

Procedure



Procedure Title:	Bora Ridge Waste Facility Pollution Incident Response Management Plan
Procedure Number:	14.03
Focus Area:	EH1 Managing our Waste and Water
Responsibility:	Infrastructure Services
Authorisation:	10/08/20

Purpose

This Plan provides instruction on how to respond in the event of a pollution incident at the Bora Ridge Waste 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 procedure applies to the Bora Ridge Waste Facility including the landfill and transfer station. The procedure 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

Assisted by a LEMP the following pre-emptive actions are in place to minimise the risk to humans and the environment from pollution incidents:

- Surveillance (both general and of vehicles entering the site) to detect and manage illegal and hazardous wastes (e.g. asbestos),
- Fire Management protocols,
- Air pollution management,
- Noise management,
- Diesel tank maintained with double-skin,
- Diesel tank bunding maintained,
- Monitoring for leachate appearance and sampling where appropriate,
- Stormwater management and monitoring,
- A groundwater monitoring program,
- Safety equipment is provided as shown in Section 5 below.

5. Safety Equipment

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

Equipment	Location(s)	Comments
Fire extinguishers	Gatehouse, loader shed	
Spill kit	Loader Shed	Kit contains absorbent material
First aid kits	Gatehouse	
SDS Register	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 Landholder

Bogal Local Aboriginal Land Council – Coraki 02 6683 2510

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 situation’s pollution incidents must be lodged in the Vault app. Once the pollution incident has been lodged the next appropriate step is to contact the twenty-four-hour emergency number for Richmond Valley Council 02 6660 0300. During work hours, these calls are answered 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.
- An RVC 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 procedure 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.

9.5 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, and
- Electrical safety

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 and roles	Latoya Cooper, Carla Dzendolet
21/7/15	Contacts and roles, hazards, pollutant inventory, safety equipment, evacuation protocols, media liaison	Stuart Hall, Nathan Davis, Todd Westgate, Cameron Uebergang
30/6/16	Contacts and roles, hazards, pollutant inventory, safety equipment, evacuation protocols, all pollution responses	Ian Brown, Trevor Fenn, Todd Westgate

20/6/17	Contacts and roles, hazards, pollutant inventory, safety equipment, evacuation protocols, all pollution responses	Ian Brown, Trevor Fenn, Todd Westgate, Cameron Uebergang
12/7/18	All aspects including desktop testing of all specific response procedures.	Ian Brown, Trevor Fenn, Cameron Uebergang
23/7/19	Contacts & roles, pollutant inventory. Tested a significant leachate breakout from earthworks on the landform during capping.	Trevor Fenn, Todd Westgate & Janet Purcell
17/07/20	Contacts and roles, Pollutant inventory, safety equipment.	Joshua Moroney, Malcolm Massey, Dalvene Hall

Document Review and History

Version	Date	Modifications	Author	Approver
1.1	23/7/14	Update of external contacts & internal role clarification	Latoya Cooper	Carla Dzenolet
2.1	25/3/16	New format and major revisions to contact details and hazards	Todd Westgate	Carla Dzenolet
2.2	8/8/16	Amended pre-emptive actions, safety equipment and responses to oil/hydraulic hose leaks	Todd Westgate	Carla Dzenolet
2.3	28/7/17	Added 112 emergency no. Updated pre-emptive actions, safety equip. and hazards table. Confined spaces deleted from training	Todd Westgate	Carla Dzenolet
2.4	26/7/18	Better referencing of asbestos procedures, changed scrap metal pile to a skip, added risk measures for the waste oil tank in Appendix 3	Todd Westgate	Carla Dzenolet
3.0	23/10/19	Documented PIRMP test details. Confirmed emergency contact numbers. Updated references. Updated to new Governance format.	Janet Purcell / Todd Westgate	Carla Dzenolet
3.2	10/08/20	Vault added as initial response to an incident. Updated pollutant inventory and safety equipment. Updated site map and hazards.	Joshua Moroney	Carla Dzenolet

Definitions

EPA – Environment Protection Authority.

Landform – The mass of waste and fill comprising the landfill.

LEMP – Landfill Environmental Management Plan.

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 accidental or deliberate, where pollution occurs or is likely to occur.

References

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

Review

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

APPENDIX 1 Site Description

Site Description	Bora Ridge Waste Facility
Premises	Coraki Landfill - Myall Creek Road Bora Ridge NSW 2471 (Lot 354 DP 728161)
Scheduled Activity	Waste Disposal (application to land)
Environment Protection Licence Number	13104
Anniversary Date	9 October

Waste Disposal (application to land)

The total tonnage of waste disposed of at the premises must not exceed 5000 tonnes per annum.

The site is enclosed by Rural Zoned land.

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

- Cattle grazing & agriculture
- Bogal Local aboriginal Land Council – Coraki



APPENDIX 2 Inventory of Pollutants

The following table lists the chemicals, fuels and other hazardous products used on site in significant quantities (equal to or above 5L or 5kg):

Material	Storage Location	Typical Quantity
Diesel	Loader Shed	50L

The site can also contain the following solid and liquid wastes with pollution potential:

Waste	Storage Location	Typical Quantity
Waste oil	Waste Oil Tank	2000L
Leachate	n/a	varies

APPENDIX 3 Description and Likelihoods of Hazards

Pollution Hazards	(Lh)	(C)	Significance	Measures To Reduce Risk
Hydraulic hose leak	L	L	L	Vehicle maintenance
Leachate seep from landfill	L	M	L	Landfill has been capped
Fire on landfill	L	L	L	Keep grass length to a minimum
Asbestos disposed illegally	L	M	L	Myall Creek Road is fully fenced.
Waste oil tank leak	L	M	L	Self bunded, regular checks
Diesel tank leak	L	L	L	Tank is double skinned, bunded & undercover. Level in 2nd skin is checked

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