

Pollution Incident Response Management Plan (PIRMP) – West Nowra Recycling and Waste Facility

March 2025

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 5877

Approved by: David Lindsay
Position/Title: Manager – Waste Services

Signature:
Date: 27 April 2025

PURPOSE:

Shoalhaven City Council (Council) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the West Nowra Recycling and Waste Facility. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

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

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2022.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2022.

Licensees should also refer to the EPA's *Guideline: Pollution incident response management plans*.

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Environment Protection Licence (EPL) Details

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|--|--|
| Name of licensee: (including ABN) | Shoalhaven City Council ABN: 59 855 182 344 |
| EPL number: | 5877 |
| Premises name and address: | West Nowra Recycling and Waste Facility, 120 Flatrock Road MUNDAMIA NSW 2540 |
| Company or business contact details | Name: James Ruprai Position or title: Acting Chief Executive Officer, Shoalhaven City Council Business hours contact number/s: 02 4429 3111 After hours contact number/s: 02 4421 3100 Email: council@shoalhaven.nsw.gov.au |
| Website address: | www.shoalhaven.nsw.gov.au |
| Scheduled activity/activities on EPL: | Composting >5,000 – 50,000 tonne Waste Disposal (application to land) Waste Processing (non-thermal treatment) Waste Storage |
| Fee-based activity/activities on EPL: | Composting Non-thermal treatment of general waste Waste disposal by application to land Waste storage – other types of waste |

Pollution incident – person/s responsible

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

| | |
|---|---|
| PIRMP activation and Managing response to pollution Incident | Name of person responsible: Peter Windley Position or title: Waste Operations Coordinator Business hours contact number/s: 02 4429 5971 After hours contact number/s: Email: peter.windley@shoalhaven.nsw.gov.au |
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Alternatives (initial contact if responsible contact is not available):

1.

Name of person responsible: Lindsay Fordham

Position or title: Waste Depot Supervisor

Contact number/s:

Email: lindsay.fordham@shoalhaven.nsw.gov.au

2.

Name of person responsible: Scott Hendrie

Position or title: Waste Depot Supervisor

Contact number/s:

Email: scott.hendrie@shoalhaven.nsw.gov.au

3.

Name of person responsible: Trista Kyriacou

Position or title: Waste Depot Supervisor

Contact number/s:

Email: trista.kyriacou@shoalhaven.nsw.gov.au

Pollution incident – person/s responsible, continued

Notifying relevant authorities

Notification should be made by a person with an appropriate level of authority within the company.

Name of person responsible: Peter Windley

Position or title: Waste Operations Co-ordinator

Business hours contact number/s: 02 4429 5971

After hours contact number/s:

Email: peter.windley@shoalhaven.nsw.gov.au

Alternatives:

1.

Name of person responsible: Elizabeth Smith

Position or title: Waste Depot Supervisor

Business hours contact number/s: 02 4429 5687

After hours contact number/s:

Email: elizabeth.smith@shoalhaven.nsw.gov.au

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2.**Name of person responsible:** Kristin Holt (notify EPA and coordinate environmental monitoring)**Position or title:** Environmental Projects Manager**Contact number/s:****Email:** kristin.holt@shoalhaven.nsw.gov.au**Notification of relevant authorities**

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

| | | |
|--|--|--|
| Fire & Rescue NSW / Rural Fire Service | Contact number/s: | 000 02 4478 4940 (Shoalhaven Fire Station) |
| EPA | Contact number/s: | 131 555 |
| NSW Health | Relevant Area Health Service: Contact number/s: | Illawarra Shoalhaven 02 4423 9500 (Shoalhaven Hospital switchboard) |
| SafeWork NSW | Contact number/s: | 13 10 50 02 4428 6700 (Nowra office) |
| Poisons Information Centre | Contact number/s: | 13 11 26 |
| SES NSW | Contact number/s: | 132 500 |
| Endeavour Energy | Contact number/s: | 13 10 03 |
| Shoalhaven Water – Environmental Health Officer | Contact number/s: | 02 4429 3214 02 4429 3214 (after hours) |
| Local Police Station (Nowra) | Contact number/s: | 02 4421 9699 |
| Local Ambulance Station (Bomaderry) | Contact number/s: | 13 12 33 |

Notification of relevant authorities, continued

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| Local authority/s | Contact number/s: | Council Ranger – 1300 293 111 Weighbridge - 02 4429 5686 |
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Identify the local authority for the area in which the premises to which the environment protection licence relates, and any area, is affected, or potentially affected, by the pollution.

SCC Switchboard – 1300 293 111

Any other identified organisation or agency requiring notification (if applicable) e.g. Water NSW, Department of Planning Industry and Environment, Roads and Maritime Services

Contact number/s:

See list above

Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):

National Parks and Wildlife – 02 4428 6300

Crown Lands – 1300 886 235

Nowra Local Aboriginal Land Council – 02 4423 0083 or 0455 053 300

Wollongong University Nowra Campus – 02 4448 0888

Residential Properties:

43 Flatrock Road; 41 Flatrock Road; 3 Flatrock Road; 310 Yalwal Road; 425A, 425B and 425C Yalwal Road; 391 Yalwal Road; 38 Old Bamarang Road and 270A Longreach Road; 170 George Evans Road

Details of how the neighbours will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert):

Early warnings and regular updates to owners and occupiers of neighbouring properties who may be affected by a pollution incident will be published on Council's Waste and Recycling Services website. Council's website address is www.shoalhaven.nsw.gov.au.

The notification will provide specific information to the neighbouring properties and local community so they can minimise the risk of harm. Information could include instructions to avoid the use of water in creeks or rivers affected by pollutant discharges or likely to be affected or remain within buildings or close all windows and doors for incidents involving emission of air pollutants.

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Description and likelihood of hazards

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:

- Pollution of water, soil or air
- Fire
- Noise
- Odour
- Litter
- Pest species and Environmental/Noxious Weeds

The qualitative measure of Likelihood adopted by Shoalhaven City Council for risk assessments is outlined below:

What is the likelihood of the incident?

- **Almost certain** the event is likely to occur in most circumstances
- **Very likely** the event will probably occur in most circumstances
- **Likely** the event could occur at some time
- **Possible** the event is unlikely to occur
- **Rare** the event may only occur in exceptional circumstances

The qualitative measure of consequence adopted by Shoalhaven City Council for risk assessment is outlined below:

What is the environmental impact of this incident?

- **Catastrophic** massive effect with international impact or permanent environmental impact
- **Major** major effect with national impact or extensive temporary or minor permanent environmental impact
- **Local** local effect with regional impact. Temporary environmental damage, consultants required for assessment and clean-up
- **Minor** minor effect with local/limited impact. Environmental clean-up done in house
- **Weak** small effect with onsite/immediate vicinity impacts. Dealt with in-house

The risk matrix is outlined below:

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| Risk Matrix | | | Environmental Impact | | | | |
|-------------|----------------|---|----------------------|--------|--------|--------|--------------|
| | | | Weak | Minor | Local | Major | Catastrophic |
| | | | 1 | 2 | 3 | 4 | 5 |
| Likelihood | Rare | A | Low | Low | Low | Low | Medium |
| | Possible | B | Low | Low | Low | Medium | Medium |
| | Likely | C | Low | Low | Medium | Medium | High |
| | Very Likely | D | Low | Medium | Medium | High | High |
| | Almost Certain | E | Medium | Medium | High | High | High |

Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood:

Table 1: Hazard Risk Assessment that could occur onsite if no mitigation activities were implemented.

| Potential Hazard | Likelihood | Environmental Impact | Risk Rating |
|---|------------|----------------------|-------------|
| Pollution of surface water | E | 3 | High |
| Pollution of ground water | D | 3 | Medium |
| Failure of sediment controls | C | 2 | Low |
| Site flooding | B | 2 | Low |
| Failure of leachate management system | C | 3 | Medium |
| Pollution of soil | E | 3 | High |
| Spill of hazardous material (eg. Diesel or oil) | C | 2 | Low |
| Pollution of air - dust | E | 1 | Medium |
| Pollution of air - odour | E | 1 | Medium |
| Pollution of air - noise | C | 1 | Low |
| Pollution of air - landfill gas | D | 2 | Medium |
| Accumulation of landfill gas in confined spaces | C | 2 | Low |
| Ignition of accumulated landfill gas | A | 2 | Low |
| Fire in stockpiles/waste | C | 3 | Medium |
| Bushfire | B | 3 | Low |
| Windblown litter | E | 1 | Medium |

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| Spread of pests/vermin | D | 2 | Low |
| Spread of environmental/noxious weeds | D | 2 | Low |
| Breach of development consent conditions | B | 1 | Low |
| Breach of hours of operation | A | 1 | Low |
| Breach of EPA licence conditions | B | 1 | Low |
| Traffic accident | B | 2 | Low |

Pre-emptive actions that have been implemented to minimise potential hazards include:

- This PIRMP
- Waste Depot Safe Operating Procedure
- Site Emergency Procedure Manual
- Landfill Environmental Management Plan
- Waste Depot Site Inductions
- Standard operating procedures and inductions for plant, equipment and vehicles
- Safe Work and Standard Operating Procedures (SWPs and SOPs):
 - Waste depot guidelines
 - Separated brick and concrete
 - Dust control
 - Mulch pasteurisation
 - Working with or near garbage/biological waste
 - Disposal of asbestos waste
 - After hours access for emergency and/or essential services
 - Scavenging
 - Working on batters
 - CRC operations
 - Plant operations in customer service areas
 - Tip face operations
- Liquid storage containers banded and/or undercover
- Onsite spill kits near higher risk activities
- First aid kits across the site and within all vehicles
- Onsite water carts to wet down roads and hardstand areas and to provide onsite firefighting capability
- Personal Protective Equipment

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- Radio communication equipment for communications and alerts

Conditions/events that increase the likelihood of an incident or environmental impact include:

- High rainfall
- Incorrect storage or management of waste and stockpiles
- Poor management of waste and stockpiles
- Ineffective cover (daily or final capping) of waste
- Acceptance of unauthorised waste
- Poor construction and management of landfill cells and infrastructure (such as leachate dams, diversion drains etc)
- Poor maintenance and operational procedures of machinery and plant
- Incorrect management of leachate disposal system (sprayers and disposal field)
- High wind conditions (dust generation, wind blown odour)
- Poor management of methane collection system
- Fire danger periods (bushfire season)
- Incorrect management of mulch could ignite fire
- Operating machinery or plant outside hours of operation
- Uncovered waste loads
- Incorrect transport, handling and management of weed waste
- Poor control of pest species

Pre-emptive actions to be taken

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

Incorrect storage or management of waste, material and stockpiles

- Liquid wastes, or materials with a spill risk (such as batteries), stored in bunded and/or rooved areas.
- Not disposing of or storing waste in standing water
- Disposing of wastes in manageable layers to optimise compaction
- Covering all exposed waste at the end of each working day
- Minimising disturbance of previously landfilled areas
- Ensuring stockpiles are appropriately located and shaped to minimise contamination and erosion. Combustible wastes (tyres and green wastes) to be placed in piles and windrows no higher than 3m and away from working and public areas.

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- Any empty drums accepted at the depot must be washed clean and punctured in order to not contain any residual chemical fuels.
- All fuels and flammable solvents used for operational purposes to be stored in suitably ventilated and secure storage areas.
- Waste oil and other liquids to be stored within a bund of 110% capacity of the volume of the stored material
- Waste will be disposed in a manner that minimises any nuisance or environmental impact.
- Landfilled waste will be compacted as much as possible, preferably to a density ranging between 800 kg/m³ and 1,000 kg/m³, subject to the depth of the waste layer and plant used to compact the waste.
- Each active waste disposal tipping face will be maintained, as far as practicable, in a dry condition during the life of that landfill cell stage.

Ineffective cover (daily or final capping) of waste

- At the end of each working day, all exposed waste surfaces at the active tipping face that have not achieved final landform levels will be covered with a minimum 150mm thick layer of VENM or alternative daily cover as approved by the EPA.
- Placement of the daily cover layer is not restricted to the end of a working day. A daily cover layer may be placed over the waste at any time, and as required, for environmental management reasons (eg: to mitigate erosion, provide litter control, minimise the likelihood of vermin and minimise odours).
- Intermediate covering layers will be applied to any exposed waste surface that:
 - Has not achieved final landform level; and
 - Will be inactive for a period of more than 90 days.
- Completed landfill cells are to be capped with a final capping layer within 6 months of the final delivery of waste to the facility.

Green waste processing (shredding, screening and pasteurisation)

- Ensure compliance with standard operating procedures for mulch pasteurisation to avoid dust and odour generation
- Monitor presence of surface water around windrows to prevent contamination and saturation
- Avoid shredding, screening and turning of windrows on windy days
- Utilising water spraying where appropriate to minimise emission of dust
- Proper training of involved staff

Acceptance of unauthorised waste

- Erection and display of appropriate signage and the entrance to the facility indicating the types of wastes accepted
- Visual and CCTV inspection and screening of all incoming and outgoing loads
- Refusing entry to vehicles carrying wastes not accepted at the facility
- Inspection and screening of waste at the weighbridge. Any waste suspected of being unacceptable will be refused
- In the event that unacceptable waste is identified in the landfilling and / or stockpiling areas, Council will immediately segregate, isolate and contain the waste away from the active waste disposal area / stockpiles. Details of the waste, such as type, the source and the vehicle and driver identification, will be recorded. The waste carrier (driver) will be advised the waste is not acceptable and must be loaded back onto the vehicle where practical and safe to do so, at the owner's

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cost. The vehicle will then be escorted from the landfill by Council staff. Council may, if deemed necessary and / or appropriate, advise the driver of the vehicle to contact the EPA for advice on the correct disposal of the unacceptable waste (at the waste owner's cost). Council Rangers may also be contacted and informed of the incident;

- In the event that unacceptable waste is identified during the stockpiling or spreading and compaction of deposited waste, Council will segregate, isolate and contain the waste away from the active waste disposal area.

Poor construction and management of landfill cells and infrastructure (such as leachate dams, diversion drains etc)

- All design and construction work for the Facility will be undertaken by suitably qualified and experienced personnel and consultants / contractors in accordance with relevant Australian construction standards, and industry best practice guidelines.
- Operation of the facility will be undertaken in accordance with the LEMP and the conditions of EPL number 5877.
- All environmental monitoring and / or sampling will be undertaken by suitably qualified and experienced Council staff and / or environmental consultants.
- Internal Quality System audits will be conducted by Council and external audits undertaken as required.
- Regular inspection and maintenance of infrastructure (such as leachate system, surface water system, methane collection system, etc)
- Regular monitoring of groundwater, surface water, surface methane and subsurface methane in accordance with the EPL.
- Regular inspection and maintenance of completed/capped areas

Poor maintenance of machinery and plant

- Ensure plant and equipment are appropriately serviced and kept in good working order
- Avoiding use of plant or machinery with defective pollution control devices (mufflers, filters etc)
- Avoiding use of plant, machinery or equipment with tonal movement alarms
- Minimise noisy/potentially noisy work adjacent to sensitive land uses (residential properties)

Incorrect management of leachate system (dams, pumps/pipes, sprayers and irrigation field)

- Avoid operating spray irrigation during windy or wet conditions
- Regular inspection of leachate irrigation field for evidence of failure or saturation
- Monitoring water volumes in the leachate system (visual and electronic monitoring)
- Regular maintenance of leachate management system including civil infrastructure (dam walls, bunds, overflow points etc) and plant items (sprinklers, pumps, wells etc)

High wind conditions (dust generation, windblown odour, windblown litter)

- Minimise odour generation by managing waste and odour generating activities appropriately
- Minimise dust generating work, including shredding, screening and turning windrows, during windy periods
- Restrict vehicle speeds at the facility

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- Use of a water cart
- Stockpile heights limited to 3m
- Minimise exposed earthworks/tipping areas
- Use of daily and intermediate cover
- Ensure plant and equipment are fitted with appropriate pollution control devices
- Immediate burial and/or covering of dust generating waste loads

Poor management of methane collection system

- Avoid flaring methane in adverse weather conditions
- Regular inspection and maintenance of methane collection system
- Monitoring gas volumes and discharge concentrations within the system

Incorrect management of mulch could ignite fire

- Adherence to Council's standard operating procedure for mulch pasteurisation, including regular temperature checks of mulch stockpiles
- Daily inspection of mulch stockpiles to identify any visual evidence of ignition

Control of litter

- Establish and maintain strategically located litter fences (temporary and permanent)
- Regular litter collection throughout the facility and outside the perimeter where required
- Covering loads when entering and exiting the site and during transit
- Avoid tipping and waste handling during windy conditions
- Active waste tipping area managed to mitigate windblown litter
- Prompt, efficient and continuous compaction and covering of waste when uploading
- Storage of light materials prone to becoming windblown litter (such as Styrofoam) within enclosed areas/buildings
- Litter collected from surface water drains, inlets or pipes and culverts on a regular basis

Incorrect transport, handling and management of weed waste

- Educate waste transporters on appropriate transport and handling of weed wastes
- Ensure proper pasteurisation of green waste stockpiles to ensure thermal destruction of weed wastes, including seeds
- Inspection and screening of green waste stockpiles during mulching. Any waste suspected of being unacceptable will be segregated, isolated and inspected

Poor control of pest species

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- Use traps/baits to deter and/or control vermin
- Keep leachate and stormwater ponds free of mosquito breeding larvae
- Ensure waste is appropriately covered/managed to minimise attracting pests species

Inventory of pollutants

Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:

Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.

Example

| Location/Tank | Max. quantity | Contents | Comments |
|-----------------------------------|---|---|--|
| Fuel trailer (mobile) | 2,000L | Diesel fuel for operational purposes | |
| Fuel trailer (mobile) | 100L | Unleaded fuel for operations purposes | |
| CRC liquid waste collection | 7000L | Waste oil, paints, household chemicals | Self-contained and bunded storage tanks/cages for individual waste streams. Regularly monitored and emptied on demand as required to ensure minimal volumes stored onsite. Household chemicals are discouraged – individuals are directed to household chemical cleanout collections. When household chemicals are identified onsite they are removed as soon as practical. |
| CRC – non liquid waste collection | 30m ³ of e-waste ~30 batteries ~30 gas bottles | Batteries, LGP bottles, e-waste | Covered and bunded storage areas for each individual waste stream. Gas bottles should be delivered empty therefore volumes of gas are expected to be negligible. Stockpiles are regularly monitored and emptied on demand as required to ensure minimal volumes are stored onsite. |
| Tyre stockpile | 150T | Waste tyres | Stockpiled separately in piles no more than 3m in height and located away from public and working areas Management in accordance with the current version of NSW Fire Brigade Guidelines for Bulk Storage of Rubber Tyres |
| Mulch windrows | 5,000T at one time and 50,000T annually (combined with green waste) | Shredded greenwaste undergoing pasteurisation process | Processed in windrows no more than 3m in height and located away from public and working areas |

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| Green waste stockpiles | 5,000T at one time and 50,000T annually (combined with mulch) | Unprocessed green waste | Stockpiled separately in piles no more than 3m in height and in areas subject to regular visual inspection |
| Asbestos | 15m ³ | Appropriately wrapped asbestos – household quantities only | Asbestos deliveries require pre-booking to ensure appropriate management and burial/disposal. When unexpected deliveries arrive a designated, signposted storage area within a skip bin is utilised until burial can be arranged. |
| Cleaning products | 60L | Near storeroom off main crib room | Cleaning chemicals for use in general day-to-day cleaning. Appropriate training and storage methods |
| Galvanizing touch-up paint | 4.8kg | Workshop | For use in routine maintenance activities |
| Rapid set concrete | 160kg | Workshop | For use in routine maintenance activities |
| Insecticides | 2.4kg | Small quantities in site offices and cleaning supply store | For use by staff on their person (insect repellent); in buildings (bug spray) during routine operational activities and in the control of pests/vermin |
| Paints (operational) | 8.4kg | Workshop | For use in routine operational and maintenance activities |
| White Zinc | 3.2kg | Workshop | For use in routine maintenance activities |
| Lubricants | 2.2l | Workshop | For use in routine maintenance activities and mechanical repairs |
| Oils (operational) | 500l | Workshop | For use in routine maintenance activities and mechanical repairs |
| Coolant (operational) | 200l | Workshop | For use in routine maintenance activities and mechanical repairs |
| Grease | 100l | Workshop | For use in routine maintenance activities and mechanical repairs |
| Herbicide | 50l | Workshop and cleaning supply store | For use in routine activities to control weeds (noxious and environmental) |
| Leachate | 11,000m ³ (max. volume) | Leachate and first flush dams on western boundary south of MRF area | Routinely irrigated onto disposal field in Stage 1 to evaporate off water and reduce volume stored onsite. |

Safety equipment

Describe the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

Three mobile appliances with total water capacity of approx. 40,000L – mobile plant able to be moved from one location to another to assist in fire fighting activities
Carbon Dioxide extinguishers – located in several locations throughout the site including: training room, main crib room, buy-back crib room, weighbridge officer, recycled materials shed, CRC shed, administration office and supervisors office

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Water extinguisher – located in training room

Dry chemical extinguisher – located in in several locations throughout the site including: weighbridge office, main office, backhoe, dozer, fuel truck, water truck, main crib room, all plant/machinery, CRC

Aqueous film forming foam (AFFF) – located in the recycled materials shed

Fire hose reels – located in in several locations throughout the site including: buy back centre, transfer area, co-mingle shed, CRC shed, glass plant and storage shelter, cardboard shelter and rubber crumb plant

External sprinkler systems containing fire retardant – fitted in some earthmoving equipment that can be activated from inside the cabin

Spill kits – located at weighbridge, CRC shed, comingled recycling shed and general wastes delivery shed

Fire blanket – located in supervisors office and administration lunch office room, and main crib room.

Emergency shower – located in in several locations throughout the site including: outside recycling shed/CRC and behind the buy-back lunch room

First aid kits – located in in several locations throughout the site including: weighbridge, main crib room, recycling materials shed, transfer area, co-mingle area, administration building, supervisors office, glass plan and buy-back centre.

Eyewash station - located in in several locations throughout the site including: transfer area, CRC shed, co-mingle shed, glass plans and main crib room.

AED – located at the weighbridge

Personal protective equipment (PPE) including long shirt, long pants, high-visibility reflective shirts/vests/jackets, sunglasses/eye protection, hardhat (where appropriate), steel capped shoes to be worn by operational staff and consultants involved in onsite activities (such as water sampling), and task specific PPE as required.

All plant and equipment used in the provision of services at the Depot will have all mandatory safety and noise reducing equipment.

Communicating with neighbours and the local community

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

Early warnings and regular updates to owners and occupiers of neighbouring properties who may be affected by a pollution incident will be published on Council's Waste and Recycling Services website. Council's website address is www.shoalhaven.nsw.gov.au.

The notification will provide specific information to the neighbouring properties and local community so they can minimise the risk of harm. Information could include instructions to avoid the use of water in creeks or rivers affected by pollutant discharges or likely to be affected or to remain within buildings or close all windows and doors for incidents involving emission of air pollutants.

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

Council's community education team provide substantial information on the Council's waste section webpage in relation to waste management and preventing contamination/environmental harm. In addition, the education team provide written information brochures, informational letters with rates notices and offer free 'tip tours' as well as having a dedicated section on Council's webpage. The aim of these engagements is to educate the community about what can be accepted at the site, what

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actions Council are taking to prevent environmental harm and how the community can contribute to this goal (ie by not contaminating waste streams, delivering hazardous materials to the correct places etc).

Specific information to be provided in the event of a pollution incident may include:

- The nature of the incident, the type of hazard that exists and the extent of impact;
- The type of pollutant;
- Prevailing winds;
- Height and magnitude of emission;
- Location of any off-site fall-out impacts;
- The area affected by the incident;
- Advice on whether to evacuate, or stand-by to evacuate the area;
- Possible impacts on sensitive receptors;
- Instructions on whether to close doors and windows;
- Who to contact; and
- When the next update will be
- What Council are doing to manage the incident

Minimising harm to persons on the premises

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

Follow the instructions outlined in *Site Emergency Procedure Manual – West Nowra Recycling and Waste Depot, version 6, 17 November 2023*, in particular Section 4.3 Emergency Response Guidelines, and Contact the appropriate persons and relevant authorities, as per this *Pollution Incident Response Management Plan*.

Minimising harm to persons on the premises is achieved through:

- Training
- Signage
- Personal protective equipment – *risk assessment have been/are undertaken for all tasks which identify the required PPE for the job.*
- Administrative procedures –
 - Inductions
 - Risk assessments
 - Daily toolbox talks and site inspections
 - Inspecting, measuring and recording all wastes received and its source
 - Informational and instruction signage across the site

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- Asbestos policy and procedures
- Material safety data sheets and handling/management training for relevant staff
- Engineering controls
 - Leachate management system (dams, pumps, irrigation)
 - Surface water drainage
 - Sedimentation ponds
 - Safety showers and eye wash stations
 - Designated storage areas for dangerous or problematic wastes such as gas bottles, batteries, fluoro tubes, oils etc.
 - Appropriately located fire extinguishers, spill kits, first aid kits, fire hose reel etc.

Maps

Provide a detailed map (or set of maps) showing the:

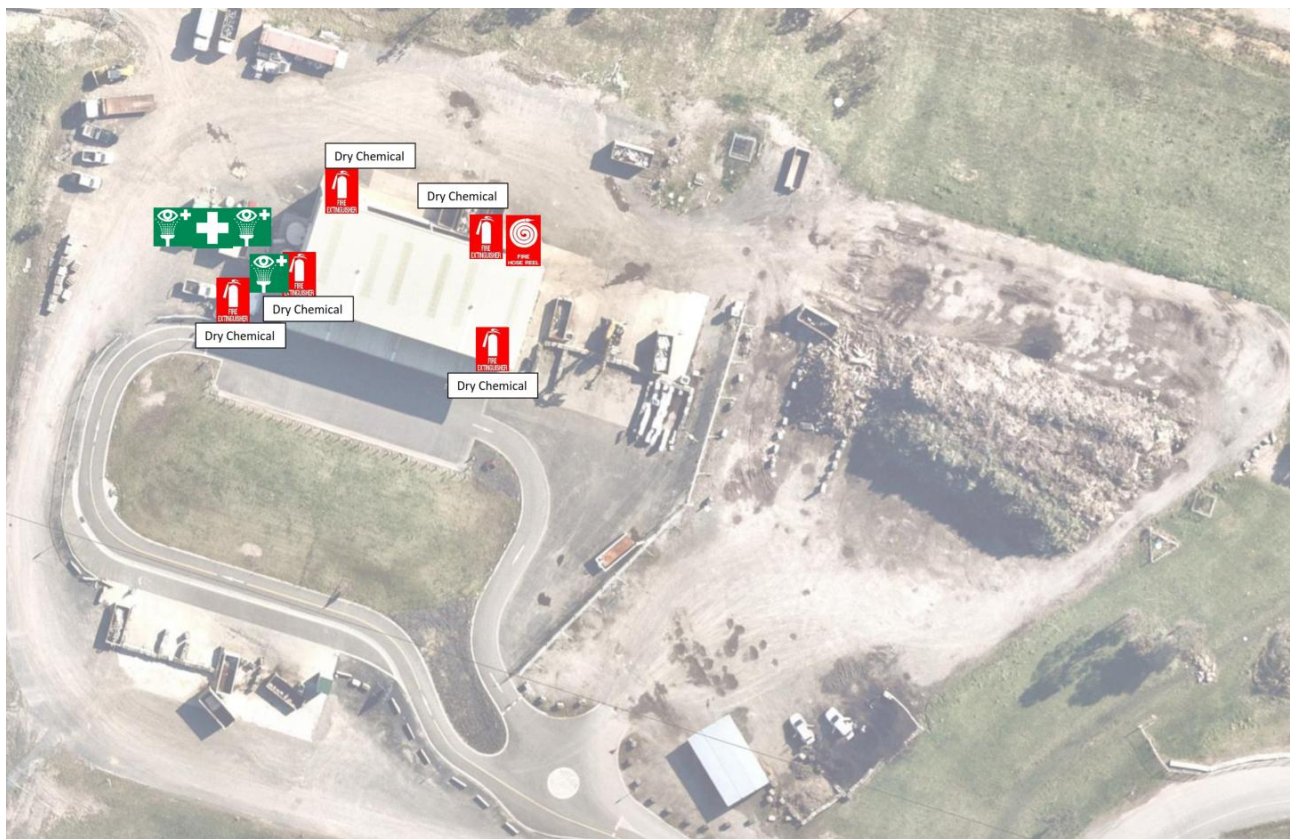
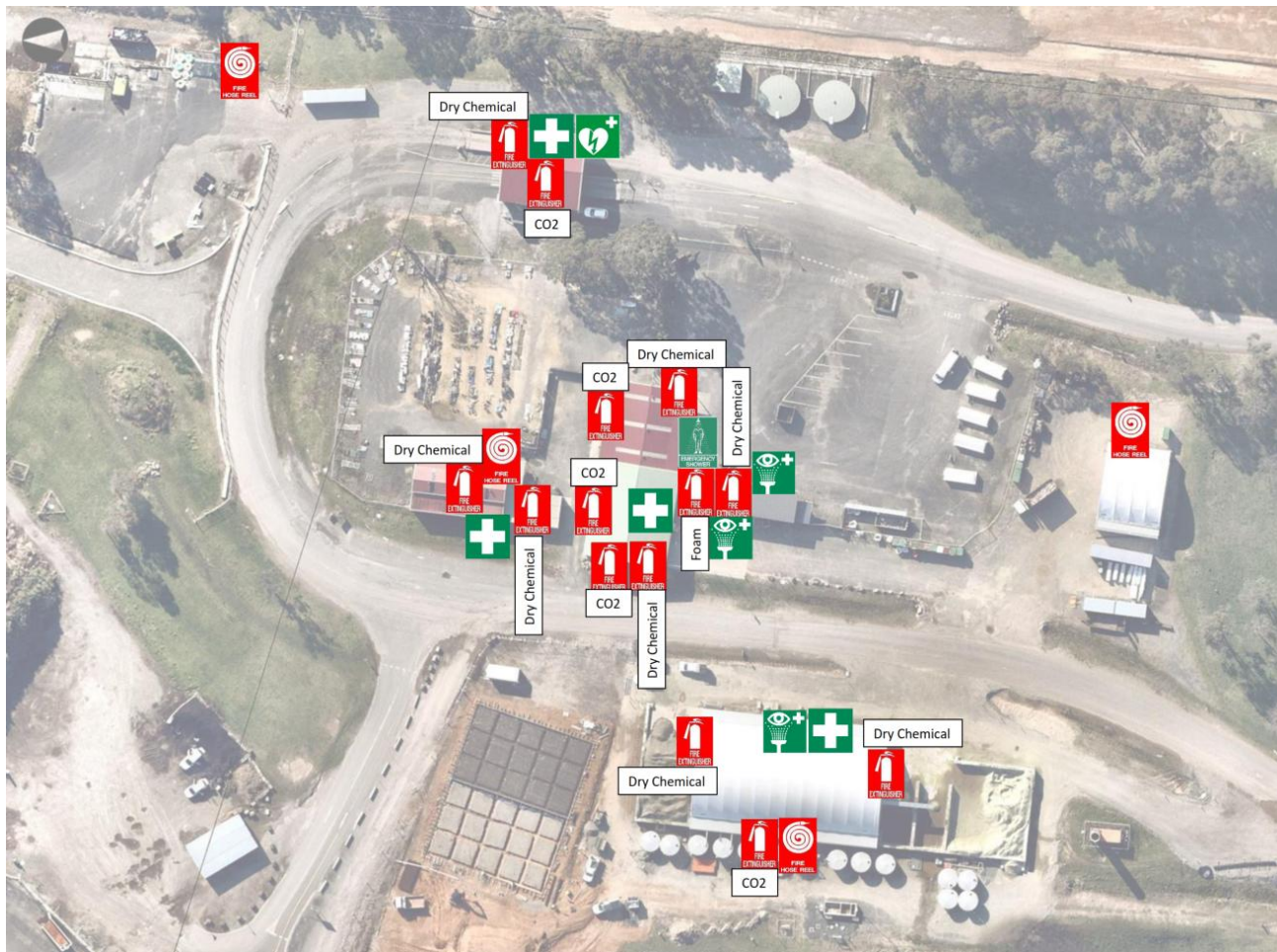
- location of the premises to which the licence relates
- surrounding area likely to be affected by a pollution incident
- location of potential pollutants on the premises
- location of any stormwater drains on the premises.

It is also recommended the position of any discharge points or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body that stormwater drains located on the premises discharge to).

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Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident:

1. In the event of a pollution incident at the West Nowra Recycling and Waste Facility that requires Emergency Services, 000 should be called immediately.
2. The area should then be isolated to ensure there is no access other than relevant emergency response personnel.
3. Notify site manager/supervisor of incident – supervisor to establish whether the pollution incident will cause material harm to the environment, and if so, activate the PIRMP and notify the Team Coordinator
4. If safe, prevent further pollution at source (where applicable) ie. Stand tipped container upright, plug opening in container, create temporary bund/dam etc
5. Deploy containment devices (spill kit for liquids, fire extinguishers or fire hose for fire, water cart for dust etc)
6. Team Coordinator/Supervisor and Environmental Projects Manager to notify relevant authorities and weighbridge
7. Ensure future operations adopt best-practice methods for pollution control/avoidance

When a pollution incident occurs, the severity of the event will be established by the Site Coordinator, to determine the extent of communications:

Level 1 – Pollution could only affect those in the immediate area

Site workers notified and the area cordoned for pollution incident management under the direction of Site Manager/Supervisor and/or relevant authority, such as Fire & Rescue.

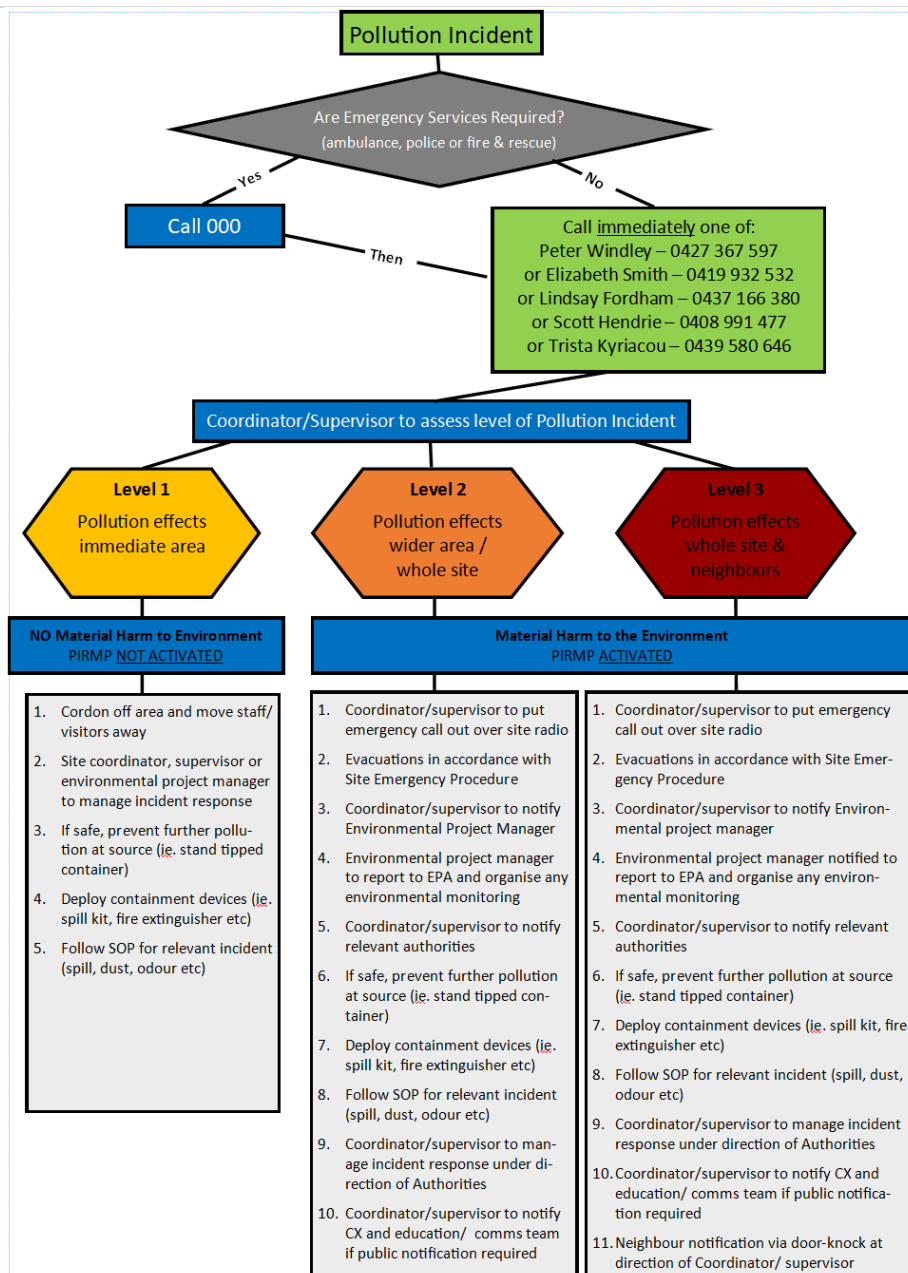
Level 2 – Pollution could affect all those on site

Site evacuated and pollution incident management under the direction of Site Manager/Supervisor and/or relevant authority, such as Fire & Rescue.

Level 3 – Pollution could affect whole of site and surrounding neighbours

Site evacuated, pollution incident management under the direction of the Site Manager/Supervisor and/or relevant authority, such as Fire & Rescue. Neighbours notified by door knock (if threat is immediate) by Site Manager/Supervisor or through notification on Council's webpage and updated regularly as required during incident management.

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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

Relevant Authorities

| | |
|---|---|
| Fire & Rescue NSW / RFS | 000 02 4478 4940 (Shoalhaven Fire Station) |
| NSW Health | 02 4223 9500 (Shoalhaven) |
| SafeWork NSW | 131 050 02 4428 6700 (Nowra office) |
| Poisons Information Centre | 13 11 26 |
| SES NSW | 132 500 |
| Endeavour Energy | 13 10 03 |
| Shoalhaven Water – Environmental Health Officer | 02 4429 3214 |
| Local Police Station (Nowra) | 02 4421 9699 |
| Local Ambulance Station | 13 12 33 |
| Council Ranger | 1300 293 111 |
| ENRS | 02 4448 5490 or 0403 536 |
| EPA | 131 555 |

Relevant Staff

| | |
|-------------------------------|--------------|
| Roxanne Goodman | 0461 543 509 |
| Environmental Project Manager | 0402 004 554 |
| David Lindsay | 0418 791 451 |
| CX | 4429 3111 |
| Weighbridge | 4429 5683 |
| OHS Safety Officer | 0434 566 269 |

Neighbours

| | |
|---------------------------|--------------|
| National Parks & Wildlife | 02 4428 6300 |
| Crown Lands | 1300 886 235 |
| Nowra LALC | 02 4423 3163 |
| Wollongong University | 02 4448 0888 |

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

8. Contain pollutant (liquid, solid, gas) to the site where possible or contain the event to prevent spread (fire)
9. Move nearby materials away from incident to prevent spread, where appropriate
10. Divert surface water around the site, where appropriate
11. Commence environmental monitoring (water or air) as required by the EPL, directed by the EPA, or recommended by Council's environmental consultant (ENRS)
12. If necessary, publish public health warnings on Councils webpage
13. PIRMP to be 'tested' (reviewed) within one month of pollution incident

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

14. Continue environmental monitoring as required or directed.
15. Prepare and implement a pollution clean-up plan, if required

Coordinating with persons

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

1. Whoever becomes aware of a pollution incident (whether an employee, contactor, agent, occupier of premises or other) must notify immediately:
 - o Waste Depot Supervisor (Lindsay Fordham, Scott Hendrie, Elizabeth Smith or Trista Kyriacou); or
 - o Waste Operations Coordinator (Peter Windley or Ben Hasler), or
 - o Waste Services Manager (David Lindsay)
2. Waste Supervisor (or Coordinator, or Manager) to contact Waste Depot Supervisor (Elizabeth Smith) who will notify weighbridge operator, Environmental Projects Manager (Kristin Holt) and relevant emergency services:

Fire & Rescue NSW / Rural Fire Service

000

02 4424 4424 (Shoalhaven Fire Station)

NSW Health

Illawarra Shoalhaven

02 4223 9500

131 050

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| SafeWork NSW | 02 4428 6700 (Nowra office) |
| Poisons Information Centre | 13 11 26 |
| SES NSW | 132 500 |
| Endeavour Energy | 13 10 03 |
| Shoalhaven Water – Environmental Health Officer | 02 4429 3214 |
| Local Police Station (Nowra) | 02 4421 9699 |
| Local Ambulance Station (Bomaderry) | 13 12 33 |

- Environmental Projects Manager to report to EPA incident hotline and prepare written report as necessary. In the case of water or soil contamination Environmental Projects Manager to advise Council's environmental consultant (ENRS) and determine need for ongoing environmental monitoring.

| | |
|-------------|------------------------------|
| EPA | 131 555 |
| ENRS | 02 4448 5490 0401 518 443 |

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

EPA communications to Environmental Projects Manager.

All other correspondence to Waste Operations Coordinator or authorised representative.

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

All Council Employees and Agents of Council (Contractor) at the Premises will be made aware on the implementation of the PIRMP as follows:

- Existing Council Employees – during the regular toolbox meetings,
- New Council Employees – as part of the employee's induction at the Premises,
- Existing Agents of Council (Contractors) – during regular Contractor toolbox meetings, and
- New Agents of Council (Contractors) – as part of the Contractor's employee induction at the Premises.

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Refresher training will be conducted annually. A written record of all Council Employees trained must be kept and maintained, the same applies to all Agents of Council (Contractors). Records may be audited.

Testing and updating of the PIRMP

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

Detail the manner in which the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

The requirements for the document review are:

- Annual reviews starting from the date of the first version of the document
- Review if there is any significant change in process or operation on the site
- Review if there is a change to legislation or the requirements of the Environmental Protection Licence
- Review where any testing event indicated a failure or inefficiency in the plan
- A 'test' and review is require within 30 days of any pollution incident

Detail how the testing is documented and recorded (this must include the testing dates and the names of all staff members who carried out the testing):

Detail the dates on which the plan was updated:

Example: PIRMP testing details

| Date tested | Tested by (to include the names of all people involved in testing) | Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan. | Finding of test, including issues identified | Next scheduled testing date (must be within 12 months from current test) |
|-------------|---|---|---|---|
| 23/08/2022 | Waste Depot Supervisor and Environmental Projects Manager | Incident – fire in comingled recycling shed. Fire brigade called and attended. | PIRMP worked well though refresher training could be of benefit | 27/03/2023 |

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| 8/03/2023 | R.Garrick, G.McLean, S.Attard, S.Collier, J.Jenson, R.Schafer, R.Poher, S.Evans | Incident – fire in skip at community drop-off shed. No emergency services attendance required. | PIRMP worked well and up to date. Plan effective and workable. | 27/03/2024 |
| 10/08/2023 | S.Hendrie, D.Herbert, J.Thompson, G.Norford, M.DeZoete | Fire onsite. No emergency services attendance required. | PIRMP worked well and up to date. Refresher training required. | 09/08/2024 |
| 20/02/2024 | L.Fordham, | Fire onsite. No emergency services attendance required. | PIRMP worked well and up to date. Plan effective and workable. | 19/02/2025 |
| 11/04/24 | T.Kyriacou, P.Fisher, M.Betts, S.Talbot, J.Andersn, M.Hilder, A.Ociana, C.Chesher, J.Smalle, B.Ison, J.Wardle, C.Wood | Fire onsite. No emergency services attendance required. 12/03/24 | General refresher training | |
| 18/04/2024 | S.Hendrie, B.McAnulty, S.McCallum, D.Herbert, M.DeZoete, M.Robson, J.Thompson, P.Kay, E.Coleman, G.Barker | Fire onsite. No emergency services attendance required. | PIRMP worked well and up to date. Plan effective and workable. | |
| 15/11/2024 | T.Kyriacou | Fire onsite. No emergency services attendance required. | PIRMP worked well and up to date. Plan effective and workable. Improve fire fighting capability by installing IBC of water at transfer shed. | |

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PIRMP update details

| Date update occurred | Reason for update (e.g. address issues identified in testing, contact details/personnel have changed) | Details of updates (nature of changes to PIRMP) | Date the updated version uploaded to website (if applicable) | Date of completion |
|----------------------|---|--|--|--------------------|
| 27/03/2021 | Annual Review | | | |
| 27/03/2022 | Annual Review | | | |
| 10/10/2022 | Update contact details, personnel, relevant agencies, new EPA format required | Changes to format, new site plan, update personnel and contact details, incorporate detail from LEMP, update references to SEPS. | | 27/03/2023 |
| 19/01/2023 | Annual Review | New hazardous and dangerous goods register and maps added. Update personnel and contact details. Incident flowchart and risk matrix added. | | 14/03/2023 |
| 14/03/2024 | Annual Review | Staff names and contact details updated, Update references to other Council policies/procedures (new reference numbers etc), Review list of hazardous and dangerous goods, Update list of safety equipment | | 27/03/2025 |

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|------------|---------------|--|------------|
| 24/03/2025 | Annual Review | Updates to legislation, staff names and contact details, update stockpile details for tyres, review list of hazardous and dangerous goods, update contact number for emergency services, update PIRMP flowchart display sheet. | 27/03/2026 |
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