POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

BROKEN HILL
CITY COUNCIL

AUSTRALIA'S FIRST
HERITAGE LISTED CITY

QUALITY CONTROL			
EDRMS REFERENCE	11/200	**FILE REFERENCE**	D20/42791
RESPONSIBLE POSITION	Waste and Sustainability Manager		
APPROVED BY	General Manager		
REVIEW DATE	1 October 2021		
EFFECTIVE DATE	**ACTION**	**ENDORSED BY**	
1 October 2021	Approved	General Manager	
NOTES	Front Cover Image: Broken Hill Waste Management Facility. Images sourced from Council's Image Library © Copyright Broken Hill City Council 2020		
ASSOCIATED DOCUMENTS	Landfill Environment Management Plan		

TABLE OF CONTENTS

1. PURPOSE

The Broken Hill City Council holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the Broken Hill Waste Management 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 (PIRMP) 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 out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the Broken Hill Waste Management Facility and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan are also available on the Broken Hill City Council website. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

This plan was developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009 and reflects the EPA's *Guideline: Pollution incident response management plans, Update 2019*.

2. ENVIRONMENT PROTECTION LICENCE (EPL) DETAILS

Name of licensee: (including ABN)	Broken Hill City Council ABN 84873116132
EPL number:	5898
Premises name and address:	Broken Hill Waste Management Facility 1 Wills Street, BROKEN HILL NSW 2880
Company or business contact details:	**Position or title:** Waste and Sustainability Manager **Business hours contact number/s:** 08 8080 3300 **Email:** Council@brokenhill.nsw.gov.au
Website address:	https://www.brokenhill.nsw.gov.au/Home
Scheduled activity/activities on EPL:	Waste processing (non-thermal treatment) Waste disposal (application to land) Waste Storage
Fee-based activity/activities on EPL:	Non-thermal treatment of hazardous and other waste Waste disposal (application to land) Waste Storage – waste tyres

4. POLLUTION INCIDENT – PERSON/S RESPONSIBLE

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

PIRMP activation:	**PRIMARY CONTACT** **Position or title:** Waste and Sustainability Manager **Business hours contact number/s:** 08 8080 3300 **After hours contact number/s:** 0427 997 354 **Email:** Council@brokenhill.nsw.gov.au **ALTERNATIVE CONTACT** **Position or title:** Waste Coordinator **Business hours contact number/s:** 08 8080 3300 **Email:** Council@brokenhill.nsw.gov.au
Notifying relevant authorities:	**Position or title:** Waste and Sustainability Manager **Business hours contact number/s:** 08 8080 3300 **Email:** Council@brokenhill.nsw.gov.au
Managing response to pollution incident:	**Position or title:** Waste Coordinator **Business hours contact number/s:** 08 8080 3300 **Email:** Council@brokenhill.nsw.gov.au

5. NOTIFICATION OF RELEVANT AUTHORITIES

The notification of the relevant authority when material harm to the environment is caused or threated must be 'immediate', meaning 'promptly without delay'. Where the pollution incident causes or threatens material harm to the environment or human health, the following authorities must be notified by those authorised to notify relevant authorities.

The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire and Rescue via a local telephone number (see Relevant Authorities Contact Details table).

Relevant authorities include:

- Fire & Rescue NSW and/or Rural Fire Service as applicable
- EPA
- NSW Health
- SafeWork NSW
- Broken Hill City Council

6. NOTIFICATION OF NEIGHBOURS AND THE LOCAL COMMUNITY

Council will notify neighbours initially by telephone, following up with 'door knocking' if unresponsive. If warnings are required, these can be issued via ABC radio and social media.

A summary of the neighbour notification procedure is provided in the Pollution Incident Decision Flow Chart in Appendix A.

7. DESCRIPTION AND LIKELIHOOD OF HAZARDS

The primary potential hazards to human health or the environment associated with the activity undertaken at this site – i.e. 'Pollution Incidents' - include the following:

- Identifying non-domestic quantities (more than 200 millimetres per tonne or 200 grams per tonne) of hazardous substances among waste;
- Surface or subsurface fires;
- Mixing of waste and stormwater;
- Identification of any failure of an environmental protection system;
- Identification of a significant difference in groundwater indicator parameters;
- Acts of vandalism or target of terrorist activity; or
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

Incidents can be classified as being of low, medium, or high risk of occurring (likelihood) based on the past history of the facility, an assessment of management procedures, staff training and site layout.

The impact of an incident can be classed as low, medium, or high based on the potential extent of off-site harm to humans and/or the environment.

The following is an assessment of potential pollution incidents and includes:

- **SURFACE OR SUBSURFACE FIRES**

  Active Landfill, Public Receival Areas and Recycling Facility

  The BHWMF often deals with the sorting and deposition of combustible waste, coupled with the storage and use of some highly combustible chemicals and fuels.

  Medium Likelihood – The likelihood of a fire within the active landfill area is relatively high, for example kerbside collection can include household fire embers and mulch can self-combust.

  Medium Impact – It is probable that a fire of this nature could be contained due to the procedures and equipment in place. Therefore, the impact is classed as medium.

  Contributing Factors – Factors which may increase fire risk include high winds, dry weather, prolonged periods of high temperatures and low humidity, spontaneous combustion, and hot embers in waste deliveries. Human errors made during waste screening and the poor maintenance of plant and equipment which may spark a fire.

  Maintenance and Inactive Areas

  Low Likelihood – The storage of potential accelerants such as maintenance chemicals and fuels is undertaken onsite, however as these are located in secure facilities and only utilised by trained staff, the risk is considered minimal.

  High Impact – If a fire were to initiate within the chemical storage areas, or in an inactive area of the site, there is a high risk of spread offsite and to susceptible surrounding low level stock grazing areas.

  Contributing Factors – Factors which may increase fire risk include high winds, dry weather, prolonged periods of high temperatures and low humidity.

- **MIXING OF WASTE AND STORMWATER**

  Low Likelihood – the site has a protective system of drainage, bunding and holding ponds which contain surface water and waste sufficient to manage a 1 in 100 year storm event. On-site roads are designed to channel and capture runoff. Evaporation rates are consistently high throughout the year due to low average annual rainfall and high annual average temperatures.

  Medium Impact – the site has a protective system of drainage, bunding and holding ponds which are likely to contain and prevent the immediate spread of surface water

and waste outside the premises. However, the impact is considered to be medium due to the stormwater channel running southwards from the south-west corner of the site. Any pollutants which manage to reach the stormwater channel could cause harm to properties and environmental habitats for some distance south of the site.

Contributing Factors – Prolonged periods of heavy rain and lack of surface water pond and site maintenance may increase risk.

- **IDENTIFICATION OF ANY FAILURE OF AN ENVIRONMENTAL PROTECTION SYSTEM**

  Low Likelihood – the site has a protective system of drainage, bunding and holding ponds, and the surface water and groundwater of the premises are regularly monitored.

  Low Impact – the site has a protective system of drainage, bunding and holding ponds and the surface water and groundwater of the premises are regularly monitored which means any failure in this environmental protection system is likely to be identified well before there is potential for impact outside of the site.

  Contributing Factors – Prolonged periods of heavy rain and/or a mechanical failure of the pump at the stormwater pond may result in the stormwater flowing directly into the adjacent stormwater channel without first being deposited back onto the active landfill cell.

- **IDENTIFICATION OF A SIGNIFICANT DIFFERENCE IN GROUNDWATER INDICATOR PARAMETERS**

  Low Likelihood – the site has a protective system of drainage, bunding and holding ponds, and the surface water, groundwater, surface gas and sub-surface gas of the premises is regularly monitored.

  Low Impact – the site has a protective system of drainage, bunding and holding ponds and the surface water and groundwater of the premises is regularly monitored which means any significant difference in groundwater indicator parameters is likely to be identified well before there is a potential impact outside of the site.

  Contributing Factors – Prolonged periods of heavy rain may increase risk.

- **ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY**

  Medium Likelihood – the site is enclosed by secure fencing and some sections of the site are covered by CCTV cameras. Although the site is of limited strategic value in terms of being a potential target for terrorism, the premises may prove attractive to arsonists as it is isolated from habited areas and deals with the sorting and deposition of combustible waste, coupled with the storage and use of often highly combustible chemicals.

  Medium Impact – the site is surrounded by low level stock grazing areas susceptible to fire.

  Contributing Factors –Increased risk during hours of closure and during sustained periods of hot and dry weather.

- **ANY OTHER INCIDENT OR OBSERVATION THAT COULD POTENTIALLY POSE AN IMMEDIATE ENVIRONMENTAL HAZARD OUTSIDE NORMAL OPERATING CONDITIONS**

  Low Likelihood – The site has significant and advanced environmental protection measures and monitoring equipment.

  Low Impact – The site has significant and advanced environmental protection measures and monitoring equipment which are likely to identify, contain and prevent the immediate spread of environmental hazards outside of the premises even outside of normal operating conditions.

  Contributing Factors – N/A.

  Medium Likelihood – Non-domestic quantities of hazardous waste could be discovered at point of entry into the site, during waste deposition, and/or during waste / recycling spreading, sorting and/or compaction.

Low Impact – The site has a protective system of drainage, bunding and holding ponds which are likely to contain and prevent the immediate spread of hazardous substances outside of the premises.

Contributing Factors – Human errors made during waste screening, or deception by landfill patrons.

8. PRE-EMPTIVE ACTIONS TO BE TAKEN

The following provides a detailed description of the pre-emptive 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.

- **IDENTIFYING NON-DOMESTIC QUANTITIES OF HAZARDOUS SUBSTANCES**

  The following practices apply to screening of incoming wastes:

  - Public access is only permitted during opening hours;
  - Drivers are asked to describe the type of waste to be deposited on entry to the Facility;
  - Inspections of waste loads are made when required;
  - Drivers are directed to the correct area of the facility for disposal of specific loads (e.g. builder's wastes, greens, whitegoods, tyres, derelict cars etc.);
  - Wastes are monitored and inspected as they are being discharged to ensure excluded non-approved wastes are not being disposed; and
  - Wastes are monitored and inspected during spreading, compaction and covering.

  The following steps are undertaken if non-domestic quantities of hazardous wastes are identified.

  - If identified at point of entry the vehicle is refused entry and the driver advised to contact the EPA for advice on proper disposal of the hazardous waste.
  - If identified during waste deposition the waste facility operators immediately advise the waste leading hand (Landfill Supervisor). The supervisor advises the driver that the waste is not acceptable and organises for the waste to be loaded back onto the vehicle, where practicable and safe to do so. The supervisor then escorts the load off-site and advises the driver to contact the EPA for advice in the proper disposal of the excluded waste.
  - If identified during waste spreading and compaction the waste facility operators immediately notify the waste leading hand (Landfill Supervisor). The supervisor makes all practicable efforts to identify the source of the waste (e.g. labelling, waste type). The supervisor is then responsible for contacting the EPA for advice on the proper disposal of the hazardous waste and will dispose of the hazardous waste in accordance with the EPA's requirements. In the event that the EPA cannot be contacted, the wastes will be relocated to the contaminated waste area for isolation. Depending on volume, larger hazardous waste items will be removed to the contaminated waste area for isolation.

- **SURFACE OR SUBSURFACE FIRES**

  The potential for fires to occur at the site are controlled by:

  - A security fence to prevent unauthorised access and acts of vandalism;
  - Maintaining machinery in good working order to minimise risk of sparks;
  - Smothering immediately with soil or water sprayed from the water cart;
  - Adequately compacting and covering waste;
  - Mulched green waste has the capacity to spontaneously combust. This risk is minimised via shaping into divided windrows (i.e. small cones) to isolate/contain any fires;

- Regular litter patrols;
- Ensuring fire breaks are maintained around any temporary stockpile of combustibles;
- Access to on-site firefighting equipment; and
- Accepting only permitted wastes.
- In addition to the above preventative measures, operators at the Facility maintain the firefighting equipment to ensure that the on-site firefighting capability is maintained. Specifically, this involves:
- Ensuring that the water cart permanently located at the facility is full at all times and that it is positioned in a readily accessible location;
- Weekly testing of the tanker pump and checks that the motor is topped with fuel and oil; and
- Weekly checks that the overhead standpipe that feeds the water cart is functional.

- **MIXING OF WASTE AND STORMWATER**

  The potential for the mixing of waste and stormwater is controlled by ensuring that the level of the surface water ponds is regularly checked. If the level of a pond is too high and at risk of flooding, then the excess water is pumped back onto the active landfill site to create airspace.

- **ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY**

  The boundary road fence along Depot Road and Wills Street limits unauthorised access outside operational hours. All staff are required to be vigilant and aware that the site is a potential target for vandalism, particularly by arsonists. The boundary fence is checked daily and maintained as required following these checks.

9. INVENTORY OF POLLUTANTS

LOCATION/TANK	MAXIMUM QUANTITY	CONTENTS	COMMENTS
Oil Tank - CRC	55,000L	Waste Oil	Maximum of 2,500L on site at any given time.
Diesel Tank	2,000L	Diesel	Double Bunded
Asbestos Pit	125 tonnes	Asbestos Waste	Asbestos received and covered in accordance with EPAs Asbestos guidelines
SLUDGE PIT	200L		Grease trap and septic

10. SAFETY EQUIPMENT

The BHWMF maintains a water cart which consists of a 15,000 litre water truck, pump and hose. This can be mobilised immediately to the site of a fire as and when required. The Waste Transfer, weighbridge and shed is protected from fire by several hose reels, fire extinguishers and hydrants.

To manage leaks, chemicals such as diesel fuel are kept on mobile self-bunded trolleys to allow their safe use in less well protected areas of the site. Spill Sorb (or similar) is present on site to manage fuel and oil spills and is located at the CRC. The used Spill Sorb is then deposited in the landfill. In the event of a chemical spill, PPE is provided for onsite staff which consists of safety goggles, safety vests, ear plugs and protective gloves.

Staff are required to wear steel cap boots, long pants and long sleeve high visibility shirts at all times whilst on site.

The extra protective gear of safety glasses, ear plugs and protective gloves are also stored on site. These are checked daily and replaced if required.

Spill kits are provided at the waste oil area, the new shed/lunchroom area and at the bitumen area.

11. 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 out:

- **KEY MECHANISMS**

  Neighbours to be notified in the event of an incident causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the *Environment Operations Act 1997 Act* which proposes a threat to the off lease surrounding environment.

  Council will notify neighbours initially by telephone, following up with 'door knocking' if unresponsive. If warnings are required, these will be issued via Media release, Council webpage, Council social media, radio and newspaper adverts.

  The following will 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

  Specific information to be provided to the community in the event of an incident so it can minimise the risk of harm will include but not limited to:

- **KEY MESSAGING**
  - Details of type of incident
  - Potential threats of the incident
  - Likelihood of the incident and/or impacts

- Timeframe of incident and clean-up operations
- Primary community contact regarding the incident
- How community members should respond (e.g. lock windows and stay indoors, leave the neighbourhood)
- Any land or waterways where contact should be avoided

In the event that a pollutant extends outside the facility, Council may erect signage in prominent locations to warn users of possible contamination and to advise that affected area. 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.

12. MINIMISING HARM TO PERSONS ON THE PREMISES

In the event of a pollution incident occurring, all members of the public and other Council staff will be mustered by Council site staff to the Emergency Assembly Point at the front entrance of the facility (identified on Site Plan 09A_EV03), after which they will be safely evacuated from site where appropriate. It is a condition of entry that in the event of an emergency, both the public and staff must adhere to directions given by the Site Supervisor.

13. MAPS

Maps are attached in Appendix F.

14. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFETER A POLUTION INCIDENT

All site personnel with relevant training must make every effort to contain the pollution incident on site, without putting themselves at risk of harm.

In the case of a fire, attempts must be made – where safe – to extinguish or contain the fire immediately. This could be through the use of a fire extinguisher, fire hose, water cart or smothering with cover material. Fire bridge must be notified.

In the event of a chemical spill that is not contained by bunding, Spill Sorb (or similar) must be used to restrict the spread of the chemical.

If the surface water ponds are nearing capacity, staff must initiate pumping of liquid back to the active landfill to retain headspace. If pollution is identified through groundwater or surface monitoring, procedures identified in the LEMP will be followed.

It is possible that dumping of hazardous waste may occur outside the boundary, but in close visual proximity to the BHWMF outside of normal operational hours. In this instance, if the pollution is a risk of material harm to the environment and/or human health then the local fire brigade should be contacted immediately. The initial response to the pollution and assessment of the situation thereafter will be managed by the local fire brigade. Refer to Document A – Pollution Incident Decision Flow Chart in Appendix A for details.

The notification of the relevant authority when material harm to the environment is caused or threated must be '*immediate*', meaning '*promptly without delay*', but it does not mean undertaking notification ahead of doing what is necessary to make the environment safe.

Develop a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk:

In the event of a pollution incident occurring during operational hours of 8am to 4pm, contact is to be made to the weighbridge operator (0409 702 911) who will initiate the sound alarm advising everyone within the facility that an incident has occurred and to commence

evacuation. Council site staff will immediately attend the access gate to ensure no members of the public enter the premises. All members of the public and other Council staff will be mustered by Council site staff to the Emergency Assembly Point at the front entrance of the facility (identified on Site Plan **09A_EV03**), after which they will be safely evacuated from site where appropriate.

It is a condition of entry that in the event of an emergency, both the public and staff must adhere to directions given by the Site Supervisor.

Identify any actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

- **Hazardous Waste including Illegal Asbestos**
  - Non-domestic quantities of hazardous waste and/or asbestos could be discovered at point of entry into the site, during waste deposition, and/or during waste/ recycling spreading, sorting and/or compaction.
  - If handled inappropriately Hazardous Waste including Illegal Asbestos can be a major health hazard to workers and the public.
  - Hazardous Waste including Illegal Asbestos must be managed in line with Council's procedures and the LEMP
  - If Hazardous Waste including Illegal Asbestos is found inappropriately dumped, the following procedure will be followed:
    - Evacuate immediate area. If discovered at the Waste Transfer Station, the whole facility is to be evacuated following the evacuation plan.
    - Workers attending the incident must have full PPE including suit, gloves and mask.
    - Water truck to be employed to water down contaminant to eliminate windblown particle emission
    - Double wrap in plastic and remove to asbestos pit
    - Bury as per asbestos procedure outlined in the LEMP
- **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 is deep, dig it out with an excavator.
- **Fire in Green Waste**

  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.

15. COORDINATING WITH PERSONS

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified:

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 the supervisor.
- Then, if not already aware of the incident, the Waste and Sustainability Manager and/or Waste Coordinator must be notified where a decision is made on whether to notify external authorities.

In all situations pollution incidents must be lodged in the IQ Vault app. Internal incident reports are investigated, and corrective actions instigated in accordance with Council procedures.

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

ii. There is actual or potential harm to human health or safety

Identify the person/s through whom all communications are to be made:

- Notification to authorities will occur at the level of Manager (or someone delegated by the Manager), 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 must immediately call the relevant external authorities.
- Notification is made by contacting relevant external authorities listed under Notification of relevant authorities in 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.

16. STAFF TRAINING

Identify the nature and objectives of any staff training program in relation to this plan:

All staff and relevant contractors will be inducted under the new plan; further inductions will be completed for new staff members as required. The induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

All staff should receive sufficient training to enable them to carry out their assigned duties in a competent and safe manner. In particular:

- Staff must be capable of using the fire-fighting equipment;
- Staff must be capable of identifying excluded wastes;
- Staff must be capable of identifying potential pollution incidents; and
- Staff must be familiar with the requirements and procedures contained within this PIRMP.

Staff competency will be monitored through audits, public complaints, and pollution incident reports.

At least once every year staff should undertake a simulated pollution incident response exercise, including with emergency services, to familiarise site personnel with the requirements of this management plan. A register of staff training can be found in **Appendix A** and must be kept on site and updated regularly.

Regular site briefings and toolbox meetings should be held when considered appropriate to draw attention to potential pollution incidents and identify improvements to on-site safety procedures.

Consideration of **Section 3.2** '*Site Supervision, Control and Training'* in the Landfill Emergency Management Plan is required, and the staff training register (**Form 3.14c**) is to be updated as required.

17. TESTING AND UPDATING THE PIRMP

The PIRMP is a living document required to be reviewed, tested and updated at least once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring. For these reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use. Details of the version and date of issue are recorded on each page of the PIRMP in the bottom left hand corner.

Revised and updated versions of the PIRMP will always be issued with a covering memo summarising the changes. When a new PIRMP is received the old version is replaced in its entirety. A register for updating and testing the PIRMP can be found in Appendix A and must be kept on-site and updated regularly.

Four copies of any new PIRMP will need to be produced. They are to be distributed to the following:

- General Manager (or delegate), Broken Hill City Council;
- Waste and Sustainability Manager, Broken Hill City Council;
- Waste Coordinator, Broken Hill City Council; and
- Administration Manager, Broken Hill City Council.

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.

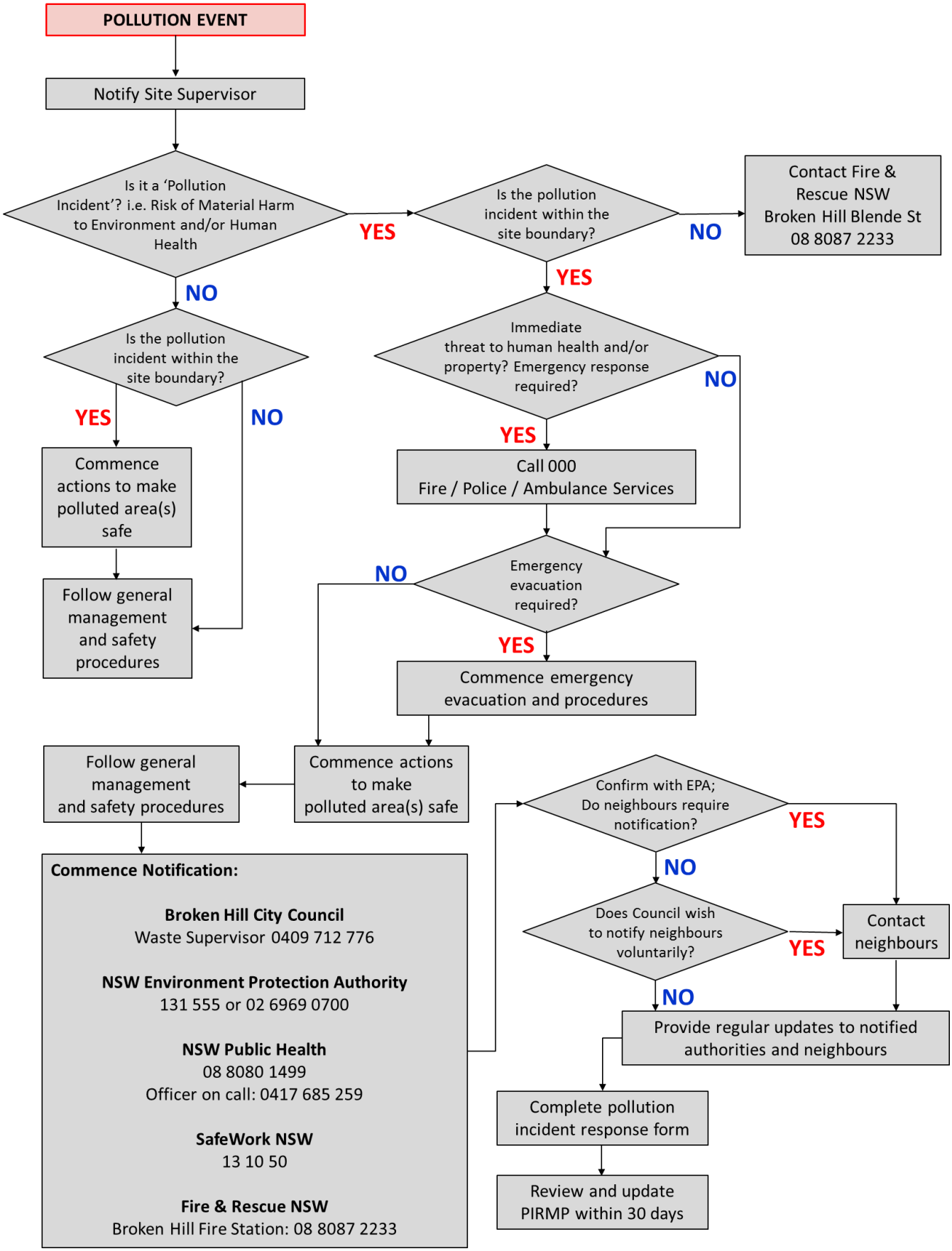
Detail the dates on which the plan was updated and tested are outlined in Appendices D and E - PIRMP Testing Register and PIRMP Update Register.

APPENDICES

APPENDIX A – POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

DESCRIPTION OF POLLUTION INCIDENT	LIKELIHOOD	IMPACT	CONTRIBUTING FACTORS
Identifying non-domestic quantities of hazardous substances among waste	Medium	Low	Human errors made during waste screening. Deception by landfill patrons.
Surface or subsurface fires at active landfill, public receival areas or recycling facility	Medium	Medium	High winds, dry weather, prolonged high temps and low humidity. Human errors made during waste screening, poor maintenance of plant and equipment, spontaneous combustion, hot embers in waste deliveries.
Surface or subsurface fires at maintenance and inactive areas	Low	High	High winds, dry weather, prolonged high temps, low humidity and spontaneous combustion.
Mixing of waste and stormwater	Low	Medium	Prolonged periods of heavy rain, and lack of surface water pond and site maintenance.
Identification of any failure of an environmental protection system	Low	Low	Prolonged periods of heavy rain and/or a mechanical failure of the pump at the leachate pond.
Identification of a significant difference in groundwater indicator parameters	Low	Low	Prolonged periods of heavy rain
Acts of vandalism or target of terrorist activity	Medium	Medium	Increased risk during hours of closure
Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions	Low	Low	n/a

APPENDIX B – POLLUTION INCIDENT DECISION FOW CHART



APPENDIX C – POLLUTION INCIDENT REPORTING FORM

BROKEN HILL CITY COUNCIL

POLLUTION INCIDENT REPORTING FORM

Office Hours: 8.30am – 5pm

240 Blende Street
PO Box 448
Broken Hill NSW 2880
council@brokenhill.nsw.gov.au
www.brokenhill.nsw.gov.au
General Enquiries
Phone: 08 8080 3300

INCIDENT NO:	TIME:
DATE:	**DURATION OF INCIDENT:**

NATURE OF INCIDENT:

TEMPERATURE:	**°C**	**WIND DIRECTION & SPEED:**	**KM/HR**
RELATIVE HUMIDITY:	**%**	**RAINFALL SINCE 9AM:**	**MM**
FIRE DANGER RATING:			

THE LOCATION OF THE PLACE WHERE POLLUTION IS OCCURRING OR IS LIKELY TO OCCUR:

THE NATURE, THE ESTIMATED QUANTITY OR VOLUME, AND THE CONCENTRATION OF ANY POLLUTANTS INVOLVED:

THE CIRCUMSTANCES IN WHICH THE INCIDENT OCCURRED, INCLUDING THE CAUSE OF THE INCIDENT:

THE CORRECTIVE ACTION TAKEN OR PROPOSED TO BE TAKEN TO DEAL WITH THE INCIDENT AND ANY RESULTING POLLUTION OR THREATENED POLLUTION:

NOTIFIATIONS:		
STAKEHOLDER	**DATE / TIME**	**CONTACT**
Broken Hill City Council	/ / AM/PM	
NSW Environment Protection Authority	/ / AM/PM	
NSW Public Health	/ / AM/PM	
SafeWork NSW	/ / AM/PM	
NSW Fire & Rescue	/ / AM/PM	

NOTIFICATION OF NEIGHBOURS REQUIRED BY EPA:	
YES ☐	NO ☐
IF NOT, HAVE NEIGHBOURS BEEN NOTIFIED VOLUNTARILY:	
YES ☐	NO ☐

PARTICULARS:

DECLARATION:	
SIGNATURE:	DATE: / /
SIGNATURE: CHIEF OPERATIONS OFFICER	DATE: / /

APPENDIX D – PIRMP TESTING REGISTER

DATE TESTED	TESTED BY	DETAILS OF TEST	FINDING OF TEST, including issues identified	NEXT SCHEDULED TESTING DATE (must be within 12 months from current test)
October 2015	Brendan Stuart (Geolyse)	Simulations: 1. Excluded waste rejected 2. Fire (lightning) at tipping face 3. Unidentified waste observed	Contact details out of date	
September 2016	Training of all waste staff completed 2 September and 6 September 2016.	Testing with scenarios. Training completed internally	Process reviewed and found adequate following two fires on site – May 2016 and July 2016	
September 2017	Training of all waste staff completed 27 September and 28 September 2017.	Testing with scenarios. Training completed internally		
October 2020	Internal Waste and Sustainability Manager	Desktop review	Contact details out of date. Plan updated in line with new guidelines	September 2021
September 2021				

APPENDIX E – PIRMP UPDATE REGISTER

DATE UPDATE OCCURRED	REASON FOR UPDATE	DETAILS OF UPDATES	DATE THE UPDATED VERSION UPLOADED TO WEBSITE	DATE OF COMPLETION	DISTRIBUTED
March 2013	Annual Review	Contact Details Content Check Website Upload	March 2013	March 2013	Trimmed electronically and copy provided for landfill
September 2014	Annual Review	Content Check Contact Details	October 2014	October 2014	Trimmed electronically and copy provided for landfill
October 2015	Annual Review	Content of document updated to reflect changes at the facility, contact numbers checked and updated as required			Trimmed and updated copies provided for landfill. Senior staff notified that updated copies are now available
September 2017	Annual Review	Content updated to reflect changes on site including hours and operations. Contact details checked and updated where required.			Saved in TRIM (version 8). Copies provided to staff in training sessions and copies taken to landfill.
February 2019	Review	Contact Details Content Check and corresponding amendments.			
December 2019	Update/review after fire incident	Contact Details Updated to reflect new guidelines Community notification response updated Pollutant register updated Maps updated			
September 2020	Review and update to new 2019 Guidelines	Contact Details Content Check Website Upload			

APPENDIX F – PLANS

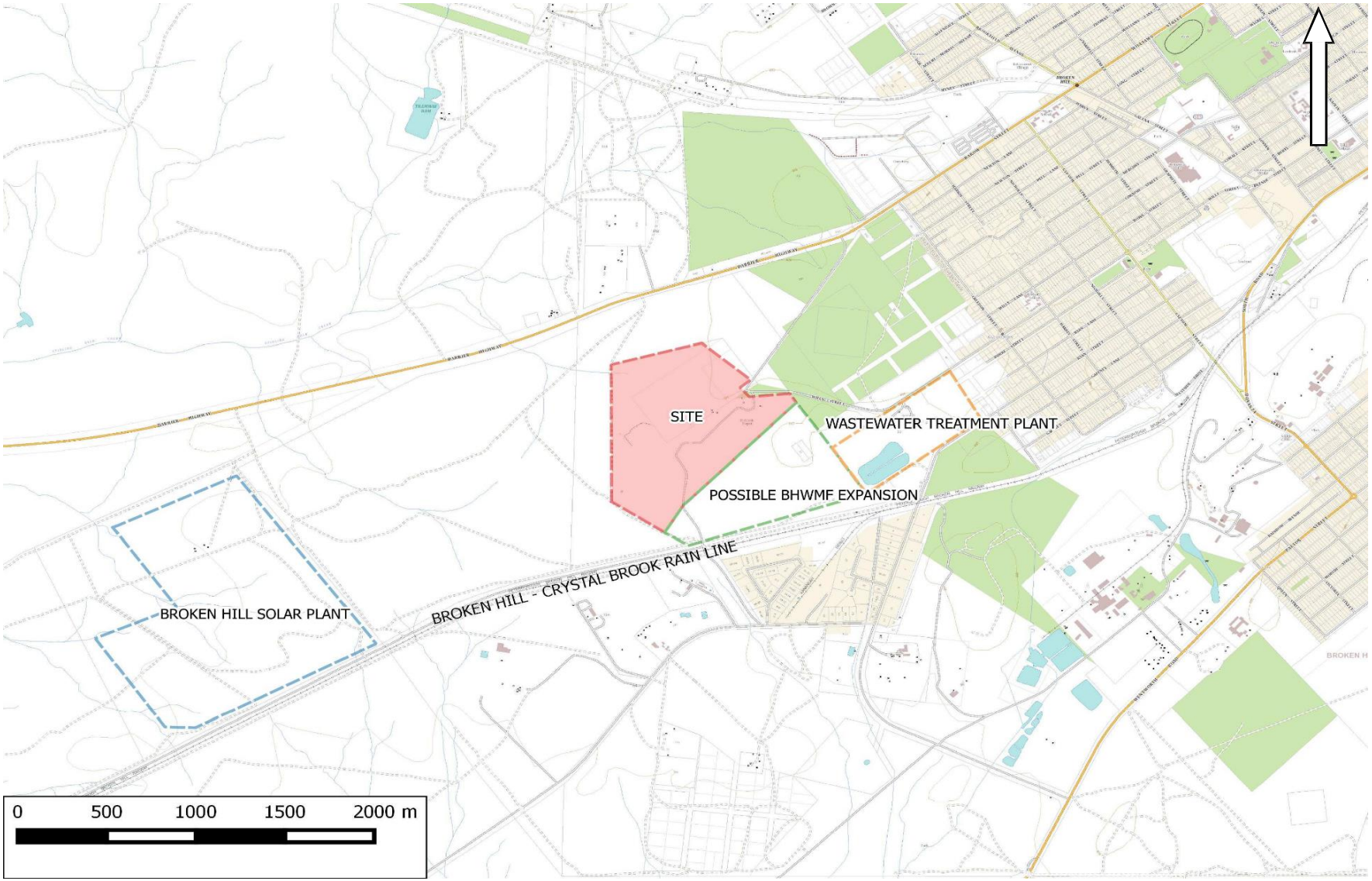


Figure 1. Broken Hill Waste Management Facility locality map

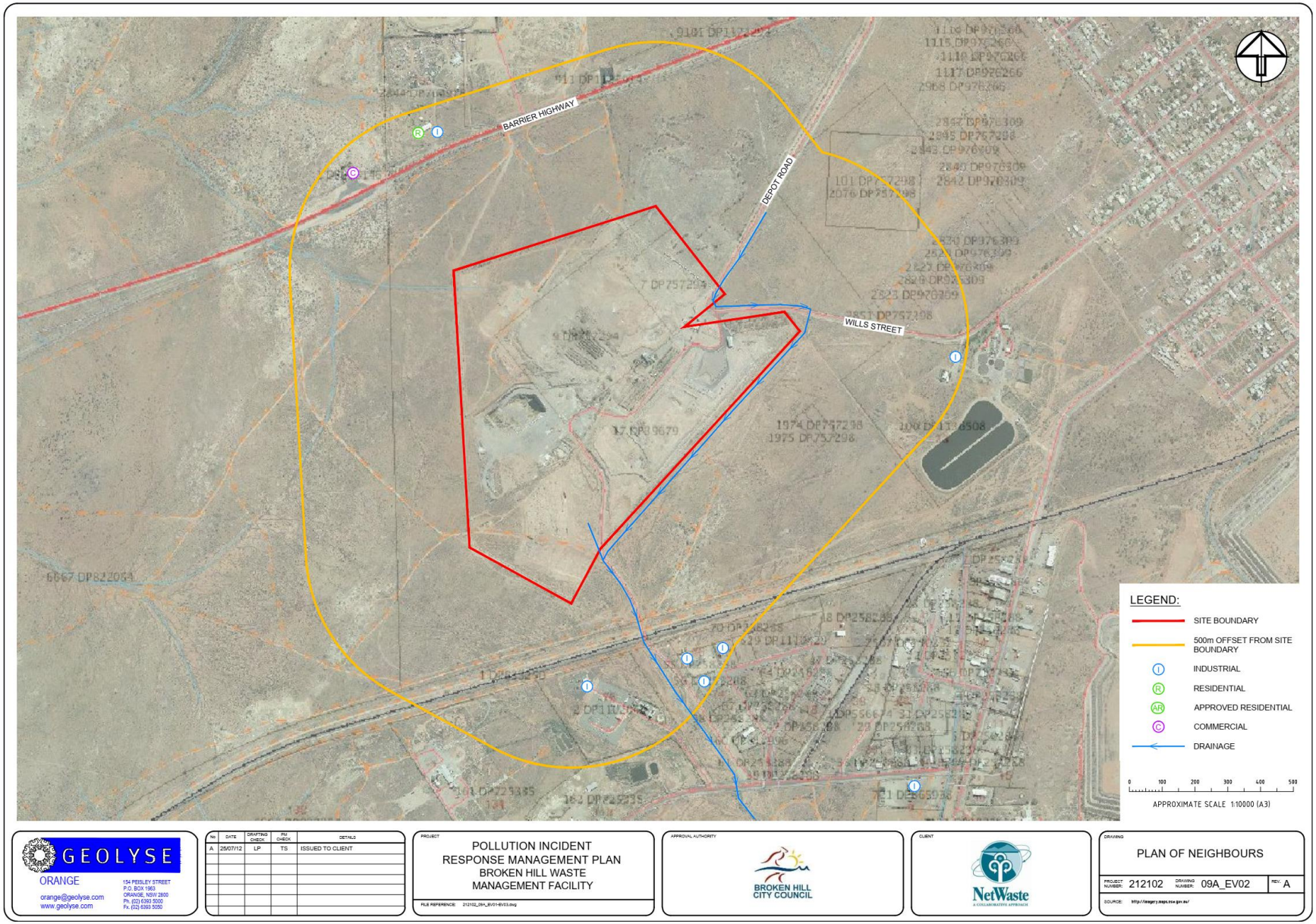


Figure 2. Broken Hill Waste Management Facility surrounding environment

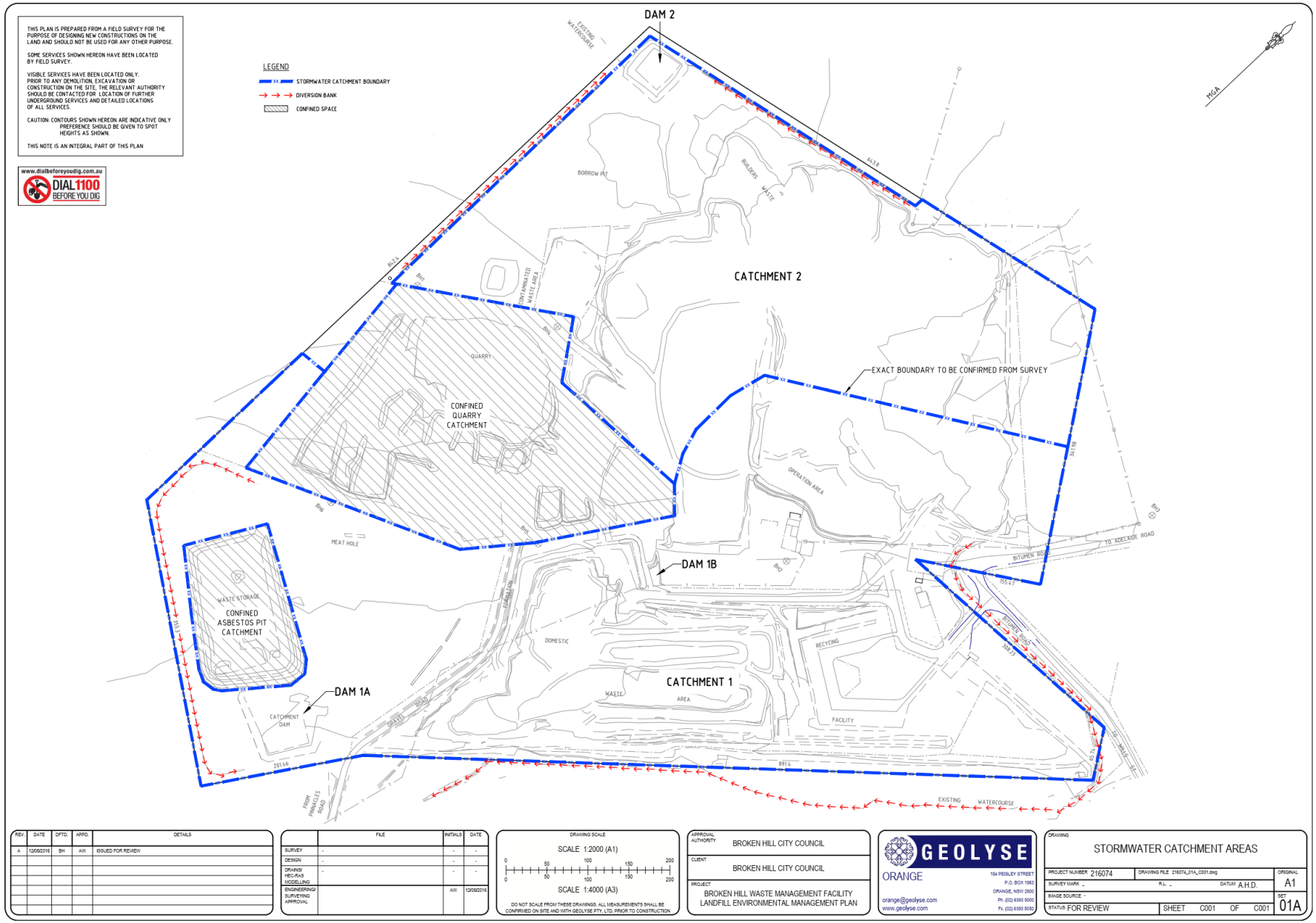


Figure 3. Broken Hill Waste Management Facility Stormwater Catchment Areas

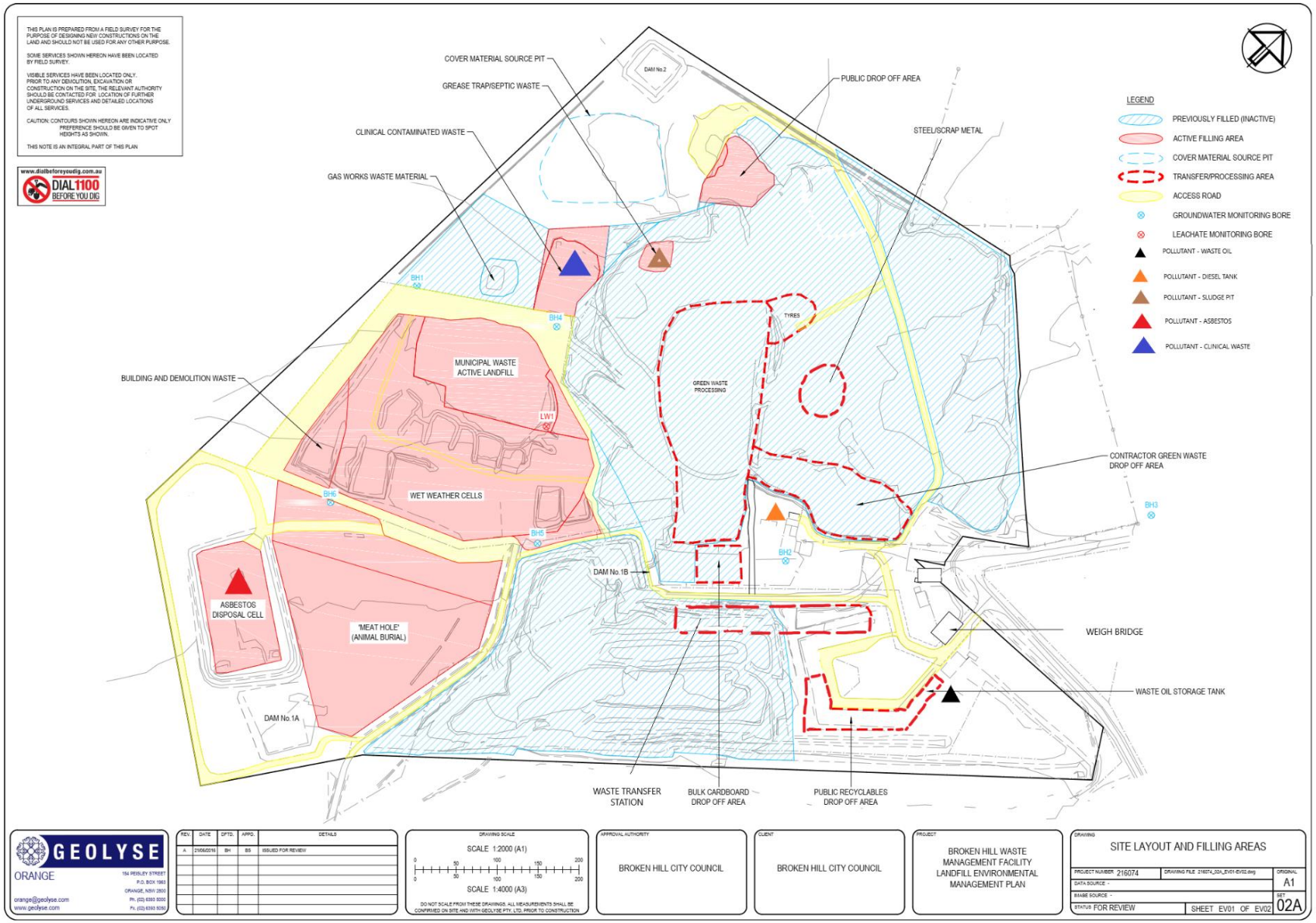


Figure 4. Broken Hill Waste Management Facility Layout Plan showing pollutant locations

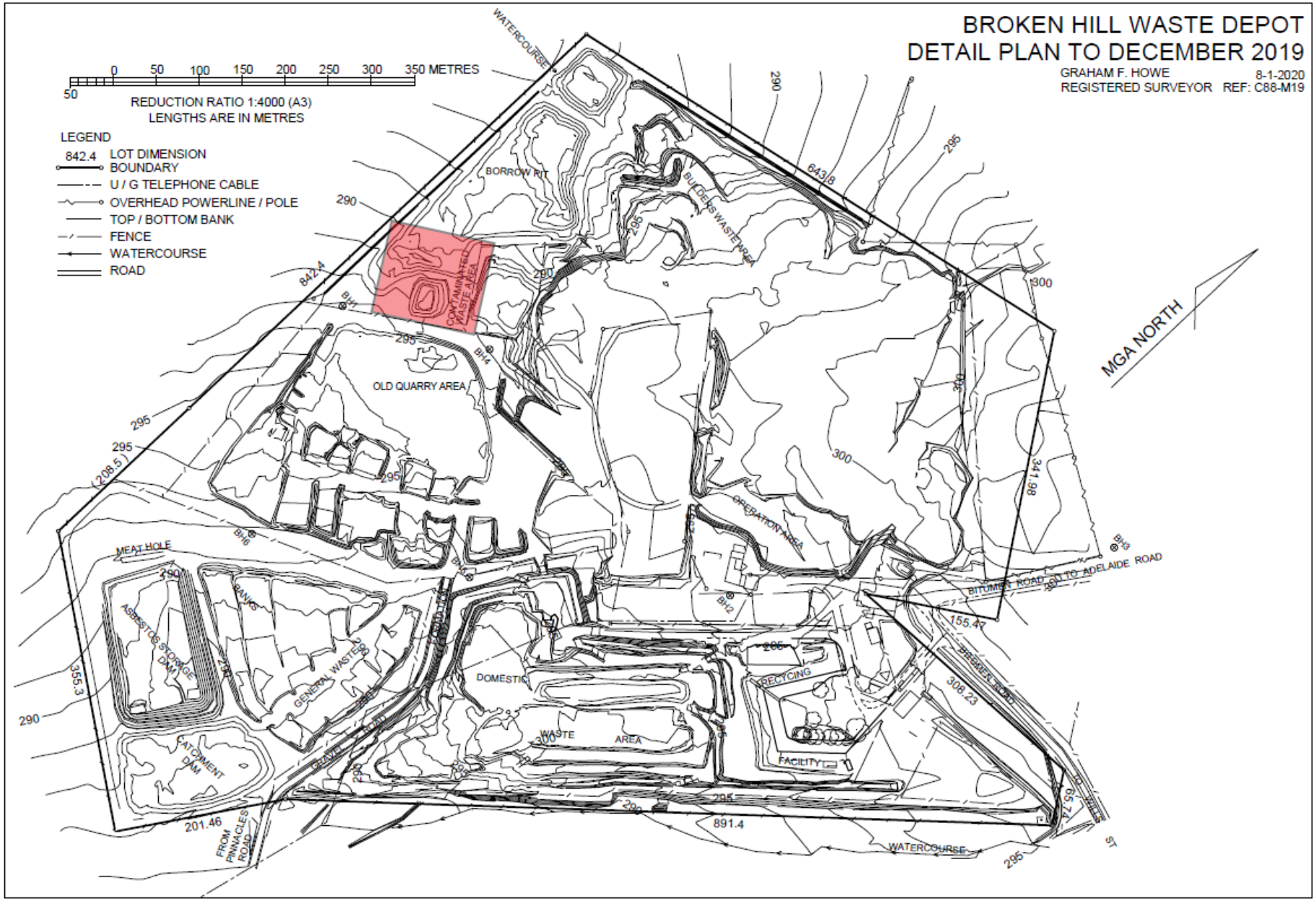


Figure 5. Broken Hill Waste Management Facility 2019 Survey Plan

BROKEN HILL

CITY COUNCIL

www.brokenhill.nsw.gov.au