



NSW Site Auditor Scheme

Site Audit Statement

A site audit statement summarises the findings of a site audit. For full details of the site auditor's findings, evaluations and conclusions, refer to the associated site audit report.

This form was approved under the *Contaminated Land Management Act 1997* on 12 October 2017. For information about completing this form, go to Part IV.

Part I: Site audit identification

Site audit statement no. **ALC_2**

This site audit is a:

statutory audit

~~non-statutory audit~~

within the meaning of the *Contaminated Land Management Act 1997*.

Site auditor details

(As accredited under the *Contaminated Land Management Act 1997*)

Name **Dr Ian C Swane**

Company **Ian Swane & Associates Pty Ltd**

Address **PO Box 359, Mortdale NSW**

Postcode **2223**

Phone **0418 867 112**

Email iswane@bigpond.com

Site details

Address **Asbestos waste Disposal Site located 1.5 km south of the Homestead Site along Bartalumba Bay Road near Anindilyakwa, Groote Eylandt, Northern Territory – refer Figures 1 – 3, LTEMP (attached)**

Postcode **0822**

Property description

(Attach a separate list if several properties are included in the site audit.)

NT Portion 1632, Survey Plan CP 004201. The GPS coordinates for the four corners of the galvanised pipe fence surrounding the containment cell are (0656690E, 8469349N); (0656734E, 8469357N); (0656726E, 8469391N); (0656687E, 8469380N). The GPS coordinates of the containment cell constructed within the Disposal Site And measured by Agon are shown in Figure 2, LTEMP (attached).

Local government area **Northern Territory (NT) Government**

Area of site (include units, e.g. hectares) **0.40 ha (4,000 m²)**

Current zoning **Open space / bushland**

Regulation and notification

To the best of my knowledge:

- the site is the subject of a declaration, order, agreement, proposal or notice under the NT Waste Management and Pollution Control (WMPC) Act 1998 ~~Contaminated Land Management Act 1997~~ or the ~~Environmentally Hazardous Chemicals Act 1985~~, as follows:** (provide the no. if applicable)

~~Declaration no.~~

~~Order no.~~

~~Proposal no.~~

- Pollution Abatement Notice (PAN) No. 2018/8 issued by the NT Environment Protection Authority (EPA) dated 18/12/18 (Ref [21])**
-

- the site is not** the subject of a declaration, order, proposal or notice under the *Contaminated Land Management Act 1997* or the *Environmentally Hazardous Chemicals Act 1985*.

To the best of my knowledge:

- the site has been notified to the NT EPA under the WMPC Act 1998 section 60 of the ~~Contaminated Land Management Act 1997~~**

- ~~the site **has not** been notified to the EPA under section 60 of the *Contaminated Land Management Act 1997*.~~

Site audit commissioned by

Name **Wesley van Zanden - Mining and Environment Officer**

Company **Anindilyakwa Land Council (ALC)**

Address **PO Box 172, 30 Bougainvillea Drive, Alyangula NT**

Postcode **0885**

Phone **0459 991 402**

Email wvanzanden@alcnt.com.au

Contact details for contact person (if different from above)

Name **Dr Ian Hollingsworth - Mining & Sustainability Manager, ALC**

Phone **0460 022 247**

Email ihollingsworth@alcnt.com.au

Nature of statutory requirements (not applicable for non-statutory audits)

- ~~Requirements under the *Contaminated Land Management Act 1997* (e.g. management order; please specify, including date of issue)~~
- ~~Requirements imposed by an environmental planning instrument (please specify, including date of issue)~~
- ~~Development consent requirements under the *Environmental Planning and Assessment Act 1979* (please specify consent authority and date of issue)~~
- Requirements under other legislation (please specify, including date of issue): **NT W MPC Act 1998**

Purpose of site audit

- ~~**A1** To determine land use suitability~~

~~Intended uses of the land:~~

~~OR~~

- ~~**A2** To determine land use suitability subject to compliance with either an active or passive environmental management plan (EMP)~~

~~Intended uses of the land:~~

~~OR~~

(Tick all that apply)

- ~~**B1** To determine the nature and extent of contamination~~
- ~~**B2** To determine the appropriateness of:~~
 - ~~an investigation plan~~
 - ~~a remediation plan~~
 - ~~a management plan~~
- ~~**B3** To determine the appropriateness of a **site testing plan** to determine if groundwater is safe and suitable for its intended use as required by the *Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017*~~
- B4** To determine the compliance with an approved:
 - PAN No. 2018/6**
 - ~~voluntary management proposal~~ or
 - ~~management order~~ under the *Contaminated Land Management Act 1997*
- B5** To determine if the land can be made suitable for a particular use (or uses) if the site is ~~remediated~~ or managed in accordance with a specified plan.

Information sources for site audit

Consultancies which conducted the site investigations and/or remediation:

Agon Environmental and ALS

Titles of reports reviewed:

1. Agon Environmental (14 August 2018) '*Asbestos Findings Summary Report, Bartalumba Bay, Groote Eylandt NT*'. Document No: JA0336/01 prepared for Anindilyakwa Land Council
2. Agon Environmental (17 October 2018) '*Sample Analysis and Quality Plan, Bartalumba Bay, Groote Eylandt NT*'. Document No: JA0336-SAQP/01 prepared for Anindilyakwa Land Council
3. Agon Environmental (5 November 2018a) '*Asbestos Management Plan, Bartalumba Bay, Groote Eylandt NT*'. Document No: JA0336_AMP/02 prepared for Anindilyakwa Land Council
4. Agon Environmental (5 November 2018b) '*Containment Cell Siting Design & Management Plan, Bartalumba Bay, Groote Eylandt NT*'. Document No: JA0336_CCSDMP/01 prepared for Anindilyakwa Land Council
5. Agon Environmental (5 November 2018c) '*Remediation Action Plan, Bartalumba Bay, Groote Eylandt, NT*'. Document No: JA0336_RAP/02 prepared for Anindilyakwa Land Council
6. Agon Environmental (7 December 2018) '*Bartalumba Bay Homestead, Groote Eylandt Asbestos Remediation Project*'. Document No: JA0336 prepared for Anindilyakwa Land Council
7. Agon Environmental (22 March 2019) '*Close Out Report, Bartalumba Bay Homestead, Groote Eylandt*'. Document No: JA0336 Close Out Report - Final prepared for Anindilyakwa Land Council
8. Agon Environmental (5 September 2022) '*Audit Advice Response - Bartalumba Bay Homestead Asbestos Remediation Project, Groote Eylandt*'. Document No: JA0336_L-01 prepared for Anindilyakwa Land Council
9. Agon Environmental (16 September 2022) '*Remediation and Validation Report, Bartalumba Bay Homestead and Containment Cell, Groote Eylandt NT*'. Document No: JA0336_CCSDMP/01 prepared for Anindilyakwa Land Council
10. ALS (13 July 2023) '*Certificate of Analysis, Work Order EN2305275 for Anindilyakwa Land Council (ALC)*'. 8 pages

Other information reviewed, including previous site audit reports and statements relating to the site:

20. ALC (16 November 2018) '*Proposed Containment Cell, Bartalumba Bay Road*'. Figure No. LP-0012-01
21. NT EPA (18 December 2018) '*Pollution Abatement Notice No. 2018/6, Issued to Anindilyakwa Land Trust*'

Site audit report details

Title **Site Audit Report ALC_1 by Dr Ian Swane, Remediation of Asbestos Contamination at the former Bartalumba Bay Homestead Site, Groote Eylandt, Northern Territory 0822**

Report no. **ALC_1**

Date **21 November 2023**

Part II: Auditor's findings

Please complete either Section A1, Section A2 or Section B, not more than one section. (Strike out the irrelevant sections.)

- Use **Section A1** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **without the implementation** of an environmental management plan.
- Use **Section A2** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **with the implementation** of an active or passive environmental management plan.
- Use **Section B** where the audit is to determine:
 - (B1) the nature and extent of contamination, and/or
 - (B2) the appropriateness of an investigation, remediation or management plan¹, and/or
 - (B3) the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or
 - (B4) whether the terms of the approved voluntary management proposal or management order have been complied with, and/or
 - (B5) whether the site can be made suitable for a specified land use (or uses) if the site is remediated or managed in accordance with the implementation of a specified plan.

~~Section A1~~

~~I certify that, in my opinion:~~

~~The site is suitable for the following uses:~~

~~(Tick all appropriate uses and strike out those not applicable.)~~

- ~~Residential, including substantial vegetable garden and poultry~~
 - ~~Residential, including substantial vegetable garden, excluding poultry~~
 - ~~Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
 - ~~Day care centre, preschool, primary school~~
 - ~~Residential with minimal opportunity for soil access, including units~~
 - ~~Secondary school~~
 - ~~Park, recreational open space, playing field~~
 - ~~Commercial/industrial~~
 - ~~Other (please specify):~~
-

¹ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

OR

~~I certify that, in my opinion, the **site is not suitable** for any use due to the risk of harm from contamination.~~

~~Overall comments:~~

~~Section A2~~

~~I certify that, in my opinion:~~

~~Subject to compliance with the **attached** environmental management plan² (EMP), the site is suitable for the following uses:~~

~~(Tick all appropriate uses and strike out those not applicable.)~~

- ~~Residential, including substantial vegetable garden and poultry~~
- ~~Residential, including substantial vegetable garden, excluding poultry~~
- ~~Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
- ~~Day care centre, preschool, primary school~~
- ~~Residential with minimal opportunity for soil access, including units~~
- ~~Secondary school~~
- ~~Park, recreational open space, playing field~~
- ~~Commercial/industrial~~
- ~~Other (please specify):~~

~~EMP details~~

~~Title~~

~~Author~~

~~Date~~ ~~No. of pages~~

~~EMP summary~~

~~The EMP: (Tick appropriate box and strike out the other option.)~~

- ~~requires operation and/or maintenance of **active** control systems³~~
- ~~requires maintenance of **passive** control systems only³:~~

² Refer to Part IV for an explanation of an environmental management plan.

³ Refer to Part IV for definitions of active and passive control systems.

~~Purpose of the EMP:~~

~~Description of the nature of the residual contamination:~~

~~Summary of the actions required by the EMP:~~

~~How the EMP can reasonably be made to be legally enforceable:~~

~~How there will be appropriate public notification:~~

Overall comments:

Section B

~~Purpose of the plan⁴ which is the subject of this audit:~~

I certify that, in my opinion:

~~(B1)~~

~~The nature and extent of the contamination **has** been appropriately determined~~

~~The nature and extent of the contamination **has not** been appropriately determined~~

~~AND/OR (B2)~~

~~The investigation, remediation or management plan is appropriate for the purpose stated above~~

~~The investigation, remediation or management plan **is not** appropriate for the purpose stated above~~

~~AND/OR (B3)~~

~~The site testing plan:~~

~~**is** appropriate to determine~~

~~**is not** appropriate to determine~~

~~if groundwater is safe and suitable for its intended use as required by the *Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017*~~

~~AND/OR (B4)~~

~~The terms of the notice, approved voluntary management proposal* or management order** (strike out as appropriate):~~

~~have~~ been complied with

~~**have not** been complied with.~~

PAN No. 2018/6

~~*voluntary management proposal no.~~

⁴ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

~~**management order no.~~

AND/OR (B5)

The site **can be made suitable** for the following uses:

(Tick all appropriate uses and strike out those not applicable.)

- ~~Residential, including substantial vegetable garden and poultry~~
- ~~Residential, including substantial vegetable garden, excluding poultry~~
- ~~Residential with accessible soil, including garden (minimal home grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
- ~~Day care centre, preschool, primary school~~
- ~~Residential with minimal opportunity for soil access, including units~~
- ~~Secondary school~~
- ~~Park, recreational open space, playing field~~
- ~~Commercial/industrial~~
- Other (please specify): Containment cell for asbestos contaminated soil waste removed from the Homestead Site under PAN No. 2018/6**

IF the site is ~~remediated~~/managed* in accordance with the following plan (attached):

*Strike out as appropriate

Plan title	Long-Term Environmental Management Plan for the Disposal Site along Bartalumba Bay Road, Groote Eylandt (LTEMP)	
Plan author	Dr Ian Swane	
Plan date	21 November 2023	No. of pages 5

SUBJECT to compliance with the following condition(s):

1. **This Section B SAS numbered ALC_2 only applies to the Disposal Site legally defined as NT Portion 1632, Survey Plan CP 004201 where an engineered containment cell for asbestos contaminated soil removed from the Homestead Site in 2018 – 2019 has been constructed.**
2. **The Anindilyakwa Land Trust (ALT) is responsible for ensuring that the Disposal Site is managed in accordance with the LTEMP attached to this SAS or future amended versions accepted by the NT EPA.**
3. **The area occupied by the Disposal Site and the engineered containment cell are to be registered as an area of contaminated land on the NT EPA Contaminated Land and Environmental Audit Results register and the land title, as required by Condition 16 of PAN No. 2018/6.**

Overall comments:

1. **This site audit statement (SAS) should be read in conjunction with its Site Audit Report (SAR). The SAR provides a detailed review of documentation provided on the design, construction and long-term management requirements for the engineered containment cell constructed at the Disposal Site.**

2. **The outcomes achieved by the design and construction work for the engineered containment cell at the Disposal Site have met the requirements of the PAN No. 2018/6. While the timing of some activities were delayed, the required outcomes were achieved or can be achieved through implementation of the LTEMP.**
3. **A separate SAS numbered ALC_1 has been prepared for the long-term management of contamination risks at the former Bartalumba Bay Homestead Site legally defined as NT Portion 01199 plan(s) B 000517 (Figure 1, LTEMP).** ...

Part III: Auditor's declaration

I am accredited as a site auditor by the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997*.

Accreditation no. **9821**

I certify that:

- I have completed the site audit free of any conflicts of interest as defined in the *Contaminated Land Management Act 1997*, and
- with due regard to relevant laws and guidelines, I have examined and am familiar with the reports and information referred to in Part I of this site audit, and
- on the basis of inquiries I have made of those individuals immediately responsible for making those reports and obtaining the information referred to in this statement, those reports and that information are, to the best of my knowledge, true, accurate and complete, and
- this statement is, to the best of my knowledge, true, accurate and complete.

I am aware that there are penalties under the *Contaminated Land Management Act 1997* for wilfully making false or misleading statements.



Signed

Date **21 November 2023**

Part IV: Explanatory notes

To be complete, a site audit statement form must be issued with all four parts.

How to complete this form

Part I

Part I identifies the auditor, the site, the purpose of the audit and the information used by the auditor in making the site audit findings.

Part II

Part II contains the auditor's opinion of the suitability of the site for specified uses or of the appropriateness of an investigation, or remediation plan or management plan which may enable a particular use. It sets out succinct and definitive information to assist decision-making about the use or uses of the site or a plan or proposal to manage or remediate the site.

The auditor is to complete either Section A1 or Section A2 or Section B of Part II, **not** more than one section.

Section A1

In Section A1 the auditor may conclude that the land is *suitable* for a specified use or uses OR *not suitable* for any beneficial use due to the risk of harm from contamination.

By certifying that the site is *suitable*, an auditor declares that, at the time of completion of the site audit, no further investigation or remediation or management of the site was needed to render the site fit for the specified use(s). **Conditions must not be** imposed on a Section A1 site audit statement. Auditors may include **comments** which are key observations in light of the audit which are not directly related to the suitability of the site for the use(s). These observations may cover aspects relating to the broader environmental context to aid decision-making in relation to the site.

Section A2

In Section A2 the auditor may conclude that the land is *suitable* for a specified use(s) subject to a condition for implementation of an environmental management plan (EMP).

Environmental management plan

Within the context of contaminated sites management, an EMP (sometimes also called a 'site management plan') means a plan which addresses the integration of environmental mitigation and monitoring measures for soil, groundwater and/or hazardous ground gases throughout an existing or proposed land use. An EMP succinctly describes the nature and location of contamination remaining on site and states what the objectives of the plan are, how contaminants will be managed, who will be responsible for the plan's implementation and over what time frame actions specified in the plan will take place.

By certifying that the site is suitable subject to implementation of an EMP, an auditor declares that, at the time of completion of the site audit, there was sufficient information satisfying guidelines made or approved under the *Contaminated Land Management Act 1997*

(CLM Act) to determine that implementation of the EMP was feasible and would enable the specified use(s) of the site and no further investigation or remediation of the site was needed to render the site fit for the specified use(s).

Implementation of an EMP is required to ensure the site remains suitable for the specified use(s). The plan should be legally enforceable: for example, a requirement of a notice under the CLM Act or a development consent condition issued by a planning authority. There should also be appropriate public notification of the plan, e.g. on a certificate issued under s.149 of the *Environmental Planning and Assessment Act 1979*.

Active or passive control systems

Auditors must specify whether the EMP requires operation and/or maintenance of active control systems or requires maintenance of passive control systems only. Active management systems usually incorporate mechanical components and/or require monitoring and, because of this, regular maintenance and inspection are necessary. Most active management systems are applied at sites where if the systems are not implemented an unacceptable risk may occur. Passive management systems usually require minimal management and maintenance and do not usually incorporate mechanical components.

Auditor's comments

Auditors may also include **comments** which are key observations in light of the audit which are not directly related to the suitability of the site for the use(s). These observations may cover aspects relating to the broader environmental context to aid decision-making in relation to the site.

Section B

In Section B the auditor draws conclusions on the nature and extent of contamination, and/or suitability of plans relating to the investigation, remediation or management of the land, and/or the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or whether the terms of an approved voluntary management proposal or management order made under the CLM Act have been complied with, and/or whether the site can be made suitable for a specified land use or uses if the site is remediated or managed in accordance with the implementation of a specified plan.

By certifying that a site *can be made suitable* for a use or uses if remediated or managed in accordance with a specified plan, the auditor declares that, at the time the audit was completed, there was sufficient information satisfying guidelines made or approved under the CLM Act to determine that implementation of the plan was feasible and would enable the specified use(s) of the site in the future.

For a site that *can be made suitable*, any **conditions** specified by the auditor in Section B should be limited to minor modifications or additions to the specified plan. However, if the auditor considers that further audits of the site (e.g. to validate remediation) are required, the auditor must note this as a condition in the site audit statement. The condition must not specify an individual auditor, only that further audits are required.

Auditors may also include **comments** which are observations in light of the audit which provide a more complete understanding of the environmental context to aid decision-making in relation to the site.

Part III

In **Part III** the auditor certifies their standing as an accredited auditor under the CLM Act and makes other relevant declarations.

Where to send completed forms

In addition to furnishing a copy of the audit statement to the person(s) who commissioned the site audit, statutory site audit statements must be sent to

- the **NSW Environment Protection Authority**:
nswauditors@epa.nsw.gov.au or as specified by the EPA

AND

- the **local council** for the land which is the subject of the audit.

LONG-TERM ENVIRONMENTAL MANAGEMENT PLAN FOR THE DISPOSAL SITE ALONG BARTALUMBA BAY ROAD, GROOTE EYLANDT

by
Dr Ian C Swane

1. Purpose

- a) The purpose of this long-term environmental management plan (**LTEMP**) is to provide protocols for managing the Disposal Site located along Bartalumba Bay Road, Groote Eylandt, and the engineered containment cell constructed within the Disposal Site that was copnstructed in 2018 – 2019 to store ACM contaminated soil removed from the former Bartalumba Bay Homestead Site. A location plan for the Disposal Site is provided in **Figure 1**.
- b) The Disposal Site covers 0.4 ha of land legally defined as NT Portion 1632, Survey Plan CP 004201. The GPS coordinates for the four corners of the galvanised pipe fence surrounding the containment cell are (0656690E, 8469349N); (0656734E, 8469357N); (0656726E, 8469391N); (0656687E, 8469380N). The GPS coordinates of the containment cell constructed within the Disposal Site are shown in **Figure 2**.

2. Background Information

- a) The engineered containment cell at the Disposal Site was constructed under the supervision of the environmental consultant Agon in 2018 – 2019. A design schematic of the cell is provided in **Figure 3**.
- b) Agon reported that the rectangular cell has dimensions 28 x 20 m and was 3m deep when excavated. The top surface of the asbestos contaminated soil placed in the cell was covered by an orange geotextile. A clay cap was then constructed that was compacted by track-rolling to not less than 95% standard compaction.
- c) The clean clay cap has a minimum thickness of 1.0 m, which was verified by hand auger boreholes drilled by the Site Auditor and lab tests on samples of capping soil conducted in May 2023.
- d) The cap is covered by topsoil (minimum 200 mm thick) to support vegetation regrowth by natural reseeding and is graded with a 1% fall from the cell centre. These design features were verified by a site inspection conducted by the Site Auditor in May 2023.
- e) Natural revegetation of the area is occurring, with native plant and tree species re-establishing across the area. Soil erosion mitigation measures have been established across the area involving the placement of tree trunks to form stormwater barriers and the re-establishment of native vegetation.
- f) A galvanised pipe fence defines the boundary of the containment cell. The area is approximately rectangular in shape with lengths of 33 x 47 m. Warning signs are attached to the boundary fence surrounding the cell stating “*Warning, Asbestos Materials Buried in this Area, refer to the site asbestos register and asbestos management plan*”.
- g) The as-constructed condition of the engineered containment cell, this LTEMP, site audit statement ALC_2 and its associated site audit report are considered to meet the requirements of Pollution Abatement Notice (**PAN**) No. 2018/6 issued by the NT EPA dated 18/12/2018.
- h) Further information on the design and construction of the engineered containment cell and site conditions at the Disposal Site are provided in “*Site Audit Report ALC_1 by Dr Ian Swane, Remediation of Asbestos Contamination at the former Bartalumba Bay Homestead Site, Groote Eylandt, Northern Territory 0822*” dated 20/11/2023.

3. Roles and Responsibilities

- a) The Anindilyakwa Land Trust (**ALT**) is the owner of the Disposal Site and has overall responsibility for the implementation of this LTEMP. This should include, among other things, the ongoing review of the LTEMP’s implementation by the ALC documented in annual reports prepared by the ALC.

- b) The Anindilyakwa Land Council (**ALC**) is the operational arm of the ALT and has day-to-day operational responsibility for the implementation of this LTEMP. This includes:
- Ensuring the area occupied by the Disposal Site and the engineered containment cell are registered as an area of contaminated land on the NT EPA Contaminated Land and Environmental Audit Results register and the land title, as required by Condition 16 of PAN No. 2018/6;
 - The ALC Mining and Sustainability Manager or their delegated representative undertakes a 6-monthly inspection of the Disposal Site that involves, among other things, a detailed walkover survey, taking a photographic record of site conditions, and documenting the inspection results in a report;
 - Inspecting the Disposal Site without delay after a bushfire has damaged vegetation at or near the Disposal Site or after a major storm has caused significant damage to other parts of Groote Eylandt;
 - Preventing disturbance of the cap covering the engineered containment cell and to surface soils in other parts of the Disposal Site;
 - Maintaining a health vegetation cover and other soil erosion protection measures across the Disposal Site and repairing any soil erosion or damage to vegetation that may occur;
 - Restoring depressions and seal cracks within surface soils of the Disposal Site;
 - Supervising any work that may need to be done at the Disposal Site;
 - Up-dating the LTEMP on an as-needed basis, with a copy of any amended LTEMP to be sent to the NT EPA without delay;
 - Preparing an annual report on the implementation of this LTEMP;
 - Providing copies of records regarding implementation of this LTEMP to the NT EPA upon request;
 - Provide a copy of an updated Asbestos Register for the Disposal Site, endorsed by the Site Auditor, without delay (as required by the PAN); and
 - Any additional requirement of the NT EPA.

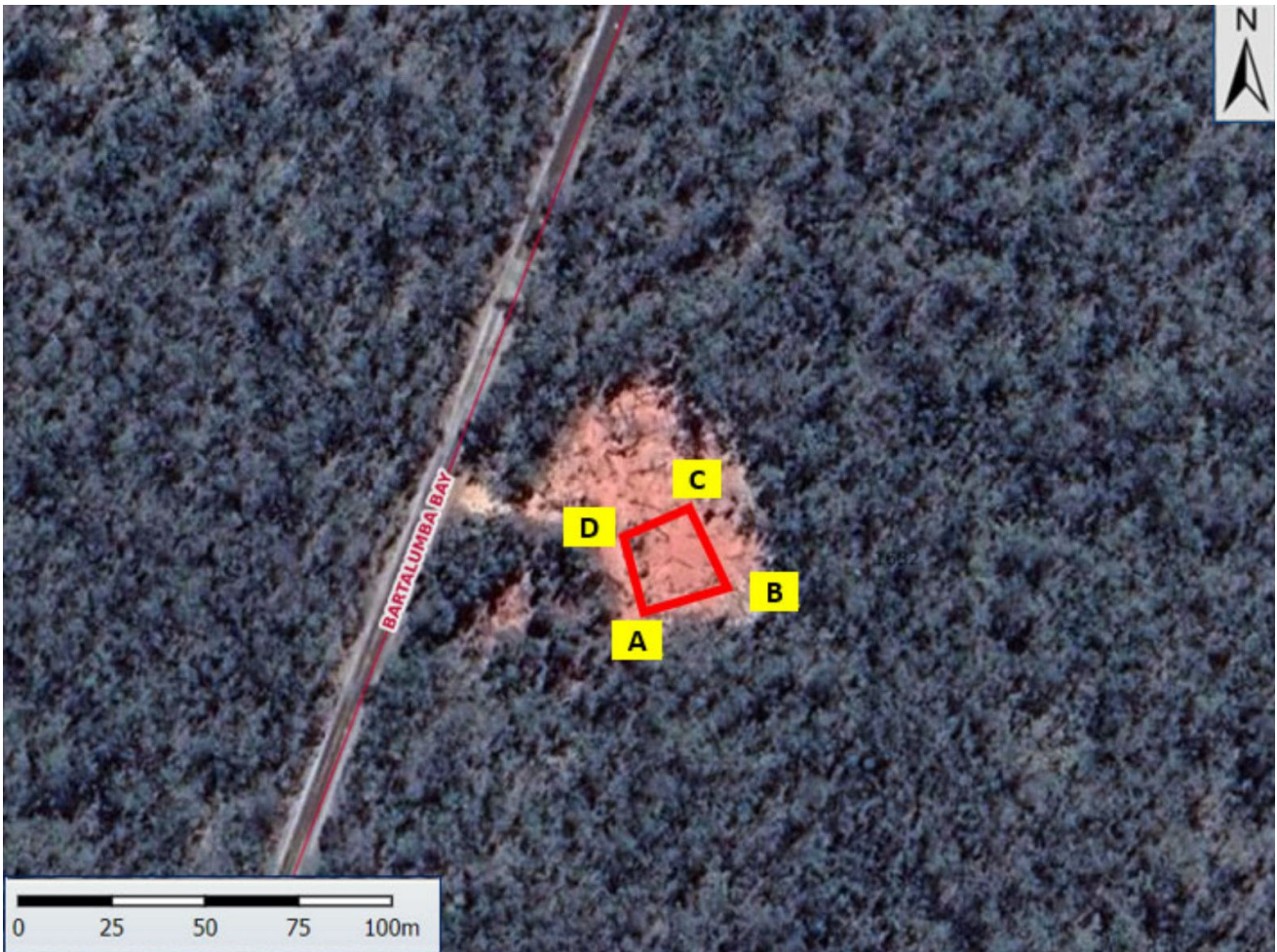
Figure 1 Location Plan for the Disposal Site and Containment Cell

(Source: Figure 2, Ref [9])



Figure 2 Containment Cell Location and GPS Coordinates

(Source: Fig 4 & Tab 5, Ref [9])



Corner	GPS Coordinates	
	Latitude	Longitude
A	13°50'28.31"S	136°26'59.82"E
B	13°50'28.07"S	136°27'0.62"E
C	13°50'27.25"S	136°27'0.24"E
D	13°50'27.63"S	136°26'59.58"E

Figure 3 Schematic Cross-section of Containment Cell Design

(Figure 13, Ref [4])

