

# Central Coast Council Buttonderry Waste Management Facility

## Pollution Incident Response Management Plan (PIRMP) Environment Protection Licence (EPL) - 5955

April 2023 edition V1.0

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## 1 Introduction

This is the Buttonderry Landfill's Pollution Response Management Plan (PIRMP). It has been written to meet the requirements under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) and *Protection of Environment Operations (General) Regulation 2022 (POEO GR) (see Appendix 12)*. Under this legislation the site is required to prepare, keep, test and implement a Pollution Incident Response Management Plan. The objectives of the PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to:
  - o Staff, contractors, and the public at the premises and in Council administration
  - Environment Protection Authority (EPA)
  - NSW Ministry of Health
  - SafeWork NSW
  - Fire and Rescue NSW
  - 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.

Beyond meeting the legislative requirements, the purpose of this PIRMP is to reduce the risk of an environmental pollution incident occurring and given the residual risk that will always be present help to coordinate an appropriate and timely response should such an incident occur.

## 2 PIRMP Keeping, Testing & Updating Requirements

The specific requirements for Pollution Incident Response Management Plans are set out in the PIRMP legislation in Appendix 11.

### 2.1 Preparation and Availability of the PIRMP

As Buttonderry holds EPL 5955 accordingly it must:

- Prepare a PIRMP, which is this document, according to s153A POEO Act
- The PIRMP must be kept (s153D POEO Act) and made available (s74(1) POEO GR) to all staff authorised to implement the PIRMP:
- A written copy of the plan must be kept on-site at the Buttonderry Waste Management Facility and be able to be provided to an authorised EPA Officer on request. Electronic versions are also available on the Intranet in the Waste Management Section and in Content Manager.

### 2.2 <u>Testing of the PIRMP</u>

Testing of the PIRMP is required under s153E POEO Act.

- At least once routinely every 12 months, usually in July or August each year, and or
- Within 1 month of a Material Harm incident, threatening or occurring, on the site (both under

s75(1) POEO GR)

• The testing must include the information in the PIRMP is accurate (under s75(2) POEO GR)

The testing of the PIRMP can be undertaken as:

- A desktop test for a maximum of 4 years in a row according to the EPA's PIRMP Guidelines for a Level 1 Risk EPL.
- At least one practical test using a risk scenario will be undertaken once every 5 years. (under s72(p) POEO GR).

### 2.3 Updating of the Plan

After each testing of the PIRMP the details of improvements to the PIRMP will be prepared. These improvements will be used to update the PIRMP document within 1 month of the testing where they are relevant to its improvement. (under s72(o) POEO GR).

## **3** Definition of a Pollution Incident

The definition of a pollution incident is:

<u>"pollution incident"</u> 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 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.

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.

Note s147(a)(i) is referred to as Non-Trivial Material Harm (NTMH).

### 3.1 Incident Threat Levels

Clarification of the meaning of **Non-Trivial Material Harm** for the operational purposes of Central Coast Council (CCC) in this PIRMP are set out below. Here Material Harm does not include Level 1 Possible License Report, but includes Level 2 and above.

To better determine what are Material Harm incidents, subsection (i) non-trivial incidents are clarified further for purposes of CCC Buttonderry Landfill operation below.

### 3.2 Pollution Incident Threat Levels

**Level 1.** Possible license report  $\rightarrow$  Sub-Material Harm but may wish to report to EPA only as a license condition. Contact CCC Incident Hotline and they will contact the EPA.

Examples:

- An exceedance of an EPL limit which is less than 105% of the EPL limit
- Complaints from neighbours of odour or dust are received, or
- A spill of leachate or aqueous based liquid which has entered into the stormwater system but is able to be stopped from leaving the site.
- **Level 2.** Material Harm low level  $\rightarrow$  Reportable as material harm but does not require a fire unit on site. Contact CCC Incident Hotline and they manage the incident. The incident can be adequately managed internally.

Examples:

- Any spill or escape of a solid liquid or gas which is likely to cost more than \$10,000 to rectify
- Complaints from one or more neighbors of odour or dust are received, but have also reported health issues such a vomiting or need to visit a doctor
- Independent and non-vexatious complaints from neighbors exceeding 4 complaints
- Complaint from a neighbour indicating a significant incident has occurred, e.g. fire or major leak etc.
- A spill which has entered into the stormwater system but is unable to be stopped from leaving the site, or
- Any media coverage or likely media coverage of the incident
- Level 3. Material Harm High Level → Reportable as material harm, requires a fire unit, 000 as the incident cannot be adequately managed internally. Following the 000 call, contact the CCC Incident Hotline.

Examples:

- A site evacuation is required for a pollution incident or a fire
- The incident large and requires external Emergency Services (i.e. a fire unit) to be on site to assist
- Neighbours health and wellbeing are affected or likely to be affected, beyond interference with general wellbeing or their repose, or
- Any spill or escape of a solid liquid or gas which is likely to cost more than \$10,000 to rectify and external assistance is required to limit further environmental harm.

There is an environmental duty on everyone, especially Environment Protection License (EPL) holders, upon becoming aware of a Material Harm pollution level incident, to report such incidents immediately to the CCC Incident Hotline which will contact the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strong provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal

with the incident in a faster time.

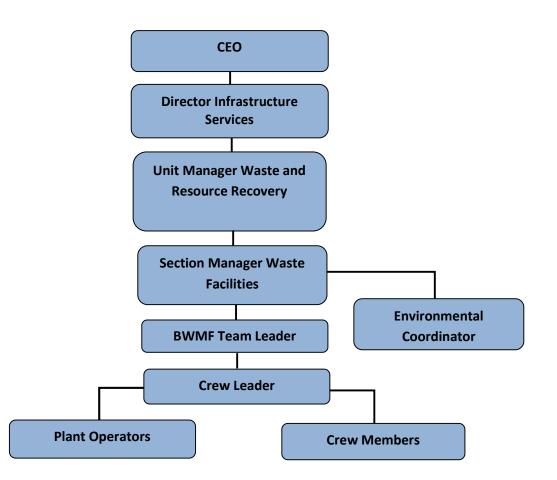
There are associated offences, for individuals and corporations, for not preparing a PIRMP, not keeping the PIRMP at the premises to which it relates, not testing the PIRMP in accordance with the Regulations and not implementing the plan in the case of an incident.

## 4 Identification of Key Persons

The following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- a. the person carrying on the activity
- b. an employee or agent carrying on the activity c. an employer carrying on the activity
- d. the occupier of the premises where the incident occurs.

## 5 Buttonderry Waste Facility Organisational Chart



A list of the key staff on-site at Buttonderry Landfill are listed in Appendix 1. Such staff will be the first incident combat personnel to respond to most pollution incidents. Only large incidents, such as large fires, would the entire site be evacuated leaving combat largely to NSW Fire and Rescue.

## 6 Content Manager Relationship with other Emergency Evacuation Plans

In the event of an environmental incident staff must follow this PIRMP. However, should an incident require the evacuation of staff the existing "Emergency Evacuation Plan" (see Content Manager folder F2004/08823, document *D02060517*) for the site must be followed.

It must be noted, however, Council must still meet its obligations under this PIRMP even in the event of an emergency evacuation. This means that Council will be responsible for cleanup of pollution during and after emergency services hands back site control to Council.

## 7 Relationship with On-site Lease Holders

Buttonderry Waste Management facility also has two external companies, which lease areas of land within the facility, and these companies have their own Environment Protection Licenses (EPL's);

- 1. Australian Native Landscapes Pty Ltd. (ANL) EPL 7349
- 2. LMS Energy Pty Ltd EPL 20059

In the event of a pollution incident or emergency these companies must:

- 1. Follow their own PIRMP on their own-site
- 2. Inform the Site Manager Buttonderry Waste Management Facility immediately of the incident
- 3. If a site evacuation is required follow the "Buttonderry Waste Management Facility Emergency Evacuation Plan" and follow the instructions given by the Site Manager.

If there is an incident on-site at Buttonderry Waste Management Facility the Site Manager will also inform / communicate with these companies. A joint combat action on a pollution incident may be called.

### 8 Pollution Incident Response Procedure

- 1. Staff are to inform the Crew Leader / Team Leader (highest Site Manager in charge) immediately of Levels 1, or 3 of a pollution incident.
- 2. In the absence of the Crew Leader / Team Leader Staff are to inform the Environmental Coordinator, Waste Coordinator or the Section Manager Waste Facilities who will perform the role of the Site Manager (*Appendix 1*).

#### The Site Team Leader and Crew Leaders must then perform the following actions:

- 1. Investigate to determine the legitimacy, level and extent of the incident. Obtain a description of the incident which should, if possible, include:
  - Where the incident is obtain good locational details
  - Are any persons injured and what is their status

- The type equipment/infrastructure that is involved e.g. it is a vehicle, pipe leaking, dam leaking, drum leaking etc
- If there is a spill, leak or escape of a substance/s, what type/s of substance is it
- How much (approximate) volume has escaped from its containment
- Where is this substance going to a drain or other route of progression or escape off site
- 2. Use the available information to assess incident level, and then phone:
  - Level 2 or 3: If it is, or is likely to be, a Material Harm incident, then arrange for immediate notification via phone calls to the 24 hr CCC Incident Hotline Ph: 4350 5789 Choose "Environmental Incident". Hotline staff will then contact the five agencies as in Table 1.
  - Levels 1, 2 & 3: Contact the 24 hr CCC Incident Hotline Ph: 4350 5789 Choose "Environmental Incident" (*Pollution Incident Reporting Procedure" pg 10*).
- 3. If any staff are injured, attend to them first if it is safe to do so. Refer to the *Emergency Evacuation Plan Buttonderry Waste Management Facility.*
- 4. Assemble a response team, equipment and resources from on-site staff, plant and equipment to obtain the required assistance. This may be increased by accessing external staff, contractors and or Fire and Rescue if required.
- 5. Ensure the area is controlled and safe: e.g. isolate area (evacuate / barriers), traffic diversion (barriers / signage) etc, in accordance with EMS Procedures.
- 6. If the incident involves a liquid which could potentially contaminate stormwater it must be prevented from entering waters or drain.
- 7. Inform lease holders ANL and LMS if the pollution incident may affect them e.g. changed traffic conditions / smoke (*Appendix 1*).
- 8. Delegate the role of informing the neighbours via door knocking and notifying the *Communications Section* within CCC. <u>("Notify the Neighbours" pg 10)</u>.
- 9. If an area or site evacuation is required follow the Appendix 5 <u>"Buttonderry Waste Management</u> <u>Facility Emergency Evacuation Plan"</u>.
- 10. Conduct an investigation into the incident, debrief staff and recommend actions to reduce the risk of the incident occurring again within 2 weeks.
- 11. A short report is to be prepared covering the points in section 10 which must be:
  - Provided in writing to the EPA as per R2.2 EPL 5955
  - Reviewed within one month of a pollution incident occurring.

## 9 Pollution Incident Reporting Procedure

1. Site Manager / Team Leader / Crew Leaders must report ALL environmental incidents on the 24-Hour CCC Incident Hotline Ph: 02 4350 5789, choose "Environmental Incident".

- Council's Environmental Regulation Staff will determine if the incident meets the definition of a Material Harm Pollution Incident as outlined in Section 3 of this report (i.e. Level 2 or 3 pollution incident).
- 3. If the pollution incident is considered a "**Material Harm**" (level 2 or 3), it will be reported to the following Authorities according to Table 1:

Table 1:	Table 1: Material Harm Notification Phone Numbers						
Order	Service	Phone					
1a	Fire – Requiring a fire unit (Pollution Threat Level 3)	000					
1b	Fire – NOT requiring a fire unit (Pollution Threat Level 2) 1300 729 579						
2	EPA Environment Line 131 555						
3	Ministry of Health via the Public Health Unit – Gosford 02 4320 21: Officer (Ask for On-Call Nurse)						
4	SafeWork NSW	131 050					
5	CCC Occurrence Hotline 02 4350 5789						

#### <u>NOTE: If the Site Manager / Team Leader / Crew Leaders or the Incident Hotline is unattended</u> <u>staff will need to report environmental pollution incidents directly to these Services.</u>

**Staff making such calls to take a note** of the phone number, time of the call, agency and response, such as an incident number.

## **10** Pollution Incident Information that must be recorded

Under s75 POEO GR and R2.2 of EPL 5955, the details of the incident are to be provided to the EPA in writing within 7 days of the date of the incident. This information is to include:

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

## **11 Notify the Neighbours**

In the event that the pollution incident is likely to affect the neighboring properties, e.g. via smoke or water contamination, the Site Manager must coordinate the task of notifying the neighbours. This includes both early warnings and regular updates. Actions can include:

- 1. Delegate a member of Staff to phone and or door knock on the affected neighboring properties.
- Delegate a member of Staff to notify Communications to place updates on Council and social media websites. Please contact the following boundary neighbors and potential receptors:

roperty Address	Property Owner	Contact Name	Contact Number

### 11.1 PIRMP information on Website

Certain sections of the PIRMP are to be made publicly accessible on the CCC website under s 74(2) POEO GR. The components of the website PIRMP are to include s52(h) & (i) POEO GR:

- Early warnings to neighbours covering what to do if threatened by a pollution incident from the site
- How the neighbours will be provided with contact and updates on the pollution incident

- Table 1 being the five agencies required to be phoned following a Material Harm incident
- Australian Native Landscapes Pty Ltd. (ANL) and LMS Energy Pty Ltd (LMS) if the pollution incident may affect them.



Central Coast Council Buttonderry Waste Management Facility

PIRMP - Pollution Incident Response Management Plan Appendix 1-11 Environment Protection License (EPL) - 5955

#### **APPENDIXCIES**

1-11

(Quick Reference Information)

## **APPENDIX 1: Pollution Incident Response Plan Details & Contacts**

Facility Name and Address:					
Buttonderry Waste Management Facility					
Hue Hue Road, J	illiby NSW - Ph: (02) 4350 1320				
Date of the Plan:	Review Plan by:				
April 2023	As per Section 2.3				
Date Plan Tested:	Re-test Plan by:				
July 3, 2023	July 3, 2024				
Plan Written by:	Plan Approved by:				
Australian Sustainable Business Group	Section Manager Waste Facilities				
CCC advisor					

## **APPENDIX 2: On-site Incident Management Resources**

Equipment	Location
Mobile Safety Shower	Tip Face
Eye Wash Stations and Shower	Transfer Station near Chemical Storage Area
First Aid Kits x 6	Weighbridge x 1
	Main Site Office x 1
	Admin Building x 1
	Tip Face Site Shed x 1
	Transfer Station x 1
	LMS Contractors x 1
2-Way Radio / Mobiles	Held by Permanent Staff and Contractors
Phones	Weighbridge
	Crew Leaders
	Main Site Office
Email / Phone	Main Site Office/ Admin Building
	Weighbridge
Spill Kit x 2	Located in the Transfer Station near Oil Recycling Shed
Clean Sweep Absorbent	Located in the Storage Container in Site Office
Material	Located in the Transfer Station in rear of Oil Recycling Shed and near spotters shed
Fire Extinguishers	Main Office/Admin Building
	Transfer Station
	Tip Face
	Recycling Stockpile Area
	Site Machinery
Fire Hoses	8,000 Litre Water Cart with Water Cannon (Access to 150,000L of tank water in the Transfer Station)
2000 L Mobile Water Tank 1000 L Mobile Water Tank	Trailer mounted - Located on active tip face
Traffic Control / Signage	Witches Cones, Stop & Go Bats, Barrier Boards, Signs

Trade Name	Substance	Solid/Liquid/ Gas or Powder	Container Size	Max Quantity	Location

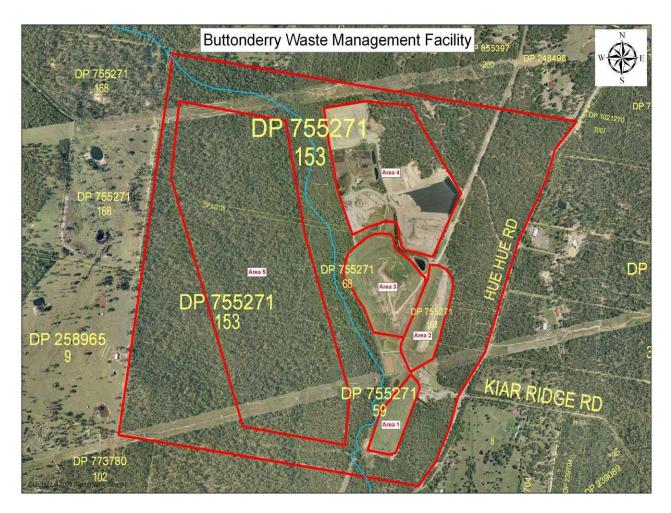
Substance	Pond No.	Solid/Liquid/ Gas or Powder	Max Quantity	
Leachate	Pond 1	Liquid	1,052 (m3)	
Leachate	Pond 2	Liquid	2,065 (m3)	
Leachate	Pond 3	Liquid	3,500 (m3)	
Leachate	Pond 4	Liquid	3,500 (m3)	
Leachate	Base of Cell 4.2	Liquid	6,000 (m3)	
Leachate	Base of Cell 4.3	Liquid	2,000 (m3)	See Map 2 –
Leachate	te Base of Cell 4.4		To be confirmed	Pond Storage
Total Leachate Storage Capacity			18,117 (m3)	for locations
Sediment & Water	Pond 1	Liquid	5,000 (m3)	
Sediment & Water	Pond 2	Liquid	7,200 (m3)	
Sediment & Water	Pond 3	Liquid	1,175 (m3)	
Sediment & Water	Pond 7	Liquid	3,025 (m3)	
Total Sediment Stora	age Capacity		16,400 (m3)	

### **APPENDIX 3: Leachate and Sediment Pond Storage**

### **APPENDIX 4: Map One - Location**

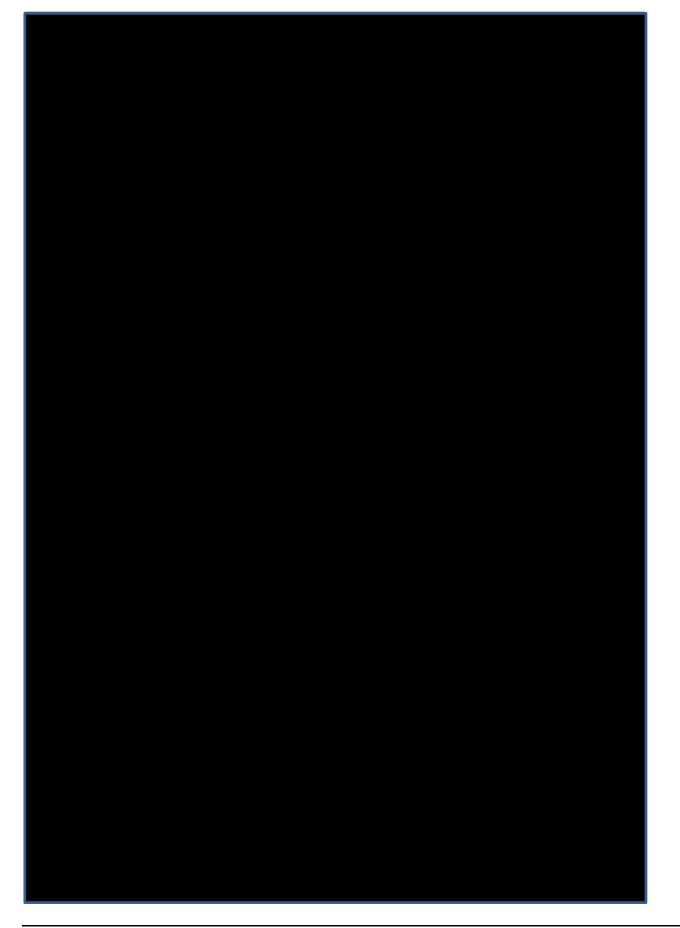
The Facility occupies Lots 59, 68, 169 and a portion of Lot 153 (DP 755271) and Lot No. 1 (DP 822126) and is located approximately 10 km north of the township of Wyong, in the suburb of Jilliby.

The Facility is currently open every day of the year, Monday to Friday from 7:00 am to 4:00 pm and weekends from 8:30 am to 4:00 pm and is accessed at the intersection of Hue Hue Road and Kiar Ridge Road. The location of the Facility is shown in Figure 1 below.



Buttonderry Creek runs along the western side of the Waste Facility and drains to Wyong River and then Tuggerah Lake. In addition, the Buttonderry Waste Facility contains and is surrounded by bushfire prone land. Both of which are to be protected under this PIRMP.

### **APPENDIX 5: Map Two-Evacuation Plan**



Responsible Officer: Approved by: Document review-by date: Environmental Coordinator Section Manager Waste Facilities April 2024

### **APPENDIX 6: Map Three- Environmental Monitoring**

(Ponds / Monitoring Points)

Responsible Officer: Approved by: Document review-by date: Environmental Coordinator Section Manager Waste Facilities April 2024

## **APPENDIX 7:** Map Local Areas – Closest Residential Dwellings



Responsible Officer: Approved by: Document review-by date: Environmental Coordinator Section Manager Waste Facilities April 2024

### **APPENDIX 8: Hazard Risk Matrix**

Potential Hazard	Likelihood of Hazard	Circumstances that can increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Leachate				
Leachate dam or dam wall failure	Very unlikely	maintenance of	<ul> <li>Regular checking of leachate dams to prevent over topping</li> <li>Alarm systems to alert if dams are too full</li> <li>Earth moving equipment on site to undertake corrective actions</li> </ul>	<ul> <li>Stop the flow by:</li> <li>Place clay bund wall in the flow path of the leachate.</li> <li>Pump leachate to the leachate collection system, alternatively arrange for a tanker to cart the leachate to the treatment plant.</li> </ul>
Bleed through cell wall	Unlikely	Excessive period of rain	<ul> <li>Leachate management procedure in place</li> <li>Barrier and collection system in place</li> <li>Cell floor / walls built to EPL requirements.</li> <li>Design filling plan to direct surface water away from the tipping face.</li> <li>Ensure leachate can penetrate through compacted waste to the leachate collection system eg remove intermediate capping between layers.</li> </ul>	Repatch the wall by:

Responsible Officer: Approved by: Document review-by date: Environmental Coordinator Section Manager Waste Facilities April 2024

Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
<b>Leachate</b> Leachate Pond	Unlikely	Excessive period	Leachate management procedure in	<ul> <li>In the event of a leachate pond overflow (eg</li> </ul>
Overflow		of rain	<ul> <li>place</li> <li>If the pond is nearing capacity arrange to either:</li> <li>Transfer to another pond</li> <li>Irrigate onto either Areas 1, 2 or 3 – must not exceed the absorption capacity of these areas</li> <li>Arrange leachate to be tankered around or off-site</li> <li>All pump readings must be recorded on the 'Leachate Transfer recording form' and filed in the Leachate record folder.</li> </ul>	<ul> <li>significant rainfall event):</li> <li>Attempt to control the overflow by placing a bund around the edge of the dam or in the flow path of the leachate overflow.</li> <li>Pump leachate to alternative dam with sufficient capacity</li> <li>Arrange tanker to transfer leachate around site or off site for disposal to sewer.</li> </ul>
Groundwater Contamination by leachate	Possible	Excessive period of rain	<ul> <li>Leachate management procedure in place</li> <li>Quarterly Groundwater monitoring system in place</li> <li>Barrier and collection system in place</li> <li>Cell floor / walls built to EPL requirements.</li> </ul>	<ul> <li>Check leachate levels in</li> <li>waste cells to ensure levels are acceptable. Transfer leachate to leachate ponds if necessary.</li> <li>Try to determine the source of the contamination and eliminate.</li> <li>Seek expert advice</li> </ul>

Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Gas		1		·
Emissions	Almost Certain	Excessive period of rain	<ul> <li>Cells are all covered with capping material as per EPL requirements</li> <li>Monthly surface gas monitoring</li> <li>Quarterly sub-surface gas monitoring</li> <li>Remediation procedures in place</li> </ul>	Follow EMS 56 – "Management of Methane Gas a Buttonderry Waste Management Facility"
Gas Collection System Leak	Unlikely	Excavation works in the vicinity	<ul> <li>All gas infrastructure has been surveyed and is outlined in the Site Utilities Plan</li> <li>Consult Site Utility Plan prior to any work commencing</li> <li>Gas Extraction System operates under negative pressure</li> <li>LMS construct system according to legislative requirements</li> </ul>	<ul> <li>Contact LMS immediately to:</li> <li>Shut down the Gas Extraction system</li> <li>Carry out repairs</li> </ul>
Explosion	Rare	A buildup of gas in a confined space Rapture of gas pipe / creation of a spark	<ul> <li>Gas Extraction and remediation system</li> <li>Monthly surface gas monitoring</li> <li>Quarterly sub-surface gas monitoring</li> <li>Remediation procedures in place.</li> </ul>	Contact the Site Manager who will coordinate the incident response / evacuation

Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Chemicals				·
Spill	Unlikely	Container damaged Illegal dumping by Customer	<ul> <li>Waste Screeners checking customer loads</li> <li>EMS 62 – "Receival and Management of Waste and Recyclables"</li> </ul>	Contact the Site Manager who will coordinate incident response. Also Refer to the EPA's <u>Community Recycling Centres Handbook – 2<sup>nd</sup> Edition</u>
Exposure	Unlikely	Container damaged Illegal dumping by Customer Staff not wearing PPE	<ul> <li>EMS 62 – "Receival and Management of Waste and Recyclables"</li> <li>Use default PPE in an emergency except for chemicals in containers</li> <li>SDS in Site Office</li> <li>Eye Wash Station / Safety Shower / PPE</li> </ul>	Contact the Site Manager who will coordinate incident response.
Fire	Unlikely	Container damaged Illegal dumping by Customer	<ul> <li>Chemicals removed from waste and placed and stored in purpose built chemical storage shed</li> <li>EMS 62 – "Receival and Management of Waste and Recyclables"</li> <li>Chemicals collected regularly by contractor</li> <li>Staff trained in dealing with hazardous chemicals</li> <li>Use of Fire Extinguishers</li> </ul>	Contact the Site Manager who will coordinate incident response.
Sediment	_		-	
Overflow	Almost Certain	Excessive period of rain	<ul> <li>Sediment Management Procedure in Place</li> <li>Ponds Cleaned out yearly.</li> </ul>	<ul> <li>Flocculate and release within 5 days of a rain event</li> </ul>

Responsible Officer: Approved by: Document review-by date: Environmental Coordinator Section Manager Waste Facilities April 2024

Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Mud Tracking	Likely	Wet Weather	<ul> <li>Sediment Management Procedure in Place</li> <li>Water Cart regularly wash down roads /vehicles in wet weather</li> <li>Shaker Grids / Wheel Wash</li> </ul>	<ul> <li>Roads are washed down as required</li> <li>Place gravel on roads to reduce mud</li> </ul>
Odour				
Affecting neighbours	Possible	Fire Wet Weather Lack of cover material	<ul><li>Follow EPL odour requirements</li><li>Tip face covered daily</li></ul>	Contact the Site Manager who will coordinate a response.
Noise		1		
Affecting Neighbours	Possible	Heavy machinery period of increased activity	<ul> <li>Follow EPL noise limit requirements</li> <li>Machinery meets requirements</li> </ul>	<ul> <li>Immediately cease the noise generating activity</li> </ul>
Asbestos				
Exposure	Possible	Improperly wrapped asbestos Machine driving over asbestos Staff not wearing PPE	<ul> <li>EMS 35 - "Asbestos Receival and Management at Buttonderry Waste Management Facility"</li> <li>Guidelines for customers relating to asbestos booking and presentation</li> </ul>	• Follow EMS 35 - "Asbestos receival and Management at Buttonderry Waste Management Facility"

Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Fire				
Ignition of waste	Possible	Ignition source within waste load Person smoking onsite	<ul> <li>Inspect loads upon receipt</li> <li>No smoking is permitted onsite</li> <li>Compact and cover landfilled waste</li> <li>Keep stockpiles of flammable wastes to a minimum and isolated from tip face or other combustible materials</li> <li>Follow EMS 62 – "Receival and Management of Waste and Recyclables"</li> <li>Follow EMS 54 – "Management of Landfill Fires at Buttonderry Waste Management Facility"</li> </ul>	<ul> <li>Contact the Site Manager who will coordinate incident response.</li> <li>Follow EMS 54 – "Management of Landfill Fires at Buttonderry Waste Management Facility"</li> </ul>
Fire water runoff from firefighting activities	Possible	Large quantities of water used to fight fire	<ul> <li>Keep combustible waste materials in bunded areas or areas that runoff is captured.</li> </ul>	Contact the Site Manager who will coordinate incident response
Smoke impacts on persons onsite/ neighbours	Possible	Type of material burning Location of persons Wind direction and strength	<ul> <li>Inspect loads upon receipt</li> <li>Keep people out of smoke</li> </ul>	Contact the Site Manager who will coordinate incident response.

### **APPENDIX 9: Description of Hazards**

Leachate: Any liquid that drains through the active area of the landfill. It is normally contaminated with a number of pollutants.

**Sediment / Stormwater:** Landfill stormwater runoff is precipitation that reaches the surface of a landfill and is subsequently stored and then discharged from the landfill site either to a receiving water body or to the stormwater system.

Gas: As waste breaks down over time in the landfill by micro-organisms a range of landfill gases are produced - the main one being methane.

**Chemicals:** Chemicals are substances (solid / liquid or gas) which can be hazardous which are used for variety of purposes.

Fire: The rapid oxidation of a material in the exothermic chemical process of combustion, releasing heat, light, and various reaction products.

Odour: The property of a substance that gives it a characteristic scent or smell.

Noise: Can refer to any sound, but generally refers to any unwanted sound.

Asbestos: Is a set of six naturally occurring silicate minerals used commercially for their desirable physical properties

Responsible Officer: Approved by: Document review-by date: Environmental Coordinator Section Manager Waste Facilities April 2024 Document Reference: D15570966 Edition No: 1.0 Approval Date: April 2023

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### APPENDIX 10: Training / Testing of the Plan

This plan must be tested once every 12 months. The information provided must be up to date and it must be demonstrated that it is capable of being implemented in a workable and effective manner if requested by the EPA. Testing of the plan is to include both desktop simulations and practical exercises and training drills. Testing must cover all components of the plan including the effectiveness of training. *As per POEO Act 1997 – Section 153E – Testing of the Plan* 

**Operators:** The following operators have read and tested this plan and agree to follow the procedures set out in this management plan.

Position	Name	Signature	Date

Responsible Officer: Approved by: Document review-by date: Environmental Coordinator Section Manager Waste Facilities April 2024

## **APPENDIX 11: PIRMP Legislative Basis**

PIRMF	PIRMP Legislation			
POEO Act Part 5.7				
153A	Duty of licence holder to prepare pollution incident response management plan			
	The holder of an environment protection licence must prepare a pollution incident response			
	management plan that complies with this Part in relation to the activity to which the licence relates.			
153C	Information to be included in plan			
	A pollution incident response management plan must be in the form required by the regulations and must include the following:			
	(a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:			
	(i) the owners or occupiers of premises in the vicinity of the premises to which the			
	environment protection licence or the direction under section 153B relates, and			
	(ii) the local authority for the area in which the premises to which the environment protection			
	licence or the direction under section 153B relates are located and any area affected, or			
	potentially affected, by the pollution, and			
	(iii) any persons or authorities required to be notified by Part 5.7,			
	(b) a detailed description of the action to be taken, immediately after a pollution incident, by the			
	holder of the relevant environment protection licence, or the occupier of the relevant premises, to			
	reduce or control any pollution,			
	(c) the procedures to be followed for co-ordinating, with the authorities or persons that have been			
	notified, any action taken in combating the pollution caused by the incident and, in particular, the			
	persons through whom all communications are to be made,			
	(d) any other matter required by the regulations.			
153D	Keeping of plan			
	A person who is required to prepare a pollution incident response management plan under this Part			
	must ensure that it is kept at the premises to which the relevant environment protection licence			
	relates, or where the relevant activity takes place, and is made available in accordance with the			
	regulations.			
153E	Testing of plan			
	A person who is required to prepare a pollution incident response management plan under this Part			
	must ensure that it is tested in accordance with the regulations.			
153F	Implementation of plan			
	If a pollution incident occurs in the course of an activity so that material harm to the environment			
	(within the meaning of section 147) is caused or threatened, the person carrying on the activity must			
	immediately implement any pollution incident response management plan in relation to the activity			
	required by this Part.			

POEO	(General) Regulation 2022
70	Definition
	In this Chapter—
	PIRM plan means a pollution incident response management plan required to be prepared under
	the Act, Part 5.7A.
71	Form of the Plan
	(A PIRM plan—
	(a) must be in written form, and
	(b) may form part of another document required to be prepared under or in accordance with
	another law if the information required to be included in the PIRM plan is readily identifiable as
	that information in that other document.
72(a)	Hazards:
	A description of the hazards to human health or the environment associated with the activity to
	which the licence relates
72(b)	Likelihood:
	the likelihood of any such hazards occurring, including details of any conditions or events that
	could, or would, increase that likelihood,
72(c)	Pre-Emptive Action:
	details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human
70(1)	health or the environment arising out of the relevant activity,
72(d)	Pollutant Inventory Types:
72(2)	an inventory of potential pollutants on the premises or used in carrying out the relevant activity,
72(e)	Pollutant Inventory Quantities:
	the maximum quantity of any pollutant that is likely to be stored or held at particular locations
72(f)	(including underground tanks) at or on the premises to which the licence relates, Safety Equipment:
/2(1)	a description of the safety equipment or other devices that are used to minimise the risks to human
	health or the environment and to contain or control a pollution incident,
72(g)	Staff Contacts:
, -(8)	the names, positions and 24-hour contact details of those key individuals who:
	(i) are responsible for activating the PIRM plan, and
	(ii) are authorised to notify relevant authorities under the Act, section 148, and
	(iii) are responsible for managing the response to a pollution incident,
72(h)	Authority Contact:
	the contact details of each relevant authority referred to in section 148 of the Act,
72(i)	Early Warnings Neighbours:
	details of the mechanisms for providing early warnings and regular updates to the owners and
	occupiers of premises in the vicinity of the premises to which the licence relates or where the
	scheduled activity is carried on,
72(j)	Staff Safety:
	the arrangements for minimising the risk of harm to any persons who are on the premises or who
	are present where the scheduled activity is being carried on,
72(k)	Maps:
	a detailed map, or set of maps, showing the location of the premises to which the licence relates,
	the surrounding area that is likely to be affected by a pollution incident, the location of potential
72/11	pollutants on the premises and the location of any stormwater drains on the premises,
72(I)	Early Warnings General:
	a detailed description of how any identified risk of harm to human health will be reduced, including
	(as a minimum) by means of early warnings, updates and the action to be taken during or
	immediately after a pollution incident to reduce that risk,

72(m)	Training of Staff:
	the nature and objectives of any staff training program in relation to the PIRM plan,
72(n)	Timing of Testing:
	The dates on which the PIRM plan has been tested and the name of the person who carried out the
	test,
72(o)	Updating of Plan:
	the dates on which the PIRM plan is updated,
72(p)	Plan Testing
	the manner in which the PIRM plan is to be tested and maintained.
74(1)	Availability of plan:
	(1) A PIRM plan is to be made readily available:
	(a) to an authorised officer on request, and
	(b) to a person who is responsible for implementing the PIRM plan at the premises—
	(i) to which the relevant licence relates, or
	(ii) where the activity takes place
74 (2)	Publishing Plan Parts:
	(2) A PIRM plan is also to be made publicly available in the following manner within 14 days after it
	is prepared:
	(a) in a prominent position on a publicly accessible website of the person who is required to
	prepare the PIRM plan,
	(b) if the person does not have such a websiteby providing a copy of the PIRM plan, without
	charge, to any person who makes a written request for a copy.
74(3)	Procedures under Act:
	3) Subclause (2) applies only in relation to that part of a PIRM plan that includes the information
	required under:
	(a) section 153C(a) of the Act, and
	(b) this Regulation, section 72(h) and (i) or 73(b)(ii) and (iii).
74(4)	Privacy Protection:
	(4) Personal information, within the meaning of the Privacy and Personal Information Protection
	Act 1998, is not required to be included in a PIRM plan made available to a person other than an
75(4)	authorised officer.
75(1)	Testing of the Plan –
	A PIRM plan must be tested— (a) routinely at least once every 12 months, and
	<ul><li>(b) if a pollution incident occurred during an activity to which an environment protection licence</li></ul>
	relates, which caused or threatened material harm to the environment, within the meaning of the
	Act, section 147—within 1 month of the incident occurring.
75(2)	Testing Outcomes:
, 3(2)	(2) The test must be carried out in a way to ensure the following—
	(a) the information included in the PIRM plan is accurate and up to date,
	(b) the PIRM plan is capable of being implemented in a workable and effective way.
75(3)	Matters Assessed
	(3) A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in
	light of the incident.