



Cowra
Council

April 2023

PIRMP

Pollution Incident Response
Management Plan

Glenlogan Road
Landfill &
Material
Recycling
Facility
(GRLMRF) or
(MRF)

EPL 6435

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I. INTRODUCTION

This is the Supporting Statement for the Pollution Incident Response Management Plan (PIRMP). The PIRMP is a functional document. It is designed to assist personnel at the Glenlogan Road Landfill and Materials Recycling Facility (GRLMRF) to correctly identify pollution incidents and detail the procedures for the response and reporting of a pollution incident.

The PIRMP reflects the requirements of the Environmental Protection Authority's Guidelines: *Preparation of pollution incident response management plans, March 2012*.

Utilisation of this PIRMP aims to improve, monitor and demonstrate environmental performance.

I.1 PURPOSE

PIRMP have been prepared in accordance with the *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)* and reflects the requirements specified in the Environment Protection Authority's (EPA's) *Guidelines: Preparation of pollution incident response management plans, March 2012*.

The PIRMP details:

- Procedures for notifying a pollution incident to relevant persons;
- Actions to be taken to reduce and/or control pollution; and
- Procedures for co-ordinating those notified and any action taken in combating the pollution.

I.2 DEFINITION OF POLLUTION INCIDENT

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 1997*:

"(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."

I.3 IDENTIFIED POLLUTION INCIDENT RISKS

The primary potential hazards to human health or the environment associated with the activity undertaken at this site – i.e. 'Pollution Incidents' - include the following:

- Identifying non-domestic quantities (more than 200 millimetres per tonne or 200 grams per tonne) of hazardous substances among waste;
- Surface or subsurface fires;
- Mixing of leachate and stormwater or waste and stormwater;
- Identification of any failure of an environmental protection system;
- Identification of a significant difference in groundwater indicator parameters;
- Detection of gas at the subsurface, surface and/or accumulated within buildings at greater than 1.25 per cent methane (volume for volume);
- Acts of vandalism or target of terrorist activity; or
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

2. SITE OVERVIEW

The Glenlogan Road Landfill and Materials and Recycling Facility (GRLMRF or the facility) has been operating intermittently for the disposal of domestic and municipal refuse since 1988. The 42.11 hectare property is owned by Cowra Shire Council. It is estimated that the site has an 80 year lifespan.

The GRLMRF currently operates under the Council of the Shire of Cowra approval, issued 17 March 1987 (No.10/87).

The Environment Protection Authority (EPA) has issued Environment Protection Licence 6435 in accordance with *Section 5.7 of the Protection of the Environment Operations Act 1997*. The licence requires that the total quantity of waste disposed at the premises must not exceed 10,000 tonnes per annum.

As a condition of the licence, a Landfill Environmental Management Plan (LEMP) was prepared, which details the procedures to manage and operate the GRLMRF to meet the relevant Environmental Goals specified in the *Environment Protection Authority's Environmental Guidelines: Solid Waste Landfills, 1996*. Second edition 2016.

The GRLMRF is a **Class I Solid Waste Landfill**. The facility accepts solid wastes including Putrescibles wastes and other wastes approved by the EPA. The facility may also receive inert waste.

Excluded waste types are detailed in **Section 2.4**.

2.1 SITE CHARACTERISTICS

The GRLMRF is located approximately 2 km north-west of Cowra.

It comprises Lot 1 DP 733574.

The area surrounding the facility to the north, east, west and south is predominantly rural pasture land. A commercial quarry and vineyard exist to the south-west, on the opposite side of the Dermondville to Blayney Rail Line. A dog pound operated by Council is situated on land directly west and adjacent to the site entrance.

The nearest residential property to the facility is located approximately 450m from the south-eastern corner of the boundary.

Access to the GRLMRF is via the Glenlogan Road. Glenlogan Road is a two lane sealed road. From Glenlogan Road the facility is accessed by a primary sealed road. Within the site, sealed roads and formed gravel access roads lead to the various defined tipping areas and processing pads. The southwest portion of the site is currently used for landfilling with weighbridge and receivable areas, Materials Recycling Facility (MRF) and maintenance sheds located close to the site entrance to the north-east.

The GRLMRF is fenced along all boundaries with 1.2m chain mesh fence. In addition, a 1.8m chain mesh security fence separates the MRF, maintenance sheds, public areas, the weighbridge and receivable station from the wider site and active landfill cell.

Previous and current land filling practices have altered the local topography significantly, creating numerous rises, as such, the current landfill area no longer retains the natural topography but is designed to channel surface water and minimise off-site impact of the landfill operations.

2.2 MAP INFORMATION

The site topography and drainage have been engineered to ensure that there is negligible stormwater runoff into and out of the site, thus minimising any off-site impact. Site generated surface water is channelled around the edge of the premises towards the onsite collection pond in the south east Corner.

When the surface water pond reaches capacity, water filters south-west over vegetated ground and along a small perennial creek which exits the site via a culvert beneath the railway line to the south. Outside the site, natural topography to the north of the facility boundary drains along a system of Gully's and stormwater dams. Under normal conditions the gullies are dry.

The GRLMRF is 1.5km north-east and up gradient of the Lachlan River which is the nearest major water course. Groundwater, surface water and leachate is routinely monitored through a system of seven piezometers at seven locations around the landfill.

There is limited remnant natural vegetation over the site.

There are some mature trees along the rear of the public receivable/MRF and green waste areas and this acts as visual and wind buffers. The central capped areas of the landfill have been revegetated with a perennial grass mix.

2.3 SITE SUPERVISION AND CONTROL

The GRLMRF is open to the public between 7:30 am and 4:00 pm Tuesday to Friday and 8:30am and 5:00pm Saturday and Sunday. The facility operates on Mondays but is not open to the public. The site is closed on Good Friday and Christmas Day. Access to the site outside these hours (e.g. for special circumstances and emergency waste disposal) is subject to the approval of the Waste Operations Supervisor.

Waste deposited in the active landfill cell is immediately spread and compacted and is lightly covered with soil at the end of daily operations. The cover material is sourced from excavation of adjacent cells.

GRLMRF is supervised at all times when open for the receipt of waste. The facility is staffed by qualified and experienced personnel. These include a Waste Operations Supervisor and up to two Site Operators. Two Site Operators are generally present during normal operation. Lockable security gates are in place at the access point to the facility. All gates are locked outside the specified opening hours except for when approved by the Waste Operations Supervisor in special circumstances. The site is also monitored by CCTV with one camera on the weighbridge looking towards Glenlogan Road. Security patrols are conducted two to three times per night, alarmed doors are checked and a site patrol conducted to prevent vandalism. All vehicles are directed to the weighbridge upon entry to the facility, and distributed appropriately according to waste type. Council maintains the sealed access road from the facility entry to the waste receipt area. Council staff are responsible for internal traffic control. All public vehicles and loads are directed to disposal skips in the Public Receipt Area. Council garbage trucks are, after being weighed on the weighbridge, directed to the active landfill face and/or operating site for the waste item in question. A daily checklist for monitoring, recording activities and incidents that occur during operation of the facility is kept by the Site Supervisor.

No members of the public are permitted to scavenge at the active tip face or in any waste drop-off area.

Over 100 kilograms or 10 square meters of asbestos waste to transport to the waste facility will require the person transporting the load to have a unique consignment number and report it to the EPA using Wastelocate. wastelocate.epa.nsw.gov.au. Any asbestos received is currently triple wrapped and sealed before acceptance. It is then taken to the active and lined tipping face of the landfill and immediately covered with waste or soil. A separate asbestos pit is planned for the near future and it is intended that any such material will be triple wrapped before deposition.

2.4 EXCLUDED WASTES

The GRLMRF does not accept the following types of wastes:

- Liquid trade wastes of any description;
- Radioactive material, sharps (unless they are in appropriate sharps containers), cytotoxic waste, bulk blood, body fluids, recognisable body parts, infectious waste, microbiological and pathological wastes, laboratory chemicals, poisons and pharmaceutical waste;
- Any sludge or material (unless proven to be innocuous or harmless) being the refuse from any industrial process carried out in any tanning or leather processing plant, any petroleum or petrochemical plant, any chemical plant, any metal treatment plant, any paint manufacturing plant;
- Any material containing arsenic, cyanide or sulphide;
- Any toxic soluble salt of barium, boron, cadmium, chromium, copper, lead, manganese, mercury, selenium, silver, zinc;
- Any soluble acid or alkali, acidic or basic compounds.

If an excluded waste was to be discovered on the site, the Waste Operations Supervisor would be notified immediately. If it is considered hazardous, depending on its composition, it would be first moved to a more secure and isolated location. The EPA would then be contacted and Council would then await their instruction. The incident is recorded on the daily checklist kept by the Waste Operations Supervisor. If the waste is leaking, the local fire brigade would be contacted and requested to bring a drum for the containment of hazardous materials. Any of the above wastes may only be disposed of at the GRLMRF following EPA approval. The excluded waste is recorded on the Daily Checklist including details of the type of waste, the source of waste and vehicle and driver identification.

2.5 SITE SAFETY EQUIPMENT

The GRLMRF maintains a water cart which consists of a 1,500 litre tank, pump and hose. This can be mobilised immediately to the site of a fire as and when required. The MRF building is protected from fire by several hose reels, fire extinguishers and hydrants, and there are three fire hoses in the public receivable area.

To manage leaks, chemicals such as diesel fuel are kept on mobile self-bunded trolleys to allow their safe use in less well protected areas of the site. Spill Sorb is present on site to manage fuel and oil spills. The used Spill Sorb is then deposited in the landfill. In the event of a chemical spill, PPE is provided for onsite staff which consists of safety goggles, respirator face masks and protective gloves.

3 RISK MANAGEMENT AND PRE-EMPTIVE ACTIONS

3.1 INTRODUCTION

The following section outlines current operational procedures and design intended to minimise and manage risk. Members of staff working on site are responsible for being aware and notifying the Site Supervisor of any potential pollution incidents on the premises. All management procedures detailed within the LEMP must be adhered to.

3.2 PRE-EMPTIVE ACTIONS

3.2.1 IDENTIFYING NON-DOMESTIC QUANTITIES OF HAZARDOUS SUBSTANCES

The following practices apply to screening of incoming wastes:

- Public access is only permitted during opening hours;
- Drivers are asked to describe the type of waste to be deposited on entry to the facility;
- Inspections of waste loads are made when required;
- Drivers are directed to the correct area of the facility for disposal of specific loads (e.g. builder's wastes, greens, whitegoods, tyres etc.);

- Wastes are monitored and inspected as they are being discharged to ensure excluded non-approved wastes are not being disposed; and
 - Wastes are monitored and inspected during spreading, compaction and covering.
- The following steps are undertaken if non-domestic quantities of hazardous wastes are identified:
- If identified **at point of entry** the vehicle is refused entry and the driver advised to contact the EPA for advice on proper disposal of the hazardous waste. The incident is reported as described in **Section 2.4**.
 - If identified **during waste deposition** the Site Operators immediately advise the Waste Operations Supervisor. The supervisor advises the driver that the waste is not acceptable and organises for the waste to be loaded back onto the vehicle, where practicable and safe to do so. The supervisor then escorts the load off-site and advises the driver to contact the EPA for advice in the proper disposal of the excluded waste. The incident is reported as described in **Section 2.4**; and
 - If identified **during waste spreading and compaction** the Site Operators immediately notify the Waste Operations Supervisor. The supervisor makes all practicable efforts to identify the source of the waste (e.g. labelling, waste type). The supervisor is then responsible for contacting the EPA for advice on the proper disposal of the hazardous waste and will dispose of the hazardous waste in accordance with the EPA's requirements. In the event that the EPA cannot be contacted, the wastes will be relocated to a more secure and isolated location. The incident is reported as described in **Section 2.4**.

3.2.2 SURFACE OR SUBSURFACE FIRES

The potential for fires to occur at the site are controlled by:

- A security fence to prevent unauthorised access and acts of vandalism;
- Maintaining machinery in good working order to minimise risk of sparks;
- Smothering immediately with soil or water sprayed from the water cart;
- Adequately compacting and covering waste;
- Mulched green waste has the capacity to spontaneously combust. This risk is minimised via shaping into divided windrows (i.e. small cones) to isolate/contain any fires;
- Litter patrols as required;
- Ensuring fire breaks are maintained around any temporary stockpile of combustibles;
- Access to on-site fire fighting equipment; and
- Accepting only permitted wastes.

In addition to the above preventative measures, operators at the facility maintain the fire fighting equipment to ensure that the on-site fire fighting capability is maintained. Specifically this involves:

- Ensuring that the water cart permanently located at the facility is full at all times and that it is positioned in a readily accessible location; and
- Weekly testing of the tanker pump and checks that the motor is topped with fuel and oil.

3.2.3 MIXING OF LEACHATE AND STORMWATER OR WASTE AND STORMWATER

The potential for the mixing of leachate and stormwater or waste and stormwater is controlled by ensuring that the level of the leachate ponds is regularly checked. If the level of a pond is too high and at risk of flooding then the excess water is pumped back onto the active landfill site to create airspace.

3.2.4 DETECTION OF SUBSURFACE GAS, SURFACE GAS AND/OR ACCUMULATED GAS IN BUILDINGS

Any buildings which are built within the site are designed so as not to accumulate methane gas.

3.2.5 ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY

The boundary road fence along Glenlogan Road limits unauthorised access outside operational hours. CCTV is installed and after hours security patrols are undertaken as a deterrent. All staff are required to be vigilant and aware that the site is a potential target for vandalism, particularly by arsonists.

3.3 INVENTORY OF MAINTENANCE POLLUTANTS

The following pollutants can be stored on site in quantities required for routine maintenance necessary for operations at the facility:

- Roundup;
- Engine Oil; and
- Diesel.

Attached site plan provides details of where these chemicals are stored on the premises as well as those on banded palettes.

3.4 IDENTIFIABLE WASTE POLLUTANTS

A variety of waste household pollutants are collected annually by NetWaste from households. Attached site plan provides details of where hazardous household waste items are stored on the premises, including the location of gas cylinders, waste oil, batteries, fluorescent tubes, globes, smoke detectors and clinical waste.

3.5 POTENTIAL POLLUTION INCIDENTS

The potential main hazards to human health or the environment – i.e. ‘*Pollution Incidents*’ – associated with the activity undertaken at this site include the following:

- Identifying non-domestic quantities (more than 200 millimetres per tonne or 200 grams per tonne) of hazardous substances among waste;
- Surface or subsurface fires;
- Mixing of leachate and stormwater or waste and stormwater;
- Identification of any failure of an environmental protection system;
- Identification of a significant difference in groundwater indicator parameters;
- Detection of gas at the subsurface, surface or accumulated within buildings at greater than 1.25 per cent methane (volume for volume);
- Acts of vandalism or target of terrorist activity; or
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

It is possible that dumping of hazardous waste may occur outside the boundary, but in close visual proximity to the GRLMRF outside of normal operational hours. In this instance, if the pollution is a risk of material harm to the environment and/or human health then the local fire brigade should be contacted immediately. The initial response to the pollution and assessment of the situation thereafter will be managed by the local fire brigade.

Refer to **Document A** – Pollution Incident Decision Flow Chart in **Appendix A** for details.

3.6 LIKELIHOOD, IMPACT AND CONTRIBUTING FACTORS TO POLLUTION INCIDENTS OCCURRING

Incidents can be classified as being of low, medium or high risk of occurring (likelihood) based on the past history of the facility, an assessment of management procedures, staff training and site layout. The impact of an incident can be classed as low, medium or high based on the potential extent of offsite harm to humans and/or the environment.

3.6.1 IDENTIFYING NON-DOMESTIC QUANTITIES OF HAZARDOUS SUBSTANCES

Medium Likelihood – Non-domestic quantities of hazardous waste could be discovered at point of entry into the site, during waste deposition, and/or during waste/recycling spreading, sorting and compaction.

Low Impact – The site has a protective system of impermeable lining, drainage, bunding and holding ponds which are likely to contain and prevent the immediate spread of hazardous substances outside of the premises.

Contributing Factors – Human errors made during waste screening.

3.6.2 SURFACE OR SUBSURFACE FIRES

3.6.2.1 Active Landfill, Public Reveal Areas and Recycling Facility

The GRLMRF often deals with the sorting and deposition of combustible waste, coupled with the storage and use of some highly combustible chemicals and fuels.

Medium Likelihood– The likelihood of a fire within the active landfill area is relatively high, for example kerbside collection can include household fire embers and mulch can self combust.

Medium Impact – It is probable that a fire of this nature should be able to be contained due to the procedures and equipment in place. Therefore, the impact is classed as medium.

Contributing Factors – Factors which may increase fire risk include high winds, dry weather, prolonged periods of high temperatures and low humidity, spontaneous combustion and hot embers in waste deliveries. Human errors made during waste screening and the poor maintenance of plant and equipment may spark a fire.

3.6.2.2 Maintenance and Inactive Areas

Low Likelihood – The storage of potential accelerants such as maintenance chemicals and fuels is undertaken on-site, however as these are located in secure facilities and only utilised by trained staff, the risk is considered minimal.

High Impact – If a fire were to initiate within the chemical storage areas, or in an inactive area of the site, there is a high risk of spread off-site and to susceptible surrounding open pasture and wooded areas.

Contributing Factors – Factors which may increase fire risk include high winds, dry weather, prolonged periods of high temperatures and low humidity.

3.6.3 MIXING OF LEACHATE AND STORMWATER OR WASTE AND STORMWATER

Low Likelihood – the site has a protective system of impermeable lining, drainage, bunding and holding ponds which contain surface water, leachate and waste. On-site roads are designed to channel and capture runoff.

Medium Impact – the site has a protective system of impermeable lining, drainage, bunding and holding ponds which are likely to contain and prevent the immediate spread of surface water, leachate and waste outside of the premises. However the impact is considered to be medium due to the ability of surface run-off to leave the site along an existing creek system in the south-west corner. Any pollutants which reach the creek could cause harm to properties and environmental habitats for some distance downstream especially if they were to enter the Lachlan River.

Contributing Factors –Prolonged periods of heavy rain and lack of surface water pond and site maintenance may increase risk.

3.6.4 IDENTIFICATION OF ANY FAILURE OF AN ENVIRONMENTAL PROTECTION SYSTEM

Low Likelihood – the site has a protective system of impermeable lining, drainage, bunding and holding ponds, and the surface water, groundwater and leachate of the premises is regularly monitored.

Low Impact – the site has a protective system of impermeable lining, drainage, bunding and holding ponds and the surface water, groundwater and leachate of the premises is regularly monitored which means any failure in this environmental protection system is likely to be identified before there is potential for impact outside of the site.

Contributing Factors – Prolonged periods of heavy rain.

3.6.5 IDENTIFICATION OF A SIGNIFICANT DIFFERENCE IN GROUNDWATER INDICATOR PARAMETERS

Low Likelihood – the site has a protective system of impermeable lining, drainage, bunding and holding ponds, and the surface water, groundwater, surface gas, sub-surface gas and leachate of the premises is regularly monitored.

Low Impact – the site has a protective system of impermeable lining, drainage, bunding and holding ponds and the surface water, groundwater, surface gas, sub-surface gas and leachate of the premises is regularly monitored which means any significant difference in groundwater indicator parameters is likely to be identified well before there is a potential impact outside of the site.

Contributing Factors – Prolonged periods of heavy rain may increase risk.

3.6.6 DETECTION OF SUBSURFACE GAS, SURFACE GAS AND/OR GAS ACCUMULATED IN BUILDINGS

Low Likelihood –the possible build up of subsurface gas, surface gas and gas accumulated in buildings are not monitored at this site as it is not a requirement of the EPL due to the relatively small waste volumes deposited at the site and the correspondingly low volume of methane likely to be produced as a by-product of this decomposing waste.

Low Impact – the possible build up of subsurface gas, surface gas and gas accumulated in buildings are not monitored at this site as it is not a requirement of the EPL.

Contributing Factors – on-site buildings which have not been designed to prevent accumulation of methane gas.

3.6.7 ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY

Low Likelihood – The site is enclosed by secure fencing and monitored by CCTV, and during hours of closure is patrolled by security guards two or three times per night. Although the site is of limited strategic value as a potential target for terrorism, the premises may prove attractive to arsonists as it isolated from habited areas and deals with the sorting and deposition of combustible waste, coupled with the storage and use of often highly combustible chemicals. For example mulch is stockpiled in close proximity to mature trees.

Medium Impact – the site is surrounded by open pasture and wooded areas susceptible to fire, particularly during sustained periods of hot and dry weather.

Contributing Factors –Increased risk during hours of closure.

3.6.8 ANY OTHER INCIDENT OR OBSERVATION THAT COULD POTENTIALLY POSE AN IMMEDIATE ENVIRONMENTAL HAZARD OUTSIDE NORMAL OPERATING CONDITIONS

Low Likelihood – The site has significant environmental protection measures and monitoring schedule.

Low Impact – The site has significant environmental protection measures and monitoring schedule which are likely to contain and prevent the immediate spread of environmental hazards outside the premises even outside of normal operating conditions.

Contributing Factors – N/A.

PIRMP

4.1 DEFINITION OF POLLUTION INCIDENT

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:

“(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

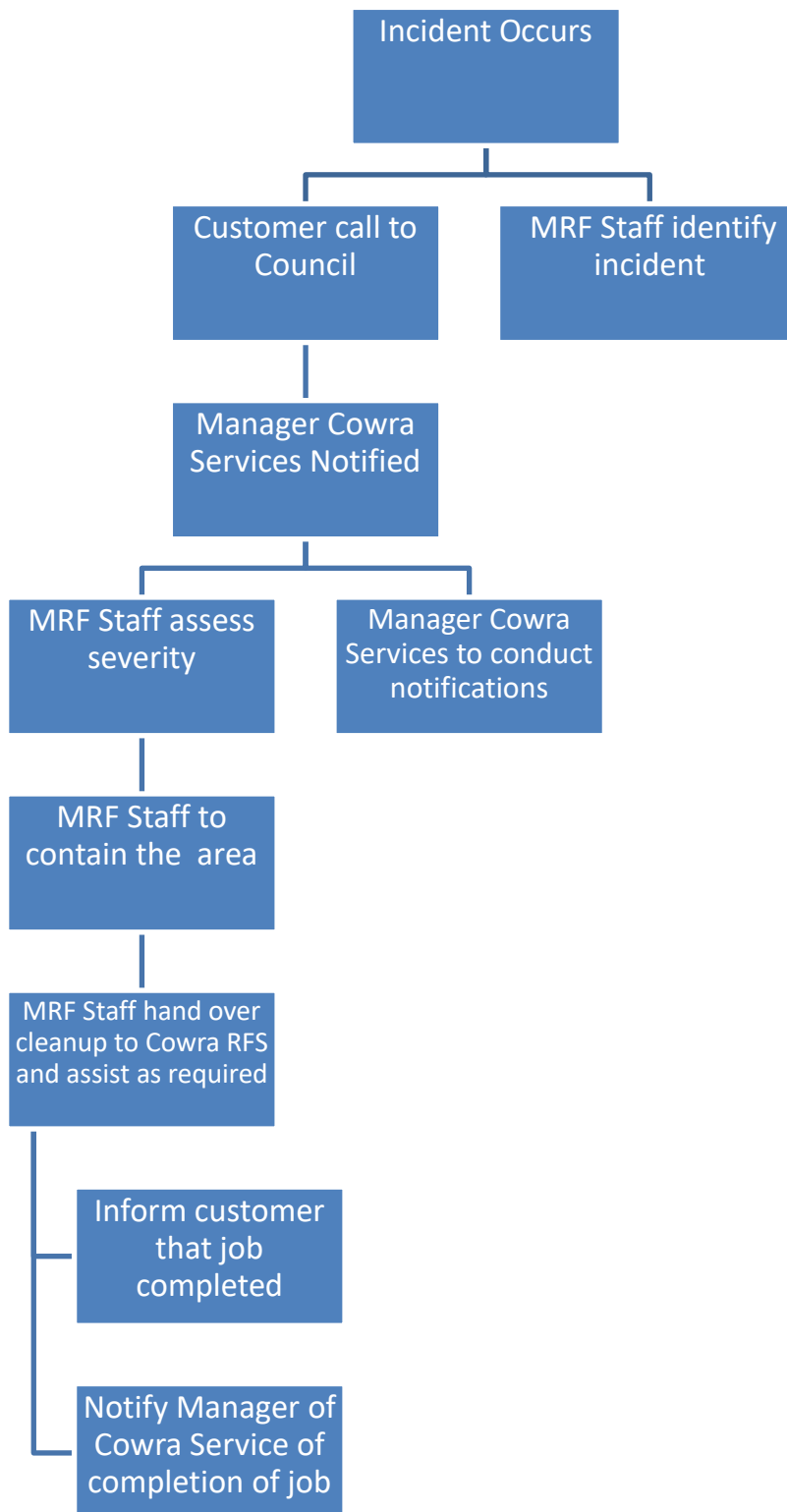
ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

(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.”

4.2 NOTIFICATION OF POLLUTION INCIDENT

4.2.1 NOTIFICATION SPEED OF RESPONSE

The requirement for notification of a pollution incident has changed from ‘*as soon as practicable*’ to ‘*immediately*’. In short, ‘*immediately*’ means ‘*promptly without delay*’, but it does not mean undertaking notification ahead of doing what is necessary to make safe.



4.2.2 NOTIFICATION OF RELEVANT AUTHORITIES

Where the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the Waste Operations Supervisor:

Table 1 Incident Contact Details – Council – Saleyards

| Name | Role | Contact Number |
|---|-----------------------------|-----------------------------|
| Phillipa Childs | Manager – Cowra Services | 6340 2054 0417104586 |
| Anthony Collins | Waste Operations Supervisor | 026340 2140 0428 423 080 |
| Paul Devery | General Manager | 026340 2013 |
| Council Emergency contact number After hours emergency contact | | 0263402000 0419 219 231 |
| Enquires and Complaints | | 0263 402000 |

Table 2 Incident Contact Details – External

| Organisation | Contact Number |
|---|-------------------------|
| Emergency Services | 000 |
| EPA Bathurst Regional Office | 131555 6332 1838 |
| NSW Ministry of Health On Call Public Health Officer Bathurst Regional Office | 0428400526 6339 5601 |
| Safework NSW | 13 10 50 |
| Fire & Rescue NSW Cowra Rural Fire Service | 1300729579 6363 6666 |

4.2.3 RESPONSIBILITIES

In the event of an immediate notification incident responsibilities for incident management are as follows:

Waste Operations Supervisor is responsible for actioning response to the incident.

Manager – Cowra Services is responsible for notifying external authorities, potentially affected community and ensuring adequate resources are available for incident response.

General Manager is responsible for liaising with the media.

The Manager- Cowra Services shall determine the most appropriate means of contacting potentially affected community including:

- Door knocking
- Letterbox drops
- Phone
- Local media
- Signage.

Information provided to the community would depend on the incident but could include:

- Description of the incident
- Status of incident
- Response actions
- Actions to minimise harm
- Likely duration.

As per the EPLs, the licensee must provide written details of the notification to the EPA within seven days of the date on which the incident occurred.

4.2.4 INFORMATION TO BE NOTIFIED

Under section 150 of the *POEO Act 1997*, the information about a pollution incident that must be notified is:

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred, including the cause of the incident, if known;
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and
- Other information prescribed by the regulations.

Notification is required by the Waste Operations Supervisor immediately after a pollution incident becomes known. Any information required that is not known at the time the incident is notified must be provided when it becomes known.

A Pollution Incident Reporting Form is produced in **Appendix A** to assist the Waste Operations Supervisor in correctly recording and notifying the relevant authorities as detailed in **Section 4.2.3** above.

Notification of pollution incidents

For the purposes of section 149 of the Act, a pollution incident that is required to be notified under section 148 of the Act:

- (a) is to be notified verbally to each relevant authority, and*
- (b) is to be followed by notification in writing within 7 days of the date on which the incident occurred.*

For the purposes of section 149 of the Act, notification of the EPA may be achieved by telephoning the EPA environment line. 13 1555

Note. Section 150 (2) of the Act provides that the information contained in a notification is to be the information known when the notification occurs. Therefore, if information becomes known between the immediate notification given verbally and the time when written notification is required to be given, that new information will be required to be notified immediately after it becomes known and to be included in the written notification.

4.3 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

All site personnel with relevant training must make every effort to contain the pollution incident on site, without putting themselves at risk of harm.

In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately. This could be through the use of a fire extinguisher, fire hose, water cart or smothering with cover material.

In the event of a chemical spill that is not contained by bunding, Spill Sorb (or similar) must be used to restrict the spread of the chemical.

If the leachate ponds are nearing capacity, staff must initiate pumping of liquid to the active landfill site to retain airspace. If pollution is identified through groundwater or surface monitoring, procedures as identified in the LEMP will be followed.

4.4 MINIMISING HARM TO PERSONS ON THE PREMISES

In the event of a pollution incident occurring, an emergency alarm will be sounded from inside the MRF. All members of the public and other Council staff will be mustered by Council site staff to the Emergency Assembly Point at the central lawn area/vehicular turning circle of the GRLMRF (identified on **Site Plan**), after which they will be safely evacuated from the site where appropriate. It is a condition of entry that in the event of an emergency, both the public and staff must adhere to directions given by the Site Supervisor.

4.5 EPA POWERS OF DIRECTION & NOTIFICATION OF NEIGHBOURS

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with **Section 4.2**.

Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken in response to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site. Irrespective of whether the EPA directs Council to notify neighbours and depending on the circumstances of the particular pollution incident, Council may at their own discretion voluntarily choose to notify neighbours. Council would notify neighbours by 'door knocking' every neighbouring property identified on attached Site Plan. A summary of the neighbour notification procedure is provided in Document A – Pollution Incident Decision Flow Chart in **Appendix A**.

4.6 IDENTIFICATION OF NEIGHBOURS

To assist the EPA in its decision as to whether it needs to direct Council to notify neighbours and to assist Council in visiting all the local neighbours, enclosed is aerial plan which identifies the commercial, industrial and residential properties within 500m of the site boundary.

5. IMPLEMENTATION

5.1 LEMP

The PIRMP forms part of the *Glenlogan Road Landfill Environmental Management Plan (LEMP)*. It updates **Section 7.5.2 'Reporting of Incidents'** and this Supporting Statement should be filed in the LEMP.

5.2 STAFF TRAINING

New members of staff at the facility should be inducted. This induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

All staff should receive sufficient training to enable them to carry out their assigned duties in a competent and safe manner. In particular:

- Staff must be capable of using the fire-fighting equipment;
- Staff must be capable of identifying excluded wastes;
- Staff must be capable of identifying potential pollution incidents; and
- Staff must be familiar with the requirements and procedures contained within this PIRMP.

Staff competency will be monitored through audits, public complaints and pollution incident reports.

At least once every year staff should undertake a simulated pollution incident response exercise, including with emergency services, to familiarise site personnel with the requirements of this management plan.

Table 3 Incident Response Training

| Type of Training | Personnel Involved | Frequency | Records |
|-------------------------|---|---------------------------------|--------------------|
| Toolbox meetings | Site staff | Weekly | Records / Diary |
| Overflow clean up | All staff | On-the-job | Nil |
| Site induction | New staff | Once | Records Department |
| Emergency simulation | All staff | Annual | Minutes |
| Incident debrief | Personnel involved in incident Independent chair | Within one month of an incident | Minutes |
| Plant and Equipment use | All staff | Once | Human resources |

Regular site briefings and toolbox meetings should be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to on-site safety procedures. **Section 7.6 'Adequate Staff Training'** in the LEMP needs to be updated to include due consideration of the PIRMP.

5.3 REVIEW AND UPDATE PIRMP

The PIRMP is a living document required to be reviewed and updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring.

For these reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use. Details of the version and date of issue are recorded on each page of the PIRMP in the bottom left hand corner.

Revised and updated versions of the PIRMP will always be issued with a covering memo summarising the changes. When a new PIRMP is received the old version is replaced in its entirety. A register for updating and testing the PIRMP and must be kept on site and updated regularly.

Three copies of any new PIRMP will need to be produced. They are to be distributed to the following:

- Waste Operations Supervisor, Cowra Shire Council;
- Administration Manager, Cowra Shire Council; and
- Technical Officer - Compliance, Cowra Shire Council

The PIRMP will be reviewed when there is a material change to operations including but not limited to:

- Modification of EPL 6435
- Changes in standard operating procedures referred to in this PIRMP
- Change in legislative requirements
- Recommendations arising from an incident debrief, emergency drill or emergency simulation exercise.

The responsibility for reviewing the PIRMP is the Manager - Cowra Services .

An update of the PIRMP would trigger all staff to undergo refresher training as part of the team toolbox meeting.



PIRMP / POLLUTION INCIDENT REPORTING FORM / TEST

| | | |
|---|----------|-----------------------|
| INCIDENT NO: (Test No) | TIME: | DURATION OF INCIDENT: |
| NATURE OF INCIDENT: | | |
| | | |
| WIND DIRECTION & SPEED: | | |
| RAINFALL SINCE 9AM: | | |
| THE LOCATION OF THE PLACE WHERE POLLUTION IS OCCURRING OR IS LIKELY TO OCCUR: | | |
| | | |
| THE NATURE, THE ESTIMATED QUANTITY OR VOLUME AND THE CONCENTRATION OF ANY POLLUTANTS | | |
| | | |
| THE CIRCUMSTANCES IN WHICH THE INCIDENT OCCURRED, INCLUDING THE CAUSE OF THE INCIDENT (IF KNOWN): | | |
| | | |
| THE CORRECTIVE ACTION TAKEN OR PROPOSED TO BE TAKEN TO DEAL WITH THE INCIDENT AND ANY RESULTING POLLUTION OR THREATENED POLLUTION (IF KNOWN): | | |
| | | |
| HAS ENVIRONMENT PROTECTION AUTHORITY (EPA) BEEN NOTIFIED? | YES / NO | |
| HAS NSW MINISTRY OF HEALTH (VIA PUBLIC HEALTH UNITS) BEEN NOTIFIED? | YES / NO | |
| HAS LOCAL FIRE AND RESCUE NSW BEEN NOTIFIED? | YES / NO | |
| HAS EPA DIRECTED COUNCIL TO NOTIFY NEIGHBOURS? | YES / NO | |
| IF NOT, HAS COUNCIL VOLUNTARILY NOTIFIED NEIGHBOURS? | YES / NO | |
| Position: | | |
| | | |
| Signature: | Date: | |
| | | |
| Position: | | |
| | | |
| Signature: | Date: | |
| | | |

Document Status

| Rev No. | Author | Reviewer | | Approved for Issue | | |
|---------|--|--|-----------|------------------------------------|-----------|------------|
| | | Name | Signature | Name | Signature | Date |
| 0 | GEOLYSE | Orange | | | | 01/03/2012 |
| 1 | S.Hayes adapted from 2012 PIRMP | S.Hayes Technical Officer Compliance | - | Stephen Fisher Chris Cannard | | 22/11/2016 |
| 2 | S.Hayes adapted from 2016 PIRMP | S.Hayes Technical Officer Compliance | - | Stephen Fisher Chris Cannard | | 14/12/2016 |
| 3 | S.Hayes adapted from 2016 PIRMP | S.Hayes Technical Officer Compliance | - | Stephen Fisher Chris Cannard | | 27/02/2018 |
| 4 | Stephen Fisher Adapted from 2016 PIRMP | Stephen Fisher Waste operations Supervisor | - | Stephen Fisher Chris Cannard | | 01/02/2020 |
| 5 | S.Fisher adapted from 2016 PIRMP | Stephen Fisher-Waste Operations Supervisor | | Stephen Fisher Phillippa Childs | | 04/02/2021 |
| 6 | P Childs Adapted from 2021 PIRMP | Philippa Childs Manager Cowra Services | - | Anthony Collins Philippa Childs | | 08/02/2022 |
| 7 | P Childs Adapted from 2022 PIRMP | Philippa Childs Manager Cowra Services | - | Anthony Collins Philippa Childs | | 28/04/2023 |

DOCUMENT CONTROL SUMMARY

| | | |
|-----------|---------------|-----------------------------|
| Version 1 | August 2012 | Initial Document |
| Version 2 | November 2016 | Mods from Incident |
| Version 3 | December 2016 | Mods / Update from Incident |
| Version 4 | January 2018 | Mod / Update |
| Version 5 | January 2019 | Mod / Update |
| Version 6 | February 2020 | Mod/Update |
| Version 7 | February 2021 | Mod/Update |
| Version 8 | February 2022 | Update |
| Version 9 | April 2023 | Update |

DESKTOP EXERCISE TEST SUMMARY

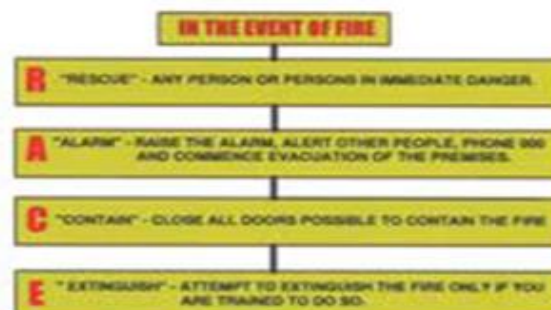
| | | |
|-----------|-------------------------------|------------------|
| Version 1 | August 2012 | Initial Document |
| Version 2 | 15 July 2015 | Test Completed |
| Version 3 | 6 December 2016 | Test Completed |
| Version 4 | 17 January 2018 | Test Completed |
| Version 5 | 18 December 2018 | Test Completed |
| Version 6 | 1 st February 2020 | Test Completed |
| Version 7 | 31 st January 2021 | Test Completed |
| Version 8 | 8 February 2022 | Test Completed |
| Version 9 | 16 February 2023 | Test Completed |



Pollution Incident Classification, Risk Assessment and Contributing Factors

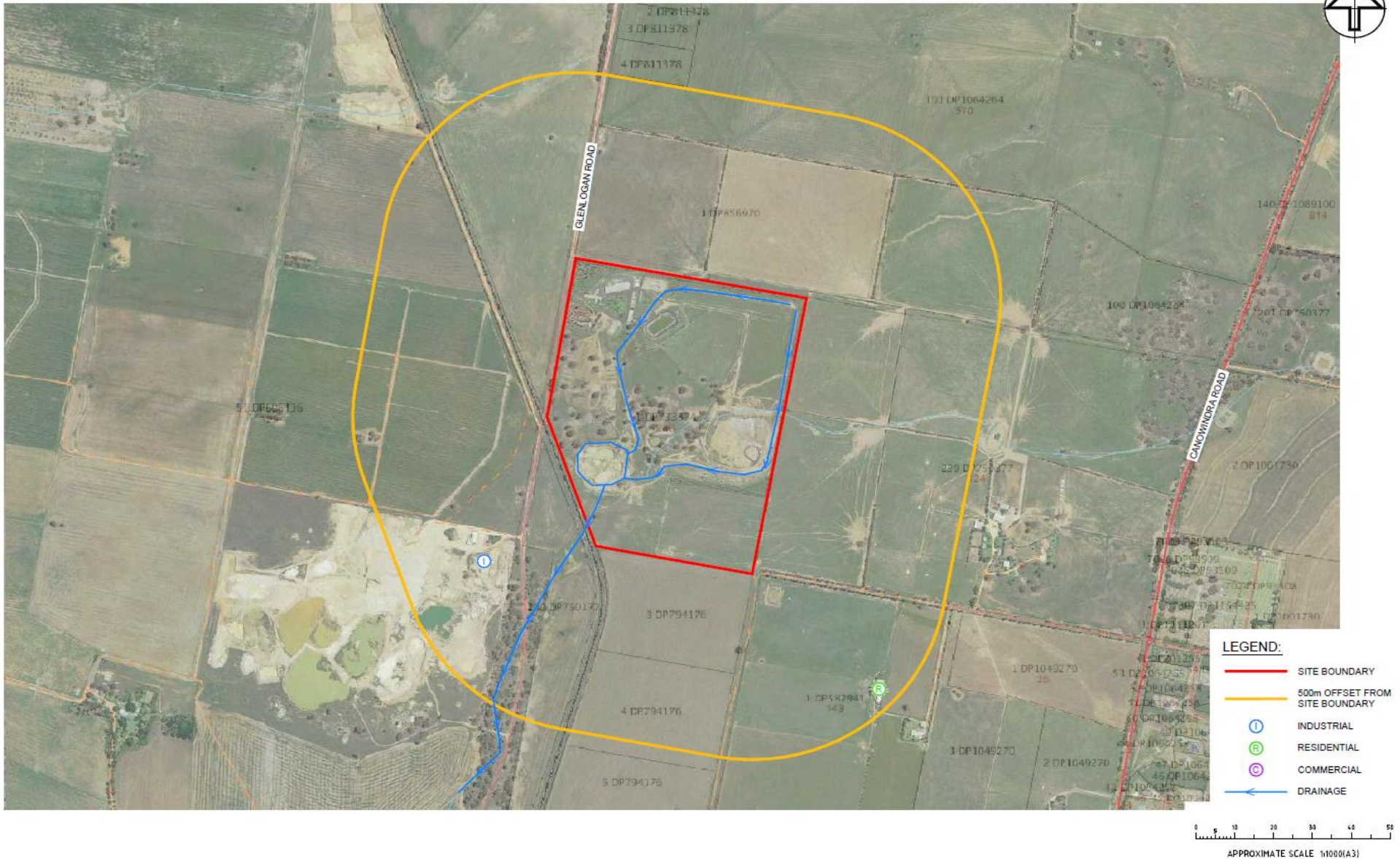
| Description of Pollution Incident | Likelihood | Impact | Contributing Factors |
|--|------------|--------|--|
| Identifying non-domestic quantities (more than 200 millimetres per tonne or 200 grams per tonne) of hazardous substances among waste | Medium | Low | Human errors made during waste screening |
| Surface or subsurface fires at active landfill, public receival areas & recycling facility | Medium | Medium | High winds, dry weather, prolonged high temps 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 maintenance and inactive areas | Low | High | High winds, dry weather, prolonged high temps, low humidity and spontaneous combustion. |
| Mixing of leachate and stormwater or waste and stormwater | Low | Medium | Prolonged periods of heavy rain, & lack of surface water pond and site maintenance. |
| Identification of any failure of an environmental protection system | Low | Low | Prolonged periods of heavy rain. |
| Identification of a significant difference in groundwater indicator parameters | Low | Low | Prolonged periods of heavy rain |
| Detection of subsurface gas, surface gas and/or accumulated gas in buildings at greater than 1.25 per cent methane (volume for volume) | Low | Low | On-site buildings which have not been designed to prevent accumulation of methane gas |
| Acts of vandalism or target of terrorist activity | Low | Medium | Increased risk during hours of closure |
| Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions | Low | Low | n/a |

MRF - MATERIAL RECYCLING FACILITY FIRE & EMERGENCY EVACUATION PLAN



FOR OTHER ENQUIRES CALL:

| | |
|---|---------------------|
| MANAGER COWRA WORKS | 0427 436 730 |
| THE ENVIRONMENTAL PROTECTION AUTHORITY (EPA) | 131 555 |
| SAFEWORK NSW | 131 050 |
| COMPLAINTS COWRA COUNCIL | 02 6340 2000 |



**POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN
GLENLOGAN ROAD LANDFILL AND
MATERIALS RECYCLING FACILITY**

PLAN OF NEIGHBOURS



**POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN
GLENLOGAN ROAD LANDFILL AND
MATERIALS RECYCLING FACILITY**

SITE PLAN