

**Pollution Incident Response
Management Plan
for
Dunmore Recycling and Waste Disposal Depot
(EPL 5984 Waste Facility)
Report June 2021**



Executive Summary

This Pollution Incident Response Management Plan (PIRMP) was developed for the Dunmore Recycling and Waste Disposal Depot (Depot), 44 Buckley's Road Dunmore NSW 2529, operating under Environmental Protection Licence 5984.

This document has been set out to fulfil the requirements of Part 5.7A of the "*Protection of the Environment Operations Act 1997*" and contains the details required for pollution incident response management plans as set out within Part 3A of the "*Protection of the Environment Operations (General) Regulation 2009*". The objectives of this plan is 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, WorkCover 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.

As the nature of this site is changing, this PIRMP is a working document, which requires changes to site conditions, operating procedures or licence requirements to be reviewed and incorporated where applicable.

Following is a summary of the immediate steps to be taken in the event of a pollution incident.

This document is reviewed after any incident and following the yearly simulation exercise. Refer to Table 1, "Table of Revisions"

Table 1. Table of Revisions

| Document Title | Date Issued | Author/Reviewer | Organisation | Details |
|---|-------------------|-----------------|---|--|
| 112034_PIRMP_V0 | 30 August 2012 | Daniel Robinson | Environmental Earth Sciences NSW | PIRMP |
| 112034_PIRMP_V1 | 31 August 2012 | Daniel Robinson | Environmental Earth Sciences NSW | Changes required by council. |
| 112034_PIRMP_V2 | 11 September 2012 | Daniel Robinson | Environmental Earth Sciences NSW | Addition of Flow chart and council changes |
| 112096_PIRMP-DRWDD EPL 5984 & 12903 V3 | 28 April 2015 | Nicole Cheung | Environmental Earth Sciences NSW | Reviewed by Shellharbour City Council Waste Services |
| 112097 PIRMP DRWDD EPL 5984 V4 | 30 August 2016 | Dianne Tierney | SCC Waste Services | Changes due to redevelopment and Testing of the PIRMP 3 August 2016 |
| 112097 PIRMP DRWDD EPL 5984 V5 | 4 December 2016 | Dianne Tierney | SCC Waste Services | Document review due to EPA incident report C124813-2016, 4 November 2016 |
| 112098 PIRMP DRWDD EPL 5984 | 25 May 2017 | Dianne Tierney | SCC Waste Planning & Operations | Document review due to testing of the PIRMP 23 May 2017 |
| 112099 PIRMP DRWDD EPL 5984 V1 | 20 July 2017 | Dianne Tierney | SCC Waste Planning & Operations | Document review due to change of UHF Channel 1 July 2017 |
| 112100 PIRMP DRWDD – Dunmore Landfill EPL 5984 | 29 June 2018 | Dianne Tierney | SCC Waste Planning & Operations | Document review due to testing of the Plan 1 June 2018 |
| 112101 PIRMP DRWDD – Dunmore Landfill EPL 5984 | 22 May 2019 | Joel Coulton | Shellharbour City Council Waste Planning and Operations | Document review due to testing of the Plan 22 nd May 2019. |
| PIRMP DRWDD – Dunmore Landfill EPL 5984 | 15 June 2020 | James Brumpton | Shellharbour City Council Waste Planning and Operations | Document review due to testing of the Plan 13 th May 2020. |
| PIRMP DRWDD – Dunmore Landfill EPL 5984 | 17 June 2021 | Shanin Neveling | Shellharbour City Council Waste Planning and Operations | Document review due to testing of the Plan 06 th June 2020. |
| | | | | |

Summary of Pollution Incident Response

| In the event of a pollution incident | | | Section of Report |
|--|---|--|-------------------|
| Step 1 | Contact Dunmore Landfill Operations Supervisor | Site Supervisor (0421 044 158) | Section 10 |
| Step 2 | Is there an immediate threat to human health and the environment? | Call emergency Services (000) or 112 for mobile phones | Section 10 |
| Step 3 | Does the site need to be evacuated? | Initiate evacuation procedure Safely follow pollution incident procedures | Section 8.2.6 |
| Step 4 | Depot Site Supervisor to contact Group Manager Asset Strategy and Waste and Resource Recovery Manager of Shellharbour City Council to inform them of the incident | Follow the pollution incident response management plan contacting the relevant authorities as required | Section 6 |
| Step 5 | Additional staff responsibilities | | Section 6 |
| Onsite Staff | Dunmore Landfill Operations Supervisor | Waste and Resource Recovery Manager – Shellharbour City Council | |
| Assist with Clean Up | Coordinate onsite plan | Call relevant regulatory authorities (EPA, Worksafe) following order specified in Table 8 | |
| Follow instructions of Depot Site Supervisor | Barricade off area and notify staff onsite | Engage appropriate consultants | |
| | Complete incident reporting form | Submit incident report form to EPA. | |
| | | Review PIRMP within 30 days of report. | |

It is recommended that all sections of this document are read, and the appropriate training undertaken, prior to responding to an incident.

The below Table specifies the order these contacts are to be called and who is responsible to contact them as required.

Contact Order

| Name/ Organisation | Role | Person responsible to call | 24 Hr Contact |
|---|--|----------------------------|---|
| Emergency Services: Fire and Rescue NSW, Ambulance, Police | First responders. They are responsible for controlling and containing incidents. Can be used to contact surrounding neighbours | Depot Site Supervisor | 000 or 112 for mobile phones |
| Waste Services Shellharbour City Council | Contact appropriate regulatory authorities, manage the response | Depot Site Supervisor | (02) 4221 6117, (02) 4221 6141 (02) 4221 6223, or 0468 495 017 |

| Name/ Organisation | Role | Person responsible to call | 24 Hr Contact |
|--|--|--|--|
| Environment Protection Authority | Regulatory authority under the POEO act for this licensed site | Depot Site Supervisor to report incident as soon as possible and provide Waste Planning the Incident Number. | 131 555 Select 1 or (02) 9995 5555 |
| Ministry of Health via Public Health Unit | In the event this could cause impact to the community and workers the Public health unit provides advice on the response | Waste Operations Manager | (02) 4221 6700 (Business hours) (02) 4222 5000 (After hours) ask for Public Health Officer on call |
| SafeWork NSW | To be contacted if this is a notifiable incident | Waste Operations Manager | 13 10 50 contact@safework.nsw.gov.au |
| ENRS or other environmental consultants | Environmental advice on possible monitoring places for surface water, ground water and storm water catchment information | Waste Operations Manager | 02 4448 5490 |

List of Contacts

| Name | Position | Role | Organisation | Contact |
|------------------------|-----------------------------------|--|---------------------------|----------------|
| Kerry Penfold | Depot Site Supervisor | Chief Warden, activating the plan and managing on site response. | Shellharbour City Council | 0421 044 158 |
| Sean Anderson | Plant Operator | WHS Rep | Shellharbour City Council | 0432 382 884 |
| Joel Coulton | Waste & Resource Recovery Manager | Managing the off-site response | Shellharbour City Council | 0468 495 017 |
| Shanin Neveling | Waste Operations Manager | Support Site Supervisor / 2IC to managing response | Shellharbour City Council | 0418 471 601 |
| Ryan Stirling | Contract Manager | Assisting the response and report to the EPA | Shellharbour City Council | (02) 4221 6117 |

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1. Introduction

The *Protection of the Environment Operations Act 1997* (POEO Act) specifies within Section 147 that there is a duty to report a pollution incident if there is a threat or material harm to the environment. A pollution incident is defined as:

“Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

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 POEO Act as:

- 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.

If a pollution incident occurs in the course of an activity at the premises so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying out the activity must immediately implement the pollution incident management response that was developed to meet the requirements of the POEO Act.

1.1 Legislative requirements

This pollution incident response management plan (PIRMP) for Dunmore Recycling Waste Disposal Depot is a document set out to fulfil the requirements of Part 5.7A of the *Protection of the Environment Operations Act* (POEO) and the *Protection of the Environment Operations (General) Regulation 2009* (POEO(G) Regulation). In summary, this provision requires the following: -

- All 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).
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (Section 153D, POEO Act).
- Licensees 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)

1.2 Site description and operations

The Dunmore Recycling and Waste Disposal Depot is located on Buckley's Road, Dunmore, 4 km south of Shellharbour (see Figure 14.1). The whole of site comprises of the Depot (EPL 5984). Located over Lot 21 in deposited plan (DP) 653009 (45.99Ha), Lot 1 in DP 419907 (8.66Ha). The site is owned and maintained by Shellharbour City Council.

Anecdotal evidence suggests Dunmore Recycling and Waste Disposal Depot is reported to have been established in 1945. Shellharbour City Council has managed the site since 1983. Putrescible and non-putrescible waste generated in the Municipality of Shellharbour is deposited at the Dunmore Recycling and Waste Disposal Depot.

Before the mid-1980s there was no control on the disposal locations or the types of waste disposed of at the landfill. In the mid-1980s the landfill operations became more controlled and present filling is confined to EPL 5984. Since Shellharbour City Council took over the operation of the Dunmore Recycling and Waste Disposal Depot, filling areas have been designated and regular daily cover applied.

A weighbridge and checkpoint station has been installed to inspect the type and amount of waste being disposed of.

Night soil and grease trap wastes were deposited along the eastern margin of the site (Figure 14.2), until around 1985. Some 600,000 litres of effluent were disposed of per week at the site during this time. The volume of night soil collected decreased from this time, with a sewage system being gradually connected with Shellharbour Municipality. No night soil/effluent was disposed of in this area after 1989.

It has been reported that ash material has been dumped at the landfill, supposedly spent dolomite from the Wollongong steel mill. The possibility that other industrial wastes may be present in the older parts of the landfill has not been discounted, due to the uncontrolled nature of dumping at the landfill up until the mid-1980s.

In 1983 an environmental impact statement (EIS) was prepared by Council for commencement of a sand dredging operation. This operation was put into effect in the latter half of 1993 and was located in the south west portion of the site. These works were undertaken by Davidson Dredging and ceased operation in 2015.

A larger scale sand mining operation was conducted on the land adjacent to the east of the Dunmore Waste Facility for many years. This operation ceased in March 2007 and is now used for pond filling.

A Site Management Plan (SMP) prepared by Golder Associates (June 2010) describes the typical operation of the landfill process. This is separated into various stages:

- vegetation and topsoil stripping (topsoil being used for landfill cover);
- surface sand extraction;
- shallow sand extraction;
- deep sand extraction;
- VENM backfilling;
- construction of a clay liner constituting compacted clay overlain with a geosynthetic clay liner and high density polyethylene liner;
- leachate collection system construction;
- solid waste landfilling;
- covering of waste;
- site capping and revegetation; and
- rehabilitation.

Shellharbour City Council

Waste Services Report June 2021

Dunmore Recycling & Waste Disposal Depot EPL 5984

The nature of the waste that Dunmore Recycling and Waste Disposal Depot accepts is:

- mixed municipal waste;
- commercial and industrial waste including asbestos;
- virgin excavated natural material (VENM);
- concrete, rock, brick and tile;
- construction and demolition waste; and
- green and wood waste.

This waste facility is subject to the conditions of Development Application (DA) numbers 55/1995 and 166/2009 and Environmental Protection Licences (EPL) 5984.

The key components of the operations on the EPL 5984 portion of the site include: -

- **Gas Flare** - Emissions from landfills consist mainly of the uncontrolled release of methane from decomposing organic material, such as food scraps, paper, garden waste and wood. Control measures implemented on site include capturing the gas and diverting it through controlled emission points where it can be combusted in a flare (with methane converted to less potent CO₂); with a future option for generating power.
- **Truck Wash/Maintenance Shed** – located along the main entrance road a truck wash with potable water supply and sedimentation dam is provided for cleaning soil and sedimentation from wheels prior to exiting from the site.
- **Leachate collection system**- Each landfill cell has a leachate collection system, extracting leachate from the bottom of the landfill via submersible pumps into a collection system. This material is primary treated and either transported off site to an aqueous waste plant or irrigated in areas that comply with EPL 5984 conditions.
- **Hard Waste Transfer Station** - located to the south west of the main entrance. As well as receiving mixed residual waste, the facility also processes a number of waste streams including garden organics, metals, mattresses, e-waste, batteries, oil (motor sump and cooking), polystyrene and cardboard;
- **Landfilling** - the majority of the site is utilised for depositing putrescible waste from the kerbside pick-ups to landfill. A number of areas have been historically utilised for land filling however filling in these areas have since been completed with the mounds grassed and vegetated. Active landfilling is currently being undertaken in Cell 5A and soon to progress in to Cell 5B;
- **Sand Extraction** - the site has historically been subject to sand extraction including along the western and southern site boundaries. The current area is subject to a licence under the Mining Act 1992 which includes a maximum of 50,000 tonnes per annum of sand to be extracted to be utilised for local developing projects. Currently there is no sand extraction occurring on site however, pond filling with rock is ongoing.

Each of the above facilities are supported by additional infrastructure including weighbridges, road networks, signage, truck wash facilities, sediment basin, telecommunications, power and water.

1.3 Surrounding land use

The Site Management Plan outlines the surrounding land use of the site and it is evident that the surrounding land is zoned for a variety of uses. Based on the *Shellharbour Local Environmental Plan 2000* and *Rural Local Environmental Plan 2004*, neighbouring land is zoned as 1(a) 'Rural' 'A', 5(a) 'Special uses', 5(b) 'Special uses (Railways)', 7(a) 'Environmental Protection (wetlands)' or 7(f2) 'Environmental Protection (foreshore)'.

The land use surrounding the site is summarised below.

Revolve Centre – (Tip Shop) located at the main entrance, on the northern part of the site. The centre is operated by Resource Recovery Australia, under a contract arrangement with Shellharbour City Council. The Revolve Centre lies outside EPL 5984 however, their obligations are included within the Plan. The centre accepts postconsumer recyclables and at the discretion of the operator, recovers goods and materials for re-sale. Goods include a wide variety of household items such as clothing, furniture, appliances, construction material and tools.

Shellharbour City Council in partnership with Resource Recovery Australia is running a trial program called the "Tinkerage". The "Tinkerage" is a fresh initiative for the Shellharbour Community. Everyone needs to think twice before throwing something out to landfill. Can it be fixed? Can it be repurposed? The Tinkerage is just the place to help in this process. You can buy something from the Revolve Tip Shop that needs a little loving care, drop by and learn how to upcycle or fix it.

The Tinkerage is open every Thursday and Friday from 10am to 3pm for tinkerers to drop by and use the space under the guidance and supervision of the workshop facilitator.

North of Site:

- Dunmore village with 20 houses along Shellharbour Road which are approximately 200 metres from site. A rural fire brigade is also located in the village;
- Integral Energy works depot to the north east;
- Shellharbour Links golf course 500 metres to the north of site; and
- Residential development to the north and north east.

South of site:

- SEPP 14 Wetlands on the south eastern boundary; and
- Minnamurra landfill 500 metres to the south of the site.

West of site:

- Sand extraction operation on Western side of state highway No. 1
- South coast train line and State Highway No. 1; and
- Blue Metal Industries quarry within 2 km of the site.

East of site:

- EPL 12903 – 200m Transfer Station and FOGO facility
- 500m Sand extraction and recovered aggregate recycling

2. Description and Likelihood of Hazards

2.1 Description of the licensed activity and hazards to human health and environment

The main hazards to human health or the environment associated with the activity being undertaken at the premises, the likelihood of any such hazards occurring, including details of any circumstances or events that could, or would, increase that likelihood.

Scheduled activities include:

- EPL 5984 – Composting, Extractive activities, Waste disposal (application to land), and Waste Storage. Waste processing (non- thermal treatment).

From these scheduled activities, the hazards to human health and the environment have been identified.

These include:

- water pollution (section 3.1);
- air pollution (section 3.2);
- pollution because of an unexpected material disposed on site (section 3.3).

Based on these activities, the severity of any pollution incident should be ranked based on the extent to which a pollution hazard poses a threat to humans and the environment (Refer to the below Table).

| Description of the pollution event | Severity score |
|---|----------------|
| Pollution could affect only those in the immediate vicinity | 1 |
| Pollution could affect others within the site | 2 |
| Pollution could affect surrounding neighbours | 3 |

Under licence conditions the site can accept and dispose of potential acid sulfate soil (PASS) material, however this practice is not undertaken. Acid sulfate soil has the potential to cause environmental damage if not managed properly and this PIRMP will need to be altered accordingly should these practices be undertaken.

The below Table identifies a list of foreseeable hazards that could occur on this site as a result of regular operating procedures.

| Type of Pollution | Hazard | Likelihood of hazard occurring | Consequence | Risk Score |
|--------------------------|--|--------------------------------|-------------|------------|
| Soil and Water pollution | Ground water pollution by migrating leachate | Possible | Moderate | 2 |
| | High sediment load into receiving waters | Unlikely | Minor | 4 |
| | Generation of excessive leachate | Unlikely | Minor | 4 |

| Type of Pollution | Hazard | Likelihood of hazard occurring | Consequence | Risk Score |
|----------------------------|---|--------------------------------|---------------|------------|
| | Overflow of leachate system | Possible | Moderate | 2 |
| | Runoff of surface water from disturbed parts of site carrying high sediment loads | Possible | Minor | 3 |
| | Soil and water pollution as a result of refuelling plant and equipment on site | Unlikely | Moderate | 3 |
| | Exposure to radiation caused by damage or malfunction of density gauge | Rare | Moderate | 3 |
| Air Pollution | Landfill gas levels above recommended guidelines | Possible | Minor | 3 |
| | Accumulation of landfill gas in confined space causing an asphyxiation hazard | Unlikely | Major | 2 |
| | Ignition of accumulated landfill gas | Rare | Major | 2 |
| | Excessive impurities, pathogens and/ or toxins admitted to the air | Rare | Minor | 5 |
| | Landfill fire resulting in the production of hazardous smoke | Rare | Minor | 5 |
| Unexpected findings | Discovery of orphan waste on site | Possible | Insignificant | 6 |
| | Uncontained asbestos in waste stream | Possible | Major | 1 |

Refer to the below Risk Management Table to score the risk associated with any particular hazard.

| Likelihood | Consequences | | | | |
|--|--|--|---|--|---|
| | Catastrophic Death, Permanent disabling injury or extensive permanent environmental damage | Major Extensive permanent injury or extensive temporary or minor permanent environmental damage | Moderate Significant non- permanent injury. Overnight hospitalisation. Temporary environmental damage, consultants required for assessment and clean-up | Minor Medical help needed. Treatment by medical professional. Environmental clean-up done in house | Insignificant Dealt with in house |
| Almost certain to occur in most circumstances | 1 | 1 | 1 | 2 | 2 |
| Likely to occur frequently | 1 | 1 | 2 | 2 | 3 |
| Possible and likely to occur at some time | 1 | 1 | 2 | 3 | 4 |
| Unlikely to occur but could happen | 1 | 2 | 3 | 4 | 5 |
| May occur but only in rare and exceptional circumstances | 2 | 2 | 3 | 5 | 6 |

3. Preventative and Incident Management

As a condition of Environmental Protection Licence 5984 the Dunmore Waste Facility is required to have in place controls that manage water and air pollution that may occur on site. These have been detailed in the Site Management Plan and are summarised below.

The pollution events that are most likely to occur are those associated with spills on site and extraordinary weather events that could cause overflow into surrounding areas. These should be contained immediately by staff and evaluated by the Depot Site Supervisor to determine the level of action necessary.

In the event that groundwater monitoring data reports results exceed the licence criteria or threshold limits, this data will be reported and published on the website. Where landfill gas has exceeded its trigger values, the EPA is required to be notified within 24 hours. Additional groundwater monitoring bores and dust monitoring were installed in early 2020.

Groundwater and landfill gas pollution events recorded as part of regular monitoring are not likely to be a discrete pollution event and cannot be mitigated with one off control measures. Monitoring results that exceed guidelines over a period of two or more rounds will need to be investigated and remedial options considered as outlined in the Site Management Plan.

Another pollution event that may occur is a landfill fire that may produce offensive or hazardous fumes. A regular landfill fire is controlled by staff workers using a water truck stored on site until emergency services arrive. Where smoke or fumes are of unknown nature, the fire is to be controlled by NSW Fire and Rescue.

3.1 Water pollution management

3.1.1 Leachate barrier and collection system

An operating condition of the site is to ensure that all cells created after 1 July 1998 have a leachate barrier and collection system on each surface used for the disposal of waste. The requirements of this barrier system are specified in the Site Management Plan.

The purpose of this barrier system is to provide a physical containment for leachate migration to prevent a pollution event of the groundwater or receiving water bodies.

A collection system is also in operation with the objective to collect and direct all leachate to a point for treatment and disposal either to sewer or by irrigation.

Current practice undertaken on all cells constructed after 1998 involves designing the cell to direct the leachate towards a sump. The sump pumps out leachate into four holding tanks through a float-controlled pump. Leachate is stored in these tanks and is primarily transported off site to an aqueous waste treatment plant and secondarily irrigated over select areas of the site that meet the EPL conditions related to irrigation or reinjected into a series of two risers.

3.1.2 Surface water and sediment

On the site, the surface water has been classified into two categories:

- leachate – any water that falls within the open tip face or daily cover areas;
- stormwater – runoff from areas that have intermediate cover or capped which is either directed to sediment ponds or the former sand mine pond (groundwater)

The objectives of the surface water controls are to:

- prevent unacceptable sediment loads in receiving waters;
- prevent any surface water mixing with waste;
- prevent erosion of cover material and/or waste; and
- avoid generation of excessive leachate.

Current practice to control surface water and sediment includes stormwater diversion drains and two sedimentation ponds, and managed in the following ways:

1. Stormwater considered leachate is kept within the active cell and managed as leachate;
2. Stormwater coming from adjoining land is intercepted by a well-vegetated drainage channel and directed into Rocklow Creek. Other clean surface water is diverted away from the active landfill towards the table drain to the east of site and directly to the culvert under the road and discharges offsite. This drainage channel is well vegetated. Stormwater is diverted away from active filling areas. Well-vegetated drainage channels direct this water to either of the two sedimentation ponds. Overflow from sedimentation pond one is diverted into the western diversion drain.

Erosion control methods to minimise erosion and sedimentation are used for all works where there is the potential for erosion to occur. The SMP specifies the following measures used on site:

- reducing the area of exposed soil including sand mining area and recently constructed cells;
- diverting clean water away from disturbed areas;
- reducing flow concentration by the construction of flow spreading bunds over recently capped areas;
- reducing the length and steepness of slopes;
- rehabilitating capped areas in a timely manner;
- applying sedimentary control measures to intercept and retain sediment on site. (e.g. sediment fences, hay bales, existing table drains around perimeter and sedimentation ponds); and
- inspection of maintenance and cleaning program for control structures to maintain capacity and integrity.

3.1.3 Leachate, groundwater and surface monitoring

A regular ground and surface water-monitoring program is required. Monitoring conditions are specified in Chapter 2, Section P1 “Location of monitoring/discharge points and areas”, Chapter 3, Section L2 “Concentration limits” and section Chapter 5, Section M1 “Monitoring records” of the licence.

Monitoring of the leachate is carried out on a quarterly basis to determine the properties of the leachate and access if this is suitable for the irrigation purposes.

Monitoring of the groundwater and surface water is undertaken on a quarterly basis to assess the quality of the groundwater and surface water and provide an early detection method for pollution resulting from landfill activities. Monitoring locations are provided on Figure 14.3.

3.1.4 Water pollution assessment program

If pollution is encountered during any monitoring event, an assessment and subsequent contingency plan had been detailed in the Site Management Plan and this document. The objective is to have procedures in place in the event that groundwater or surface water pollution is identified.

3.2 Air pollution management

Landfill gas is a by-product generated in the breakdown of waste in a landfill. EPL 5984 identifies the discharge to air and the setting of limits for the emission of pollutants to the air from the gas flare shown on Figure 14.4. Regular landfill gas monitoring of wells and odour observations are undertaken.

NSW EPA Environmental Guidelines Solid waste landfills 2016, recommends that landfill gas should be contained by a combination of the leachate barrier system, capping and revegetation and covering of waste. The general operation of this landfill satisfies this recommendation.

NSW EPA Environmental Guidelines for Solid waste landfills 2016 indicates that a concentration of 500 ppm v/v or 1% LEL is the threshold for potential action to be taken.

R4.3 Stipulates “The licensee must notify the EPA within 24 hours by telephoning the Environment Line service on 131 555 if any landfill gas monitoring required by this licence detects methane above 1% (v/v), and increase the frequency of monitoring to daily, until the EPA determines otherwise”.

3.3 Management of material to landfill

The licence specifies the material that is scheduled to be disposed of onsite and the activity that is allowed for each waste stream. The Site Management Plan details how this material is to be processed, monitored and regulated.

Preventative measures that are in place to prevent a pollution incident as a result of unscheduled material being dumped on site are:

- signage to indicate the types of waste allowed and those prohibited;
- entry via the weighbridge;
- customer declaration of waste;
- if industry waste or asbestos waste is to be disposed of, an application for disposal is submitted and assessed prior to the material being received; This application is assessed by the Depot Site Supervisor and the waste is inspected in-situ prior to transporting to waste facility. This ensures that any risk associated with exposure to asbestos is maintained by appropriately contained material.
- waste is screened at the weighbridge and CCTV is available to visually inspect loads;
- screening, separation and checking waste at tipping face;
- recording of all information and archived for at least four years;
- special waste to be immediately notified to the plant operator; and
- regular training of staff to supervise tipping and screening of waste.

3.4 Early warnings

In the event of a pollution incident those at the scene are to immediately contact the Depot Site Supervisor by mobile phone or UHF radio Channel 68.

The Depot Site Supervisor is to assess the situation and inform the staff at the weighbridge of instructions for staff and the public. The primary means of warning will be across UHF radio on Channel 68 and mobile telephone. Where evacuation procedures need to be initialised, the siren is to be switched on. The weighbridge will make the following announcement twice:

“Emergency, Emergency- The evacuation procedure for the Dunmore Landfill has been activated. Please proceed to assembly point located near the telecommunications tower”.

Ongoing information is going to be given from the Depot Site Supervisor over the UHF radio and also via the weighbridge. The weighbridge is the direct point of contact with the public and will be briefed about the status of the situation and the response to public and other staff members.

After the weighbridge operator completes the announcement, they are to grab the portable T-Way radio and proceed outside and stand in front of the incoming weighbridge to prevent unauthorised vehicle entry and direct emergency service vehicles as required.

Where a pollution event has the potential to have impact offsite, communication with surrounding neighbours will be undertaken. The decision to notify adjoining owners will be made by the Site Supervisor.

3.5 Updates

Updates to staff and the surrounding community will be required for all pollution incidents. Where monitoring values exceed guidelines, the monitoring data will be presented on Council's waste website, www.shellharbourwaste.com.au

Monitoring data is required to be presented to the EPA in the form of an annual return as set out in the Environmental Protection Licence. Additional updates to the EPA will be directly requested and provided by Waste Services at Shellharbour City Council.

POEO Act 1997 requires that all monitoring data is to be published within 14 days of obtaining the data. This is published on www.shellharbourwaste.com.au

In the event that a pollution incident occurs on site requires immediate attention in the form of clean-up and containment and/or evacuation, the early response by the Depot Site Supervisor is to assess the risk associated with the incident and initiate the incident response. When the initial pollution has been stabilised by reducing the immediate threat to human health and the environment, updates are required to be made until the pollution incident has been rectified. Onsite updates will be made by the Depot Site Supervisor and will include:

- communication over UHF Channel 68 to workers on the site;
- briefing the weighbridge operator on the status of the incident and instructing them on the response to calls and queries from the public;
- signage upon entry to the site to the status of the landfill (closed or open);
- regular phone updates to the Group Manager-Asset Strategy; and
- regular updates by phone to onsite contractors who do not have access to UHF radio.

The information that is required to be conveyed in these updates will include:

- the status of the area or site - Is it open or restricted;
- the area where the incident has occurred;
- the hazard that is present;
- what is being done to rectify this incident;
- when the next update occurs; and any additional safety requirements required by staff working near or around the area

4. Inventory of Pollutants

The main potential pollutants associated with this site are generated as a result of historical and current land filling activities. These include:

- Leachate, including 4 x 46kL tanks; and
- landfill gas.

These two pollutants are unable to be quantified in terms of volume or locality however, the current monitoring data and groundwater contours, indicate potential leachate migration pathways on this site. Figure 14.3 shows the groundwater contours and Figure 14.4 presents the location of landfill gas monitoring.

Additional goods that are stored on site include:

- domestic quantities of cleaning products;
- asbestos bin;
- 12,000L diesel fuel tank;
- 12L petrol and diesel containers;
- Posi-Shell material for daily cover

For all chemicals stored on site, a Safety Data Sheet (SDS) is stored in the site office and can be accessed by all staff. In addition, a dangerous goods register and hazard assessment is conducted in line with the Shellharbour City Council operational procedures. Figure 14.5 shows the location of these potential pollutants on site.

5. Safety Equipment

5.1 Personal Protective Equipment

A site risk assessment has been prepared by Shellharbour City Council (risk assessment 10660).

Personal protective equipment (PPE) has been identified in this document and the location of stores on site include the main weighbridge, maintenance shed and in the shipping container located to the rear of the site.

Staff members are issued with PPE that includes leather gloves, protective eyewear and steel toe footwear. Additional safety equipment for designated tasks is located in the storage areas above. These include and are not restricted to:

- long and short PVC chemical resistant gloves;
- leather gloves;
- Ty-vek cover-alls ;
- safety goggles;
- gumboots;
- ear defenders; and
- P2 class face masks.

6. Contact Details

The below table presents the list of contacts in the case of a pollution incident. The Depot Site Supervisor, Landfill Operations Manager and Waste Services Manager must be contacted in the case of any pollution incident as soon as practical and prior to the close of business. Section 10 of this plan outlines in detail the actions immediately to be taken in the event of an incident.

List of Contacts

| Name | Position | Role | Organisation | Contact |
|-------------------------------------|--|--|--|--|
| Kerry Penfold | Depot Site Supervisor | Chief Warden, activating the plan and managing on site response. | Shellharbour City Council | 0421 044 158 |
| Sean Anderson | Plant Operator | WHS Rep | Shellharbour City Council | 0432 382 884 |
| Joel Coulton | Waste Services Manager | Managing the off-site response | Shellharbour City Council | 0468495017 |
| Shanin Neveling | Waste Operations Manager | Support Site Supervisor / 2IC to managing response | Shellharbour City Council | 0418471601 |
| Ryan Stirling | Contract Manager | Assisting the response and report to the EPA | Shellharbour City Council | (02) 4221 6117 |
| NSW Fire and Rescue | - | Emergency Response | - | 000 or 112 for mobile phones (02) 4224 2000 |
| Police | - | Emergency Response | - | 000 or 112 for mobile phones (02) 4295 2699 |
| Ambulance | - | Emergency Response | - | 000 or 112 for mobile phones 131 233 |
| EPA Hotline | Depot Site Supervisor | Incident reporting | NSW EPA | 131 555 or (02) 9995 5555 |
| SafeWork NSW | To be contacted if this is a notifiable incident | Incident reporting | SafeWork NSW | 13 10 50 or contact@safework.nsw.gov.au |
| Environmental Earth Sciences | Matthew Rendell Matthew Narracott Loretta Visintin | Environmental Advice | Environmental Earth Sciences | (02) 9922 1777 +61 488 339 151 |
| Public Health Unit | Public Health Officer | Surveillance and public health response | NSW Health (from Wollongong Hospital) | (02) 4221 6700 (Business hours) (02) 4222 5000 (After hours) ask for Public Health Officer on call |

The below Table specifies the order these contacts are to be called and who is responsible to contact them as required.

Contact Order

| Name/ Organisation | Role | Person responsible to call | 24 Hr Contact |
|---|--|--|--|
| Emergency Services: Fire and Rescue NSW, Ambulance, Police | First responders. They are responsible for controlling and containing incidents. Can be used to contact surrounding neighbours | Depot Site Supervisor | 000 or 112 for mobile phones |
| Waste Services Shellharbour City Council | Contact appropriate regulatory authorities, manage the response | Depot Site Supervisor | (02) 4221 6117, (02) 4221 6141 (02) 4221 6223, or 0468 495 017 |
| Environment Protection Authority | Regulatory authority under the POEO act for this licensed site | Depot Site Supervisor to report incident as soon as possible and provide Waste Planning the Incident Number. | 131 555 Select 1 or (02) 9995 5555 |
| Ministry of Health via Public Health Unit | In the event this could cause impact to the community and workers the Public health unit provides advice on the response | Waste Operations Manager | (02) 4221 6700 (Business hours) (02) 4222 5000 (After hours) ask for Public Health Officer on call |
| SafeWork NSW | To be contacted if this is a notifiable incident | Waste Operations Manager | 13 10 50 contact@safework.nsw.gov.au |
| ENRS or other environmental consultants | Environmental advice on possible monitoring places for surface water, ground water and storm water catchment information | Waste Operations Manager | 02 4448 5490 |

7. Communication

Communication between Dunmore Recycling and Waste Disposal Depot and the community will be through updates on the website located at:

www.shellharbourwaste.com.au This website displays quarterly environmental monitoring information under "e-library" tab.

Community concerns can also be made in the "contact us" email feedback section. More urgent queries can be made by directly calling Waste Planning at Shellharbour Civic Centre, Shellharbour City Centre on (02) 4221 6111.

When a pollution event occurs, the severity of the event will be established by the Depot Site Supervisor and reported to Waste Planning as licensee of the site. The following procedures for communications are as follows:

- **severity 3 pollution event** – neighbours, surrounding businesses and workers notified;
- **severity 2 pollution event** - workers notified as per protocols; and
- **severity 1 pollution event** - workers notified as per protocols and the area cordoned off.

The proximity of neighbours is outlined in Figure 14.1 and described in Section 1.3.

Based on the nature of pollutants at this site, it is unforeseeable that a pollution event on this site could occur that would pose an immediate threat to the surrounding neighbours. In the event that one does occur, the following will be undertaken to inform the identified neighbours:

- NSW Fire and Rescue will be utilised to doorknock residents of Dunmore Village;
- In the event that NSW Fire and Rescue cannot inform the local residents, they will be door knocked by the Waste Planning and Operations staff or a Council representative and informed of the incident; and
- In the event a resident is not home, a concise note with detailed information will be left on the door. This will include the nature of the hazard to the resident, any action the neighbour is to take and the contact number to call for regular updates.

The below Table presents the businesses operating in the vicinity of Dunmore Recycling and Waste Disposal Depot. These will be contacted in the event a pollution incident.

| Business Name | Location | Phone Number |
|--|-------------------------------|--|
| Revolve Centre: Resource Recovery Australia Matthew Curtis Southern NSW/ACT Regional Manager. | East of site | (02) 4237 5193 (shop) 0407 898 246 |
| Endeavour Energy Shellharbour Works Depot 7 Buckley's Road Dunmore | North East of Site | Emergency 131 003 |
| Dunmore Resources and Recycling Glenn Steggles 57 Buckley's Road Dunmore | East of site | (02) 4237 5033 |
| The Links Shell Cove (Golf Course) Corner of Southern Cross Boulevard & Shellharbour Rd Shell Cove | 500m North East of site | (02) 4237 5955 6am-6pm |
| Minnamurra Waste & Recycling Centre. Kiama Council, 446 Riverside Drive Minnamurra | 500m to the south of the site | (02) 4237 5148 8am-4pm |

8. Minimising harm to persons on the premises

8.1 Persons likely to be onsite

Persons likely to be on site are:

- employees of Dunmore Recycling and Waste Disposal Facility;
- employees of Shellharbour City Council Works Depot or Administration office;
- contractors e.g. Resource Recovery Australia, Flagstaff, Landfill Gas Industries.
- subcontractors working on site e.g. Environmental Earth Sciences, electricians and plumbers; and
- general public.

The site is open to the public during the hours of:

- 7.30 am - 4.00 pm on weekdays;
- 8.00 am - 4.00 pm on weekends and public holidays; and
- closed Christmas Day and Good Friday.

Staff will generally be situated around the site within 30 minutes of the opening and closing times. During this time the weighbridge records all vehicles/visitors in and out of the facility with specific areas designated for public disposal of waste. Visitors are required to provide a mobile contact number whilst onsite and have a CB radio turned to Channel 68.

Subcontractors are required to be inducted onto the site. They are required to sign-in and out at the weighbridge. As part of their induction, the Depot Site Supervisor is required to sight their safe work method statement (SWMS) for the work they are conducting.

8.2 Measures used to minimise harm to persons on the premises

Minimising harm to persons on the premises is conducted through:

- training;
- signage;
- personal protective equipment;
- administrative procedures; and
- engineering controls.

8.2.1 Training

Staff training is an important measure used to minimise harm to persons on the premises. Practices and procedures can be reinforced to those working on site and updates communicated. Details of staff training are specified in Section 11 of this plan.

8.2.2 Signage

Personal safety and graphic warning signs are used to inform Non-English speaking people who visit the site. These also include pedestrian marking to indicate safe walking areas within the site.

8.2.3 Personal Protective Equipment

Personal protective equipment has been detailed in Section 5.1 of this plan. Shellharbour City Council requires a risk assessment be undertaken for all tasks conducted. This assessment specified the required PPE for the job. Risk assessment

10660 has been undertaken on this site and the report is located in the office of the Depot Site Supervisor.

8.2.4 Administrative Procedures

Administrative procedures in place to minimise harm to persons onsite are systems that are followed by staff at Dunmore Waste Facility. These are located in the Depot Site Supervisor's office. These are detailed in the Site Management Plan and employee requirements of Shellharbour City Council. Procedures most relevant to this site include:

- inductions for all staff members;
- risk assessments undertaken for work on site;
- daily reports completed by the Depot Site Supervisor;
- measurement and recording of wastes received;
- replacement of signage across the site;
- dangerous goods register; and
- asbestos Policy and Procedures.
- Safety Data Sheets (SDS)

These procedures are in place to inform staff of the hazards on site and the different mechanisms to control materials entering the site and those operating on the site.

8.2.5 Engineering solutions

Engineered solutions to isolate and control the hazards that are in place on site to mitigate harm to persons on site include:

- the leachate pump and ponds to manage leachate from the landfill;
- drainage lines designed to divert surface water away from the landfill;
- sedimentation ponds to manage surface water sediment loads and retain sediment on site;
- waste oil disposal sumps which is collected;
- two safety showers – one in the weighbridge, the other near the Transfer Station at the waste oil collection point;
- isolated areas for retrieved gas bottles, battery storage and fluoro tubes; and
- fire extinguishers located in each workplace and near fuel storage areas.

8.2.6 Evacuation Procedure

An evacuation procedure is in place in the event that the Depot Site Supervisor needs to muster all staff offsite to control an incident that has the potential to cause harm to human health on site. The Depot Site Supervisor and/or the Waste Operations Manager are to assess the extent of the incident and initiate the procedure where there is a risk to persons on site.

NOTE: 000 is the first contact for an emergency as the primary responders to an incident that poses an immediate threat to human health. Section 10 details the procedure for action during a pollution incident.

Duties

The primary role of the duty wardens is to ensure, as far as practicable, the safety of the occupants and the orderly evacuation from the danger zone to the muster point.

Chief Warden

This position assumes control of the occupants of the entire site from the time that an incident occurs until the arrival of relevant emergency services. The Chief Warden on

site is to be the Depot Site Supervisor or person appointed to this position in their absence.

Warden

Appointed to a particular work area to facilitate the evacuation and communicate instructions from the Chief Warden. Wardens are required to know who is working in their area and the safe passage to the emergency muster point. Wardens will be the most senior staff member for a particular work group and will be addressed during the toolbox talk each morning.

Evacuation Procedure

When the evacuation procedure has been initiated:

- The Chief Warden (Depot Site Supervisor) is to switch on the siren located in the weighbridge. The siren is to be left on until the risk has been mitigated and switched off by the Depot Site Supervisor;
- Over UHF 68, the Depot Site Supervisor is to contact wardens and broadcast over this radio channel that an evacuation procedure has been initiated;
- If members of the public, contractors or subcontractors are present, the warden is to communicate to any public that an evacuation procedure has been initiated and they will be escorted to the emergency muster point by a staff member in the area;
- Wardens are to ensure all staff in their area have safely shutdown and isolated their machinery and direct staff to the emergency muster point;
- The wardens are to walk around their work area and ensure everyone has left their area;
- At the assembly point the wardens are to account for all staff members and signed in visitors and await instructions from the chief warden; and
- Once emergency response staff have been called, the Chief Warden is to assess the situation and if the risk has been mitigated determine if it is okay to return to work or to direct staff to leave the premises.

8.2.7 Muster Points and Alarms

The muster point for this site is to the west of the weighbridge below the telecommunications tower. In the event that this site is unsafe, the Chief Warden will announce a new muster point based on site conditions.

An audible alarm is located to the north west of the site near the muster point. This can be heard across the site. The control switch for the alarm is located in the main weighbridge near the site offices.

8.2.8 Contact details for available consultants

In the event that a consultant is required at short notice for a pollution incident the following contacts are available.

If a hazardous waste contractor is required one will be appointed by a Technical Officer from Waste Services. Waste disposal and spill containment services operate 24 hours.

These numbers do not replace the need to report to the appropriate regulatory authority or call emergency services if there is immediate threat to persons and the environment.

Contact details for available consultants.

| Consultant | Role | Contact Number |
|--|---|---|
| ENRS | Environmental Consulting and monitoring of ground water bores, surface water, leachate, gas and dust monitoring | (02) 4448 5490 |
| Public Health Unit | Surveillance and public health response. Medical and toxicological advice. | 4221 6700 (Business hours) 4222 5000 (After hours) ask for Public Health Officer on call |
| Chinnock Plumbing Services Ivan Chinnock | Plumber for internal services including potable water, onsite sewage system and leachate | 0408 423 725, 4296 1897 |
| Sydney Water | Plumbing to the street junction | Report a fault 132090 Questions 132092 Connections 1300082746 (Mon-Fri) |
| Endeavour Energy | Power outage/restore power to site | Emergency 131003 Enquiries 133718/131081 Dial before you dig 1100 |
| Graham Jurd Electrical Graham Jurd - | Power installation and repairs inside the site. | 0418 603 259, 4256 6535 |
| LGI Landfill Gas Industries Operations Manager 1 / 7 Gardens Dr, Willawong QLD 4110 | Landfill gas installation and monthly monitors of flare and vertical and horizontal gas lines | Tel: +61 7 3211 2225 Mob: +61 407 856 246 mark.harper@lfgas.com.au http://lfgas.com.au |

9. Attachments

Maps, documents are figures located at the end of this document. Brief description is outlined below.

1. Site Boundaries
2. Historical Filling on Site
3. Groundwater Contours
4. Landfill Gas Monitoring Locations
5. Pollutants Onsite
6. Drainage and Surface Water Flow Direction
7. Site Map and Evacuation Muster Point
8. Incident Report Form
9. Incident Investigation Report
10. Workcover NSW Incident Notification Fact Sheet
11. Toolbox Meeting Record
12. Training Register

10. Actions during and after incident or pollution event

10.1 Actions during and after incident a pollution incident

The following information details the action to be taken during and after a pollution incident. Following this, additional information has been included based on site specific hazards.

In the event of a pollution incident:

- the first person at the pollution incident, where safe to do so, will initiate a response to ensure any immediate threat to human health and environment is reduced. This will include, and not be limited to, removing surrounding people from the danger area:
- the first person is to ensure all members of the public in the immediate area removed from any potential danger and asked to proceed to the weighbridge;
- the first person will contact the Depot Site Supervisor to initiate the response. The Depot Site Supervisor is responsible for managing the response on site:
- the Depot Site Supervisor is responsible for documenting the incident. A hazard and incident reporting form (Appendix 15.1) is required to be completed for each incident; and
- the nature of the incident should be established to whether it is a chemical spill, fire or other;
- the Depot Site Supervisor will call the emergency response authorities (Fire and Rescue, Ambulance, Police) if required;
- the primary person at the site of the incident, where safe to do so, will initiate spill containment measures appropriate to the pollutant at the instruction of the works depot supervisor. Information on the chemical/pollutant will be found the SDS located at the site office and the risk assessment for the appropriate task:
- in the event that it is unsafe to do so, the staff member will be directed to move a safe distance away from the area and prevent others from entering the area until the Depot Site Supervisor directs advises otherwise;
- the Depot Site Supervisor will call the Waste Planning Team Leader and assess the risk based on the pollutant and the severity score;
- the Waste Planning Team Leader will contact the Group Manager Asset Strategy. If the Group Manager Asset Strategy cannot be contacted, the Waste Planning Team Leader will directly call the Director of Amenity and Assets;
- the Waste Planning Team Leader is required to contact the appropriate authorities, dependant on the nature of the incident, as specified in Section 6:
- Appendix B presents a fact sheet on when to notify SafeWork NSW;
- if the **severity score is 1**, it is a localised low risk incident. The Depot Site Supervisor is to assign appropriately trained staff or contractors to combat the incident. The area is to be cordoned off with hi-visibility markers and signage:
 - a) the Depot Site Supervisor will inform staff over the UHF Channel 68 on the incident if required; and
 - b) the Depot Site Supervisor is to brief the weighbridge operator to inform the public not to enter the area and provide information to staff if required;

- if the **severity score is 2**, the incident requires site evacuation. The Depot Site Supervisor is to turn on the siren and announce over UHF Channel 68 that an evacuation procedure is in place and to assemble at the emergency assembly point:
 - a) Wardens of the different work areas are to follow the evacuation procedure directing public and staff to the muster point;
 - b) the Chief Warden (Depot Site Supervisor) will ensure no one is left on site and will provide directions as informed by the emergency response crews and Waste Planning;
 - c) the landfill is to be closed and signage used to restrict public entry to the area; and
 - d) where safe to do so, a weighbridge operator will be directed to return to the weighbridge by the Depot Site Supervisor to restrict the entry to site and provide information to any queries from neighbours.
- where the **severity score is 3**, the incident requires site evacuation and surrounding community consultation:
 - a) the Depot Site Supervisor is to initiate the evacuation procedure on site;
 - b) Wardens of the different work areas are to follow the evacuation procedure directing public and staff to the muster point;
 - c) once at the muster point, on directions from the Waste Planning officers and Works Supervisor, a staff member will be directed to door knock the appropriate neighbouring residences with the potential to be exposed to the pollution incident; and
 - d) where safe to do so, a weighbridge operator will be directed to return to the weighbridge by the Depot Site Supervisor to restrict the entry to site and provide information to any queries from neighbours
 - e) once emergency services have the incident under control, access to site will be at the direction of the Waste Management Officer and the Depot Site Supervisor.

10.1.1 Chemical Spills

There is the potential for a chemical spill to occur on this site in the form of leaking or ruptured fuel tanks, and other chemicals that are used onsite

The following points should be undertaken in conjunction with the actions to be taken for any pollution event listed above. These points should only be conducted if the area is safe to do so:

- identify the type of incident and chemical involved. The chemical should be detailed on the dangerous goods register onsite;
- determine if the spill can be safely contained by staff on site and that it will not enter any drains;
- where no immediate safety hazard exists read the SDS for the spill clean-up information;
- machinery on site will be utilised to clean up spills and sand/clay will be used from the site to prevent liquid migration into drainage lines;
- if the **spill occurs on an unsealed surface**, initial response will be to stop the leak. The Safety Data Sheets (SDS) should be read for safe handling of the chemical and no open sources of ignition should be in the area:

- a) an excavator or bulldozer will be used to move the contaminated soil into a bunded stockpile and where practical move to a sealed surface. If a sealed surface is not possible, medium density polyethylene (MDPE) sheets will be laid out on the ground and the soil stockpiled on this. All stockpiles will be covered with MDPE; and
- b) the soil will need to be tested to determine if the material is suitable for disposal on site or offsite; and
- c) a 24hr hazardous waste contractor may be called to dispose of the chemical waste.

10.1.2 Fires

Fires in landfills are common and can occur due to high ambient air temperatures and combustible materials in the landfill. Licence conditions specify that the licensee must take all necessary steps to extinguish all fires burning as soon as possible. The operational procedures in the SMP details fire management protocols. A fire is considered an incident and will need to be reported to the EPA as specified in the site management plan.

In the event a fire is to occur in the landfill, the safety of persons in the area is of primary importance and should be assessed prior to combating an incident. Emergency services should be contacted where there is any risk to the health and safety of workers. Evacuation and incident procedures detailed in Section 10.1.

The following points should be noted for a fire incident:

- the Depot Site Supervisor will immediately contact emergency services and the local Dunmore fire brigade;
- a fire should always be approached from the upwind side to prevent exposure to smoke and potentially hazardous fumes;
- determine the source of fire. Check the area for surrounding hazards such as fuel or other flammable liquids. Where safe to do so, remove these from the area;
- in the case of a fire, one truck mounted water tanker and two 500L mobile units can be utilised for firefighting;
- all plant on site must have an appropriate fire extinguisher. Extinguishers are also located at each weighbridge; and
- the fire needs to be documented for incident reporting. This should include;
 - a) time, date and location of any fire ignited or reported at the site;
 - b) prevailing weather conditions and observations regarding smoke directions and dispersion; and
 - c) time and date the fire was extinguished

10.1.3 Landfill gas

In the event that regular monitoring detects a landfill gas exceedance, the information recorded in the Table below is a guide to manage this pollution incident.

Quarterly monitoring points as per EPL licence conditions.

Air

| EPA identification no. | Type of Monitoring Point | Type of Discharge Point | Location Description |
|------------------------|--|--|---|
| 12 | Landfill Gas Monitoring | | Above areas where intermediate or final cover has been placed |
| 13 | Landfill Gas Monitoring | | Inside all buildings within 250 metres of deposited waste |
| 14 | Discharge to air Air emissions monitoring | Discharge to air Air emissions monitoring | Landfill Gas Flare as shown on Drawing No. M7494-02-E1, dated 15 October 2015 (EPA Reference DOC15/415378). |

The Environmental Guidelines Solid Waste Landfills second edition, 2016 landfill gas surface emissions required outcomes include: -

- Minimise emissions of untreated landfill gas to air and through sub-surface strata and services.
- Minimise greenhouse gas emissions (methane, the major bulk component of landfill gas, is 20 to 25 times more potent than carbon dioxide)
- Minimise emissions of offensive odour
- Minimise the explosive risk to humans from gas build-up in confined spaces
- Ensure that, wherever feasible, landfill gas is sustainably utilised for energy recovery.
- Minimise emissions of air pollutants from the combustion of landfill gas in flaring or electricity-generating equipment.

Landfill gas is contained by installing low-permeability engineered barriers on cell floors and walls and in final capping.

A network of wells, drainage layers, pipework, and an extraction system installed within the putrescible waste cells collects landfill gas.

A landfill gas monitoring procedure has been established to demonstrate the achievement of these outcomes.

The threshold level for further investigation and corrective action is 500 parts per million or v/v (volume/volume) of methane at any point on the landfill surface for intermediate and finally capped areas.

Gas accumulation monitoring in enclosed structure is undertaken quarterly. The threshold level for further investigation and corrective action is detection of methane at concentrations above 1% v/v. This includes all buildings and other enclosed structures within 250 metres of deposited waste or leachate storage. If methane is detected at concentrations above 1% v/v or 500 ppm the occupier must notify the EPA within 24 hours. Within 14 days of this notification, the occupier must submit a plan to the EPA for further investigation and/or remediation of the elevated gas levels. Depending on the circumstances, this plan may include:

- Daily testing of the building or enclosed structure until ventilation or other measures have been put in place to eliminate the methane build up.
- Installation or adjustment of source and receptor landfill gas controls
- Further sub-surface monitoring to delineate any potential migration of landfill gas.

| CH ₄ concentration | Location | Action to be taken by person undertaking monitoring | Action to be taken by Waste Operations | Action to be taken by Waste Planning |
|-------------------------------|--|---|--|---|
| 500ppm (1% v/v) | Monitoring wells on site | Inform Waste Planning. Closer investigation and potential action is required. Review monitoring frequency and prepare for additional monitoring measures. | Repair or replace cover material and/or adjusting or installing gas extraction equipment. | Report readings and corrective actions to waste.operations@epa.nsw.gov.au |
| | At the surface of the landfill after intermediate or final cover | Inform Waste Planning Closer investigation and potential action is required. | Repair or replace cover material and/or adjusting or installing gas extraction equipment. | Review monitoring frequency and prepare for additional monitoring measures. Report readings and corrective actions to waste.operations@epa.nsw.gov.au |
| | In buildings or services on site | Inform Waste Planning Receive instruction to inform site occupant and follow evacuation procedure. | Initiate evacuation procedure of building. Inform relevant stakeholders Implement safe working procedures (i.e. stop working until gas dissipates) | Review monitoring frequency and prepare for additional monitoring measures. Inform EPA and other relevant stakeholders of gas concentration and that evacuation procedure has been implemented |

10.2 Spill containment equipment

Plant equipment is made available to manage and contain the foreseeable pollution spills on site. In the event of a spill, onsite plant equipment will be used to move soil to bund and prevent the pollutant moving into the drains or waterways.

The sedimentation ponds will be the collecting point for any surface drainage that occurs outside the active landfill. If required these can be pumped out if they are grossly impacted in a pollution event.

A spill kit is recommended to be kept at the weighbridge to manage small chemical spills that may occur around the office and weighbridge area.

10.3 Shutdown of processes/equipment

Plant and machinery is operated by suitably trained personnel. In the event that staff need to leave their equipment as a result of a pollution incident the following measures will need to be undertaken to ensure the machinery is shut down and left correctly:

- move the machinery to a position where there is no risk to the operator or others on site. Following directions of the Depot Site Supervisor;
- follow shut down procedures appropriate for the equipment; and

- if the machinery is going to elevate or increase the risk associated with the incident, the Depot Site Supervisor is to be contacted and an alternative area nominated for shut down.

10.4 Clean-up procedures

When a pollution incident has been stabilised and any immediate threat to human health and the environment has been mitigated clean-up will be required of the material. The SDS for each chemical provides clean-up instructions for stored chemicals on site.

Although this site is a landfill, licence conditions specify the type of waste allowed to be accepted. If the material is not permissible to be disposed of on site, it is to be disposed of by a suitably qualified contractor licensed to handle the material.

Waste Planning as the licence holder will be responsible for arranging for the disposal of this waste. Appropriate waste handling contractors may be engaged to collect and remove solid waste and also pump out liquid waste that may have collected in the sedimentation ponds as a result of pollution to the drainage system.

11. Staff Training

The objectives of the training that is to accompany this plan is to ensure all staff members on site are aware of the hazards in the workplace and the contents of the PIRMP such that they know of their responsibilities in the event of a pollution incident.

There are four elements that make up how training is undertaken at the Dunmore Waste Facility. These are outlined in the site management plan and include:

- position competency requirements;
- general induction training;
- site specific induction training; and
- ongoing training.

The SMP details the specific competency requirements for each position. All training and inductions are required to be recorded in an onsite register that is available in the SMP.

11.1 Inductions

The general induction is specified by the corporate policy of Shellharbour City Council and is relevant to the position of the employee. This general training also incorporates the WHS requirements for the relevant position. Contractor personnel are required to undertake this WHS training.

Site specific induction training is a requirement of all landfill staff and is to be delivered by the Depot Site Supervisor. This training will be specific to the individual role of the staff member and will require a detailed review and acceptance of these documented procedures. The specific induction is to include but not be limited to:

- safety and operating procedures and the correct identification of hazardous waste;
- operation of earthworks and compaction equipment;
- gas testing, water testing and water sampling;
- identification of wastes;
- accurate data recording; and
- pollution incident response management plan.

A training register is to be kept onsite and updated when a staff member undertakes training. This form is included in Appendix 15.5.

11.2 Ongoing training

A review of ongoing training requirements should be conducted on an annual basis and established based on but not limited to:

- changes in procedures;
- changes in regulations;
- changes in equipment;
- errors or deficiencies in job performance; and
- errors in data reporting.

Hazard identification and safe work method statements are required when any new task is to be undertaken on site. This is to be reviewed by staff undertaking that task and will be need to be included in the training register.

Types of ongoing training that may be required for a specific duty may include:

- First Aid Training;
- Chemical Handling Training;
- Training in use of fire extinguishers/ fire management;
- High Risk Work Training; and
- Workplace Health and Safety Training.

11.3 Other Training

11.3.1 Daily toolbox talks

A toolbox talk is a brief discussion to be undertaken daily by the Depot Site Supervisor. This is to be undertaken each morning prior to the start of work.

The objectives of the toolbox talk are to conduct a regular safety discussion relevant to the specific work being undertaken that day. A toolbox talk register will be completed (Appendix 15.4) this will include:

- description of works to be conducted that day;
- health and safety issues;
- environmental issues; and
- procedural/general issues.

11.3.2 Simulated exercises

A simulated test of this PIRMP is to undertaken annually. The objective of this exercise is to test the effectiveness of the plan and provide an interactive training exercise for staff.

Waste Services is responsible for ensuring these exercises are undertaken. The planning of this exercise is to be undertaken by the Waste Operations Manager and the Depot Site Supervisor.

The goal of this exercise is to provide a situation that is reflective of an incident that may be encountered on site. Safety is paramount for this exercise and no actual hazard should be conducted (such as the lighting of a fire) these will include:

- Spill; or
- Fire.

Requirements of these exercises are to:

- inform those on site that a simulation will be taking place that day;
- inform the public that a simulation will be taking place at the weighbridge and on the website. Specify the time and the date;
- at the toolbox talk on the morning of the simulation, the works coordinator will refresh the staff on the PIRMP and inform them that the simulation will occur that day;
- designate a location on site for the incident to occur;
- define the incident. This will include a pollutant common to site, volume or size of the pollutant, the people involved;
- activate the evacuation procedure and muster all staff to the assembly point; and
- allocate an officer for auditing/supervising this simulation (this should be an officer who is not responsible for the activation of the plan, e.g. Council's WHS officer or a representative of Waste Planning).

The expected outcomes of these exercises are:

- instruct staff on how to implement this plan;
- contain and manage an incident relative to the site;
- initiate an evacuation;
- document an incident;
- ensure all reporting paperwork is filled and the relevant authorities contacted (only call internal staff and indicate this is part of a simulation. Do not call external authorities); and
- provide feedback to all staff. Where there are non-compliances with the plan, this can be used to refine the PIRMP and provide further training if required.

11.3.3 Frequency of training

The following table indicates the frequency and location of each type of training on site.

| Training type | Frequency | Reporting Requirement | How records are kept |
|--------------------------------|----------------------------|---|---|
| General Induction | Commencement of employment | Signed on to the induction record | With the employment records of staff at Shellharbour city Council |
| Site Specific Induction | Commencement of employment | Understanding and sign on to the induction record | Induction records to be onsite and a copy sent to Shellharbour city council human resources |
| Toolbox talks | Daily | Daily toolbox form completed | Kept in the site office |

| Training type | Frequency | Reporting Requirement | How records are kept |
|------------------------------------|--|---------------------------------------|--|
| Other job specific training | <ul style="list-style-type: none"> On a needs basis or when: There is a change in procedure Change in regulations New equipment Deficiencies in job performance Errors in data reporting | Complete the training record form | Training record form to be kept in the site office |
| Simulation exercises | yearly | complete the exercise simulation form | Form stored in the site office and a copy send to Waste Planning. PIRMP is reviewed and updated as required. |
| Fire/evacuation Drill | yearly | Record this with the WHS training | Form stored in the site office and a copy send to Waste Planning |

12. Testing of the Plan

12.1 Manner in which the plan is to be tested and maintained

The testing of the plan is going to be based on an annual review of the plan in relation to the simulated testing, incident reporting for the past year and any changes in procedures and processes that occur on site.

The simulation and evacuation drill used to test the practical effectiveness of the plan and define areas of improvement. Reporting of incidents will be used to highlight areas of improvement in the plan. Annual reviews will be used to implement any changes that have occurred in the process of running the landfill or regulations of operating under this licence.

Incident reporting and incident simulation is required to be documented as specified in Section 10. A requirement for these documents will include the date and all those who carried out the test. A reporting sheet "Testing of the PIRMP" can be found in Appendix 15.6.

12.2 Review of the Plan

The objective of this PIRMP is to provide a description of the hazards and operations associated with the Environmental Protection Licence on site and the procedures and actions in place to mitigate any pollution event that may arise for them. Consequently, this PIRMP is a working document that is designed to ensure any changes that could affect a pollution incident are captured.

Table 1- "Table of Revisions" is the register of review identification the current version of the PIRMP. This will include the document name, the person responsible for the review, the date of change and the changes that were made.

The requirements for the document review are:

- the review is to be conducted annually from the date of the first version of the document;
- the document is to be reviewed if there is any significant change in process or operation on the site;
- the document is to be reviewed where there is a change in the legislation or the requirements of the Environmental Protection Licence;
- the document is to be reviewed where the testing of the plan identifies a failure or inefficiency; and
- a review is required to be completed within 30 days of a pollution incident.

13. References

Protection of the Environment Operations Act 1997

Protection of the Environment Operations (General) Regulation 2009

Golder Associates 2010, Site Management Plan: Dunmore Recycling and Waste Disposal Depot. (Report Number 107623020-001-R-RevD)

Environmental Protection Authority NSW, Environmental Guidelines: Solid Waste Landfills, 1996

Environmental Protection Authority NSW, Environmental Guidelines: Solid Waste Landfills, Second Edition 2016

EPA Notice of Variation of Licence No 5984, Number 1551369;DEC17/163598, File # EF13/4668 16 May 2017

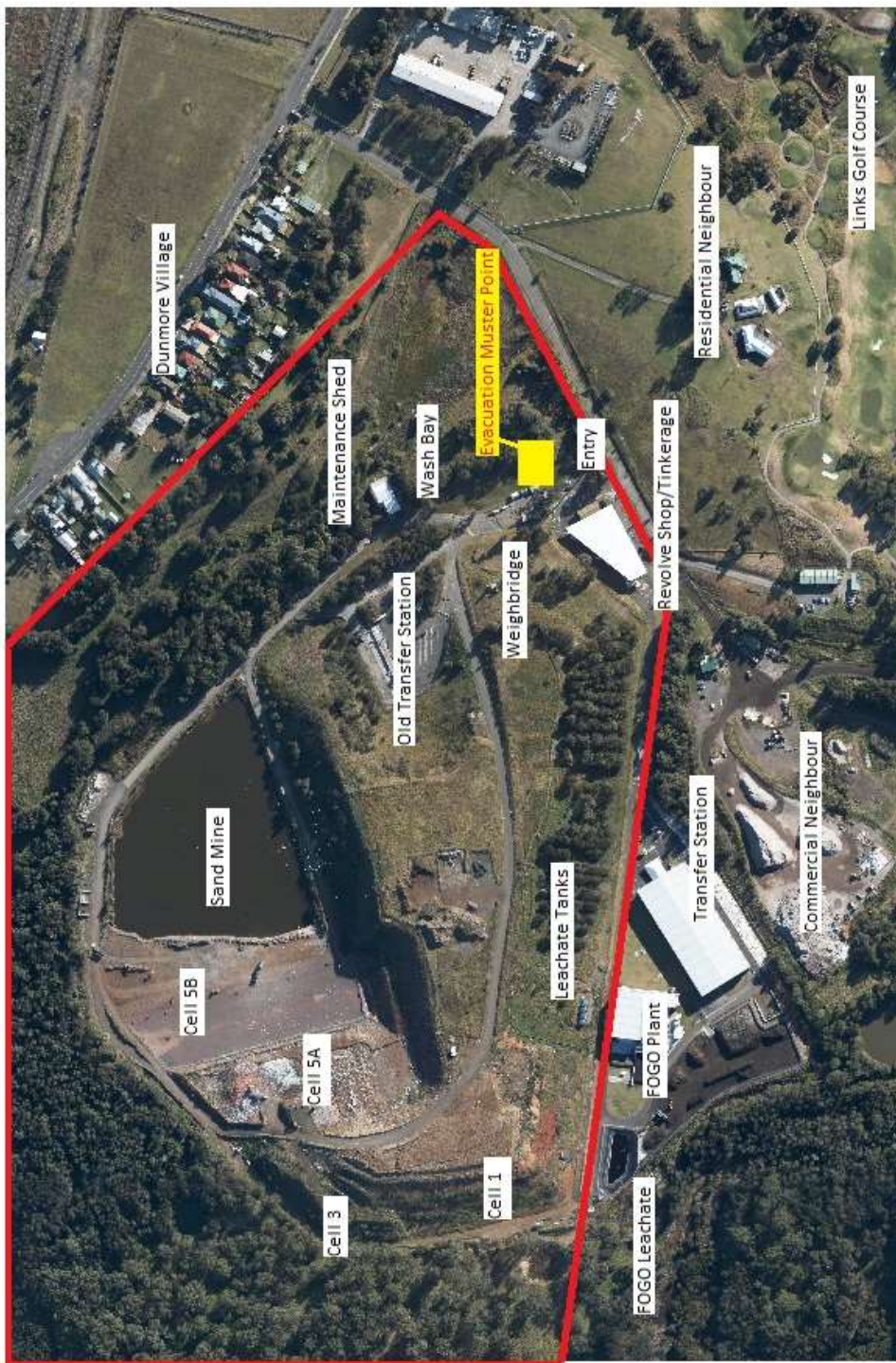
Shellharbour Local Environmental Plan 2000

Shellharbour Rural Local Environmental Plan 2004

Shellharbour City Council Hazard/Risk Assessment (No. 10660).

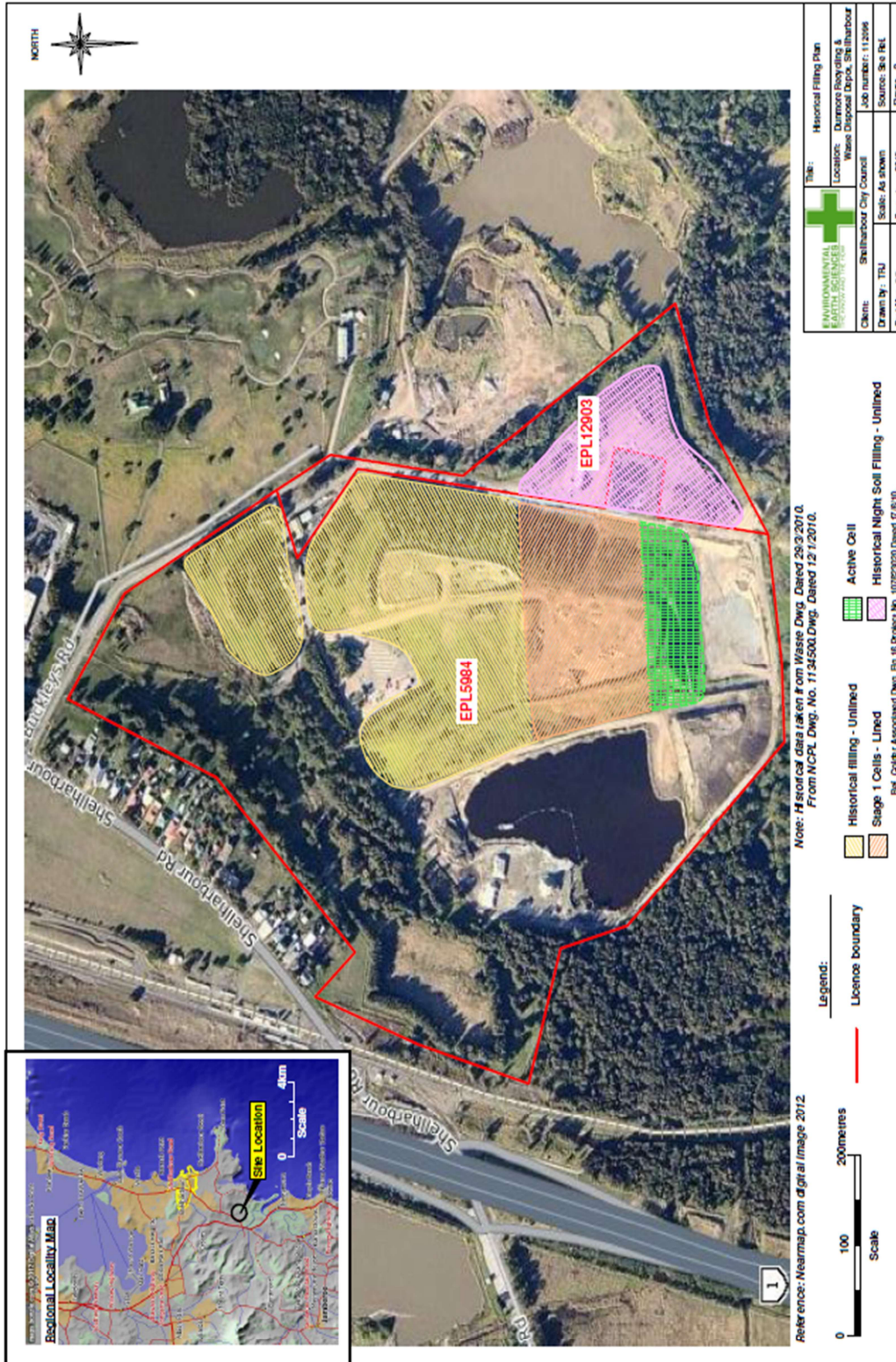
14. Figures

14.1 Site Boundaries

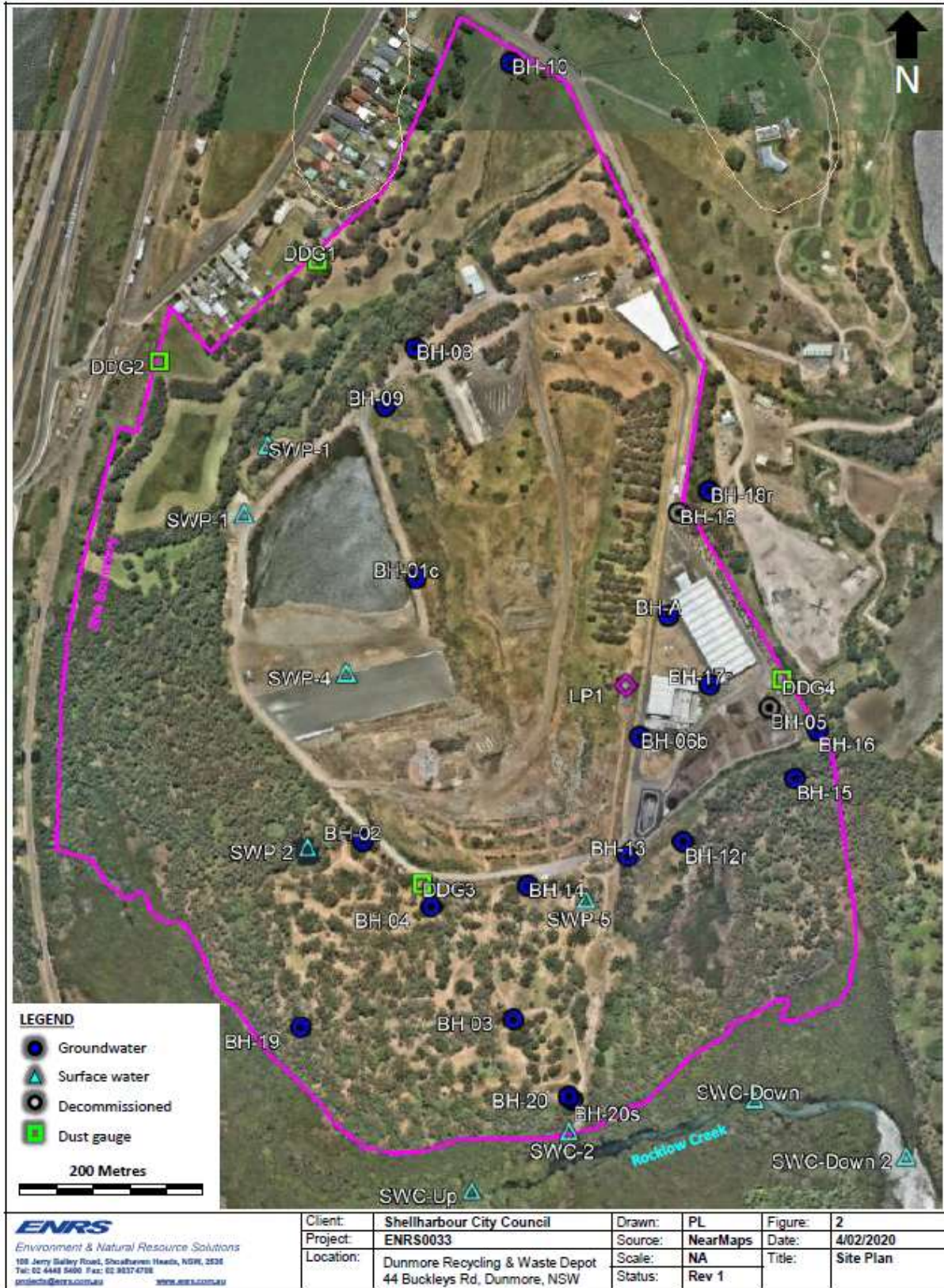


Dunmore Landfill June 2018

14.2 Historical Filling On Site



14.3 Groundwater, Surface water and dust monitoring

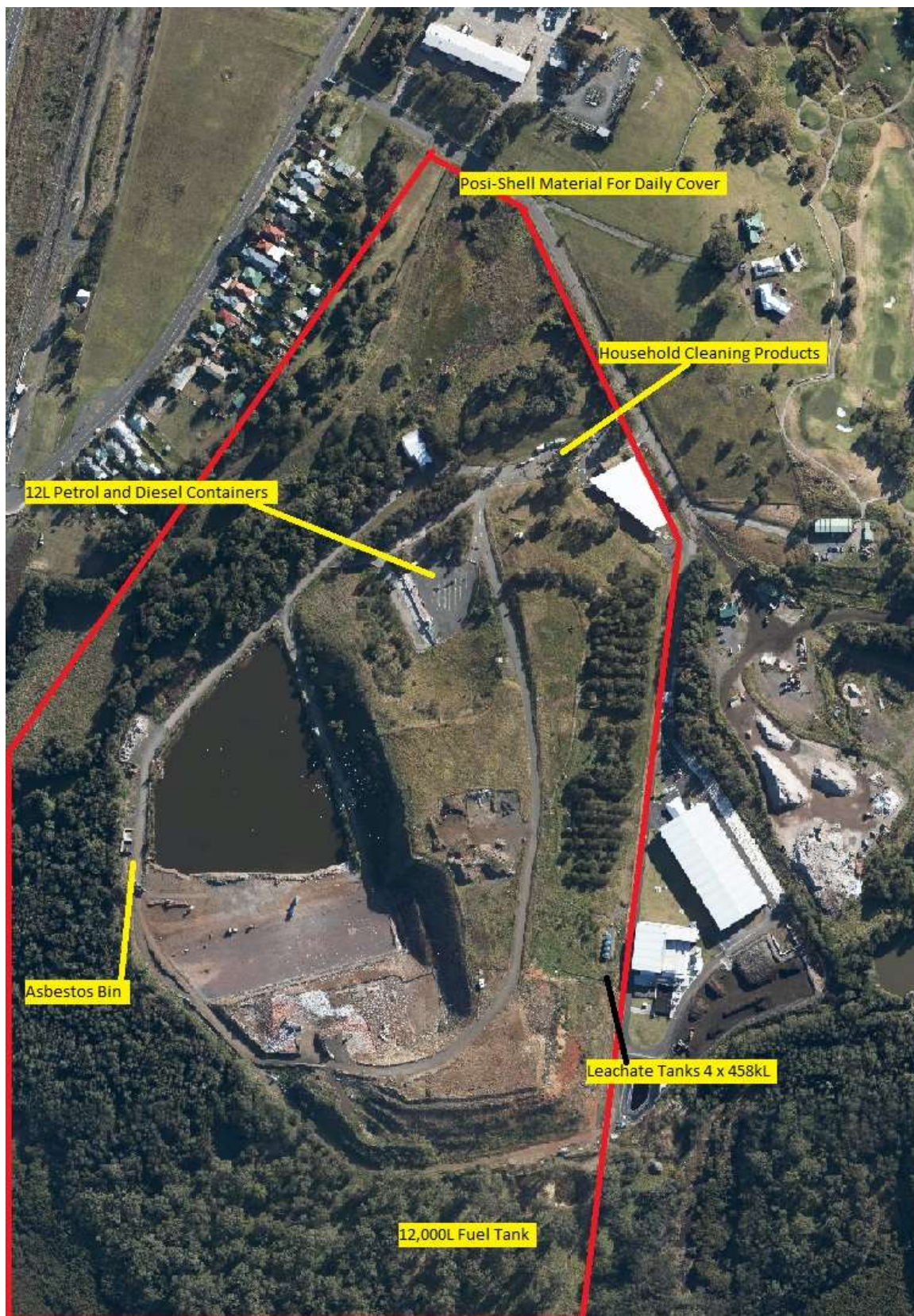


14.4 Landfill Gas Monitoring Locations



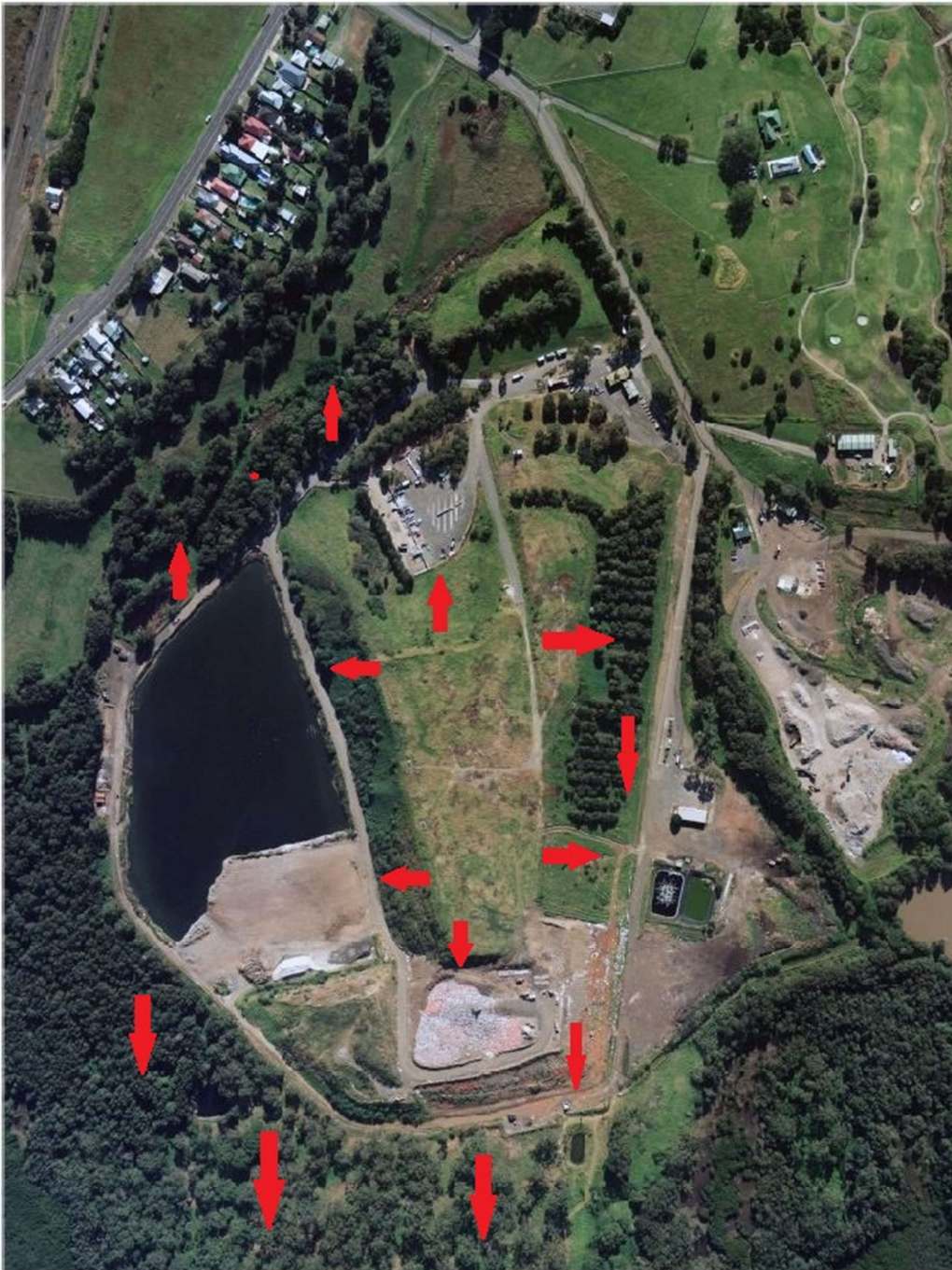
| | | | | | | |
|--|-----------|---|---------|---------|---------|------------------------------------|
| ENRS Environment & Natural Resource Solutions 108 Jerry Bayley Road, Shoalhaven Heads, NSW, 2538 Tel: 02 4443 5490 Fax: 02 93274708 projects@enrs.com.au www.enrs.com.au | Client: | Shellharbour City Council | Drawn: | PL | Figure: | 3 |
| | Project: | ENRS0033 | Source: | SixMaps | Date: | 16/01/2020 |
| | Location: | Dunmore Recycling & Waste Depot 44 Buckleys Rd, Dunmore, NSW | Scale: | NA | Title: | Surface Gas Sample transects |
| | | | Status: | Rev 1 | | |

14.5 Pollutants Onsite



Dunmore Landfill - Pollutants Onsite

14.6 Drainage and Surface Water Flow Direction

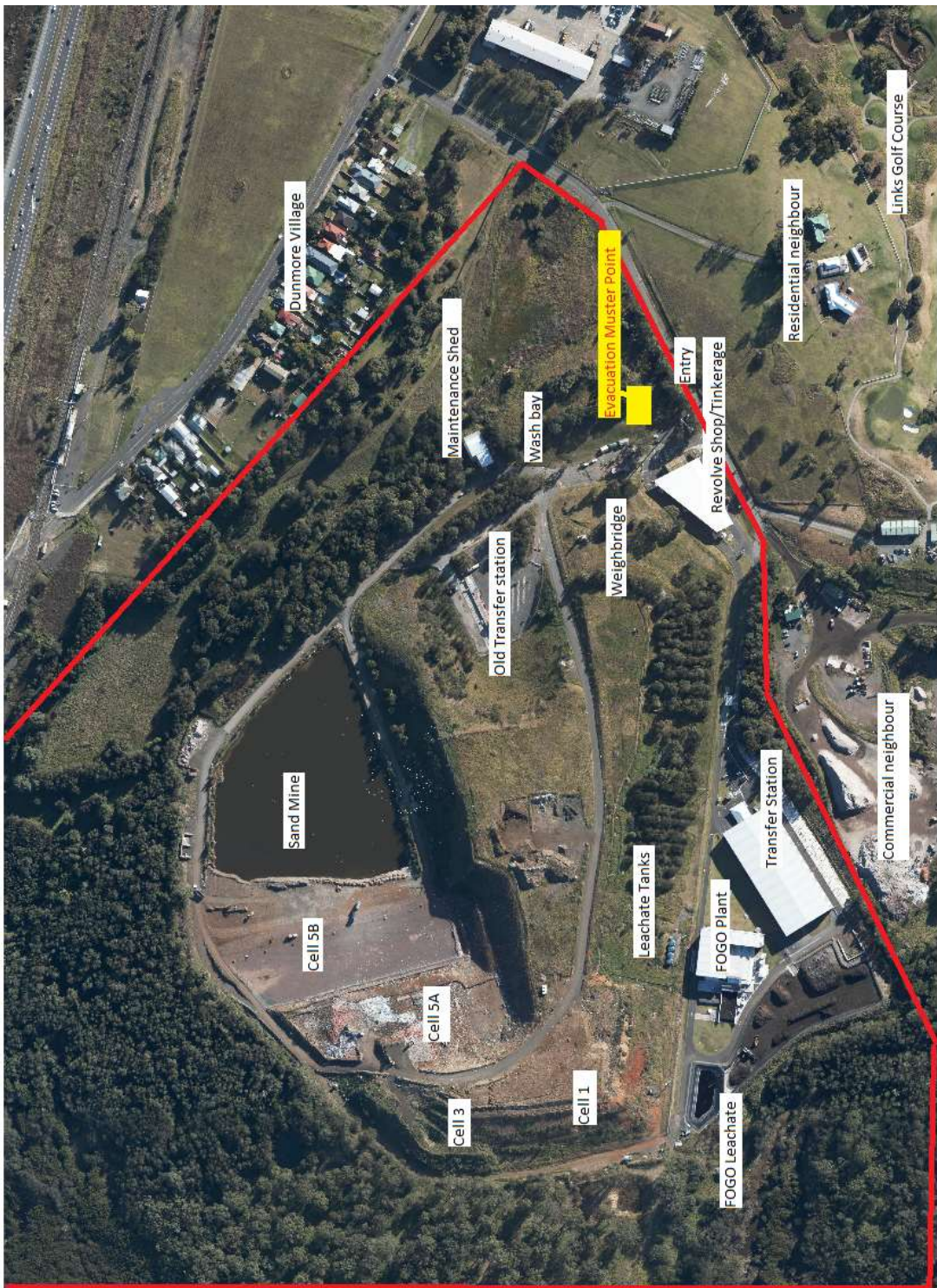


SHELL HARBOUR CITY COUNCIL

DUNMORE LANDFILL
MAY 2016



14.7 Site Map and Evacuation Muster Point



Dunmore Landfill June 2018

15 Appendix

15.1 Incident Report Form

Incident / Hazard Investigation Report

| | | | |
|--|---|---|--|
| This form to be completed by the person(s) involved in the incident / hazard and the matter closed out by the Work Health & Safety Manager. Waste Management Officer to endorse prior to filing. | | Office Use | |
| | | Report No: (Allocated by Work Health & Safety Manager) | Date Received: |
| Incident / Hazard report details – To be completed by Incident Reporter | | | |
| Name: | | | |
| Incident / hazard date & time: | Reported to: | Report Date & Time: | |
| Location: | | | |
| <input type="checkbox"/> First Aid | <input type="checkbox"/> Work Related Illness | <input type="checkbox"/> Drill rig incident | <input type="checkbox"/> Environmental Damage |
| <input type="checkbox"/> Medical treatment | <input type="checkbox"/> Fatality | <input type="checkbox"/> Property/Plant/Vehicle Damage | <input type="checkbox"/> Hazard / Near Miss |
| Describe the incident or hazard: | | | |
| | | | |
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| Pollution incidents | | | |
| Chemical Name: | | Volume of chemical: | |
| Describe Action Taken: | | | |
| | | | |
| | | | |
| | | | |
| Incident Mechanism: | | | |
| <input type="checkbox"/> Slip, Trip or Fall | <input type="checkbox"/> Motor Vehicle Accident | <input type="checkbox"/> Contact Hazardous Substance | <input type="checkbox"/> Struck by Falling Object |
| <input type="checkbox"/> Contact with Infectious Agent | <input type="checkbox"/> Manual Handling Task | <input type="checkbox"/> Struck by Moving Object | <input type="checkbox"/> Other |
| Nature of Injury: | | | |
| <input type="checkbox"/> Sprain/Strain | <input type="checkbox"/> Burn | <input type="checkbox"/> Bruising | <input type="checkbox"/> Injury to Nerve/Spinal Cord |
| <input type="checkbox"/> Dislocation | <input type="checkbox"/> Fracture | <input type="checkbox"/> Concussion | <input type="checkbox"/> Internal Injury |
| <input type="checkbox"/> Cut | <input type="checkbox"/> Other..... | | |
| Body Location of Injury: | | | |
| <input type="checkbox"/> Eye | <input type="checkbox"/> Face | <input type="checkbox"/> Back | <input type="checkbox"/> Shoulder/Arm |
| <input type="checkbox"/> Ear | <input type="checkbox"/> Head | <input type="checkbox"/> Trunk | <input type="checkbox"/> Hand/Fingers |
| <input type="checkbox"/> Leg/Foot/Toes | <input type="checkbox"/> Internal Organ | | |
| <input type="checkbox"/> Other | | | |
| Describe first aid or medical treatment: | | | |
| | | | |
| | | | |
| Who provided the treatment: | | Phone no: | <input type="checkbox"/> MTI |
| | | | <input type="checkbox"/> LTI |
| Staff member signature: | | Date: | No. of days off work: |

Incident / Hazard Investigation Report

If witness/witnesses present, please complete witness section.

| | |
|--|---------------|
| Were there any Witness's present? <input type="checkbox"/> YES <input type="checkbox"/> NO | |
| Witness Name: | Phone Number: |
| Witness comments: | |
| | |
| | |

Work Health & Safety Manager (Root cause analysis, safety bulletin requirements, investigation details)

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|---|
| Detail all deviations from standard conditions, practices and management system failures: |
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|--|
| Has this happened before? <input type="checkbox"/> YES <input type="checkbox"/> NO |
| Has a Risk Assessment been run for the Task/Hazard related to the incident? <input type="checkbox"/> YES <input type="checkbox"/> NO |
| Specify the date the risk assessment is to be completed or review. |
| Was the incident a "Notifiable Incident" under NSW OH&S Law? <input type="checkbox"/> YES <input type="checkbox"/> NO |
| If yes, attached details of notification? |
| Did the Incident Require other External Notification? <input type="checkbox"/> YES <input type="checkbox"/> NO |
| If yes, give details? |
| Is a Safety Bulletin Required? <input type="checkbox"/> YES <input type="checkbox"/> NO |
| If yes, what date was the Safety Incident Alert distributed? |
| Long term injury / follow-up required? <input type="checkbox"/> YES <input type="checkbox"/> NO |

| Work Health & Safety Manager endorsement: | | |
|---|------------|-------|
| Name: | Signature: | Date: |

| Waste Management Officer | | |
|--------------------------|------------|-------|
| Name: | Signature: | Date: |

15.2 SafeWork NSW

Notifying us

If there is a serious injury or illness, a death or a dangerous incident, you must report it to us immediately and notify your insurer within 48 hours.

You must also:

- provide first aid and make sure the worker gets the right care
- record it in the register of injuries
- help the worker [recover at work](#) by identifying and offering suitable employment, staying connected and planning with your worker, their doctor, and your insurer

2 Problems reporting a workplace injury

If you are a worker and your employer has not notified your workplace injury to the insurer or will not provide you with their workers compensation insurance policy number, our Customer Service Centre (call 13 10 50) can look up the employer details so you can call the insurer direct.

3 Notifying us

If a notifiable incident occurs, you must notify us immediately on 13 10 50 as an urgent investigation may be needed. The incident site must be preserved until an Inspector attends (or the inspector or regulator directs otherwise).

A "notifiable incident" under the work health and safety legislation relates to:

- the death of a person
- a serious injury or illness of a person
- a potentially dangerous incident

Significant penalties apply if you fail to notify an incident.

4 Other incidents where workers compensation is payable

You must notify your insurer within 48 hours of becoming aware a worker has received a workplace injury if workers compensation is payable or may be payable (such as for time lost and/or medical expenses). You may avoid paying a claims excess if there is an injury by notifying your insurer within 48 hours.

4.1 Contact details for regulators

To notify a 'notifiable incident' contact your local regulator:

| Jurisdiction | Regulator | Telephone | Website |
|------------------|------------------------------|---|--|
| New South Wales | SafeWork NSW | 13 10 50 | safework.nsw.gov.au |
| Illawarra Region | WorkSafe Regional Operations | Assistant State Inspector (02) 4222 7341 | Address: Level 1, 60 Burelli st, Wollongong NSW 2500 |

15.3 Toolbox Meeting Record

| | | |
|--------------|----------|-------------------|
| Date & time: | Location | Name of Presenter |
|--------------|----------|-------------------|

| Names of Attendees |
|--------------------|
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| Topics Discussed | Actions |
|------------------------------------|---------|
| Health and safety Issues | |
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| Environmental Issues | |
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| Planning and General Issues | |
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15.6 Testing of the Plan

| Pollution Incident Simulation | | |
|---|--|--------------------------------------|
| Name of Supervisor: <i>Kerry Penfold / Sean Anderson.</i> | | |
| Date & time: <i>9.30am</i> | Reported to: <i>K. Penfold.</i> | Report Date & Time: <i>06/06/21.</i> |
| Location: <i>Dunmore Waste Depot - Landfill</i> | | |
| Names of Attendees | | |
| <i>Kerry Penfold, Sean Anderson, Scott Kelly, RRA (Staff) - Daniel</i> | | |
| Describe the situation to be simulated: | | |
| Location: <i>Landfill</i> | Type of incident: <i>Weighbridge on fire</i> | |
| Describe the scenario: <i>Main Weighbridge on fire, all Staff evacuated and area kept clear with all Staff to assemble at assembly point.</i> | | |
| Outcomes: | | |
| Did the PIRMP get executed in a timely manner? | <i>Yes</i> | |
| Were all staff aware of their responsibilities? | <i>Yes</i> | |
| Was the incident handled in accordance with the PIRMP? | <i>Yes</i> | |
| Did all relevant authorities get considered? | <i>Yes - front gate fire, RRA (2 mins)</i> | |
| Was the handling and containment of the incident appropriate? | <i>Yes - alarm louder</i> | |
| Comments and areas for improvement | | |
| <i>Siren is only for immediate area, full sweeps of facility are done, along with check in Mandalay system.</i> | | |
| <i>Public alarm could be placed inside Shop asking public to evacuate or leave as is (RRA Staff to control public exits).</i> | | |
| Waste Depot Supervisor | | |
| Name: <i>Kerry Penfold</i> | Signature: <i>Kerry Penfold</i> | Date: <i>6/6/21.</i> |
| Landfill Operations Manager | | |
| Name: <i>Shanin Neveling</i> | Signature: <i>[Signature]</i> | Date: <i>07/06/21</i> |