detected during the October monitoring visit. Slight moisture was detected in one of the bores due to condensation, however, this was not a concern.</p> <p>Rehabilitation of vegetation around the disposal cells has continued to progress and no issues were identified as part of the capping monitoring.</p> <p>The 5-yearly gamma radiation monitoring was also undertaken. The report is currently being finalised and will be signed off by the Radiation Safety Officer (RSO), Stuart Parr.</p> <p>6.2 IWDF Safety Assessments and Safety Case</p> <p>MS advised that draft documents had been provided to Finance, however, the documents cannot be finalised until advice is received from the Radiological Council of Western Australia (RCWA) regarding the post-closure activity limit.</p> <p>The IWDF RSO will undertake the calculations required to complete the documents following receipt of this advice.</p> <p>JMcL stated that at the June CLC meeting, LM had advised that the draft documents were anticipated to be available to the CLC for review at this meeting.</p> <p>MS advised that the current drafts were not yet available for CLC review as the calculations had not been completed.</p>	

	<p>JMcL asked when the draft documents would be made available to the CLC for review. MS advised that the documents can be provided to the CLC at the next meeting provided that they have been completed.</p> <p>6.3 2020-2021 PCR</p> <p>MS advised that the 2020-2021 Performance and Compliance Report (PCR) had been completed and submitted to the Department of Water and Environmental Regulation (DWER) and RCWA. The 2020-21 PCR is also available on the IWDF webpage.</p> <p>JMcL requested a hardcopy of the completed 2020-21 PCR and the 2021-22 PCR when it is available. JMcL stated that she has reviewed the PCR every year and apologised to the Committee as she felt that she had not fulfilled her role by not reviewing the 2020-21 PCR.</p> <p>JMcL expressed that she was grateful for the opportunity to visit the IWDF site.</p> <p>6.4 2021-2022 PCR (draft)</p> <p>MS advised that the 2021-2022 PCR is still in progress as other priorities have been on hand, including updates to the IWDF waste database and development of the IWDF Safety Assessments and Safety Case.</p> <p>6.5 EHSQMS Audit</p> <p>MS reported that an audit against the Environmental Health and Safety and Quality Management System (EHSQMS) was completed and no non-compliances were found.</p>	<p>Finance to provide a hardcopy of the 2020-21 PCR to JMcL at the next CLC meeting.</p>
6	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>Three waste enquiries have been received since the last meeting:</p> <ol style="list-style-type: none"> 1) Consultant enquiring about prices on behalf of their client. MS provided a response but did not receive further correspondence from the consultant. 2) Enquiry for approximately 600 drums of radioactive waste. A waste application has been received and assessed by the IWDF RSO. 3) Enquiry for approximately 1500 drums of radioactive waste. Further details are yet to be received. <p>DW asked if the 600 drums of waste were Western Australian waste. MS responded that it was and had received a permit for disposal at the IWDF from RCWA.</p> <p>8.2 Waste Acceptance Applications</p> <p>One new waste acceptance application has been received by the FMC since the last meeting, for the disposal of approximately 600 drums of radioactive waste.</p>	
7	<p>Next Meeting</p> <p>The next meeting is scheduled for 16 February 2023.</p> <p>EH closed the meeting at 2.16 pm.</p>	

APPENDIX M

October 2022 Rehabilitation Monitoring Record

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

REHABILITATION MONITORING RECORD IWDF-FORM-38A

Project No.: DF12022-009_ANMO			Storage Location of Photos: Aurora Environmental							Monitored By: MJS			
Site Name: Intractable Waste Disposal Facility, Mt Walton East			Client: Department of Finance							Date: 19/10/2022			
Trench/ Area	Location		Date	Time	Vegetation Density			Vegetation Variety		Description and Other Comments (e.g. soil status)			
	Loc. No	Photo No.			% Cover	Max height	Ave'ge height	Y/N	Number of plant types	Soil Status	Dead veg?	Tyned?	Other Comments
2020NRT01	01	-	19/10/2022	1154	15	0.9	0.4	Y	10	Gravelly Sand	Y	Y	Growing well
	02	-	19/10/2022	1159	7	0.8	0.3	Y	9	Gravelly Sand	Y	Y	Lagging behind Location 01
	03	-	19/10/2022	1207	2	0.4	0.1	Y	4	Gravelly Sand	Y	Y	Growth sparse perhaps due to presence of clay
2008RT01	01	-	19/10/2022	1215	70	5.0	1.3	Y	8	Gravelly Sand	Y	Y	
	02	-	19/10/2022	1219	60	2.0	1.0	Y	7	Gravelly Sand	Y	Y	
	03	-	19/10/2022	1223	75	3.5	1.3	Y	9	Gravelly Sand	Y	Y	
2002RT01	01	-	19/10/2022	1249	70	2.5	1.3	Y	7	Gravelly Sand	Y	Y	
	02	-	19/10/2022	1256	40	2.0	1.0	Y	5	Gravelly Sand	Y	Y	
	03	-	19/10/2022	1305	65	3.0	1.5	Y	6	Gravelly Sand	Y	Y	
2000RT01	01	-	19/10/2022	1229	70	4.5	2.0	Y	9	Gravelly Sand	Y	Y	
	02	-	19/10/2022	1235	35	3.0	0.8	Y	7	Gravel	Y	Y	
	03	-	19/10/2022	1243	60	5.0	1.5	Y	8	Gravel	Y	Y	
95NRT02	01									Gravelly Sand			Rehabilitation of cells pre 2000 have been deemed complete and as from 2021 will no longer be monitored
	02									Gravelly Sand			
95NRT01	01									Gravelly Sand			
	02									Gravelly Sand			
	03									Gravelly Sand & Clay			
97NRT02	01									Sandy			
	02									Sandy			
	03									Stoney Sand & Gravel			
97NRT01	01									Sandy Gravel			
	02									Silty Gravel			
	03									Sandy Gravel			
98NRT01	01									Gravel & Sand			
	02									Sand, Clay & Gravel			
	03									Gravel & Sand			
94NRT02	01								Sand & Gravel				
94NRT01	01									Sand & Gravel			
	02									Sand & Gravel			
94RT01	01									Sandy			
	02									Sandy			
	03									Sandy			
02RS01+94RS01	01									Sand & Gravel			
	02									Sandy			
	03									Sandy			

IWDF MT. WALTON EAST

**REHABILITATION
PHOTOS**

OCTOBER 2022

DFI/2022/009-Annual Monitoring



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

APPENDIX N

October 2022 Capping Monitoring Record

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

CAPPING MONITORING RECORD IWDF-FORM-38b

Project No.: DFI2022-009 ANMO				Storage Location of Photos: Aurora Environmental						Monitored By: MJS	
Site Name: Intractable Waste Disposal Facility, Mt Walton East								Client: Department of Finance			
Monitoring Location: IWDF Disposal Cells								Date: 19/10/2022			
Trench No.	Location/ Photo No.	Date	Time	Erosion channels?			Subsidence?			Description and Other Comments	
				Y/N	Number	Depth*	Y/N	Number	Depth*	View	Details
2020NRT01	Loc. 1	19-Oct	10:00	Y	4	2-5cm	N	-	-	Compound	Still looks new
	Loc. 2	19-Oct	10:04	Y	Numerous	1-5cm	N	-	-	Dome	One channel 10-20cm deep in fine clay
2008RT01	Loc. 1	19-Oct	10:13	Y	Numerous	1-5cm	N	-	-	Compound	Not deeply scoured
	Loc. 2	19-Oct	10:09	Y	2	1-3cm	N	-	-	Dome	Mirror short channels
2002RT01	Loc. 1	19-Oct	9:25	Y	2	1cm	N	-	-	Compound	Very minor channels
	Loc. 2	19-Oct	9:28	N	-	-	N	-	-	Dome	Most fines gone
2000RT01	Loc. 1	19-Oct	9:47	Y	Numerous	2-10cm	N	-	-	Compound	
	Loc. 2	19-Oct	9:51	Y	2	2-15cm	N	-	-	Dome	Main channel scoured again
98NRT02	Loc. 1	19-Oct	8:55	Y	1	1-2cm	N	-	-	Compound	Southern end - minor
	Loc. 2	19-Oct	8:59	N	-	-	N	-	-	Dome	
98NRT01	Loc. 1	19-Oct	9:06	Y	Numerous	1-15cm	N	-	-	Compound	One channel on NW end 15cm deep
	Loc. 2	19-Oct	9:10	Y	4	1-10cm	N	-	-	Dome	One slightly deeper channel
97NRT02	Loc. 1	19-Oct	9:36	Y	A few	1-5cm	N	-	-	Compound	Minor channels, fines mostly gone
	Loc. 2	19-Oct	9:33	N	-	-	N	-	-	Dome	
97NRT01	Loc. 1	19-Oct	9:39	Y	A few	1cm	N	-	-	Compound	
	Loc. 2	19-Oct	9:43	Y	2	2-5cm	N	-	-	Dome	
96NRT01	Loc. 1	19-Oct	9:17	N	-	-	N	-	-	Compound	
	Loc. 2	19-Oct	9:21	N	-	-	N	-	-	Dome	
94NRT02	Loc. 1	19-Oct	8:50	N	-	-	N	-	-	Dome	
94NRT01	Loc. 1	19-Oct	8:45	N	-	-	N	-	-	Compound	
94RT01	Loc. 1	19-Oct	8:35	N	-	-	N	-	-	Compound	
92RS01+94RS01	Loc. 1	19-Oct	8:30	N	-	-	N	-	-	Dome	Surface fines mostly removed

**IWDF MT. WALTON EAST
TRENCH CAPPING PHOTOS
OCTOBER 2022**



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 O

2022 – 2023 IWDF Management 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 (replacement to governance structure figure), minor change to Policy to ISO standard naming	LDM	MT	MT
16	10/09/21	Revised Figure 3: IWDF Governance Structure included, 92RS02 renamed 94RS01, title of Figure 3 in TOC updated,	LDM		
17	16/12/21	minor formatting changes, update to S4 to rename Chemical Disposal Area to Chemical and Radioactive Disposal area for some disposal cell summaries. Policy review.	LDM	MT	MT approved 16/12/21
18	11/05/22	Section updated to include change of proponent to Minister for Works C/- Department of Finance	LDM	MT	MT
19	15/11/22 20/12/22	Section 3.1 updated with renewed DWER Licence conditions; Section 5.5 with updated governance structure. Updated to include Policy review date.	LDM	MT	MT

MT – Management Team

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Government of Western Australia
Department of Finance

**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: Eleanor Hopkins
IWDF Project Director,

DocuSigned by:
Eleanor Hopkins

Date: 20 December 2022 | 16:20:34 AWST

3263C0181A76436...

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 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 with 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, after 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- January 2022)

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 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.

Minister for Works (January 2022 – current)

A request to change the nominated proponent from the Department of Finance to the Minister of Works C/- Department of Finance was submitted to the Department of Water and Environmental Regulation on 13 October 2021.

The request was approved by the Minister for the Environment 21 January 2022.

The Minister for Works is the relevant body corporate with the statutory authority, as an agent of the Crown in right of the State, to carry out the functions relevant to the IWDF.

The Department of Finance is the Government agency responsible for assisting the Minister for Works in the administration of the Public Works Act 1902 (WA).

The Minister for Works 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 L8190/2007/2 includes twelve conditions which are as follows:

Infrastructure and equipment

- The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

Table 1: Infrastructure and equipment requirements

Site infrastructure and equipment	Operational requirement	Infrastructure location
Groundwater monitoring bores	Maintain in operational condition.	Bores GM1-GM9 as depicted in schedule 1 Bore location Map and any future bores
Surface water management system	Ensure excavated V drains are maintained around cells, to aid surface drainage away from the water shedding clay dome.	N/A
Security fencing	Ensure fencing for the demarcation of cells is maintained free of holes, breaks and other defects.	N/A

Waste acceptance and disposal

- The Licence Holder must only accept onto the premises waste of a waste type and waste description in accordance with the requirements of Ministerial Statement (MS) 562.
- The Licence Holder must immediately recover or remove and dispose of spills of intractable waste outside of the disposal cells.
- The Licence Holder must ensure that Emergency Response Equipment is located on the premises for the duration of a waste disposal operation.

Stormwater management

- The Licence Holder must ensure that bunding is constructed to ensure that stormwater is diverted from areas of the Premises where waste is handled or stored.

Monitoring

- The Licence Holder must record the total amount of waste accepted onto the premises or removed from the premises, for each waste type listed in Table 2, with the corresponding parameters listed in Table 2, and for each corresponding time period set out in Table 2.

Table 2: Waste accepted onto or removed from the premises

Waste Type ¹	Parameter ¹	Time Period ¹
Intractable Wastes	(a) time and date of delivery; (b) waste type; (c) total quantity of the waste package (in kilograms, tonnes, litres or cubic metres); (d) the name of the waste generator; (e) the origin and source location of waste; (f) the physical, chemical and/or radiological characteristics of the waste; (g) the name and contact details of the company transporting the waste to the Premises; and (h) the name of the driver and registration number of the delivery vehicle.	Each load arriving at the Premises

Records and reporting

7. The licensee shall notify the CEO in writing at least 1-month prior¹ to the delivery of waste to the Intractable Waste Disposal Facility Mt Walton East. The following information shall be included in the notification (where known):

- (a) waste type(s) and quantities to be disposed;
- (b) disposal dates; and
- (c) status of approval under MS 562 and the Radiological Safety Act 1975.

Note 1: In the case of an emergency disposal event, where notice of disposal is not able to be provided to the CEO within the timeframe outlined in condition 7, the Licence Holder shall provide notification to the CEO as soon as possible (and no later than the end of the next working day) after becoming aware of the emergency disposal event.

8. The Licence Holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:

- (a) any maintenance of infrastructure that is performed in the course of complying with condition 1 of this licence;
- (b) monitoring undertaken in accordance with condition 6 of this licence; and
- (c) complaints received under condition 10 of this licence.

9. The books specified under condition 8 must:

- (a) be legible;
- (b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;
- (c) be retained by the Licence Holder for the duration of the licence; and
- (d) be available to be produced to an Inspector or the CEO as required.

10. The licence holder must record the following information in relation to complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the Department or another party) about any alleged emissions

from the premises:

- (a) the name and contact details of the complainant, (if provided);
- (b) the time and date of the complaint;
- (c) the complete details of the complaint and any other concerns or other issues raised; and
- (d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.

11. The licence holder must:

- (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and
- (b) prepare and submit to the CEO by no later than 90 days after the end of that annual period an Annual Audit Compliance Report in the approved form.

12. The Licence Holder must submit to the CEO by no later than 90 days after the end of each annual period, an Annual Environment Report for that annual period for the conditions listed in Table 3, and which provides the information in accordance with the corresponding requirement set out in Table 3.

Table 3: Annual Environment Report

Condition	Requirement
-	A summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the previous annual period and any action taken.
NA	Any Performance and Compliance Reports relating to the disposal of waste which were prepared during the previous annual period
Table 1	An updated map showing monitoring bore locations and designations where changes to bore infrastructure has occurred during the previous annual period.
6	Monitoring reports
10	A summary of complaints received during the previous annual period

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 Emma Savage-Jones, Director Building Management, Department of Finance as the registrant 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.

94RS01 - 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 and Radioactive 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 and Radioactive 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. The waste was disposed of in the Chemical and Radioactive Waste Disposal Area.

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 x 205 litre drums of arsenic sludge from vetrocoke processes from Wesfarmers CSBP, 20 x 205 litre steel drums of vanadium powder and six x 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 x 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) made up 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.

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.

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 and Radioactive 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

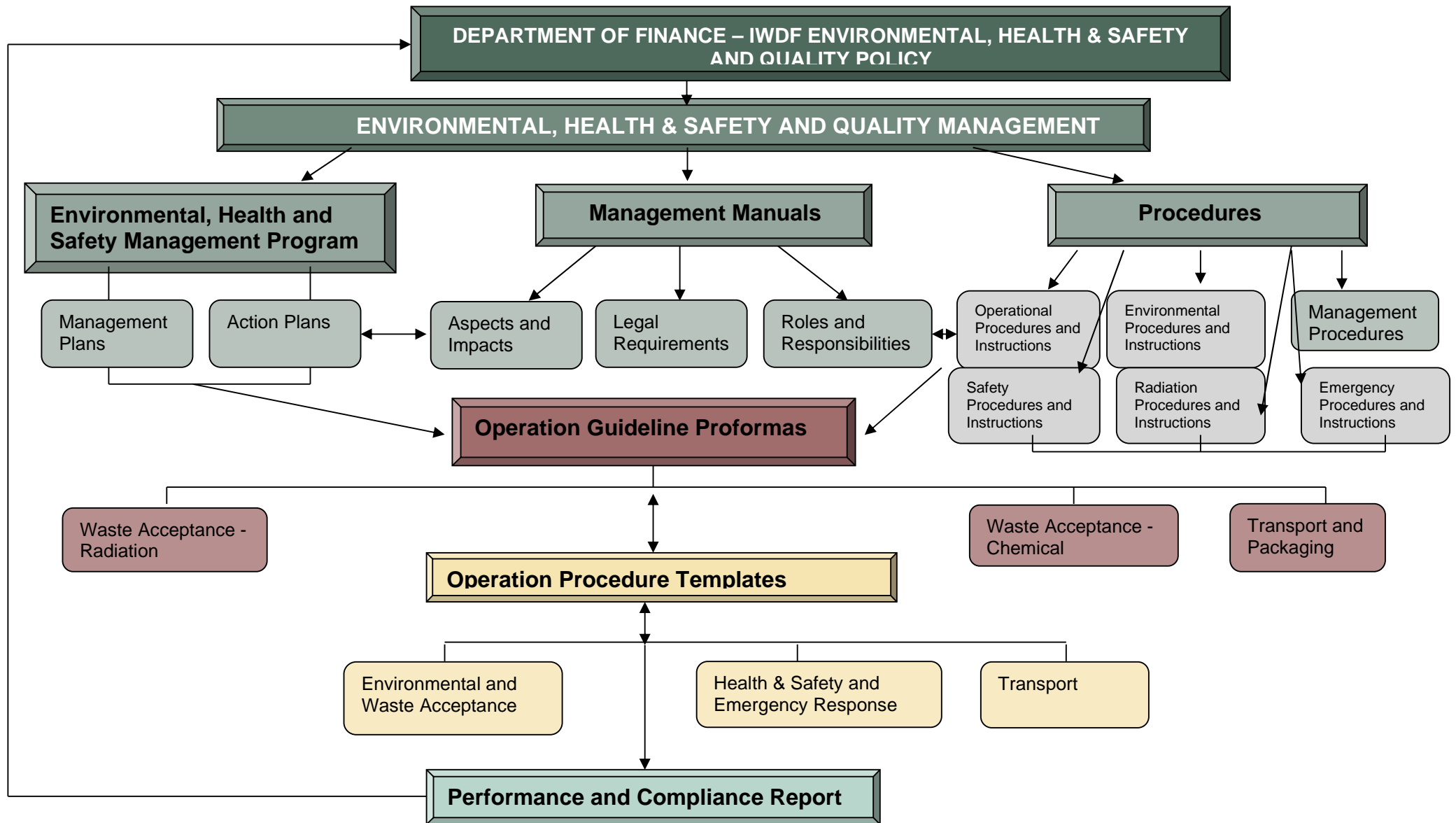
The IWDF Environmental, Health & Safety and Quality Management System (EHSQMS) is designed to identify areas of actual or potential environmental risk resulting from activities at the IWDF and formulate procedures and objectives which minimise or eliminate these risks.

When correctly implemented the EHSQMS 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 EHSQMS 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.

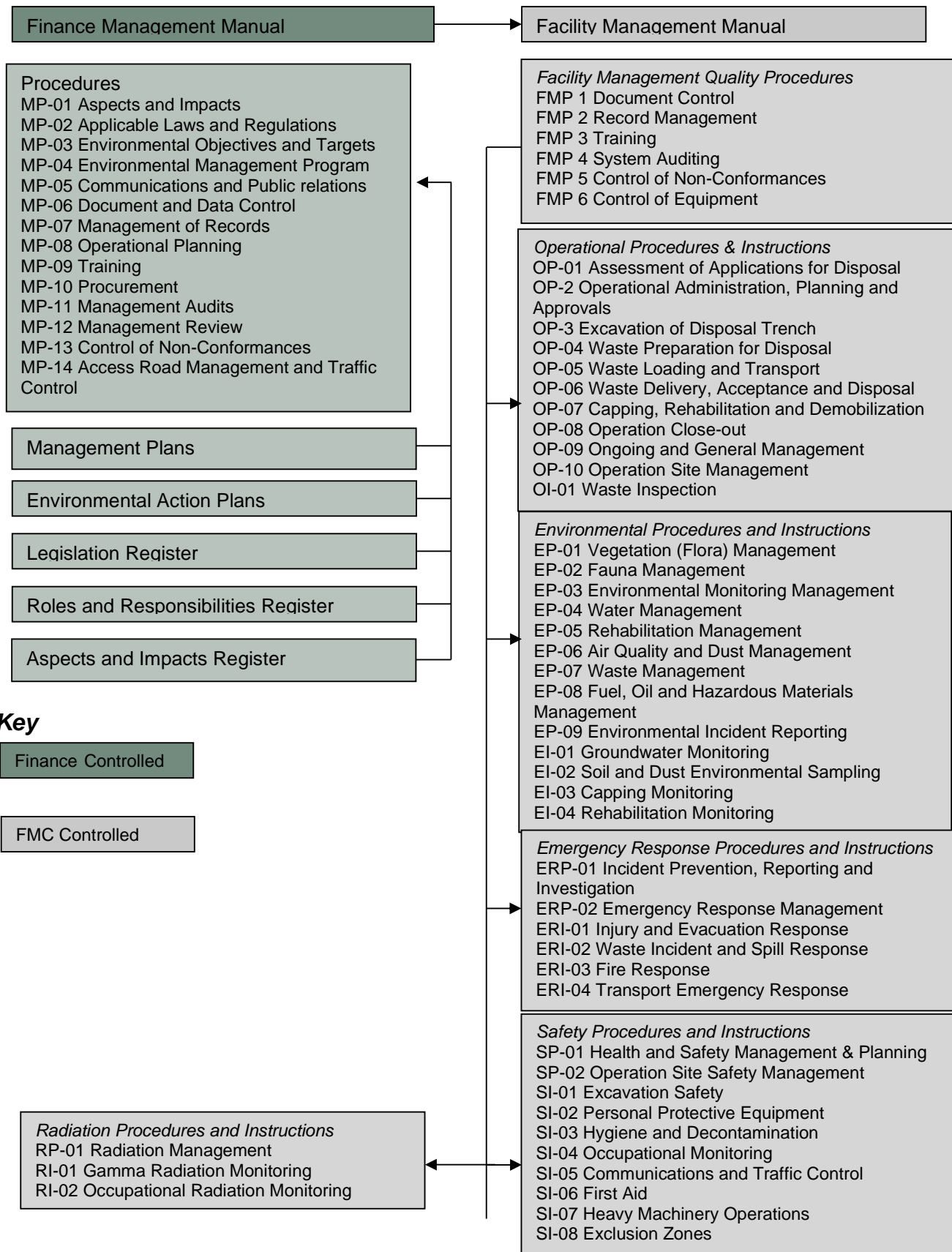
c) *Procedures*: Each procedure defines the purpose, scope and methodology of a set of systematic and related tasks and details the "who, what, where, when, how and why" of those tasks to allow any employee to undertake the tasks in the manner which Finance requires.

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



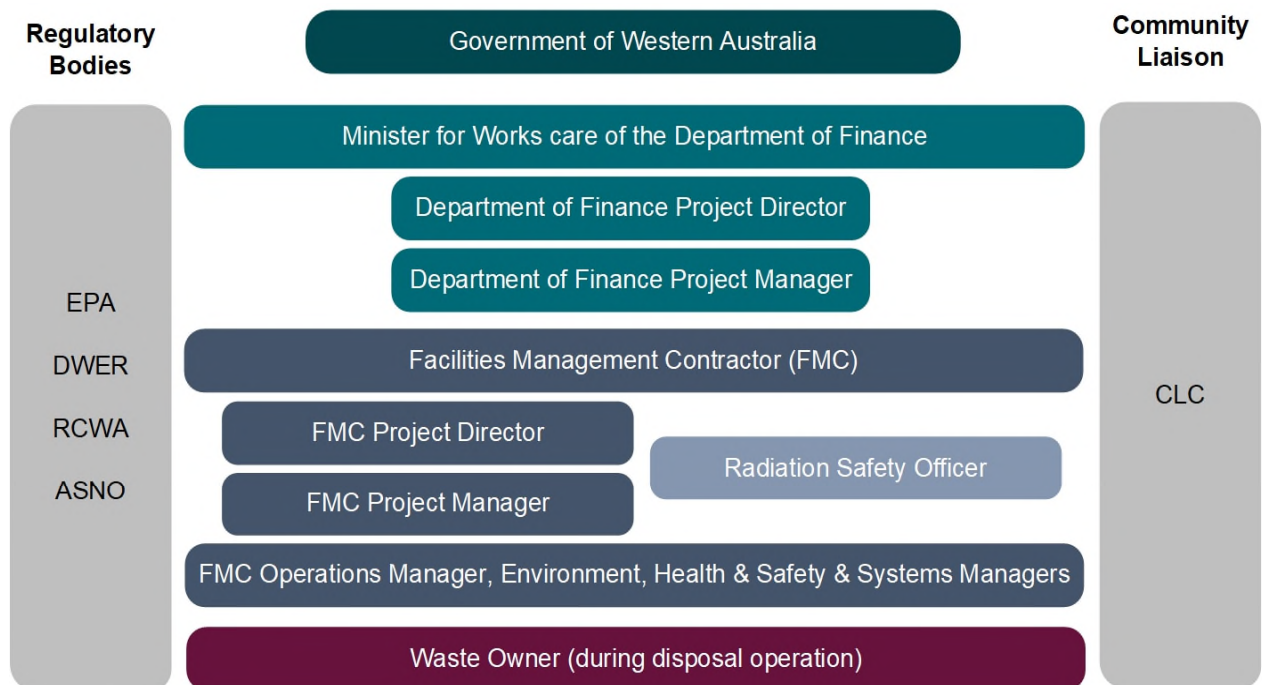
5.5 Performance and Compliance Report

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



Acronyms

- EPA: Environmental Protection Agency
- DWER: Department of Water and Environmental Regulation
- RCWA: Radiological Council of Western Australia
- ASNO: Australian Safeguards and Non-proliferation Office
- CLC: Community Liaison Committee

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
15	02/11/21	Minor formatting changes	LM	MJS	LM
16	03/12/22	Update to figures 1a and b and 3	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	Environmental, health & safety & quality management system	Surveyors	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 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 Alternative	TBA Alternative	Leanne Morton Alternative	Pinpoint Drafting Colin Reeves McMullan Nolan Surveyors	TBA	Greg Milner Alternative	Stuart Parr
Greg Milner Leanne Morton	TBA	Mark Shepherd	Analytical Reference Laboratories PGV Environmental Paul van der Moezel	Safety Officer/ Nurse TBA	Leanne Morton Mark Shepherd	
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.

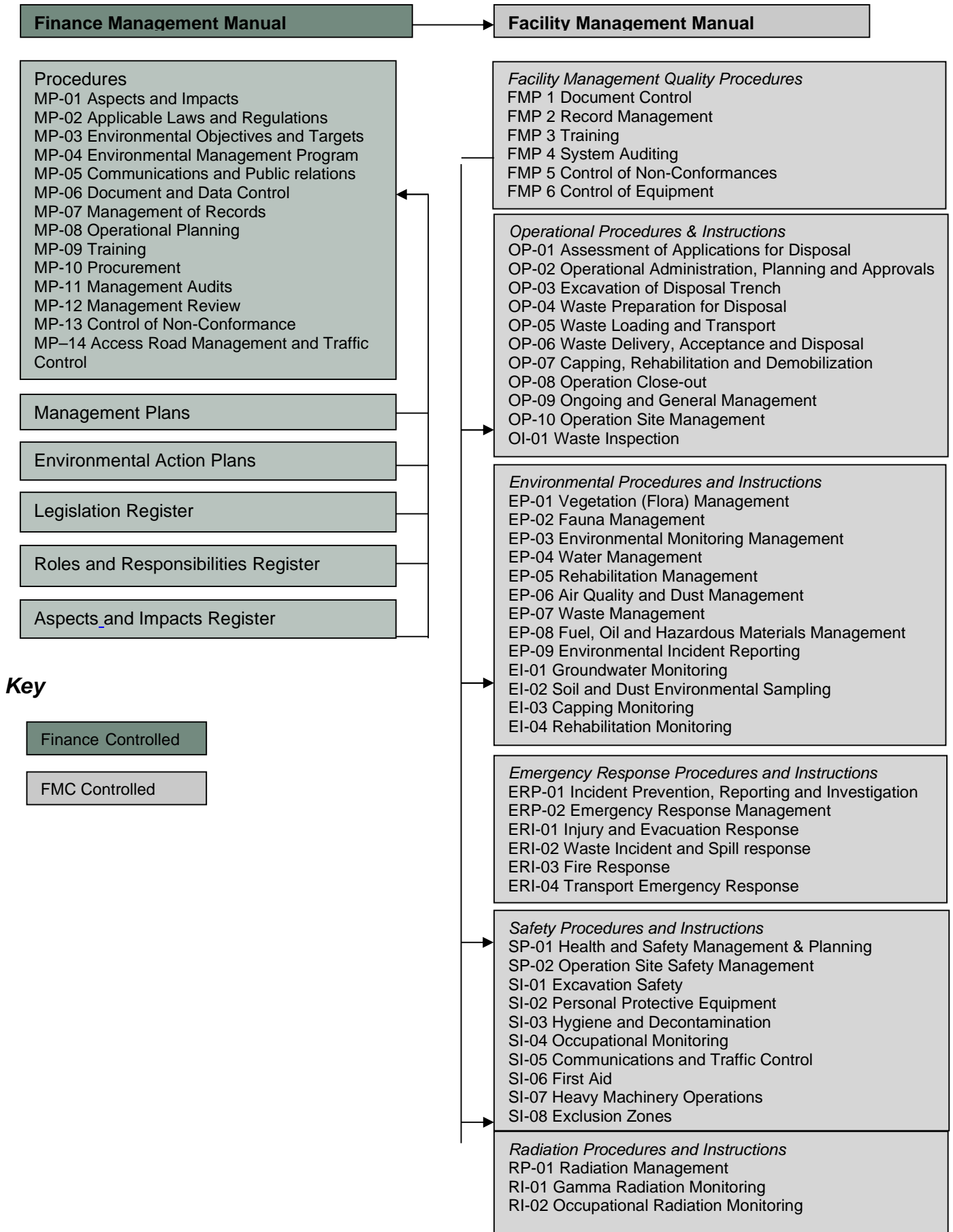
Each **Instruction** provides more specific actions regarding the way in which a particular task should be undertaken.

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

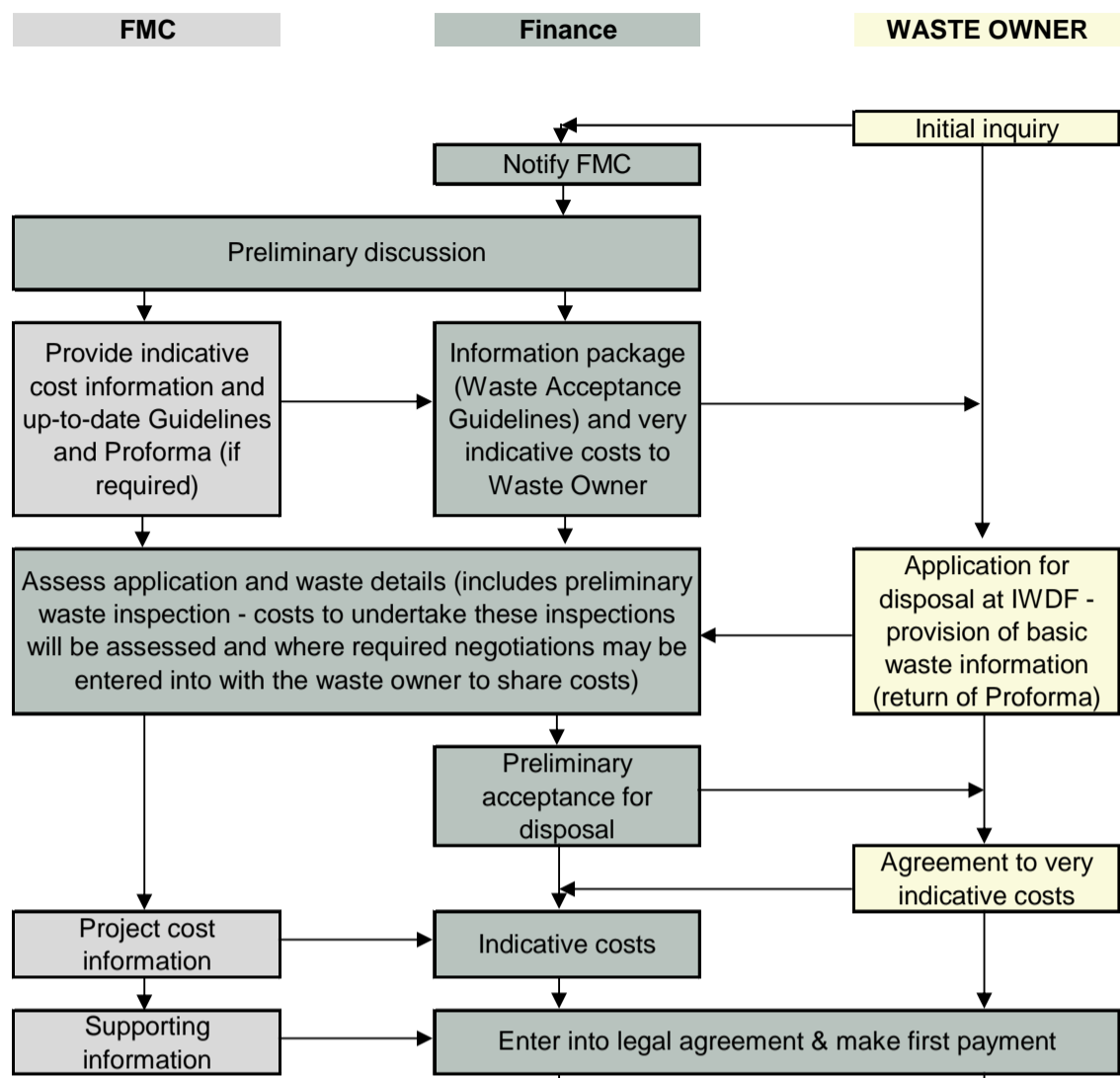
In addition to IWDF procedures, Operation Procedures must be referred to during disposal operations (e.g., Operation Environmental Procedures). These documents are generated on an operation-by-operation basis following applicable guidelines (see the Finance System Manual) and include reference to waste-specific 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

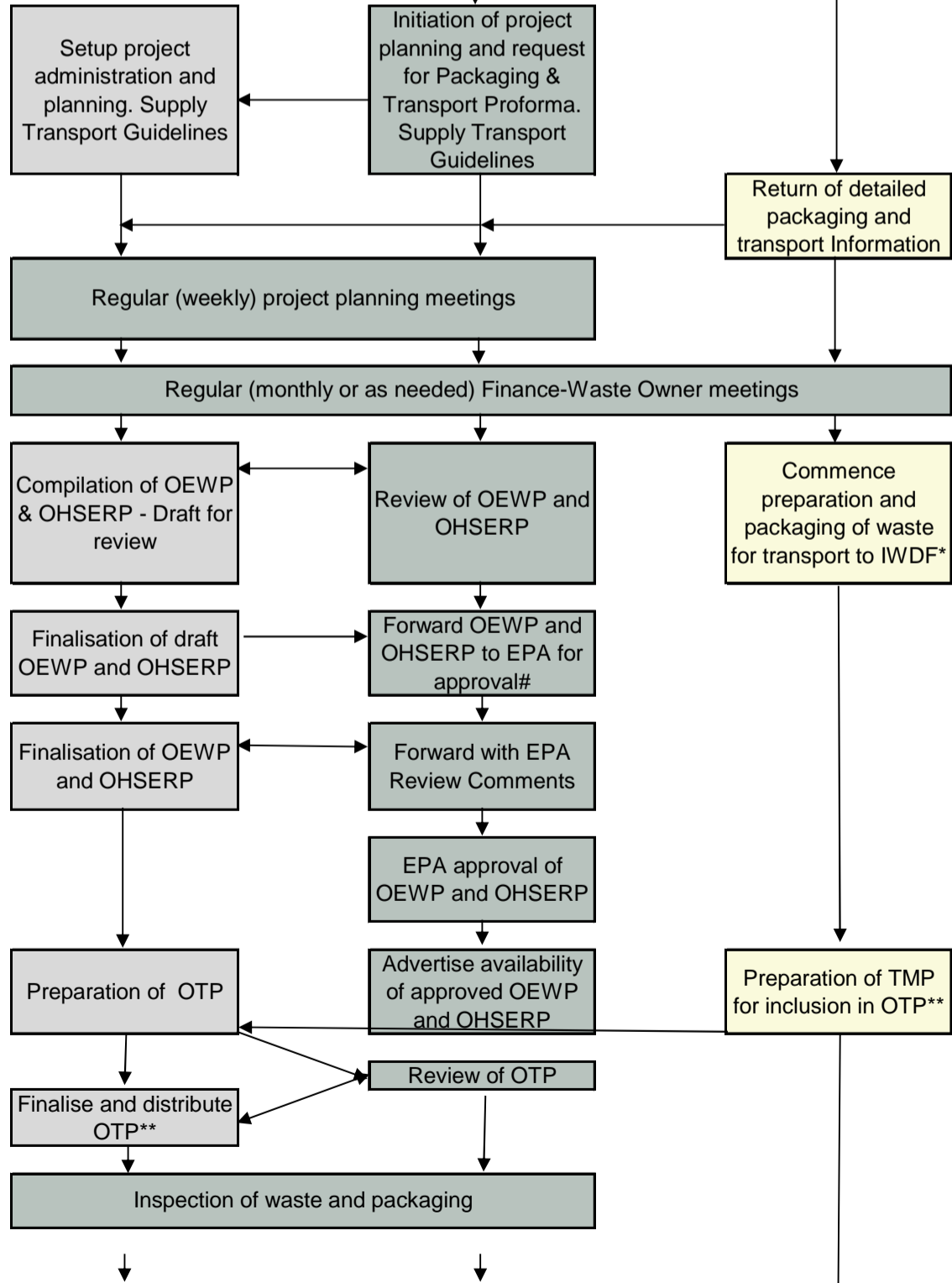
Typical Sequence of Activities

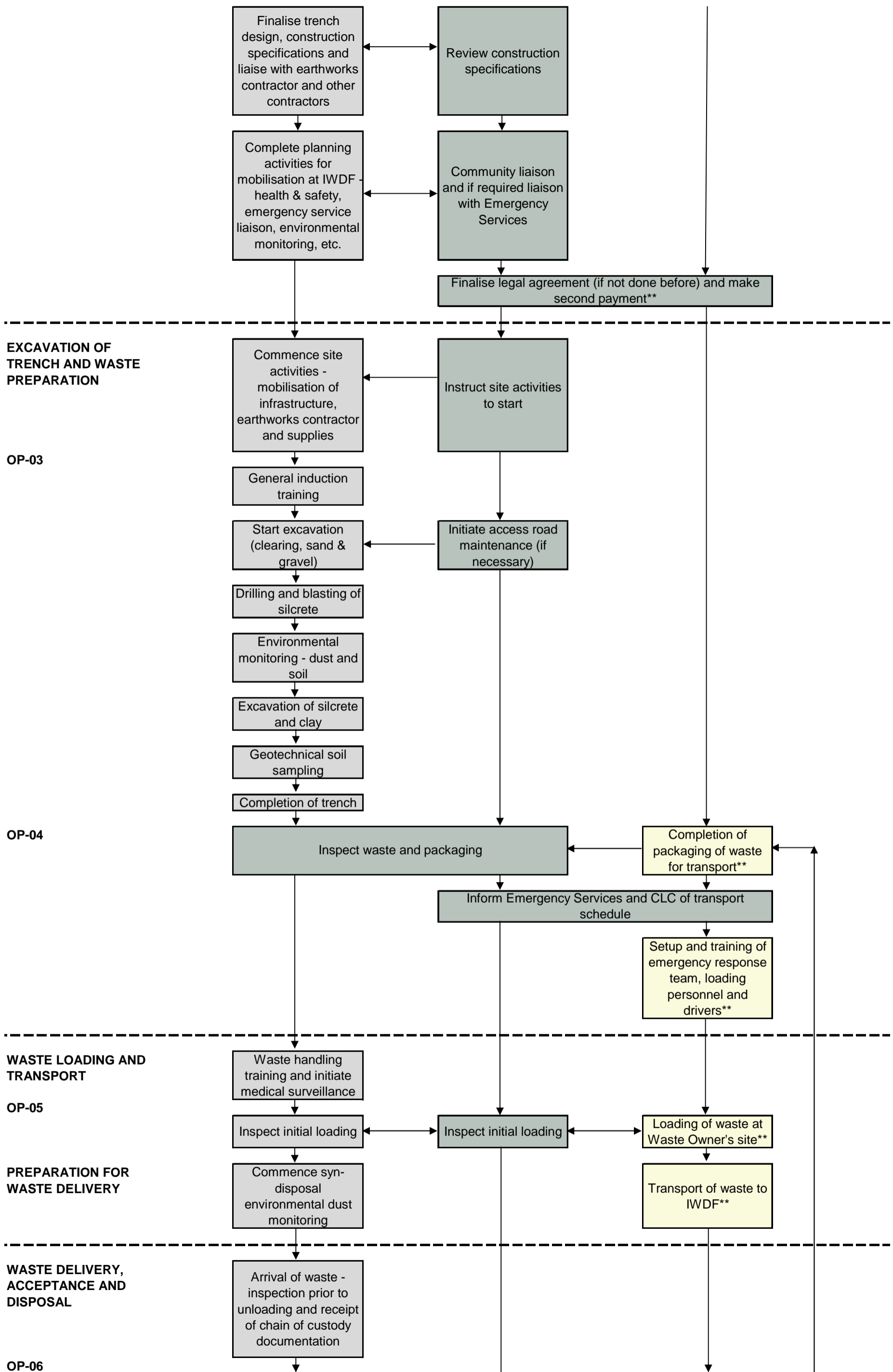
INQUIRY AND INITIATION
OP-01

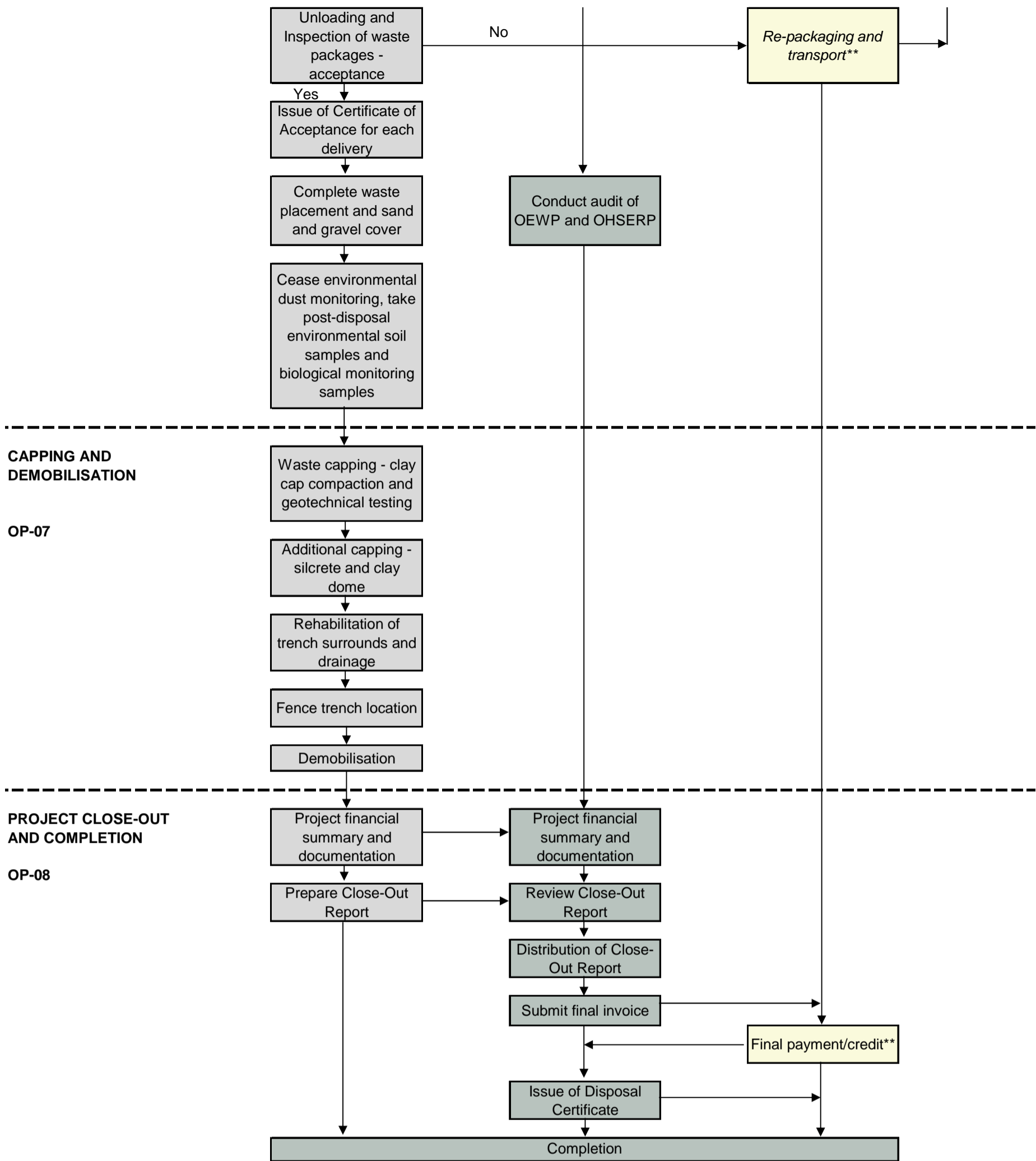


PLANNING, DOCUMENTATION AND REGULATORY APPROVALS

OP-02







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
- OHSERP Operation Health & Safety and Emergency Response Procedures

APPENDIX P

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	Waste Hierarchy The waste hierarchy is enshrined in section 5(1)(c) of the Waste Avoidance and Resource Recovery Act 2007 (WARR Act): 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	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	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	1	3	3	2	1	medium	medium	medium	low		
	Accident	Fire	Air Impact	Emergency	3	3	3	2	4	significant	significant	medium	high	Use of PPE OHSERP Waste specific training Correct equipment present.	ERP-01 ERP-02 ERI-04 OP-05 ERI-05
			Damage to flora and fauna	Emergency	3	3	3	3	1	significant	significant	significant	low		
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			
		Groundwater contamination	Emergency	1	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			
			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	1	significant	significant	significant	significant	Vehicles available	ERI-04 ERP-2 ERP-01 OP-05
			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	1	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	OP-03,	
			Noise-excessive	Infrequent	2	1	1	1	1	Low	low	low	low			
		Process failure	Dust	Infrequent	1	1	1	1	1	1	low	low	low	low	Removed vegetation stockpiled for rehabilitation Dust suppression techniques Stability of trench regularly checked by geologist or geotechnical engineer	
			Noise-excessive	Infrequent	1	1	1	1	1	1	low	low	low	low		
			Erosion	Infrequent	1	3	2	2	1	medium	low	low	low			
		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	ERI-03 SI-07 OP-03 ERP-01	
	Noise		Frequent	5	1	1	1	1	significant	significant	significant	significant	Dust minimization techniques			
	Fire and explosion		Frequent	1	3	3	3	3	medium	medium	medium	medium	Training			

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		
			Dust	Frequent	4	1	1	1	1	medium	medium	medium	medium	Firefighting equipment	
			Clearing vegetation	Frequent	4	3	2	1	1	significant	significant	medium	medium	Vegetation checked to ensure it is not priority species	
		Personnel not trained	Soil contamination	Infrequent	2	3	2	3	1	medium	low	medium	low	Induction training	MP-08 FMP-03 OP-03
			Storm water contamination	Infrequent	2	3	2	3	1	medium	low	medium	low	FMC to ensure contractors are qualified for job	
			Groundwater contamination	Infrequent	1	3	2	3	1	medium	low	low	low	Waste specific training	
			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	SI-07 SI-05 SP-01 SI-01
			Noise	Frequent	5	2	1	1	1	significant	significant	significant	significant	Use of PPE	
			Vehicle accidentally falling into trench from surrounding surface area	Infrequent	4	1	2	2	3	medium	significant	significant	significant	Personnel appropriately qualified for the job Appropriate windrow / operational bunding construction around trench	
		Use of explosives to blast silcrete	Fire	Frequent	2	3	2	2	1	medium	low	low	low	Use of PPE	ERI-03 ERP-01 SP-02 SI-01
			Explosion	Frequent	2	3	2	3	3	medium	low	medium	medium	Safety Manager present	
			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		

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		
			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 OP-06	
	Noise-excessive	Infrequent	2	1	1	1	1	low	low	low	low	Dust suppression techniques			
Operation of heavy machinery	Noise	Frequent	5	1	1	1	1	significant	significant	significant	significant	Regular safety checks of machinery	OP-06 EP-06 SI-07		
	Dust	Frequent	5	1	1	1	1	significant	significant	significant	significant	Site safety manager present			
	Road safety-accident resulting in injury	Emergency	2	1	2	2	3	low	low	low	medium	First aid officer present Dust suppression techniques used			

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			
		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 and	Falling debris/cave in	Frequent	2	2	1	2	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	3	low	low	low	medium	Use of PPE If hazardous atmospheres are suspected, risk assessment, entry permit and air monitoring Correct equipment First aid officer on site	
	Limited access in emergencies				Frequent	2	1	1	1	3	low	low	low	medium		
	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	1	low	low	low	low	Dust suppression techniques PPE	EP-06 OP-07
			Noise-excessive	Infrequent	2	1	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	3	high	significant	significant	significant	Audits to ensure compliance with legislation	MP-02 FMP-5 MP-13
Environment			Infrequent	3	4	3	3	1	1	high	significant	significant	low			
Prosecution			Infrequent	2	4	3	3	1	1	significant	medium	medium	low			
Personnel not properly trained		Soil contamination	Infrequent	2	4	3	3	1	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	1	significant	medium	medium	low				
	Groundwater contamination	Infrequent	1	4	3	3	1	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			
			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	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	Infrequent	2	1	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	1	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				
		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 Emergency team established and on standby	ERP-01 ERP-02 ERI-01 ERI-02 ERI-03	
			Storm water contamination	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		ERI-04
			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 Waste specific training First aid officer and equipment on site	ERI-04 ERI-03 ERI-02 ERI-01
			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		
	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	1	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
		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	FMP-03, MP-09 EP-03 EI-01, EI-02, EI-03, EI-04 RI-1, RI-2

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		
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	Monitoring equipment checked	EP-03
			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	1	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 Monitoring log	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		
			Groundwater contamination	Infrequent	1	4	3	3	1	significant	medium	medium	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 of activities	Infrequent	3	1	3	3	1	Low	significant	significant	low	CLC meetings	Management Plan 10	
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		
			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		

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	3	3	3	1	medium	medium	medium	low			
			Noise-excessive	Infrequent	4	1	1	1	1	1	medium	medium	medium			medium
			Dust	Infrequent	2	1	1	1	1	1	low	low	Low			low
			Air impact	Infrequent	2	5	1	1	1	1	high	low	low			low
			Public criticism	Infrequent	3	4	3	3	1	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 Corrective Action Request form	MP-11 FMP-11 MP-13 FMP-5	
	Training	Non-compliance	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	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	MP-09 FMP-3 FMP-4 MP-11	
			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	OP-5 FMP-5 MP-13	
			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			
			Disturb local flora or fauna.	Infrequent	3	4	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		
	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

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.

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	<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. Some of the key changes implemented by the Act include: 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" Fines: the fines for taking threatened flora or taking, possessing or disturbing threatened fauna have significantly increased. Obligation to report - there is an obligation to report an occurrence of threatened species or threatened ecological communities if found during field work.	EP-02, EP-05
	<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.	All operational and ongoing management environmental procedures



	<p><i>Environmental Protection (Clearing of Native Vegetation) Regulations 2004</i></p> <p>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></p> <p>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><i>Conservation and Land Management Act 1984</i></p> <p>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><i>Soil and Land Conservation Act 1945</i></p> <p>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><i>Bush Fires Act 1954</i></p> <p>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 <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>1.Land Outside Town Sites</p> <p>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.</p> <p>1.2 The removal of flammable material from the whole of the land between the firebreaks required in paragraph 1.1 above.</p>	EP-08, SP-02, ERI-03, ERP-02



	<p><i>Agriculture and Related Resource Protection Act 1976</i></p> <p>Weeds</p> <p>The principal legislation for weeds is the <i>Agricultural and Related Resources Protection Act 1976</i> (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 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>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>	<p>OP-05, OP-06</p>
<p>Waste Management</p>	<p><i>Waste Avoidance and Resource Recovery Act 2007</i></p> <p>The primary objective of the <i>WARR Act 2007</i> 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 <i>WARR Act 2007</i> also reflects the principles set out in the <i>Environmental Protection Act 1986</i> section 4.</p>	<p>Waste Acceptance Guidelines sets out the waste hierarchy - assessment of waste proformas includes consideration of the waste hierarchy</p>
<p>Contaminated Sites</p>	<p><i>Contaminated Sites Act 2003</i></p> <p><i>The Contaminated Sites Act 2003</i> (Act) provides a regulatory scheme for dealing with sites that are known or suspected to be contaminated. 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. Certain contaminants are dealt with under different legislation. For example: for radioactive materials - see the <i>Radiation Safety Act 1975</i></p>	



Dangerous Goods	<p><i>Dangerous Goods Safety Act 2004</i></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><i>Dangerous Goods Safety (General) Regulations 2007</i></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
Emergency Response	<p><i>Emergency Management Act 2005 (WA)</i></p> <p>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></p> <p>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></p> <p>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> (Updated 11 Sept 2021)</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>Work Health and Safety Act 2020</i></p> <p>The WHS Act provides a framework to protect the health, safety and welfare of workers in Western Australian workplaces, and of other people who might be affected by the work.</p> <p>The WHS Act aims to:</p> <ul style="list-style-type: none"> • protect the health and safety of workers and other people by eliminating or minimising risks arising from work or workplaces • ensure fair and effective representation, consultation and cooperation to address and resolve health and safety issues in the workplace • encourage unions and employer organisations to take a constructive role in improving work health and safety practices • assist businesses and workers to achieve a healthier and safer working environment • promote information, education and training on work health and safety • provide effective compliance and enforcement measures • deliver continuous improvement and progressively higher standards of work health and safety. <p>In furthering these aims, regard must be had to the principle that workers and other persons should be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work as is reasonably practicable.</p> <p>For these purposes, 'health' includes psychological health as well as physical health.</p>	SP-01, SP-02, SI-01, SI-02, SI-03, SI-04, SI-05, SI-06, SI-07
	<p><i>Fire Brigades Act 1942</i></p> <p>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><i>Dangerous Goods Safety Act 2004</i></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><i>Dangerous Goods Safety (General) Regulations 2007</i></p>	
	<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><i>Public Health Act 2016</i></p> <p>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	<i>Main Roads Act 1930</i> 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.	OP-05, SI-05
	<i>Public Health Act 2016</i>	OP-02
Air Quality		
Water Management and Protection	<i>Country Areas Water Supply Act 1947</i> <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>	OP-02, EP-04
	<i>Land Administration Act 1997</i> 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.	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. The Aboriginal Heritage Act 1972 (WA) continues to operate in Western Australia, but will be superseded, upon the completion of regulations, by the Aboriginal Cultural Heritage Act 2021 (ACH Act)	OP-02, OP-03



	<p><i>Aboriginal Cultural Heritage Act 2021</i> Received Royal Assent 21 Dec 2021</p> <p>The ACH Act provides a new framework for the recognition, protection, conservation and preservation of Aboriginal cultural heritage.</p> <p>Before the ACH Act comes into operation there will be a transitional period of at least 12 months during which the regulations, statutory guidelines and operational policies will be developed to ensure the ACH Act will have its intended effects.</p> <p>The transitional period will allow for the new Aboriginal cultural heritage management system to be fully established and to enable parties to prepare for the new system. During the transitional period the Aboriginal Heritage Act 1972 will remain in force to allow proponents to continue to seek section 18 consent for any activity that will impact Aboriginal sites. Any section 18 consents applied for and granted during this period will be limited to 5 years and will be subject to additional protection mechanisms, including the requirement to report new information about the existence or the characteristics of Aboriginal cultural heritage.</p>	OP-02, OP-03
	<p><i>Heritage Act 2018 (1 August 2021)</i></p> <p>An Act to —</p> <ul style="list-style-type: none"> • recognise the importance of, and promote understanding and appreciation of, Western Australia’s cultural heritage; and • provide for the identification and documentation of places of cultural heritage significance and for the conservation, use, development and adaptation of such places; and • repeal the Heritage of Western Australia Act 1990; and • make consequential amendments to various other Acts, and for related purposes. 	OP-02, OP-03

PRINCIPLE COMMONWEALTH LEGISLATION AND OTHER REQUIREMENTS

Topic	Legislation	Relevant Procedures
Environmental Protection	<p><i>Environmental Protection and Biodiversity Conservation Act 1999</i></p> <p>The objectives of the EPBC Act are to:</p> <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	<p>Code for Disposal Facilities for Solid Radioactive Waste (2018)</p> <p>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. 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
	<p>IAEA (2012) The Safety Case and Safety Assessment for the Disposal of Radioactive Waste IAEA Safety Standards Series No. SSG-23.</p>	RP-01, RI-01, RI-02
	<p>National Radioactive Waste Management Act 2012</p> <p>An Act to make provision in relation to the selection of a site for, and the establishment and operation of, a radioactive waste management facility, and for related purposes.</p>	
	<p>Nuclear Non-Proliferation (Safeguards) Act 1987</p> <p>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.</p> <p>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'.</p>	
	<p>Australian Radiation Protection and Nuclear Safety Act 1998</p> <p>Deals with both safety and security issues related to radiation in areas of medical and industrial applications and continues to deal with significant and ongoing risks to the staff of government agencies and to the community in general.</p>	
	<p>Regulatory Guide: Licensing of Radioactive Waste Storage and Near Surface Disposal Facilities, March 2013</p>	Safety assessment & safety case
	Health and Safety	<p>National Code of Practice for the Control of Workplace Hazardous Substances</p>
Transport	<p>Australian Code for the Transport of Dangerous Goods by Road and Rail Edition 7.7, 2020</p> <p>Electronic only</p>	OP-05



	<p>Code for the Safe Transport of Radioactive Material (2019)</p> <p>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	<p>Class Labels for Dangerous Goods AS 1216-2006</p>	EP-07, OP-04, OP-05, OP-06, SP-01
	<p>Selection and Use of Emergency Procedure Guides for the Transport of Dangerous Goods AS2931-1999 (current Nov 2021)</p>	SP-02, OP-05, ERP-01, ERP-02
	<p>Dangerous Goods- Initial Emergency Response Guide HB 76.2004</p>	SP-02, ERP-01, ERP-2, ERI-01, ERI-02, ERI-03, ERI-04
	<p>AS 1678.0.0.001-2004 emergency procedure guide – transport - vehicle fire</p>	
	<p>National Code of Practice for the preparation of Material Data Sheets 2nd edition (NOHSC: 2011 2003)</p>	SP-01, SP-02, ERP-01
Air Quality	<p>Exposure Standards for Atmospheric Contaminants in the Occupational Environment (NOHSC: 3008) 1995 (as amended)</p>	EP-06, SI-04, EI-02
Site Activities	<p>National Standard for the Control of Major Hazardous Facility (NOHSC:2016) 1996</p>	OP-09
	<p>Code of Practice – Excavation 2005 Re-endorsed by Worksafe Feb 2014,2021. It should be noted that this CoP refers to superseded health legislation</p> <p>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.</p>	OP-03
	<p>AS 1940:2017 The storage and handling of flammable and combustible liquids</p>	
Heritage	<p>Native Title Act 1993</p>	OP-02
Planning & Development	<p>Environmental Protection and Biodiversity Conservation Act 1999</p>	OP-02



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
17	10/11/21	Inclusion of Work Health and Safety Act 2020, Heritage Act 2018	LM	MT	MT (16 Dec 2021)
18	22/11/22	Superseded legislation etc previously greyed out now deleted	LM	MT	MT

APPENDIX R

2022 – 2023 Management Review Meeting Minutes



MANAGEMENT REVIEW MEETING INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

MINUTES

Date:	15 December 2022	
Time:	9.15 am to 1.40 pm	
Venue:	Board Room, Dilhorn House, 2 Bulwer St, Perth 6000	
Attendance:	Eleanor Hopkins (EH):	Finance IWDF Project Director
	Sze-Wan Ng (SN):	Finance IWDF Contract Manager
	Mark Shepherd (MS):	FMC Project Director
	Leanne Morton (LM):	FMC Systems Manager
	Stuart Parr (SP):	IWDF Radiation Safety Officer
Apologies:	No apologies	
Meeting Number:	17	

1. Open and Welcome

LM welcomed those present at the 17th IWDF Management Review Meeting (MRM).

LM circulated, via email, the draft agenda seeking input on 7 December 2022 and the final agenda was circulated to all participants at the start of the meeting.

2. Minutes of the Previous Meeting

The draft of the minutes of the previous MRM meeting held, 2 June 2022, were sent to those present at the meeting, via email, 15 June 2022. The draft minutes were finalised and accepted as a true and accurate record on 20 June 2022.

The Community Liaison Committee (CLC) were sent, via email, a copy of the finalised MRM minutes on 23 June 2022. A hardcopy was provided to Jan McLeod prior to the start of the 30 June 2022 CLC meeting.

3. Business Arising from Previous Meeting

3.1 IWDF Waste Inventory Database

3.1.1 Finance Server Upgrade

On November 12, 2022, the Department of Finance (Finance) upgraded the server that the IWDF Waste Inventory Database is stored on from SQL 2008 to SQL 2019.



The upgrade was originally planned for September/October 2021, then rescheduled to May 2022, however in May 2022 the attempted upgrade encountered issues requiring Microsoft engineering involvement. The upgrade was then rescheduled for Saturday, 12 November 2022. The November upgrade was successful with no problems encountered. Testing of the IWDF Waste Inventory database post the upgrade was undertaken by LM on the 12 November. The IWDF database was functioning as it should, and the results were reported to the upgrade team.

3.1.2 Database Record Changes

Work on modifying records was significantly restricted for four weeks, 22 October – 25 November, due to issues with accessing the database via Citrix. This issue has now been resolved by Finance ICT.

Chemical Records

There is still work to be done in the IWDF Waste Inventory Database to expand the chemical records for the 1997, 1998, 2000, 2002 and 2008 disposal operations. Work on the chemical records has been put on hold while work on modifying the radioactive records is undertaken.

Radioactive Records

SP has made all the radioactive activity modifications to the records to determine total activities for the various radioisotopes required for input into the operation and post closure safety assessments.

LM has conducted a 10% random review of all the radioactive records. This review of the radioactive records was not undertaken after the release of the final production database in February 2021 as all work on the database was stopped by Finance at this time due to budget restrictions.

After conducting the 10% review of the radioactive records it was clear that there were some issues with the records:

i) There were errors in the mapping from the original spreadsheet to the database at the time of uploading, which resulted in some data populating incorrect fields in the database. One example of this incorrect mapping is the total drum weight (say 500kg) has been mapped to the weight of the radioactive source which, if known, is usually < 10 grams. Correction requires all records to be edited to move the information to the correct fields. Records for 2008 and 2002 have been corrected. The 2000 (60% complete), 1994 and 1992 record modifications are ongoing.

ii) For the 2008RT01 radioactive records, there were a significant number of drums grouped together. The principle of the database requires that each record describes an individual package (drum, bulka bag etc.). All the grouped drums needed to be split into individual drums. This required the use of the original disposal data to inform the modification of existing records, and the creation of additional records. Once this was done the radioactive activities for each drum needed to be recalculated. The modifications to



the 2008 radioactive database records have now been completed, after conducting substantial modifications.

It was agreed that :

- the Waste Inventory Database will be finalised by 31 March 2023; and
- for the 1997NRT01 disposal where the delivery data is not available, a file note capturing the reason and signed by the FMC and IWDF Project Director is produced.

3.2 DWER Licence Renewal – Status Update

DWER renewed the licence for the IWDF on 16 August 2022. The licence (L8190/2007/2) commenced on 18 August 2022 and has been granted for a period of 20 years with an expiry of 17 August 2042.

Additional conditions have been added to the renewed licence. As per DWER's decision report, the conditions are 'commensurate with the determined controls and necessary for administration and reporting requirements.' The majority of the conditions are already being met through existing monitoring and reporting activities and operational requirements for the IWDF.

3.3 Reporting to Radiological Council of Western Australia (RCWA) (2020 – 2021 PCR)

SN notified the RCWA, via email, that the 2020 - 2021 PCR was now finalised and was available on WA.gov.au IWDF page from the 30 August. Due to the size of the report, a copy was not attached to the email.

3.4 RCWA Feedback on Publicly Available Waste Inventory Database Spreadsheet

Finance met with the Radiation Health Unit (RHU) of RCWA in October 2022. RHU reiterated their preference to remove location information in the public waste spreadsheet.

The Management Team noted that the location information proposed for inclusion in the public waste database was already publicly available through the disposal close-out reports. Furthermore, the requirement is imposed by the EPA through Ministerial Statement 562.

3.5 Legal Deposit

As reported at the last MRM, IWDF Progress and Compliance Reports (PCRs) (post 2008), Handbooks (all versions) and brochure (all versions) are required to be provided to the State Library to comply with the *Legal Deposit Act 2012*. Submission of documents to the State Library has not occurred since 2008. After discussion with the State Library, it was agreed that the backlog of documents would be provided to the State Library when



the 2020 – 2021 PCR was finalised. Due to a backlog in cataloguing the State Library have requested that submission of documents be delayed until the 2021 – 2022 PCR is finalised.

3.6 Finance IWDF Website Content

The IWDF Handbook, 2-page brochure and 2020 – 2021 PCR are available on the IWDF webpage on WA.gov.au.

The IWDF Handbook was updated in early December 2022 changes include:

- Where required, reference to the most recent monitoring event e.g., the gamma radiation survey Oct 2022.
- The October 2022 rehab monitoring photo in section 5.3.
- Figure 4 has been replaced with a simpler version.
- Where required, parts of the flow diagram have been replaced with parts from the latest version of the flow diagram in Section 4.

The new version (Version 18) was uploaded to the website on the 12 December 2022.

No changes have been made to the 2-page brochure. It was agreed that the 2-page brochure would be updated with Finance's new branding.

Action: LM to send Word version of 2-page brochure to SN who will update with new branding and upload to the IWDF webpage.

4. IWDF Management Systems

LM reported that all the document control matrices and registers were reviewed and updated, where required, just prior to the MRM.

4.1 Environmental, Health & Safety and Quality Policy Review

The Environmental, Health & Safety and Quality Policy was reviewed for suitability in line with the required review period. The policy was considered fit for purpose by the Management Team and would remain as is until the next review period.

Action: EH to sign and date the reviewed policy, SN to send to LM for inclusion in the Finance manual.

4.2 IWDF Management Plans

LM reported that a review of the Management Plans was undertaken in November/ December 2022. A summary of changes made is provided in the table below.



Management Plan	Version	Review Date	Change
1 Air Quality	V26	03/12/22	Update to include Confined Spaces CoP requirements
2a Decommissioning and Rehabilitation - A	V26	03/12/22	Monitoring dates updated
2b Decommissioning and Rehabilitation - B	V26	03/12/22	Monitoring dates updated
4 Flora and Fauna	V26	03/12/22	Review dates for priority flora and weed identification kits updated
5 Health and Safety	V26	03/12/22	Improvement Program – WHS Act moved from improvement program to management program Key Responsibilities – minor change to title of Safety Officer – previously Health and Safety
6 Radiation	V26	03/12/22	Update to Management Target, Management Program, and Performance Monitoring to include dose constraint (safe limits for the public)
10 Community Liaison	V26	03/12/22	Relevant Docs & Procedure and Forms updated to include Finance R&D Schedule. Old forms have been archived.

4.3 Management Manuals

The Finance Management Manual was reviewed and updated in November 2022. Changes included:

- Section 3.1 updated with new DWER Licence conditions;
- Section 5.5 updated governance structure.

The FMC Management Manual was reviewed and updated in early December 2022. Changes were made to Figures 1a, 1b (changes to responsibilities), and 3 (minor corrections to flow chart).

4.4 Registers

LM reported that the Aspects and Impacts and Legislative and Other Requirements Registers were reviewed and updated, where required, in November 2022.

The Aspects and Impacts Register was updated to include the requirements from the confined Spaces Code of Practice released in July 2022.

4.5 Finance EHSMS and Procedures

All Finance procedures were reviewed and, where applicable, updated in July 2022. Although review was not required until November 2022 the review occurred in July as the Department of Finance rebranded and all procedures were updated to reflect this rebranding.



A summary of changes made is provided in the table below.

Procedure	Section	Change
<i>MP-09 Training</i>	4.3	Prior to visiting the IWDF Finance personnel must complete the General Safety Induction as required by FMC Procedure FMP – 03.
<i>MP-10 Procurement</i>		Updated in September to reflect Finance's current procurement practices.
<i>MP-14 Access Road Management and Traffic Control</i>	5.7	Removed requirement for “‘Road Closed’ signs for wet road/dangerous conditions” (This has been discussed with Road Use agreement holders who have advised that the signs are not used as it is not always practical or safe to travel to the end of the road to change the sign in wet/dangerous conditions. Given that an email notification is sent to all road users for closure and reopening, Finance has no concerns regarding the level of communication.)
	5.9.2	Removed requirement for Agreement holders to seek Finance approval prior to closing the road to prevent damage to the road. Agreement holders only need to notify Finance.

As required by MP-12 Management Review, Finance Manual and Procedures were uploaded to Finance on the 13 December 2022.

4.6 FMC EHSMS & FMC Procedures

FMC procedures were reviewed and updated, as required, during November/December 2022. Where required, procedures were updated to reference the *Work Health and Safety Act, 2020* (WHS Act).

Other significant updates were:

Procedure	Section	Change
<i>Training and Competency Procedure - FMP -03</i>	5.1.4 Review of training requirements	FMC personnel visiting the IWDF site shall complete the General Safety Induction (General Safety Induction, IWDF-Form-32) prior to the site visit if they have not visited the IWDF site for three years or more.
<i>Excavation Safety Instruction SI-01:</i>	5.6 Hazardous Atmospheres	If hazardous atmospheres are suspected (based on the geological situation of excavations and experience at the site, it is not considered likely that hazardous



Procedure	Section	Change
		<p>atmospheres will be generated) the following actions shall be implemented:</p> <ul style="list-style-type: none"> • A risk assessment will be completed by a competent person prior to personnel entering the trench. • A confined space entry permit detailing the precautions required will be issued to personnel entering the trench. • Air monitoring will be conducted in any trench more than 1.2 m deep.
<i>Occupational Radiation Monitoring RI-02</i>		Purpose and scope have been expanded to include measurement of public dose exposures. Minor changes such as correction of form numbering in appendices.

4.7 Performance and Compliance Reporting (PCR)

Work has commenced on the draft 2021 – 2022 PCR but has now been put on hold until the work on the IWDF Waste Inventory Database is complete.

A draft copy of the 2021 – 2022 PCR will be provided to Finance at the 24 January 2023 Ongoing Environmental and Operational Management (OEOM) meeting.

4.8 Annual Review of Finance R&D Schedule

SN confirmed she had reviewed Finance’s Retention and Disposal Schedule and found it satisfactory.

The Finance records management team have advised that the schedule was updated in 2020 and is not due for review until 2025.

LM had previously reported that she had emailed some suggested changes to the previous IWDF Project Director. LM forwarded the email with comments and suggested changes to IWDF Contract manager and Project Director on the 13 December 2022.

5. Action Plans

5.1 2021 – 2022 Action Plans

LM reported that to date performance against the 2022 – 2023 Action Plans was good. The incomplete actions were waiting on external input but were progressing well.

The outstanding actions are provided in the table below.



Action Plan	Improvement Target	Action	Responsibility	Required Completion Date	Status
6 Radiation	Finalised Waste Inventory Database made publicly available	Update and/or complete chemical and radioactive records in the database and publish the records	RSO & FMC Project Manager	31 Dec 2022 – MT agreed to change completion date to 31 March 2023	Ongoing
6 Radiation	Completed procedure for providing public access.	Draft a detailed procedure for allowing public access to the waste registers (chemical & radioactive)	Finance Project Manager	December 2022	Waiting on final review of production database
6 Radiation	Safety Assessment/Case	Update the Operation Safety Assessment and Safety Case with changes as requested by ARPANSA and agreed by RCWA.	RSO	June 2022 – MT agreed to change completion date to 31 Jan 2023	Work is ongoing – waiting on input from RCWA re: total activities.

6. Compliance Audits Internal and External

6.1 Ministerial Statement

A six-monthly compliance audit against Ministerial Statement 562 was completed. **One** non-compliance was recorded.

The proponent is non-compliant with Commitment 8 which requires the proponent to convene a minimum of four CLC meetings a year. For the 2021 – 2022 reporting period only three CLC meetings were held, October 2021, February 2022, and June 2022.

It should be noted that at the 14 October 2021 CLC meeting, the CLC agreed to hold three meetings per year.

6.2 Licences, Permits and Registrations

No non compliances were recorded.



6.3 Finance Management System

One non-compliance was recorded.

MP-08 requires the proponent to hold CLC meetings at least four times per year. For the reporting period, CLC meetings were held 14 October 2021, 10 February 2022, and 30 June 2022.

It should be noted that at the 14 October 2021 CLC meeting, the CLC agreed to hold meetings three times a year unless activities at the IWDF, such as a disposal operation, require an increase in meeting frequency.

6.4 FMC Management System

No non-compliances were recorded.

6.5 Management Plans

One non-compliance was recorded for *Management Plan 10 – Community Liaison* which requires four CLC meetings to be held each year. For the 2021 – 2022 reporting period only three CLC meetings were held, October 2021, February 2022, and June 2022.

It should be noted that at the 14 October 2021 CLC meeting, the CLC agreed to hold meetings three times a year.

6.6 Ongoing Suitability of Management Plans

Given the ongoing review undertaken over the past six months and the subsequent applicable changes made to the various system documents it was concluded by the IWDF Management Team that the management plans and other system documents continue to be fit for purpose.

6.7 Liaison with National and International Intractable Waste Management Facilities

LM reported that the websites for similar facilities have been reviewed regularly over the last six months to ensure that any changes to the operational processes for these facilities is considered against the current operation processes for the IWDF and, if appropriate, changes are made to the procedures for the IWDF to ensure continual improvement and best practice. No changes have been required over the past six months.

7. Non-conformance and Corrective Action Requests

There is one outstanding Corrective Action Requests (CARs) from recent audits. The CAR, initially raised June 2022, was related to the number of CLC meetings held during the audit period. Although the CLC has agreed to hold three meetings per year a formal



application to have this change reflected in the Ministerial Statement 562 has not yet been completed.

8. Electronic Document Library

LM reported that the Electronic Document Library had been updated to include the following document:

Work Health and Safety Commission, (2022) *Confined Spaces: Code of practice*, State of Western Australia, Department of Mines, Industry Regulation and Safety 55pp.

9. Guidelines – Updates and Changes

The following guidelines were reviewed in November 2022, but no changes were required:

- Chemical Guidelines – waste acceptance proforma PDF fillable form (Revision 15, March 2021).
- Radioactive Guidelines – waste acceptance proforma PDF fillable form (Revision 18, December 2021).

10. Monitoring

10.1 Groundwater Monitoring

Groundwater monitoring for October 2022 has been completed and no groundwater has been detected in any of the monitoring bores. Next groundwater monitoring is scheduled for April 2023.

10.2 Capping Monitoring

Capping monitoring was last completed in October 2022 with no capping issues reported. Next capping monitoring is scheduled for October 2023.

10.3 Rehabilitation Monitoring (Annual)

Rehabilitation monitoring was last completed in October 2022. It should be noted that the October 2022 rehabilitation monitoring did not include the disposal cells established prior to 2000 as the rehabilitation for these cells has been assessed by a botanist and deemed complete. Next rehabilitation monitoring is scheduled for October 2023.

After a review of recent rehabilitation monitoring reports and aerial photography, flown October 2021, as shown on the “Gamma Radiation Measurement Locations” figure attached, it was decided that the rehabilitation of the vegetation around the 2000RT01



disposal cell should now be considered complete. It was therefore agreed that rehabilitation monitoring for 2000RT01 would not be required from October 2023.

10.4 Dose Constraint Monitoring

Thermo-Luminescent Dosimeter (TLD) badges have been issued to MS with one control placed at the site office to monitor whole body dose exposures during site monitoring activities. This monitoring encompasses 6 separate site visits to undertake surveillance and monitoring of the site. Dose exposure data is available for the April 2021 to Oct 2022 period.

Results returned a dose exposure that was below the Minimum Detection Level (MDL) of 0.01 mSv for each quarter. The total accumulated dose for the year was 0.02 mSv. A public dose constraint has been set for the IWDF of 0.3 mSv/year in line with International Atomic Energy Agency (IAEA) and Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) guidance. Dose exposures were well below the dose constraint.

10.5 5-yearly Radiation Monitoring Planning

The 5-yearly gamma survey was undertaken during the scheduled site monitoring visit in October 2022. A report will be issued to the RCWA for information on 9th January 2023.

The absorbed gamma radiation levels in 2022 are consistent with the previous surveys and the levels have remained constant throughout each of the radiation cell compounds. The median results range from 0.11-0.16 $\mu\text{Gy/h}$ (0.08-0.11 $\mu\text{Sv/h}$) are in good agreement with the typical gamma dose rate levels for the Perth Coastal Plain which has a range of 0.05 to 0.19 $\mu\text{Sv/h}$ depending on local geological characteristics and the average levels for Australia of 0.10 $\mu\text{Sv/h}$. The radiological conditions for the IWDF have remained stable and are at normal background radiation levels, and therefore present no health risks to the public or the environment.

11. IWDF Infrastructure

11.1 Access Road - Current Management Status Report

The Access Road continues to be well managed under the road use agreement with Tellus Holdings Ltd. Yilgarn Iron Pty Ltd, a wholly owned subsidiary of Mineral Resources Ltd (MRL), continue iron ore haulage operations on the Access Road in accordance with their road use permit.

MRL has worked with Main Roads to upgrade the intersection of Great Eastern Highway and the IWDF Access Road. The works included widening of the intersection and construction of an Auxiliary Left turning treatment. Works were completed by MRL and inspected by Main Roads in November 2022. Main Roads are satisfied with the upgrade works.



11.2 Access Road - Current Condition Report

MS reported that the Access Road, as assessed in October 2022, was in good condition.

11.3 Disposal of Replaced Genset

At the previous MRM, it was reported that the old genset would be auctioned at Ross's Auctioneers & Valuers in Kalgoorlie, subject to clarification of the auction terms and conditions. The terms and conditions in question related to the charging of withdrawal and storage fees which contradicted the information provided by Ross's via phone. No response was received from Ross's despite follow up.

Hampton Transport Services (HTS) Pty Ltd, who had transported the genset from the IWDF, had previously offered to purchase the genset, however, Finance enquired with two auction houses to ensure value for money and open and effective competition commensurate with the value of the good was achieved. Given the costs and risks associated with auction at Ross's, it no longer represented the best value for money and the genset was sold to HTS.

11.4 Firebreaks

MS reported that vegetation regrowth in the firebreaks was sprayed with poison during the October 2022 monitoring site visit. The result was assessed during the 29 November 2022 CLC site visit and all vegetation in the firebreaks had died however remnants of the vegetation remain therefore the status of the vegetation will be checked during the April monitoring visit.

12. Staff Training

At the last MRM it was agreed to introduce a formal timeframe after which IWDF general safety induction training is required to be retaken. After discussion at the August monthly meeting, it was agreed the General Safety Induction must be renewed every 3 years if the person has not visited the IWDF for 3 years. This new requirement was included in Finance *MP-09 Training* and FMC *FMP-03 Training and Competency Procedure*. This requirement was also added to the FMC training register with the date the person last visited the IWDF now recorded to allow notification when training is required to be retaken.

The following Inductions have been completed this year:

Sam Stott (plumber)	IWDF General Safety Induction
Mr Green (electrician)	IWDF General Safety Induction
Shaun Whitmarsh (Department of Finance)	IWDF General Safety Induction
Mark Bryden (Department of Finance)	IWDF General Safety Induction
Robert Tagliaferri (Department of Finance)	IWDF General Safety Induction
Rowan Acton (Department of Finance)	IWDF General Safety Induction
Darcy Malone (Department of Finance)	IWDF General Safety Induction



The CLC members visiting the IWDF in November were provided with a condensed General Safety Induction. A full General Safety Induction was not required as the CLC members were always accompanied by FMC personnel.

13. Radioactive Issues

13.1 IWDF Safety Assessment and Safety Case

There are three separate deliverables in production:

- Post-Closure Safety Assessment (PCSA) based on agreed postulated external accident events during the Institutional Control Period (ICP) and agreed future limits on radioactive inventories for disposal (based on database records).
- Operations Safety Assessment (OSA) based on previous draft OSA and incorporating requirements of RPSC-3 Disposal Code and ARPANSA recommendations (this part applies to PCSA too).
- Facility Safety Case (FSC) which will refer to OSA, PCSA, and historical safety assessments for siting, design, and construction of the IWDF.

Post-Closure Safety Assessment – RHU will consider the activity limit to be set for IWDF post-closure, which will be based on the known total inventories for each trench/shaft against each isotope type from database records. The deterministic and probabilistic assessments for accident scenarios will be completed against the limiting source inventories being defined.

Operations Safety Assessment – RHU will consider the activity limit to be set for IWDF disposal operations which will be based on the limits as specified in the Transport Code RPSC-2. This would remove the need to do individual deterministic and probabilistic assessments under each Waste Acceptance Proforma (WAP), which will save costs, if the client isotopic inventories are below the limits as set within the OSA, and therefore could be approved automatically.

Facility Safety Case – this is under production and will require the PCSA and OSA to be completed as these documents will form some of the basis of the safety case arguments to be made. Historical safety assessments for the siting, design, and construction of the IWDF will also be included as part of the safety case arguments.

14. Community Liaison Committee

14.1 CLC Visit to the IWDF

Eleven members of the CLC visited the IWDF on 29 November 2022. The visit was very successful. A CLC meeting was held at the IWDF during the visit.



14.2 Meeting Frequency – submission to EPA to vary frequency status update

Submission of a formal request to the EPA is awaiting approval from senior management.

CLC meetings are scheduled for 16 February and 22 June 2023.

15. FMC Performance

15.1 Performance Against FMC 2021 - 2022 Estimated Costs

MS reported that performance against the 2021-2022 FMC cost estimate was on track.

15.2 FMC Performance Against Finance Contract Management Plan

Performance against the Task Calendar has been good, particularly considering the prioritisation of work on the IWDF database.

Completion of action items from the Ongoing Environmental and Operational Meetings (OEOM) have generally been completed in a timely manner.

16 Other Business

16.1 Disposal Applications

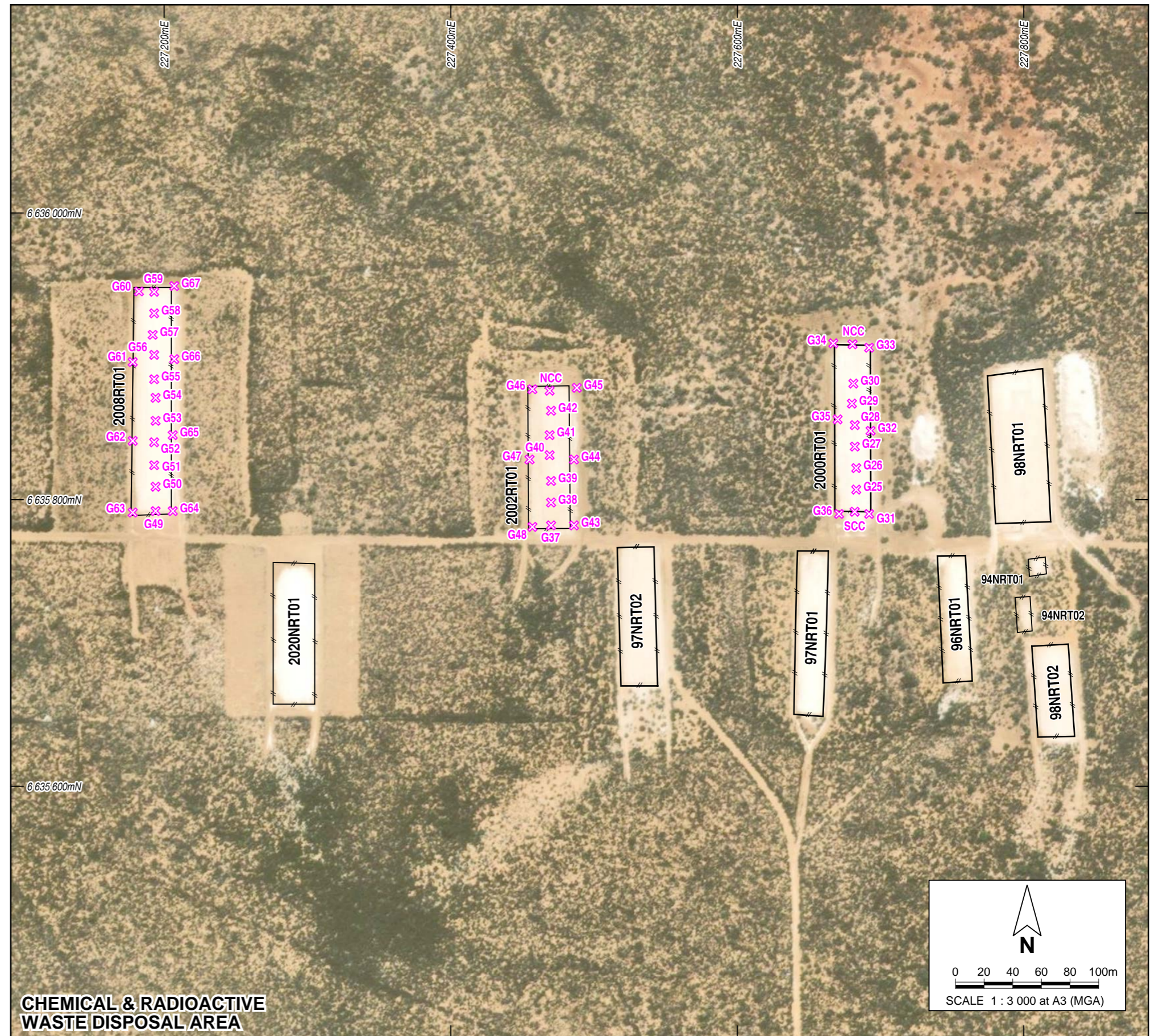
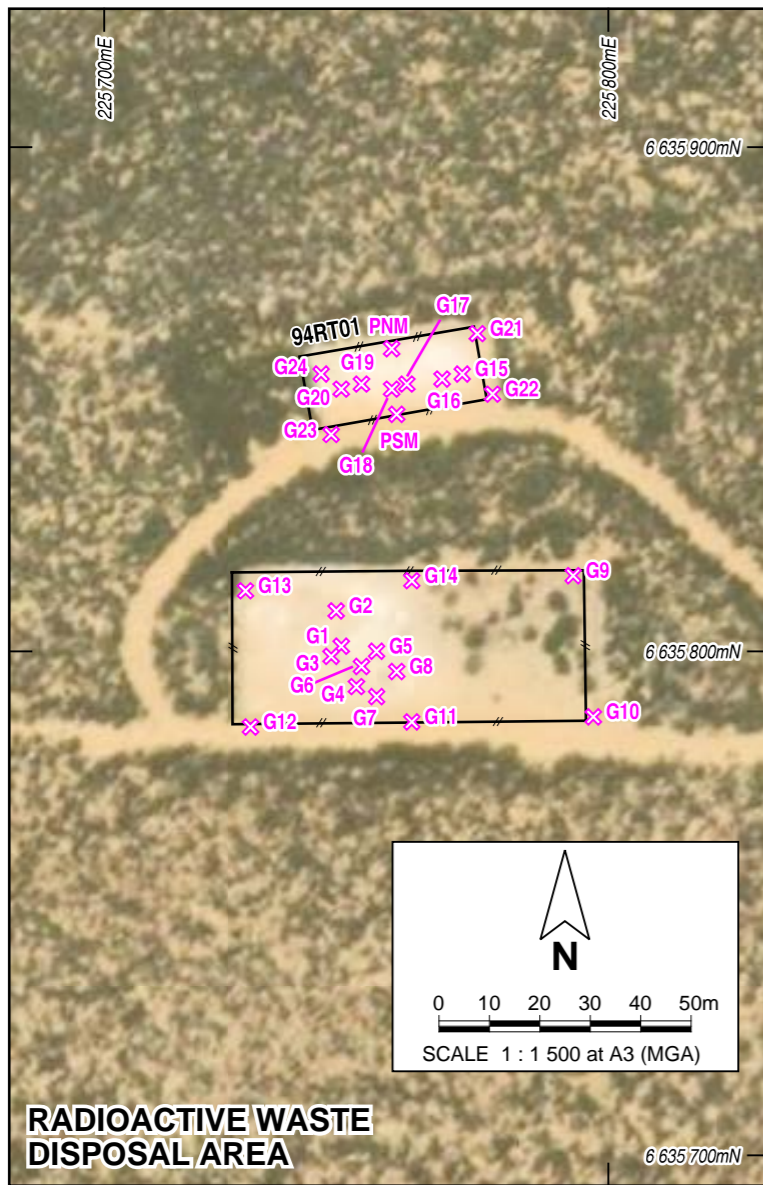
One new application to dispose of radioactive waste has been received since the last MRM for the disposal of legacy clean-up waste from oil processing (NORM). The radioactive waste has been assessed as acceptable for disposal against the waste acceptance criteria and a disposal permit has been granted by the Radiological Council.

Stage of progress	Radioactive	Chemical
Approved applications	21 (partial)	0
Applications under assessment	1	0
Applications awaiting assessment	0	0
Waste enquiries in progress	0	0

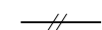


Partial – some radioactive wastes declared for disposal will require further justification and resubmission to RCWA.


17 Next Meeting

To be scheduled for June 2023.



Legend

-  Fence
-  2008RT01 Trench or Shaft ID
-  Gamma Radiation monitoring Location

 <p>Government of Western Australia Department of Finance</p>	<p>INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST, WESTERN AUSTRALIA</p>		<p>Figure 1</p>
	<p>GAMMA RADIATION MEASUREMENT LOCATIONS</p>		
Drawn: M. Shepherd	Date: 22 Dec 2022		



MANAGEMENT REVIEW MEETING INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

MINUTES

Date: 13 June 2023
Time: 9.45 am to 1.45 pm
Venue: Board Room, Dilhorn House, 2 Bulwer St, Perth 6000
Attendance: Eleanor Hopkins (EH): Finance IWDF Project Director
Sze-Wan Ng (SN): Finance IWDF Contract Manager
Mark Shepherd (MS): FMC Project Director
Leanne Morton (LM): FMC Systems Manager
Apologies: Stuart Parr (SP): IWDF Radiation Safety Officer
Meeting Number: 18

1. Open and Welcome

LM welcomed those present at the 18th IWDF Management Review Meeting (MRM).

LM circulated, via email, the draft agenda seeking input on 8 June 2023 and the final agenda was circulated to all participants at the start of the meeting.

2. Minutes of the Previous Meeting

The draft of the minutes of the previous MRM meeting held, 15 December 2022, were sent to those present at the meeting, via email, 10 January 2023. The draft minutes were finalised and accepted as a true and accurate record on 2 February 2023.

A copy of the finalised 15 December MRM minutes was sent, via email, to the Community Liaison Committee (CLC) on 14 February 2023. A hardcopy was provided to Jan McLeod prior to the start of the 15 February 2023 CLC meeting.

3. Business Arising from Previous Meeting

3.1 IWDF Waste Inventory Database

3.1.1 Radioactive Records

Modifications to the radioactive records were completed 31 May 2023.

3.1.2 Chemical Records

Work on the chemical records was put on hold while work on modifying the radioactive records was undertaken.



There is still work to be done in the IWDF Waste Inventory Database to expand the chemical records for the 1997, 1998, 2000, 2002 and 2008 disposal operations. Work on expanding the chemical records will commence July 2023.

It should be noted that the close-out report, with delivery data, for the 1997NRT01 disposal, which was thought to not be available, has now been located at the State Library. This document is not for loan therefore will need to be copied at the State Library and added to the IWDF document library. The delivery documents from this report will be used to populate the 1997NRT01 records in the waste inventory database.

3.2 Legal Deposit.

As reported at the last MRM, IWDF Progress and Compliance Reports (PCRs) (post 2008), Handbooks (all versions) and brochures (all versions) are required to be provided to the State Library to comply with the *Legal Deposit Act 2012*. Submission of documents to the State Library has not occurred since 2008.

After discussion with the State Library, it was agreed that the backlog of documents would be provided to the State Library when the 2020 – 2021 PCR was finalised. Due to a backlog in cataloguing, the State Library has requested that submission of documents be delayed until the 2021 – 2022 PCR is finalised. The 2021 – 2022 PCR has not yet been finalised.

3.3 Finance IWDF Website Content

The IWDF Handbook, 2-page brochure and 2020 – 2021 PCR are available on the IWDF webpage on WA.gov.au.

The 2-page brochure was updated with Finance's new branding in January and uploaded to the website 12 January 2023.

The IWDF Handbook was updated in early June 2023 changes include:

- Updated figures 3 and 6.
- Updates to colour scheme of figures 8 and 9 to reflect new branding colour scheme.

The new version (Version 19) has been provided to the Department of Finance Communications Team for publishing on the website.

It was agreed that the Finance IWDF Website should be a standing agenda item for future MRMs. The agenda standing heading "Community Liaison Committee" will be renamed "Communications" with subheadings for Community Liaison Committee and IWDF Finance Website.

3.4 5- yearly Radiation Monitoring Report

The 2022 Environmental Gamma Radiation Survey was submitted to the RCWA, via email, on the 9 January 2023 to date no response has been received.



4. IWDF Management Systems

LM reported that all the document control matrices and registers were reviewed and updated, where required, just prior to the MRM.

4.1 Environmental, Health & Safety and Quality Policy Review

The Environmental, Health & Safety and Quality Policy was reviewed for suitability in line with the required review period. The policy was considered fit for purpose by the Management Team and will remain unchanged until the next review period.

4.2 IWDF Management Plans

LM reported that a review of the Management Plans was undertaken 8 June 2023. Some minor formatting changes were made to the Management Plans document and a summary of the technical changes made to plans is provided in the table below.

Management Plan	Version	Review Date	Change
6 Radiation	V27	08/06/22	<p>Relevant Documents and Procedures was updated with Operations Safety Assessment V4 Feb 2023, Post-closure Safety Assessment V5 Jan 2023 and Facility Safety Case V4, Mar 2023, as these documents were submitted to the RCWA in Feb and Mar 2023, to replace the 2016 draft documents.</p> <p>Forms updated to include corrected form numbers and titles as in RI-02 Occupational Radiation Monitoring as updated 09/12/2022.</p>

To facilitate increased management team input into the review of the Management Plans it was agreed that one management plan should be reviewed by the management team at each monthly ongoing management meeting.

4.3 Management Manuals

No reviews have occurred in the last six months.

4.4 Registers

4.4.1 Legislative and Other Requirements Register

LM reported that the Legislative and Other Requirements Register was reviewed and updated, where required, in November 2022 to include the *Aboriginal Cultural Heritage Act 2021*, however reporting on significant changes was not included at the December 2022 MRM minutes therefore it will be reported here.



Despite the royal assent for the *Aboriginal Cultural Heritage Act 2021* the *Aboriginal Heritage Act 1972* (WA) continues to operate in Western Australia, but will be superseded, by the *Aboriginal Cultural Heritage Act 2021* (ACH Act) upon the completion of the regulations. This is expected to occur by 1 July 2023.

Although not included in the Legislative and Other Requirements Register the commencement of the *Director’s Liability Reform Act 2023*, 4 April 2023, has required amendments to the following legislation:

- *Aboriginal Cultural Heritage Act 2023*
- *Aboriginal Heritage Act 1972*
- *Biodiversity Conservation Act 2016*
- *Contaminated Sites Act 2003*
- *Dangerous Goods Safety Act 2004*
- *Emergency Management Act 2005*
- *Environmental Protection Act 1986*
- *Heritage Act 2018*
- *Public Health Act 2016*
- *Radiation Safety Act 1975*
- *Waste Avoidance and Resource Recovery Act 2007.*

The amendments to the above legislation are all similar in intent as they are in relation to the criminal liability of directors and other people involved in the management of bodies corporate and other purposes.

4.4.2 Aspects and Impacts Register

The Aspects and Impacts Register has not been reviewed in the last six months.

4.5 Finance EHSMS and Procedures

The review of the Finance procedures for this reporting period has not yet been completed, however there are some suggested changes resulting from the audit in progress. A summary of the suggested changes is provided in the table below.

Procedure	Section	Suggested Change
<i>MP-06 Documents and Data Control</i>	4.5	Suggest removal of <i>As hardcopy documents are now rarely used, document approval shall be indicated by making the electronic version ‘final’ and password protecting the document before distributing to personnel listed on Document Control Matrix. The Document Control Matrix (Finance-MF-06-2) indicates at which location the final version of a document it is retained.</i>
<i>MP-07 Management of records</i>	4.1.1 & 4.1.2	Suggest modification to sections 4.1.1 to remove <i>initial distribution (for action)</i> and 4.1.2 to <i>‘remove date sent.</i>



The management team agreed to remove the statement from MP-06.

The management team agreed to remove the above items from sections 4.1.1 and 4.1.2 of MP-07.

As required by MP-12 Management Review, Finance Manual and Procedures were uploaded to the Finance server on the 13 December 2022. When the review of the Finance Manual and Procedures is completed, they will be uploaded to the Finance Server.

4.6 FMC EHSMS & FMC Procedures

A complete review and update, if required, of FMC procedures will be undertaken in October/November 2023 however there have been some changes made to FMC procedures over the last six months. Significant updates are described in the table below:

Procedure	Section	Change
<i>FMP-01 Document and Data Control</i>	5.7	modified to remove “ <i>The Systems Manager will confirm that documents have been made obsolete, e.g., on the applicable Corrective Action Request, CAR IWDF-Form-10</i> ”.
EP-05 Rehabilitation Management	5.1	<i>The rehabilitated areas shall be...</i> changed to <i>The areas to be rehabilitated shall be</i>
EO-07 Waste Management	5.1	<i>The waste shall be collected and transported off-site by Earthworks Contractor personnel and disposed of at the Southern Cross or Coolgardie ...</i> changed to <i>The waste shall be collected and transported off-site by site personnel and disposed of at the Southern Cross or Coolgardie</i>

4.7 Performance and Compliance Reporting (PCR)

Comments on the draft 2021 – 2022 PCR have been received from the proponent and IWDF CLC. The draft PCR is now with Finance to finalise and publish on the IWDF webpage. Publication is anticipated for late June 2023.

Drafting of the 2022-2023 PCR has commenced and will be finalised in September 2023 as required by the conditions of the new DWER licence.

4.8 Annual Review of Finance R&D Schedule

The Finance Records Management team have advised that the schedule was updated in 2020 and is not due for review until 2025. Improvement suggestions made by the FMC have been provided to the Finance Records Management team and will be considered closer to the review date.



5. Action Plans

5.1 2021 – 2022 Action Plans

LM reported that to date performance against the 2022 – 2023 Action Plans was good. The outstanding actions are provided in the table below.

Action Plan	Improvement Target	Action	Responsibility	Required Completion Date	Status
6 Radiation	Finalised Waste Inventory Database made publicly available	Update and/or complete chemical and radioactive records in the database and publish the records	RSO & FMC Project Manager	31 Dec 2022 – MT agreed to change completion date to 31 March 2023	Radiation complete Chemical is in progress
6 Radiation	Completed procedure for providing public access.	Draft a detailed procedure for allowing public access to the waste registers (chemical & radioactive)	Finance Project Manager	December 2022	Waiting on final review of production database
6 Radiation	Safety Assessment/Case	Update the Operation Safety Assessment and Safety Case with changes as requested by ARPANSA and agreed by RCWA.	RSO	June 2022 – MT agreed to change completion date to 31 Jan 2023	Safety Assessments and case have been submitted to RCWA

5.2 Draft 2022 – 2023 Action Plans

It was agreed that the following actions will be added to the actions plans:

Management Plan	Action
4 - Fauna and Flora	Review the approach to the rehabilitation provision for disposal cells
11 - Management Review	Review the IWDF management systems to look at opportunities for improvement to modernise the way system information is accessed and linked.



6. Compliance Audits Internal and External

6.1 Ministerial Statement

A six-monthly compliance audit against Ministerial Statement 562 was completed. **One** non-compliance was recorded.

The proponent is non-compliant with Commitment 8 which requires the proponent to convene a minimum of four CLC meetings a year. For the 2022 – 2023 reporting period only two CLC meetings have been held to date (November 2022 and February 2023) with a third meeting scheduled for 29th June 2023.

It should be noted that at the 14 October 2021 CLC meeting, the CLC agreed to hold three meetings per year.

6.2 Licence, Permit and Registration

No non-compliances have been recorded to date.

6.3 Finance Management System

One non-compliance will be recorded.

MP-08 requires the proponent to hold CLC meetings at least four times per year. For the 2022 – 2023 reporting period only two CLC meetings have been held to date (November 2022 and February 2023) with a third meeting scheduled for 29th June 2023.

It should be noted that at the 14 October 2021 CLC meeting, the CLC agreed to hold three meetings per year.

6.4 FMC Management System

No non-compliances have been recorded to date.

6.5 Management Plans

One non-compliance was recorded for *Management Plan 10 – Community Liaison* which requires four CLC meetings to be held each year. For the 2022 – 2023 reporting period only two CLC meetings have been held to date (November 2022 and February 2023) with a third meeting scheduled for 29th June 2023.

It should be noted that at the 14 October 2021 CLC meeting, the CLC agreed to hold three meetings per year.



6.6 Ongoing Suitability of Management Plans

Given the ongoing review undertaken over the past six months and the subsequent applicable changes made to the various system documents it was concluded by the IWDF Management Team that the management plans and other system documents continue to be fit for purpose.

6.7 Liaison with National and International Intractable Waste Management Facilities

LM reported that the websites for similar facilities have been reviewed regularly over the last six months to ensure that any changes to the operational processes for these facilities is considered against the current operation processes for the IWDF and, if appropriate, changes are made to the procedures for the IWDF to ensure continual improvement and best practice. No changes to IWDF procedures have been required over the past six months.

7. Non-conformance and Corrective Action Requests

There is one open Corrective Action Request (CAR 007) from recent audits. CAR 007 was initially raised June 2022 and is related to the number of CLC meetings held during the audit period. The non-compliances for the current audit period are the same as those for the previous reporting period therefore CAR 007 has been updated to include the new audit period and remains open.

Although the CLC has agreed to hold three meetings per year, approval to change Ministerial Statement 562 has not yet been received.

8. Electronic Document Library

LM reported that the Electronic Document Library has been updated to include the following amended legislation:

- *Aboriginal Cultural Heritage Act 2023*
- *Aboriginal Heritage Act 1972*
- *Biodiversity Conservation Act 2016*
- *Contaminated Sites Act 2003*
- *Dangerous Goods Safety Act 2004*
- *Emergency Management Act 2005*
- *Environmental Protection Act 1986*
- *Heritage Act 2018*
- *Public Health Act 2016*
- *Radiation Safety Act 1975*
- *Waste Avoidance and Resource Recovery Act 2007.*

LM also reported that the following documents have been included in the document library:



- DMIRS *Dust Strategy 2023-24*.
- DMIRS *Code of practice on managing the work environment and facilities*. The document includes work safe guidance for facilities like the IWDF and contains a useful systems review checklist.

9. Guidelines – Updates and Changes

The following guidelines were last reviewed in November 2022, no changes were required:

- Chemical Guidelines – waste acceptance proforma PDF fillable form (Revision 15, March 2021).
- Radioactive Guidelines – waste acceptance proforma PDF fillable form (Revision 18, December 2021).

10. Monitoring

10.1 Groundwater Monitoring

Groundwater monitoring was undertaken in May 2023 and no groundwater has been detected in any of the monitoring bores. Next groundwater monitoring is scheduled for October 2023.

10.2 Capping Monitoring

Capping monitoring was last completed in October 2022 with no capping issues reported. Next capping monitoring is scheduled for October 2023.

10.3 Rehabilitation Monitoring (Annual)

Rehabilitation monitoring was last completed in October 2022. It was reported that the rehabilitated areas around the 2020NRT01 disposal cell are starting to spread.

Next rehabilitation monitoring is scheduled for October 2023.

10.4 Dose Constraint Monitoring

Thermo-Luminescent Dosimeter (TLD) badges have been issued to MS with one control placed at the site office to monitor whole body dose exposures during site monitoring activities. This monitoring encompasses six separate site visits to undertake surveillance and monitoring of the site. Dose exposure data is available for the April 2021 to December 2022 period.

Results returned a dose exposure that was below the Minimum Detection Level (MDL) of 0.01 mSv for each quarter. The total accumulated dose to date is 0.02 mSv. A public dose constraint has been set for the IWDF of 0.3 mSv/year in line with International Atomic



Energy Agency (IAEA) and Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) guidance. Dose exposures were well below the dose constraint.

It should be noted that the TLD badge dose accumulation has only been recorded for the quarterly periods that encompass the dates of the site visits and therefore the potential public dose exposures are expressed in the Table below.

Period of Site Visit	Dose Exposure (mSv)
30/03/21 to 01/04/21	0.01
31/08/21 to 02/09/21	0.01
22/09/21 to 23/09/21	
11/11/21 to 14/11/21	*M
04/04/22 to 06/04/22	*M
17/10/22 to 20/10/22	*M

*M: dose exposure below the minimum measurable quantity for the monitoring period.

11. IWDF Infrastructure

11.1 Access Road - Current Management Status Report

The Access Road continues to be well managed under the road use agreement with Tellus Holdings Ltd.

11.2 Access Road - Current Condition Report

MS reported that the Access Road, as assessed in May 2023, was in good condition.

11.3 Firebreaks

Inspection of the firebreak during the May 2023 monitoring visit revealed that some minor regrowth has occurred and that another spraying operation should be undertaken during the October visit.

12. Staff Training

No staff training has occurred since the December 2022 MRM.

13. Radioactive Issues

13.1 IWDF Safety Assessment and Safety Case

The IWDF Safety Assessment and Safety Case were submitted to the Radiation Health Unit (RHU) for consideration by the Radiation Council of Western Australia (RCWA) as follows:

- IWDF Post Closure Safety Assessment submitted 27 January 2023
- IWDF Operations Safety Assessment submitted 14 February 2023



- IWDF Facility Safety Case submitted 1 March 2023

RHU have advised the Safety Assessment and Safety Case was tabled at the March RCWA meeting, but the item was deferred to allow members more time to review the documentation. Further feedback from RHU or RCWA has not been received to date.

14. Community Liaison Committee

CLC meetings were held 29 November, 16 February and a meeting is scheduled for 29 June 2023.

A s.45C was submitted to the Department of Water and Environmental Regulation on 2 May 2023 regarding the Committee.

15. FMC Performance

15.1 Performance Against FMC 2022 - 2023 Estimated Costs

MS reported that performance against the 2022-2023 FMC cost estimate was on track.

15.2 FMC Performance Against Finance Contract Management Plan

Performance against the contract management plan has been good, particularly considering the prioritisation of work on the IWDF database and other matters pertaining to the radiological registration.

16 Other Business

16.1 Disposal Applications

Several enquiries have been received, however no new applications to dispose of waste have been received since the last MRM.

17 Next Meeting

To be scheduled for 5 December 2023.

APPENDIX S

2022 – 2023 Action Plans



2022– 2023 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, and Quality 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.					
<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>
Improvement Objective:					
ENVIRONMENTAL ACTION PLAN 2 - REHABILITATION AND DECOMMISSIONING					
Environmental, Health and Safety, and Quality Policy Statement:					
Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health & environmental protection by ensuring the adequacy of the EHSQMS, the 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>
Improvement Objective: Re-establish removed and disturbed habitats to their original level of species diversity and land use					
ENVIRONMENTAL ACTION PLAN 3 - EMERGENCY RESPONSE					

Environmental, Health and Safety, and Quality 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 EHSQMS, the 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
Improvement Objective:					
ENVIRONMENTAL ACTION PLAN 4 - FLORA AND FAUNA					
Environmental, Health and Safety, and Quality 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 EHSQMS, the policy and 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 indigenous habitats to their original level of species diversity; Prevent introduction of non-indigenous species; Prevent the removal or priority flora species					
ENVIRONMENTAL ACTION PLAN 5 - HEALTH AND SAFETY					
Environmental, Health and Safety, and Quality 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 EHSQMS, the 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
Improvement Objective: To confirm the ongoing adequacy of the IWDF EHSQMS 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, and Quality 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
Improvement Objective: to ensure public database is accurate and publicly available.					
Completed procedure for providing public access.	Draft a detailed procedure for allowing public access to the waste registers (chemical & radioactive).	Finance Project Manager	Nov 2022		the production database still requires records to be modified to be completed and final review by FMC & RSO.
Finalised Waste Inventory Database made publicly available	Update and/or complete chemical and radioactive records in the database and publish the records	RSO & FMC Project Manager	31 Mar 2023		Work is ongoing – has stalled a couple of times due to IT issues. Radioactive records 98% complete.
Improvement Objective: To ensure IWDF activities comply with the code of practice for near surface disposal of radioactive waste in Australia. (1992) and with the Code for Disposal Facilities for Solid Radioactive Waste (released October 2018).					
Safety Assessment / Case	Update the Operation Safety Assessment and Safety Case with changes as requested by ARPANSA and agreed by RCWA.	RSO	31 Oct 2022		RCWA agreed that the proposed content for the safety case is in line with requirements of RPS C-3. Waiting on RHU to set activity limits before work can be completed. Draft OSA, PCSA and Safety Case – submitted to RCWA March 2023, to date no response received from RCWA.
ENVIRONMENTAL ACTION PLAN 7- TRANSPORT					
Environmental, Health and Safety, and Quality 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 EHSQMS, 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>
Improvement Objective:					
ENVIRONMENTAL ACTION PLAN 8 – WATER					
Environmental, Health and Safety, and Quality 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 EHSQMS, the 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>
Improvement Objective:					
ENVIRONMENTAL ACTION PLAN 9 – WASTE ACCEPTANCE					
Environmental, Health and Safety, and Quality 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.					
<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>
Improvement Objective: To ensure that there are no inadvertent barriers to appropriate waste being disposed at the IWDF					
ENVIRONMENTAL ACTION PLAN 10 – COMMUNITY LIAISON					
Environmental, Health and Safety, and Quality 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.					
<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>
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					

Improvement Objective: to ensure that the proponent continues to meet the requirements of proponent commitment 7.3.					
ENVIRONMENTAL ACTION PLAN 11 - REVIEW OF MANAGEMENT					
Environmental, Health and Safety, and Quality 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 EHSQMS, the 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: To ensure that the Management Order, Licensing and Registrations and all system procedures are up to date.					
Amended DWER Licence	Prepare DWER Licence renewal with a request to change Condition 2 from 3 months to 28 working days	FMC Project Manager	16 Nov 2021	16 Nov 2021, renewal application submitted to DWER	DWER Licence renewed 16 Aug 2022 this requirement has been modified to "at least 1 month"

Revision	Date	Description	Prepared by:	Checked by:	Approved by:
0.1	03/06/22	Draft – populated with plans as agreed at June 2022 Management Review Meeting	LM	MT	MT
0.2	03/08/22	Plan 6 updated with agreed completion dates resulting from 02/08/22 OEOM	LM	MT	MT
0.3	20/08/22	Plan 11 status update updated	LM	MT	MT
0.4	15/11/22	Review – no changes. For discussion at OEOM as dates for plan 6 are overdue	LM	MT	MT
0.5	13/12/22	Review – update to 'status update'	LM	MT	MT
0.6	27/02/23	Review – Plan 6 Safety Assessment/safety Case updated	LM	MT	MT
0.7	23/05/23	Review – Plan 6 Safety Assessment/safety Case updated	LM	MT	MT

APPENDIX T

2022 – 2023 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.	Finance IWDF Project Manager	Finance Project Manager	Finance Project Manager or Director	Finance 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, RSO	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, RSO, 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

2022 – 2023 Access Road Condition Reports

IWDF MT WALTON EAST ACCESS ROAD
CONDITION REPORT

ODOMETER START 64322
ODOMETER FINISH 64421

DATE 17/5/2023
DRIVER MJS

IWDF-FORM-44

KEY:	Trafficable	T		kms		circle	NOTES*	
	Soft - L Vehicles Only	S		railway 46	54	clay	Ⓟ S U	
	Un-trafficable	U		47	53	sand	Ⓟ S U	
				48	52	sand	Ⓟ S U	
				wash 49	51	gravel	Ⓟ S U	
				50	50	sand	Ⓟ S U	
highway		circle one		51	49	sand	Ⓟ S U	
0	100	sand	Ⓟ S U	52	48	sand	Ⓟ S U	
1	99	sand	Ⓟ S U	53	47	sand	Ⓟ S U	
2	98	sand	Ⓟ S U	54	46	sand	Ⓟ S U	
3	97	sand	Ⓟ S U	55	45	sand	Ⓟ S U	
4	96	sand	Ⓟ S U	56	44	sand	Ⓟ S U	
powerline	95	sand	Ⓟ S U	57	43	sand	Ⓟ S U	
6	94	sand	Ⓟ S U	58	42	sand	Ⓟ S U	
7	93	sand	Ⓟ S U	59	41	sand	Ⓟ S U	
8	92	clay	Ⓟ S U	60	40	clay	Ⓟ S U	
9	91	s + gr	Ⓟ S U	61	39	clay	Ⓟ S U	
10	90	s + gr	Ⓟ S U	floodway	62	38	clay	Ⓟ S U
x-road	89	sand	Ⓟ S U	floodway	63	37	sand	Ⓟ S U
12	88	sand	Ⓟ S U	64	36	sand	Ⓟ S U	
wash	87	gravel	Ⓟ S U	65	35	sand	Ⓟ S U	
wash	86	sand	Ⓟ S U	66	34	sand	Ⓟ S U	
15	85	sand	Ⓟ S U	wash	67	33	sand	Ⓟ S U
16	84	sand	Ⓟ S U	68	32	sand	Ⓟ S U	
17	83	sand	Ⓟ S U	69	31	sand	Ⓟ S U	
wash (2)	82	sand	Ⓟ S U	wash	70	30	sand	Ⓟ S U
19	81	sand	Ⓟ S U	71	29	sand	Ⓟ S U	
20	80	sand	Ⓟ S U	floodway	72	28	clay	Ⓟ S U
21	79	sand	Ⓟ S U	73	27	clay	Ⓟ S U	
floodway	78	sand	Ⓟ S U	74	26	clay	Ⓟ S U	
23	77	sand	Ⓟ S U	wash	75	25	s + gr	Ⓟ S U
24	76	sand	Ⓟ S U	76	24	s + gr	Ⓟ S U	
25	75	sand	Ⓟ S U	77	23	clay	Ⓟ S U	
wash	74	s + gr	Ⓟ S U	wash	78	22	gravel	Ⓟ S U
27	73	sand	Ⓟ S U	79	21	clay	Ⓟ S U	
28	72	sand	Ⓟ S U	80	20	s + gr	Ⓟ S U	
29	71	sand	Ⓟ S U	81	19	s + gr	Ⓟ S U	
30	70	sand	Ⓟ S U	82	18	s + gr	Ⓟ S U	
31	69	sand	Ⓟ S U	83	17	s + gr	Ⓟ S U	
wash	68	sand	Ⓟ S U	84	16	s + gr	Ⓟ S U	
33	67	sand	Ⓟ S U	85	15	s + gr	Ⓟ S U	
34	66	sand	Ⓟ S U	86	14	s + gr	Ⓟ S U	
35	65	sand	Ⓟ S U	87	13	s + gr	Ⓟ S U	
36	64	clay	Ⓟ S U	88	12	s + gr	Ⓟ S U	
wash	63	sand	Ⓟ S U	89	11	s + gr	Ⓟ S U	
38	62	sand	Ⓟ S U	90	10	s + gr	Ⓟ S U	
39	61	sand	Ⓟ S U	wash	91	9	gravel	Ⓟ S U
40	60	sand	Ⓟ S U	92	8	clay	Ⓟ S U	
41	59	sand	Ⓟ S U	wash	93	7	clay	Ⓟ S U
42	58	sand	Ⓟ S U	94	6	s + gr	Ⓟ S U	
wash	57	clay	Ⓟ S U	95	5	sand	Ⓟ S U	
44	56	clay	Ⓟ S U	96	4	s + gr	Ⓟ S U	
wash	55	clay	Ⓟ S U	97	3	s + gr	Ⓟ S U	
railway	54	clay	Ⓟ S U	98	2	s + gr	Ⓟ S U	
47	53	sand	Ⓟ S U	99	1	IWDF	Ⓟ S U	
				100	0	Camp	Ⓟ S U	
*NOTES Water depth, blockage of drains, etc								
Mt Walton East								

IWDF MT WALTON EAST ACCESS ROAD ODOMETER START 10934
 CONDITION REPORT ODOMETER FINISH 11032

DATE 17/10/2022
 DRIVER MJS

IWDF-FORM-44

KEY:	Trafficable	T		kms		kms	circle	NOTES*
	Soft - L Vehicles Only	S		railway	46	54	clay	T S U
	Un-trafficable	U			47	53	sand	T S U
					48	52	sand	T S U
				wash	49	51	gravel	T S U
					50	50	sand	T S U
highway		circle one	NOTES*					
	0	100 sand	T S U		51	49	sand	T S U
	1	99 sand	T S U		52	48	sand	T S U
	2	98 sand	T S U		53	47	sand	T S U
	3	97 sand	T S U		54	46	sand	T S U
	4	96 sand	T S U		55	45	sand	T S U
powerline	5	95 sand	T S U		56	44	sand	T S U
	6	94 sand	T S U		57	43	sand	T S U
	7	93 sand	T S U		58	42	sand	T S U
	8	92 clay	T S U		59	41	sand	T S U
	9	91 s + gr	T S U		60	40	clay	T S U
	10	90 s + gr	T S U		61	39	clay	T S U
x-road	11	89 sand	T S U	floodway	61			
				floodway	62	38	clay	T S U
	12	88 sand	T S U		63	37	sand	T S U
wash	13	87 gravel	T S U		64	36	sand	T S U
wash	14	86 sand	T S U		65	35	sand	T S U
	15	85 sand	T S U		66	34	sand	T S U
	16	84 sand	T S U	wash	67	33	sand	T S U
	17	83 sand	T S U		68	32	sand	T S U
wash (2)	18	82 sand	T S U		69	31	sand	T S U
	19	81 sand	T S U	wash	70	30	sand	T S U
	20	80 sand	T S U		71	29	sand	T S U
	21	79 sand	T S U	floodway	72	28	clay	T S U
floodway	22	78 sand	T S U		73	27	clay	T S U
	23	77 sand	T S U		74	26	clay	T S U
	24	76 sand	T S U	wash	75	25	s + gr	T S U
	25	75 sand	T S U		76	24	s + gr	T S U
wash	26	74 s + gr	T S U		77	23	clay	T S U
	27	73 sand	T S U	wash	78	22	gravel	T S U
	28	72 sand	T S U		79	21	clay	T S U
	29	71 sand	T S U		80	20	s + gr	T S U
	30	70 sand	T S U		81	19	s + gr	T S U
	31	69 sand	T S U		82	18	s + gr	T S U
wash	32	68 sand	T S U		83	17	s + gr	T S U
	33	67 sand	T S U		84	16	s + gr	T S U
	34	66 sand	T S U		85	15	s + gr	T S U
	35	65 sand	T S U		86	14	s + gr	T S U
	36	64 clay	T S U		87	13	s + gr	T S U
wash	37	63 sand	T S U		88	12	s + gr	T S U
	38	62 sand	T S U		89	11	s + gr	T S U
	39	61 sand	T S U		90	10	s + gr	T S U
	40	60 sand	T S U	wash	91	9	gravel	T S U
	41	59 sand	T S U		92	8	clay	T S U
	42	58 sand	T S U	wash	93	7	clay	T S U
wash	43	57 clay	T S U		94	6	s + gr	T S U
	44	56 clay	T S U		95	5	sand	T S U
wash	45	55 clay	T S U		96	4	s + gr	T S U
railway	46	54 clay	T S U		97	3	s + gr	T S U
	47	53 sand	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

APPENDIX V

2022 – 2023 Internal Audit Schedule

**INTERNAL MANAGEMENT AUDIT SCHEDULE
FINANCE-MF-11-1**

X = audit of procedure scheduled (if audit required)

X = Audit of procedure completed

PROCEDURE TO BE AUDITED	REPORTING YEAR: July 2022 – June 2023											
	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23
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	REPORTING YEAR: July 2022 – June 2023											
	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23
MP-11 Management Audits										X		
MP-12 Management Review										X		
MP-13 Control of Non conformances and Corrective and Preventative Action										X		
MP -14 Access Road Management and Traffic Control	Not audited as now outside scope of IWDF											
MANAGEMENT PLANS												
1. Air Quality												X
2. Decommissioning and Rehabilitation												X
3. Emergency Response												X
4. Flora and Fauna												X
5. Health and Safety												X
6. Radiation												X
7. Transport												X
8. Water												X
9. Waste Acceptance												X
10. Community Liaison												X
11. Management Review												X

PROCEDURE TO BE AUDITED	REPORTING YEAR: July 2022 – June 2023											
	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23
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		
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		

PROCEDURE TO BE AUDITED	REPORTING YEAR: July 2022 – June 2023											
	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23
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	
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												

PROCEDURE TO BE AUDITED	REPORTING YEAR: July 2022 – June 2023											
	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23
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 2023 REVISION: 2

APPENDIX W

2022 – 2023 Management Review Meeting Agendas



IWDF MT WALTON EAST MANAGEMENT REVIEW MEETING

AGENDA

Date: Thursday 15 December 2022

Time: 9.15 am – OEOM to be held after the MRM

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 IWDF Waste Inventory Database - Update (SP/LM)

3.2 DWER Licence renewal – update (SN)

3.3 Reporting to RCWA – 2020 – 2021 PCR (SN)

3.4 RCWA feedback on publicly available IWDF Waste Inventory Database spreadsheet

3.5 Legal deposit (LM)

3.6 Finance IWDF website content - status update (SN/)

4. IWDF Management Systems

4.1 Environmental, Health & Safety and Quality Policy review, update, if required, and signoff (LM)

4.2 Management Plans - updates (LM)

4.3 Management Manuals – updates (LM)

4.4 Registers –updates Legal & Other Requirements and Aspects and Impacts registers

4.5 Finance EHSQMS Procedures review, update, and approval (LM)

4.6 FMC EHSQMS & Procedures review, update, and approval (LM)

4.7 Draft PCR July 2021 to June 2022 (LM)

4.8 Annual review of Dept of Finance R&D Schedule (EH/SN)

5. Action Plans

5.1 Performance against 2022 – 2023 Action Plan – status (LM)

6. Compliance Audits

6.1 Ministerial Statement (LM)

6.2 License, Permit and 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 2022 – 2023 audits to date (LM)

8. Electronic Document Library

8.1 Recent updates and changes (LM)

9. Guideline Review and Changes

9.1 Chemical Waste Acceptance Guidelines (LM)

9.2 Radioactive Waste Acceptance Proforma (SP/LM)

10. Monitoring

10.1 Groundwater (twice yearly) (MJS)

10.2 Capping (annual) (MJS)

10.3 Rehabilitation (annual) (MJS)

10.4 Dose constraint monitoring – report on monitoring results to date (SP)

10.5 5-yearly radiation monitoring – reporting (SP)

11. IWDF Infrastructure

11.1 Access Road status report (EH/SN)

11.2 Access Road current condition report (MJS)

11.3 Disposal of old genset – status update (MS/SN)

12 Staff Training Needs

12.1 Training requirements (LM)

13 Radioactive Issues

13.1 IWDF Safety Assessment / Operations Safety Case – status update (SP)

13.2 IWDF Safety Assessment / Post Closure Safety Case – status update (SP)

14 Community Liaison Committee

14.1 CLC visit to the IWDF

14.2 Meeting frequency – submission to EPA to vary frequency status update (EH)

15 FMC Performance

15.1 Performance against FMC 2022 – 2023 estimated costs (MJS)

15.2 FMC performance against Finance contract management plan (SN, EH)

16 Other Business

16.1 Disposal applications – new and updates to existing applications (MS, SP)

17 Next Meeting

To be scheduled for June 2023



IWDF MT WALTON EAST MANAGEMENT REVIEW MEETING

AGENDA

Date: Tuesday 13 June 2023

Time: 9.30 am – OEOM to be held after the MRM

Venue: Board/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 IWDF Waste Inventory Database – status update (LM)
 - 3.2 Legal deposit (LM)
 - 3.3 Finance IWDF website content - status update (EH/SN)
 - 3.4 5-yearly Radiation Monitoring Report submitted to RCWA (EH/SN)
- 4. IWDF Management Systems**
 - 4.1 Environmental, Health & Safety and Quality Policy review, update, if required, and signoff (LM)
 - 4.2 Management Plans - updates (LM)
 - 4.3 Management Manuals – updates (LM)
 - 4.4 Registers –updates Legal & Other Requirements and Aspects and Impacts registers (LM)
 - 4.5 Finance EHSQMS Procedures review, update, and approval (LM)
 - 4.6 FMC EHSQMS & Procedures review, update, and approval (LM)
 - 4.7 Draft PCR July 2021 to June 2022 (LM)
 - 4.8 Draft PCR July 2022 to June 2023 (LM)
 - 4.9 Annual review of Dept of Finance R&D Schedule (EH/SN)
- 5. Action Plans**
 - 5.1 Performance against 2022 – 2023 Action Plan (LM)
 - 5.2 Draft 2023 – 2024 Action Plan (Management Team to provide input during meeting))
- 6. Compliance Audits**
 - 6.1 Ministerial Statement (LM)
 - 6.2 License, Permit and Registration (LM)
 - 6.3 Finance Management System (LM)
 - 6.4 FMC Management System (LM)
 - 6.5 Management Plans - (LM)
 - 6.6 Ongoing Suitability of Management Plans (LM)
 - 6.7 Liaison with National and International Intractable Waste Management Facilities
- 7. Nonconformance and Corrective and Preventative Actions**
 - 7.1 Non-conformances from 2022 – 2023 audits to date (LM)

8. Electronic Document Library

8.1 Recent updates and changes (LM)

9. Guideline Review and Changes

9.1 Chemical Waste Acceptance Guidelines (LM)

9.2 Radioactive Waste Acceptance Proforma (SP/LM)

10. Monitoring

10.1 Groundwater (twice yearly) (MJS)

10.2 Capping (annual) (MJS)

10.3 Rehabilitation (annual) (MJS)

10.4 Dose constraint monitoring – report on monitoring results to date (SP)

11. IWDF Infrastructure

11.1 Access Road management status report (EH/SN)

11.2 Access Road current condition report (MJS)

11.3 Firebreaks (MJS)

11.4 Site Infrastructure maintenance (EH/MJS)

12 Staff Training Needs

12.1 Training requirements (LM)

13 Radioactive Issues

13.1 IWDF Safety Assessment / Operations Safety Case – status update (SP)

13.2 IWDF Safety Assessment / Post Closure Safety Case – status update (SP)

14 Community Liaison Committee

14.1 Meeting frequency – submission to EPA to vary frequency status update (EH)

15 FMC Performance

15.1 Performance against FMC 2022 – 2023 estimated costs (MJS)

15.2 FMC performance against Finance contract management plan (SN/EH)

16 Other Business

16.1 Disposal applications – new and updates to existing applications (MS, SP)

17 Next Meeting

To be scheduled for December 2023

APPENDIX X

2022 – 2023 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

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 Y

Permanent Above Ground Markers

APPENDIX Y

DISPOSAL CELL SURFACE MARKERS



92RS01 and 94RS01



94NRT01



94NRT02



94RT01



96NRT01



97NRT01



97NRT02



98NRT01



98NRT02

2000RT01



2002RT01

2008RT01



2020NRT01