Dixon Sand Pty Ltd

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Response and Action Plan for the Independent Environmental Audit 2022, Old Northern Road Quarry



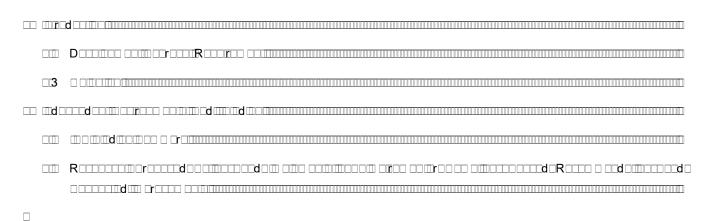
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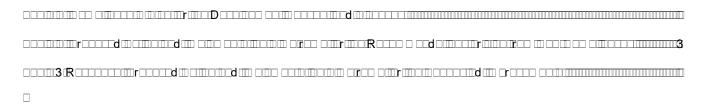
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Table of Contents



Tables



Abbreviations

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1. Introduction

1.1 Development Approval Requirement

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

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

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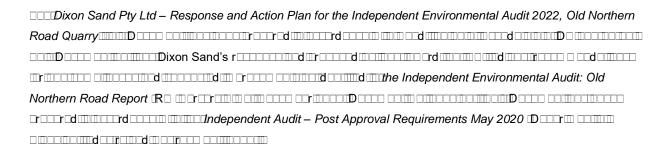
Within 12 weeks of commencing this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the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

1.2 Background Information

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1.3 Objective



2. Independent Environmental Audit Finding

2.1 IEA Finding Summary

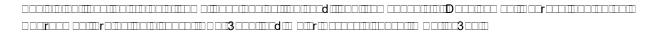


Table 1: Compliance Status for the Development Consent and Licences.

Approval	DA 250-09-01	EPL 3916	WAL 24341
Total			

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



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

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
- R - R - R - R - R - R - R - R - R - R		Three random examples of Daily Plant Inspection Lists were inspected (51428, 51653 and 51903) and each list was found to contain insufficient or clearly wrong information or insufficient information about which Quarry the equipment was located. Attention to detail on all documentation within the Quarry is fundamental to accurately recording information required regarding quarry operations.	Proposed Action: Output Down Control
Romoo		The current Site Traffic Management Plan contains a range of requirements for truck drivers travelling to and from the Old Northern Road Quarry. Some of the requirements are outdated and no longer relevant This is an important document given it is to be cross-referenced in the Driver's Code of Conduct (see Suggested Improvement ONR I2/22).	Proposed Action: room Manage and revised accordingly. Implementation Timeframe: room Manage and revised accordingly. Implementation Timeframe: room Manage and revised accordingly. Implementation Timeframe: room Manage and Ma
- R- R3			Proposed Action: October 1987 Company Com

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
		The current practice to control the total number of trucks entering and leaving the Quarry between 5:45am and 7:00am is reliant upon preventing no more than 20 laden trucks to leave the weighbridge before 7am. This approach assumes only 20 trucks enter during this period. At present, uncertainty exists about the number of unladen trucks that enter the Quarry during this period. Hence, it is important that the new software system accounts for both unladen vehicles entering and laden trucks leaving the Quarry during this period. The new program would also record the number of laden trucks entering and leaving the Quarry at other times of day, i.e. in accordance with Condition 3(21).	Implementation Timeframe: 3000007000030 000000000000000000000000
ROMOO		Areas were observed where runoff from the upper surface of the western wall of the Twin Dams had flowed to the west and over the steep slopes on the western side of the Twin Dams and adjoining current overburden stockpile area. In one area, considerable erosion had occurred with runoff potentially being able to flow beyond the western boundary of the Quarry (Photo 13).	Proposed Action: Oddingorrow of the control of the
O ORO ROMOO		The surveyed star posts observed on the eastern boundary of Stage 5 within Lot 1 DP 547255 are steel grey in colour and not readily detected, particularly	Proposed Action: Ornord Control Contr

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
- R- R		doomdd doordd do	Proposed Action:
0 0 R 0 R 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		Uncertainty existed on site during the audit site inspection regarding how various products were filed within the register. Arrangement of the register by both product type and manufacturer should assist any person to quickly locate	Proposed Action: ODD GOOD TO GOOD CONTROLL CONT
ROMOO		This modified procedure is recommended in response to the measured noise exceedances recorded in December 2019 and June 2021. Gaining an appreciation of the implications upon the total noise generated prior to the introduction of the new equipment or procedures would assist to identify if additional controls are needed or the use of certain equipment needs to be december 2019.	Proposed Action: derestation of the content of the

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
0 0 R 0 R 0 M 0 0 0 0 0 0 0 0 0 0 0 0 0		Dixon Sand has submitted all required information regarding the Positive Public Covenant to DPE and awaits the Department's response in order for this matter to be finalised.	Proposed Action: Disconding to the control of the
Roomo		No record of strategies, plans and programs having been reviewed within three months following the submission of incident reports were maintained during the audit period. Additionally, DPE was not notified in writing that a review of strategies, plans and programs had been undertaken within 3 months following the submission of an incident report. The period between the identification of an uncontrolled discharge event and notification of the incident to DPE and the EPA exceeded the specified 7-day notification period and 14-day reporting	Proposed Action: Octor room of the Resonant contract of the Resonant c
Roomo	3 🖽 3 🖽		Proposed Action: Description of the contract

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
		The reported uncontrolled discharge of water at Monitoring Point 1 on 16 June 2020 did not include any water quality data, which is a requirement of the EPA □□d□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□	Implementation Timeframe:
RODU		Not all affected landowners were notified regarding the results of noise	Proposed Action: Disconded acti

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

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
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0 0 R	Company and new employee. □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□	Proposed Action: Documents referred to in the Driver's Code of Conduct will be reviewed and remark

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
- R.3	Most of the documentation sighted during the audit didn't include sufficient document control information to assist in locating the document on the Company's server, whether it is the current version and when it should be reviewed. The progressive introduction of document control will assist in improved management of documentation on site. It is important to clarify differences for documentation for either Old Northern Road Quarry or Haerses Road Quarry.	Proposed Action: Common of the common of
	The current Monthly Site Condition Check List should be reviewed to ensure it captures all key operational management commitments documented in the Quarry's Development Consent, Environment Protection Licence and Management Plans. The current Monthly Site Condition Check List appears comprehensive – not withstanding this, it is preferable that all commitments for the Quarry are captured. It is noted that not all commitments would need to be assessment monthly.	
- R	Currently there is no Re-induction Program on site with reliance placed upon relevant environmental practices being raised at Toolbox Meetings. Whilst this practice is commendable, a Re-induction Program would provide a more formal approach to ensure that all existing and recently required practices are fully understood by on-site personnel.	Proposed Action: One or company to the company to

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
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	A JSEA would ensure that all relevant environmental issues/documentation is addressed and consolidated in a structured manner before a new task or project is commenced. Issues to be addressed could include completion of a preclearance form, notifications to nearby neighbours, pre-operations photography, supply of relevant waste containers for solid/liquid wastes, placement of silt-stop fencing, adequate water for dust controls, are any noise mitigation measures needed or notifications to adjoining landowners?	Proposed Action: Out orranged recommended and out of the commended and
0 R	All publicly available documents placed on the Company's website should round disconnection. At present, all documents placed on the Company's website do not include the requested direct links which makes reviewing documents/search for information more difficult.	Proposed Action: Outroom do on