



Pollution Incident Response Management Plan

EPL 6054: Waste Disposal by Application to Land - Crookwell Landfill Facility

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Version Control

List of relevant dates and amendments:

Version	Date	Description of Amendment	Effective From
1	October 2013	Draft	October 2013

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1.0 Introduction

The POELA Act 2011 introduces several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act includes a new requirement under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) to prepare, keep, test and implement a pollution incident response management plan.

The objectives of these plans are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as Local Councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability

2.0 Purpose

The purpose of the plan is to:

- Outline how the risk of a pollution incident will be minimised and controlled through the identification of risks and the development of planned actions to minimise and manage those risks.
- Document the notification protocol to ensure comprehensive and timely communication about a pollution incident is provided to all relevant stakeholders.
- Ensure the risks associated with the activity are mitigated, to ensure the protection of workers, community and the environment.
- Ensure compliance with all legislative requirements.

3.0 Scope

The plan applies to the operation of the Crookwell Waste Management Centre, located at Grabben Gullen Road, Crookwell NSW 2583. The EPA Licence for this facility is 6054. Figure 3.1 visually identifies the location of this facility.



Figure 3.1 – Crookwell Waste Management Centre

4.0 Incident Reporting

4.1 Legal Duty to Notify

It is the responsibility of all employees and contractors of the Upper Lachlan Shire Council, who are engaged in any work activity at the Crookwell Waste Management Centre, to notify management personnel of all environmental incidents and hazards which may result in an environmental incident, regardless of the nature or scale.

Notification responsibilities are detailed under the POEO Act (Section 148), which encompasses all site personnel, including contractors and subcontractors. These can be categorised as follows (extracts taken from section 148 of POEO act):

- *Duty of employee engaged in carrying on activity to notify A person engaged as an employee in carrying on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority.*
- *Duty of employer to notify Without limiting subsection (2), an employer who is notified of an incident under subsection (3) or who otherwise becomes aware of a pollution incident which is related to an activity of the employer, must immediately after being notified or otherwise becoming aware of the incident, notify each relevant authority of the incident and all relevant information about it.*

4.2 Incident Definition

The definition of a pollution incident, as taken from the POEO Act is:

“an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

(a) harm to the environment is material if:

- (i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

4.3 Incident Reporting

An incident that causes or threatens material harm to the environment shall be communicated to OEH as soon as practicable after first becoming aware of the incident. Initial contact will be via the 24 hour **OEH Pollution Hotline (133 555)**. Written notice shall follow within 7 days. Examples of incidences which require reporting may include but are not limited to:

- Identification of non-domestic quantities (200ml or g) of hazardous waste mixed amongst solid waste;
- Fires at the landfill;
- Mixing of leachate and stormwater or waste and stormwater;
- Identification of any failure of an environmental protection system;
- Detection of subsurface gas migration in perimeter gas well at greater than 5% (v/v) methane;
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

The occurrence of any such incident shall also be recorded in the operators daily log book.

POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Identifying non-domestic quantities of hazardous substances among waste	Medium	Low	Human errors made during waste screening
Surface or subsurface fires at active landfill, public receiving areas & recycling facility	Medium	Medium	High winds, dry weather, prolonged high temperatures and low humidity. Human errors made during waste screening, poor maintenance of plant and equipment, spontaneous combustion, hot embers in waste deliveries.
Surface or subsurface fires at inactive areas	Low	High	High winds, dry weather, prolonged high temperatures, low humidity and spontaneous combustion.
Mixing of leachate and stormwater or waste and stormwater	Low	Medium	Prolonged periods of heavy rain and lack of surface water pond and site maintenance.
Identification of any failure of an environmental protection system	Low	Low	Prolonged periods of heavy rain and/or a mechanical failure of the leachate return system.
Identification of a significant difference in groundwater indicator parameters	Low	Low	Prolonged periods of heavy rain.
Acts of vandalism	Low	Medium	Increased risk during hours of closure.

5.0 Incident Reporting

5.1 Fire Control

Council shall comply with all requirements of the POEO Act.

In the event of a fire occurring at the site Council shall take prompt action to extinguish the fire. The local Fire Brigade shall be immediately notified of all fires irrespective of the extent of the fire and whether or not it has been controlled.

In addition, the OEHL must immediately be notified by phone on 131 555 and in writing within 7 days of the date on which the fire occurred.

The following details must be recorded for all fire events and for each day that the fire is burning.

- The time and date when the fire started;
- Whether the fire was authorised and if not, the circumstances which ignited the fire;
- The time and date that the fire burnt out or was extinguished;
- The location of the fire (e.g. clean timber stockpile, putrescibles cell, etc.);
- Observations made in regard to smoke direction and dispersion;
- The amount of waste that was combusted by the fire;
- Action taken to extinguish the fire; and
- Action taken to prevent a reoccurrence.

In the event of a surface fire occurring at the site, water and/or earth shall be used as appropriate to extinguish the fire. Underground fires shall be treated on a case by case basis, but it will normally be necessary to excavate and spread the smouldering material and then smother it with earth or water.

A water tanker capable of being used for fire fighting, as well as dust suppression, shall be provided on site at all times and maintained in a proper working order.

6.0 Communicating with the Community

The following mechanisms appropriate to the circumstances may be adopted to notify and update the surrounding community of an incident, and would be undertaken following consultation with the relevant agencies and specialist advice:

- Telephone calls or doorknocking (where appropriate)
- Local media sources
- Upper Lachlan Shire Council Website www.upperlachlan.local-e.nsw.gov.au

7.0 Contact Information

If you suspect an incident has occurred as a result of Council activity, please contact Council immediately on (02) 4830 1000.

7.1 Contact Details

RELEVANT AUTHORITY	PHONE NUMBER
Upper Lachlan Shire Council	02 4830 1000 (office hours) 0429 786 659 (after hours)
EPA – Pollution Line	131 555 (24 hours)
WorkCover NSW	131 050 (24 hours)
Ministry of Health - Public Health Unit Goulburn	02 4824 1840 (office hours) 02 6080 8900 (after hours)
Fire & Rescue	000
Rural Fire Service	000

Where adequate resources are available for concurrent notification and immediate response and immediate response to an environmental incident, notification to the relevant Authorities must be given immediately. The following information should be given when notifying relevant authorities:

- The time, date, nature, duration and location of the incident;
- The location of the place where the pollution is occurring or likely to occur;
- The nature, estimated quantity or volume and the concentration of any pollutants involved;
- The circumstances of which the incident occurred;
- The action(s) taken or proposed to deal with the incident and any resulting pollution or threatened pollution; and
- Any other information requested by the Authority.

8.0 Terms and Definitions

Term	Description
EPA	Environmental Protection Authority
EPL	Environmental Protection Licence
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
Pollution Incident	Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of substance, as a result of which pollution has occurred, is occurring or likely to occur.
Notifiable Incident	A pollution causing incident causing or threatening material harm (actual or potential harm to the safety of human beings or the ecosystems that is not trivial, or results in actual or potential loss or property damage of an amount, exceeding \$10,000.00).
Relevant Authority	Environment Protection Authority, NSW Health (Public Health Unit), WorkCover, Upper Lachlan Shire Council, Fire Rescue NSW
OEH	Office of Environment and Heritage