POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

PORTLAND LANDFILL

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Version 11

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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 LEGISLATIVE REQUIREMENTS

The requirements for a PIRMP are set out in clause 153 of the POEO Act and clause 98 of the POEO Regulation.

Table 1 summarises the legislative requirements and references the relevant section in the PIRMP.

Table 1 Legislative Requirements

Clause	Requirement	Section in Plan
POEO Act		
153C(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	Section 8 Section 9

Clause	Requirement	Section in Plan
	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,	
153C(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,	Section 11
153C(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,	Section 8 Section 9
153C(d)	any other matter required by the regulations.	See POEO Regulation
POEO Regulation		
98 C (1) (a)	a description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity"),	Section 4
98 C (1) (b)	the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	Section 4
98 C (1) (c)	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,	Section 4
98 C (1) (d)	an inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Section 5
98 C (1) (e)	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,	Section 5
98 C (1) (f)	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,	Section 6
98 C (1) (g)	the names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the Act, and (iii) are responsible for managing the response to a pollution incident,	Section 0
98 C (1) (h)	the contact details of each relevant authority referred to in section 148 of the Act,	Section 8.3
98 C (1) (i)	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,	Section 9
98 C (1) (j)	the arrangements for minimising the risk of harm to any	Section 10

Clause	Requirement	Section in Plan
	persons who are on the premises or who are present where the scheduled activity is being carried on,	
98 C (1) (k)	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,	Appendix A
98 C (1) (l)	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,	Section 4 Section 9 Section 11
98 C (1) (m)	the nature and objectives of any staff training program in relation to the plan,	Section 12
98 C (1) (n)	the dates on which the plan has been tested and the name of the person who carried out the test,	Section 13
98 C (1) (o)	the dates on which the plan is updated,	Section 13
98 C (1) (p)	the manner in which the plan is to be tested and maintained.	Section 13

3 SITE DETAILS

3.1 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 2. Excluded waste types are detailed in Section 3.4.

3.2 Site characteristics

Portland Landfill is located approximately 2 km north of Portland (see drawing 01A_EV01). It comprises DP 755769 (Lots 156 and 157).

The area surrounding the facility to the north, south, east and west is open pasture land for livestock grazing purposes. The nearest residential property to the facility is located approximately 100m from the eastern boundary. Further details of neighbouring properties (residential, commercial and industrial categories) are provided in drawing 01A_EV02.

Access to the site is via Portland Cullen Bullen Road, which is a two lane sealed road. From Portland Cullen Bullen Road the facility is accessed by a formed gravel access road. Within the site, formed gravel access roads lead to the various defined tipping areas and processing pads. The central portion of the site is currently used for landfilling.

The facility is fenced along the southern, northern and western boundaries with 1m stock proof fence. The eastern boundary with Portland Cullen Bullen Road has a 2.4m man proof fence. A small storage shed, lunchroom and toilet is located within the site compound at the centre of the southern boundary and this is also secured with 2.4m man-proof security fence.

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

The site topography and drainage have been engineered to try to ensure that there is negligible stormwater runoff into the site, thus reducing any off-site impact. Most site generated surface water is channelled through the centre via a run-off control pond towards a sedimentation basin in the north- west corner of the site. The surface water then flows into the adjacent creek channel which flows along the northern boundary edge of the site and directly to Williwa Creek approximately 450m downstream.

Clean surface water generated from outside the premises avoids the landfill site itself by filtering into the adjacent creek channel which flows around the north and south site boundaries. The surface water then flows directly through to Williwa Creek approximately 500m downstream (see drawing 01A_EV02). This creek drains into the Turon River and ultimately the Macquarie River.

Groundwater is routinely monitored through a system of 9 piezometers at 4 locations around the landfill (see drawing PGD-MONIT_PLAN)

There is limited remnant natural vegetation over the site, although there are numerous mature trees remaining along the northern, western, south-western and eastern boundaries of the site. These trees act as visual and wind buffers. The central capped areas of the landfill have been revegetated with a perennial grass mix.

3.3 Site supervision and control

The facility is open to the public from 8.30am to 4.30pm 7 days a week and is only closed on Christmas Day and Good Friday. The site has a gate at the front that is unlocked and locked at the start and end of each day. (e.g. for special circumstances and emergency waste disposal) is subject to the approval of the Waste and Recycling Manager.

The site is an unsupervised rural landfill. Signage and a security camera are used to control incoming loads. The Senior Rural Tip Controller inspects the tipping area at the commencement and conclusion of each day.

The security camera can provide photographic evidence of vehicles entering and leaving the site. The security camera is used as an enforcement tool for:

- Out of area waste
- Commercial waste, Demolition Waste, Mattresses & Tyres (that should be taken to Lithgow Solid Waste Facility)
- Hazardous waste

No commercial or industrial waste vehicles are accepted at the facility. All vehicles arrive at the site and are directed by signage to the appropriate receival area of the landfill according to waste type. Council maintains the formed gravel access road from the facility entry to active landfill face.

Whilst asbestos is not accepted at the facility, any asbestos or suspected asbestos identified is taken to the active landfill cell and immediately covered with waste or soil.

3.4 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 2 below.

Table 2 Permitted Wastes

Code	Waste	Description
T140	Tyres	As defined in Schedule 1 of the POEO Act, as in force from time to time.
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 and tyres, Council does not permit asbestos and tyres 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.

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.

4 RISKS TO ENVIRONMENT AND HUMAN HEALTH (INCLUDING PRE-EMPTIVE ACTIONS)

4.1 Introduction

The following section outlines current operational procedures and design intended to minimise and manage risk. Members of staff working on site are responsible for being aware

and notifying the Site Supervisor of any potential pollution incidents on the premises. All management procedures detailed within the LEMP must be adhered to.

4.2 Pre-emptive actions

4.2.1 Identifying non-domestic quantities of hazardous substances

The following practices apply to screening of incoming wastes:

- Public access is only permitted during opening hours;
- Drivers are asked to describe the type of waste to be deposited on entry to the facility;
- Inspections of waste loads are made when required;
- Drivers are directed to the correct area of the facility for disposal of specific loads (e.g. builder's wastes, greens, whitegoods, tyres etc.);
- Wastes are monitored and inspected as they are being discharged to ensure excluded non- approved wastes are not being disposed; and
- Wastes are monitored and inspected during spreading, compaction and covering.

The following steps are undertaken if non-domestic quantities of hazardous wastes are identified.

- If identified at point of entry the vehicle is refused entry and the driver advised to contact the EPA for advice on proper disposal of the hazardous waste;
- If identified during waste deposition site staff would advise the driver that the waste is not acceptable and organise for the waste to be loaded back onto the vehicle, where practicable and safe to do so. Site staff would then escort the load off-site and advise the driver to contact the EPA for advice in the proper disposal of the excluded waste; and
- If identified during waste spreading and compaction plant operators would advise the Senior Waste Facilities Controller. Site staff would make all practicable efforts to identify the source of the waste (e.g. labelling, waste type). The hazardous waste will be disposed of in accordance with the EPA's requirements. In the event that the EPA cannot be contacted, the wastes will be relocated to a safer and more isolated part of the site.

In all the above cases the incident would be reported to the EPA.

4.2.2 Surface or subsurface fires

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

- A security entrance gate to prevent unauthorised access and acts of vandalism;
- Maintaining machinery in good working order to minimise risk of sparks;
- Smothering immediately with soil;
- Adequately compacting and covering waste;
- Mulched green waste has the capacity to spontaneously combust. This risk is minimised via shaping into divided windrows (i.e. small cones) to isolate/contain any fires;
- Regular litter patrols;

- Ensuring fire breaks are maintained around any temporary stockpile of combustibles; and
- Accepting only permitted wastes.

4.2.3 Mixing of waste and stormwater

The potential for the mixing of waste and stormwater is controlled by ensuring that the detention ponds and sedimentation basin are regularly checked and maintained.

4.2.4 Detection of subsurface gas, surface gas and/or accumulated gas in buildings

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

4.2.5 Acts of vandalism or target of terrorist activity

The site entrance gates and boundary fencing limits unauthorised access outside operational hours. All staff are required to be vigilant and aware that the site is a potential target for vandalism, particularly by arsonists.

4.3 Inventory of maintenance pollutants

No maintenance pollutants such as diesel fuel are stored on site. Instead the routine servicing of vehicles and machinery necessary for operations at the facility is undertaken off-site.

4.4 Identifiable waste pollutants

No identifiable waste pollutants are accepted or stored on the premises. 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.

4.5 Potential pollution incidents

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

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

It is possible that dumping of hazardous waste may occur outside the boundary, but in close visual proximity to the site outside of normal operational hours. In this instance, if the pollution is a risk of material harm to the environment and/or human health then the local fire brigade should be contacted immediately. The initial response to the pollution and assessment of the situation thereafter will be managed by the local fire brigade. Refer to PIRMP Response Flowchart in Appendix A for details. The table below refers to useful contractor contacts.

Table 3 Useful Contractor Contacts

Contractors	
Cleanaway - Emergency clean-up	131 319
Cleanaway – Motor oil	
Environmental Treatment Solutions – Safe Chemical disposal	1300 133 583

4.6 Likelihood, impact and contributing factors to pollution incidents occurring

Incidents can be classified as being of low, medium or high risk of occurring (likelihood) based on the past history of the facility, an assessment of management procedures, staff training and site layout.

The impact of an incident can be classed as low, medium or high based on the potential extent of offsite harm to humans and/or the environment.

4.6.1 Identifying non-domestic quantities of hazardous substances

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

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

Contributing Factors – Human errors made during waste screening.

4.6.2 Surface or sub-surface fires

4.6.2.1 Active Landfill

Medium Likelihood– The site often deals with the sorting and deposition of combustible waste and so the likelihood of a fire within the active landfill area is relatively high, for example kerbside collection can include household fire embers and mulch can self-combust.

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

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

4.6.2.2 Maintenance and Inactive Areas

Low Likelihood –Potential accelerants such as maintenance chemicals and fuels are not stored on- site.

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

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

4.6.3 Mixing of waste and stormwater

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

Medium Impact – the site has a protective system of drainage and holding ponds which is likely to contain and prevent the immediate spread of surface water and waste outside of the premises. However, the impact is considered to be medium due to the close proximity of the northern boundary creek and Williwa Creek to the site. Any pollutants which manage to reach the creek could cause harm to properties and environmental habitats for some distance downstream.

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

4.6.4 Identification of any failure of an environmental protection system

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

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

Contributing Factors – Prolonged periods of heavy rain and/or a mechanical failure of the pump at the stormwater collection dams may result in the surface water flowing directly into adjacent northern creek and Williwa Creek system without first being deposited back onto the active landfill cell.

4.6.5 Identification of a significant difference in groundwater indicator parameters

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

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

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

4.6.6 Detection of subsurface gas, surface gas and/or gas accumulated in buildings

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

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

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

4.6.7 Acts of vandalism or target of terrorist activity

Medium Likelihood – The site is not enclosed by secure fencing or monitored by CCTV, and during hours of closure is not patrolled by security guards. Although the site is of limited strategic value as a potential target for terrorism, the premises may prove attractive to arsonists as it is isolated from habited areas, has inadequate security and deals with the sorting and deposition of combustible waste.

Medium Impact – the site is surrounded by open pasture areas susceptible to fire.

Contributing Factors –Increased risk during hours of closure and during sustained periods of hot and dry weather.

4.6.8 Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions

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

Low Impact – The site has significant and advanced environmental protection measures and monitoring schedules which are likely to identify, contain and prevent the immediate spread

of environmental hazards outside of the premises even outside of normal operating conditions.

Contributing Factors – N/A.

Table 4 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,	Low	Low	On-site buildings which have not been

surface gas and/or accumulated gas in buildings at greater than 1.25 per cent methane (volume for volume)			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

5 INVENTORY OF POLLUTANTS AND MAXIMUM QUANTITIES

A list of pollutants and the maximum quantity stored on site is provided in Table 5 below.

Table 5 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.

6 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.

7 KEY PERSONNEL

The names, positions, contact details and responsibilities of key personnel responsible for managing a pollution incident are provided in table 6.

Table 6 Key Personnel

Position	Name	24 hour contact details	Responsibility
Waste Facilities Controller	[redacted]	[redacted]	• First point of contact on site for any incident • Assisting emergency services on site
Senior Waste Facilities Controller			• 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			• Activating PIRMP • Liaison between site staff and office staff • Coordinating communication to neighbours • Notification of relevant authorities (under delegation) • Any follow-up reporting
Executive Manager Water & Wastewater			• Activating PIRMP • Notifying relevant authorities (or delegating notification)
Customer Service	N/A	6354 9999	• Back up contact.

8 NOTIFICATION OF POLLUTION INCIDENT

8.1 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."*

8.2 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.

8.3 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 7.

Table 7 Relevant Authorities to be Notified

Contact	Phone No.
Emergency Call Services	
Emergency Hotline Number (24 hours)	000*
City of Lithgow Council	
Waste & Recycling Manager	
Executive Manager Water & Wastewater	
Council Emergency contact number (after hours)	02 6354 9999
Environment Protection Authority (EPA)	
Emergency Hotline Number (24 hours)	131 555
Bathurst Regional Office (optional)	
Ministry of Health (via Public Health Units)	
Bathurst Regional Office	
Public Health Officer on Call (24 hours)	
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.

8.4 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 8.3.

9 COMMUNICATION TO NEIGHBOURS

9.1 Identification of neighbours

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

9.2 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 8.

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. If neighbours are required to be provided early warning notification, this would be conducted via a door knock.

Notification will also include regular updates as required.

10 MINIMISING HARM TO PERSONS ON THE PREMISES

In the event of a pollution incident occurring, all members of the public, site contractors and other Council staff will be mustered by site staff to the Emergency Assembly Point at the site entrance (identified on Site Plan 07A_EV03), after which they will be safely evacuated from site where appropriate.

11 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.

This process minimises the risk of harm to the public, site contractors and other Council staff.

12 STAFF TRAINING

All staff working on site are to be trained in the use of the PIRMP.

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

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

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

Regular site briefings and toolbox meetings should be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to on-site safety procedures.

13 PIRMP TESTING AND UPDATE

In accordance with clause 98E of the POEO Regulation, the PIRMP will be tested at least annually or within 1 month of a pollution incident occurring.

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

As part of the annual testing the PIRMP will be reviewed and updated as required.

A register of testing and updating is provided in Table 8 below.

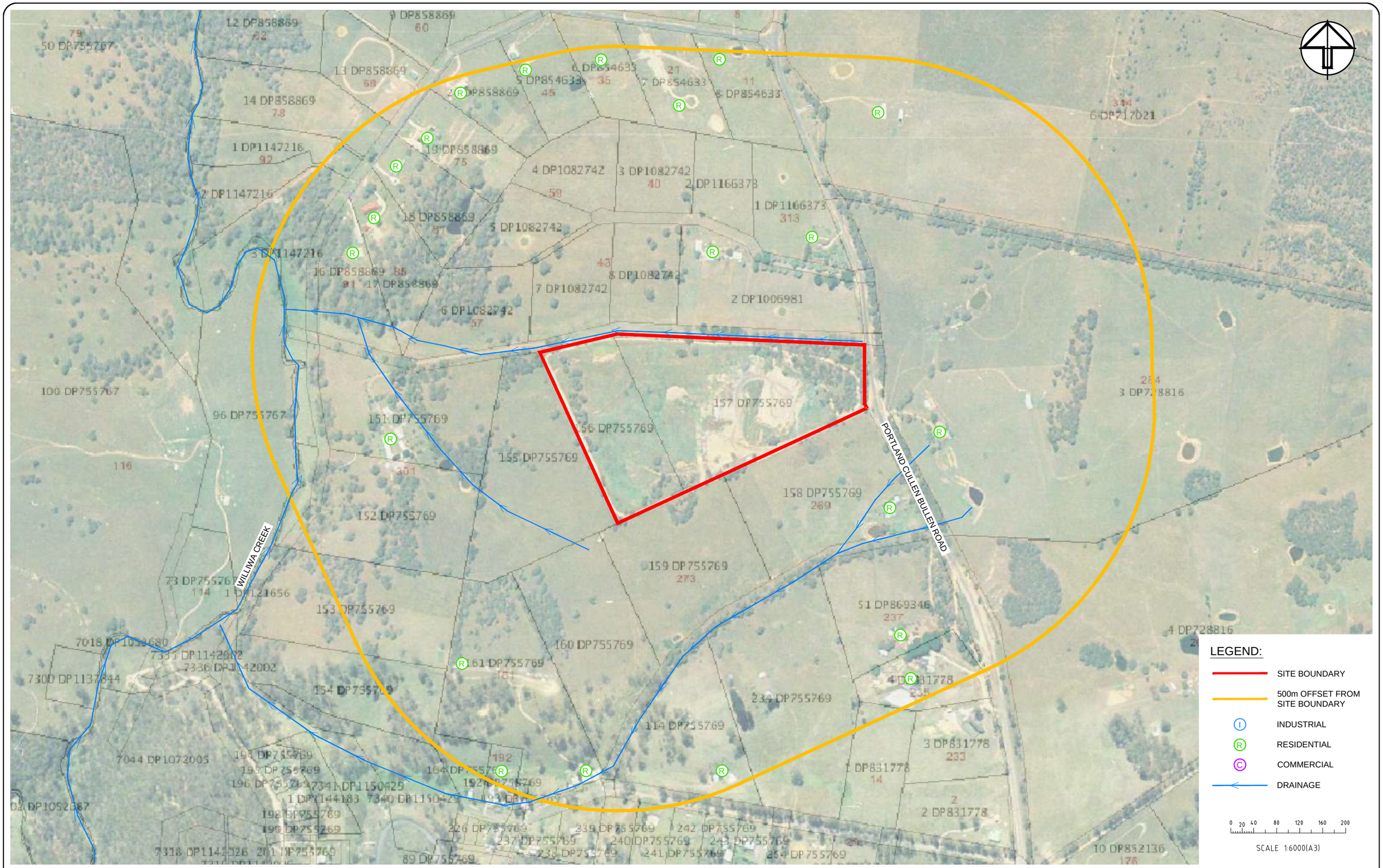
Table 8 Register of Testing and Updating

Date tested	Personnel	Date PIRMP updated	Version No.
07/08/2017			4
16/08/2018			5
14/08/2019			6
11/08/2020			7
28/07/2021			8
4/08/2022			9
10/08/2023			10
06/08/2024			11

Appendix A - Site Plans

SITE PLAN – PORTLAND GARBAGE DEPOT

BASE IMAGE OCTOBER 2023



GEOLYSE
ORANGE
orange@geolyse.com
www.geolyse.com
154 PEISLEY STREET
P.O. BOX 1963
ORANGE, NSW 2800
Ph. (02) 6393 5000
Fx. (02) 6393 5050

No	DATE	DRAFTING CHECK	PM CHECK	DETAILS
A	17/08/12	LRP	TAS	ISSUED TO CLIENT

PROJECT

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
PORTLAND WASTE DISPOSAL DEPOT

FILE REFERENCE: 212225_01A_EV01-EV03.dwg

APPROVAL AUTHORITY

CLIENT

LITHGOW CITY COUNCIL
180 MORT STREET,
LITHGOW NSW 2790

DRAWING

PLAN OF NEIGHBOURS

PROJECT NUMBER: 212225 DRAWING NUMBER: 01A_EV02 REV. A

SOURCE: http://imagery.maps.nsw.gov.au/

NOTE: COORDINATES ARE IN MGA 56

Site	EPA Pt	Description	Alt_m (ground)	Easting	Northing
SW1	1	Surface water	912.70	218960.96	6307504.51
MP1	3	Groundwater	914.00	219008.27	6307520.99
MP2	4	Groundwater	913.40	218987.43	6307509.94
MP3	5	Groundwater	913.70	218973.74	6307499.41
MP5	6	Groundwater	937.20	219240.13	6307344.26
MP8	7	Groundwater	912.00	219016.68	6307560.50
MP9	8	Groundwater	904.00	218821.69	6307534.80

LEGEND

- LANDFILL BOUNDARY
- SW1 — SURFACE WATER MONITORING LOCATIONS
- MB1 — MONITORING BORE LOCATIONS

IMAGERY DATED - OCT 2023

MGA55

CEH SURVEY
CONSULTING LAND, ENGINEERING AND MINING SURVEYORS
"Astrolabe" 1 Rutherford Lane,
LITHGOW 2790
ABN: 68 056 544 551 Office: (02) 6351 2281
Email: survey@ceh.com.au Website: www.ceh.com.au

DATE	12-05-2022
AMENDED	06-06-2022
SURVEYOR	TH
DRAWN	TH
CHECKED	

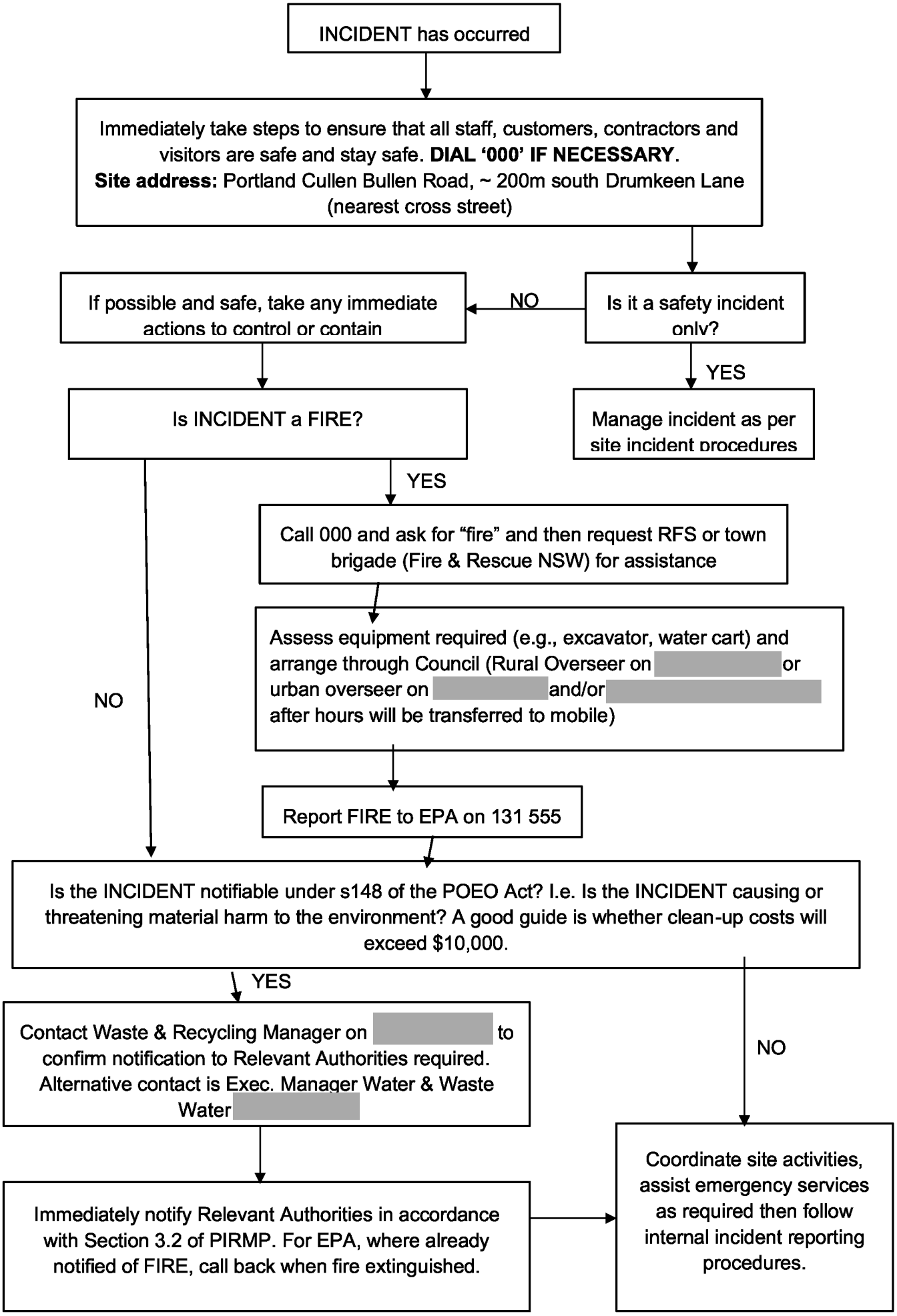
CLIENT: LITHGOW CITY COUNCIL
CEH REF: 3/1939TH
SURVEY: MONITORING PLAN
PROPERTY: PORTLAND GARBAGE DEPOT
LOCALITY: PORTLAND/CULLEN BULLEN RD, PORTLAND

SCALE - 1:2000(A3) DATUM: A.H.D.

DRAWING No:

PGD-MONIT_PLAN

Appendix B – PIRMP Response Flowchart


INCIDENT has occurred
Immediately take steps to ensure that all staff, customers, contractors and visitors are safe and stay safe. DIAL '000' IF NECESSARY.
Site address: Portland Cullen Bullen Road, ~ 200m south Drumkeen Lane (nearest cross street)
Is it a safety incident only?
NO
If possible and safe, take any immediate actions to control or contain
YES
Manage incident as per site incident procedures
Is INCIDENT a FIRE?
YES
NO
Call 000 and ask for "fire" and then request RFS or town brigade (Fire & Rescue NSW) for assistance
Assess equipment required (e.g., excavator, water cart) and arrange through Council (Rural Overseer on [redacted] or urban overseer on [redacted] and/or [redacted] after hours will be transferred to mobile)
Report FIRE to EPA on 131 555
Is the INCIDENT notifiable under s148 of the POEO Act? I.e. Is the INCIDENT causing or threatening material harm to the environment? A good guide is whether clean-up costs will exceed $10,000.
YES
NO
Contact Waste & Recycling Manager on [redacted] to confirm notification to Relevant Authorities required. Alternative contact is Exec. Manager Water & Waste Water [redacted]
Immediately notify Relevant Authorities in accordance with Section 3.2 of PIRMP. For EPA, where already notified of FIRE, call back when fire extinguished.
Coordinate site activities, assist emergency services as required then follow internal incident reporting procedures.

Appendix C – Pollution Incident Reporting Form

Pollution Incident Reporting Form

INCIDENT NO:	**TIME:**
DATE:	**DURATION OF INCIDENT:**

NATURE OF INCIDENT:

TEMPERATURE: .....°C **WIND DIRECTION & SPEED:** .....KM/HR

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?	YES NO	
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