



TLCCG

Tullamarine Landfill
Community Consultation Group

MEETING NOTES

WEDNESDAY

24 October 2018

6.00pm for 6.30 – 9.00pm

Hume Global Learning Centre
1093 Pascoe Vale Road, Broadmeadows

FACILITATOR: SUSAN McNAIR, CURRIE COMMUNICATIONS

NOTE TAKER: SOPHIE CLAYTON, CURRIE COMMUNICATIONS

MEETING PURPOSE

- i. Update on any changes since April meeting (where the site is at).
- ii. Understand the requirements under the PC PAN and process from here (future management).
- iii. Confirm on-going topics for community consultation and process for 2019.

ATTENDEES

Community

- Sam Cetnola, resident
- Ovi Clements, Terminate Toxic Tulla Dump Action Group (TTTDAG)
- Mick Colaci, TTTDAG and resident
- Lolita Gunning, resident
- Prue Hicks, TTTDAG
- Graeme Hodgson, TTTDAG and resident
- Russell Nilsson, TTTDAG and resident
- Helen Patsikatheodorou, TTTDAG and resident
- Frank Rivoli, TTTDAG
- Kim Westcombe, resident

EPA Victoria

- Jeremy Settle, Field Team Leader, Metropolitan Region
- Alistair Nairn, Advisor - Strategic Partnerships

Cleanaway

- Stephanie Holland, Post Closure Technical Lead
- Kieran McDermott, Environment Specialist
- Meldina Klehic, Regional Manager

Apologies

- Peter Barbetti
- Olga Ghiri, Cleanaway
- Helen and Jos van den Berg
- Harry van Moorst

Facilitator: Susan McNair, Currie Communications

Note taker: Sophie Clayton, Currie Communications

ABOUT THESE NOTES

Currie Communications has produced these notes, which aim to provide detailed minutes that cover the key information that was provided in the meeting. However, these notes are not intended to be a transcript of the meeting, and discussions, comments and questions have been summarised to reduce the overall length of this document.

Presenters were given the opportunity to review the notes relating to their item to ensure the discussion was accurately summarised, and that it details best available knowledge at the time of the meeting. Attending community members were also given the opportunity to provide feedback, which was addressed by Currie. Additional comments or relevant information received after the meeting have been highlighted in red, and useful hyperlinks have been added to text as additional references.

These notes will be posted on the Tullamarine Community Information page on the Cleanaway website www.cleanaway.com.au/community/major-project/tullamarine-closed-landfill-vic/ and will be available to the public. All meeting participants were asked if they wanted their names to be removed from public version of the document.

The intent of these meeting notes is to promote open communication between Cleanaway, local government, community and EPA Victoria. They are not to be used in a manner that compromises this objective.

AGENDA

1. Welcome, introductions (Susan McNair)
2. Meeting principles and purpose (Susan McNair)
 - 2.1. Principles (revisit boards around the room)
 - 2.2. Purpose:
 - i. Update on any changes since April meeting (where the site is at)
 - ii. Understand the requirements under the PC PAN and process from here (future management)
 - iii. Confirm on-going topics for community consultation and process for 2019
3. Review of rolling actions (Susan McNair)
4. Where the site is at: Operational update (Stephanie Holland, Cleanaway)
5. Future management of site: Post Closure Pollution Abatement Notice (Jeremy Settle, EPA)
6. Confirm agenda for 2019 (Susan McNair)
 - 6.1. Workshop on-going topics of community interest, existing information available, points for clarification, agree way forward, responsibility
7. Meeting close (Susan McNair)

Item 1: Welcome, introductions

Susan McNair (Facilitator) welcomed everyone and all attendees introduced themselves.

Item 2: Meeting principles and purpose

Susan noted the previously agreed principles were not available to review and invited the group to discuss how they wanted the meeting to progress. Participants noted the following principles for conduct of the meeting:

- Respect each other
- Give everyone a fair go and a chance to speak
- Openly share information and be transparent
- No personal attacks
- Be clear and concise information – make the message clear
- Be truthful and honest

The purpose of the meeting as stated in the agenda was reviewed and no changes were requested.

Item 3: Review of rolling actions

0316_02: EPA to provide updates on the Community Consultant Assessment at future TLCCG meetings.

Alistair reminded the group a consultant was chosen by TTTDAG but they did not deliver the service after a delay of more than a year. They returned their payment. Finding an independent consultant is proving difficult and discussions are ongoing, but the money for the work is still available. Graeme noted that EPA had been extremely patient with the consultant and in the management of the contract. This action item will be **closed**.

Members of TTTDAG will continue looking for a replacement and liaise directly with EPA regarding this.

0217_2: Cleanaway to provide Anthony Lane with the assessments of the ability of the current bore network to detect DNAPL.

Kieran reported this action was complete and that the report was completed December 2017 and sent to community members. In March 2018, there was an email sent inviting questions that were answered. This action item will be **closed**.

1017_1: Helen to make a new approach to Hume City Council councillors to invite representation on TLCCG.

Helen noted she had not made progress on this action, but Graeme noted that he and Olga and others had made numerous attempts to invite councillors. This action item will be **closed**.

1017_3: Cleanaway to report to TLCCG on feedback received regarding the stormwater connection design.

Stephanie noted this will be included in her report prepared for this meeting. This action item will be **closed**.

1017_4: Cleanaway to consult Melbourne Water to see if they are 'wedded' to the concrete pipe outlet to the creek.

Stephanie noted this will be included in her report prepared for this meeting. This action item will be **closed**.

1017_5: At the next TLCCG meeting, Cleanaway to explain the proposal to increase the extraction of landfill gases, and whether this will involve additional gas well/s and/or cap penetration.

This action item has been completed and will be **closed**.

1017_6: Cleanaway to distribute raw data from the groundwater bore testing to TLCCG members.

This action item has been completed and will be **closed**.

0418_1: EPA to notify TLCCG when the new Post Closure Pollution Abatement Notice (PC PAN) is finalised.

Alistair noted that he had sent the PC PAN to Andrea Mason (former note taker) and that Olga Ghiri (Cleanaway) had emailed it to community members on 7 June 2018. Community members noted they had not yet seen it.

Action follow up: Alistair to forward the PC PAN to Susan for on-sharing with the group and to attach to the meeting notes (see Attachment 2).

0418_2: EPA to confirm new onsite monitoring requirements.

Alistair noted this will be included in EPA's report prepared for this meeting. This action item will be **closed**.

0418_3: Cleanaway to report on settlement rate of the landfill showing any difference between the original state and change over time (at the next meeting).

This action item has been completed and will be **closed**.

0418_4: Cleanaway to provide the data for bores MB87, MB88, MB89 and MB90 by 18 May.

The group was reminded that the results were sent via email from Andrea with previous meeting notes.

Graeme reported that the community had found and reported some inconsistencies within the first report. He noted the community was upset, and disappointed that the inconsistencies were not picked up by Cleanaway before the report was sent to the community. He acknowledged that Olga responded promptly and corrected the report.

He also noted the report had since been corrected and the revised second version sent to the community, but it did not refer back to the original and that it had been corrected and updated.

This action item will be **closed**.

0418_5: Cleanaway to provide a statement to the community outlining the ongoing monitoring of the flare, the instruments to be used and the technical limitations regarding these measurements.

Stephanie noted she was not able to provide the statement at this time but would follow up.

The rolling action list has been updated and is attached to these meeting notes (Appendix 1).

Item 4: Where the site is at: Operational update

Stephanie Holland provided an update, summarised as follows:

- In September 2018, the groundwater leachate monitoring data was taken – the report is currently being written and Cleanaway has yet to see the results, but they are due within two weeks.
- The monitoring plan and risk assessment for the site is being updated including gas, groundwater leachate and the monitoring requirements for the site. This will be completed in about two weeks.
- Cleanaway has engaged a [Section 53V environmental auditor](#) for the site. Under the PC PAN, the site must be audited every three years by Cleanaway. The first audit will assess the risks of the site, what has been done in terms of monitoring and if any further actions are needed. If the risks increase, then the frequency of the audits may increase.
- On 31 March 2019, the first PC PAN report is due. This will summarise all the monitoring done at the site. Work will start on this in the next two months.
- The first audit of the site will be done in February or March 2019.
- There will be grounds maintenance on site during October and November to address weeds and to mow the cap.
- A new monitoring contractor for the perimeter gas bores and service pits was appointed in March 2018. They can be identified by their bright orange clothes.
- The stormwater system will be assessed on the risk register as part of the next audit so the auditor can recommend future action. This audit will set the tone and standards going forward.

A discussion followed summarised as follows:

Question: Has Melbourne Water been involved in the audit to involve their engineers, who may have useful expertise, especially in relation to filtering?

The auditor is a subject matter expert and has been rigorously assessed and approved by EPA. They will look at the site's stormwater management, groundwater management, leachate, gas and everything.

The EPA added that the independent auditor is from the large company [GHD](#) and that they will not be working alone. GHD's broader pool of experts will contribute as necessary – such as hydro engineers.

Question: In the April 2018 notes, the stormwater design by Golder was noted as being assessed internally by Cleanaway. Has a final decision been made?

Cleanaway will not go ahead with the stormwater design by Golder. Cleanaway will not discount anything the auditor recommends regarding filtration systems.

Question: Will that mean the stormwater design will start over again?

The proposed new design was going to cost \$1.5 million, however the current system is working. If the risk assessment update and monitoring plan identifies additional monitoring requirements and the auditor verifies the

need for that action, then Cleanaway will be bound to act. In such a case, Cleanaway would have to respond within two or three months and if action was not taken they would be fined. Cleanaway takes the matter very seriously.

Stephanie further confirmed that the statement from the last notes that “The current system is maintaining adequate control of stormwater on the site in the interim” still stands. Additional assessments supported this, including that the frogs were thriving, which was a community concern.

Question: Is Melbourne Water involved as a stakeholder in the creek?

If there is a significant rainfall event and Cleanaway has to discharge a lot of stormwater, Cleanaway would have to consult with Melbourne Water and the discharged water would have to be cleaner than the destination water and Melbourne Water may put limits on the volume as well.

Question: What was the realignment header line angle to the flare and how is the flare performing?

Stephanie noted she didn’t know the precise angle. She further noted that the flare is performing well with no flow rate problems since realignment, but there is still land mass migration in a few bores quite close to the landfill but Cleanaway has a PAN to address this. During the monitoring plan and risk assessment update, how Cleanaway can reach best practice compliance with EPA will be considered. Cleanaway has also engaged another contractor to realign another section of the header to get better fall.

Question: Has the cap settled or was there a problem with the original design?

It’s normally the pipe work, but if there may be condensate that sits in the low points, but that is not known until the pipes are opened.

Question: Is there a mechanism to make sure waste from other sources, such as the airport, is not entering the system?

Stephanie noted that consultants, not from Cleanaway, were working with the airport and that they monitor pollution migration from that site.

Jeremy added that pollution migration can occur through groundwater or the creek. The groundwater sits a few metres below the base of the landfill, so any contamination in the groundwater will not ‘climb’ back into the landfill.

Question: Has there been any testing of Moonee Ponds Creek for any PFASs (per- and poly-fluoroalkyl substances)?

Jeremy said he had not seen any airport monitoring data on PFASs and do not know their surface water sampling program, but could find out if required.

Question: Was the groundwater monitoring the same style of testing across all bores and does it include the new bores in the residential areas?

Stephanie confirmed that it was the same and that it is a requirement.

Question: How long do the bores have to stay in place?

Until Cleanaway is allowed to cease monitoring them. The EPA makes that decision depending on when monitoring indicates that landfill has stabilised. Most sites are monitored for a minimum of 30 years.

Kieran added that there have been ten phases of bore installation with the first established in the 1970s and the current network set up after 2007. There are currently 120 bores and the auditor can always request more.

Item 5: Future management of site: Post Closure Pollution Abatement Notice

Jeremy Settle provided an update on the PC PAN looking at the most relevant parts only, summarised as follows:

- The PC PAN has been issued but it did take a long time, three years, to be delivered, although drafts have previously been shared with the community.
- Victoria is now standardising regulation of all closed landfills in the state. Some of the requirements in the PC PAN may seem unnecessary for this site but it is because of this standardisation process that requires a proforma to be completed.
- LC7: Cleanaway is noted as having financial insurance in place, as an insurance against risks presented by the site.
- LC8: Take all practical measures to prevent landfill gas from exceeding the noted standard of methane and CO₂ emissions in perimeter bores and any surface detected methane.
- LC9.1: Monitor leachate levels within the landfill to see if it is decreasing as estimated.
- LC11: Monitoring must be done in accordance with the post closure management plan. The site is a very large site so different aspects (including leachate, groundwater, gas, surface water, landfill cap) have different monitoring requirements.
- The post closure management plan must be reviewed and updated every three years commencing 31 March 2019, and more frequently should conditions change.
- On the 31st of March every year (commencing 2019) Cleanaway must produce an annual report to show how they are tracking against all requirements.
- A 53V environmental audit must be done every three years by an approved environmental auditor. They can recommend a decrease or increase in the frequency of audits based on their assessment.
- Cleanaway has already been fulfilling all the obligations of the PC PAN. What has changed is around how EPA regulates it which will increase transparency because audits are published on EPA's website. It now ties the process back to the EPA Act and formalises the process.

A discussion followed summarised as follows:

Question: how do audits fit into the new Act?

Audits exist under the new Act, but the mechanisms by which they operate are currently being developed.

Question: If audits are done once every three years, if there is a problem with the annual reporting, how will that be identified to address the problems sooner than once every three years?

Stephanie noted that all content that goes into the annual reports will go to the EPA. The EPA will look for trends in reports to identify breaches and problems and issue notices accordingly. Moreover, Cleanaway will be liable if they provide inaccurate information.

Alistair added that EPA provides some balance around the process by doing spot reviews as another way to identify issues. Jeremy also noted that the EPA has a separate operation unit for auditors and this unit will do checks on independent auditors and EPA field staff will also go through the audits. Both community and environmental risks are assessed.

Question: If the self-reporting is inaccurate how will that be identified promptly?

The EPA will assess both the audits and annual reports to look for problems. Moreover, there are penalties for both the company and the auditor if information reported is inaccurate. And, while EPA does not do the monitoring

themselves, the auditor, based on the trends, makes an assessment if every three years is a suitable frequency for a risk assessment. EPA also inspects the site and takes reports from the community about any potential issues.

A number of community members expressed dissatisfaction with EPA's current processes for checking and verifying reports and audits because they thought it was not rigid enough to identify if inaccurate information was being reported.

EPA added that the new EPA Act was another step towards improving processes, and that the Act was the framework within which EPA staff can operate.

Meldina also noted that Cleanaway is listed on the Australia Stock Exchange and has a social license to operate. Anything that the company does wrong or that is not in the best interests of shareholders would likely be publicised and would be a major problem.

Question: Will there be new EPA officers on councils?

Alistair noted that a Government pilot program trialling EPA Officers for the Protection of the Local Environment (OPLEs) is locality based, but focuses on smaller scale pollution such as localised dust, odour or noise. It has not yet been determined whether the pilot will be rolled out more broadly. An announcement will be made in 2019.

Item 6 Confirm agenda for 2019

Attendees participated in an interactive session to identify the top issues the community wished to continue to receive information on and how they wanted to receive that information:

The key issues of equal importance and in no particular order noted by community members were:

- Stormwater
- LNAPL
- Groundwater
- The cap

The community also noted:

- The need to build trust and relationships, and to maintain face-to-face conversations.
- The need for meetings to be focussed on a topic or run after report to go through it together.
- The need for ongoing openness in reporting.
- Community members have expertise and can help to achieve common objectives.

Item 7: Other matters

Audit report availability

The annual audit will be done in February-March and will be submitted shortly thereafter to EPA. Not all Section 53V audits are automatically made public.

New action

1018_01: Jeremy to check if the audit will be made public.

Flare performance

Question: When will next test be done on flare and what is Cleanaway doing to bring the destruction rates to 99.99%?

Stephanie said the flare had been calibrated last month. She apologised for 99.99% destruction rate statement made previously and reiterated that it was effectively impossible to achieve 100% destruction in the flare.

Cleanaway acknowledgement

Lolita acknowledged that Cleanaway had been working really hard to remedy the site as well as they could and that its effort were appreciated.

Improved meeting alignment

Community members agreed that the dates of future meetings should be better aligned with the release of reports or other key activities so the meetings could be more productive and optimised.

New action

1018_02: Set the dates of future meetings so they align with the release of a report or other relevant activity.

Process for reporting and notes

The process for reporting on the meeting was confirmed as follows:

1. Draft 1 meeting notes are sent to Cleanaway and EPA to make any technical corrections.
2. After technical corrections are included, the revised Draft 2 meeting notes are sent to community members who attended the meet for their input.
3. After community member input has been addressed, the Final meeting notes will be distributed to all meeting attendees and published on Cleanaway's website.

Post-meeting note: Currie has updated the 'About these notes' section at the beginning of these meeting notes to better reflect this process.

Council engagement

Community members expressed an interest in sending the meeting notes to Hume City Council.

New action

1018_03: Susan to forward meeting notes to council to encourage their interest and engagement.

Meeting closed at 8.50pm.

Appendix 1: Rolling action list

UPDATED 24 October 2018

| Reference | Action | Who | Status |
|-----------|---|-----------|---|
| 0418_1 | EPA to notify TLCCG when the new Post Closure Pollution Abatement Notice (PCPAN) is finalised. | Alistair | <i>Complete:</i> Alistair noted that he had sent the PC PAN to Andrea Mason (former note taker). Community members noted they had not yet seen it. Attached to meeting notes. |
| 0418_5 | Cleanaway to provide a statement to the community outlining the ongoing monitoring of the flare, the instruments to be used and the technical limitations regarding these measurements. | Stephanie | 24/10/18: Stephanie noted she was not able to provide the statement at this time but would follow up within two weeks. |
| 1018_01 | Jeremy to check if the audit will be made public. | Jeremy | <i>Complete:</i> EPA has confirmed that the Section 53V audit that will be done in Feb/Mar 2019 on the Tullamarine site will be publicly available. |
| 1018_02 | Set the dates of future meetings so they align with the release of a report or other relevant activity. | Susan | 24/10/18: Community expressed the imperative to have meetings timed appropriately to discuss reports. Susan will work to identify suitable meeting dates so they are aligned with other activities. |
| 1018_03 | Susan to forward meeting notes to council to encourage their interest and engagement. | Susan | 24/10/18: Once finalised, Susan will send. |

Appendix 2: Post Closure Pollution Abatement Notice

POST-CLOSURE POLLUTION ABATEMENT NOTICE

Mr. Vik Bansal
CLEANAWAY PTY LTD
Level 4 441 ST KILDA RD
MELBOURNE VIC 3004

TO: CLEANAWAY PTY LTD ACN: 000 164 938

ADDRESS: Level 4 441 ST KILDA RD, MELBOURNE VIC 3004

PREMISES: 206-300 WESTERN AV, MELBOURNE AIRPORT VIC 3045

LEGAL REFERENCE: EP Act 1970 s.31A(1) Remedial notice required to address current or likely pollution, environmental hazard, or non-compliance

Who we are: Environment Protection Authority (EPA) Victoria is an independent statutory authority established under the *Environment Protection Act 1970* (the EP Act). Our purpose is to protect and improve our environment by preventing harm to the environment and human health.

Why we serve remedial notices: Remedial notices are served to prevent or remedy actual or likely pollution, environmental hazards and a range of non-compliances with the EP Act.

What you are required to do: Section 31A(2) of the EP Act requires you to comply with the requirements in this notice with one or more actions to prevent or remedy an actual or likely non-compliance. Under section 60A(1), if someone plans to take control of your premises, you must notify them of this notice and your progress towards compliance.

When you are required to act: 30 days from the date below.

If you want compliance dates extended: An application to extend a compliance date listed in Section 3 of this notice must be received *at least 10 working days prior to the compliance date*. Application forms, available at www.epa.vic.gov.au/business-and-industry/forms must be addressed to the Manager of the EPA office listed on this notice with the subject line: "Notice amendment application". Your served notice remains legally binding until EPA advises of any change. Refer to the Remedial notices policy (publication 1418) for further information on amendment applications.

What happens if you do not comply: If found guilty of contravening a requirement of this notice, you may be ordered to pay a fine of up to 2400 penalty units (\$380,568) and an additional penalty of up to 1200 penalty units for each day the offence continues (\$190,284 a day).

What your review rights are: You may apply in writing to the Victorian Civil and Administrative Tribunal (VCAT) within 21 days of date of this notice for review of decisions regarding the serving or requirements. For further information on how to apply contact VCAT on (03) 9628 9777.

Supporting Information: Guidance documents to help you understand your PC PAN include:

- *Closed Landfill Guidelines* (Publication 1490) - detailing how to comply with Notice requirements, landfill monitoring and the role of environmental auditors.
- *Best Practice Environmental Management, Siting, Design, Operation and Rehabilitation of Landfills* (Publication 788) - detailing required outcomes for landfill management which must be achieved under the Victorian Waste Management Policy.
- Environmental Auditors Guidelines for Appointment and Conduct (EPA Publication 865).
- Hydrogeological Assessments (EPA Publication 668)

For the purpose of this notice 'You' means the recipient of this notice or your authorised representative and 'Premises' means the site at the premises address, as identified above.

A handwritten signature in blue ink, appearing to read 'C. Reichenbach', is positioned above a horizontal dotted line.

Craig Reichenbach

DELEGATE OF THE ENVIRONMENT PROTECTION AUTHORITY

DATE OF ISSUE: 18/05/2018

NOTICE STRUCTURE

1 EPA OBSERVATIONS

This section details what was observed during the inspection.

2 REASONS FOR VIEW FORMED

This section interprets the observations and articulates why the authorised officer believes a pollution abatement notice should be issued in accordance with section 31A of the EP Act.

3 REQUIREMENTS - WHAT OUTCOMES ARE REQUIRED TO COMPLY?

Considering the view that has been formed, this section lists the requirements or actions to address the environmental risk(s) or impact(s).

4 AN EXAMPLE OF HOW YOU CAN COMPLY

This section provides an example of how you may achieve compliance with the requirements of this notice.

5 PLAN OF PREMISES AND LOCALITY PLAN

This section contains a plan of the premises and the locality of the site.

1 EPA OBSERVATIONS

1.1 The premises was an active landfill for the disposal of Solid Inert and Prescribed Industrial Wastes (both solid and liquid) to land under EPA Licence HS346 between 1972 and 2008. Liquid waste disposal at the premises ceased in 1987. The site was subsequently regulated under Notice NO8168 issued in December 2009 and the Licence was surrendered in October 2010.

1.2 In October 2007, EPA received a report titled "Secondary Risk Assessment Tullamarine Landfill" and subsequently in December 2007, received an Environmental Audit Report of the Secondary Risk Assessment. These reports found that a number of the potential beneficial uses of groundwater have been precluded in broadly defined areas both on and off-site.

1.3 Wastes deposited within the landfill are continuing to generate landfill gas as stated in the document, Ambient Air & Landfill Gas Management Plan Revision 001 September 2012. Landfill gas must be managed to prevent migration beyond the landfill, both to air at the surface and via sub surface lateral migration into the geology at and beyond the boundary of the waste mass.

1.4 The environmental risks posed by landfill sites continue for a significant period of time after waste acceptance has ceased, ongoing aftercare management is therefore necessary to minimise these risks.

1.5 As stated in the Waste Management Policy (Siting, Design and Management of Landfills) Section 16(4), EPA requires the occupier to undertake ongoing aftercare until such time as the site does not pose a risk to human health or the environment.

2 REASONS FOR VIEW FORMED

The premises was an active landfill for the disposal of Solid Inert and Prescribed Industrial Wastes (both solid and liquid) to land under EPA Licence HS346 between 1972 and 2008. Multiple assessment documents and audits have found the landfill continues to, or has the potential to, detrimentally impact the environment if not appropriately managed.

The site requires ongoing monitoring, management and assessment to ensure that risks to the environment can be assessed, and where appropriate and practicable, actions can be taken to manage these risks to ensure that they remain low or acceptable.

The landfill is likely to cause or has caused pollution of waters in contravention of section 39(1) of the EP Act because the condition of the waters is likely to be changed to make it detrimental to any beneficial use made of those waters.

On this basis, and considering the observations previously stated, I have formed a view and I am satisfied that:

- a use of the premises

is likely to cause or has caused pollution, as per section 31A(1)(a) of the EP Act.

In order to address this, you must meet the requirements listed in this notice.



.....
Craig Reichenbach
AUTHORISED OFFICER
EPA Metro
EPA Victoria
Date of Issue: 18/05/2018

3

REQUIREMENTS - WHAT OUTCOMES ARE REQUIRED TO COMPLY?

General Requirements

LC1. You must not accept any wastes at the premises.

LC2. You must control all sources of offensive odours at the premises such that they are not discharged beyond the boundaries of the premises.

LC3. You must install and maintain controls such that contaminated surface water or surface expressions of leachate is not discharged beyond the boundaries of the premises.

LC4. You must control all sources of dust such that it is not discharged beyond the boundaries of the premises.

LC5. You must not burn waste at the premises.

LC6. You must control all sources of litter such that it is not deposited beyond the boundaries of the premises.

LC7. You must provide EPA with a financial assurance satisfactory to the EPA, and maintain such assurance (including any part of such assurance) so that it can be claimed on, utilised or realised as and when required.

LC8. You must take all practical measures to prevent emissions of landfill gas from exceeding the levels specified in the Best Practice Environmental Management Guidelines, Siting, Design, Operation and Rehabilitation of Landfills, 12 August 2015 (EPA Publication 788.3).

LC9.1. By the dates specified in Schedule 1 of the Hydrogeological Assessment Report (Hydrogeological Assessment, Tullamarine Closed Landfill, Revision 3 dated 26 June 2015), you must extract leachate from the cells such that it does not exceed the levels specified for each cell.

LC11. You must implement with the most recent version of the Post Closure Management Plans for the site as submitted to EPA, which incorporates environmental auditor reviewed actions and tasks for the monitoring, reporting and management (including treatment) of:

- a). leachate,
- b). off-site groundwater impacts,
- c). landfill gas,
- d). surface water, and
- e). landfill cap maintenance.

The Post Closure Management Plan must be reviewed and updated at least every three years commencing the 31 March 2019, or more frequently should conditions change such that a review becomes necessary. Updates to the Post Closure Management Plan must include auditor review.

LC12. You must engage an environmental auditor to conduct environmental audits in accordance with section 53V of the Environment Protection Act 1970 every three years.

Reporting Requirements

LC13. By 31st March each year you must supply to the Authority an annual statement on your compliance with or progress towards compliance with each requirement of this notice.

LC13.1. You must retain all documents and monitoring records used for the preparation of the annual report for a period of at least 7 years.

LC14. You must immediately notify EPA of non-compliance with any requirement of this notice.

4**AN EXAMPLE OF HOW YOU CAN COMPLY**

One way of achieving compliance with this notice would be to:

4.1 Aftercare management of the landfill must have regard to the Environment Protection Act 1970, Victorian State Environment Protection Policies and related EPA Guidance.

4.2 EPA publication 1490, Closed Landfill Guidelines, outlines the expected outcome for each requirement and how this can be achieved. Where variations to the standard requirements have been made further advice has been provided.

4.3 Manage leachate in accordance with the hydrogeological assessment. Requirement LC9 will be inserted by amending this notice once long term leachate management levels are agreed upon by EPA.

4.4 Manage landfill gas such that gas action levels in table 6.4 of the Best Practice Environmental Management, Siting, Design, Operation and Rehabilitation of Landfills (Publication 788), the "Landfill BPEM", are met.

4.5 Undertake aftercare of the closed landfill in accordance with the most recent version of the EPA approved Post Closure Management Plan for the site.

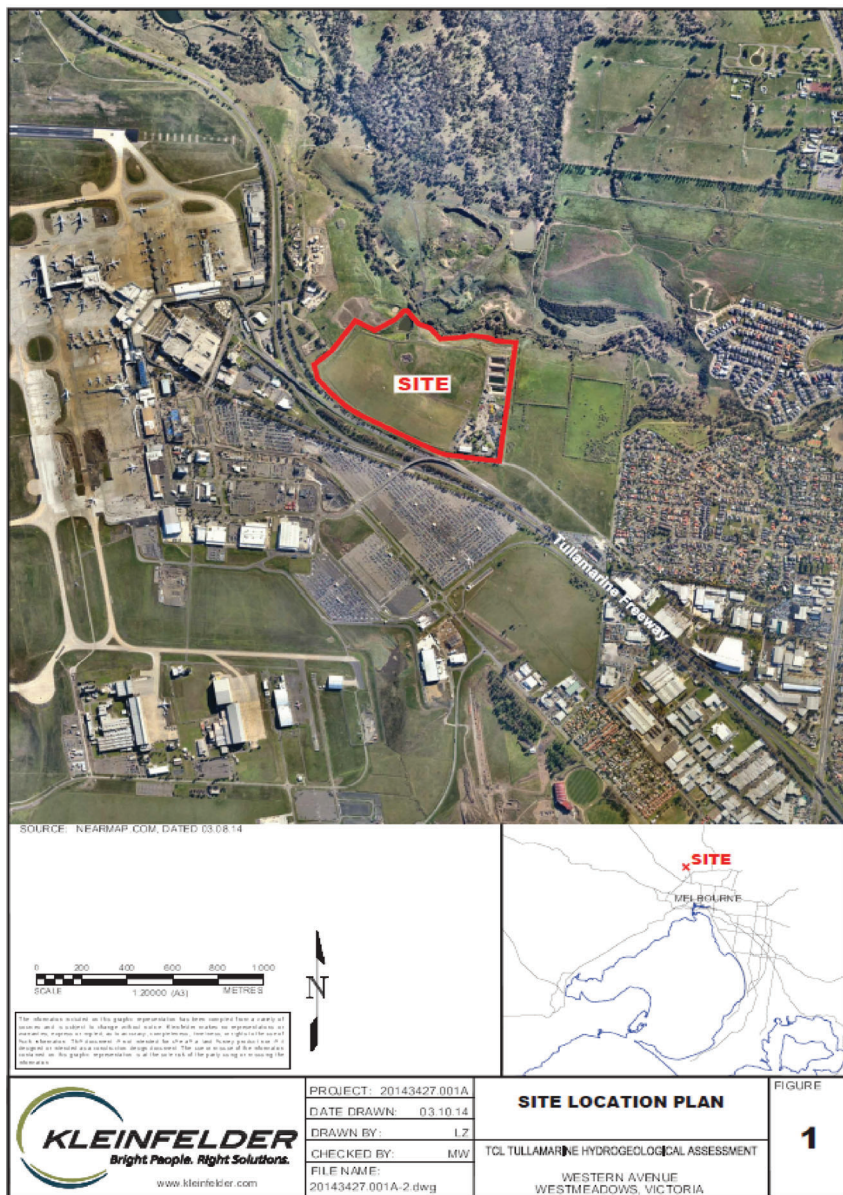
5

PLAN OF PREMISES AND LOCALITY PLAN



| | |
|---|--|
| Notice: | 90004621 |
| Company Name: | CLEANAWAY PTY LTD |
| ACN: | 000 164 938 |
| Premises Address: | 206-300 WESTERN AV, MELBOURNE AIRPORT VIC 3045 |
| Before relying on the information in this map, users should carefully evaluate its accuracy, currency, completeness and relevance for their purposes, and should obtain any appropriate professional advice relevant to their particular circumstances. | |

5 PLAN OF PREMISES AND LOCALITY PLAN



| | |
|---|--|
| Notice: | 90004621 |
| Company Name: | CLEANAWAY PTY LTD |
| ACN: | 000 164 938 |
| Premises Address: | 206-300 WESTERN AV, MELBOURNE AIRPORT VIC 3045 |
| Before relying on the information in this map, users should carefully evaluate its accuracy, currency, completeness and relevance for their purposes, and should obtain any appropriate professional advice relevant to their particular circumstances. | |