



# **Waste reporting, record keeping and measurement standard**

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# Contents

<b>Abbreviations .....</b>	<b>1</b>
<b>1 Introduction .....</b>	<b>3</b>
<b>2 Monthly returns .....</b>	<b>4</b>
2.1 Manner and form of monthly returns .....	4
2.2 Stockpiles .....	5
<b>3 Waste and matter stream and type .....</b>	<b>6</b>
3.1 Waste and matter stream .....	6
3.2 Waste and matter type .....	6
<b>4 Measurement of waste and other matter .....</b>	<b>9</b>
4.1 Conversion factors.....	9
<b>5 Survey requirements .....</b>	<b>14</b>
<b>6 Stocktake requirements .....</b>	<b>17</b>
<b>7 Record keeping requirements .....</b>	<b>18</b>
7.1 Records on the measurement of waste by method other than weighbridge .....	18
7.2 Records in relation to vehicles.....	18
7.3 Additional requirements in relation to making, retention and availability of records .....	18
<b>8 Video monitoring systems .....</b>	<b>19</b>
<b>9 Vehicle flow plans.....</b>	<b>20</b>



## Abbreviations

EP Act	<i>Environment Protection Act 1993</i>
EPA	South Australian Environment Protection Authority (established under Division 1 of Part 3 of the <i>Environment Protection Act 1993</i> )
MBR	mass balance reporting
MSW	Municipal solid waste
EP Regulations	<i>Environment Protection Regulations 2009</i>



# 1 Introduction

Part 6 of the [Environment Protection Regulations 2009 \(EP Regulations\)](#) sets out requirements for reporting, record keeping and measuring of waste and other matter for the purposes of monthly returns<sup>1</sup> for mass balance reporting and waste levy payments.

This document, *Waste reporting, record keeping and measurement standard*, is published under the EP Regulations<sup>2</sup> and outlines further regulatory requirements under the EP Regulations. This document should be read in conjunction with the EP Regulations.

Failure to adhere to the standard may result in non-compliance with the EP Regulations and penalties under the *Environment Protection Act 1993* (EP Act) may apply.

Further information regarding mass balance reporting and waste levy requirements is available on the EPA website: [epa.sa.gov.au/environmental\\_info/waste\\_recycling/mass-balance-reporting](http://epa.sa.gov.au/environmental_info/waste_recycling/mass-balance-reporting)  
[epa.sa.gov.au/business\\_and\\_industry/waste-levy](http://epa.sa.gov.au/business_and_industry/waste-levy)

If you have any queries or are unsure about how these requirements apply to you, please contact (08) 8204 2004 or email the EPA via [epainfo@sa.gov.au](mailto:epainfo@sa.gov.au) and provide your EPA licence number.

## Version history

This standard was first published in June 2021.

A revised version of this standard was published in June 2022, which added material types (MSW Trommel Fines, Compost Like Organic Waste, asbestos contaminated soils and expansion on waste plastic material types) under section 3.2 for the purposes of mass balance reporting, made changes to section 4.1 to enable exemptions from use of a weighbridge to be given where 'adequate alternative methods' are used, and made revisions to sections 5 and 6 to provide greater simplicity and clarity to survey and stocktake requirements.

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<sup>1</sup> A monthly return under regulation 71(1) or 71(2)

<sup>2</sup> Regulation 68A(1)

## 2 Monthly returns (regulation 71)

### 2.1 Manner and form of monthly returns

A person required to provide a monthly return under regulation 71(1) – *for waste levy payment purposes* or 71(2) – *a mass balance report* must do so ‘in the manner and form approved by the Authority’.

#### Waste levy monthly return

Waste levy monthly returns under regulation 71(1) must be submitted via the EPA online Environment Licensing Forms (ELF) licensee portal, in the manner and form provided for by that system: <https://www.elf.sa.gov.au>

See [Waste Levy Regulations Guideline](#) for further information.

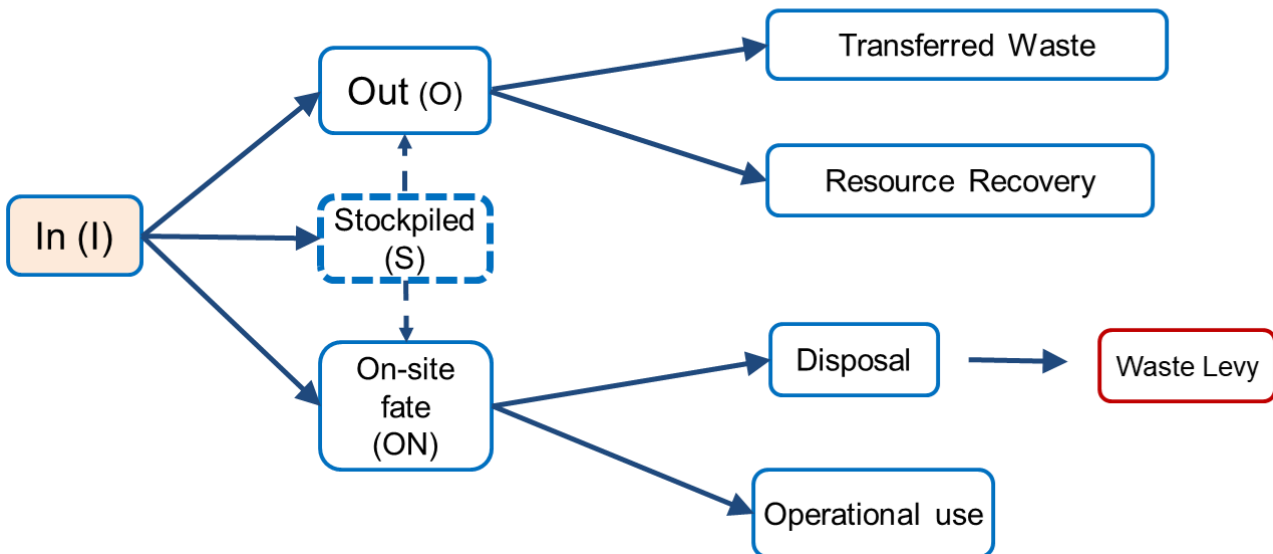
#### Mass balance report monthly return

Mass balance report monthly returns under regulation 71(2) must be submitted via the EPA licensee portal ELF in the manner and form provided for by that system. Licensees can either:

- enter data directly into the online mass balance reporting module<sup>3</sup> or
- the data can be uploaded using formats provided in the [mass balance webpage](#), into the reporting module.

Mass balance reporting is intended to capture material flows at depots as outlined in the following diagram.

$$\text{Mass Balance: } I + S_{\text{prev mth}} = O + S_{\text{current mth}} + \text{ON}$$



Mass balance conceptual diagram

In addition to waste depots prescribed in the regulations, under regulation 71(2)(c) waste depots that receive waste or other matter specified in the standard must also complete a mass balance report. It is noted that the standard does not currently prescribe any waste or other matter for this purpose.

For further guidance on the specific mass balance report monthly reporting requirements see the information sheet, [Mass balance monthly reporting for waste depots](#).

<sup>3</sup> To be created as part of mass balance reporting system development. Links to this system will be updated once available.



## 2.2 Stockpiles

The total mass (in tonnes) of waste and other matter (material) stockpiled at the depot must be determined by the following mass balance formula:

$$\text{Stockpiled material} = \text{material onsite from previous reporting period} + \text{material received at the site} - \text{material transferred from the site} - \text{waste disposed of (including cover)} - \text{material used for approved operational purposes}$$

Where the depot has evidence that the total stockpiled mass determined using the above formula is inaccurate (eg as a result of moisture loss or gains) the licensee may provide a corrected figure for stockpiled material in tonnes. Under regulation 71(3)(h), if the licensee provides a corrected figure, they must also include a justification for how the corrected figure was determined, including:

- the reason for the change in mass
- a description of how the amount of change was determined
- any further information requested by the EPA in writing.

### 3 Waste and matter stream and type (regulation 68A)

This section outlines how the waste and matter stream under regulation 68A(3) and waste and matter type under regulations 68A(2) are to be determined for the purposes of Part 6 of the EP Regulations (including reporting and record keeping).

'Waste and matter' refers to any material defined as 'waste' under section 4 of the EP Act, any material derived from waste, and material that is intended to be combined with waste or waste derived material.

These waste and matter streams and types are provided to achieve reporting objectives under Part 6 of the EP Regulations. Further delineation of waste or matter may be required by licensees to ensure compliance with licence requirements, for example, in relation to wastes or matter permitted to be received at the site.

#### 3.1 Waste and matter stream

Under regulation 68A(3), the waste and matter stream is to be determined in accordance with the following definitions. The waste and matter stream which best describes the source of the waste must be used:

- **Municipal Solid Waste (MSW)** – The solid component of the waste stream arising from mainly domestic but also commercial, industrial, government and public premises including waste from council operations, services and facilities that is collected by or on behalf of the council via kerbside collection, but does not contain Commercial and Industrial Waste (General), Listed Waste, Hazardous Waste or Radioactive Waste.
- **Commercial and Industrial Waste (C&I)** – the solid component of the waste stream arising from commercial, industrial, government, public or private collections from domestic premises (ie not collected as Municipal Solid Waste) but does not contain Listed Waste, Hazardous Waste or Radioactive Waste.
- **Construction and Demolition Waste (C&D)** – the solid component of the waste stream arising from the construction, demolition or refurbishment of buildings or infrastructure, including waste soils and fills
- **Hazardous Waste** – listed waste having a characteristic described in Schedule A List 2 of the *National Environment Protection (Movement of controlled waste between States and Territories) Measure*
- **Other** – if it is not possible to identify whether the waste is municipal waste, commercial and industrial waste or construction and demolition waste.

#### 3.2 Waste and matter type

Under regulation 68A(2), the waste and matter type which best describes the predominant material is to be determined using Table 1. Classifications must be as specific as possible.

**Table 1** Material types

Material type
Abattoir waste (including meat rendering)
Aggregate/rubble/sand
Ash (other than fly ash)
Asbestos
Asbestos contaminated soils
Used asphalt
Battery - lead acid
Battery - other including lithium and cadmium
Biosolids, manures

<b>Material type</b>
Bricks
Cardboard
Carpet
Ceramics, pottery
Clinical and related waste
Co-mingled recyclables
Compost
Compost Like Organic Waste (CLOW)
Concrete
Contaminated waste - high level
Contaminated waste - intermediate
Contaminated waste - low level
Dredging spoil
E-waste
Fly ash
FOGO - food organics/garden organics
Food organics
Foundry sand
Glass
Green waste - vegetation or garden organics
Insulation
Listed waste
Masonry
Mattresses
Metals - mixed
Metals - aluminium
Metals - non-ferrous
Metals - steel/ferrous
Mixed waste - commercial bins
Mixed waste - kerbside
Mixed waste - hard waste
Mixed waste - residuals
Mixed waste - self-haul/drop-off
Mixed waste - skip bin
Mulch

<b>Material type</b>
Municipal Solid Waste Trommel Fines (MSWTF)
Quarried materials, eg gravels
Onsite excavated
Paper/cardboard - mixed
Paper
Plasterboard
Plastics 1 - polyethylene terephthalate (PET)
Plastics 2 - high density polyethylene (HDPE)
Plastics 3 - polyvinyl chloride (PVC)
Plastics 4 - low density polyethylene (LDPE)
Plastics 5 - polypropylene (PP)
Plastics 6 - polystyrene (PS)
Plastics - certified compostable plastics
Plastics - mixed
Quarantine waste
Radioactive waste
Reclaimed asphalt pavement (RAP)
Refuse derived fuel/solid recovered fuel
Road profilings
Shredder floc
Soil amendments
Soils - high level contaminated
Soils - low level contaminated
Soils - intermediate
Soils - unclassified
Street sweepings
Textiles
Timber (excluding trees)
Tyres
Waste derived fill
Waste fill
Waste fines
Waste grease, oils and fat (including liquid organics used in composting)
Whitegoods

## 4 Measurement of waste and other matter (regulations 71A & 73)

Regulation 71A prescribes how the mass or volume of waste and other matter is to be determined for the purposes of a return under regulation 71(1) and (2).

### 4.1 Conversion factors

Under regulation 71A(3)(a), the mass of solid waste and other matter may, in the case of a landfill depot<sup>4</sup>, be determined prior to disposal using methods other than an approved weighbridge in the following circumstances:

- Where the waste and other matter has been received for the purpose of being used as cover for landfill at the site, and has been weighed using a weighbridge upon being received – methods or conversion factors approved in writing by the EPA for that site may be used.

Under regulation 71A(3)(b)(i)(B), for the purposes of providing a monthly return under regulation 71(1), where a landfill depot<sup>4</sup> disposes of less than 10,000 tonnes of solid waste per year and does not have an onsite approved weighbridge – the average net mass of waste and other matter is to be determined using conversion factors in Table 2 for the relevant class of vehicle.

Under regulation 71A(3)(b)(i)(B), for the purposes of providing a mass balance report under regulation 71(2), the average net mass of waste and other matter may be determined using conversion factors in Tables 3 to 6.

Under regulation 73(1)(b) the EPA may, on application by the holder of a waste depot licence, exempt the holder from compliance with the requirement in regulation 71A(3)(b)(ii) that the mass of solid waste and other matter is to be determined by use of an approved weighbridge if satisfied that:

- An onsite weighbridge cannot be used by certain classes of vehicle for safety with regard to site layout or for logistical reasons, and
- Adequate alternative methods of measuring the mass of solid waste and other matter (such as site specific conversion factors) are available, and
- There are appropriate record keeping and auditing practices in place.

**Table 2 Conversion classes for monthly returns under regulation 71(1)**

Vehicles Class	tonnes
Class 1 – Car/station wagon	0.15
Class 2 – Car-type utility, panel van or single box axle trailer	0.70
Class 3 – Large utilities, large vans or multi-axle trailers	1.3

**Table 3 MBR small to medium vehicle factors**

Vehicles class – small to medium vehicles	General waste	Green waste	Soil/waste fill
Car/station wagon	0.15	0.1	0.2
Single axle trailer, ute, van	0.3	0.2	0.4
Tandem axle trailer	0.6	0.4	0.8
Large utilities, large vans, multi-axle trailers	1.0	0.7	1.3

<sup>4</sup> 'landfill depot' as defined in Schedule 1, Part A, clause 3(3)(a) of the *Environment Protection Act 1993*

**Table 4 Truck factors**

<b>Vehicles class – trucks</b>	<b>tonnes</b>
<b>Compactor trucks</b>	
Enclosed compactors up to <9 m <sup>3</sup>	1.7
Enclosed compactors 9–12 m <sup>3</sup>	5.0
Enclosed compactors 13–19 m <sup>3</sup>	8.5
Enclosed compactors 20–32 m <sup>3</sup>	10.6
Enclosed compactors >32 m <sup>3</sup>	14.9
<b>Open trucks</b>	
Open truck, gross weight <5 t	0.9
Open truck, gross weight >5 t<12 t	1.8
Open truck, 3 axles (6-wheeler)	3.0
Open truck, 4 axles (8-wheeler)	3.6
Open truck, 5 axles (Bogie semi or 6-wheel pig trailer)	5.4
Open truck, 6 axles (tri-axle semi)	6.0
Open truck, 8 axles	7.8
Open truck, 9 axles (8-wheeler plus trailer)	9.6
Open truck, 11 axles (road train)	12.0
<b>Single/tandem/twin rear axle</b>	
Twin steer with twin rear axles – MSW/C&I	5.57
Twin steer with twin rear axles – C&D	7.61
Twin steer with twin rear axles – Sand/soil/rock	10.97
Tipping semi-trailer – MSW/C&I	5.79
Tipping semi-trailer – C&D, Sand/soil/rock	15.0
B-double	39.3

**Table 5 Material type volume conversion factors**

<b>Material type</b>	<b>tonnes/m<sup>3</sup></b>
<b>C&amp;D</b>	
Uncompacted asphalt/road profilings	1.8
Compacted asphalt	2.4
Bricks	1.2
Masonry	1.0
Concrete	1.5
Insulation	0.75
Plasterboard	0.22

Material type	tonnes/m <sup>3</sup>
<b>Soils/gravel/rocks</b>	
Soil	1.8
Sand/recycled sand	1.7
Quarried materials, eg boulders, cobbles, gravels	1.4
PM <sub>1</sub> /PM <sub>2</sub> recycled roadbase	1.85
10-mm aggregate	1.3
20-mm aggregate	1.2
<b>Green waste</b>	
Green waste – garden organics	0.2
Green waste – compacted	0.26
Green waste – uncompacted/loose	0.15

Material type	tonnes/m <sup>3</sup>
<b>Containers</b>	
Aluminium cans – baled	0.154
Aluminium cans – flat	0.087
Containers – co-mingled	0.063
Glass bottles – semi-crushed	0.347
Glass bottles – whole	0.174
Plastic containers – baled	0.139
Plastic containers – whole	0.01
Steel cans – baled	0.226
Steel cans – flat	0.13
<b>Metals</b>	
Metals	0.9
<b>Paper/board</b>	
Paper	0.15
Cardboard	0.13
Paper/cardboard	0.1
<b>Other</b>	
Carpet	0.3
General/mixed waste	0.15
Hazardous waste	0.2
Inert (mixed) waste	1.3
MGBs – mobile garbage bins or wheelie bins	0.06

Material type	tonnes/m <sup>3</sup>
Rubber	0.3
Textiles – other	0.15
Wood/timber	0.3

Table 6 Unit factors

Per item	tonnes/m <sup>3</sup>
<b>Whitegoods<sup>~</sup></b>	
Air conditioner	0.060
Dishwasher/dryer/oven	0.050
Fridge/freezer	0.060
Microwave	0.015
Washing machine	0.07
<b>Batteries<sup>*</sup></b>	
Motorcycle – 4-kg average	0.004
Car	0.013
SUV/4WD/light commercial	0.022
Heavy truck	0.4
<b>E-waste<sup>^</sup></b>	
Laptops/notebooks	0.0024
Monitors – CRT	0.0114
Monitors – other	0.0064
Printers – inkjet/dot matrix/laser	0.0089
Other devices	0.003
PCs/CPU's	0.0119
Peripherals	0.0008
TV – <80 cm	0.007
TV – >80 cm	0.02
<b>Mattresses</b>	
Queen size	0.04
<b>Tyres<sup>#</sup></b>	
Motorcycle	0.004
Passenger car	0.008
Light truck/bobcat/small forklift	0.016
Truck/large forklift	0.04
Super single	0.08



Per item	tonnes/m <sup>3</sup>
Solid small (up to 3 m high)	0.024
Solid medium (>0.3 m–0.45 m)	0.04
Solid large (>0.45–0.6 m)	0.056
Solid extra-large (>0.6 m)	0.072
Tractor – small (up to 1 m high)/grader	0.12
Tractor – large (>1–2 m)	0.2
Earthmover – small (up to 1 m)	0.16
Earthmover – medium (>1–1.5 m)	0.4
Earthmover – large (>1.5–2 m)	0.8
Earthmover – extra-large (>2–3 m)	1.6
Earthmover – giant (>3–4 m)	3.2

~ Median value taken from a range of values for each appliance type

\* Battery weights sourced from battery manufacturers and the average calculated

^ Unit weights from National Television and Computer Recycling Scheme

# Average tyre weights sourced from Tyre Stewardship Australia with standard Equivalent Passenger Unit (EPU) of 8 kg for end-of-life tyres

## 5 Survey requirements (regulations 74 & 74A)

Regulations 74 and 74A prescribe that specified waste depots (e.g. landfill depots which have disposed of 10,000 tonnes of more of solid waste) are required to provide a topographic and volumetric survey of the whole depot site to the EPA. The survey must be undertaken in accordance with the requirements of this standard.

The survey must meet the following requirements<sup>5</sup>:

- 1 The site survey must be carried out by a licensed or registered surveyor under the *Survey Act 1992* unless otherwise exempt in writing by the EPA<sup>6</sup>.
- 2 Survey results and calculations must be presented as a topographical plan for the base surface of the waste depot. Base information should extend to the boundary or approved perimeter of the waste depot. Plans should be drawn at 1:250, 1:500 or 1:1,000 scale on A1-size sheets.
- 3 All levels must be related to Australian Height Datum and the origin of the levels noted on the plans.
- 4 Cadastral boundaries or approved perimeter boundaries, the limits of the volume determination and date of survey must be clearly denoted on the plans.
- 5 Stockpiles and excavated areas must be clearly identified on the plans.
- 6 The total volume consumed and excavated since the preceding survey submitted to the EPA must be calculated.
- 7 The following information must be provided with the survey:
  - a the date the survey was completed at the site
  - b total design capacity (if known) of the disposal cell(s)
  - c total void space remaining in the cell(s)
  - d total volume in the disposal cell(s) consumed since the preceding survey provide to the EPA
  - e total volume of material excavated from the site since the preceding survey provided to the EPA
  - f surface area of covered waste
  - g total volume change across the site since the preceding survey provided to the EPA.
- 8 For each stockpile, the following information must be provided:
  - a In the case of stockpiles of **combustable material** (as defined in table 7), or stockpiles of any other material if requested in writing by the EPA, the following details for each stockpile:
    - i an identification reference number
    - ii material type
    - iii mass determination method (i.e. estimated, surveyed)
    - iv location (i.e. undercover, in a container, or in the open)
    - v dimensions (maximum height, width, length, and surface area of the stockpile)
    - vi total volume (in cubic metres)
    - vii total mass (tonnes)
    - viii density factor used to calculate the mass (in kilograms per cubic meter)
  - b In the case of stockpiles of any other material:
    - i material type

<sup>5</sup> For the purpose of regulation 74(2)(c), 74A(1), 74A(3)(d)

<sup>6</sup> For the purpose of regulation 74(2)(d), 74A(3)(e)

- ii mass determination method (estimated, surveyed)
  - iii total volume (in cubic metres)
  - iv total mass (tonnes)
  - v density factor used to calculate the mass (in kilograms per cubic metre)
- c If directed in writing by the EPA, an image of the waste or materials in the stockpile taken at the time of survey with sufficient proximity and clarity to allow the identification of the material type, with a brief description of the materials shown in the image.
- 9 Details must be provided regarding the total mass of material that has been received, transferred, disposed of (including for cover) or used for operational use in the period from the first day of the month in which the survey is undertaken until the day of the survey (to enable verification of material mass relative to monthly reports).
- 10 The completed survey report must be signed by an authorised person to certify correctness and submitted with the survey plans.
- 11 The licensee must upload the required survey information via the EPA online ELF licensee portal at <https://www.elf.sa.gov.au> in the manner and form provided for by that system.

**Table 7 Combustable material types**

Material type
Battery - lead acid
Battery – other: examples include Li, Cd, etc
Biosolids, manures
Cardboard
Carpet
Clinical and related waste
Co-mingled recyclables
Compost
Compost Like Organic Waste (CLOW)
E-waste
FOGO - food organics/garden organics
Food organics
Green waste - vegetation or garden organics
Insulation
Listed waste
Mattresses
Metals - mixed
Mixed waste - commercial bins
Mixed waste - kerbside
Mixed waste - hard waste
Mixed waste - residuals
Mixed waste - self-haul/drop-off
Mixed waste - skip bin

<b>Material type</b>
Mulch
Municipal Solid Waste Trommel Fines (MSWTF)
Paper/cardboard - mixed
Paper
Plastics 1 - polyethylene terephthalate (PET)
Plastics 2 - high density polyethylene (HDPE)
Plastics 3 - polyvinyl chloride (PVC)
Plastics 4 - low density polyethylene (LDPE)
Plastics 5 - polypropylene (PP)
Plastics 6 - polystyrene (PS)
Plastics - certified compostable plastics
Plastics - mixed
Refuse derived fuel/solid recovered fuel
Shredder floc
Street sweepings
Textiles
Timber (excluding trees)
Tyres
Waste fines
Waste grease, oils and fat (including liquid organics used in composting)

## 6 Stocktake requirements (regulations 74 and 74B)

Regulation 74 and 74B prescribe that a person licensed to conduct a waste depot is required to provide a stocktake of waste and other matter at the depot to the EPA. The stocktake must be carried out in accordance with any requirements of this standard.

The stocktake must meet the following requirements<sup>7</sup>:

- 1 The stocktake must be carried out by a licensed or registered surveyor under the *Survey Act 1992*, unless otherwise exempted in writing by the EPA<sup>8</sup>.
- 2 The stocktake must include a site plan. Plans should be drawn at 1:250, 1:500 or 1:1,000 scale and include stockpile identification references for each stockpile.
- 3 The following details for stockpiles at the site must be provided:
  - a In the case of stockpiles of **combustable material** (as defined in table 7), or stockpiles of any other material if requested in writing by the EPA, the following details for each stockpile:
    - i an identification reference number
    - ii material type
    - iii mass determination method (i.e. estimated, surveyed)
    - iv location (i.e. undercover, in a container, or in the open)
    - v dimensions (maximum height, width, length, and surface area of the stockpile)
    - vi total volume (in cubic metres)
    - vii total mass (tonnes)
    - viii density factor used to calculate the mass (in kilograms per cubic metre)
  - b In the case of stockpiles of any other material:
    - i material type
    - ii mass determination method (estimated, surveyed)
    - iii total volume (in cubic metres)
    - iv total mass (tonnes)
    - v density factor used to calculate the mass (in kilograms per cubic metre)
  - c If directed in writing by the EPA, an image of the waste or materials in the stockpile taken at the time of survey with sufficient proximity and clarity to allow the identification of the material type, with a brief description of the materials shown in the image.
- 4 Details must be provided regarding the total mass of material that has been received, transferred, disposed of (including material used for cover) or used for operational purposes in the period from the first day of the month in which the stocktake is undertaken until the day of the stocktake, in order to enable verification of material mass relative to monthly reports.
- 5 The stocktake report must be signed by an authorised person to certify its correctness, and submitted with the site plan.
- 6 Licensees must upload the required stocktake information via the EPA online ELF licensee portal at <https://www.elf.sa.gov.au> in the manner and form provided for by that system.

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<sup>7</sup> For the purpose of regulation 74(3)(b), 74B(5)(b), 74B(5)(c)

<sup>8</sup> For the purpose of regulation 74(3)(a), 74B(5)(d)

## **7 Record keeping requirements (regulations 75A, 75E and 75G)**

Record keeping requirements are listed in regulations 75A to 75H. The following provides further detail and specification in addition to those requirements.

It is noted that no further detail is currently specified in the standard under regulations 75C(f), 75D(f), 75E(e), or 75F(e).

### **7.1 Records on the measurement of waste by method other than weighbridge**

Under regulation 75A the following information must be recorded in relation to the method used to measure waste and other matter:

- the conversion factor used for each load received, used, disposed of at, or transported from the depot
- details relating to the source of the conversion factors used (eg conversion factors listed in this standard or EPA approved site-specific conversion factors).
- the amount of each load (in tonnes) received, used, disposed of at, or transported from the depot as calculated using the applicable conversion factor.
- the date that each load is received, used, disposed of, or transported from the depot.

### **7.2 Records in relation to vehicles**

Under regulation 75E(2)(b) the following vehicles are not needed by the EPA to be recorded when entering the site:

- vehicles carrying non-waste materials which will not be combined with waste at the site
- vehicles not related to the waste activity at the site.

### **7.3 Additional requirements in relation to making, retaining and availability of records**

Under regulation 75G(a), records must be kept in the following manner and form:

- be readily available and safely accessible
- be kept in a manner that is exportable (ie electronic – csv or excel format) to EPA systems
- be able to be copied
- display all information required under the regulations and this standard.

## **8 Video monitoring systems (regulation 75I)**

Under regulation 75I(1)(a) and 75I(2)(a), a video monitoring system is required and must be installed:

- so that all vehicles entering the depot can be identified by make, model and registration number
- the recordings must be held in a secure location to avoid tampering or deletion.

## 9 Vehicle flow plans (regulation 75K)

Under regulation 75K(a), if a licensee is required to prepare a vehicle flow plan in relation to vehicle movements at the depot the plan must indicate the proposed vehicle flow controls, including the entry and exit points where waste is transported into and out of the waste depot.

The licensee must:

- prepare the vehicle flow plan in accordance with any requirements specified by the EPA in writing
- submit the vehicle flow plan to the EPA within the timeframe specified by the EPA in writing
- submit a revised vehicle flow plan to the EPA if there are any changes to vehicle flow, no later than 30 days after the change occurs
- keep a copy of the latest vehicle flow plan at the depot and make the plan available for inspection and copying by an EPA authorised officer on request.