

Table 8-1 - Non-Compliant and Not Verified Conditions – MCoA 11\_0094 and Statement of Commitments

Condition Number	Condition	Comments and Evidence Sighted for Audit Period	Compliance Status (C/O/NC/NA) and Recommendation	Actions
Sch 3 Condition 7	Within 12 months from the date of this approval, or as otherwise agreed by the Director-General, the Proponent shall surrender the development consents identified in Table 1 in accordance with Section 75YA and 104A of the EP&A Act	At the time of the audit site inspections, WCC could not demonstrate that they had surrendered the previous development consents. On 29 March 2018, WCC provided documents showing that WCC surrendered all of the leases detailed in Table 1 on the leases on 13 March 2018, except for DA 1996/8256 and DA-1996/6256. The surrender of leases followed an application to surrender the leases dated 7 February 2018. On the basis that the Development Consents were not surrendered within 12 months of the date of the Approval (being 3 April 2013); and that surrender of two development consents may be outstanding; WCC is considered non-compliant with this condition.	Non-Compliant  <b>Recommendation:</b> Ensure that development consents DA 1996/8256 and DA-1996/6256 are surrendered in accordance with Condition 7: Schedule 3.	All of the relevant DA consents have been surrendered by the 27th March 2018.
Sch 4 Condition 9	The Proponent shall: a) implement suitable measures to prevent the unnecessary proliferation of litter both on and off-site, including the installation and maintenance of a mesh fence of not less than 1.8 metres high around the site; and b) inspect daily and clear the site (and if necessary, surrounding area) of litter on at least a weekly basis.	Fencing was installed around the boundary of the landfill. Cleaning of litter around the perimeter was reported to be conducted by WCC on a campaign basis at least weekly. WCC reported that daily inspections are carried out that includes litter inspections. A template form including the item "workplace free of litter and obstructions" was sighted.  During the site inspection significant quantities of litter was observed across the site, generally caught in obstructions such as shrubs, trees and fences and also in and around landfill areas. Off site areas were not accessible to inspect.  Minutes of the 2017 Whytes Gully reference group (22 November 2017) indicated that residents advised <i>"that there is a lot of rubbish around, in particular in Reddalls Road, from the corner of the tip to the car yard. One member also mentioned that the area near where he lives there are plastic bags up in the trees."</i> On the basis of site observations during both site inspections, and the feedback from community representatives at the November Whytes Gully reference group, that WCC are not compliant with this condition and that there is significant opportunity to reduce the amount and extent of litter at the site (and off site) through better controls or through more frequent litter reduction campaigns.  It is noted that the condition requirement to "clear the site" of litter is very challenging given the extent of plastic bags etc. disposed of at the landfill on a daily basis	Non-compliant  <b>Recommendation:</b> Increase the effectiveness of litter reduction controls and of litter reduction campaigns to reduce on and off site litter.  OFI: Reconsider with DPE what would be acceptable in terms of "clear the site of litter" so as to be able to comply with this condition	Council conducts most of the litter removal at the site via intensive campaigns at least weekly. There is a dedicated crew on site at least once a week performing litter reduction. This non compliance is based on technical wording associated with "clear the site of litter". The auditor has advised that even one piece of litter under this wording renders Council non-compliant. Council does not agree with this interpretation and feels that if the intent was that no single piece of litter should be identified at an time on site, than the consent wording would be that specific.  Agreed: Council are looking at ways to safely capture of the windblown litter with new designed litter fences and also additional litter reduction staff.
Sch 4 Condition 14	The Proponent shall ensure that all licensed surface water discharges from the site comply with the discharge limits (volume and quality) set for the project in any EPL or relevant provisions of the POEO Act	As noted in the annual report 2016-2017, surface water that exited the site in June 2016 and July 2016 contained suspended solids at levels above the 50mg/L concentration limit prescribed in the sites Environment Protection Licence.  Downstream samples taken at the same time indicated suspended solids <50mg/L concentration limit and it was reported by WCC that there was no material harm caused by the non-compliance (as defined by Section 147 of the POEO Act 1997).  To help reduce the likelihood of future non-compliances, a Wet Weather and Stormwater Management work instruction was created in July 2016 and implemented to ensure that the sediment pond capacity is maintained between rainfall events.	Non-compliant  <b>Recommendation:</b> Continue to review the effectiveness of corrective actions applied to site water management and address any further non compliances as required	This non compliance has been reported to the EPA and additional processes and procedures have been placed around the sites storm water management and reviewed after each event.  This non-compliance is a replication of a historic EPL non compliance and has since been managed to the satisfaction of the EPA.  This condition is a replication of EPL conditions.

Independent Environmental Audit (IEA) Whytes Gully Landfill Extension Project  
(MCW Environmental Consulting Pty Ltd - March 2018) - ACTIONS

Condition Number	Condition	Comments and Evidence Sighted for Audit Period	Compliance Status (C/O/NC/NA) and Recommendation	Actions
Sch 4 Condition 18e	<p>The Proponent shall prepare and implement a Soil, Water and Leachate Management Plan for the project in consultation with Council, NOW and the EPA and to the satisfaction of the Director-General. This plan must be prepared and implemented by a suitably qualified and experienced person and be approved by the Director-General prior to the commencement of operation. The plan must include:</p> <p>e) an on-going surface water, groundwater and leachate monitoring program that includes (but is not limited to):</p> <p>a commitment to provide the results of monitoring to NOW and other relevant government agencies every 12 months</p>	<p>Since the implementation of the new work instruction, no further sediment rich discharges have occurred. Council consider that these are historic results and that Council has implemented amended controls to eliminate recurrence, noting that controls implemented are performing as designed. Though the above situation has been reported by WCC through the EPL Annual Report for 2016-2017, the exceedance of suspended solids above the discharge limit is noted as non-compliant to this condition.</p> <p>WCC did not provide evidence that results of monitoring are reported to NOW and other relevant government agencies every 12 months, hence compliance with this aspect of the condition was not Verified</p>	<p>Not Verified</p> <p>Recommendation: Provide results of monitoring to Crown Lands and Water (formerly NOW) and other relevant government agencies every 12 months as required of the condition.</p>	<p>Council would like discuss with DoP what Government agencies would like data from the site as well as what data they would require.</p>
Sch 4 Condition 23	<p>The Proponent shall ensure the project does not cause or permit the emission of any offensive odour (as defined by the POEO Act).</p>	<p>No offensive odour was noted at the time of the first site inspection during calm, and sunny conditions. A deodoriser was observed to be in operation during the first site visit. However, during the second site visit, some odour was observed up slope of the tipping face on the high point of the landfill, which was downwind at the time of the inspection. The odouriser was not in operation during the second site visit. There did not appear to be a process for specific management of the face during these more adverse wind conditions.  It was noted that the tipping face was being kept small and cover was being used during both site inspections.</p> <p>Minutes of the Whytes Gully Reference Group meeting on 24 May 2017 indicated that one member "mentioned the smell in the morning when the lids are lifted. It was advised that the deodoriser trailer is turned on prior to site start up to minimise odour generated. Another member mentioned that sometimes the smell is as late as 10:00am." No mention of odour was made in the Minutes of the Whytes Gully Reference Group meeting on 22 November 2017. Selected incident reports were provided by WCC for odour complaints on 24 November 2016 (1 complaint); 6 March 2017 (4 complaints); and 17 March 2017 (4 complaints). The reports showed that complaints are followed up with weather data and other factors documented. The EPA issued a letter to WCC dated 30 March 2017 responding to a letter from WCC dated 21 March 2017 in relation to odour complaints made in March 2017. The EPA noted that the identified the cause of the complaints relates to a premises not under the control of WCC. Given the audit site inspections were of limited duration, it was not possible to fully assess compliance with this condition and hence is considered Not Verified.</p>	<p>Not Verified</p> <p><b>Recommendation:</b> WCC to ensure that odouriser is in operation as required to minimise the risk of offensive odour going off site. It is recommended that WCC review the implementation of the procedure regarding the use and placement of the odouriser. <b>Recommendation:</b> It is recommended that WCC conduct additional odour monitoring to re-assess the potential for odours during southerly winds and assess if existing controls are adequate to prevent off site odours. Based on the outcomes of the monitoring, additional controls may be warranted.</p>	<p>Council conducts odour monitoring daily and upon the opening of the site as well as regular use of an odour abatement system (deodoriser).  Council will undertake an additional odour monitoring trial, specifically southerly winds to see if there are any extra odours generated. This will be reported in the next report.</p>
Sch 4 Condition 36	<p>The Proponent shall ensure that</p>	<p>No queuing of vehicles noted during the site audit, however it was indicated that some waste trucks are likely to queue on the road outside the facility before 7:30 am waiting for the site and weighbridge to be opened. Due to the extra lane on the road adjacent to the entrance to the facility, trucks are able to queue and not obstruct local traffic.</p>	<p>Not Verified</p>	

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	c) the project does not result in any vehicles queuing on the public road network;	During operating hours, there is room for vehicles to queue on site prior to having to stop.	<b>Recommendation:</b> That WCC manage the road in accordance with the condition. Alternatively, confirm with RMS that current arrangements related to trucks parking outside the facility prior to opening is acceptable, and notify DPE of the outcomes of this consultation	Council to issue instruction to customers (operational) and contractors (construction) not to arrive at the site prior to site opening hours.
	d) heavy vehicles and bins associated with the project do not park or stand on local roads or footpaths in the vicinity of the site;	Consultation with RMS did not identify any traffic related issues relating to WCC Operations in this location.		
	e) all vehicles are wholly contained on site before being required to stop;	Auditors did not observe trucks queuing on public roads, and hence were unable to verify from observation the extent and nature of queuing on public roads. Hence auditors were not able to verify if WCC are not compliant with sub conditions c, d and e.		
Sch 4 Condition 45	The Proponent shall:	During the site inspections, numerous weeds including noxious weeds were evident across the site. Current weed controls appeared limited and was not able to be explained in detail by WCC. Based on site observations, weed controls measures across the site were not adequate or effective.	Non-compliant	Council notes compliance with pest species management and the auditors opinion that noxious weed control should be improved.
	a) implement suitable measures to manage pests, vermin and declared noxious weeds on site; and	WCC reported that the site is inspected monthly and control undertaken periodically derived from inspection results. Implementation records provided included: 1) a schedule of weed management visits for all of council's sites. This indicated site visits on 7 occasions were scheduled over 2017; 2) emails discussing various weed areas and requesting weed control services during 2016 and 2017;	<b>Recommendation:</b> Implement the controls in the program as defined by Biosis for pest, vermin and noxious weeds management.	Council has a weed crew regularly visit the site to remove and position non native vegetation. Council will continue to implement an improved noxious weed control measures as recommended.
	b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in surrounding area.	WCC did not demonstrate that a systematic and through approach is taken to management and control of weeds at the site.		Council notes that the referenced Biosis report is a document that was created as a specification for contract weed control. Council believes that this document is auxiliary to this audit as the implementation of day labor vs contract staff and their relative effectiveness is not in the audit scope.
	Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993	Biosis Pty Ltd was commissioned by Wollongong City Council to review the existing Whytes Gully New Landfill Cell Vegetation Management Plan (VMP), prepared by Biosis (2013). A field investigation was undertaken on 20 June 2017 by Botanist, Bianca Klein. This report details the results of the field investigation, including vegetation condition assessments and provides recommendations for management of the VMP site. Management actions have been formulated based on the requirement for each management zone, as outlined in Biosis (2013), to satisfy the condition criteria outlined in the VMP to date. These management actions are proposed to be undertaken within a 12-month period, with consideration to the current condition of the site and the ongoing viability of the site during and after the VMP works. WCC provided a screen shot of records for Wild Dear Operation - Feral Animal Control - Whytes Gully with latest record dated 24, 25, 26 October 2017.  Given the extent of weeds across the site, WCC are considered not compliant with this condition. Implementation of the control measures defined by Biosis will go towards addressing compliance issues with this condition.		
Sch 4 Condition 49	The Proponent shall prepare and implement a Vegetation Management Plan for the project to the satisfaction of the Director-General.	Implementation:  Based on the issues related to weeds identified above in Condition 45; and outcomes of the Biosis report where more stringent weed actions are defined to be required, WCC are considered to be Non Compliant with the implementation of the weed controls measures identified in the Vegetation Management Plan.	Non-compliant  (Implementation)	Council has a weed crew regularly visit the site to remove and position non native vegetation. Council will implement and improve the Vegetation Management Plan in full and report back in the next report.

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			<p><b>Recommendation:</b> It is recommended WCC implement weed controls as defined in the Vegetation Management Plan.</p> <p><b>Recommendation:</b> That WCC complete the implementation of the Vegetation Management Plan in full (in addition to weed management as defined above) and in regard to Offsets as detailed in the Vegetation Management Plan.</p> <p><b>Recommendation:</b> Report progress in implementation of the VMP in Annual Environmental Reports.</p>	
Sch 5 Condition 3h	Prior to the commencement of operation, the Proponent shall update the draft Landfill Environmental Management Plan in the EA for the site to the satisfaction of the Director-General. This plan must: h) be placed on Council's website within 2 weeks of its approval.	At the time of the audit site inspections (hence for the audit period), the Draft LEMP was posted in DPE website, and the final LEMP was not posted on the WCC website, hence at the time of the audit WCC were not compliant with this condition. As of 26 February, the Final LEMP was located on the WCC website.	Non-Compliant	The LEMP has been listed on the Wollongong Council Website.
Sch 5 Condition 4	The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: a protocol for periodic review of the plan.	The requirement for periodic review is documented in the LEMP and CEMPF.  Based on discussions with WCC, annual reviews of the LEMP and CEMPF were not conducted. The latest version of the LEMP and CEMPF were dated 2014.  Following issue of the Draft Report, WCC indicated that they consider completing the checklist provided in Section G of the EPL Annual Return as a review of the adequacy of the LEMP and CEMPF.	Non-compliant  Recommendation: Implement a formal review process for the LEMP and CEMPF. Where relevant and based on the findings of the review, update the LEMP.	Council have implemented a Formal management review to take place prior to the Issue of the Annual Environmental Report.
Sch 5 Condition 5	One year after the commencement of operation, and annually thereafter, the Proponent shall review the environmental performance of the Project to the satisfaction of the Director-General. This review must: a) describe the operations that were carried out in the past calendar year;  b) analyse the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the  - relevant statutory requirements, limits or performance measures/criteria;  - monitoring results of previous years; and  - relevant predictions in the EA;  c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	WCC provided Annual Reports that incorporate Annual Returns required under the Environmental Protection Licence for the years 2012-2013 to 2016-2017.  The objective of the Annual Report is stated as being required under Condition R1.8 of the EPL which specifies that WCC must provide an Annual Report to accompany the Annual return for the site.  The objective does not appear to reflect the requirements of this condition with thin the Project Approval.  The Annual Report address some of the requirements of the condition, however, these reports do not consider compliance with the Project Approval nor meet all aspects of this condition. Specifically, the reports do not cover the following aspects of the condition:  - 5a) describe the operations that were carried out in the last year;  - 5b) third bullet point: Provide a comparison of results against the relevant predictions in the EA; or  - 5c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; In summary, WCC are compliant with many aspects of the condition, however, the scope of current reports do not address some aspects of the condition.	Non-compliant  <b>Recommendation:</b> It is recommended WCC increase the scope of the Annual Reports to address all of the requirements of Condition 5 (Schedule 5) specific to the Project Approval.	Council has amended the scope for the Annual report to address all concerns in Schedule 5.
Sch 5 Condition 9	Within a year of the commencement of operation of the project, and every 5 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the Project.	This audit is the first audit to be commissioned by WCC since Approval for the Project and since Stage 1 operation of new cell commencing in 2014. To comply with this condition an audit was required in 2015.  An independent environmental audit was not conducted a year after commencement of operation of Stage 1, hence WCC are non compliant with the timing related to this condition.	Non-compliant	Noted.

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Condition Number	Condition	Comments and Evidence Sighted for Audit Period	Compliance Status (C/O/NC/NA) and Recommendation	Actions
Sch 5 Condition 11	From the commencement of construction of the project, the Proponent shall make the following information publicly available on its (Council's) website as it is progressively required by the approval:  c) a copy of the current plans and programs required under this approval;  a complaints register, which is to be updated on a monthly	The LEMP and CEMPF were not posted on the WCC website at the time of the site inspections and hence WCC are considered as non compliant with this condition. As of 26 February, the documents were sighted on the website.  All complaints are logged into Councils Customer Request Management System 'Pathways'. Complaints are reported to the community via the annual returns which are published on our website. WCC do not have a register of all complaints posted on the WCC website as required of the Condition. WCC have a complaints form in the LEMP, however, evidence of the use of this form was not provided by WCC and an Environmental Incident Report form was sighted for complaints.	Non-compliant  <b>Recommendation:</b> It is recommended that a register of complaints, updated monthly, is provided on the WCC website.  <b>OFI:</b> Update the LEMP with the form being used by WCC for the recording of complaints.	Council has listed the LEMP and CEMPF on the Wollongong Council website.  A register of complaints has been listed on the website and is updated monthly.
Statement of Commitment	If the Project is approved, it is proposed that Wollongong City Council would surrender existing development consents of relevance to the Project site.  This does not include the existing development consent for the MRF, which is not affected by the Project	Refer to Schedule 3; Condition 7.	Non-compliant	All of the relevant DA consents have been surrendered by the 27th March 2018.  This appears to be a duplicated non-compliance with Sch3 Con7
Statement of Commitment	Wollongong City Council commit to:  Screen planting with dense tall tree planting on natural ground would be used to block views to the site, particularly from adjoining residences.	Landscape strategy is documented in the LEMP.  Section 4 of the Landscape Strategy states that "the proposed planting along sections of the site boundary is intended to provide visual screening of the landfill operations from adjoining properties. In order to fulfil this function, the planting will need to be carried out in advance of landfill operations. A minimum of 5 years growth will be required to provide the intended visual screening.  WCC did not provide evidence of where trees have been planted for screening purposes.  Minutes of the Whytes Gully Reference Group meetings on 24 May and 22 November 2017 indicated questions from members as to why screening trees had not been planted at the boundary of the site.	Non-compliant  <b>Recommendation:</b> WCC to conduct screen planting with dense tall tree planting on natural ground to block views to the site, particularly from adjoining residences.	The consent operations have not yet moved in the area that has designated screen planting. The existing operational area does not impact the proposed screen planting location.  The intent of the screen planting is to screen views when the operational area moves west towards the adjoining property and towards the proposed planting area.  Council to expedite screen planting.

Table 8-2 - Non-Compliant and Not Verified Conditions - Environmental Protection Licence 5862

L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Based on the monthly reports posted in WCC council and annual returns to EPA, there were 3 occurrences of non-compliances reported to EPA since 2013 against this condition.  <ul style="list-style-type: none"> <li>L2.1/L2.4 - Exceed TSS Concentration Limit at LDP1 (x1, minor) after heavy rainfall event on 25/08/2015 (approximately 150mm over 24hours). Action taken by licensee. EPA has written to licensee regarding non-compliance and relevant action. (1 occurrence);</li> <li>L2.1/L2.4 - Exceed limit for TSS at LDP 1 (minor) on 2 occasions due to high intensity rainfall events in June and July 2016. The licensee is addressing non-compliances. EPA has written to licensee regarding non-compliance and relevant action. (2 occurrences).</li> </ul> <p>Review of water quality monitoring spreadsheets provided by WCC also indicated exceedences of the criteria at LDP1 on 2 occasions in August 2014; and one occasion in March 2016. WCC consider these are historic results and that it has implemented amended controls to eliminate recurrence. WCC consider that controls implemented are performing as designed.</p> <p>Specifically, a Wet Weather and Stormwater Management Work instruction was created in July 2016 and implemented to ensure that the sediment pond capacity is maintained between rainfall events.</p>	Non-compliant  <b>Recommendation:</b> It is recommended that WCC continue to monitor the effectiveness of the controls defined in the Wet Weather and Stormwater Management work instruction and implement additional mitigation measures as required.	This non compliance has been reported to the EPA and additional processes and procedures have been placed around the sites storm water management and reviewed after each event.  This non-compliance is a replication of a historic EPL non compliance and has since been managed to the satisfaction of the EPA.  This consent condition is a replication of EPL conditions.
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		<p>Since the implementation of the new work instruction, there were no further reported elevated TSS discharges. There was no reported exceedance to the water/land concentration limits since July 2016. Based on the exceedences of the criteria as reported, WCC is assessed as Non compliant with this condition.</p> <p>Review of water quality monitoring spreadsheets provided by WCC also indicated exceedences of the criteria at LDP1 on 2 occasions in August 2014; and one occasion in March 2016. It was not evident that these events were reported to the EPA based on documents sighted.</p>		
L4.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	Refer to Sch 4 Condition 23.	Not Verified	
			Refer to recommendations made in the MCoA Checklist for Conditions 23 and 26; Schedule 4.	
O6.8	The licensee must not exhume any landfilled waste unless approved in writing by the EPA.	<p>The process of exhumation of the landfill is defined in the LEMP.</p> <p>Two-2 Penalty Notices (1521880 and 1521881) were raised on 22 May 2014 regarding exhumation of waste:</p> <p>o O6.4 -Non-compliance with Condition O6.4 - The licensee must not exhume any landfilled waste unless approved in writing by the EPA. Penalty Notice issued.</p> <p>WCC consider this to be an historic incident for which Council has implemented amended controls to eliminate recurrence. Controls implemented are performing as designed.</p> <p>WCC has not exhumed any landfilled waste unless approved in writing by the EPA since this event in 2014. An approval for exhumation of waste for the removal of rainflap was granted in October 2017.</p> <p>Given the events in 2014, WCC were not compliant with this condition at this time. Since May 2014 it is considered that WCC has been compliant with the condition hence no recommendation is made.</p>	Non-compliant	<p>This non compliance has been reported to the EPA and additional processes and procedures have been placed around the the area of waste exhumation. Since 2014 this has not occurred since.</p> <p>This non-compliance is a replication of a historic EPL non compliance and has since been managed to the satisfaction of the EPA.</p> <p>This consent condition is a replication of EPL conditions.</p>
O7.3	Disturbed areas must be provided with separate water quality controls for the treatment of runoff containing suspended or turbid pollutants.	<p>During the audit inspections, it was observed that generally disturbed areas within the operation facilities were spray grassed or covered with geofabric. Swales or drainage were generally lined with gravel, and sand bags or check dams were also place within the swales.</p> <p>However, limited erosion and sedimentation controls were noted within the construction areas of cells 2 and 3 and at the newly constructed leachate pond (see photos below). The lack of controls in these areas was reported by WCC to have been from recent construction activities conducted in and adjacent to the drainage line.</p> <p>Issues on this area were also noted in the Whytes Gully Inspection November 2017 Report prepared by the WCC surveillance officer from the public works division.</p> <p>Photo below was taken at the outlet of stormwater swale from the construction of Cell 2 &amp; 3. Note that there was no sediment control prior to the entry to the culvert.</p> <p>WCC noted that since the site inspection, it has and continues to address these issues with the construction contractor on the site. A stop work order was issued in October 2017 and rectification implemented before work could recommence. <u>Performance management of the contractor is ongoing.</u></p>	Non-compliant	<p><b>Recommendation:</b> That WCC and its contractors review the processes for installation of ERSED controls in construction areas and ensure that controls are effective and placed promptly after works are completed.</p> <p>Council has been working closely with the construction team to ensure that the ERSED controls are adequate. The ERSED controls discuss exist internal to the site. Councils discharge of stormwater has not been over the EPL limit.</p>
R4.1	<p>The licensee must maintain a daily log and record the following data of fires at the site:</p> <p>a) Time and date when the fire was deliberately started or reported.</p> <p>b) Whether the fire was authorised by the licensee, and, if not, the circumstances which ignited the fire.</p>	<p>Two fires were recorded in the WHS records management system. Register of events were provided for WGRRP from 2013 to 2017.</p> <p>The fires occurred on 31-7-2013 and 21-8-2013. The system did not report fires after this event. The system indicated that the first fire was reported to the EPA, and a separate email indicated that the second fire was also reported to the EPA.</p> <p>The data provided to auditors did not address all of the requirements of the conditions a to h. As such, Auditors were not able to verify compliance with this condition.</p>	Not Verified	<p><b>Recommendation:</b> It is recommended that WCC record all details as defined in the condition relating to fires at the site and ensure that the EPA are notified of details of fires occurring on site as defined in the condition.</p> <p>Council has reviewed the incident form for fires and has will make amendments to expressively ensure all individual conditions are included in the report template.</p>

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	<ul style="list-style-type: none"> <li>c) The time and date that the fire ceased and whether it burnt out or was extinguished.</li> <li>d) The location of fire (eg. clean timber stockpile, putrescible garbage cell, etc).</li> <li>e) Prevailing weather conditions.</li> <li>f) Observations made in regard to smoke direction and dispersion.</li> <li>g) The amount of waste that was combusted by the fire.</li> <li>h) Action taken to extinguish the fire.</li> </ul>			
R4.2	The licensee or its employees or agents must notify the EPA in accordance with conditions R2.1 and R2.2 of all fires at the premises as soon as practical after becoming aware of the incident.	See response to above condition R4.1.	Not Verified	Councils incident process includes a note to to call the EPA for all relevant incidents. A record of this was with the fire on the 24/12/17. The EPA where notified and kept in the loop when a small fire was noticed on the tip face.