



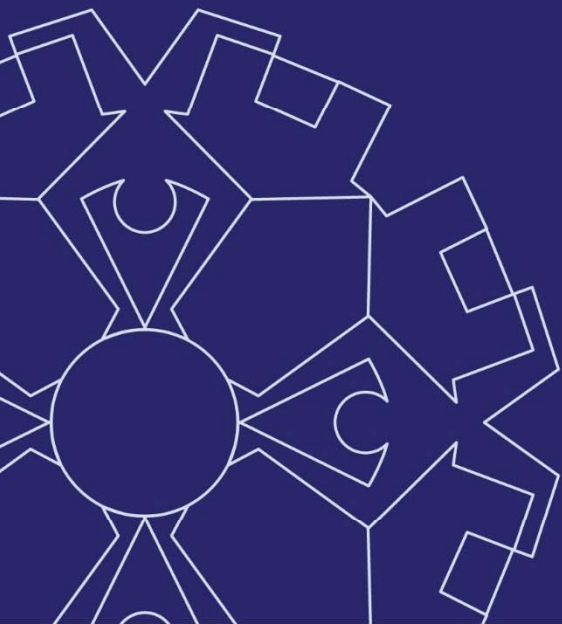
GEOLYSE

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN DUBBO REGIONAL LIVESTOCK MARKETS

SUPPORTING STATEMENT

**PREPARED FOR
DUBBO REGIONAL COUNCIL**

NOVEMBER 2017



• Civil, Environmental & Structural Engineering • Surveying • Environmental • Planning • Architecture

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Foreword

This is the Supporting Statement for the *Pollution Incident Response Management Plan* (PIRMP). The PIRMP is a functional document. It is designed to assist personnel at the Dubbo Regional Livestock Markets to correctly identify pollution incidents and detail the procedures for the response and reporting of a pollution incident.

The structure and scope of this Supporting Statement and PIRMP reflects the requirements of the Environment Protection Authority's *Guidelines: Preparation of pollution incident response management plans*, March 2012 and in doing so embodies the principles of best practice environmental management.

Utilisation of this PIRMP aims to improve, monitor and demonstrate environmental performance. If you have any suggestions for amendments, additions or improvements, please discuss these with the Saleyards Manager.

.....
Natasha Comber

Director Economic and Business

Date:

Introduction

1.1 PURPOSE

This supporting statement and Pollution Incident Response Management Plan (PIRMP) have been prepared in accordance with the Protection of the Environment Operations Act 1997 (POEO Act) and reflects the requirements specified in the Environment Protection Authority's (EPA's) *Guidelines: Preparation of pollution incident response management plans*, March 2012.

The PIRMP details:

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

1.2 DEFINITION OF POLLUTION INCIDENT

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act 1997:

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

1.3 IDENTIFIED POLLUTION RISKS

The primary potential risks to human health or the environment associated with the activity undertaken at this site include the following:

- Failure of the surface water management system;
- Failure of the effluent system;
- Failure of the irrigation system;
- Failure of environmental controls in the manure stockpile area;
- Fire;
- Chemical spill;
- Mass stock death event;
- Emergency disease outbreak;
- Vandalism, activist action or target of terrorist activity; or
- Off-site uncontrolled stock movement.

The facility already has in place measures that manage and report on some of the above potential risks. As such, not all of the potential risks listed above are included this PIRMP.

Site Overview

2.1 SITE OVERVIEW

Dubbo Regional Council (Council) own and operate the Dubbo Regional Livestock Markets (DRLM), a livestock sale facility located on Boothenna Road approximately five kilometres north of Dubbo in central NSW. Occurring on flat country to the east of the Macquarie River and south of the Talbragar River, the property occupies an area of 38.92 hectares. The location of the DRLM is shown on **Figure 1**.



Figure 1 DRLM Location

DRLM commenced operations as the Troy Saleyards in 1950 at its current site on Boothenna Road, Dubbo. Since commencing operations, the DRLM have become a major livestock marketing facility, and is recognised as the largest saleyards in the nation in terms of combined sheep and cattle throughput.

The DRLM operate to a detailed Safety Management System that ensures policies and procedures are up to date and safe work systems are adopted by all who access and/or operate at the Site.

The Environment Protection Authority (EPA) has issued Environment Protection Licence 3702 (EPL 3702) in accordance with Section 5.7 of the Protection of the Environment Operations Act 1997 for the DRLM site.

The facility includes:

- Administration building
- Selling pens for cattle, goats and sheep
- Resting paddocks
- A covered selling ring
- Public canteen
- Leased offices
- Water for stock
- Hay sheds
- Light vehicle wash bay
- Three-bay computerised truck washing facility
- Public Toilets
- Cattle scales
- Purpose-built cattle drafting facility
- Cattle crushes
- Effluent management system
- Surface water management system
- 12 ha irrigation area

Across 2015 and 2016, construction commenced at the facility for upgrades to the sheep and cattle handling operations, including improved carrying capacity, an additional weighbridge, and 126 additional cattle pens.

The site layout is presented below in **Figure 2**.

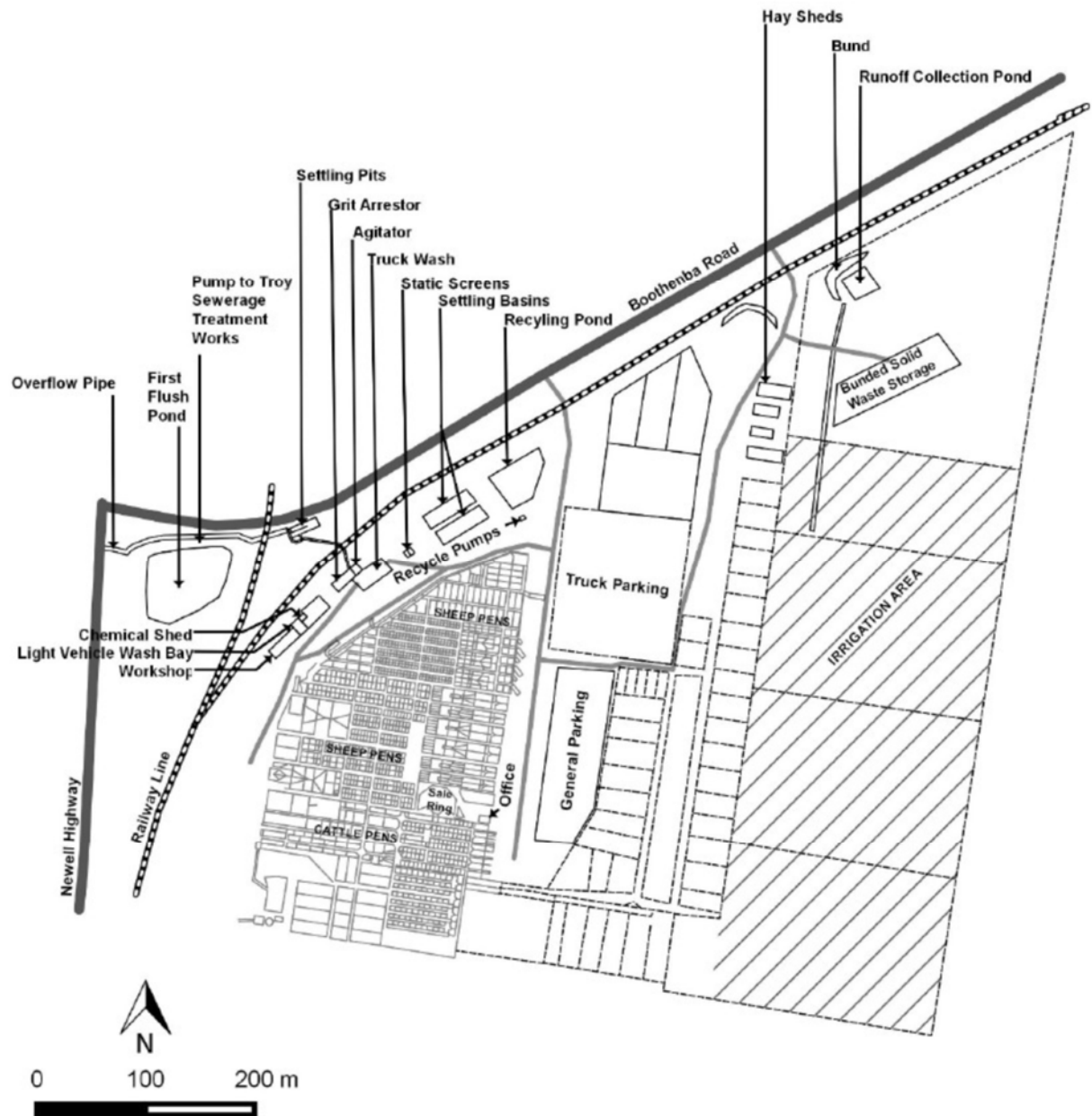


Figure 2 DRLM Site Layout

2.2 SITE CHARACTERISTICS

Site features which require careful environmental management are:

- The proximity to neighbouring properties and residents; and
- The proximity to the Macquarie and Talbragar Rivers.

Figure 3 shows the location of DRLM and general features of the local environment.

The property occupies an area of 38.92 hectares (ha). The Dubbo to Coonamble rail line runs north-south to the east of the first-flush pond, and the Troy Junction to Merrygoen rail line runs along the northern boundary of the site, parallel to Boothenba Road.

The DRLM are situated approximately 1.5 km from north Dubbo off Boothenba Road. The saleyards are located approximately 500 m from the Macquarie River, and surface runoff in excess of the surface water management system capacity would flow to the Macquarie River. The Talbragar River is located approximately 1.2 km to the north of the facility.

The saleyards are surrounded by industrial development including agricultural industries, sewage treatment plant, sheep abattoir, wool scouring plant and pet food plant. It is bordered on the western and northern sides by the aforementioned railway lines.

The nearest residential dwellings are approximately 250 metres south-west of the saleyards.

The effluent irrigation area is located to the east of the complex on relatively flat terrain. The irrigation area incorporates upslope diversion drains and a tailwater collection system.

2.3 SITE SUPERVISION AND CONTROL

The Saleyards Manager (or Assistant Saleyards Manager in the absence of the Saleyards Manager) is responsible for overall day to day management of the facility.

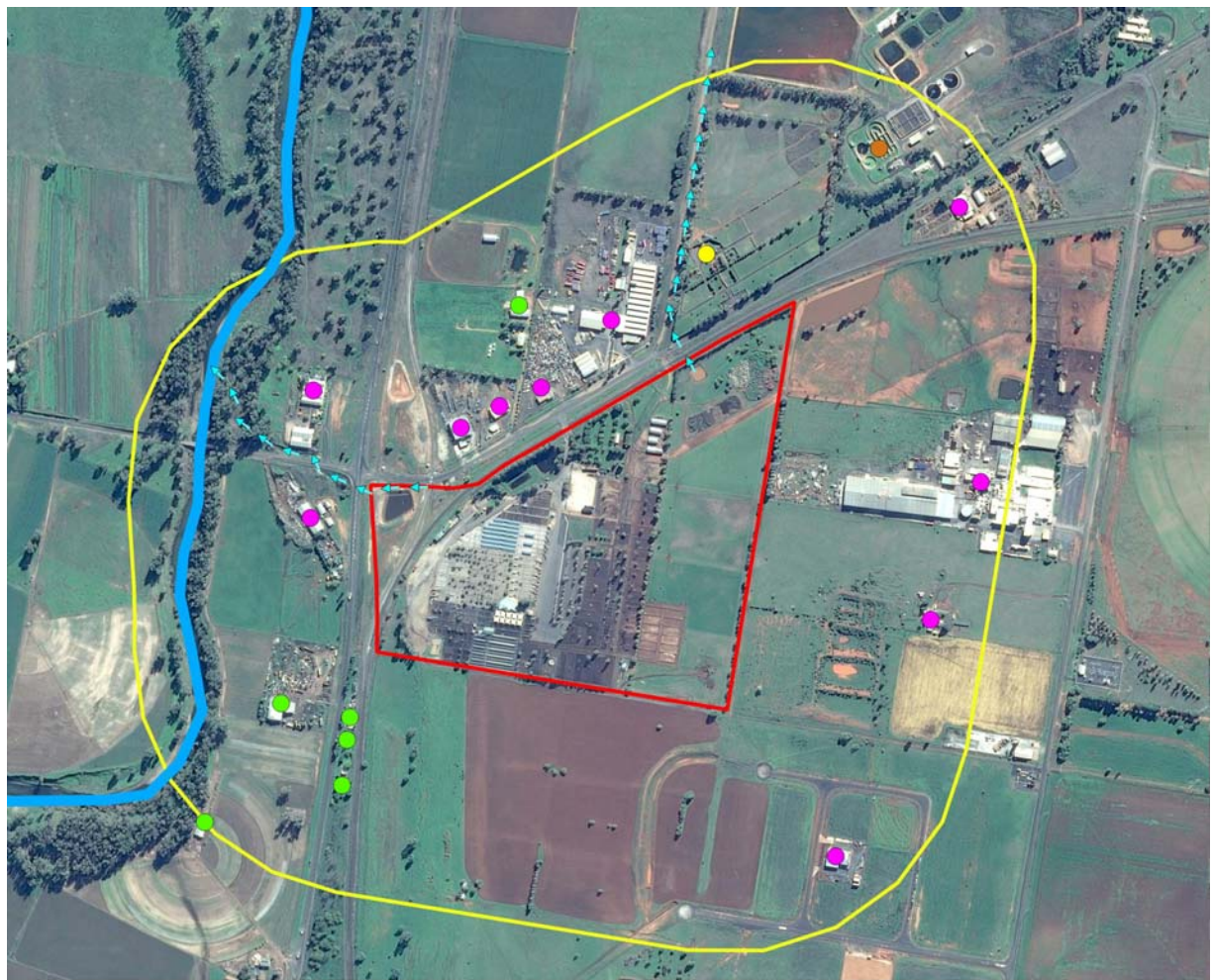
The saleyards are open 24 hours a day and are staffed from 7:00 am to 4:00 pm weekdays. A security patrol operates between 6:00 pm to 6:00 am except on Christmas Eve, Christmas Day and Good Friday. Inspections are made at 7:30 am on Saturday and Sunday. The site has CCTV operating with the central recording hub located in the office.

The property is fully secured with perimeter stock fencing except for a gate at the main entry to the facility. All movement of incoming and outgoing vehicles, machinery and equipment is controlled by marked roadways and signage.









2.4 SITE SAFETY EQUIPMENT

The site maintains the following safety equipment:

- Fire extinguishers at strategic locations and high pressure wash down hoses;
- A front end loader that can be used to smother fires if required;
- PPE for operational activities which includes safety goggles, dust masks, respirator face masks and protective gloves; and
- Emergency Response Plan.



Legend

- | | |
|---|--|
|  Boundary |  Crematorium |
|  500m Offset from Boundary |  Sewage Treatment Plant |
|  Overflow to River |  Industrial |
|  Macquarie River |  Residential |

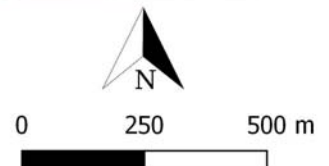


Figure 3 Site Environmental Setting

Risk Management and Pre-emptive Actions

3.1 INTRODUCTION

The following section outlines current operational procedures and design intended to minimise and manage risk. Members of staff working on-site are responsible for being aware and notifying the Saleyards Manager of any potential pollution incidents on the premises. All management procedures detailed within the Dubbo Regional Livestock Markets Environmental Management Plan (EMP) must be adhered to.

3.2 PRE-EMPTIVE ACTIONS

3.2.1 ENVIRONMENTAL MANAGEMENT PLAN

The DRLM is managed to minimise adverse impacts on the environment and in such a manner that an acceptable level of environmental performance is consistently achieved. The procedures to achieve this are defined in the EMP.

3.2.2 LIQUID WASTE MANAGEMENT

3.2.2.1 Surface Water Management System

Surface runoff from the complex is collected in a system of open drains which drain to northern site boundary.

Stormwater runoff passes through the truck wash grit arrestor, beneath the Troy Junction-Merrygoen railway line to settling pits, then to a 8.5 ML first flush holding pond. When the holding pond is full, runoff bypasses the pond and discharges beneath the Newell Highway to eventually reach the Macquarie River to the west of the facility.

3.2.2.2 Yard Wash Down

The yards are cleaned weekly using high pressure hoses fed by recycled water. Wash down water passes through the solids removal system and returns to the recycled water system.

All surface runoff generated by the wash down of the yard surface is collected in an agitator pit and then is pumped over static wedge wire screens for solids separation. The treated effluent flows to a settling basin and recycle pond for reuse in the wash down process.

3.2.2.3 Truck Wash

The truck wash facility provides an area for transport operators to wash down trucks after delivering stock to the markets. The facility consists of:

- a high pressure hose supplied with fresh water;
- concrete grit arrestor;
- agitator pit to keep solids in suspension; and
- static wedge wire screens for solids separation.

Wash down water containing solids passes through the grit arrestor and into the agitator pit from where it is pumped over static screens. Screened effluent is directed to two settling basins and then a recycle pond from where it is reused for yard wash down or irrigation.

3.2.2.4 Water Recycling

Recycled water is used for yard wash down to reduce the fresh water demands of the facility. Wash down water passes through the truck wash treatment system for solids removal ending up in the recycling pond from where it may be reused for yard wash down.

The recycle system receives fresh water introduced from the truck wash which replaces water extracted from the system for irrigation. This process maintains sufficient quality.

Additional make-up water is sourced from the river water supply if required

3.2.2.5 Irrigation System

A quantity of effluent is extracted from the recycling system and used for irrigation of permanent pastures. The volume irrigated is approximately equal to the amount used through the truck wash.

The facility has approximately 12 hectares available for irrigation. The irrigation area incorporates up slope diversion drains and a tailwater storage.

The volume of water recycled for yard wash down or irrigation is recorded during each irrigation event.

3.2.3 SOLID WASTE MANAGEMENT

Solids wastes are collected from:

- surface water drains;
- sedimentation basins;
- the agitator pit; and
- static screens.

Solid wastes go to a bunded drying area from where they are collected by commercial operators, residents for private use and/or Council for use on municipal parks and gardens. Excess solids are removed to Whylandra Waste Disposal Depot. Volumes of solid waste removed from the DRLM are recorded.

3.2.4 ENVIRONMENTAL MONITORING

3.2.4.1 Description

Environmental monitoring is undertaken in accordance with EPL 3702 conditions and includes irrigated effluent quality and volume, and soil quality monitoring.

3.2.4.2 Soils

One top-soil sample and one sub-soil sample are collected annually from the irrigation area. The samples are analysed for total soluble salts (salinity).

The location of irrigation paddocks and their paddock reference number is shown on **Figure 4**.

3.2.4.3 Liquid Waste Water Volumes

The volume of liquid waste water pumped to the irrigation area is recorded and reported to the EPA annually.

3.2.4.4 Effluent

A representative sample of the liquid waste water used for irrigation is collected within 60 days prior to the end of the reporting period from the recycling pond. The location of the sampling point is shown on **Figure 4**.

The waste water sample is analysed for:

- Biochemical oxygen demand;
- Conductivity;
- Phosphorus (total);
- Nitrate & nitrate (oxidised nitrogen); and
- Nitrogen (ammonia).

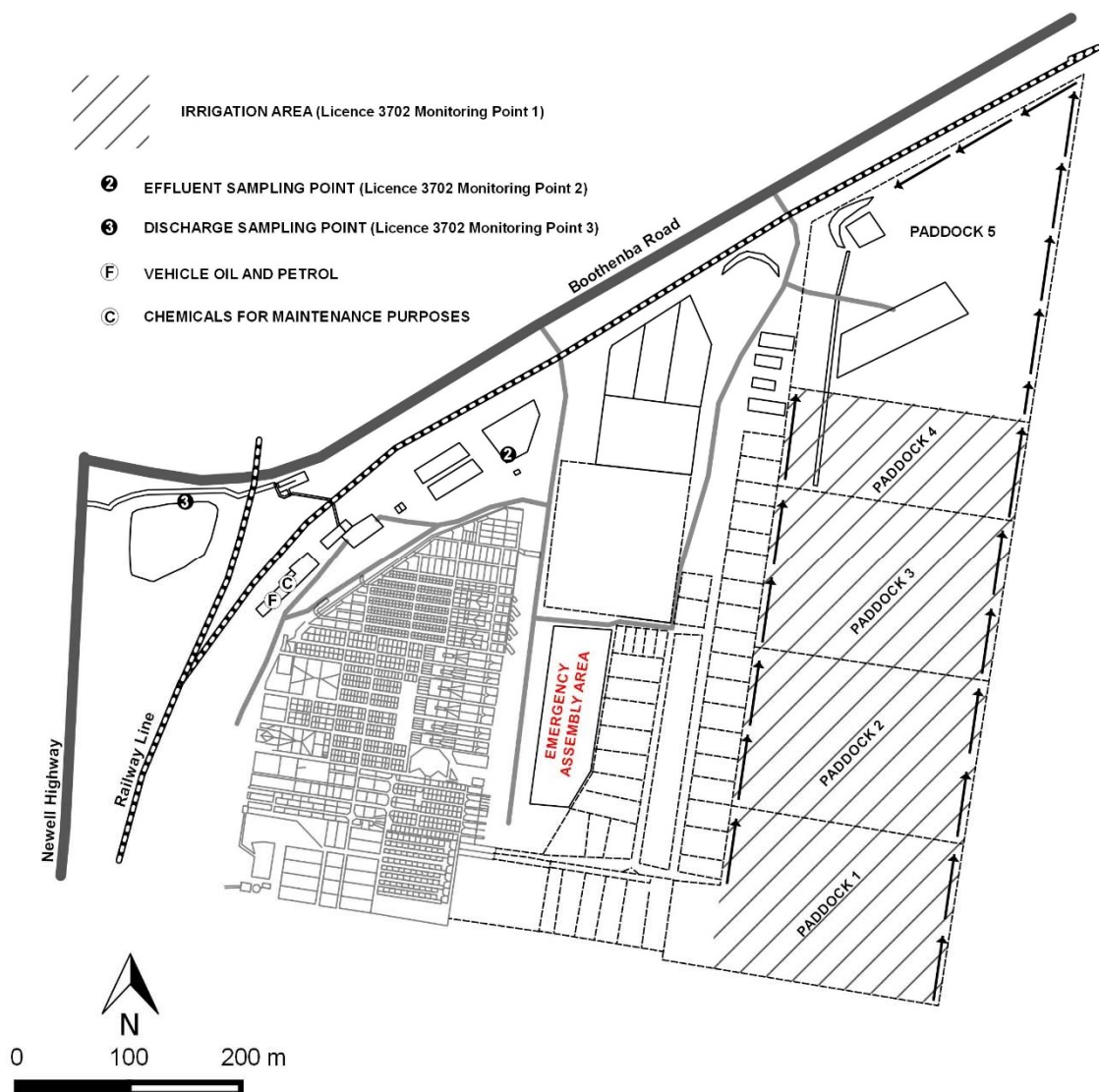


Figure 4: Monitoring Points and Potential Pollutant Storage Locations

3.2.5 DEAD STOCK MANAGEMENT

The following actions are undertaken in the event of dead stock:

- Immediate action will be taken to remove the dead stock by loading onto tipping trailer and covering for transport to Whylandra Waste Disposal Depot for disposal;

- The Saleyards Manager will ensure that the appropriate saleyards staff member records the location, description, tail tag number, owner and number of dead stock on **Form 3.3C – Dead Stock Register** contained within the EMP (Section 3.3); and
- In the event of mass stock death or notifiable disease, the Saleyards Manager will refer to the Biosecurity Management Plan contained within Appendix C of the EMP to determine the appropriate management strategy.

3.2.6 FIRE

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

- Site control and supervision to prevent unauthorised access;
- Maintaining machinery in good working order to minimise risk of sparks;
- Storing hay in shed isolated from main activities;
- Managing manure stockpiles;
- Regular site patrols; and
- Having access to on-site fire-fighting equipment which includes fire extinguishers and high pressure wash down hoses throughout the facility.

3.2.7 CHEMICAL SPILL

The facility maintains chemicals in quantities required for routine maintenance. These chemicals are stored in secured, bunded enclosed sheds. Only ChemCert accredited staff are permitted to handle and transport chemicals. Minimal volumes of agronomic chemicals are stored on the premises as these activities are contracted.

3.2.8 MASS STOCK DEATH AND NOTIFIABLE DISEASE

3.2.8.1 Description

Council has a Biosecurity Management Plan (contained within Appendix C of the EMP) in place for mass stock death and notifiable disease.

3.2.8.2 Risk Management

Notification of relevant authorities in the event of a mass stock death event or notifiable disease is managed by the Biosecurity Management Plan. Therefore mass stock death and notifiable disease are not considered to be incidents that require notification under this PIRMP.

3.2.9 VANDALISM OR TERRORIST ATTACK

The property is fully secured with perimeter stock fencing except for a gate at the main entry to the facility.

The saleyards are open 24 hours a day and are staffed from 7:00 am to 4:00 pm weekdays. A security patrol operates between 6:00 pm to 6:00 am except on Christmas Eve, Christmas Day and Good Friday. Inspections are made at 7:30 am on Saturday and Sunday. The site has CCTV operating with the central recording hub located in the office.

All staff are required to be vigilant and aware that the site is a potential target for vandalism, particularly by animal rights activists.

3.2.10 OFF-SITE UNCONTROLLED STOCK MOVEMENT

3.2.10.1 Description

Large numbers of stock are present on sales days each week. There is the potential that stock could escape from pens and leave the premises causing nuisance on other land.

Mitigating factors are that stock are generally penned in small numbers, there are numerous fences within the saleyards complex, there are many people (staff, agents, truck drivers) present on sales days and the site has a perimeter fence. The main site entry point is the only means of stock escape without damage to fencing infrastructure.

3.2.10.2 Risk Management

The potential for significant numbers of stock to move off-site is considered to be low due to small pen numbers and the perimeter fencing.

Therefore off-site stock movement is not considered to be an incident that requires notification under this PIRMP.

3.3 INVENTORY OF CHEMICALS AND POLLUTANTS

The following chemicals can be stored on-site in quantities required for routine maintenance necessary for operations at the facility:

- Roundup (minor quantity as major weed control work is contracted); and
- Automotive oils and fluids.

Figure 4 identifies where these chemicals are stored on the premises.

3.4 POTENTIAL POLLUTION INCIDENTS

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

- Failure of the surface water management system;
- Failure of the effluent system;
- Failure of the irrigation system;
- Failure of environmental controls in the manure stockpile area;
- Fire;
- Chemical spill; or
- Vandalism, activist action or target of terrorist activity.

3.5 LIKELIHOOD, IMPACT AND CONTRIBUTING FACTORS TO POLLUTION INCIDENTS OCCURRING

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

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

The following assessment of potential pollution incidents detailed below is summarised in **Table 1.1 of Appendix A**.

3.5.1 FAILURE OF SURFACE WATER MANAGEMENT SYSTEM

Low Likelihood – the surface water management system has been designed and constructed in accordance with best practice. The majority of the system is constructed below surrounding ground levels and the chance of an embankment failure causing a large uncontrolled effluent discharge is considered to be low. The system is inspected daily as part of the **Form 3.2 – Daily Environmental Checklist** (contained within Section 3.2 of the EMP).

Medium Impact – the site is close to the Macquarie River to the west and Talbragar River to the north. Any uncontrolled discharge from the facility would move along existing drainage lines and reach the receiving bodies in a reasonably short timeframe.

Contributing Factors – prolonged periods of wet weather; poor management of the first flush pond leading to it exceeding its design capacity (i.e. discharge in excess of the design criteria); and insufficient inspection and maintenance of surface water systems.

3.5.2 FAILURE OF THE EFFLUENT SYSTEM

Low Likelihood – the effluent management system has been designed and constructed in accordance with best practice. The majority of the system is constructed below surrounding ground levels and the chance of an embankment failure causing a large uncontrolled effluent discharge is considered to be low. The system is inspected daily as part of the **Form 3.2 – Daily Environmental Checklist** (contained within Section 3.2 of the EMP).

Medium Impact – the site is close to the Macquarie River to the west and Talbragar River to the north. Any uncontrolled discharge from the facility would move along existing drainage lines and reach the receiving bodies in a reasonably short timeframe.

Contributing Factors – prolonged periods of wet weather; and insufficient inspection and maintenance of effluent management systems.

3.5.3 FAILURE OF THE IRRIGATION SYSTEM

Low Likelihood – the irrigation system consists of below ground piping and a travelling irrigator that is subject to regular inspection during operation. If a pipe burst, or irrigator stopped moving (causing water to pond) it would be rectified during these regular inspections.

Medium Impact – the site is close to the Macquarie River to the west and Talbragar River to the north. Any uncontrolled discharge from the facility would move along existing drainage lines and reach the receiving bodies in a reasonably short timeframe.

Contributing Factors – prolonged periods of wet weather; and insufficient inspection and maintenance of irrigation systems.

3.5.4 FAILURE OF CONTROLS AT MANURE STOCKPILE

Low Likelihood – the manure stockpile is constructed in an area of deep clay and is fully surrounded by an earth bund. Manure is regularly removed. The stockpile site is inspected weekly.

Medium Impact – the site is close to the Talbragar River to the north. Any uncontrolled discharge from the facility would move along existing drainage lines and reach the river in a reasonably short timeframe.

Contributing Factors – prolonged periods of wet weather may increase the risk; poor manure stockpile management; large quantities of manure; insufficient inspection and maintenance of control systems.

3.5.5 FIRE

Medium Likelihood – the likelihood of fire in the saleyards complex is extremely low due to the lack of combustible materials and relatively moist environment. There is a medium risk of fire in the hay shed area through either self-combustion or arson. There is a low likelihood of the facility being impacted by bush fire.

Low Impact – fire is unlikely to cause a significant release of pollutants to the environment (other than smoke). Fire is unlikely to significantly spread within a short timeframe, and would not affect the effluent system or necessarily cause a discharge from the surface water system.

Contributing Factors – prolonged periods of dry hot weather may increase the risk; poor commodity management.

3.5.6 CHEMICAL SPILL

Low Likelihood – all potential chemicals of concern are stored in appropriately secure and bunded areas and handled in accordance with ChemCert practices.

Low Impact – chemicals are stored in a bunded shed with concrete floor. Chemical Spill kits are available and staff are ChemCert accredited. Only small quantities are stored on site.

Contributing Factors – improper storage of chemicals; human error; vandalism.

3.5.7 VANDALISM, ACTIVIST ACTION OR TERRORISM

Low Likelihood – although the site is of limited strategic value as a potential target for terrorism, the premises may prove attractive to animal activists or arsonists.

Medium Impact – any actions against the operations are unlikely to cause significant environmental harm as they would potentially only relate to fire; release of stock, or mass stock death. Elements relating to effluent or surface water movement are identified in the plan to have medium impacts.

Contributing Factors – increased risk during hours of closure and during sustained periods of hot and dry weather for fire attack.

PIRMP

4.1 DEFINITION OF POLLUTION INCIDENT

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act 1997:

- (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.*

4.2 NOTIFICATION OF POLLUTION INCIDENT

4.2.1 NOTIFICATION SPEED OF RESPONSE

Notification of a pollution incident must occur "immediately", as specified in Section 148 of the POEO Act 1997, however actions that are necessary to make the area safe are permitted prior to notification.

4.2.2 NOTIFICATION OF RELEVANT AUTHORITIES

Where a pollution incident causes or threatens material harm to the environment or human health, all of the following authorities / stakeholders must be notified by the Manager Saleyards & Showground or Saleyards Operations Coordinator:

Table 4.1 – Notification of Relevant Authorities

1.	Emergency Services	000*
* The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire and Rescue via a local telephone number.		
2.	The Environment Protection Authority (EPA) Dubbo Regional Office	131 555 (24 hours) 02 6883 5333
3.	NSW Public Health Dubbo Office (Dubbo Base Hospital)	02 6809 8963 02 6885 8666 or 0418 866 397 (Officer on call)
4.	Dubbo Regional Council	02 6801 4000 (diverts after-hours)
5.	SafeWork NSW Dubbo Office	13 10 50 02 6841 7900
6.	Fire and Rescue NSW Orana Rural Fire Service	02 6884 7447 02 6881 3900
If there is no immediate threat to human health and/or property (i.e. a combat agency is not required), the Saleyards Manager is still required to follow notification procedures outlined above with the exception of emergency services (000).		

A summary of the above pollution incident notification procedure is provided in Document A – Pollution Incident Decision Flow Chart in **Appendix A**

4.2.3 INFORMATION TO BE NOTIFIED

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

- a) *the time, date, nature, duration and location of the incident,*
- b) *the location of the place where pollution is occurring or is likely to occur,*
- c) *the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,*
- d) *the circumstances in which the incident occurred (including the cause of the incident, if known),*
- e) *the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,*
- f) *other information prescribed by the regulations.*

Notification is required by the Manager Saleyards & Showground or Saleyards Operations Coordinator immediately after a pollution incident becomes known. Any information required that is not known at the time the incident is notified must be provided when it becomes known.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.

A Pollution Incident Reporting Form is produced in **Appendix A** to assist in correctly recording and notifying the relevant authorities detailed in **Section 4.2.2** above.

4.3 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

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

In the case of a fire, and where safe, attempts must be made to extinguish or contain the fire immediately.

In the event of a chemical spill that is not contained by bunding, the chemical spill kits must be used to restrict the spread of the chemical.

Earthworks should be used to contain surface water discharge as far as practicable.

4.4 MINIMISING HARM TO PERSONS ON THE PREMISES

In the event of a pollution incident occurring, all site staff will be contacted by mobile phone. A public announcement system also exists at the facility for use during sale days.

All staff and visitors will be mustered by DRLM site staff to the Emergency Assembly Point located in the car park (identified on **Figure 4**), after which they will be safely evacuated from the site where appropriate. It is a condition of entry that in the event of an emergency, both the public and staff must adhere to directions given by the Saleyards Manager.

4.5 EPA POWERS OF DIRECTION & NOTIFICATION OF NEIGHBOURS

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with **Section 4.2**.

Once the EPA is notified, it is then for the EPA to determine whether surrounding neighbours of the site need to be contacted and informed of the circumstances of the incident and what action is being taken in response to it. If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site.

Irrespective of whether the EPA directs Council to notify neighbours and depending on the circumstances of the particular pollution incident, Council may at their own discretion voluntarily choose to notify neighbours.

Council would notify neighbours by 'door knocking' every neighbouring property identified on **Figure 3**.

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

4.6 IDENTIFICATION OF NEIGHBOURS

To assist the EPA in its decision as to whether it needs to direct Council to notify neighbours and to assist Council in visiting all necessary local neighbours, the aerial plan in **Figure 3** identifies the properties within 500 m of the site boundary.

Implementation

5.1 EMP

The PIRMP forms part of the Dubbo Regional Livestock Markets EMP.

If Dubbo Regional Council should choose to file the PIRMP and the Supporting Statement in any other document, it must be readily identifiable in that document in order to meet the requirements of Section 153C of the POEO Act (1997) and Regulations (2009).

5.2 STAFF TRAINING

New members of staff at the facility should be inducted. This induction must cover the purpose, requirements and responsibilities detailed in this PIRMP.

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

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

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

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

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

5.3 REVIEW AND UPDATE PIRMP

The PIRMP is a living document required to be reviewed, tested and updated at least once every 12 months, and within one month of any pollution incident occurring to ensure accuracy and effectiveness.

For these reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use. Details of the version and date of issue are recorded on each page of the PIRMP in the bottom left hand corner.

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

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

- Saleyards Manager, Dubbo Regional Council;
- Administration Manager, Dubbo Regional Council; and
- Geolyse Pty Ltd, Orange.

References

Environmental Guidelines: Preparation of Pollution Incident Response Management Plans, March 2012 – prepared by Environment Protection Authority

Environment Protection Licence 3702 – prepared by Environment Protection Authority

Appendix A

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



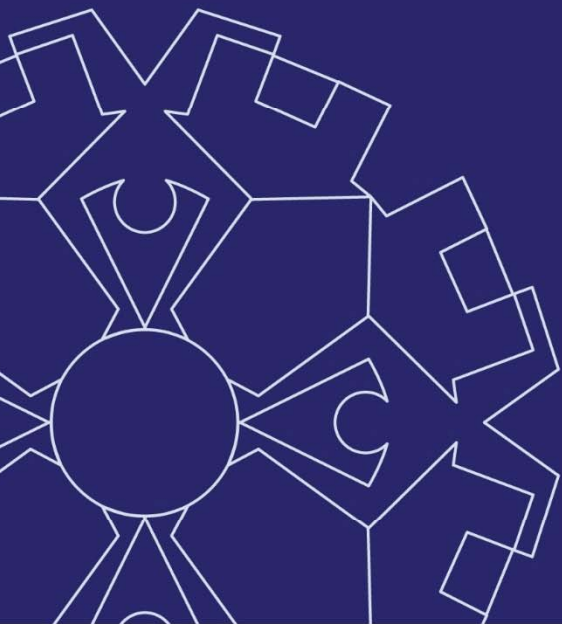
GEOLYSE

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

DUBBO REGIONAL LIVESTOCK MARKETS

PREPARED FOR
DUBBO REGIONAL COUNCIL

NOVEMBER 2017



• Civil, Environmental & Structural Engineering • Surveying • Environmental • Planning • Architecture

**POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN**
DUBBO REGIONAL LIVESTOCK MARKETS

PREPARED FOR:
DUBBO REGIONAL COUNCIL

NOVEMBER 2017



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Report Title:	<i>Pollution Incident Response Management Plan</i>
Project:	<i>Dubbo Regional Livestock Markets</i>
Client:	<i>Dubbo Regional Council</i>
Report Ref.:	<i>214381_PIRMP_002_DRLM.docx</i>
Status:	<i>Final – Version C</i>
Issued:	<i>November 2017</i>

Geolyse Pty Ltd and the authors responsible for the preparation and compilation of this report declare that we do not have, nor expect to have a beneficial interest in the study area of this project and will not benefit from any of the recommendations outlined in this report.

The preparation of this report has been in accordance with the project brief provided by the client and has relied upon the information, data and results provided or collected from the sources and under the conditions outlined in the report.

All information contained within this report is prepared for the exclusive use of Dubbo Regional Council to accompany this report for the land described herein and are not to be used for any other purpose or by any other person or entity. No reliance should be placed on the information contained in this report for any purposes apart from those stated therein.

Geolyse Pty Ltd accepts no responsibility for any loss, damage suffered or inconveniences arising from, any person or entity using the plans or information in this study for purposes other than those stated above.

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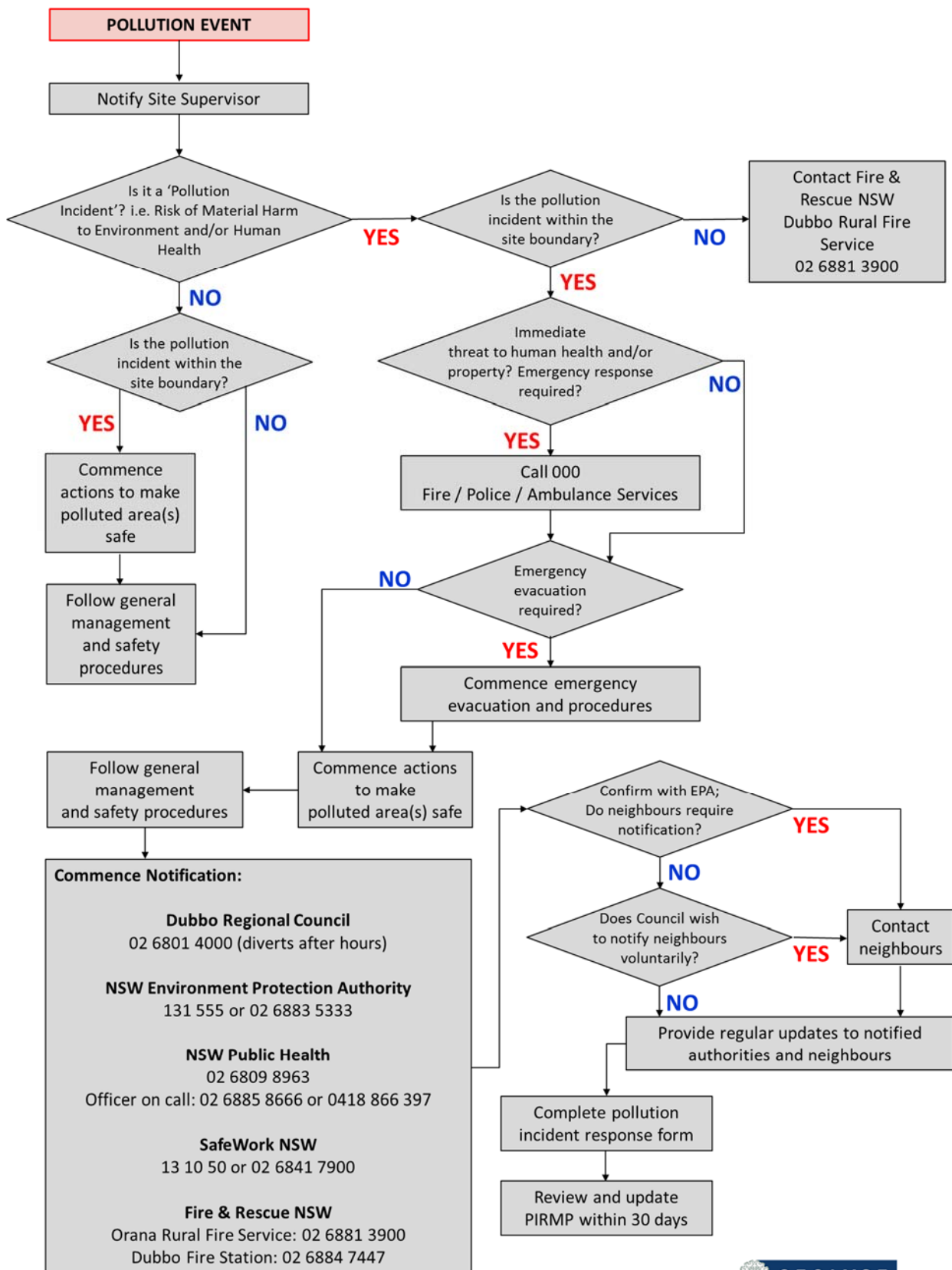
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Pollution Incident Classification, Risk Assessment and Contributing Factors

Table 1.1 – Pollution Incident Classification, Risk Assessment and Contributing Factors

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Failure of surface water management system	Low	Medium	Prolonged periods of wet weather; poor management of the first flush pond leading to it exceeding its design capacity (i.e. discharge in excess of the design criteria); and insufficient inspection and maintenance of surface water systems
Failure of the effluent system	Low	Medium	Prolonged periods of wet weather; and insufficient inspection and maintenance of effluent management systems
Failure of irrigation system	Low	Medium	Prolonged periods of wet weather; and insufficient inspection and maintenance of irrigation systems
Failure of controls at manure stockpile	Low	Medium	Prolonged periods of wet weather may increase the risk; poor manure stockpile management; large quantities of manure; insufficient inspection and maintenance of control systems
Fire	Medium	Low	Prolonged periods of dry hot weather may increase risk; poor commodity management
Chemical spill	Low	Low	Improper storage of chemicals; human error; vandalism
Vandalism, activist action or terrorism	Low	Medium	Increased risk during hours of closure and during sustained periods of hot and dry weather for fire attack

Pollution Incident Decision Flow Chart



Pollution Incident Emergency Contact Details

3.1 DEFINITION OF POLLUTION INCIDENT

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act 1997:

- (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.*

3.2 NOTIFICATION OF POLLUTION INCIDENT

3.2.1 NOTIFICATION SPEED OF RESPONSE

Notification of a pollution incident must occur "immediately", as specified in Section 148 of the POEO Act 1997, however actions that are necessary to make the area safe are permitted prior to notification.

3.2.2 NOTIFICATION OF RELEVANT AUTHORITIES

Where a pollution incident causes or threatens material harm to the environment or human health, all of the following authorities / stakeholders must be notified by the Saleyards Manager or Assistant Saleyards Manager:

Table 3.1 – Notification of Relevant Authorities

1.	Emergency Services	000*
* The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire and Rescue via a local telephone number.		
2.	The Environment Protection Authority (EPA) Dubbo Regional Office	131 555 (24 hours) 02 6883 5333
3.	NSW Public Health Dubbo Office (Dubbo Base Hospital)	02 6809 8963 02 6885 8666 or 0418 866 397 (Officer on call)
4.	Dubbo Regional Council	02 6801 4000 (diverts after-hours)
5.	SafeWork NSW Dubbo Office	13 10 50 02 6841 7900
6.	Fire and Rescue NSW Orana Rural Fire Service	02 6884 7447 02 6881 3900

If there is no immediate threat to human health and/or property (i.e. a combat agency is not required), the Saleyards Manager is still required to follow notification procedures outlined above with the exception of emergency services (000).

Pollution Incident Reporting Form

INCIDENT NO:

TIME:

DATE:

DURATION OF INCIDENT:

NATURE OF INCIDENT:

TEMPERATURE: °C

WIND DIRECTION & SPEED: KM/HR

RELATIVE HUMIDITY:%

RAINFALL SINCE 9AM: MM

FIRE DANGER RATING:

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

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

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

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

Pollution Incident Reporting Form

NOTIFICATION:		
STAKEHOLDER	DATE / TIME	CONTACT
DUBBO REGIONAL COUNCIL	/ / AM/PM	
NSW ENVIRONMENT PROTECTION AUTHORITY	/ / AM/PM	
NSW PUBLIC HEALTH	/ / AM/PM	
SAFework NSW	/ / AM/PM	
NSW FIRE AND RESCUE	/ / AM/PM	

NOTIFICATION OF NEIGHBOURS REQUIRED BY EPA	Yes / No
IF NOT, HAVE NEIGHBOURS BEEN NOTIFIED VOLUNTARILY	Yes / No
PARTICULARS:	
.....	
.....	
.....	

SIGNATURE:	DATE / /
SIGNATURE:	DATE / /
SALEYARDS MANAGER	

PIRMP Testing and Update Register

Date	Name	Routine Testing	Routine Update	Post Incident Updates	New Copies Distributed?
18/12/14	Chloe Bigg (Geolyse)	N/A	Content updated to reflect updates to DRLM and link to the updated DRLM EMP.	N/A	Yes
13/05/15	Chloe Bigg (Geolyse)	N/A	Figures 2 and 4 updated to reflect current site layout.	N/A	Yes
18/10/17	Brendan Stuart (Geolyse)	N/A	Updates to contact details and site layout	N/A	Yes

Staff Training Register

Date	Staff Member	Brief Description of Training Task
/ /		
/ /		
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/ /		
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