

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

**Corowa Garbage Depot
Albury Road, Corowa
License No 5901**

VERSION	DATE	BY
1-0	10/03/2020	TR
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(Appendices are not available on Public Version of Pollution Incident Response Management Plan)

1. Purpose

This Pollution Incident Response Management Plan (PIRMP), has been prepared as a requirement of the Protection of the Environment Legislation Amendment Act 2011 Section 153C and the *Protection of the Environment Operations Act 1997* (the POEO Act) Part 5.7A.

The objectives of the PIRMP are to:

Ensure timely and comprehensive communication about a pollution incident to staff at the Site, the Environment Protection Authority (EPA), other relevant authorities specified in the POEO Act 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; and

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, appropriateness and currency.

The PIRMP provides communication and community notification protocols for the reporting of pollution incidents and the procedures for implementing and testing of the plan itself.

Council acknowledges that, due to inherited legacy issues and resource constraints, not all aspects of this procedure may be practicably achieved in the short to medium term. This document provides guidance towards operational improvements for best practice landfill management.

2. Environment Protection Licence Details

Federation Council (FC) holds an Environment Protection Licence (No. 5901) with the NSW Environment Protection Authority (EPA) for Corowa Garbage Depot for waste disposal by application to land.

Under the POEO Act, FC must, keep, test and implement this PIRMP in relation to its licensed waste disposal activities.

If a pollution incident occurs in the course of activities at the facility so that material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement this PIRMP.

Under section 147 of the POEO Act, material harm to the environment includes on-site harm, as well as harm to the environment beyond the premises.

- 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, 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.

A 'pollution incident' includes a leak, spill or escape of a substance, or circumstances in which this is likely to occur.

A written copy of this plan must be kept at the Corowa Garbage Depot and be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan.

3. Procedures in Notifying an Incident

If the incident presents an *immediate* threat to human health or property call “000” immediately. The person initially reporting the incident is to then immediately contact FC’s Manager Operations who will then follow the procedure to notify the relevant authorities about the pollution incident.

- a) In the event of any pollution incident, site personnel must notify their supervisor immediately (promptly and without delay), who will then contact FC’s Manager Operations.
- b) In the event of after-hours pollution incidents, external emergency Agencies are to immediately inform FC’s after hours call out officers via the standard office FC number (02 6033 8999) which diverts to their mobiles. After hours call out officers are to immediately inform the Manager Operations or the Director Environment.
- c) The Manager Operations reports all pollution incidents to the Relevant Authorities immediately when a pollution incident has been identified as having or as likely to occur.
- d) The Manager Operations will notify relevant authorities in the following order:

Contact Point	Contact Number
EPA	131 555
Public Health Unit - Local Office	02 6080 8900 (24hours) – ask for Environmental Health Officer on call from the Public Health Unit if phoning A/H
Safe Work NSW (work cover)	13 10 50
Fire & Rescue NSW (if “000” was not called initially)	1300 729 579
Rural Fire Service	0498 979 669 (Lindsay Bush)
Neighbours and anyone directly affected or likely to be affected	

Contact Details are detailed in Appendix D (not available in public version of this PIRMP).

Reference: 20/12002

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4. Information to be Provided in Notifying an Incident to Authorities

- a) Time, date, nature, duration and location of the incident;
- b) Location of the place where pollution is occurring or is likely to occur;
- c) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- d) Circumstances in which the incident occurred (including the cause of the incident, if known);
- e) Actions taken or proposed actions to be taken to address the incident and mitigate any resulting pollution or threatened pollution, if known; and
- f) Other information prescribed by the regulations.

Official Incident Reporting:

- a) FC Incident Reporting:

The Manager Operations is to record actions ((a) – e)) and outcomes of the incident in FC's centralized Incident Reporting Register within seven days of the incident occurring.

- b) EPA Reporting:

Within seven days of the incident, FC must provide a written report on the incident as per the conditions R2 (environmental harm) and R4 (other reporting e.g. fire) of the Site License, to the EPA.

5. Communicating with Neighbours and Community

All information that is communicated to external stakeholders must be authorised by the Manager Operations and/or the General Manager.

Decisions to notify neighbours and the local community will be made in consultation with regulatory authorities.

Stakeholders that may require notification include:

- Neighbours;
- Local landowners and community representatives;
- Employees and family members; and
- Insurers and lawyers.

Methods of Communication to the Community include:

- Telephone calls;
- Personal visits; or
- Other (in communication with the General Manager).

Contact Details for neighbouring properties are detailed in Appendix D (not available in public version of this PIRMP).

6. Early Warning and Updating

Where owners and occupiers of premises in the neighbourhood are at risk of impact from an incident, then warnings will be issued as soon as information is available.

Updates to the information will be made according to the circumstances but frequently enough for affected parties to take appropriate action. This will be hourly if it affects accommodation or access arrangements or daily if the incident is ongoing with containment difficulties. Communication will be via telephone call unless other form of communication is requested.

7. Coordination

Agencies on the contact list have different roles. The **incident coordinator** will be the **Federation Council** (FC) who will take direction from the EPA. Fire and Rescue will control the site if there is a danger to persons and property and until this danger is eliminated. The agencies should be coordinated and used as follows:

- a) Emergency Services (000) – Police, Ambulance, Fire and Rescue
Responsible for initial action on any emergency. When asked by the “000” telephone receptionist which service is required the criteria is:
 - a. Police – if illegal activity evident or damage to person or property
 - b. Ambulance – if injury to persons
 - c. Fire and Rescue – if fire exists or is possible, or if chemical or radiation contamination of the environment exists or is possible.
- b) The EPA (131 555) is responsible for all pollution incidents, including water, air or noise pollution or pollution that causes or threatens to cause material harm to threatened or endangered animals or plants, under this license. Any instructions from the EPA are to be followed.
- c) The Health NSW is to be advised once the initial incident is under control or sooner if necessary, to determine the proper course of action relating to public health.
- d) SafeWork NSW investigates workplace incidents and enforces work health and safety laws in NSW.
- e) FC is the licensed authority whose duty it is to repair, fix, mitigate or control any failure of its infrastructure, plant or equipment which has caused the incident.

8. Action to Control Pollution

The following information details the action to be taken during and after a pollution incident.

In the event of a pollution incident:

The Gatehouse Attendant/Technical Waste Officer at the pollution incident, where safe to do so, will initiate a response to ensure any immediate threat to human health and environment is reduced. This will include, and not be limited to, removing surrounding people from the incident area;

The Gatehouse Attendant/Technical Waste Officer is to ensure all members of the public in the immediate area are removed from any possible danger and asked to proceed to the dedicated muster point i.e. Gatehouse;

The nature of the incident should be established to whether it is fire, spill or other; and

The Technical Waste Officer will initiate spill containment measures appropriate to the pollution at the instruction of the Manager Operations.

8.1. Low Risk Incident

Examples of low risk incidents include: Uncontained asbestos in waste stream, soil pollution incident, landfill gas levels above guidelines.

If the incident is a localised low risk incident, the Technical Waste Officer is to assign appropriately trained staff or contractors to address the incident. The area is to be cordoned off with signage and hi-visibility markers.

8.2. Medium Risk Incident

Examples of medium risk incidents include: Landfill fire resulting in non-hazardous smoke, accumulation of landfill gas in confined spaces, fuel, chemical or oil spill, excessive dust emitted to the air.

Such incidents require site evacuation. The Gatehouse Attendant/Technical Waste Officer is to manage the following:

Site evacuation to the Dedicated Muster Point;

All staff on site must follow the evacuation procedure and direct the public to the muster point and the Gatehouse Attendant/Technical Waste Officer is to ensure that no one is left on site;

The site is to be closed and signage placed to restrict public entry to the facility.

8.3. High Risk Incident

Examples of high-risk incidents include: Landfill fire resulting in the production of hazardous smoke, ignition of accumulated landfill gas, excessive impurities, pathogens, and/or toxins emitted to the air.

Such incidents require site evacuation and adjacent community consultation. The Gatehouse Attendant/Technical Waste Officer is to manage the following:

Site evacuation to the Dedicated Muster Point;

All staff on site must follow the evacuation procedure and direct the public to the muster point and the Gatehouse Attendant/Technical Waste Officer is to ensure that no one is left on site;

The site is to be closed and signage placed to restrict public entry to the facility.

Once emergency services have the incident under control, access to the site will be at the direction of the Manager Operations.

8.4. Risk Minimisation

The following table provides guidance on how to minimise the risk of exposure during the incident response.

Reference: 20/12002

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Incident	Directions
Fire	Refer to Fire Management and Risk Register Standard Operating Procedure (SOP) within the Landfill Procedure Manual
Chemical spill	<p>Wear PPE;</p> <p>Visual inspection of incident and chemical involved;</p> <p>Determine if the spill can be safely contained by staff on site and that it will not enter any drains;</p> <p>Where no immediate safety hazard exists read the MSDS for the spill clean-up information;</p> <p>Where safe to do so, isolate spilled material with spill kit, place material into hazardous waste storage bags using a shovel and clean all equipment used;</p> <p>For larger spills, FC onsite / offsite plant equipment will be used to move soil to bund and prevent the pollution moving towards waterways;</p> <p>Move contaminated soil into a banded stockpile and where practical move to a sealed surface or stockpile and cover;</p> <p>Send soil samples to laboratory for testing to determine if the material is suitable for disposal on site or at another site; and</p> <p>A hazardous waste contractor may be called to dispose of the chemical waste.</p>
Oil spill	<p>Determine the nature, amount and location of the oil spill;</p> <p>Determine if the oil spill can be safely contained by staff on site and that it will not enter any drains;</p> <p>Arrange and install traffic control if required;</p> <p>Where safe to do so isolate spilled oil with spill kit, place material into hazardous waste storage bags using a shovel and clean all equipment used;</p> <p>For larger spills, where safe to do so, utilise on site machinery to place sand to prevent liquid migration into drains and to clean up spilled oil.</p>

8.5. Clean-up Procedures

All persons without PPE to be kept outside incident area;

When a pollution incident has been stabilised and any immediate threat to human health and the environment has been mitigated, clean-up of the polluting material will be required. The MSDS for each chemical stored on site provides clean-up instructions.

The environmental protection licence for the site specifies the waste that can be accepted. If the polluting material is unacceptable under the license, it is to be disposed of by an appropriate contractor licensed to handle the material.

If the waste is suitable to be disposed of on-site standard waste disposal practices will need to be maintained.

8.6. Staff Training

The objectives of staff training in relation to the PIRMP are to minimise harm to responders, the community and the environment and provide a timely and competent response to the incident.

All FC staff attending the Site regarding the pollution incident response shall have previously undertaken a Site induction by the Technical Waste Officer which has been recorded in the Induction Register in accordance with the procedures outlined in the Landfill Procedure Manual – Corowa Garbage Depot. This register is located at the Site gatehouse.

All external emergency personnel are to be actively supervised by the Technical Waste Officer or Manager Operations with the exceptions of after-hour callouts.

9. Safety Equipment

The following equipment is to be permanently available and maintained in good condition at the facility:

- Portable Fire Extinguishers (AS 1851);
- Fire blankets (AS 1851);
- First Aid Kit;
- Spill kit;
- Disposable overalls;
- Rubber gloves;
- Gumboots;
- Safety glasses;
- Hearing protection; and
- Gas monitor.

All persons without PPE to be kept outside incident area.

10. PIRMP Management

The PIRMP will be tested every 12 months and within 1 month of any pollution incident.

Testing will incorporate the following:

- Risk assessments review;
- Pollutants review;
- Contact details reviewed and updated;
- Equipment and PPE testing;
- Spill response kit quantities check; and
- Communications testing e.g. batteries for handheld devices.

An example of the PIRMP testing template is shown below.

PIRMP Testing Template

Date	Name	Brief Description of Testing Task	Findings	Next Scheduled Testing Date
	Include the names of all people involved in testing	Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan	Finding of test including issues identified	Must be within 12months from current test
		e.g. Desktop Simulation – chemical spill	e.g. Contact details, map and pollutant inventory out of date	

Information will be updated as necessary when the PIRMP is tested or, if necessary, within one month following a pollution incident to ensure it is capable of being implemented in a workable and effective manner.

An example of the PIRMP Update Template is shown below.

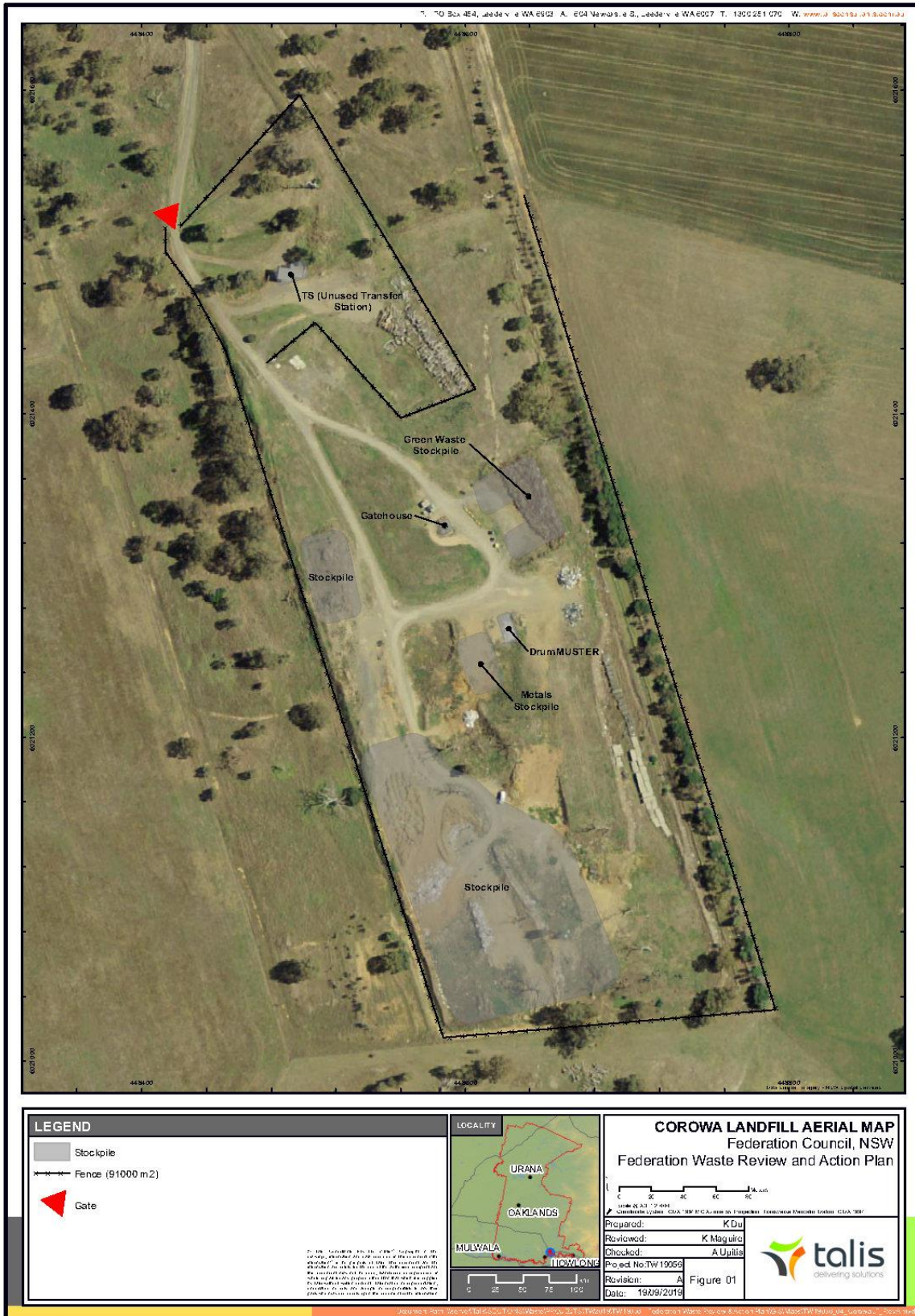
PIRMP UPDATE Template

Date	Reason for Update	Details of Update	Date Uploaded to Website	Date Completed
	Address issues identified in testing, contact details/personnel have changed)	Nature of changes to PIRMP		
	e.g. Outdated items identified in annual testing	e.g. Contact details, map and pollutant inventory updated		

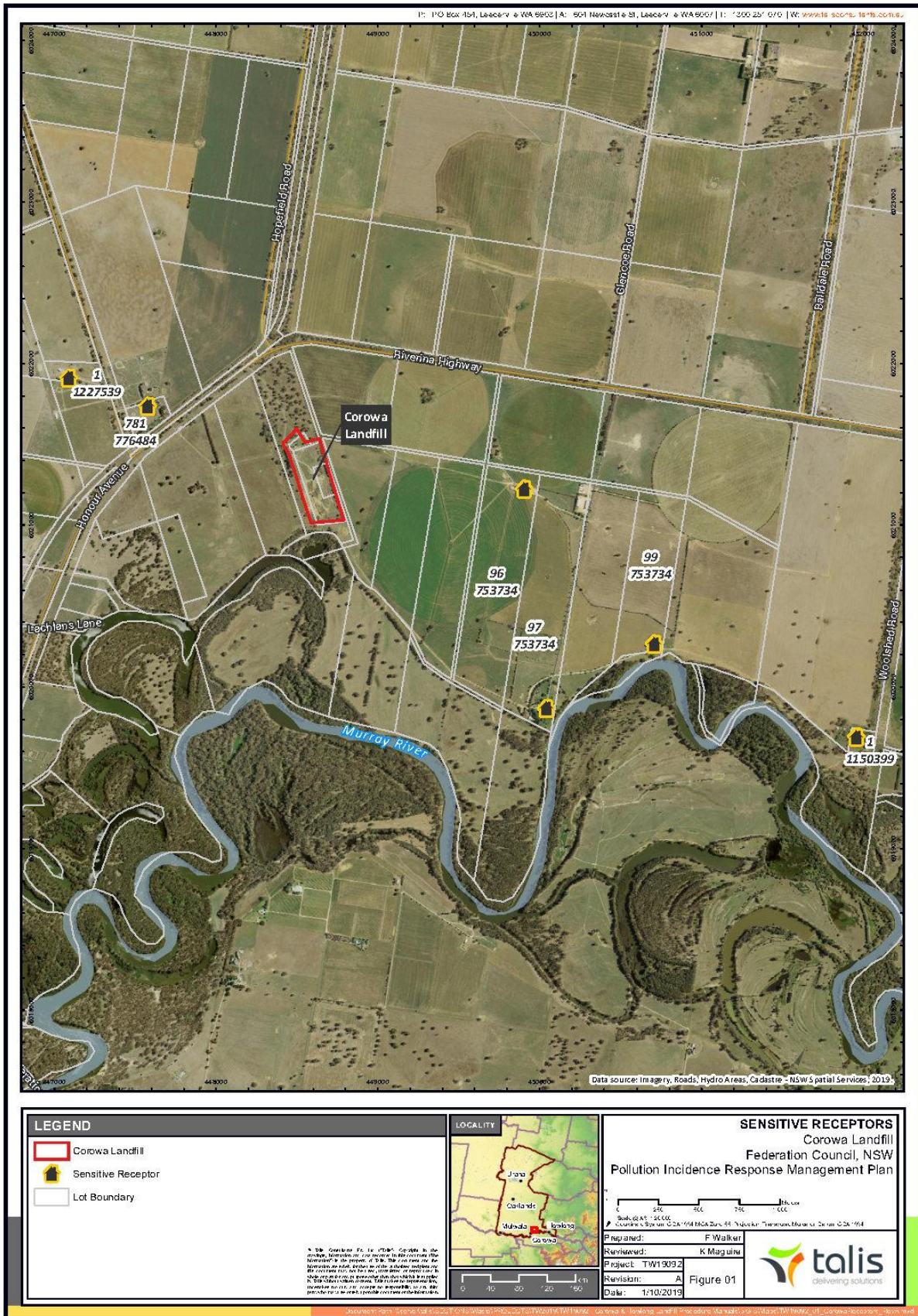
Appendix A: Staff Training Register

The staff training register is held in Councils HR Department, please contact Emma Gray for further information emma.gray@federationcouncil.nsw.gov.au

Appendix B: Map Corowa Landfill



Appendix C: Map Site Neighbours



Appendix D: Contact Details

Notification Protocol

EPA	131 555 – Hotline 24 hours 0427 223 516 – Craig Bretherton
Department of Health	02 6080 8900 – Hotline 24 hours
Safe Work NSW (work cover)	13 10 50 – Hotline 24 hours 02 6042 4600 – Office hours only
Federation Council	02 6033 8999 – Office hours only 02 6033 8999 – After hours emergency diversion
Manager Operations	0436 409 201 – Tony Rintala

Interested Parties

Water NSW	02 6024 8880 – Office hours only
NSW Fisheries	02 6042 4200 – Office hours only 1800 043 536 - Hotline 24 hours
North East Water	1300 361 644
Indigo Shire Council	1300 365 003 – Office hours only 0448 321 386 – Hotline 24 hours

Emergency

Police	000 - 02 6033 1144 Corowa Police
Ambulance	000 – 131 233
Fire and Rescue	000 - 1300 729 579
Rural Fire Service	0498 979 669 Lindsay Bush
SES	132 500 0427 261 512 /02 6033 2299 Jim Wallis
VRA Search & Rescue Corowa	0419 312 928 /02 6033 2588 Peter Wright 0427 288 633 /02 6033 2730 Alan Robb

Neighbors Contact List

Lot No	Owners	Street Address	Postal Address	Phone No.	Alternate
Lot 1 DP1227539	Darren John Toy; Lee Toy	Honeysuckle Homestead, 6897 Riverina Hwy, Hopefield	6897 Riverina Highway, Hopefield NSW 2646	0474 449 936	peacedonkeys@gmail
Lot 781 DP776484	Heinrich Gerhard Deiter	Honeysuckle Homestead, 6880 Riverina Hwy, Hopefield	6880 Riverina Highway, Hopefield NSW 2646	02 6033 0839	02 6033 3660
Lot 96 DP753734	Allhill Pty Ltd	Quat Quatta, Riverina Hwy, Corowa	C/- I Mandie, 7 Trawalla Avenue, Toorak 3142	0408 990 626	03 9872 2522
Lot 97 DP753734	Allhill Pty Ltd	Quat Quatta, Riverina Hwy, Corowa	C/- I Mandie, 7 Trawalla Avenue, Toorak 3142	0408 990 626	039872 2522
Lot 99 DP753734	Allhill Pty Ltd	Quat Quatta, Riverina Hwy, Corowa	C/- I Mandie, 7 Trawalla Avenue, Toorak 3142	0408 990 626	039872 2522
Lot 1 DP1150399	Allhill Pty Ltd	184 Woolshed Rd, Hopefield	C/- I Mandie, 7 Trawalla Avenue, Toorak 3142	0408 990 626	039872 2522

