



April 2023

PIRMP

Pollution Incident Response
Management Plan

Cowra
Saleyards

EPA
Lic No 11336

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1. Background

1.1 Cowra Saleyards

Cowra Saleyards is located on the Young Road and operates as a livestock selling centre. There are two sales per week, with a cattle sale held every Monday and a sheep sale every Friday.

1.2 PIRMP Purpose

The licensed properties operate under the following Environment Protection Licences (EPL):

- EPL 11336 Cowra Saleyards.

These EPLs are issued under Section 55 of the *Protection of the Environment Operations Act 1997* by the NSW Office of Environment and Heritage (OEH). The EPLs contain requirements to report pollution incidents as outlined in condition R2:

Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within seven days of the date on which the incident occurred.

The introduction of the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) in February 2012 requires that holders of EPLs maintain a Pollution Incident Response Management Plan (PIRMP).

The PIRMP is held by the Technical Services section and Infrastructure and Operations section and is applicable to the Council saleyard operations. Council maintain a separate PIRMP for landfill operations.

2. Pollution Incident Response Planning

2.1 Risk Assessment

The main hazards which were identified for the licensed facilities are detailed in Table 1 along with control measures to minimise the occurrence and consequences (people and environment) of the identified risks.

Table 1 Hazards

Location	Hazard	Control Measure/s	Consequence	Likelihood of material harm	Escalating Factors
Saleyards	Fuel spill to land (truck fuel tank)	Designated traffic control/routes	Localised soil contamination	Low	Increased traffic flow through saleyards. Poor vehicle maintenance. Failure to follow designated routes.
	Effluent dam overflow	Effluent irrigation across site. Mechanical screening of contaminants Wetland filtration for nutrient removal	Localised soil contamination	Low	High rainfall High stock throughput
	Decay of animal carcass	Daily inspections and immediate removal to landfill.	Localised soil contamination and disease spread.	Low	Non-compliance with COC and Is it fit to lead? Manual.
	Biosecurity or suspect disease	Implement Emergency Management Plan	Rapid spread of disease at national scale	High	Lack of biosecurity controls

2.2 Potential Pollutants and Safety Equipment

Details of potential pollutants and safety equipment are provided in Table 2.

Table 2 Inventory of Pollutants and Safety Equipment

Potential Pollutant	Location	Maximum Quantity	Safety Equipment & Devices	Alarms
	Saleyards		Fire fighting equipment Glasses, safety boots and high vis vests Goggles and gloves Respirators	SCADA
Alum		23,000 L	PPE as per MSDS	
Sewage		2 ML/day		
Roundup		20 L		

2.3 Maps

Pollution incident response maps have been prepared to facilitate planning for incident response and provide readily accessible and accurate information to support the assessment of an incident and assist in the implementation of incident response procedures and clean up.

The following maps are provided in – Maps:

- Cowra Locality Map
- Features Map – Saleyards

2.4 Notifiable Incidents

2.4.1 POEO Act Definitions

A pollution incident is defined by the POEO Act as:

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 a 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.

Material harm is defined by the POEO Act as:

(1) For the purposes of this Part:

(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.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

3. Incident Response

3.1 Immediate Notification Incident

3.1.1 Incident Response and Notification

As per the definition of an immediate notification incident in section 2.4.1 and resulting from the risk assessment in Table 3 , Council have identified the following incident related to their, saleyard operations that requires immediate notification:

Council's procedures for responding to an immediate notification

Table 3 Incident Contact Details – Council – Saleyards

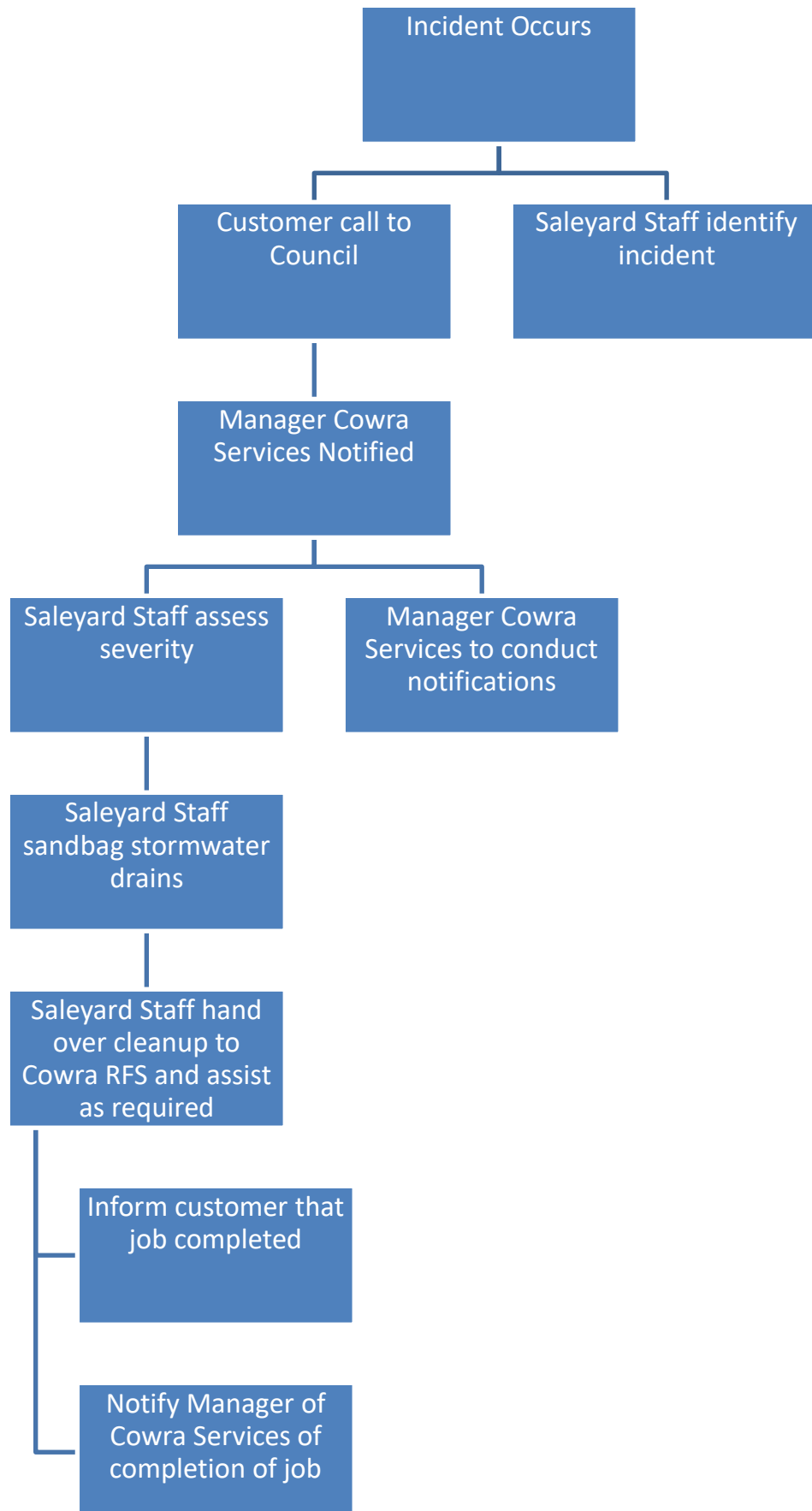


Table 3 Incident Contact Details – Council – Saleyards

Name	Role	Contact Number
Philippa Childs	Manager – Cowra Services	6340 2054 0417104586
Peter Seary	Supervisor – Airport, Cemeteries and Saleyards	6342 2654 0499 894 967
Paul Devery	General Manager	6340 2013
Council Emergency contact number After hours emergency contact		6340 2000 0419 219 231
Enquires and Complaints		6340 2000

Table 4 Incident Contact Details – External

Organisation	Contact Number
Emergency Services	000
EPA Bathurst Regional Office	131 555 6332 1838
NSW Public Health Unit On Call Public Health Officer Bathurst Regional Office	0428 400 526 02 63305880
Safework NSW	13 10 50
Fire & Rescue NSW Cowra Fire Station Cowra Rural Fire Service	1300 729 579 6341 1624 6363 6666

3.1.2 Responsibilities

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

- On Call Saleyards 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. Training & Review

4.1 Training

Personnel involved in saleyard operations undertake a range of training to assist in the response to potential incidents and to test the adequacy of incident response procedures and plans. Details of the training and testing of the PIRMP is provided in Table 5.

Table 5 Incident Response Training

Type of Training	Personnel Involved	Frequency	Records
Water quality analysis	Saleyards Operators / Compliance Officer	On-the-job	Human Resources
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

4.2 PIRMP Review

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

- Modification of EPL 11336
- 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.

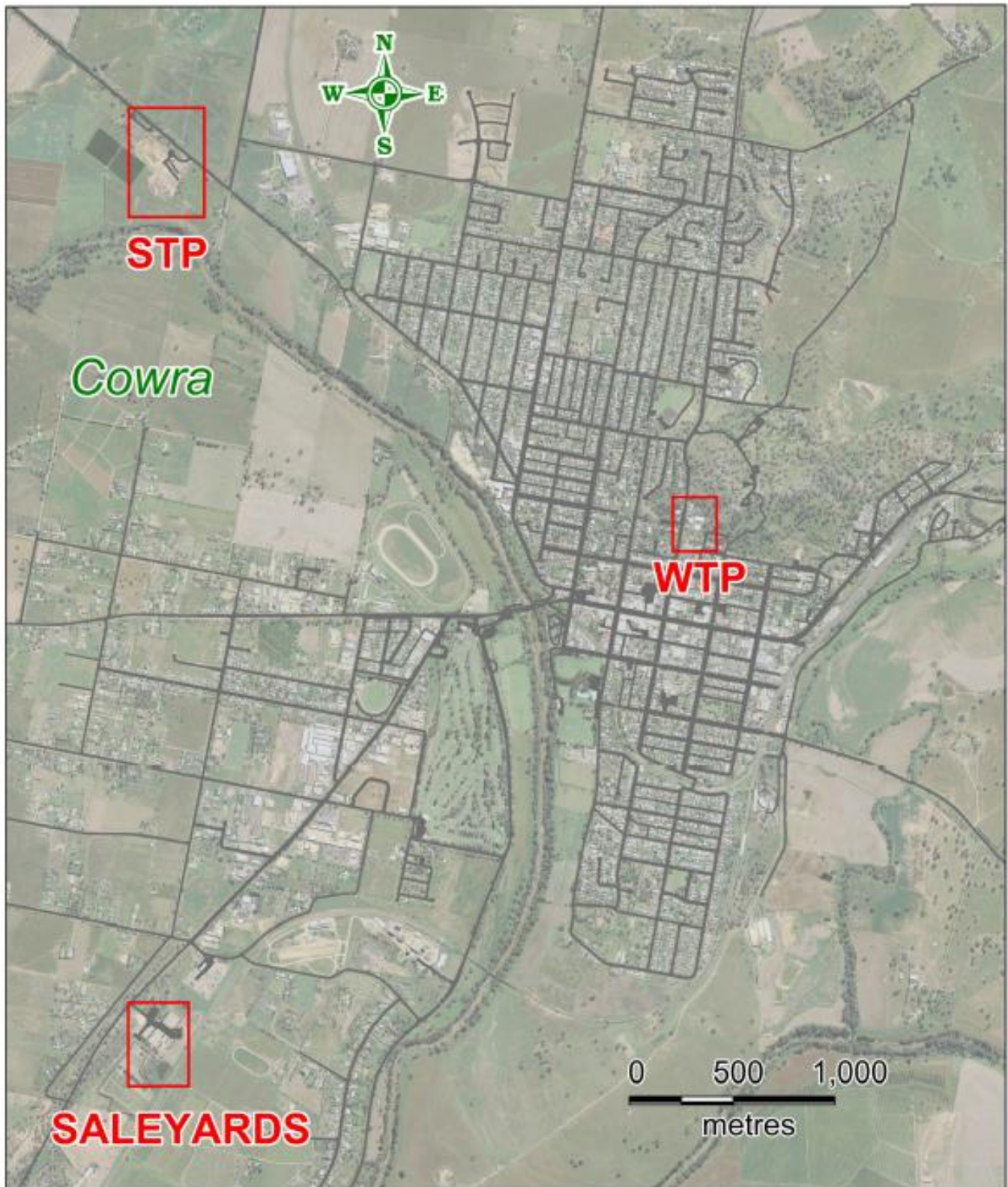
The responsibility for reviewing the PIRMP is the Manager - Cowra Services.

An update of the PIRMP would trigger all staff to undergo refresher training as part of the team toolbox meetings as per Table 5.

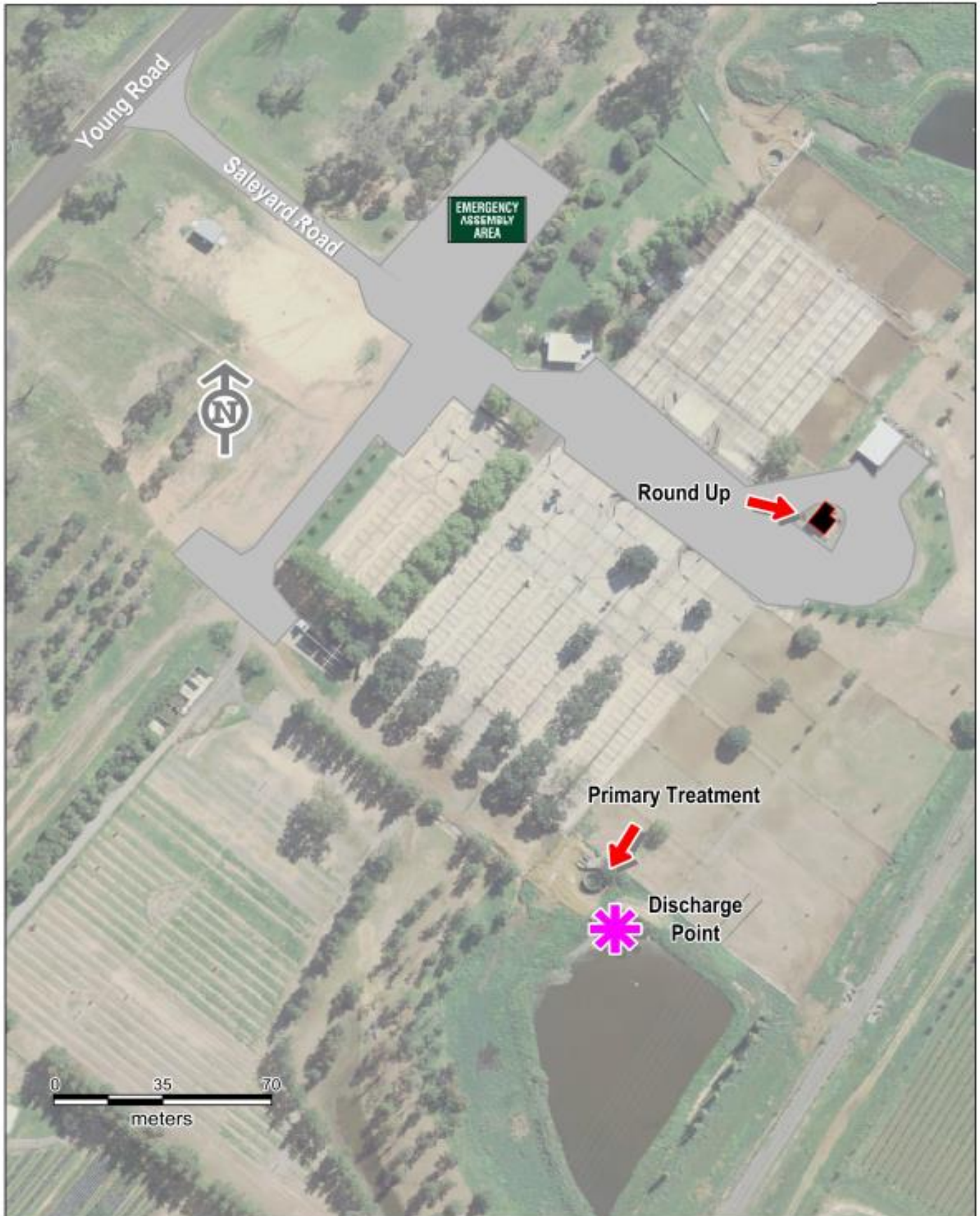
Appendices

Appendix A – Maps

Appendix A: Map Overview of Site Plans



Appendix B: Map 2 - Cowra Saleyards Site Plan





**Pollution Incident Management Plan
Cowra Saleyards EPL 11336**

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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		Robert Bowd Chris Cannard		22/11/2016
2	S.Hayes adapted from 2016 PIRMP	S.Hayes – Technical Officer - Compliance		Robert Bowd Chris Cannard		14/12/2016
3	S.Hayes adapted from 2016 PIRMP	S.Hayes – Technical Officer - Compliance		Robert Bowd Chris Cannard		3/ 10/ 2017
4	S.Hayes adapted from 2016 PIRMP	S.Hayes – Technical Officer - Compliance		Robert Bowd Chris Cannard		26/ 07/ 2018
5	Robert Bowden Adapted from 2018 PIRMP	Robert Bowd – Supervisor -Saleyards		Robert Bowd Chris Cannard		04/02/2020
6	P Childs Adopted from 2021 PIRMP	Philippa Childs – Manager - Cowra Services		Robert Bowd		09/02/2022
7	P Childs Adopted from 2022 PIRMP	Philippa Childs – Manager - Cowra Services		Peter Seary		20/04/2023

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	October 2017	Updated
Version 5	July 2018	Updated
Version 6	February 2020	Updated
Version 7	January 2021	Updated
Version 8	February 2022	Updated
Version 9	April 2023	Updated / mod from test incident

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	3 October 2017	Test Completed
Version 5	12 July 2018	Test Completed
Version 6	4 February 2019	Test Completed
Version 7	January 2021	Test Completed
Version 8	February 2022	Test Completed
Version 9	April 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