# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



Manager Garry Cullen	Signture	
	Date	
	Date	

#### INTRODUCTION

Garry Cullen Sand & Soil Pty Ltd as holders of environment protection licence no13175 must comply with the requirements introduced in 2012 by the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) to prepare and implement a pollution incident response management plan.

Based on the EPA guidelines the plan must set out specific requirements regarding preparing, keeping, testing and implementation of these plans.

The POELA Act introduced several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act includes a 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, SafeWork NSW, and Fire and Rescue NSW) 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.

#### Legislative requirements

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this provision requires the following:

Council as holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).

The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).

As Licensees Council must keep the plan at the premises to which the environment protection licence relates and where the relevant activity takes place (section 153D, POEO Act).

Council must test the plan in accordance with the POEO(G) Regulation (clause 98E).

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

The plan must include the following requirements

- 1. Description and likelihood of hazards
- 2. Pre-emptive actions to be taken
- 3. Inventory of pollutants
- 4. Safety Equipment
- Contact details
- 6. Communications with adjoining properties and the community
- 7. Minimising harm to persons on the premise
- 8. Maps
- 9. Actions to be taken during or immediately after pollution incident
- 10. Staff training

# The Site Activity and Surrounds

Premises Details
BENEREMBAH QUARRY AND LANDFILL

Lot 1 DP1086916 at Benerembah (Barber Road) Benerembah 2680 Scheduled Activity Waste Disposal (application to land)

Environment Protection Licence (EPL)

Licence Number: 13101

Anniversary Date: 17 September

The Licence includes Lot 106 DP 751059

Quarry and Waste disposal (application to land)

The quarry is located at the southern side of the site and comprises a 230 metre active quarrying face, stockpiles of extracted materials, extraction and loading machinery, and a mobile sand screening unit

The landfill currently comprises one completed landfill cell and one active landfill cell, an existing concrete stockpile, perimeter screening bunds, and established all weather internal roads. The landfill site is only accessible from Barber Road via locked gates.

The site is enclosed by RU1 Primary Production zoned land.

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

- Road reserve
- Cropping of surrounding lands

#### **Contact details**

Garry Cullen Site Manager phone 0429440157 (after hours contact) Shane Cullen Site Manager phone 0428440157 Email gary.02@bigpond.com

# <u>Persons Responsible pollution incident, managing response to</u> pollution incident and notifying authorities

Garry Cullen Site Manager phone 0429440157 (after hours contact) Shane Cullen Site Manager phone 0428440157 (alternative contact) Email gary.02@bigpond.com

# 1 Description and Likelihood of Hazards

Activities carried out on the site involve the potential for some environmental and physical exposure to:

The likely hood of a fire is low due to no flammable materials kept on site The likely hood of a tip face fire is very low due to any waste being covered as soon as practical    Leachate Collection 1. Overflow of leachate pond 2. Failure of containment system	Site Hazards	Likelihood of Occurring	Mitigating Measures
materials kept on site The likely hood of a tip face fire is very low due to any waste being covered as soon as practical  Leachate Collection 1. Overflow of leachate pond 2. Failure of containment system  1. Low The likely hood of leachate over flow is very small as pond is located at lowest point and has sufficient capacity for a 1 in 20 year storm event  Rain Events and Surface Water Runoff 1. Stormwater diversion 1. Low Stormwater diverted around and away from contaminated areas  Fuel or Oil spill 1. Lubricant or fuel spill 1. Low The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater Contamination 1. Low There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from	<u>Fire</u>	1. Low	,
The likely hood of a tip face fire is very low due to any waste being covered as soon as practical  Leachate Collection 1. Overflow of leachate pond 2. Failure of containment system  1. Low The likely hood of leachate over flow is very small as pond is located at lowest point and has sufficient capacity for a 1 in 20 year storm event  Rain Events and Surface Water Runoff 1. Stormwater diversion  1. Low Stormwater diverted around and away from contaminated areas  Fuel or Oil spill 1. Lubricant or fuel spill 1. Low The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater Contamination 1. Contamination of groundwater There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from			
Leachate Collection 1.   Coverflow of leachate pond			-
any waste being covered as soon as practical			
as soon as practical			
Leachate Collection 1.			
The likely hood of leachate pond			as soon as practical
Pond   Pond		4 1	The Block has def
2. Failure of containment system  2. Low  Small as pond is located at lowest point and has sufficient capacity for a 1 in 20 year storm event  Rain Events and Surface Water Runoff  1. Stormwater diversion  1. Low  Stormwater diverted around and away from contaminated areas  Fuel or Oil spill  1. Lubricant or fuel spill  1. Low  The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater  Contamination  1. Contamination of groundwater  Contamination of groundwater  Ontamination of groundwater  Contamination of groundwater  Ontamination of groundwater  Ontamination of groundwater extraction this is the floor of the land fill and stops any contaminates from		1. LOW	·
System    Contamination   Contamination	·	0.1	
Rain Events and Surface Water Runoff  1. Stormwater diversion  1. Low Stormwater diverted around and away from contaminated areas  Fuel or Oil spill 1. Lubricant or fuel spill 1. Low The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater Contamination 1. Contamination of groundwater 1. Low The risk of a spill is very low due to all lubricant and fuel is contained in machinery is checked for leaks daily before commencing work for the day  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from		2. LOW	·
In 20 year storm event	System		· .
Rain Events and Surface       Water Runoff         1. Stormwater diversion       1. Low         Fuel or Oil spill       1. Low         1. Lubricant or fuel spill       1. Low         The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day         Groundwater       There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from			
Stormwater diversion   1. Low   Stormwater diverted around and away from contaminated areas	Pain Events and Surface		iii 20 year storiii event
1. Stormwater diversion  1. Low  Stormwater diverted around and away from contaminated areas  Fuel or Oil spill  1. Lubricant or fuel spill  1. Low  The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater  Contamination  1. Contamination of groundwater  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from	-		
The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day    Groundwater   Contamination   1. Low   The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day   There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from		1 Low	Stormwater diverted
Fuel or Oil spill  1. Lubricant or fuel spill  1. Low  The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater  Contamination  1. Contamination of groundwater  groundwater  1. Low  The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from	1. Glottiwater diversion	1. Low	
1. Lubricant or fuel spill  1. Low  The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater  Contamination  1. Contamination of groundwater  1. Low  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from			
1. Lubricant or fuel spill  1. Low  The risk of a spill is very low due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater  Contamination  1. Contamination of groundwater  1. Low  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from			
Iow due to all lubricant and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day    Groundwater   Contamination   There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from	Fuel or Oil spill		
and fuel is contained in machinery and machinery is checked for leaks daily before commencing work for the day  Groundwater Contamination 1. Contamination of groundwater  1. Low 1. Low 2. There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from	1. Lubricant or fuel spill	1. Low	
Contamination   1. Low   Delow the sand after extraction this is the floor of the land fill and stops any contaminates from			
is checked for leaks daily before commencing work for the day  Groundwater Contamination 1. Contamination of groundwater  1. Low 1. Low 2. Selected for leaks daily before commencing work for the day  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from			
Groundwater Contamination 1. Contamination of groundwater  groundwater  1. Low  1. Low  1. Low  2. Defore commencing work for the day  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from			- 1
Groundwater Contamination 1. Contamination of groundwater  There is a natural clay pan below the sand after extraction this is the floor of the land fill and stops any contaminates from			- 1
Groundwater Contamination 1. Contamination of groundwater  1. Low below the sand after extraction this is the floor of the land fill and stops any contaminates from			J
Contamination  1. Contamination of groundwater  1. Low  1. Low  1. Low  2. Extraction this is the floor of the land fill and stops any contaminates from			for the day
Contamination  1. Contamination of groundwater  1. Low  1. Low  1. Low  2. Extraction this is the floor of the land fill and stops any contaminates from	Graundwater		
1. Contamination of groundwater  1. Low below the sand after extraction this is the floor of the land fill and stops any contaminates from			There is a natural clay non
groundwater extraction this is the floor of the land fill and stops any contaminates from		1 Low	• •
of the land fill and stops any contaminates from		1. 2000	
any contaminates from	g. canamator		
			-
, ontoining the allowing that is			entering the ground water

<u>-</u>		
<u>Dust</u>	1. med	Dust will be controlled by
1. Dust produced from		keeping equipment
plant and equipment		speeds low and if
		excessive dust is
		produced roads and work
		area will be wet down to
		minimise dust

#### 2. Minimizing Risk of Harm to Human Health or Environment

The following will be followed

- No Smoking on site
- Naked Flames or Heat Generating Activities e.g. (repairs involving cutting with a gas torch or welding) must be done in clear are free from Any combustible materials and have a fire extinguisher available DAYS WITH TOTAL FIRE BAN NO HEAT GENERATING ACTIVITES ALLOWED
- · All visitors must contact site manager to before entering site
- All visitors to be accompanied by staff member and will be instructed on site safety including emergency evacuation point (Barber Road entrance)
- Gate on Barber road to be kept closed outside operating hours of site
- All waste to be covered as soon as practical
- No waste other than concrete waste to be processed into aggregate is to be stockpiled

# 3. Pre-emptive Actions to be Taken

Safety equipment and personal protection equipment for management of pollution incidents includes:

Stored in trucks as there is no site office

- Fire extinguishers 1 kg and 2.5 kg dry powder type fitted to machines and trucks as we have no site office tested every 3 years due Dec 2020
- Water truck available to supress dust also has a fire fighting pump and hoses attached if required to fight a fire
- Disposable overalls
- Dust Mask
- Eye protection
- Rigger gloves

## 4. Inventory of Pollutants

There are no pollutants kept on site

The plant used on-site are owned and operated by a Garry Cullen Sand & Soil Pty Ltd. Lubricants and fuels used in the plant are contained to plant and equipment and is serviced off site oils and fuel is only on site for daily checks and is carried in the trucks used to transport waste and quarry material

The current EPL attached does not identify pollutants to be monitored, limit conditions or trigger levels.

## 5. Safety Equipment

Staff are issued with personal protective equipment (PPE) to ensure that they can undertake duties in a safe manner and protect themselves and others.

#### Examples of PPE include:

- High visibility clothing
- Safety boots
- Broad-brimmed hats
- Safety gloves
- Sunscreen
- Safety glasses
- Dust masks

A spill containment kit is kept in cat loader as there is no site office and easily accessible.

# **6 Incident Contact Details**

#### **External Contacts**

Emergency Servi	ces		
Emergency Hotlin	ne Number (24 hours)		000
Griffith Rural Fire	Service		02 6966 7800
Environment Prof	ection Authority	Griffith Regional Office	02 6969 0700
(EPA)		Emergency Hotline Number (24 hour)	131 555
Public Health Uni	t	Albury Regional Office	02 6080 8900
The Ministry of H	ealth (via Public Health Units)		

SafeWork NSW 13 10 50

Carrathool Shire Council Emergency Hotline Number (24 hour) 0407244429

# 7. Communications with Adjoining Properties and the Community

In the event of an incident occurring, the following methods of communication shall be employed depending on the severity and nature of the incident.

All notifications will be via mobile phone or in the case of Peter Salvestro he can also be contacted via uhf ch 20

Communications to adjoining landowner/occupiers (refer to list below). Strategic phone calls to occupiers including:

ADJOINING LANDHOLDERS (Within identified buffer)	CONTACT NUMBER
Peter Salvestro	69634220

The extent of the communications with the neighbours and the community will depend on the:

- The magnitude of the emission or discharge
- Type of pollutant
- What that pollutant may impact water, land, air
- The potentially impacted area
- Weather conditions
- Potential duration of the impact

It will also depend on the severity and extent of the incident as determined by the Lead Emergency Agency in control of the event.

Other communications with the community may be via local newspapers, radio and television, the Kyogle Council website and/or door knock. Once again, this will depend on the severity and extent of the incident.

#### 8. Minimising Harm to Persons on the Premises

#### Site manager responsibilities

Responsibilities include:

- Immediately responding to any emergency situation
- Ascertaining the nature of the emergency and determining appropriate actions
- Ensuring the appropriate emergency services have been notified
- Co-ordinating the deployment of staff and any internal specialist resources
- Where safe to do so take steps to contain or control the hazard
- Ensuring that appropriate senior management are kept updated on the situation
- Co-ordinating post-incident recovery strategies
- Maintenance of staff training, emergency information lists and emergency related plant and equipment necessary for emergency evacuation compliance

#### **Emergency Management Methods**

Emergency management actions at the site are to be carried out in accordance with this plan.

#### **Emergency Resources**

#### **Emergency Warning and Communications System**

The landfill has mobile telephone coverage. In the event of a failure of the mobile coverage, messages may be relayed via runner.

All equipment also fitted with uhf radios and are capable of contacting the neighbouring farms

#### **Fire-fighting Equipment**

Garry Cullen Sand & Soil Pty Ltd facilities are equipped with fire extinguishers, which are strategically located in the loaders and trucks onsite as there is no site office. There is also a water cart available with a fire fighting pump and hoses attached

All employees shall be trained in the use of the equipment. This training shall be both by verbal instruction and practical demonstration.

All fire-fighting equipment shall be regularly checked and serviced. Every 3 years

#### First Aid Equipment Locations

First Aid Kits are located in the loaders and trucks on site as there is no site office.

#### Emergency Response and Evacuation Plan

#### Discovering a dangerous situation

- Move persons away from danger if safe to do so
- Contact relevant emergency services (ie ambulance/fire/police)
- Announce evacuation if dangerous situation requires (runner)

#### Reporting an emergency

When reporting an emergency, the following information should be included:

- Name of organisation
- Exact nature of emergency (any casualties?)
- Exact location (including address, near cross street, building name, postcode)
- Name of person reporting emergency
- Contact number (where applicable)
- Reporting is to be done by the Waste Officer, Waste and Regulatory Officer or other appropriate person

#### **Evacuation Alert**

Verbal instructions by calling "emergency emergency emergency" to evacuate over the telephone or verbal directive issued by the site manager

#### Assembly areas

In the event of an evacuation, persons should assemble at the nearest safe assembly area as stated on site specific plans.

#### First Aid

Any injured people who can be moved safely should be taken to the nearest assembly area (whichever is more appropriate) for treatment. Those people who are trapped or unable to be removed immediately must be protected and given first aid on the spot (providing it is safe to do so).

#### Media Liaison

Should any staff member be approached by media representatives for comment, the staff member must refer them to the Site Manager, or the person authorised to speak on their behalf.

#### <u>9. Maps</u>

Map and aerial photograph of Landfill Facility and



10. Actions to be taken during or immediately after pollution incident

# **During a pollution incident**

 All actions taken during and after a pollution incident will vary depending on the nature of the properties of the pollutant/s and severity of the incident

- Any action taken shall be in accordance with any Work Health and Safety requirements
- Detailed records/evidence collection shall be carried out provided it is safe to do so and with approval of the person in control of the site. Evidence may include photographs/ samples taken and written notes
- Follow all directives given by the person/s in charge

#### Actions while waiting for emergency services to arrive

- Staff will attempt to clear any nearby combustible materials at risk of catching fire by hand using shovels and rakes or with equipment (loaders and excavators) if safe to do so
- Water truck with will be used to attempt to extinguish fire if safe to do so. In the
  event of a fire staff will use equipment (loaders and excavators) to attempt to
  smother fire if safe to do so
- In the event of a fire staff will use equipment loaders and excavators to attempt to smother fire if safe to do so
- When emergency services to arrive staff will follow all directions given by emergency services personal

#### **Emergency Termination**

Only the Chief Emergency Controller shall deem the emergency terminated. This action shall take place once all emergency services have concluded their involvement.

Only the Chief Emergency Controller shall deem the site safe to enter.

#### **Post Incident Reporting**

Reporting of the incident to the EPA shall include the following information

- The time, date, nature, duration and location of the incident
- The location of the place where the pollution has occurred 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

#### 11. Staff Training

.

Specific site related training includes:

- Plant Operation
- Electrical safety

All new staff members carry out health and safety induction training and are trained in Garry Cullen Sand & Soil Pty Ltd general and site-specific Safe Work Method Statements.

Mock emergency response training events are held. These events are utilised to demonstrate readiness and refine responses to a specific scenario for which an Emergency Scenario Response has been documented. De-briefing after the training event allows for further staff consultation and procedural refinement of the response.

#### 12. Testing of Plan

Plans are required to be tested routinely. Below is a summary of tests carried out.

Date	Method of Testing and Scenario	Problems Identified	Improvements
16/03/2020 M.Sidlow	Desktop simulation relating to a chemical spill landfill site.  Multiple external and internal organisations/persons were contacted, as well as landholder. The primary purpose was to confirm correct contact details and effective communication.  Correct contact details were confirmed for the following: -  Griffith rural fire service- Rachel  Epa Griffith office- linda  EPA hotline- Cathy  Public Health Unit Albury-Mellisa  Carrathool Shire Council 24 hour line – Mark  Peter Salvestro- Melanie	No identified problems.	Fixed incorrect epl licence number and anniversary date