

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

FORBES CENTRAL WEST LIVESTOCK EXCHANGE – FORBES SHIRE COUNCIL



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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN.

CENTRAL WEST LIVESTOCK EXCHANGE – FORBES SHIRE COUNCIL

INTRODUCTION

1.1 PURPOSE

This Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with the *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)* and reflects the requirements specified in the Environment Protection Authority (EPA's) *Guidelines: Preparation of Pollution Incident Response Management Plans, March 2012*.

The PIRMP details:

- Procedures for notifying a pollution incident to relevant persons.
- Actions to be taken to reduce and/or control pollution, and
- Procedures for co-ordinating those notified and any action taken in combating the pollution.

1.2 DEFINITION OF POLLUTION INCIDENT

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the Protection of the Environment Operations Act 1997 (POEO Act);

- (a) Harm to the environment is material if;
 - I. It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - II. It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

1.3 IDENTIFIED POLLUTION INCIDENT RISKS

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;

- Overflow animal waste (Effluent) to the environment
- Stormwater contamination when it comes into contact with animal holding pens, sludge stockpiles and treated wastewater irrigation areas.

- Identification of any failure of an environmental protection system due to solid waste (Manure is generated in animal holding areas, Primary and secondary effluent treatment sludges are generated in the treatment ponds, etc) generating in the saleyard.
- Identification of a significant difference in soil parameters where treated effluent discharge areas.
- Odour (Odours in animal holding pens are produced by manure and urine)
- Noises which are generated by several sources (animals, especially when in concentrated groups, machinery, plant and service vehicles, heavy vehicles, crowds, etc)
- Potential of the transmission of zoonotic diseases (such as Q-fever and anthrax) to humans (People who have had direct contact with infected stock/animals).
- Any other incident or observation that could potentially pose an immediate environmental /human hazard outside normal operating conditions.

SITE OVERVIEW

2.1 SITE OVERVIEW

The Forbes Central West Livestock Exchange (CWLE) opened in 2006 when the cattle auction facility was completed. The sheep auction facility and the pig auction facility were opened in late 2010 and early 2012 respectively.

The Forbes Central West Livestock Exchange is located at Daroobalgie, approximately 12km north of Forbes and is positioned just off the Newell Highway. Cattle sales, sheep sales and pig sales are conducted each Monday, each Tuesday and every second Friday respectively, with store cattle sales being held monthly and other special sales being conducted on an as need basis.

The Environment Protection Authority (EPA) has issued ***Environment Protection Licence 12375 for the Forbes Central West Livestock Exchange***. Under this licence, reportable incidents are causing or threatening, material environmental harm to the environment which is set out in accordance with Section 5.7 of the POEO Act 1997. The licence requires that the total quantity of animal accommodation at the premises must not exceed 25000 T.

2.2 SITE CHARACTERISTICS

The CWLE is located in Back Yamma road (Daroobalgie), approximately 12km north of Forbes (Site Locality Plan is attached in **Appendix A (PIRMP)**). It comprises DP 1143576 and DP 1152992 within the parish of Forbes , County of Ashburnham.

The area surrounding the facility to the north, east, south and west is predominantly rural pasture lands. The nearest residential/industrial property to the facility is located approximately 1km to the east of the western boundary.

The Site has access via Back Yamma road , with an internal road network. The site topography and drainage have been designed to ensure that there is negligible stormwater runoff into and out of site. Site generated stormwater is collected through an internal drainage system.

2.3 SITE SAFETY EQUIPMENTS

Mainly the CWLE is protected from fire using fire hose reels and fire extinguishers.

Further, Personal Protective Equipment (PPE) is provided for onsite staff which consists of;

- Ear/hearing protection
- Sun screen
- Rubber Gloves
- Safety Glasses
- Gumboots
- Steel capped Boots
- Clothing
- Broad Brimmed Hats

RISK MANAGEMENT AND PRE-EMPTIVE ACTIONS

3.1 LIKELIHOOD, IMPACT AND CONTRIBUTING FACTORS TO POLLUTION INCIDENTS OCCURING

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 table is summarised the assessment of the identified potential pollution incidents at CWLE.

Pollution Incident	Contributing Factors	Impact	Risk Rating (LxC=)	Controls
Overflow animal waste (Effluent) to the environment	Prolonged periods of heavy rain and lack of site maintenance	Land contamination, possibly enter a waterway	B3 = M	The site has a protective effluent collection system Regular, proper maintenance of animal waste (effluent) collection ponds
Stormwater contamination when it comes into contact with animal holding pens, sludge stockpiles and treated wastewater irrigation areas	Prolonged periods of heavy rain and lack of site maintenance	Land contamination	B2 = L	The site has a protective system of drainage. Proper site maintenance
Identification of any failure of an environmental protection system due to solid waste (Manure is generated in animal holding areas, Primary and secondary effluent treatment sludges are generated in the treatment ponds, etc) generating in the saleyard	Prolonged periods of heavy rain and lack of site maintenance	Land contamination	B2 = L	Proper site maintenance
Identification of a significant difference in soil parameters where treated effluent discharge areas	Prolonged periods of heavy rain and lack of monitoring	Land contamination	A2 = L	Maintain regular testing
Odour (Odours in animal holding pens are produced by manure and urine)	Lack of site maintenance, extreme weather	Effect the people on site and the surrounding neighbourhood, Air	A1 = L	Proper site maintenance

Noises which are generated by several sources (animals, especially when in concentrated groups , machinery , plant and service vehicles, heavy vehicles, crowds, etc)	condition (high wind) Lack of planning for animal activities on site	pollution Effect the people on site and the surrounding neighbourhood, Air pollution	B2 = L	The site has been installed the noise measuring devices and keep regular monitoring
Potential of the transmission of zoonotic diseases (such as Q-fever and anthrax) to humans (People who have had directly contact with infected stock/animals).	Lack of knowledge to follow the safety procedures on-site.	Health issues for the people who are onsite	B3 = M	The site has significant and advanced protection measures and monitoring schedules which are likely to prevent the immediate spread of health hazards.
Any other incident or observation that could potentially pose an immediate environmental /human hazard outside normal operating conditions	N/A	Effect the people and /or environment	A2 = L	The site has significant and advanced environmental protection measures and monitoring schedules which are likely to contain and prevent the immediate spread of environmental hazards outside the premises

Likelihood	Consequences	Rating	Likelihood				
			A	B	C	D	E
A – IMPROBABLE - May occur only in exceptional circumstances	1. INSIGNIFICANT – No injuries, minimal level of pollution, Employee grievances dealt with on site, Loss <5% of job cost. Services, business failure resulting in delay < 1 week and costs plant/equipment loss < \$ 1,000	L - LOW					
B – REMOTE – Could occur at some time	2. MINOR – First Aid treatment, limited / localised impact, Employee grievances dealt with senior management, Loss 5 - 10% of job cost. business failure resulting in delay < 1 month and costs plant/equipment loss < \$ 10,000	M - Medium	L	L	L	M	H
C – OCCASIONAL – Might occur at some time	3. MODERATE – Medical treatment & several days off work, significant pollution requiring outside assistance, Employee grievances taken to the union, Loss 10 - 20% of job cost. Non compliance with legislations/Licence conditions, business failure resulting in delay < 3 months and costs plant/equipment loss < \$ 50,000	H - High	L	L	M	H	V
D – FREQUENT - Will probably occur in most circumstances	4. MAJOR – Long term illness/serious injury, significant pollution requiring outside assistance and long term environmental damage, Threatened industrial action, Loss 20 - 70% of job cost. Loss of production capability, Order placed on Council by Authorities, business failure resulting in delay < 6 months and costs plant/equipment loss < \$ 100,000	V - Very High	M	M	H	V	X
E – CONTINUOUS – Is expected to occur in most circumstances	5. CATASTROPHIC – Death or permanent disability illness, serious permanent environmental damage, Actual industrial action, Loss > 70% of job cost. Potential prosecution by Authorities, business failure resulting in delay > 6 months and costs plant/equipment loss > \$ 100,000	X - Extreme	H	H	V	X	X
<i>Refer also to Council's Hazards, Risk and Controls Guidelines</i>			V	V	X	X	X

NOTIFICATION OF POLLUTION INCIDENTS

4.1 NOTIFICATION SPEED OF RESPONSE

The requirement for notification of a pollution incident has changed from 'as soon as practicable' to 'immediately' (section 148 of the POEO Act 1997). In short, 'immediately' means 'promptly without delay', but it does not mean undertaking notification ahead of doing what is necessary to make safe.

4.2 RESPONSIBLE KEY PERSON(S) FOR NOTIFICATION

	Name(s)	Position(s)	Contact Detail(s)
Person who is responsible for and authorised to activate plan	Cassi Walmsley	Saleyards Supervisor	0417 803 577
Person who is authorised to liaise with the relevant authority	John Zannes	Director Engineering and Technical Services	0447 345 133
	Cassi Walmsley	Saleyards Supervisor	0417 803 577
Person who is responsible for managing the response to a pollution incident	John Zannes	Director Engineering and Technical Services	0447 345 133

4.3 NOTIFICATION OF RELEVANT AUTHORITIES

Where the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the Saleyards Supervisor;

	Relevant Authority	Contact Number
1	<p>Emergency Call Services</p> <ul style="list-style-type: none"> Emergency Hotline Number (24 Hours) <p><i>(*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 Rescue via a local telephone number)</i></p>	000* ('112' if using a mobile)

2	Forbes Shire Council <ul style="list-style-type: none"> • Engineering Department – Forbes Shire Council • Director Engineering and Technical Services – FSC • Council Emergency contact number (After Hours) 	02 6850 2874 0428 634 893 1 300 978 633
3	The Environmental Authority (EPA) <ul style="list-style-type: none"> • Bathurst Regional Office • Emergency Hotline Number (24 Hours) <p><i>Note : The Emergency Hotline Number must be called if there is a possible threat of material harm to people or the environment.</i></p>	02 6332 1838 131 555
4	NSW Ministry of Health (via Public Health Units) <ul style="list-style-type: none"> • Bathurst Regional Office • Public Health Office on Call (24 Hours) 	02 6339 5601 0428 400 526
5	WorkCover NSW <ul style="list-style-type: none"> • Hotline Number 	13 10 50
6	Fire & Rescue NSW <ul style="list-style-type: none"> • Forbes Fire Station 	02 6851 1843**
(**If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the Saleyards Supervisor is still required to follow that outlined above except for dialling 000)		

4.4 INFORMATION TO BE NOTIFIED

Under the section 150 of the POEO Act 1997, the information about a pollution incident that must be notified is;

- The time , date, nature duration and location of the incident
- 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 pollutant involved (if known)
- The circumstances in which the incident occurred, including the cause of the incident (if known)

- The actions taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution (if known), and
- Other information prescribed by the regulations

Notification is required by the Saleyards Supervisor immediately after a pollution incident becomes known. Any information required that is not known at the time the incident is notified, must be provided when it becomes known.

A Pollution Incident Reporting Form is attached in **Appendix A (PIRMP)**

4.5 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION 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 event of a pollution incident occurring all members of the public and other contractor's staff will be mustered to the Emergency Assembly point, 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 Saleyards Supervisor.

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with **Section 4.3**. Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken to respond to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site. Irrespective of whether the EPA directs the Council to notify the neighbours and depending on the circumstances of the particular pollution incident, the Council may at their own discretion voluntarily choose to notify neighbours. Notification and communication methods will be determined on a case by case basis and the following methods can be used;

- Phone Calls
- Media Releases (Radio/Newspaper/Internet , etc)
- Site visits/Door knocking
- Letter drops
- Warning Signs
- Other methods as the situation requires

4.6 INCIDENT INVESTIGATION

All emergencies must be investigated. For all other incidents, the Director Engineering & Technical Service (with guidance of Saleyard Supervisor) will decide whether an incident investigation will be conducted. When an incident investigation is required, the Director is responsible for, forming the investigation team and Co-ordinating the investigation.

IMPLEMENTATION

5.1 RESPONSIBILITY

The Director Engineering and Technical Services is responsible for the implementation of this plan.

5.2 STAFF TRAINING

All the staff members at the facility should be inducted and the induction must cover the purpose, requirements and responsibilities details in the PIRMP.

All staff should be received sufficient training to enable them to carry out their assigned duties in a complete and safe manner,

- Staff must be capable of identifying potential pollution incidents
- Staff must be familiar with the requirements and procedures contained within this PIRMP

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 is included in **Appendix A (PIRMP)** and must be kept on site and updated regularly.

5.3 REVIEW AND UPDATE PIRMP

The PIRMP is a living document required to be reviewed 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. Revised and updated versions of the PIRMP will always be issued with a summary of the changes. A register for updating and testing the PIRMP is included in **Appendix A (PIRMP)** and must be kept on site and updated regularly.