



Pollution Incident Response Management Plan

EPL 6780: Waste Disposal by Application to Land – Goulburn Waste Management Centre

Licensee: Goulburn Mulwaree Council
Address: Locked Bag 22, Goulburn NSW 2580
Telephone: (02) 4823 4444
Email: council@goulburn.nsw.gov.au

Version Control

List of relevant dates and amendments:

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1.0 Introduction

The POELA Act introduces several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act includes a new requirement under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) to prepare, keep, test and implement a pollution incident response management plan.

The objectives of these plans are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW)¹ and 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

2.0 Purpose

The purpose of the plan is to:

- Outline how the risk of a pollution incident will be minimised and controlled through the identification of risks and the development of planned actions to minimise and manage those risks.
- Document the notification protocol to ensure comprehensive and timely communication about a pollution incident is provided to all relevant stakeholders.
- Ensure the risks associated with the activity are mitigated, to ensure the protection of workers, community and the environment.
- Ensure compliance with all legislative requirements.

3.0 Scope

The plan applies to the operation of the Goulburn Waste Management Centre, located at 100 Sinclair Street, Goulburn NSW 2580. The EPA Licence for this facility is 6780. Figure 3.1 visually identifies the location of this facility.



Figure 3.1 – Goulburn Waste Management Centre

4.0 Incident Reporting

4.1 Legal Duty to Notify

It is the responsibility of all employees and contractors of the Goulburn Mulwaree Council, who are engaged in any work activity at the Goulburn Waste Management Centre, to notify management personal of all environmental incidents and hazards which may result in an environmental incident, regardless of the nature or scale.

Notification responsibilities are detailed under the POEO Act (Section 148), which encompasses all site personal, including contractors and subcontractors. These can be categorised as follows (extracts taken from section 148 of POEO Act):

- Duty of employee engaged in carrying on activity to notify A person engaged as an employee in carrying on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority.
- Duty of employer to notify Without limiting subsection (2), an employer who is notified of an incident under subsection (3) or who otherwise becomes aware of a pollution incident which is related to an activity of the employer, must, immediately after being notified or otherwise becoming aware of the incident, notify each relevant authority of the incident and all relevant information about it.

4.2 Incident Definition

The definition of a pollution incident, as taken from the POEO Act, is:

“an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

(a) harm to the environment is material if:

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

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

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

4.3 Incident Reporting

And incident that causes or threatens material harm to the environment shall be communicated to the OEH as soon as practicable after first becoming aware of the incident. Initial contact will be via the 24hour **OEH Pollution Hotline (133 555)**. Written notice shall follow within 7 days. Examples of incidences which require reporting may include but are not limited to:

- Identification of non-domestic quantities (200ml or g) of hazardous waste mixed amongst solid waste;
- Fires at the landfill;
- Missing of leachate and stormwater or waste and stormwater;
- Identification of any failure of an environmental protection system;
- Identification of a significant difference in groundwater indicator parameters;
- Detection of subsurface gas migration in perimeter gas well at greater than 5% (v/v) methane;
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

The occurrence of any such incident shall also be recorded in the operators daily log book.

5.0 Response to Incidents

5.1 Fire Control

Council shall comply with all requirements of the POEO Act.

In the event of a fire occurring at the site Council shall take prompt action to extinguish the fire. The local Fire Brigade shall be immediately notified of all fires irrespective of the extent of the fire and whether or not it has been controlled.

In addition the OEH must immediately be notified by phone on **131 555** and in writing within 7 days of the date on which the fire occurred.

The following details must be recorded for all fire events and for each day that the fire is burning.

- The time and date when the fire started;
- Whether the fire was authorised and if not, the circumstances which ignited the fire;
- The time and date that the fire burnt out or was extinguished;

- The location of the fire (e.g. clean timber stockpile, putrescible garbage cell, etc.);
- Observations made in regard to smoke direction and dispersion;
- The amount of waste that was combusted by the fire;
- Action taken to extinguish the fire; and
- Action taken to prevent a reoccurrence.

In the event of a surface fire occurring at the site, water and/or earth shall be used as appropriate to extinguish the fire. Underground fires shall be treated on a case by case basis, but it will normally be necessary to excavate and spread the smouldering material and the smother it with earth or water.

A water tanker capable of being used for firefighting as well as dust suppression shall be provided on site at all times and maintained in a proper working order.

5.2 Trade Waste Emergency Procedures

The contingency plan establishes the procedures that Goulburn Mulwaree Council will follow in the event that an incident occurs that could affect the quality of the liquid trade waste discharged from the GWMC pump station (PS) into the sewerage system.

Leachate and stormwater running off the landfill cells are discharged to a holding pond on the low (north western) side of the landfill.

5.2.1 Accidents

Emergency procedures for the management of accidents at the pump station are as set out in GWC's OHS Management Plan.

5.2.2 Spills

Minor spills at the pump station are unlikely to pose a serious threat to the environment. However, all spills, whether major or minor, must be managed so as to minimise the potential for environmental harm. It must also be borne in mind that the GWMC is within the upper reaches of the Sydney drinking water catchment.

- **Minor Spill:** either clean up manually ensuring suitable PPE is worn (gloves, disposable overalls, eye protection, waterproof boots), or use an absorbent to soak up the spillage and the dispose to the landfill under the direction of the supervision at the GWMC.
- **Major Spills:** place earth or artificial barriers or otherwise create a depression so as to allow the spillage to pond. Pump the leakage into the adjacent leachate pond. If necessary absorb any residual and handle as above for minor spills. Do not allow spillage to flow off the site.

In the event that spillage migrates off the site, activate the environmental reporting procedures as set out in Section 8.1 of the GWMC LEMP.

In the event of prohibited materials being disposed of at the landfill site or the spillage of similar material, the frequency of monitoring of leachate quality will be increased. Depending on the nature and magnitude of the leachate pollution, the following measures could be employed:

- Increased leachate spraying to enhance the decomposition of the material using landfill processes.
- Batch testing and release of leachate to the sewerage system once testing has confirmed compliance and discharge limits.
- Removal of polluted materials by liquid waste tanker to an appropriately licensed liquid waste treatment facility.

5.3 Trade Waste Due Diligence Plan

A Trade Waste Agreement (TWA) is in place for this discharge. It is a requirement of the TWA that this Due Diligence Programme be prepared and maintained.

This due diligence programme is designed to ensure that the discharge to sewer at all times complies with the requirements of the TWA that GMC has in place the resources and systems to demonstrate this compliance and to ensure the ability to appropriately respond to any reasonably foreseeable circumstances.

5.3.1 Environmental Management

- Extreme Rainfall:
 - Extreme rainfall will lead to a heavy demand on the PS to discharge effluent. This is likely to occur when the downstream sewerage reticulation and treatment system is already at or above capacity. In these circumstances the STP Operator will require that the PS be switched off until such time as the STP Operator advises. Alternatively, the STP Operator may require that PS operation be limited to a specified number of minutes per hour until such time as normal operations can be reviewed. In this event the procedures set out in Section 2 of the Trade Waste Contingency Plan are to be implemented.

- Discharge Exceeds Approved Limits:
 - Given the nature of the effluent, it is unlikely that the discharge will exceed approved limits unless there has a major spill or deposition of unauthorised material at the landfill. In this case it should be possible to predict the impact on the effluent through regular monitoring of the leachate pond and take appropriate prevention action.
 - However, in the event that discharges exceed approved limits, switch off the PS and implement the procedures set out in Section 2 of the Trade Waste Contingency Plan to prevent further discharge occurring. This should continue on the effluent until testing demonstrates that the effluent is again within approved limits.

- Power Failure:
 - In the event of power failure implement the procedures set out in Section 6 of the Trade Waste Contingency Plan.
 - In the event of a switchboard failure (such as a fire) the pump station can be wired using temporary measures according to standard sewerage pumping station designs.

- Pump Failure:
 - Given that there is a standby pump in the well, the likelihood of total pump failure is low. However, in the event that both pumps fail implement the procedures set out in Section 6 of the Trade Waste Contingency Plan.

6.0 Contact Information

If you suspect a contact incident has occurred as a result of Council activity, please contact Council immediately on (02) 4823 4444.

6.1 Contact Details

Relevant Authorities

Relevant Authority	Phone Number
EPA – Environmental Line	131 555 (24 hours)
SafeWork NSW	131 050 (24 hours)
Goulburn Mulwaree Council (normal hours)	(02) 4823 4444
Goulburn Mulwaree Council (after hours)	(02) 4823 4500
Ministry of Health (NSW Health)	(02) 9391 9000
NSW Fire & Rescue	000
NSW Police	000
NSW Ambulance	000

Where adequate resources are available for concurrent notification and immediate response and immediate response to an environmental incident, notification to the relevant Authorities must be given immediately. The following information should be given when notifying relevant authorities:

- The time, date, nature, duration and location of the incident;
- The location of the place where the pollution is occurring or likely to occur;
- The nature, estimated quantity or volume and the concentration of any pollutants involved;
- The circumstances of which the incident occurred;
- The action(s) taken or proposed to deal with the incident and any resulting pollution or threatened pollution; and
- Any other information requested by the Authority.

7.0 Terms and Definitions

Term	Description
EPA	Environmental Protection Authority
EPL	Environmental Protection Licence
GWMC	Goulburn Waste Management Centre
Notifiable Incident	A pollution causing incident causing or threatening material harm (actual or potential harm to the safety of human beings or to the ecosystems that is not trivial, or results in actual or potential loss or property damage of an amount, exceeding \$10,000.00).
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
Pollution Incident	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 substance, as a result of which pollution has occurred, is occurring or likely to occur.
Relevant Authority	Environment Protection Authority, NSW Health (Public Health Unit), WorkCover, Goulburn Mulwaree Council, Fire Rescue NSW
STP	Sewer Treatment Plant