

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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# 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.*

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## 1.2 Background Information

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*Independent Environmental Audit: Old Northern Road Report* ... ..  
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### 1.3 Objective

Dixon Sand Pty Ltd – Response and Action Plan for the Independent Environmental Audit 2022, Old Northern Road Quarry... Dixon Sand's r... the Independent Environmental Audit: Old Northern Road Report R... Independent Audit – Post Approval Requirements May 2020

## 2. Independent Environmental Audit Finding

### 2.1 IEA Finding Summary

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

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

| Approval     | DA 250-09-01 | EPL 3916 | WAL 24341 |
|--------------|--------------|----------|-----------|
|              |              |          |           |
|              |              |          |           |
|              |              |          |           |
| <b>Total</b> |              |          |           |

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

... 3 ...

**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  |
|----------------------|---|---|---|
| <p>RCR<br/>R1000</p> | <p>1</p>  | <p>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.</p> | <p><b>Proposed Action:</b></p> <p>Dixon Sand will ensure that all equipment inspection lists are accurate and up-to-date.</p> <p><b>Implementation Timeframe:</b></p> <p>3 months</p> |
| <p>RCR<br/>R1000</p> | <p>1</p>  | <p>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).</p>  | <p><b>Proposed Action:</b></p> <p>The Driver's Code of Conduct will be reviewed and revised accordingly.</p> <p><b>Implementation Timeframe:</b></p> <p>3 months</p>                  |
| <p>RCR<br/>R3000</p> | <p>3</p>  | <p>Dixon Sand will ensure that all equipment inspection lists are accurate and up-to-date.</p>  | <p><b>Proposed Action:</b></p> <p>Dixon Sand will ensure that all equipment inspection lists are accurate and up-to-date.</p>   |

| ID     | Consent Condition(s) relevant to Non-Compliance | IEA Comments and Recommended Action  | Proposed Action and Implementation Timeframe by Dixon Sand          |
|--------|---|--|---|
|        |   | <p>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).</p> | <p>Implementation Timeframe:<br/> 3<br/> D<br/> </p>                |
| R<br>R |   | <p>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).</p>   | <p>Proposed Action:<br/> Implementation Timeframe:<br/> 3<br/> </p> |
| R<br>R |   | <p>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</p>  | <p>Proposed Action:<br/> Implementation Timeframe:</p>              |



| ID                       | Consent Condition(s) relevant to Non-Compliance | IEA Comments and Recommended Action   | Proposed Action and Implementation Timeframe by Dixon Sand                                 |
|--------------------------|---|---|--|
|                          |   |   | 3M<br>3M   |
| R000000000<br>R000000000 | 3M  | <p>The monument on Monitoring Well MW2 on the eastern side of Lot 1 DP 547255 was observed to be without any external identification.</p>   | <p><b>Proposed Action:</b></p> <p>3M</p> <p><b>Implementation Timeframe:</b></p> <p>3M</p> |
| R000000000<br>R000000000 | 3M  | <p>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</p>   | <p><b>Proposed Action:</b></p> <p>3M</p> <p><b>Implementation Timeframe:</b></p> <p>3M</p> |
| R000000000<br>R000000000 | 3M<br>3M  | <p>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</p> | <p><b>Proposed Action:</b></p> <p>3M</p> <p><b>Implementation Timeframe:</b></p> <p>3M</p> |





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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  |
|------------|--|---|
| <p>□ R</p> | <p>Current Position Statements simply state the title of the position without documenting the required work tasks and the employee’s responsibilities for safety and environmental matters that are specific to their position. Where appropriate, the environmental matters should be cross-referenced to the relevant Development Consent conditions, Management Plan(s) or site-based operational procedures. These matters need to be discussed during an induction with a copy of the entire statement (signed) held by both the Company and new employee.</p>  | <p><b>Proposed Action:</b></p> <p>Implementation Timeframe:</p> <p>3</p>  |
| <p>□ R</p> | <p>documentation referred to in the Driver’s Code of Conduct should be</p> <ul style="list-style-type: none"> <li>the Maroota Local Traffic Management Policy;</li> <li>the Site Induction for Drivers; and</li> <li>the Site Traffic Control Plan.</li> </ul> <p>A copy of the Code should be signed by a representative of the Company and the nominated driver, with a copy of the Code and all attachments held by both the Company and the driver. Ideally, re-inductions should occur annually to ensure any adjustments to the Code are brought to the attention of all drivers. Section 4 of the TMP, and the Table of Contents of the TMP, should be updated to correctly identify appendices which form part of the Code. The current version of the Site Induction for Drivers is outdated and requires review and improvement. It is important that all drivers sign a copy of the Site Induction and are given a full set of all documents. The importance of annual re-inductions cannot be over-emphasised.</p> | <p><b>Proposed Action:</b></p> <p>Documents referred to in the Driver’s Code of Conduct will be reviewed and</p> <p><b>Implementation Timeframe:</b></p> <p>The Driver’s Code of Conduct and associated documentation will be reviewed</p> <p>3</p> |

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| ID     | IEA Comments and Suggested Improvement  | Proposed Action and Implementation Timeframe by Dixon Sand  |
|--------|---|---|
|        |   | XXX<br>XXXXX  |
| XXXXXX | <p>XXX</p> <p><i>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?</i></p> | <p><b>Proposed Action:</b></p> <p>XXX</p> <p><b>Implementation Timeframe:</b></p> <p>3XXXXXXXXXXXX3X</p>      |
| XXXXXX | <p>All publicly available documents placed on the Company’s website shouldXXXXXXXXXXXXXXXXXXXX</p> <p><i>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.</i></p>   | <p><b>Proposed Action:</b></p> <p>XXX</p> <p><b>Implementation Timeframe:</b></p> <p>XXXXXXXXXXXXXXXXXXXX</p> |

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