



Central Coast Council Kincumber Waste Management Facility

Pollution Incident Response Management Plan (PIRMP) Environment Protection Licence (EPL) – 6052

August 2023 edition V1.0

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Waste Management Coordinator
Environmental Coordinator
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1 Introduction and Purpose

This is the Kincumber 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:
 - Staff at the premises and in Council administration including onsite subcontractors.
 - Visitors and customers that might be impacted/ affected.
 - 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 13.

2.1 Preparation and Availability of the PIRMP

As Kincumber holds EPL 6052 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 Kincumber Waste Management Facility and be able to be provided to an authorised EPA Officer on request. Electronic versions are also available on the CCC website in the Environmental Programs and Management Section and in Content Manager, CCC central filing system.

2.2 Testing of the PIRMP

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:

"Pollution Incident" means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of 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:*
- it involves actual or potential harm to the health or safety of human beings or to ecosystems **that is not trivial**, or*
 - 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 Kincumber Waste Management facility operation below.

3.2 Pollution Incident Threat Levels

Level 1. Possible license report → Sub-Material Harm but may wish to report to EPA only as a license condition. Contact [REDACTED] and they will contact the EPA and other relevant authorities as required (refer to Appendix 15 – WHS 0049 Occurrence Hotline Poster).

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 → Reportable as material harm but **does not require a fire unit** on site (ring 1800 679 737 not 000). The incident can be adequately managed internally. The incident is still required to be reported to the [REDACTED] as well, making not that Fire and Rescue NSW has already been called).

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 neighbours of odour or dust are received but have also reported health issues such as vomiting or need to visit a doctor.
- Independent and non-vexatious complaints from neighbours 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 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. The incident is still required to be reported to the [REDACTED] as well, making not that 000 has already been called).

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 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.

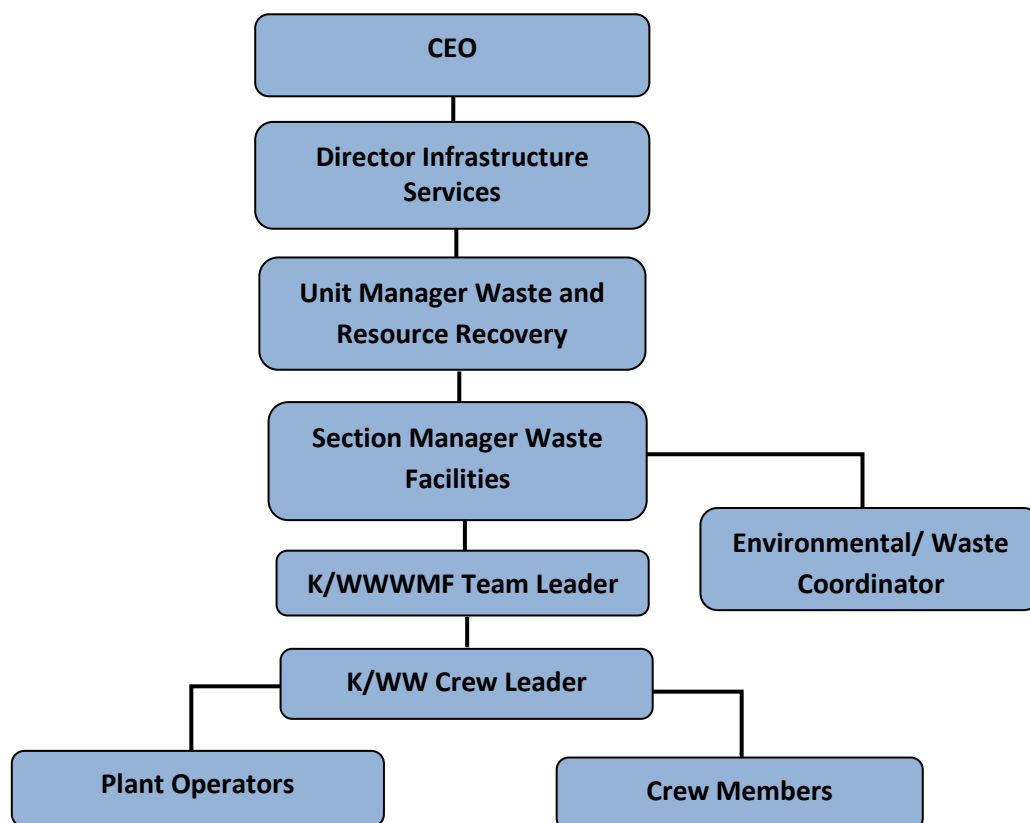
There are associated offences, for individuals and corporations, for not preparing a PIRMP, not keeping the PIRMP at the premises to which it relates, not testing the PIRMP in accordance with the Regulations and not implementing the plan in the case of an incident.

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

5 Kincumber Waste Facility Organisational Chart



As the site is currently closed key staff from the Woy Woy WMF will also be the key staff for the Kincumber WMF. A list of the key staff on-site at KWMF and WWWMF are listed in *Appendix 1: Pollution Incident Response Plan Details & Contracts*. 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.

This PIRMP refers to Site Manager throughout the document and is the person identified as overseeing day-to-day operations. The Site Manager will ordinarily be the K/WWWMF Team Leader or the Crew Leader in the event that the Team Leader is absent. Environmental or Waste Coordinator may act in this role from time to time in the event both the Team Leader and Crew Leader are absent.

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 “Kincumber Landfill – Emergency Response Plan” (refer to Document *ECMD14325288*, located within CM folder *ECMF17.187*) 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 clean-up of pollution during and after emergency services hands back site control to Council.

7 Relationship with On-site Subcontractors

Kincumber Waste Management facility also has one external company, which access areas of land within the facility:

1. LMS Energy Pty Ltd

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

1. Follow their own reporting procedures and CCC KWMF PIRMP.
2. Inform the Site Manager at K/WWWMF immediately of the incident
3. If a site evacuation is required follow the “*Kincumber Landfill Emergency Evacuation Plan*” and follow the instructions given by the Site Manager.

If there is an incident on-site at KWMF the Site Manager will also inform/ communicate with LMS Energy. A joint combat action on a pollution incident may be called. The subcontractors at K/WWWMF must be familiar with the CCC PIRMP.

8 Pollution Incident Response Procedure

1. Staff and Contractors are to inform the Crew Leader/ Team Leader (highest acting Site Manager in charge) immediately of Level 1, or 3 of a pollution incident/s.
2. In the absence of the Crew Leader/ Team Leader - Staff and subcontractors are to inform the Environmental Coordinator, Waste Coordinator or the Section Manager of Waste Facilities who will perform the role of the Site Manager (Appendix 1: Pollution Incident Response Plan Details & Contracts).

The Site Manager 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 of equipment/ infrastructure that is involved - e.g., is it 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 five agencies as in Section 9, **Table 1**.
 - **Levels 1, 2 & 3:** Contact the 24 hr [REDACTED] “Environmental Incident” (refer to Section 9 ure”).
3. If any staff are injured, attend to them first if it is safe to do so (refer to the Kincumber Landfill – Emergency Response Plan).
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 EMP Procedures.
6. If the incident involves a liquid which could potentially contaminate stormwater it must be prevented from entering waters or drain.
7. Inform onsite subcontractors (LMS) if the pollution incident may affect them e.g., changed traffic conditions/ smoke (Appendix 1: Pollution Incident Response Plan Details & Contracts).
8. Delegate the role of informing the neighbours via door knocking and notifying the Communications Section within CCC (“refer to Section 11 – Notify the Neighbours”).
9. If an area or site evacuation is required follow the Appendix 6: Map Two – Evacuation Plan “Kincumber Landfill Emergency Evacuation Plan”.
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 6052.
 - Reviewed within one month of a pollution incident occurring.

9 Pollution Incident Reporting Procedure

1. Site Manager must report ALL environmental incidents to the 24-Hour CCC Occurrence

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** below:

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)	1800 679 737
2	EPA Environment Line	131 555
3	Ministry of Health via the Public Health Unit – Gosford Officer (Ask for On-Call Nurse)	02 4320 2111
4	SafeWork NSW	131 050

NOTE: If the Site Manager or the Occurrence Hotline is unattended staff will need to report environmental pollution incidents directly to these Services.

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 6052, 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 neighbouring 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 neighbouring properties.

2. Delegate a member of staff to notify communications to place updates on CCC and social media websites. Please contact the following boundary neighbours and potential receptors in **Table 2** below:

Table 2: Neighbouring Properties within 0.5 km of Kincumber Waste Management Facility			
Property Address	Property Owner	Contact Name	Contact Number

Property Address	Property Owner	Contact Name	Contact Number

Responsible Officer:
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Property Address	Property Owner	Contact Name	Contact Number

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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:

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- 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
- Section 9, 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
Kincumber Waste Management Facility**

**PIRMP - Pollution Incident Response Management Plan
Appendix 1-15
Environment Protection License (EPL) - 6052**

APPENDIXCIES

1-15

(Quick Reference Information)

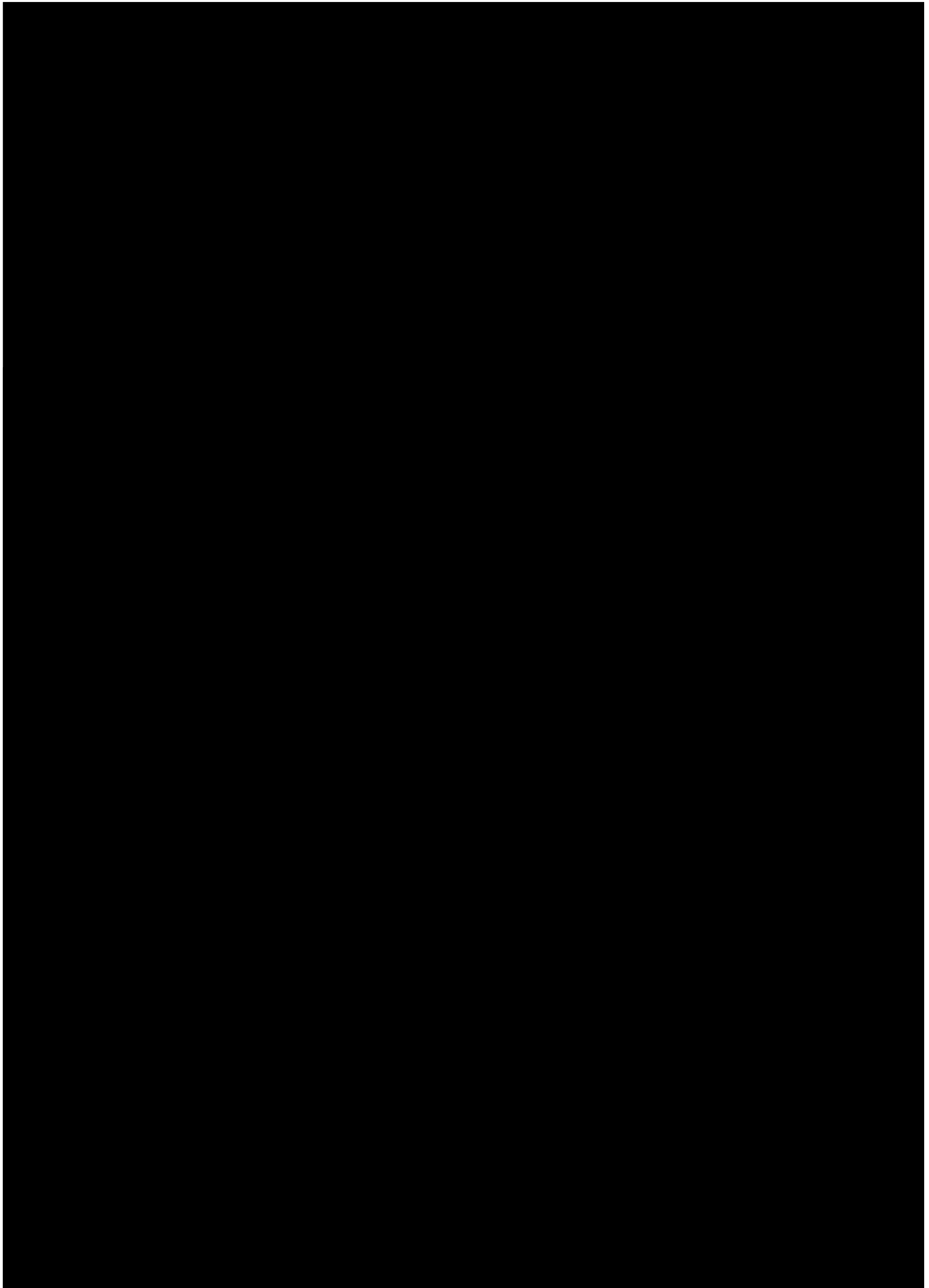
APPENDIX 1: Pollution Incident Response Plan Details & Contacts

Facility Name and Address:	
Kincumber Waste Management Facility Environment Protection Licence 6052 60 Cullens Road, Kincumber NSW 2251 - [REDACTED]	
Date of the Plan:	Review Plan by:
1 August 2023	As per Section 2.3
Date Plan Tested:	Re-test Plan by:
18/07/2023	18/07/2024
Plan Written by:	Plan Approved by:
[REDACTED]	

Central Coast Council Contacts			
Title	Name	Office Phone	Mobile
[REDACTED]			

[REDACTED]	
Police/ Ambulance	000
Fire – requiring a fire unit	000
Fire – NOT requiring a fire unit	1800 679 737
EPA Environment Line	131 555
Ministry of Health via Public Health Unit – Gosford (Central Coast LHD) Ph:	(02) 4320 9730
After hours:	(02) 4320 2111
SafeWork NSW	131 050
Ausgrid 24 Hour Emergency Line	13 13 88 (24 hours)
TransGrid Emergency Line	1800 027 253

APPENDIX 2: PIRMP Flowchart



APPENDIX 3: On-site Incident Management Resources

Inventory of Safety Equipment		
Location	Type of Equipment	No of Items

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

Notes to table:

Currently there are no pollutants stored on site at Kincumber WMF.

APPENDIX 4: Leachate and Sediment Pond Storage

Substance	Pond No.	Solid/Liquid/ Gas or Powder	Max Quantity	Location

APPENDIX 5: Map One - Location

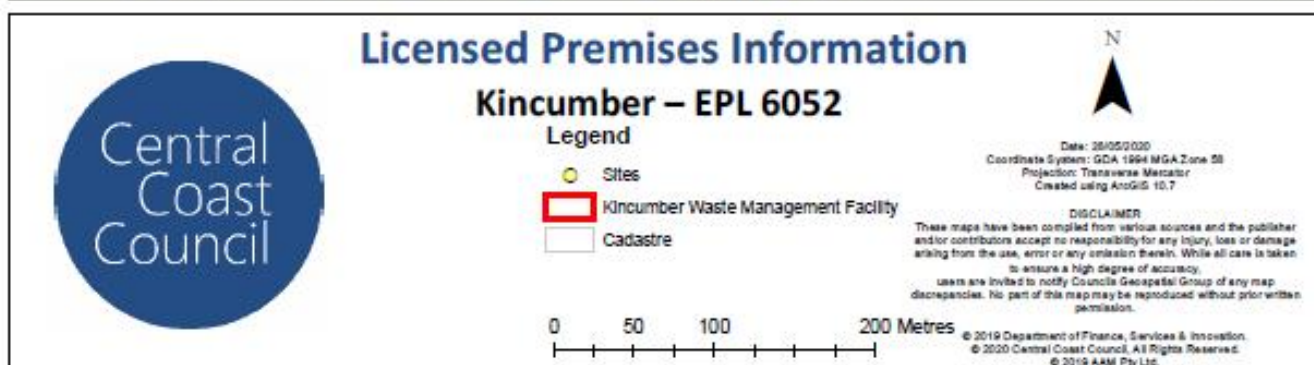
The Facility occupies Lot 1 of Deposited Plans (DP) DP124237 and Lot 64 of DP755234, and is located on Cullens Road, in the suburb of Kincumber, on the Central Coast. The site is approximately 20 hectares.

The Facility is currently closed to the general public and only open periodically for council community collection days. The site is accessed via Cullens Road in the North. The location of the Facility is shown in Figure 1 below.

The surrounding topography gently slopes from east to west towards Kincumber Creek which is located along the western boundary.

Kincumber Creek is located to the west of the landfill and Saltwater Creek is located to the east of the landfill. The creeks are freshwater. Kincumber Creek drains into Kincumber Broadwater which is approximately 1.9km to the west of the site whilst, Saltwater Creek drains into Avoca Lake which is approximately 1.5km to the north of the site.

The site is surrounded by low density residential, public recreation zoning and bushland.

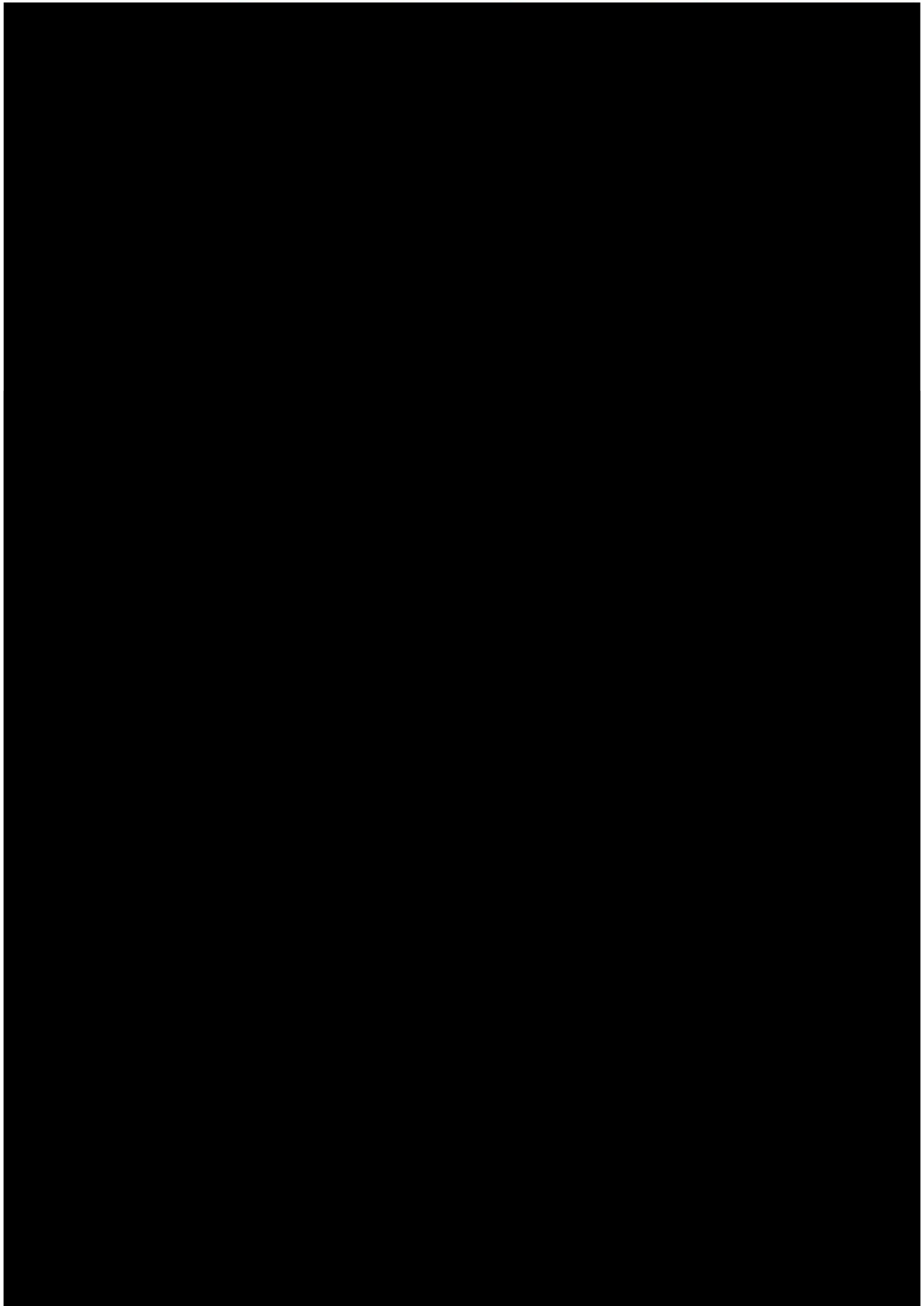


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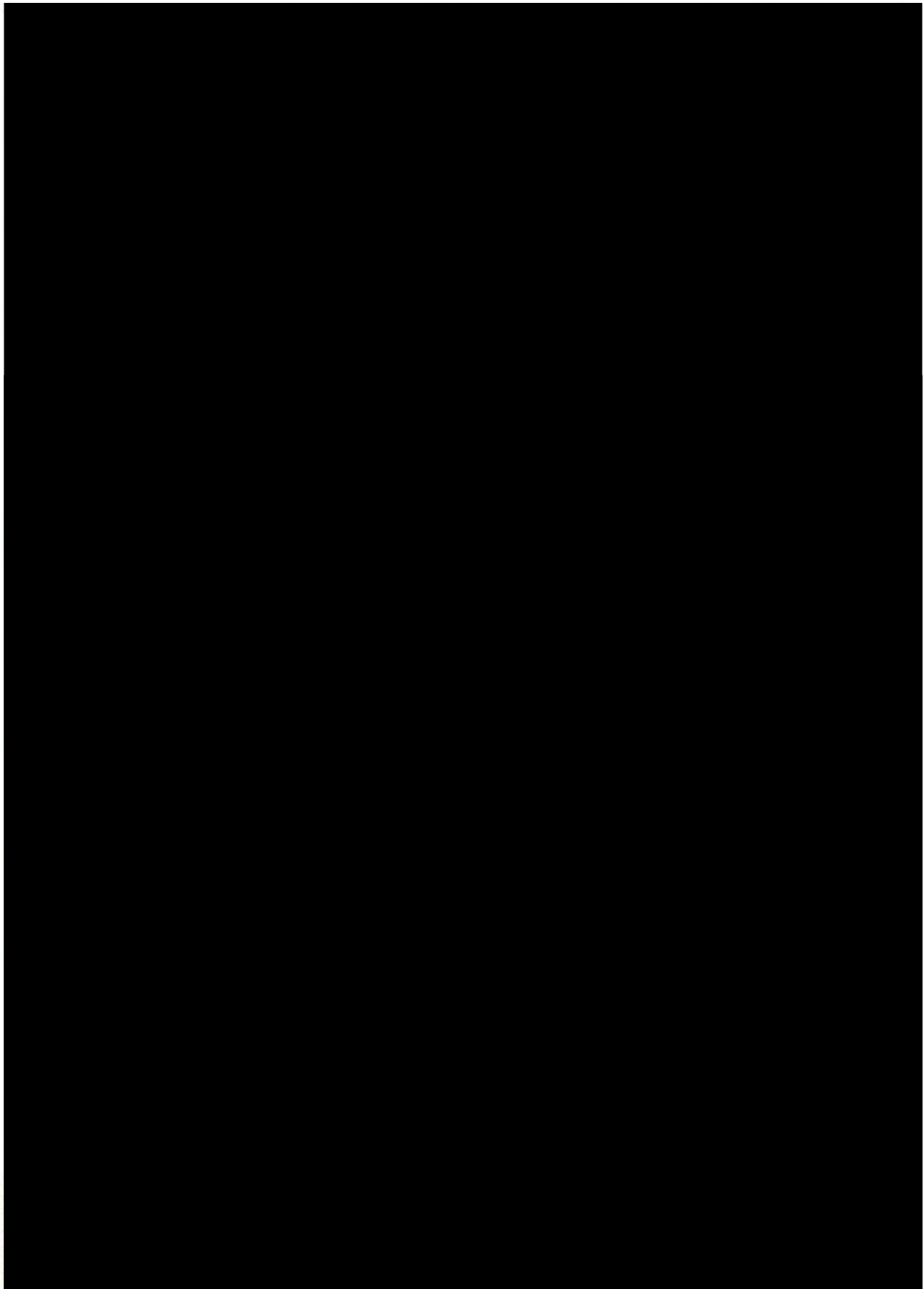
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 Environmental Coordinator
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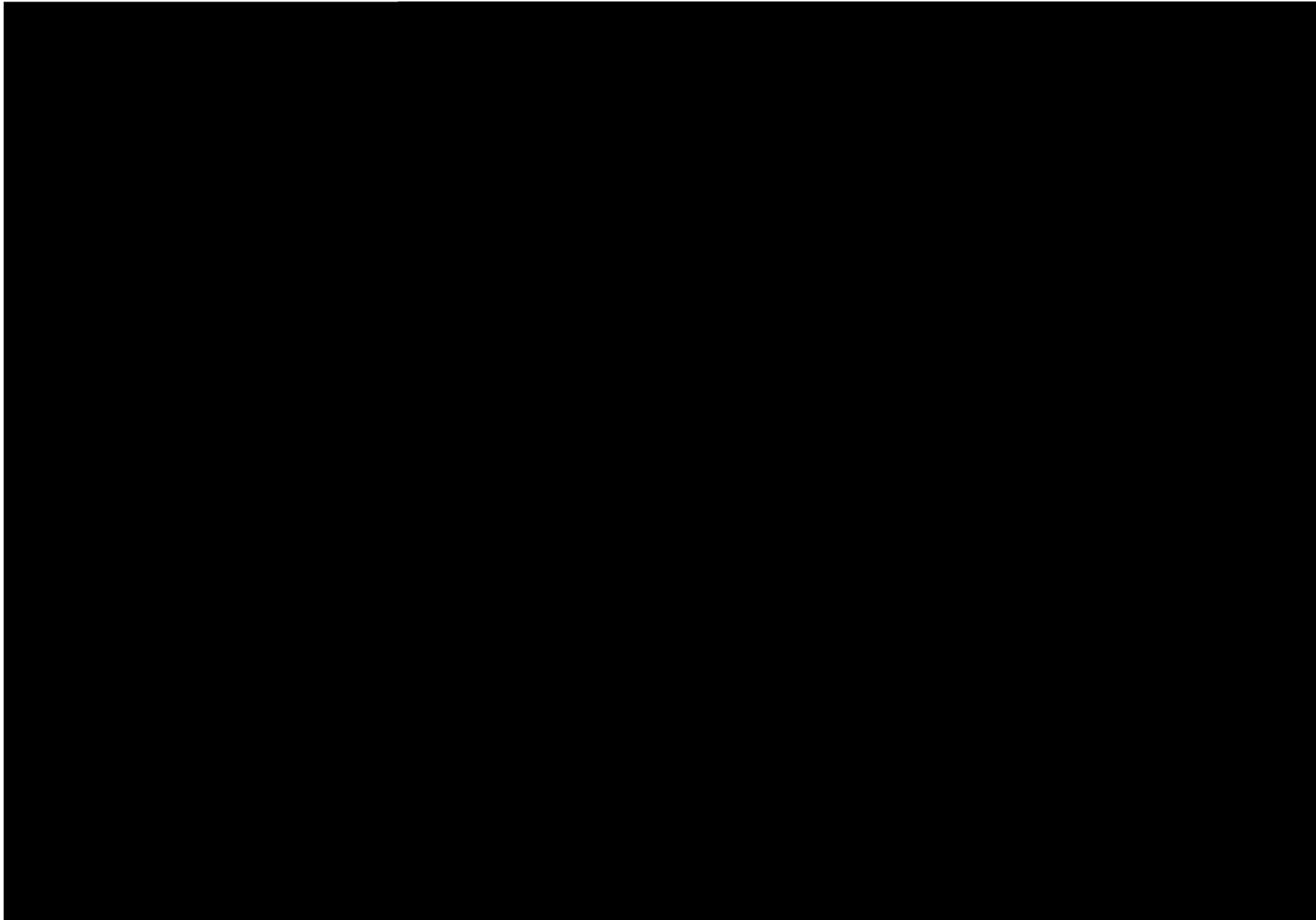
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APPENDIX 6: Map Two -Evacuation Plan



APPENDIX 7: Map Three - Environmental Monitoring (Ponds/ Monitoring Points)





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Approved by:

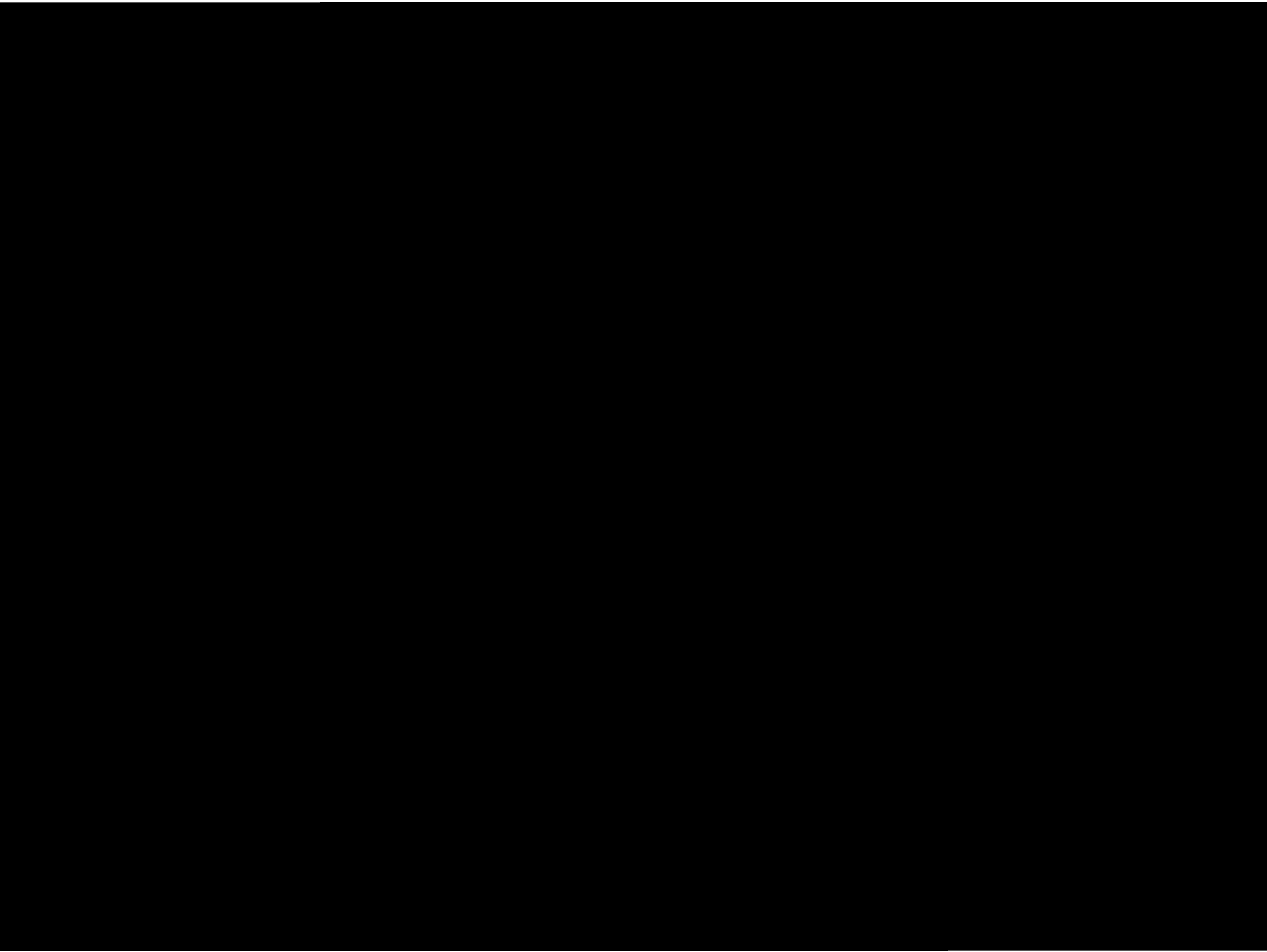
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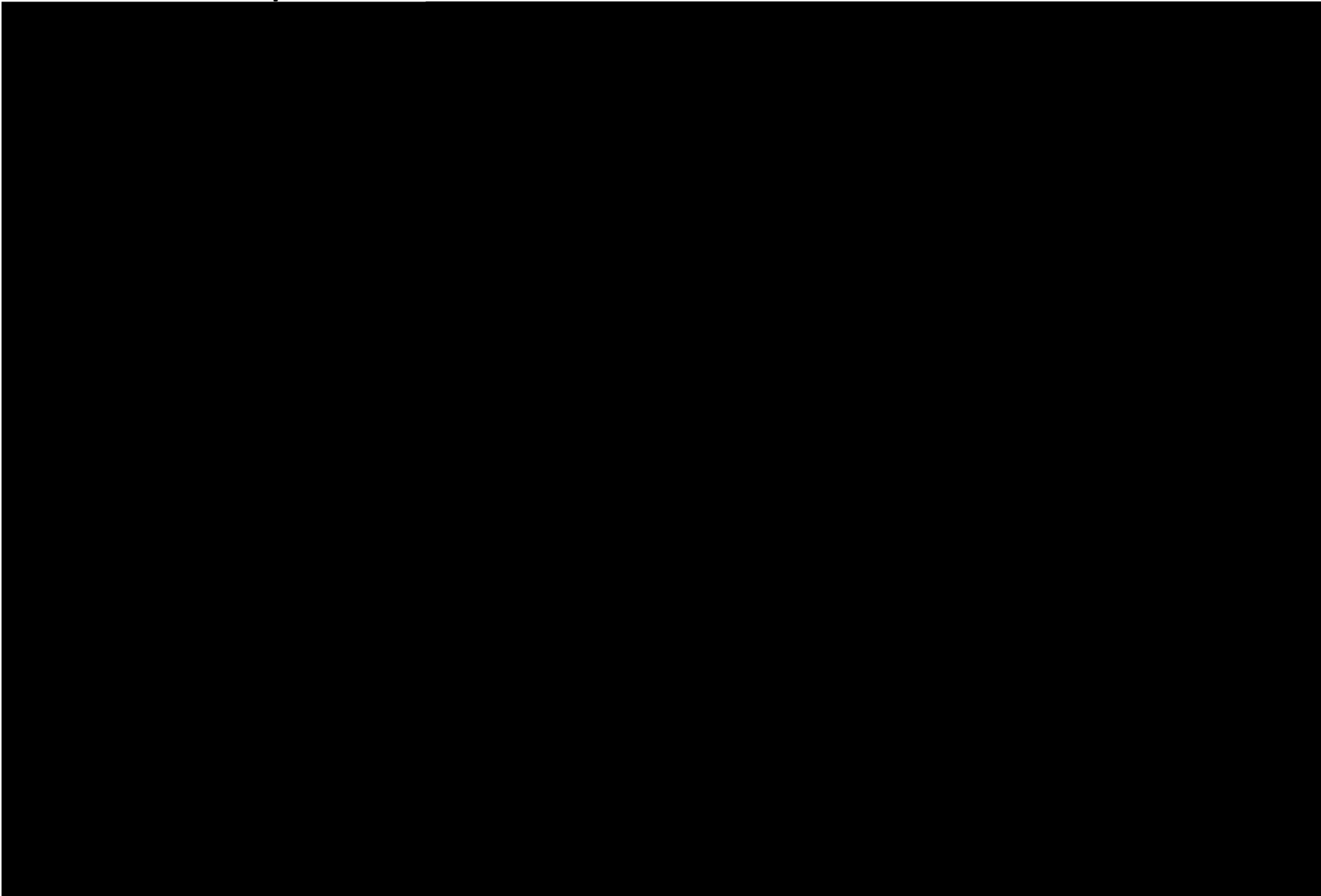


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APPENDIX 10: Map Local Areas Site overview



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18/07/2024

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APPENDIX 11: 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	<ul style="list-style-type: none"> Excessive periods of rain & poor maintenance of dam walls. 	<ul style="list-style-type: none"> Regular checking of leachate dams to prevent over topping. Alarm systems to alert if dams are too full. Earth moving equipment on site to undertake corrective actions. 	<p>Stop the flow by:</p> <ul style="list-style-type: none"> Place clay bund wall in the flow path of the leachate. Pump leachate to the leachate collection system, alternatively arrange for a tanker to cart the leachate to the treatment plant.
Bleed through cell wall	Unlikely	<ul style="list-style-type: none"> Excessive period of rain. 	<ul style="list-style-type: none"> Leachate management procedure in place. Barrier and collection system in place. Cell floor/ walls built to EPL requirements. Design filling plan to direct surface water away from the tipping face. Ensure leachate can penetrate through compacted waste to the leachate collection system e.g., remove intermediate capping between layers. 	<p>Repatch the wall by:</p> <ul style="list-style-type: none"> Excavate and drain leachate from bleed area, remove wet material and repair leak with suitable material. Monitor area to ensure the repair has been successful.

Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Leachate				
Leachate Pond Overflow	Unlikely	<ul style="list-style-type: none"> Excessive period of rain. 	<ul style="list-style-type: none"> Leachate management procedure in place. If the pond is nearing capacity arrange to either: <ul style="list-style-type: none"> Disposal via sewer access point. Transfer to another pond. Irrigate onto existing landfill area – must not exceed the absorption capacity of the area. Arrange leachate to be tankered around or off-site. All pump readings must be recorded on the 'Leachate Transfer recording form' and filed in the Leachate record folder. 	<ul style="list-style-type: none"> In the event of a leachate pond overflow (e.g., significant rainfall event): Attempt to control the overflow by placing a bund around the edge of the dam or in the flow path of the leachate overflow. Pump leachate to sewer access point. Pump leachate to alternative dam with sufficient capacity. Arrange tanker to transfer leachate around site or off site for disposal to sewer.
Groundwater Contamination by leachate	Possible	<ul style="list-style-type: none"> Excessive period of rain. 	<ul style="list-style-type: none"> Leachate management procedure in place. Quarterly Groundwater monitoring system in place. Barrier and collection system in place. Cell floor/ walls built to EPL requirements. 	<ul style="list-style-type: none"> Check leachate levels in waste cells to ensure levels are acceptable. Transfer leachate to leachate ponds if necessary. Try to determine the source of the contamination and eliminate. Seek expert advice.

Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Gas				
Emissions	Almost Certain	<ul style="list-style-type: none"> Excessive period of rain. 	<ul style="list-style-type: none"> Cells are all covered with capping material as per EPL requirements. Monthly surface gas monitoring. Quarterly sub-surface gas monitoring. Remediation procedures in place. 	Follow EMP 60 – “Management of Methane Gas at Waste Management Facility”.
Gas Collection System Leak	Unlikely	<ul style="list-style-type: none"> Excavation works in the vicinity. 	<ul style="list-style-type: none"> All gas infrastructure has been surveyed and is outlined in the Site Utilities Plan. Consult Site Utility Plan prior to any work commencing. Gas Extraction System operates under negative pressure. LMS construct system according to legislative requirements. 	Contact LMS immediately to: <ul style="list-style-type: none"> Shut down the Gas Extraction system. Carry out repairs.
Explosion	Rare	<ul style="list-style-type: none"> A build-up of gas in a confined space. Rapture of gas pipe/ creation of a spark. 	<ul style="list-style-type: none"> Gas Extraction and remediation system. Monthly surface gas monitoring. Quarterly sub-surface gas monitoring. Remediation procedures in place. 	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	<ul style="list-style-type: none"> • Container damaged. • Illegal dumping by customer. 	<ul style="list-style-type: none"> • Waste Screeners checking customer loads • EMP 65 – “Receipt and Management of Waste and Recyclables at Waste Management Facilities”. 	Contact the Site Manager who will coordinate incident response. Also Refer to the EPA’s <u><i>Community Recycling Centres Handbook – 2nd Edition.</i></u>
Exposure	Unlikely	<ul style="list-style-type: none"> • Container damaged. • Illegal dumping by customer. • Staff not wearing PPE. 	<ul style="list-style-type: none"> • EMP 65 – “Receipt and Management of Waste and Recyclables at Waste Management Facilities”. • Use default PPE in an emergency except for chemicals in containers. • SDS in Site Office. • Eye Wash Station/ Safety Shower/ PPE. 	Contact the Site Manager who will coordinate incident response.
Fire	Unlikely	<ul style="list-style-type: none"> • Container damaged. • Illegal dumping by customer. 	<ul style="list-style-type: none"> • Chemicals removed from waste and placed and stored in purpose built chemical storage shed. • EMP 65 – “Receipt and Management of Waste and Recyclables at Waste Management Facilities”. • Chemicals collected regularly by contractor. • Staff trained in dealing with hazardous chemicals. • Use of fire extinguishers. 	Contact the Site Manager who will coordinate incident response.
Sediment				
Overflow	Almost Certain	<ul style="list-style-type: none"> • Excessive period of rain. 	<ul style="list-style-type: none"> • Central Coast Council Guideline – “Erosion and Sediment Control” in Place. • Ponds cleaned out yearly. 	<ul style="list-style-type: none"> • Flocculate and release within 5 days of a rain event.

Responsible Officer:
Approved by:
Document review-by date:

Waste Management Coordinator
Environmental Coordinator
18/07/2024

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Potential Hazard	Likelihood of Hazard	Circumstances that could or would increase likelihood	Pre-emptive Actions to reduce hazard	Corrective Actions
Mud Tracking	Likely	<ul style="list-style-type: none"> Wet Weather. 	<ul style="list-style-type: none"> Central Coast Council Guideline – “Erosion and Sediment Control” in Place. Water cart regularly wash down roads/ vehicles in wet weather. Shaker grids/ wheel wash. 	<ul style="list-style-type: none"> Roads are washed down as required. Place gravel on roads to reduce mud.
Odour				
Affecting neighbours	Possible	<ul style="list-style-type: none"> Fire. Wet Weather. Lack of cover material. 	<ul style="list-style-type: none"> Follow EPL odour requirements. Monthly inspections undertaken by Environmental/ Waste Coordinators. 	<ul style="list-style-type: none"> Contact the Site Manager who will coordinate a response.
Noise				
Affecting Neighbours	Possible	<ul style="list-style-type: none"> Heavy machinery period of increased activity 	<ul style="list-style-type: none"> Follow EPL noise limit requirements. Machinery meets requirements. 	<ul style="list-style-type: none"> Immediately cease the noise generating activity.
Asbestos				
Exposure	Possible	<ul style="list-style-type: none"> Improperly wrapped asbestos. Machine driving over asbestos. Staff not wearing PPE. 	<ul style="list-style-type: none"> EMP 66 – “Safe disposal of small amounts of wrapped and unwrapped asbestos waste at Woy Woy Waste Management facility”. EMP 67 – “Disposal of Large Volumes of Asbestos at Woy Woy Waste Management Facility”. Guidelines for customers relating to asbestos booking and presentation. 	<ul style="list-style-type: none"> Follow EMP 66 – “Safe disposal of small amounts of wrapped and unwrapped asbestos waste at Woy Woy Waste Management facility”. EMP 67 – “Disposal of Large Volumes of Asbestos at Woy Woy 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	<ul style="list-style-type: none"> • Ignition source within waste load. • Person smoking onsite. 	<ul style="list-style-type: none"> • Inspect loads upon receipt. • No smoking is permitted onsite. • Compact and cover landfilled waste. • Keep stockpiles of flammable wastes to a minimum and isolated from tip face or other combustible materials. • Follow EMP 65 – “Receipt and Management of Waste and Recyclables at Waste Management Facilities”. • Follow EMP 58 – “Management of Landfill Fires at Waste Management Facilities”. 	<ul style="list-style-type: none"> • Contact the Site Manager who will coordinate incident response. • Follow EMP 58 – “Management of Landfill Fires at Waste Management Facilities”.
Fire water runoff from firefighting activities	Possible	<ul style="list-style-type: none"> • Large quantities of water used to fight fire. 	<ul style="list-style-type: none"> • Keep combustible waste materials in bunded areas or areas that runoff is captured. 	Contact the Site Manager who will coordinate incident response
Smoke impacts on persons onsite/ neighbours	Possible	<ul style="list-style-type: none"> • Type of material burning. • Location of persons. • Wind direction and strength. 	<ul style="list-style-type: none"> • Inspect loads upon receipt. • Keep people out of smoke. 	Contact the Site Manager who will coordinate incident response.

APPENDIX 12: Description of Hazards

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

APPENDIX 13: 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.*

Dissemination and Acknowledgement by staff			
I have read and tested these procedures and understand the plans requirements.			
Position	Name	Signature	Date

APPENDIX 14: PIRMP Legislative Basis

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: <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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 health or the environment arising out of the relevant activity.
72(d)	Pollutant Inventory Types: 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 (including underground tanks) at or on the premises to which the licence relates.
72(f)	Safety Equipment: 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: 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 pollutants on the premises and the location of any stormwater drains on the premises.
72(l)	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 website--by 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 authorised officer.
75(1)	Testing of the Plan – (1) A PIRM plan must be tested— (a) routinely at least once every 12 months, and (b) if a pollution incident occurred during an activity to which an environment protection licence 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: (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.

APPENDIX 15: Occurrence Hotline Poster

