



Bungendore Resource Recovery Facility – Pollution Incident Response Management Plan

Revision History

Revision	Revision Comments	Author	Approver	Approval Date
0	Original	Brendan Belcher	Gordon Cunningham	14/08/2019
1	See update table	Brendan Belcher	Gordon Cunningham	07/02/2022
2	See update table	Brendan Belcher	Gordon Cunningham	09/10/2023
3	No amendment – uprev to match ECM version control			
4	No amendment – uprev to match ECM version control			
5	No amendment – uprev to match ECM version control			
6	See update table	Brendan Belcher	Gordon Cunningham	09/10/2024

Purpose

Queanbeyan-Palerang Regional Council (QPRC) holds an Environment Protection Licence with the NSW Environment Protection Authority for the Bungendore Resource Recovery Facility. As per the *Protection of the Environment Operations Act (1997)* (the "POEO Act"), the holder of an environment protection licence must prepare, keep, test and implement a pollution incident response management plan that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at the Bungendore Resource Recovery Facility, or where the activity takes place in the case of mobile plant licences, and be made available on request by an authorised NSW Environment Protection Officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publically available website, or if there is no such website, by providing a copy of the plan to any person who make a written request. The section of the plan which are required to be publically available are set out in clause 98D of the *Protection of the Environment Operations (General) Regulation 2009*.

Note: This plan must be developed in accordance with:

- NSW EPA's *Environmental Guidelines: Pollution Incident Response Management Plans*; and
- The *Protection of the Environment Operations Act 1997*; and
- The *Protection of the Environment Operations (General) Regulation 2009*

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Environment Protection Licence Details		Pollution Incident – Person(s) responsible	
Name of Licensee	Queanbeyan-Palerang Regional Council	Plan Activation	<u>Primary</u> Site staff
EPL Number	21023	Notifying Relevant Authorities	<u>Primary</u> Acting Coordinator – Waste Operations <u>Secondary</u> Manager Utilities
Premises name and address	Bungendore Resource Recovery Facility 210 Tarago Road Bungendore NSW 2621	Managing Response to Pollution Incident	<u>Primary</u> Acting Coordinator – Waste Operations <u>Secondary</u> Manager Utilities
Company contact details	Manager Utilities		
Scheduled Activity	Composting Waste Storage		
Fee based activity	Composting Waste storage – other types of waste Waste storage – waste tyres		

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Incident Notification		
<u>Notification of relevant authorities</u> The following must be notified of any incident that causes or threatens to cause material harm to the environment. If notification is made, notification must be made to ALL listed authorities.	Emergency Services	000
	EPA Environment Line	131 555
	NSW Health	02 9391 9000
	Safework NSW	131 050
	Council WHS/HSEQ Officer	
Local Authority	Council Manager Environment and Compliance	
	Queanbeyan-Palerang Regional Council	1300 735 025
Local community and neighbours notification and communication procedures	<u>Immediate Neighbours</u> Door knock of impacted properties Follow up correspondence <u>General Community Alert</u> Council Facebook Notification via Council Communications Team	

Description and Likelihood of Hazards	
<u>Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates</u>	See attached risk assessment
<u>Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood</u>	See attached risk assessment

Pre-emptive actions to be taken	
<u>Provide detailed descriptions of the actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises</u>	<ul style="list-style-type: none"> • No smoking on site • Screening of incoming loads • Appropriate separation and storage of materials • Pro-active management of waste volumes to minimise risk of environmental incident • All leachate diverted to leachate ponds

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Inventory of Pollutants

Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates
 Identify the maximum quantity of any pollutant/s that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates

Pollutant	Max Quantity	Location	Comments
Waste oil	8000L	Eastern hardstand	Large metal bund for oil collection delivered by residents
Tyres	Approximately 500 at any time	Eastern hardstand	
Residual Waste	Approximately 100t at any time	Waste push-pit	
Paints – Water based Paints – Oil based Non-motor Oil	9000kg	CRC Building	CRC
Household Batteries	150kg	CRC Building	CRC
Aerosols	250L	CRC Building	CRC
Corrosive Acid	250L	CRC Building	CRC
Corrosive Alkaline	250L	CRC Building	CRC
Flammable Liquid	250L	CRC Building	CRC
Oxidising Agent	250L	CRC Building	CRC
Toxic Materials	250L	CRC Building	CRC

Safety Equipment

Describe the safety equipment or other devices that are used to minimise the risk to human health or the environment and to contain or control a pollution incident

The following safety equipment is located on site:

- 2 x spill kits – CRC Shed
- 2 x fire hose reels – Waste Pushpit
- 8 x fire extinguishers – Various locations
- 2 x safety showers – CRC Shed/Waste Pushpit
- 2 x first aid kits – Lunchroom/Gatehouse
- 6 x barrier boards – Machinery Shed

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Communicating with neighbours and the local community

Identify details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on

- In the event of emergency requiring notification to adjoining owners, the Program Coordinator will make contact via phone or door-knocking

Develop any specific information that could be provided to the community so it can minimise the risk harm

- Given the low number of affected properties, no information is considered necessary
- In higher risk events (e.g. waste/tyre fire), emergency services will be in control of public messages and Council will publish their messages

Minimising harm to persons on the premises

Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on

- See attached risk assessment

Develop any specific information that could be provided to the community so it can minimise the risk harm

- Given the low number of affected properties, no information is considered necessary
- In higher risk events (e.g. waste/tyre fire), emergency services will be in control of public messages and Council will publish their messages

Maps

Provide a detailed map showing

- Location of the premises
- Surrounding area that is likely to be affected by a pollution incident
- Location of potential pollutants on the premises
- Location of any stormwater drains on the premises

It is also recommended that the position of any discharge points or any other useful information be included on the maps, and that any important details on the map are labelled

See attachment

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Actions to be taken during or immediately after a pollution incident	
Pollution control action	<p>In the event of pollution incident, the following will occur:</p> <ul style="list-style-type: none"> Site staff identify the incident and enact this PIRMP Site staff make area safe and evacuate area as necessary Site staff make contact with Program Coordinator or Service Manager Program Coordinator/Service Manager determine if incident needs to be notified to relevant authorities Program Coordinator/Service Manager notify adjoining properties as necessary Program Coordinator/Service Manager notify communications section as necessary Site staff and Program Coordinator undertake corrective actions as necessary <p>See also "PIRMP on a Page" (attached)</p>
Coordinating persons	<p><u>Primary</u> Acting Coordinator – Waste Operations</p> <p><u>Secondary</u> Manager Utilities</p>

Staff Training
<p>Identify the nature and objectives of the any staff training program in relation to this plan</p>
<ul style="list-style-type: none"> Asbestos Awareness Corporate HSEQ First Aid Forklift ticket CRC Management (including spill response) Landfill and Transfer Station Operator Workshop

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Testing and Updating the PIRMP

It is a legal requirement to test the plan every 12 months and within 1 month of any pollution incident:

- Detail the manner in which the plan is to be tested and maintained to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner
- Detail how the testing is documented and recorded (this must include the testing dates and the names of all staff members who carried out the testing)
- Detail the dates on which the plan is updated

PIRMP Testing Details

<u>Date Tested</u>	<u>Tested By</u> (to include the names of all people involved in testing)	<u>Details of Test</u> (e.g. nature of the test, involvement of other agencies) Note: testing must cover all components of the plan.	<u>Finding of test including issues identified</u>	<u>Next scheduled testing date</u> (must be within 12 months from the current test)
16 March 2020	Brendan Belcher Shane O'Shea Andrew McLeod	See ECM Reference 625351	See ECM Reference 625351	
7 February 2022	Brendan Belcher Shane O'Shea Gordon Raynes Chris McMullan	See ECM Reference 1536961	See ECM Reference 1536961	Before 7 February 2023
27 September 2023	See ECM Reference 2807637	See ECM Reference 2807637	See ECM Reference 2807637	Before 27 September 2024

PIRMP Update Details

<u>Date Occurred</u>	<u>Reason for update</u>	<u>Details of Update</u>	<u>Date the updated version uploaded to website (if applicable)</u>	<u>Date of completion</u>
7 February 2022	PIRMP test details added	PIRMP test details added	8 February 2022	7 February 2022
9 October 2023	General PIRMP review	General update of contacts	10 October 2023	9 October 2023
9 October 2024	General PIRMP review	General update of contacts and PIRMP test details added	10 October 2024	9 October 2024

Attachments

Attachment 1 - Risk assessment

Attachment 2 – Site Map

Attachment 3 – PIRMP on a Page – not included in public document

Risk register C17198187
 Business unit/activity/project name:
 Prepared by: Brendan Belcher
 Date: Aug-19
 Approved by: Gordon Cunningham
 Date:
 Next reviewed scheduled for:

Aug-19

Aug-20

IDENTIFY			ASSESS			CONTROL											
Risk ID/number	Description	Sources of environmental impacts/ aspects	Inherent risk assessment			Preventative actions			Detection and response actions						Residual risk assessment		
			Likelihood	Consequences	Rating	Controls acting on sources of risk	Type	Effectiveness	Responsible	Controls acting on consequences	Type	Effectiveness	Responsible	Likelihood	Consequence	Rating	
E1	Asbestos containing material (ACM) is dumped on site	a) Exposure of worker and general public to ACM b) Release of ACM to environment	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Almost certain	Medium	High	a) Inspection of incoming waste b) Reject loads with suspect material unless clearance certificate provide	Process/system	Mostly effective	Site staff	i) Implement asbestos management plan if suspected ACM found	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E2	Chemical spill	a) Release of chemicals to the environment b) Exposure of workers and general public to chemicals c) Interaction of chemicals results in fire/explosion or other hazardous event	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Likely	Medium	High	a) Store chemicals in well ventilated undercover area b) Utilise double banded storage receptacles c) Practice safe handling and storage	Process/system	Very effective	Site staff	i) Implement spill clean-up procedure	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E3	Waste fire	a) Release of toxic chemicals to environment b) Exposure of public to toxic chemicals c) Fire spreads beyond site boundaries	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Possible	Very high	High	a) Manage waste volumes b) No smoking on site c) Divert hot loads to alternative area	Process/system	Very effective	Site staff	i) Call 000 ii) Close site iii) Implement PIRMP	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E4	Tyre fire	a) Release of toxic chemicals to environment b) Exposure of public to toxic chemicals c) Fire spreads beyond site boundaries	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Possible	Very high	High	a) Manage waste volumes and store correctly b) No smoking on site	Process/system	Very effective	Site staff	i) Call 000 ii) Close site iii) Implement PIRMP	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E5	Build up of waste above licence limits	a) Excessive stockpiled material risks environmental damage b) Excessive stockpiled material leads to licence breach	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Likely	Medium	High	a) Regularly review stockpile quantities b) Have regular collections of materials	Process/system	Very effective	Site staff	i) Arrange collection at earliest opportunity	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E6	Bushfire	a) Release of toxic chemicals to environment b) Exposure of public to toxic chemicals c) Fire melts receptacles and chemicals are released	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Possible	Medium	Medium	a) Manage site volumes b) Use fire-resistant materials c) Store flammable materials away from potential fire paths d) Have on-site fire management systems	Process/system	Reasonably effective	Site staff	i) Close site ii) Call 000 iii) Implement Emergency Management Plan	Process/system	Very effective	Site staff	Unlikely	Low	Low
E7	Water contamination	a) Release of toxic chemicals to environment b) Exposure of public to toxic chemicals c) Fire spreads beyond site boundaries	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Unlikely	Medium	Medium	a) Manage site dam volumes b) Avoid unnecessary site washdown c) Maintain erosion and sediment controls	Process/system	Very effective	Site staff	i) Implement spill clean-up procedure	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E8	Vehicular accident on site	a) Release of toxic chemicals to environment b) Exposure of public to toxic chemicals c) Fire spreads beyond site boundaries	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Possible	Very high	High	a) Manage waste volumes and store correctly b) No smoking on site	Process/system	Very effective	Site staff	i) Call 000 ii) Close site iii) Implement PIRMP	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E9	Waste Explosion	a) Release of toxic chemicals to environment b) Exposure of public to toxic chemicals c) Fire spreads beyond site boundaries	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Possible	Very high	High	a) Manage waste volumes and store correctly b) No smoking on site	Process/system	Very effective	Site staff	i) Call 000 ii) Close site iii) Implement PIRMP	Process/system	Very effective	Site staff	Unlikely	Very low	Low
E10	Wind-blown litter	a) Release of litter to the environment	i) Site is shut down ii) Licence breach iii) Additional cost iv) Reputational damage	Almost certain	High	Extreme	a) Manage site wastes to minimise litter	Process/system	Reasonably effective	Site staff	a) Litter pick as necessary b) Engage contractors to assist when necessary	Process/system	Mostly effective	Site staff	Likely	Low	Medium

