Procedure

Procedure Title:	**Nammoona Waste & Resource Recovery Facility Pollution Incident Response Management Plan**
Procedure Number:	14.10
Focus Area:	EH1 Managing our Waste and Water
Responsibility:	Infrastructure Services
Authorisation:	21/10/19

Purpose

This Plan provides instruction on how to respond in the event of a pollution incident at the Nammoona Waste & Resource Recovery Facility. The Plan helps meet the requirements imposed on licensed premises in Part 5.7A of the Protection of the Environment Operations Act 1997.

Scope

This Plan applies only to the licensed portion of the Nammoona Waste & Resource Recovery Facility although the principles and practices can be applied to the remainder of the site. The Plan only applies to pollution incidents regardless of whether there is risk to the environment, human safety or both.

Procedure

1. Introduction

Part 5.7A of the POEO Act requires holders of environment protection licences to prepare and implement Pollution Incident Response Management Plans (PIRMPs). As a licensed premise the facility must have a PIRMP in place that meets the requirements of Part 3A of the POEO Regulation. The site must also test the elements of the PIRMP at least annually.

The objectives of PIRMPs are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the EPA, other relevant authorities specified in the Act, and people outside the facility who may be affected, and;
- 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.

2. Emergency Contact Details

Reporting Internally

Richmond Valley Council Incident Reporting	02 6660 0300
Resource Recovery & Waste Overseer – Malcolm Massey	0436 609 412
Resource Recovery & Waste Coordinator – Carla Dzendolet	0437 035 272
Manager Infrastructure Services – David Timms	0475 959 715
Director Infrastructure & Environment – Angela Jones	0415 299 192

External Authorities

Emergency Services	000 (112 from mobiles)
Environment Protection Authority (EPA)	131 555
Public Health Unit – Lismore	02 6620 7585
Infection & Disease	0439 882 752
Environmental Health	0428 882 805
Safework NSW	131 050
Fire and Rescue NSW	1300 729 579

3. The Site and its Hazards

- A site description with map is given in Appendix 1.
- An inventory of pollutants is given in Appendix 2.
- A description of potential hazards and their likelihoods is provided in Appendix 3.

4. Pre-emptive Actions

The following pre-emptive actions are in place to minimise the risk to humans and the environment from pollution incidents:

- Fire management – extinguishers, water truck, fire warden
- Stormwater management and monitoring
- Groundwater monitoring program
- Leachate collection and monitoring
- Noise management
- Air pollution management including dust and methane
- Hazardous waste management including asbestos
- General waste surveillance and management
- Chemical storage
- Chemical spill management
- The safety equipment shown in Section 5 below

Pre-emptive actions that have been taken to minimise potential environmental harm from over-irrigation of leachate include:

- A timer on the leachate pump to automatically switch pump off
- A daily checklist that prompts an afternoon check that the pump is off
- A weekly checklist prompting equipment checks
- Training operators on how to start the leachate pump and Procedure 15:12 Leachate Irrigation (Nammoona Landfill)

5. Safety Equipment

The safety equipment in place for pollution incidents is detailed in the following table.

Equipment	Location(s)	Comments
Fire extinguishers	Gatehouse, CRC, FERRC, forklift, loader, truck shed, Animal Shelter office, tip shop	
Spill kits	Gatehouse, hook truck, fuel storage area, CRC, chemical shed	
SDS Register	Gatehouse	
Dust mask	Gatehouse	
Disposable overalls	Gatehouse	
Eye protection	Standard issue to staff/Gatehouse	
Needle-resistant gloves	Gatehouse	
Submersible flex-drive pump and motor	Green Shed #1 (work shed)	
Layflat hose 100m – for incidents	Green Shed #1 (work shed)	
Fuel (unleaded) – for pump	Garbage truck shed	
Fire hydrant	Dargaville Drive, adjacent Animal Shelter office, old entry road	
Chemical gloves	Gatehouse	

6. Communication with the Community

6.1 Neighbours and the Wider Community

In the event of an incident the methods of communication listed below can be employed with Management approval (where relevant) depending on the severity and nature of the incident.

- Phone calls
- Site visits/door knocking
- Letter box drops
- Media releases (e.g. radio/television/newspaper/internet)

The following factors should be considered when deciding what methods to employ and the extent of the communications with neighbours and the wider community:

- The size of the emission or discharge
- The type of pollutant
- What the pollutant(s) might impact (e.g. water, land)
- The size of the potentially impacted area
- Weather conditions
- Potential duration of the incident

In particular, Council will attempt to provide warning as early as possible by phone or personal visit to any premises directly affected by the incident. Warnings should include the following on a case by case basis:

- Incident details
- How community members should respond (e.g. lock windows & stay indoors, leave the neighbourhood)
- Any land or waterways where contact should be avoided

If early warning is not possible then Council will provide notification during and after an incident by advising affected persons and where relevant providing updates. In the event that a pollutant reaches a waterway Council may erect signage in prominent locations to warn users of possible contamination and to advise avoiding activities within the waterway. Once any affected area is cleaned up and deemed safe to the public Council will inform the public and staff that regular activities may resume in the area.

6.2 Key Adjoining Landholders

- DTM Timber: 02 6662 2722/UHF Radio Channel 10
- Riverina Stock Feed: 02 6662 7400
- Northern Cooperative Meat Company: 02 6662 2444
- Northern Rivers Livestock Exchange: 02 6662 6403 or 0407 788 535 or UHF Channel 15
- ARTC Train Transit Manager: 02 4902 9410

6.3 Media Relations

To comply with Council's Media Policy if a staff member is approached by a media representative the staff member should politely refer them to the Manager Communications, Events and Tourism or if urgent, the General Manager.

No staff members are to discuss Council matters with the media unless authorised to do so by the General Manager.

7. Minimising Harm to Persons on the Premises

The following are in place to assist in minimising harm to staff and visitors:

- An Emergency Plan covering evacuation procedures including Assembly Area,
- Operatives trained as Emergency Wardens,

- Operatives trained in first aid,
- Emergency exercises,
- Landline and mobile phone services for external communication, and
- A reporting protocol (see Section 8 of this Plan) allows prompt emergency response from emergency services and Council's own personnel.

8. Reporting Pollution Incidents

8.1 Immediate Reporting

In all situations the twenty-four-hour emergency number for Richmond Valley Council is 02 6660 0300. During work hours, these calls are taken by Richmond Valley Council Customer Service staff. If the call is after hours the call is redirected to an after-hours service that informs appropriate Council personnel of the incident.

If the incident poses an immediate threat to human health or safety the absolute priority is calling triple zero "000". Then proceed with the following as required:

Any environmental or pollution incidents must be reported immediately to 02 6660 0300 in line with Council Procedure 15.10 - Reporting Environmental and Pollution Incidents. Then, if a supervisor is not already aware of the incident, immediately call a supervisor or manager by making calls in the order listed under Reporting Internally (Section 2 of this Plan) until contact is made with one of the contacts. Reporting continues up the line until the level of Coordinator where a decision is made on whether to notify external authorities.

Internal incident reports are investigated and corrective actions instigated in accordance with Council procedures.

8.2 Notifying External Authorities

Notification to all external authorities is required immediately if any of the following circumstances occur as a result of a pollution incident:

(i) There is actual or potential harm to the environment that is not trivial
(ii) There is actual or potential harm to human health or safety
(iii) Clean-up costs are expected to be over $10,000

Generally, this will occur at the level of Coordinator (or someone delegated by the Coordinator), however, if personal contact cannot be made with any of the supervisors or Managers listed then a staff member aware of a pollution incident causing (i) or (ii) or (iii) must immediately call the relevant external authorities.

Notification is made by contacting all external authorities listed under External Authorities (Section 2 of this Plan). Contact must be made in the order shown in the list. If emergency services were notified as part of the immediate reporting process, they do not need to be notified again.

If, at the time of making the notification, it is believed that some of these authorities do not need to attend the incident, you may provide that advice. However, you must still provide all

the information you have regarding the incident to each authority. It is the responsibility of each authority to decide whether they need to attend the incident.

9. Responding to Pollution Incidents

9.1 Leachate Seeps or Escapes

- Where possible plug the source of leachate with soil containing a high clay content. This can be conducted using a loader or similar earthmoving equipment.
- The site's portable pump can be set up with appropriate discharge hosing to transfer escaping leachate into the leachate pond or back onto the landfill, preferably as high on the landform as possible without saturating any access roads and making sure any runoff is captured by the landfill.
- To assist in leachate transfer a small hole or channel can be dug to allow collection of the leachate for pumping.

9.2 Illegal Asbestos

- If handled inappropriately asbestos can be a major health hazard to workers and the public.
- Asbestos must be managed in line with Council's procedures 14.11 Burial of Asbestos & Asbestos Containing Materials and 14.12 Containment & Transport of Non-declared and Illegally Dumped Asbestos and Asbestos Containing Wastes.

9.3 Fire In Landfill

- If safe to do so small surface fires can be isolated from the remainder of the landfill by using earthmoving equipment to push waste or soil.
- A larger fire must be reported to Fire & Rescue NSW before consulting with the Overseer to determine if it is safe to isolate it or if it's deep, dig it out with an excavator.

9.4 Fire in Mulch

- Generally these are smoldering fires and can often be readily isolated from the rest of the mulch heap using a loader or alternative earth moving equipment.
- If safe to do so, the mulch can be spread thinly and hosed down until smoldering ceases.

9.5 Waste Oil Leaks

- Try to control the source by collecting it in a clean bucket or similar container.
- If the source of the spill is a pin-hole leak in the Waste Oil Tank a self-tapping screw can be used to plug the hole.
- Consider whether a pump-out is required to be booked for the Waste Oil Tank to allow room for any oil collected or to allow the tank to be repaired.
- Oil collected in a container (without absorbent) can be placed in the Waste Oil Tank.
- If the Waste Oil Tank is damaged, collected oil may have to be stored in a container(s) until the tank can be repaired.

- For smaller spills the spill kit absorbent can be used to soak up the oil.
- Larger spills may require the loader to apply some soil or mulch to soak up the spill.
- Absorbent materials cannot be placed in the Waste Oil Tank.
- Oil soaked soil or absorbent material needs to be disposed of in accordance with the EPA's Waste Disposal Guidelines.

9.6 Hydraulic Hose Leaks

- When a leak occurs or appears from a vehicle leave the vehicle where it is and turn it off (in the case of the loader lower the bucket before switching off).
- If the leak occurs on the landfill do not drive the equipment off the landfill until the leaking ceases.
- Then respond as per previous section for 'Waste Oil Leaks'.

10. Staff Training

Management aims to ensure Richmond Valley Council staff are competent in key functional areas, that ongoing training is provided and currency of training is monitored throughout their period of employment with Richmond Valley Council.

Records of training currency are maintained by the Councils People and Culture (P&C) section. P&C tracks expiry dates and arranges appropriate training as necessary and annual employee reviews are conducted to identify all required training needs.

Specific site related training includes:

- Chemical users & handling certificates
- DrumMuster inspection training
- Plant operation
- First Aid
- Asbestos awareness

Routine training is generally implemented verbally or by email to capture staff across the various shifts.

All staff required to implement any aspect of the Plan must be trained in that aspect(s) to ensure that the staff are aware of the content, understand their responsibilities and are competent to implement if necessary.

11. Testing The Plan

Mock emergency response training events for the premises are held at least annually and can include desktop exercises and practical exercises or drills. These events are utilised to demonstrate readiness and refine responses to specific scenarios for which Emergency Scenario Responses have been documented. De-briefing after the training event allows for further staff consultation and procedural refinement of the response.

Within one month of a pollution incident occurring an additional test of the PIRMP will be conducted to assess, in the light of that incident, whether the relevant responses are able to be implemented in an effective manner.

Details of all tests must be recorded in the following table.

Date	Aspects / Scenarios Tested	Personnel Involved
23/7/14	External contacts & internal role clarification	Latoya Cooper, Carla Dzendolet
20/7/15	Reporting, contact details, incident response	Stuart Hall, Todd Westgate, Phil George, Nathan Davis
17/12/15	Responses to incident involving over-irrigation of leachate	Trevor Fenn, Matt Schofield, Todd Westgate, Phil George
22/7/16	Contacts, hazards, safety equipment, communications and scenarios including fire, leachate escapes & exposed waste	Trevor Fenn, Todd Westgate, Jim Hammond, Alex Bate
26/7/17	All aspects with focus on safety equipment, hazard matrix, pollutant inventory & testing equipment used for a leachate escape scenario	Trevor Fenn, Phil George, Todd Westgate
13/7/18	All aspects including desktop scenarios, calling neighbours to confirm contact numbers and starting the portable pump	Trevor Fenn, Malcolm Massey, Todd Westgate
6/8/19	Fire in mulch reported by a customer and reported to the gatehouse. Contacts, procedures checked and updated.	Trevor Fenn, Malcolm Massey, Todd Westgate, Janet Purcell

Document Review and History

This Plan is to be reviewed as required and at least annually.

Version	Date	Modifications	Author	Approver
1.1	23/7/14	Update of external contacts & internal role clarification	Latoya Cooper	Carla Dzendolet
1.2	12/1/16	Contacts updated & moved to front of plan. Hazards & pollutant inventory revised. More guidance on notifying authorities & responding to a leachate escape	Todd Westgate	Carla Dzendolet
2.1	15/12/16	New format and updates to pollutant inventory, safety equipment and media liaison protocol	Todd Westgate	Carla Dzendolet
2.2	14/8/17	Inclusion of the 112 number from mobiles, extra extinguisher locations & new asbestos procedures	Todd Westgate	Carla Dzendolet

2.3	25/1/18	Updated procedures for notifying external authorities following an environmental incident	Simon Bice	Carla Dzendolet
2.4	24/7/18	Several including new location for portable pump & updating Inventory of Pollutants to include ULP	Todd Westgate	Carla Dzendolet
3.0	6/8/19	Updated reference to procedure 15:11 to replace RVC Emergency Management Plan & amended into new Governance format.	Janet Purcell / Todd Westgate	Carla Dzendolet

Definitions

EPA – Environment Protection Authority.

PIRMP - Pollution Incident Response Management Plan.

POEO Act – Protection of the Environment Operations Act 1997.

POEO Regulation - Protection of the Environment Operations (General) Regulation 2009.

Pollution - The release of an impurity or other substance that contaminates or degrades air, land or water.

Pollution Incident – An event or set of circumstances, either intentional or deliberate, where pollution occurs or is likely to occur.

References

Procedure 14.11 Burial of Asbestos & Asbestos Containing Materials

Procedure 14.12 Containment & Transport of Non-declared and Illegally Dumped Asbestos and Asbestos Containing Wastes

EPA's Waste Disposal Guidelines

Procedure 15.10 Reporting Environmental & Pollution Incidents

Procedure 5:11 Richmond Valley Council Emergency Preparedness & Emergency Management

Procedure 15:12 Leachate irrigation (Nammoona Landfill)

Review

This procedure is to be reviewed as required and at least annually.

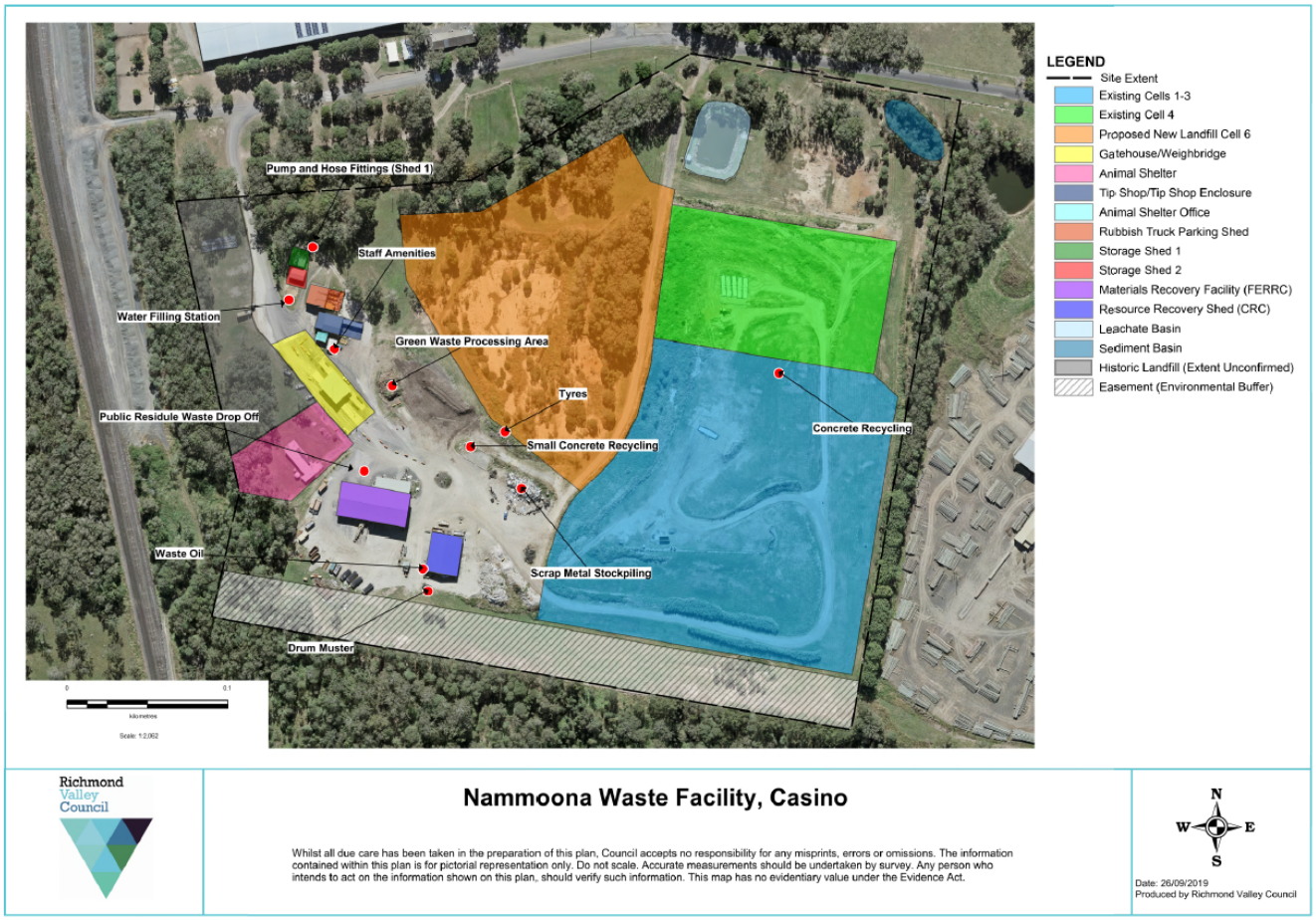
APPENDIX 1 Site Description

Site Description	Nammoona Waste & Resource Recovery Facility
Premises	Nammoona Landfill – Dargaville Drive Casino NSW 2470 (Part Lot 2 DP 1106028)
Scheduled Activity	Waste Disposal (application to land)
Environment Protection Licence	
- Licence Number	5872
- Anniversary Date	9 October
Waste Disposal (application to land)	The total tonnage of waste disposed of at the premises must not exceed 28,000 tonnes per annum.

The site is enclosed by Industrial Zoned land.

Land use in the vicinity of the landfill consists of the following:

- Cattle grazing
- Northern Rivers Livestock Exchange (NRLX)
- DTM Timbers
- Riverina Stock Feeds
- Railway Land operated by the ARTC



APPENDIX 2 Inventory of Pollutants

The following table lists the chemicals, fuels and other hazardous materials used on site in significant quantities (equal to or above 20L or 20kg).

Material	Storage Location	Typical Quantity
Engine Oil	Oil Store Shed	20L
Transformer Oil	Oil Store Shed	20 L
Hydraulic Oil	Oil Store Shed	20 L
Wynns EDT	Oil Store Shed	20 L
PG Plus Fleetguard	Oil Store Shed	20L
Agral	Chemical Store Shed	20 L
Bio Plus	Chemical Store Shed	20 L
Fly Bait	Chemical Store Shed	20 kg
Tallon	Chemical Store Shed	20 L
Diesel	Bulk Tank	5000 L
Unleaded petrol	Truck shed flameproof cupboard	40 L

The site can also contain the following solid and liquid wastes.

Waste	Storage Location	Typical Quantity
Green waste / mulch	Green waste storage area	Varies up to 300t
Scrap Steel	Scrap Steel storage area	Varies up to 500t
Cardboard	Bins at CRC & washout bay loader	5t
Waste Oil	Waste Oil Storage Facility	2t
Leachate	Leachate Pond	100t

APPENDIX 3 Description and Likelihoods of Hazards

Pollution Hazards	(Lh)	(C)	Significance	Measures To Reduce Risk
Fuel leak	L	L	L	Secure to avoid vandalism
Chemical spill	L	L	L	Secure to avoid vandalism
Offsite Leachate Discharge • Over-irrigation • Pond failure • Pond over-filling	 L L L	 M H M	 M M M	Formal procedure, checklist Water level checked regularly & trigger levels to prompt action
Surface water contamination (e.g. in rainfall)	M	M	M	Monitoring
Groundwater contamination	M	M	M	Monitoring
Fire in landfill	L	M	M	
Fire in mulch	M	L	M	Mulch is turned regularly, Minimise windrow heights
Asbestos disposed illegally	H	M	H	Vehicle checks on entry
Waste oil tank leak	L	M	M	
Gas from landfill	L	M	M	Use of daily cover
Odour from landfill	H	L	M	Use of daily cover

(Lh) = Likelihood (C) = Consequence L = Low M = Medium H = High