



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

PORTLAND LANDFILL

Website Version

August 2021

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1 INTRODUCTION

1.1 Purpose

This Pollution incident response Management Plan (PIRMP) provides an emergency response and preventative strategy to effectively manage all significant safety and environmental emergencies at the **Portland Landfill, Portland Cullen Bullen Road, Portland.**

The PIRMP details:

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

The document has been prepared in accordance with:

- Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEA Act);
- Part 3A of the *Protection of the Environment Operations (General) Regulation 2009* (POEO Regulation); and
- Environmental Guidelines: Preparation of pollution incident response management plans (NSW EPA, March 2012)

The PIRMP also considers the document *Guideline: Pollution Incident Response Management Plans* (NSW EPA) that is currently a draft for public consultation.

2 SITE DETAILS

2.1 Site overview

The site details are:

Portland Landfill
Portland Cullen Bullen Road (entrance at E219,420, N6,307,430 on MGA56)
PORTLAND NSW 2790

Portland Landfill (the 'facility') has been operating since the early 1920's, and between 1935 and the 1970's was used for night soil disposal. The 11.71 hectare property is owned by Lithgow City Council.

The facility does not have planning approval as the operation pre-dates planning instruments. The Environment Protection Authority (EPA) has issued Environment Protection Licence 10936 in accordance with Section 5.7 of the Protection of the Environment Operations Act 1997. The licence does not place any restrictions on the total quantity of waste disposed at the premises, however it does specify the monitoring conditions.

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

Portland Landfill accepts solid wastes including putrescible wastes and other wastes approved by the EPA as shown in Table 1. Excluded waste types are detailed in Section 2.2.

2.2 Waste received

Under the EPA licence, wastes permitted to be received at the premises for waste disposal (application to land) are in accordance with Table 1 below.

Table 1 Permitted Wastes

Code	Waste	Description
NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time.
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time.
N220	Asbestos	As defined in Schedule 1 of the POEO Act, as in force from time to time.

It is noted that whilst the facility is licensed to accept asbestos, Council does not permit asbestos at the site.

The Portland Landfill **does not accept** the following types of wastes:

- Liquid wastes of any description (other than cement batching plant effluent, stone cutting slurry waste);
- Radioactive material, sharps, cytotoxic waste, bulk blood, body fluids, recognisable body parts, infectious waste, microbiological and pathological wastes, laboratory chemicals, poisons and pharmaceutical waste;
- Any inflammable liquid material derived from grease, oil, tar, petroleum, shale or coal;
- Any sludge or material (unless proven to be innocuous or harmless) being the refuse from any industrial process carried out in any tanning or leather processing plant, any petroleum or petrochemical plant, any chemical plant, any metal treatment plant, any paint-manufacturing plant;
- Any material containing arsenic, cyanide or sulphide;
- Any toxic soluble salt of barium, boron, cadmium, chromium, copper, lead, manganese, mercury, selenium, silver, zinc;
- Any pesticide or herbicide and in particular chlorinated hydrocarbons (organochlorins), fluorinated hydrocarbons, organophosphates, phenols;

- Any soluble acid or alkali, acidic or basic compounds; and
- Waste tyres.

If an excluded waste was to be discovered on the site, the Waste Facilities Controller would arrange for removal of the material by a contractor licensed to remove that material.

The camera at the site entrance would be used to identify the transporter for regulatory action. If significant quantities are involved Council would report to the EPA and liaise regarding regulatory action.

Waste tyres are removed and transported in small quantities to the Lithgow Solid Waste Facility for recycling.

If the waste is leaking, the local fire brigade would be contacted and requested to bring a drum for the containment of hazardous materials.

Signs defining excluded wastes and penalties for the deposition of excluded wastes are prominently displayed at the point of entry to the site.

3 POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

Table 2 provides a summary of the key risks on site.

Table 2 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 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 and/or a mechanical failure of the pump at the stormwater ponds.
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	Medium	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

4 INVENTORY OF POLLUTANTS AND MAXIMUM QUANTITIES

A list of pollutants and the maximum quantity stored on site is provided in Table 3 below.

Table 3 Inventory of Pollutants

Pollutant	Quantity	Storage Location
Stormwater (sediment laden water)	Up to ~3 ML	Stormwater Dam

Household hazardous waste such as fluorescent tubes, globes and smoke detectors, as well as clinical waste are not stored or even accepted at this site. Instead household hazardous waste is collected at the Council Depot within the city of Lithgow.

5 SAFETY EQUIPMENT

A water cart or water tank is not available at Portland Landfill and neither are fire extinguishers stored at the site. Instead soil is used to smother and extinguish fires. Each landfill cell is designed with a surround bund that is readily available for smothering fires if required.

Soil is also used as an absorbent for any fuel or oil spills. Spill kits (including socks, mats etc) are readily available at the following Council locations:

- 2 at Wallerawang Depot
- 3 at Lithgow Depot

These are not kept on site due to risk of being tampered. PPE is provided for on-site staff which consists of safety goggles and protective gloves.

Used spill sorb or soil is deposited in the landfill.

6 KEY PERSONNEL

The names, positions, contact details and responsibilities of key personnel responsible for managing a pollution incident are provided in Table 4.

Table 4 Key Personnel

Position	Name	24 hour contact details	Responsibility
Waste Facilities Controller	[details deleted]	[details deleted]	<ul style="list-style-type: none"> • First point of contact on site for any incident • Assisting emergency services on site
Senior Waste Facilities Controller	[details deleted]	[details deleted]	<ul style="list-style-type: none"> • First point of contact on site for any incident (when Waste Facilities Controller not available) • Coordinating and assisting emergency services on site • Assessing incident and ensuring site procedures followed. • Managing emergency response • Notifying incident to Waste & Recycling Coordinator where PIRMP response triggered or likely to have been triggered.
Waste & Recycling Manager	[details deleted]	[details deleted]	<ul style="list-style-type: none"> • Activating PIRMP • Liaison between site staff and office staff • Coordinating communication to neighbours • Notification of relevant authorities (under delegation) • Any follow-up reporting
Director Economic Development & Environment	[details deleted]	[details deleted]	<ul style="list-style-type: none"> • Activating PIRMP • Notifying relevant authorities (or delegating notification)
Customer Service	N/A	6354 9999	<ul style="list-style-type: none"> • Back up contact.

7 NOTIFICATION OF POLLUTION INCIDENT

7.1 Incidents requiring notification

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 1997:

“(a) harm to the environment is material if:

i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

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

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.”

7.2 Notification timeframe

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

7.3 Relevant authorities to be notified

Where the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the Director Economic Development and Environment (or delegate) in accordance with Table 5.

Table 5 Relevant Authorities to be Notified

Contact	Phone No.
Emergency Call Services	
Emergency Hotline Number (24 hours)	000*
City of Lithgow Council	
Waste & Recycling Manager	[details deleted]
Director Economic Development & Environment	[details deleted]
Council Emergency contact number (after hours)	02 6354 9999
Environment Protection Authority (EPA)	
Emergency Hotline Number (24 hours)	131 555
Bathurst Regional Office (optional)	02 6333 3800
Ministry of Health (via Public Health Units)	
Bathurst Regional Office	02 6330 5880
Public Health Officer on Call (24 hours)	[details deleted]
SafeWork NSW	
Hotline Number	131 050
Fire and Rescue NSW	
Lithgow Rural Fire Service	1300 729 579**

*The Waste Facilities Controller should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify Waste & Recycling Coordinator to commence notification process under the PIRMP.

**If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the site supervisor is still required to follow that outlined above except for dialling 000.

A summary of the above pollution incident notification procedure is provided as a flowchart in Appendix B.

7.4 Information to be notified

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

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;

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

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

A Pollution Incident Reporting Form is provided in Appendix C to assist in correctly recording and notifying the relevant authorities detailed in Section 7.3.

8 COMMUNICATION TO NEIGHBOURS

8.1 Identification of neighbours

Plan 01A_EV02 identifies the commercial, industrial and residential properties within 500m of the landfill.

8.2 Notification of neighbours

Where a pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with Section 7.

Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken in response to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site. This procedure would provide for early warning of any potential off-site impacts.

The most likely off-site impact would result from a fire. Depending on the nature and scale of the incident, emergency services (e.g. Fire and Rescue NSW) notified under the PIRMP will manage the notification process as needed.

Irrespective of whether the EPA directs Council to notify neighbours and depending on the circumstances of the particular pollution incident, Council may at their own discretion voluntarily choose to notify neighbours. In this situation Council would use the property details in Plan 01A_EV02 to obtain contact details for notification.

Notification will also include regular updates as required.

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

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

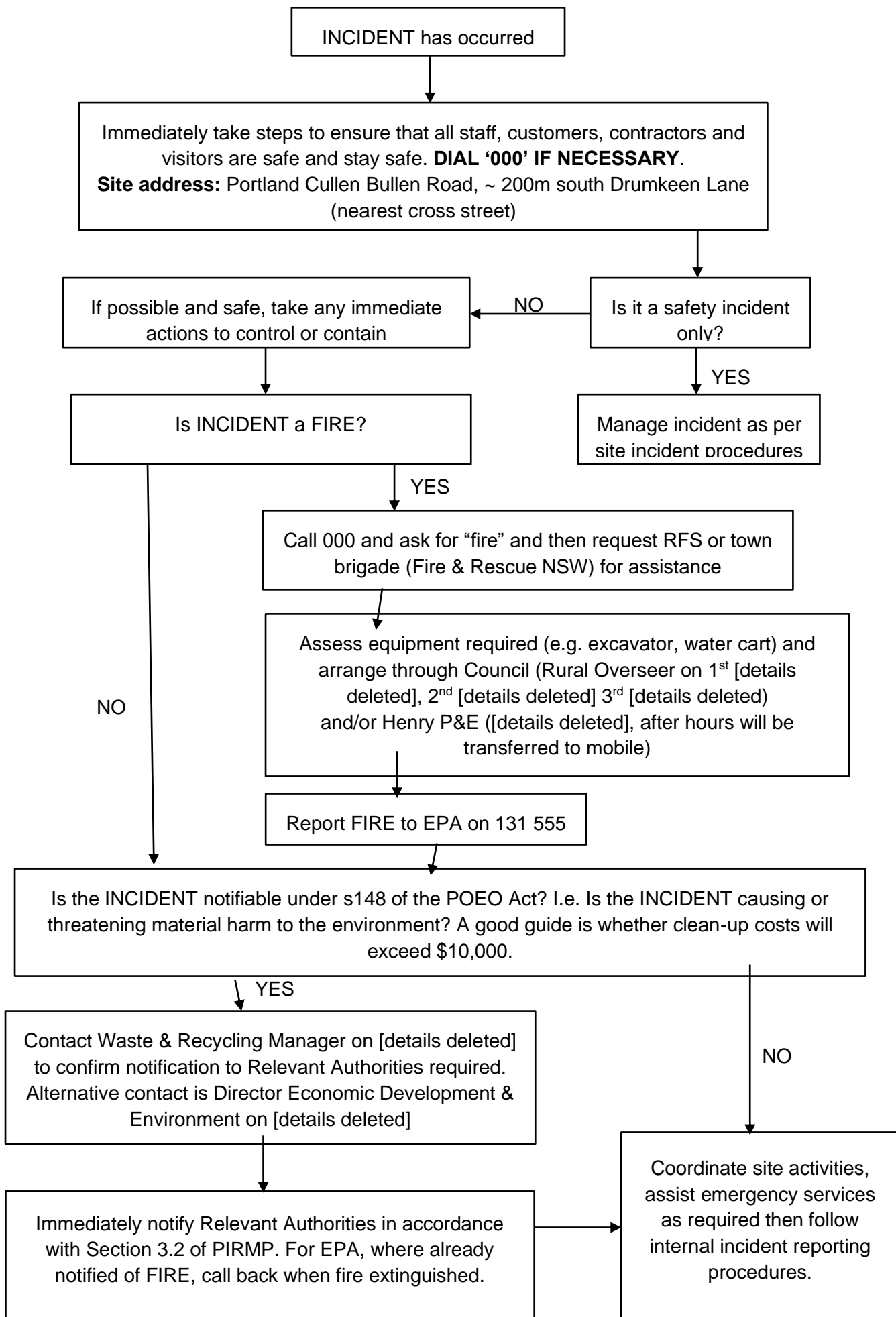
In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately. This could be through the use of a fire extinguisher or smothering with cover material.

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

If pollution is identified through groundwater or surface monitoring, the EPA will be notified and relevant actions taken at the time depending on the level of pollution.

Appendix A - Site Drawings

Appendix B – PIRMP Response Flowchart



Appendix C – Pollution Incident Reporting Form

Pollution Incident Reporting Form

INCIDENT NO:

TIME:

DATE:

DURATION OF INCIDENT:

NATURE OF INCIDENT:

TEMPERATURE:°C
.....KM/HR

WIND DIRECTION & SPEED:

RELATIVE HUMIDITY: %

RAINFALL SINCE 9AM:.....MM

FIRE DANGER RATING:

THE LOCATION OF THE PLACE WHERE POLLUTION IS OCCURRING OR IS LIKELY TO OCCUR:

THE NATURE, THE ESTIMATED QUANTITY OR VOLUME AND THE CONCENTRATION OF ANY POLLUTANTS INVOLVED (IF KNOWN):

THE CIRCUMSTANCES IN WHICH THE INCIDENT OCCURRED, INCLUDING THE CAUSE OF THE INCIDENT (IF KNOWN):

THE CORRECTIVE ACTION TAKEN OR PROPOSED TO BE TAKEN TO DEAL WITH THE INCIDENT AND ANY RESULTING POLLUTION OR THREATENED POLLUTION (IF KNOWN):

HAS COUNCIL BEEN NOTIFIED?	YES	NO
HAS ENVIRONMENT PROTECTION AUTHORITY (EPA) BEEN NOTIFIED?	YES	NO
HAS NSW MINISTRY OF HEALTH (VIA PUBLIC HEALTH UNITS) BEEN NOTIFIED?	NO	YES
HAS WORKCOVER NSW 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

Signature:

.....

Date:

Signature:

.....

Date:

Waste & Recycling Coordinator, City of Lithgow Council