NEW SOIL
SOIL RECYCLING

MANAGEMENT PROCEDURE
WMP01

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP) FOR A SOIL RECYCLING FACILITY - OLD TREATMENT WORKS LANE, COOTAMUNDRA, NSW

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REVISION AND AMENDMENT

Document Title	Date Issued	Author/Reviewer	Organisation	Details
913101_PIRMP_V1	29 November 2013	Zoe Wyllie/Nicole Cheung	Environmental Earth Sciences NSW	Separation of PIRMP from EMP document
913101_PIRMP_V2	29 May 2014	Ross Williams	Environmental Earth Sciences International	Amendments to align with EPA variation of EPL conditions
913101_PIRMP_V3	29 May 2015	Ross Williams	Waste Science	Amendments to align with organisational changes
616009_PIRMP_V4	7 June 2016	Kelly Golmayer	Waste Science	Amendments to align with organisational changes and review of contents
617009_PIRMP_V5	14 June 2017	Chris Conoley	Centre for Contaminant Geoscience	Amendments to align with organisational changes
WMP01 PIRMP	24 October 2019	Kylie Saare	Environmental Earth Sciences International	New naming convention (in line with IMS), rebranding and amendments to align with organisational changes
WMP01 PIRMP (7)	05 February 2020	Adam Gammon	New Soil	Amendments to align with organisational and operational changes
WMP01 PIRMP (8)	05 March 2020	Kylie Saare	Environmental Earth Sciences International	Change to Risk Matrix & Incident Response Flowchart
WMP01 PIRMP (9)	25 March 2022	Kylie Saare / Adam Gammon	EES International / New Soil	Updates to staff contacts
WMP01 PIRMP (10)	13 May 2022	Ty Wickham/ Adam Gammon	New Soil	Update staff and addition of Dam failure 10.4
WMP01 PIRMP (11)	7 October 2022	Ty Wickham/ Adam Gammon	New Soil	Addition of heavy rain event/flooding in conjunction with EPA licensee recommendations
WMP01 PIRMP (13)	03 July 2024	Adam Gammon/ Ty Wickham	New Soil	Amendments to align with organizational changes Amended 10.3 as it specified process conditions on source sites outside of New Soil. Addition of Climate change in 10.4 as these events are most affected. Figure 2: Site layout updated with reviewed version Incident response management plan updated to reflect organizational changes
WMP01 PRIMP (14)	11 July 2025	Adam Gammon / Ty Wickham	New Soil	Update council name, review contaminants of concern.

TABLE OF CONTENTS

FIGURES

APPENDICES

1 INTRODUCTION

This document has been created to fulfill the requirements of Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO 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*. 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 noise"

Under the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans (PIRMP)) Regulation 2012, the plan is to be made readily available to and authorized officer on request and at the premises to any person who is responsible for implementing the plan.

In addition, the plan is to be made publicly available, via the facility's publicly available website or by hard copy following a written request.

The requirements of this plan are applicable to all on-site activities relating to the remediation works. All subcontractors and suppliers will be bound to comply with the requirements of this plan, as far as they apply to the nature and scope of their work.

2 OBJECTIVES

This PIRMP for the Cootamundra Soil Recycling Facility is a document set out to fulfill the requirements of Part 5.7A of the POEO 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 content of this plan included:

- the procedures to be followed by the licence holder in notifying a pollution incident;
- a detailed description of the action to be taken immediately after a pollution incident to reduce or control pollution; and
- the procedures to be followed for co-coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and the persons through who all communications are to be made.

3 SITE CHARACTERISTICS

3.1 Site description and identification

The site is roughly rectangular in shape and is licensed to treat contaminated soil. The Cootamundra landfill and a sewage treatment plant currently occupy most of the site. Cootamundra Shire Council own the lot of land which is directly north of the sewage plant and west of the landfill and it is in this area where the soil treatment facility is situated.

The site is located approximately 2.5 km south east of the town centre and is predominantly bounded by agricultural paddocks with the sewerage treatment works to the west of site.

Street address:	Old Treatment Works Lane, Cootamundra, NSW
Lot description:	Lot 562 and part of Lot 563 on Deposited Plan 881310
Owner:	Cootamundra Shire Council
Current zoning:	Non- urban
Proposed zoning:	Heavy industrial
Area:	10 ha
Current use:	soil treatment facility licensed under EPL number 13413
Vegetation:	grassland with some trees in north east corner

Figures 1 and 2 show the site location and site layout respectively.

3.2 Industrial/commercial environment

The surrounding land uses are as follows the:

- western edge is bounded by Gundagai Road, one of the main roads entering Cootamundra from the Hume Highway;
- south of the site is the Cootamundra sewage treatment plant (which includes three treatment ponds and an additional large pond south west of the site). The recycling centre and dog pound are also situated south of the site;
- site is bounded to the east by Cootamundra Landfill; and
- northern edge of the site is bounded by an unsealed road with grazing land on the other side.

There are three residential properties within 1 km of the proposed location of the site. One on the western side of Gundagai Road, (100 m to the west of the site) and two on the east of the landfill (approximately 600 m east of the site). These properties are shown on Figure 1.

3.3 Site history

The site history indicates that the site has predominately been used for the purpose of sewage treatment works. The site was previously part of the Old Sewage Treatment Works (OSTW) which was constructed prior to 1944 and was replaced in 1981 by the current infrastructure. Based on aerial photography records, in 1969, the surrounding area was predominately clear and the landfill was evident to the east of site. The aerial photographs indicate that the landfill may have been developed between 1961 and 1969.

4 CONTAMINANTS OF CONCERN AND INVENTORY OF POLLUTANTS

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

This PIRMP addresses the Environment Protection Licence (EPL) Number 13413 and the scheduled activity of contaminated soil treatment. From this scheduled activity, the hazards to human health and the environment have been identified. These include:

- free tars and oils;
- polycyclic aromatic hydrocarbons (PAHs);
- monocyclic aromatic hydrocarbons (MAHs);
- petroleum hydrocarbons (TPHs);
- phenolics such as phenol and creosol;
- heavy metals;

iron cyanide spent oxides.
These pollutants above are unable to be quantified in terms of volume or historic locality; however the location of storage and treatment pads constructed on site for the soil treatment works has been documented.

Additional goods that are stored and/or used on site include:

- domestic quantities of cleaning products located within the Toilet Block on site;
- up to 10,000L of diesel fuel located at the Chemical storage area;
- chemicals used as part of treatment works located within the Organic Treatment Store:
  - urea (up to 2,000kg);
  - superphosphate;
  - EESI 18 surfactant (up to 10,000L);
- chemicals used as odour suppressants located within the Equipment Store:
  - Rusmar Foam (up to 12 x 200L containers);
  - EESI 6 (up to 2,000L);
- chemicals stored on site, however not currently used as part of the remediation process:
  - EESI 7 (up to 20 x 200L containers).

For all chemicals stored on site, a material safety data sheet is stored in the site office and can be accessed by all staff. Figure 2 shows the location of these potential pollutants on site, while, in addition, some fuel will be stored on the back of the utes for mobile refuelling of site machinery. All chemicals stored onsite should be tracked via the Chemical Storage Register.

5 EXPOSURE PATHWAY ASSESSMENT

The material which is proposed to be transported to this site for treatment will most likely be contaminated with total petroleum hydrocarbons (TPH) and polycyclic aromatic hydrocarbons (PAH). This material is expected to be transported from former gasworks sites, former service station sites, road and rail corridors and other contaminated sites.

For the permissible scheduled activity (contaminated soil treatment) at the site, the hazards to human health and the environment have been identified. These include:

- soil pollution;
- water pollution;
- air pollution; and
- pollution as a result of an unexpected material disposed on site.

The following tables (Table 1 to Table 3) assess in detail the foreseeable hazards, the risks to human health and the environment, as well as an exposure pathway assessment summary for the site.

Table 1 provides a framework for scoring risks based on likelihood and severity of the consequence, such as the extent to which a pollution hazard poses to humans and the environment. These have been applied to the foreseeable hazards that could occur on this site as a result of regular operating procedures as listed in Table 2. The allocated severity score will assist in determining the response required for any potential environmental/ pollution/ health incident that may occur on the site.

This assessment has identified that surrounding residents and industries as well as site visitors are unlikely to be exposed to chemicals in the soil or groundwater, however, site personnel may be exposed. Procedures are therefore required to manage this potential and reduce the potential for exposure to this population of future site users.

Table 3 carries out an exposure path assessment to detail the possible exposure paths.

TABLE 1 RISK MATRIX

CONSEQUENCES					
Impact Types	**Insignificant (1)**	**Minor (2)**	**Moderate (3)**	**Major (4)**	**Catastrophic (5)**
Health & Safety	No Injuries / First Aid Treatment	Medical Treatment	Lost Time Injury	Hospitalisation	Fatality / Permanent Disability
Environmental	Minimal impact – contained	Low impact – remediable short term	Medium impact – remediable medium term	Severe impact – remediable long term	Extreme impact – irreversible damage
Financial	Minimal loss	Medium loss	High loss	Major loss	Huge loss

LIKELIHOOD	**Almost Certain (5)** Often occurs / once a week	Moderate (5)	High (10)	High (15)	Catastrophic (20)	Catastrophic (25)
	Likely (4) Could easily happen / once a month	Moderate (4)	Moderate (8)	High (12)	Catastrophic (16)	Catastrophic (20)
	Possible (3) Could happen or known to happen / once a year	Low (3)	Moderate (6)	Moderate (9)	High (12)	High (15)
	Unlikely (2) Hasn't happened yet but could / once every 10 years	Low (2)	Moderate (4)	Moderate (6)	Moderate (8)	High (10)
	Rare (1) Conceivable but only in extreme circumstances / once in 100 years	Low (1)	Low (2)	Low (3)	Moderate (4)	Moderate (5)

Note: Risk scores are developed prior to any control measures being in place.

TABLE 2 HAZARD IDENTIFICATION

Type of Pollution	Hazard	Likelihood of hazard occurring	Consequence	Risk Score
Soil and Water pollution	Ground water pollution by migrating leachate	Unlikely	Moderate	6
	Dam overflow/failure due to high rainfall event	Unlikely	Moderate	8
	High sediment load into stormwater system / receiving waters	Unlikely	Moderate	6
	Runoff of surface water from disturbed parts of site carrying high sediment loads	Possible	Minor	6
	Soil and water pollution as a result of refuelling plant and equipment on site	Possible	Minor	6
	Spills or leaks from treatment chemicals entering groundwater, contaminating soil or running into local waterways	Unlikely	Moderate	6
Air pollution	Excessive impurities, pathogens and / or toxins admitted to the air	Unlikely	Moderate	6
	Fire resulting in the production of hazardous smoke	Rare	Moderate	3
Unexpected findings	Discovery of orphan waste on site	Possible	Insignificant	3
	Uncontained asbestos in waste stream	Possible	Major	12

TABLE 3 EXPOSURE PATHWAY ASSESSMENT

Beneficial user	Pathway			Comment
	Dermal	Ingestion	Vapour/dust	
Surrounding residents/industries	Unlikely	Unlikely	Unlikely	No access to contaminated material as unauthorised personnel will not be able to access the site and we anticipate that the dust generated from the works will not be significant enough to impact neighboring properties.
Visitors to the site	Unlikely	Unlikely	Potential	Possible access to contaminated material during operating hours, however visitors are not expected to come into direct contact with pre-treated or stockpiled soil. There may be a potential for vapour and/or dust to affect air quality onsite as well as potentially downwind of facility, visitors are expected to wear appropriate PPE on site.
Site personnel	Potential	Potential	Potential	Site personnel may come into contact with potentially impacted soil and should apply the procedures outlined in this PIRMP as a minimum. There is a potential exposure to vapours and/or dust during such works; however exposure is expected to be low or infrequent. Nevertheless, appropriate PPE and hygiene should be applied and if required, the use of ambient air monitoring in the vicinity of works to assess potential risks.

These tables should be reviewed and the hazard assessment revised if the activities being undertaken on site vary from those currently being undertaken as listed within the EPL.

6 ROLES AND RESPONSIBILITIES

The following roles and responsibilities for each staff member involved in the construction and management of the facility are discussed below in TABLE 4. Persons assigned with areas of responsibility are given authority to achieve the outcomes specified by their role.

TABLE 4 ROLES AND RESPONSIBILITIES

Title	Reports to	General responsibilities
Principal Certifying Authority (PCA) Cootamundra Shire Council	-	The key responsibility of the PCA is to ensure: • ensures that the development of the SRF occurs in accordance with Development Application Consent (DA) S9611-058 for the soil recycling facility; • perform external audits (if requested); and • liaise with consultant/contractor and NSW EPA on all aspects of the work (as required).
Licensee EESI Contracting	PCA	The key responsibility of EESI Contracting is to ensure a safe work environment and ensure the project is run to the satisfaction of all parties involved. Specifically, EESI Contracting will: • oversee the construction, running and maintenance of the soil recycling facility; • perform internal audits; • implement requirements of the Cootamundra Shire Council Development Consent Application; and • liaise with NSW EPA and provide annual returns and documentation as required.
Key Contractor (During operation of the facility) Waste Science Pty Ltd t/- New Soil	New Soil (Operation)	The key contractor is responsible for all operational activities in relation to this site. Further to this, the key contractor has the following particular responsibilities under this PIRMP: • engage, manage and coordinate suitably qualified sub-contractors to conduct works; • liaise with sub-contractors and client and EPA NSW on all aspects of the work; • implement and verify preventative and corrective action following any WHS and environmental non-conformances; • ensure that Safe Work Method Statements (SWMS's) and site safety rules are developed for the site activities proposed and adhered to by staff and sub-contractors; • ensure all staff and sub-contractors are briefed and aware of their obligations and responsibilities under the PIRMP; • provide a safe onsite work environment; • identify WHS hazards and assess associated risks related to the work being undertaken; • provide suitable site hygiene facilities during the works including toilets, showers, lunchroom and rubbish bins; • establish safe work practices and provide for relevant training in those practices; • ensure all staff and sub-contractors are appropriately trained for their allocated tasks; • provide for the adequate maintenance of plant, tools, premises and equipment; • control access to the worksite ensuring all staff and visitors are either inducted onto the worksite or accompanied; • ensure all staff on-site attend inductions, scheduled toolbox talks and sign in and out of the worksite; • provide direction and/or supervision in emergency situations; • advise to stop work in the event of an activity causing or potentially causing a health and safety risk; and • control activities until an identified safety deficiency or unsatisfactory condition has been corrected. In addition to the above: • ensure that the requirements of this PIRMP are implemented; • maintain this PIRMP; • identify WHS and environmental risks; • liaise with site owner (PCA) and relevant authorities; • maintain Environment Incident reports; • record keeping including: non-conformances and • conduct annual reviews of the PIRMP plan and ensure that any necessary revisions are undertaken.

Title	Reports to	General responsibilities
Project Manager (Adam Gammon)	PCA	The key responsibility of the Project Manager / Technical Site Manager is to ensure the successful completion and subsequent operation of the development, including ensuring a safe worksite is maintained throughout the project. Specifically the Project Manager / Technical Site Manager will: • ensure compliance with relevant Acts, Regulations, Codes of Practice, Standards and contract conditions; • ensure soils are sampled and validated before transporting to the Soil Recycling facility; • provide adequate information to the site manager about sampling of stockpiles for final compliance before soils are taken off site • liaise with stakeholders on environmental management issues and responsible for community consultation and EPA compliance reporting; and • contact appropriate authorities in the event of a pollution incident.
Technical Manager (James Barwood)	Project Manager	The key responsibility of the Technical manager is of assessing inbound and outbound soil for compliance. Specifically the Technical manager will: • ensure compliance with relevant Acts, Regulations, Codes of Practice, Standards and contract conditions; • ensure soils are sampled and validated for transporting to the Soil Recycling facility • provide for the adequate information to the site manager about sampling of stockpiles for final compliance before soils are taken off site
Site Manager (Ty Wickham)	Project Manager	The key role of the Site Manager is to ensure the successful on-going operation of the facility and provide advice to the project manager on WHS responsibilities and ensure that all staff are aware of their responsibilities. Specifically, the Site Manager will: • ensure compliance with relevant Acts, Regulations, Codes of Practice, Standards and contract conditions; • co-ordinate and direct staff and subcontractors (if any) in WHS matters; • assist the WHS inductions; • ensure that site specific checklists, all Safe Work Method Statements (SWMS's) and site safety rules are being adhered to by staff and contactors while on-site; and • provide direction and/or supervision in emergency incidents and act as Fire Marshall for the site.
WHS Representative (Ty Wickham)	Project Manager	The WHS Representative will monitor compliance with the PIRMP. The WHS Representative can also provide feedback on the appropriateness of WHS procedures and practices. In particular the WHS Representative is to: • be involved in the site inductions; • provide advice on implementation of the PIRMP and aspects of WHS related to handling of contaminated soil and hazardous substances; • conduct regular site inspections to ensure works are being carried out in accordance with the PIRMP and any other available plans; • control activities until an identified safety or environmental deficiency or unsatisfactory condition has been corrected; • advise to stop work in the event of an activity causing or potentially causing a health and safety risk; and • advise site manager, and project manager on preventative or corrective actions where health and safety issues related to handling of contaminated soil or hazardous substances are identified.

Title	Reports to	General responsibilities
All Staff and Sub Contractors	Site Manager and Project Manager	All staff and subcontractors will undertake the work they have instructed to do and whilst doing that, have a duty of care towards other site personnel, the general public and for their own safety. In particular, they must: • comply with statutory requirements and site safety rules, as identified at the time of induction, as they apply to the type of work the subcontractors are involved in; • prepare relevant SWMS's with environmental risk assessment for the work they will be conducting; • have the SWMS's reviewed by the key contractor and amended if necessary prior to starting works; • participate in induction training on the site and attend regular tool box meetings; • abide by any other project SWMS (Appendix A) that relates to the work they are doing; • report any hazardous or potentially hazardous practices on the site; • report any health and safety incidents or near misses; • implement practical ways to minimize health and safety risks; and • a representative to be appointed as a Fire Warden to assist in the event of a pollution incident.

7 ENVIRONMENTAL TRAINING

7.1 Qualifications

All personnel directly involved in environmental management will be appropriately trained to undertake the tasks of the position to which they are appointed.

7.2 Training programs

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 all management plans such that they know of their responsibilities in their day-to-day tasks as well as in the event of a pollution incident.

There are three elements that make up how training is undertaken at the Soil Recycling Facility. These include:

- competency and training;
- site inductions;
- toolbox talks;
- simulated drills/exercises; and
- on-going training.

Those elements of the PIRMP which directly relate to the work to be carried out by the person or persons being inducted will be covered as part of their induction of employees. Records will detail the attendees and content of the induction/training and will be stored at the site office. These training records must be kept on site and updated whenever a staff member undertakes training.

The proposed frequency of training is summarized within Table 5.

FREQUENCY OF TRAINING

Training Type	Frequency	Reporting Requirement	How records are kept
General Induction	Commencement of employment	Signed on to the induction record	Kept at site office
Site Specific Induction	Commencement of employment	Understanding and sign onto the induction record	Kept at site office
Other job specific training	On a needs basis or when: • there is a change in procedure; • change in regulations; • new equipment; • deficiencies in job performance; and • 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	Kept at site office and by National Systems Manager

Training Type	Frequency	Reporting Requirement	How records are kept
Fire/evacuation Drill	Six monthly	Record this with the WHS training	Kept at site office and by National Systems Manager

7.2.1 Site induction

Training relevant to the PIRMP should be prepared and delivered to employees and all personnel employed to undertake any activity on-site involving the disturbance of soil and/or contaminated soil transported to the site (including sub-contractors such as construction or maintenance workers). All personnel entering the site should attend an induction briefing performed by the Site Manager or WHS Officer. A record of personnel training should be kept including the content of the training.

The sections of this PIRMP which directly relate to the work to be carried out by the person(s) being inducted should be covered as part of their induction. The PIRMP component of the training should include, but not limited to the following:

- introduction and purpose of this PIRMP;
- introduction to the contaminants of concern (CoC);
- introduce material safety data sheets for the CoC including recognition of potential symptoms of exposure and treatment for exposure;
- physical hazards of the work site(s) and work activities;
- WHS control measures (including personal protection equipment (PPE) and personal hygiene) to be implemented;
- environmental hazards;
- environmental control measures to be implemented; and
- incident reporting.

7.2.2 Simulated exercises

A simulated test of the PIRMP is to be undertaken annually. The objective of this exercise is to test the effectiveness of the plan and provide an interactive training exercise for staff. The Licensee (EESI Contracting) is responsible for ensuring these exercises are undertaken. The planning of this exercise is to be undertaken by the Site Manager.

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 / chemical spill;
- stormwater runoff event / sediment loading incident;
- landslide;
- fumes / odour; and
- fire.

Requirements of this exercise include;

- informing those on site that a simulation will be taking place that day;
- informing the public that a simulation will be taking place that day, specifying the time and date;

- at the toolbox talk on the morning of the simulation, the Site Manager 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).

The outcome of this exercise is to:

- 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.

7.2.3 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.

7.3 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.

The requirements for the document review are:

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

8 COMMUNICATIONS

8.1 Contact details

The following table presents the list of contacts that may be needed to be contacted in relation to site activities, community relations or in the case of a pollution incident. In the event of a pollution incident, Section 9 of this plan outlines in more detail the actions immediately to be undertaken (including the relevant emergency contacts to contact and when).

CONTACT DETAILS

Name	Position	Role	Organisation	Contact
Soil Recycling Facility	Main Number	Managing day-to-day site operations	Soil Recycling Facility	0447 040 222
Soil Recycling Facility	Complaints Line	Managing complaints and community correspondence	Soil Recycling Facility	1300 510 805
Adam Gammon	Operations Manager	Manage site operations, oversee training and Site Marshall	New Soil	0447 040 222
James Barwood	Manager of New Soil	Oversee facility operations	New Soil	0448 044 604
Ty Wickham	Site Manager/WHS Officer	Manage site WHS	New Soil	0417 965 403
Ian Brookman	CEO	Oversee internal audits	EESI Group	0418 524 671
NSW Fire and Rescue	-	Emergency Response	-	000 or 112 from mobiles
Police	-	Emergency Response	-	000 or 112 from mobiles
Ambulance	-	Emergency Response	-	000 or 112 from mobiles
Environmental Hotline	-	Environmental reporting	NSW EPA	131 555 or (02) 9995 5555
WHS Incident Reporting	-	Incident reporting	Workcover NSW	13 10 50
Public Health Unit	Public Health Officer	Surveillance and public health response	NSW Health (diverts to Albury Base Hospital)	(02) 6080 8900
Environmental Earth Sciences	-	Environmental advice	Environmental Earth Sciences NSW	(02) 9922 1777
Adam Gammon / Ty Wickham	Fire Warden	Site Emergency Fire response	New Soil	0447 040 222 0417 965 403

9 EMERGENCY RESPONSE TO POLLUTION INCIDENTS

A flowchart representing the facility incident/emergency response management plan is located within Appendix B and should be identified to all staff and visitors during site inductions. The flowchart should be used in conjunction with this PIRMP, not as a standalone document.

In the event of an environmental incident or emergency, full site crisis co-ordination control is the responsibility of the site manager or a nominated management representative until the respective emergency services arrive. All communication to and from the emergency services is to be through the site manager (or delegate in their absence).

Emergency procedures on site will cover actions to be taken if major events occur. The first priority must always be the safety of any persons, either workers or others involved in the events. Major events may include but not limited be to:

- fuel, oil or other contaminant spillage (>200 L);
- failure of construction, temporary structures and bunds; and
- fires and floods.

To ensure that the environmental impact of major events is minimised, emergency procedures are to be followed and the site manager will be responsible for crisis co-ordination. The site manager will be on-site at all times until the emergency is cleared. These procedure guides are detailed in Section 9.2.

If an emergency situation arises out of hours, the site manager will be contacted immediately. If unavailable, his/her representative will be contacted.

If necessary, the site manager will contact the project manager or nominated representative to contact:

- Emergency Services including NSW Fire and Rescue, Police and Ambulance; and/or
- WorkCover NSW; and/or
- EPA NSW.

All emergency responses should take place as soon as possible after the event. If safe to do so, and once the threat to human health is removed, the priority is to stabilise the situation and to prevent the situation escalating. All work causing or directly affected by the event must cease and no work can re-commence before a clearance from the site manager is obtained.

Actions to be taken include:

- temporary re-establishment of the control structure to prevent further impact;
- taking appropriate photographs to record the extent of the problem; and
- clean up by appropriately trained personnel.

For emergencies causing substantial pollution, the relevant authorities must be notified as soon as the person carrying out the activity, or the employer, becomes aware of the incident. Should any incidents causing or threatening material harm to the environment occur, EESI Contracting (Licensee) must contact the relevant authorities as soon as they are made aware of the incident. The relevant authorities for this site include:

- Cootamundra Gundagai regional council;
- EPA;
- Public Health Officer (the Ministry of Health);
- NSW WorkCover Authority; and
- NSW Fire and Rescue.

Where an authorised officer of the EPA suspects that an event has occurred that is causing or is likely to cause material harm to the environment, the officer may request a report. In such an event, EESI Contracting (Licensee) will make all reasonable inquiries in relation to the event and produce a report to the EPA detailing the requested information and within the given time frame.

The nature of the pollutants has been detailed in Section 4 and the risk of a major pollution hazard is quite low. In the event of an incident that cannot be managed on site, the following should be contacted in the designated order. Contacts are required to be called if the pollution incident poses an appropriate level of risk.

9.1 Emergency contact details

Contact names and numbers, in designated order of contact if applicable, include:

NSW Fire and Rescue.....000 or 112

Police .....000 or 112

Ambulance .....000 or 112

Telephone complaints line.....1300 510 805

Site Manager (Ty Wickham) 0417 965 403

New Soil Manager (James Barwood) 0448 044 604

EESI Contracting Manager (Adam Gammon) 0447 040 222

NSW EPA.....131 555

WorkCover NSW.....13 10 50

Public Health Officer.....(02) 6080 8900

Cootamundra Shire Council .....(02) 6940 2100

Please note that the closest hospital to site is the Cootamundra Hospital located at Mackay Street, Cootamundra, NSW. Directions from site to the hospital are shown in Appendix B.

9.2 Emergency procedures guide

In the event of an emergency, those at the scene are to immediately contact the Site Manager (via walkie talkie or mobile phone).

The site manager is to assess the situation and inform the staff at the weighbridge of instructions for staff and subcontractors. Where evacuation procedures need to be initialized, the siren is to be switched on.

Emergency Siren/ Mega Phones/UHF CH13

The locations of the emergency siren/mega phones are shown in the site office on the Safety Notice Board (the emergency sirens/mega phones are located in the site office and along the southern boundary of the site.

Once the site manager is aware of the emergency (via emergency siren, UHF or mobile phone), the siren at the site office will be activated (**three short sirens several seconds apart**) and the cycle repeated until all site personnel are located at the Emergency Assembly Area, signed off and cross-checked with the visitor register. The Emergency Assembly Area is located at the front entrance (entrance to the site via Old Treatment Works Lane).

In the event that a staff member is not accounted for, on the instruction of the site manager, provided it is safe to do so, a delegated staff member will attempt to locate the missing staff member.

Once all staff are accounted for, a decision will be made regarding the seriousness of the emergency event (i.e. minor/major). The site manager or project manager will then put procedures into place to mitigate such risks.

All emergencies:

- Site Manager to collect the visitor register book and head to the emergency assembly area;
- All staff and subcontractors to shut off engines and any electrical equipment and leave off;
- No smoking, naked light or other source of ignition in the vicinity;
- Evacuate the immediate area;
- Keep upwind;
- Check for spills or leaks ((especially in the chemical storage area and Mobile Unit for Soil Treatment (MUST) unit);
- Site manager should contact the technical project manager, and/or project manager, Police, Fire Brigade and Ambulance (if required):
- Inform contact person the location, material, quantity and emergency contact as well as any damage observed; and
- The technical project manager or project manager is to report the incident to the relevant authorities (if applicable).

Spill or leak:

- Carry out actions for “All Emergencies”;
- Stop leak - IF SAFE TO DO SO;
- Prevent spilled product from spreading or entering drains or watercourses by banking with sand or earth;
- Absorb small liquid spills with sand or earth;
- DO NOT wash residue away with water: and
- Report the incident to the surrounding properties (if affected).

Fires / explosions:

- The site fire warden and office fire warden are in charge of their specific areas;
- Carry out actions for "All Emergencies";
- For minor fire, IF SAFE TO DO SO, use appropriate extinguisher (trained personnel);
- For major fire: Call NSW Fire and Rescue;
- Prevent runoff from entering drain or watercourse by banking with sand or earth;
- If unable to control fire, withdraw personnel from the area and warn against entry; and
- Report the incident to surrounding properties (if affected).

Plant / truck accident:

- Carry out actions for "All Emergencies"; and
- Avoid moving vehicle if movement could cause or increase spillage or danger to trapped personnel.

Damage to services:

- Carry out actions for "All Emergencies"; and
- Notify relevant service provider advising of the location, emergency contact and damage observed.

Dam failure/overflow:

- Carry out actions for "All Emergencies";
- Assess level retention dams
- If needed utilise high volume diesel water pump (watercart) to pump overfull dam into a dam with adequate capacity.
- Monitor

Rupture of fuel tanks:

- Carry out actions for "All Emergencies";
- Stop leak - IF SAFE TO DO SO;
- Prevent spilled product from spreading or entering drains or watercourses by banking with sand or earth;
- Absorb small liquid spills with sand or earth; and
- DO NOT wash residue away with water.

10 CONTROL MEASURES

This part of the PIRMP outlines the control measures for certain environmental aspects.

10.1 Dust management

The objective is to maintain satisfactory air quality by minimising the impact of air pollution generated by dust and particulates. The objective of this plan is to minimise the effects of construction activities on the surrounding air environment. The objective can be achieved by minimising the impact of air pollution generated by works.

Dust management controls are outlined. Onsite dust mitigation measures will include regular use of a water truck (specifically on haul out roads, treatment pads and areas of bare earth) to minimize air borne dust, the spraying of stockpiles during turning, stop work on days of high winds and limit plant movement as much as possible.

10.2 Fire management

The site is close to the town centre and as such any fires onsite will be managed by NSW Fire and Rescue. The NSW Fire and Rescue number is listed in Section 9.0. As a minimum fire management at the site will include:

- clearing a fire break of approximately 1.5m around the site perimeter;
- fuel reduction - including the spraying of weeds and grasses;
- access to the Water Truck onsite and the trailer mounted fire unit;
- limit work on days of total fire ban e.g no excessive tracking of machines; and
- daily toolbox talks in the summer months and regular training drills so that all site staff are informed of any excavation procedures.

10.3 Vapour/Odour management

Vapour (from impacted soil) may occur due to the nature of the activities at this site. A review of odour management practices was conducted in March 2014 by The Odour Unit as part of an air quality impact assessment. Recommendations from this report have been incorporated in the mitigation measures below. To mitigate the risk to potential receptors and site workers the following may be implemented:

- organic barriers such as rice hulls, straw, sawdust, lime, mulch and/or non odorous soil will be used over odorous material or odorous stockpiles. If biofilters are insufficient, an artificial barrier can be applied to stockpiles if required prior to treatment. A ready supply of commercially available material will be kept on site at all times;
- synthetic barriers such as plastic and/or tarpaulins will be used over odourous material or odourous stockpiles (related to gas wastes) prior to treatment over material situated on the treatment pad. A ready supply of tarpaulins/plastic will be available on site;
- treatment pad area is not to exceed 1750 m^2 and to be clearly marked on site;
- vehicle emissions should be kept to a minimum by avoidance of unnecessary engine running time. Regular checks of exhaust emissions from equipment will be conducted. If visible smoke from any equipment is observed for longer than 10 seconds, the equipment will be tuned, modified or maintained to prevent this from further occurring;

- stop works until odour dissipates and re-evaluate the odour control techniques to result in continued works with minimal odour output; and
- monitor weather conditions, wind direction and wind speed on a daily basis. Both receipt, treatment and turning of odorous material is to cease when the wind direction is from the NE to E on the wind rose. On site weather records and visual wind aid to be maintained. Weather station data to be retained on site.

Additional work practices for Gasworks contaminated material:

- estimation of number of trucks coming for the following day and times of arrival;
- weather monitoring will be done on the SRF site on receiving days, for more accurate forecast of daily weather events. Trucks will not be permitted to unload if wind direction is blowing in direction of neighbouring properties. Please inform your drivers there may be a delay if wind direction is unsuitable. Should weather patterns dictate it is unsuitable to receive soil we will contact you as soon as practical to cancel trucks;
- ensure truck's tarps are in good condition and sealed appropriately;
- truck drivers will be instructed not to speed past neighbouring property, which may cause draught;
- after trucks have unloaded they will be washed out and/or sprayed with odour suppressant if necessary, before leaving the site, and tarps must be put back in place to ensure no residual odour escapes;
- all untreated material will be processed immediately after unloading with generous amounts of straw, mulch and odour suppressant;
- all untreated stockpiles will also be covered with tarps at end of each day;
- work pads will be kept clean of any odour generating material such as rocks, timber and other debris. This material will be placed in sealed areas and covered with tarps and disposed of as soon as practical;
- work pads are sprayed at end of each day with odour suppressant if required;
- treatment Pad to not exceed 1750 m^2 and be clearly marked;
- trucks will only be received between the hours of 7am and 5pm; and
- odour suppressing misting units deployed if necessary.

All emissions from site plant and other vehicles and equipment related to the works must meet the design criteria detailed in the Protection of the Environment Operations (Clean Air) Regulation 2010. Where it is found that equipment does not meet emissions criteria, air pollution control techniques are to be implemented. These may include servicing of the equipment to reduce exhaust emission, use of another more exhaust efficient piece of equipment or fitting of the piece of equipment with exhaust mitigating systems (if available).

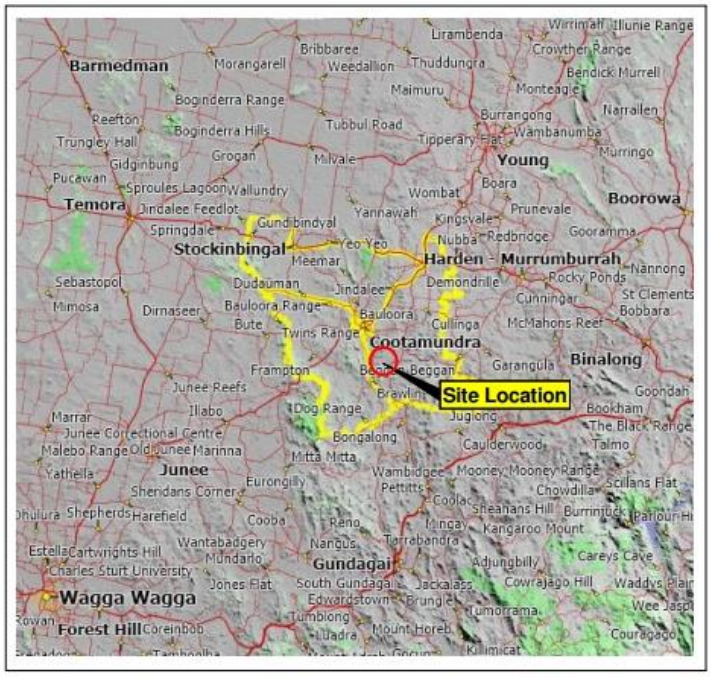
10.4 High rainfall event / Dam overflow / Failure

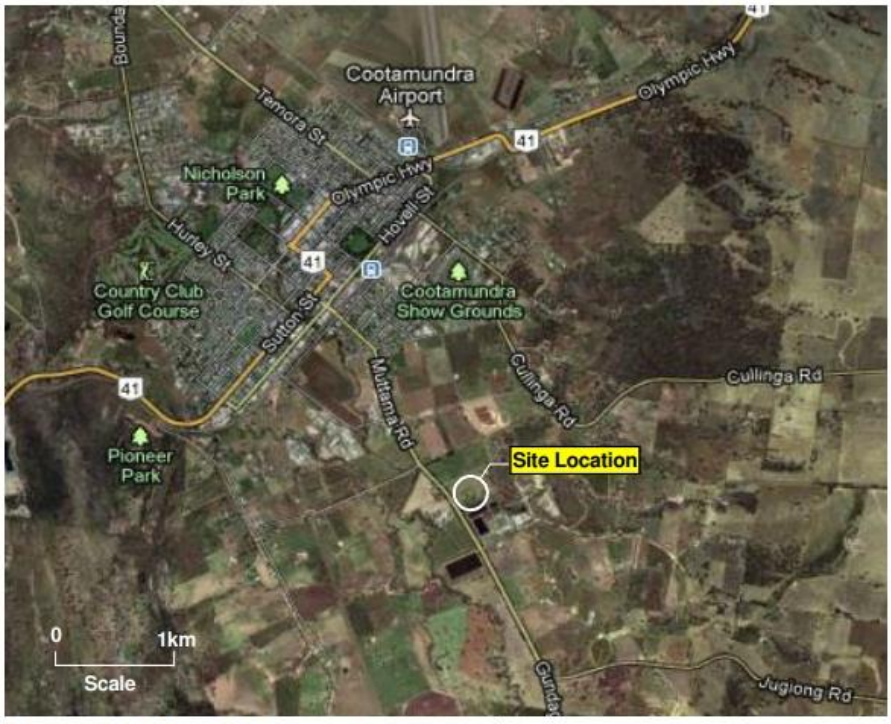
The objective is to maintain satisfactory runoff containment minimising the impact of high runoff generated by heavy rain events. Due to climate change we are seeing more regular extreme weather events. The objective of this plan is to minimise the effects of groundwater contamination on the surrounding water table. The objective can be achieved by monitoring runoff catchment areas and maintenance of these areas.

Runoff management controls are outlined. Onsite runoff mitigation measures will include regular maintenance of dam walls, spoon drains on treatment pads and areas of bare earth to minimize runoff, the pumping of overfull dams into dams with higher capacity, stop work on days of high rain events and limit plant movement as much as possible and the addition of straw bales to dam walls to filter sediment. Chemicals and additives to be stored above areas that are prone to inundation.

FIGURES

FIGURE 1: SITE LOCATION





NEW SOIL SOIL RECYCLING	Title: Site Location Plan	
	Location: Old Treatment Works Lane, Cootamundra, NSW	
Client: Waste Science		Job number: 116035
Drawn by: TRJ	Scale: As shown	Source: See Ref.
Proj Man: AR	Date: April 2016	Figure 1

FIGURE 2: SITE LAYOUT

INCIDENT RESPONSE FLOWCHART

INCIDENT/EMERGENCY RESPONSE MANAGEMENT PLAN

IN THE EVENT OF AN INCIDENT OR EMERGENCY:

ASSESS RISK AND SEVERITY

IS THERE AN IMMEDIATE THREAT TO HUMAN HEALTH, EQUIPMENT AND/OR THE ENVIRONMENT?

NO → Manage the incident on site.

YES

PRIMARY PERSON AT INCIDENT:

1) Ensure all people, including subcontractors, are evacuated to the Emergency assembly point (Old Treatment Works lane gate).
2) Contact SITE MANAGER
Ty Wickham 0417 965 403

SITE MANAGER:

1) Have EMERGENCY SERVICES been contacted (if required)? 000 or 112 from a mobile phone
2) What is the nature of the incident? (refer to MSDS) – Reassess risk and severity
3) Initiate evacuation procedures (if required)
4) Contact PROJECT MANAGER – New Soil
Adam Gammon 0447 040 222

PROJECT MANAGER:

Contact APPROPRIATE AUTHORITIES in the following order (if required):

1) EPA – 1300 361 967 or (02) 9995 5000
2) Ministry of Health: Public Health Officer – (02) 9391 9000
3) WorkCover NSW – 131 050

RISK and SEVERITY ASSESSMENT

SEVERITY ONE	SEVERITY TWO	SEVERITY THREE
Incident could affect only those in the immediate area if safe to do so manage onsite	Incident could affect others within the site. Follow Emergency Procedure	Incident could affect surrounding neighbours. Follow Emergency Procedure

EMERGENCY PROCEDURE

- SITE MANAGER/PRIMARY PERSON to sound 3 bursts of siren
- evacuate the immediate area
- SITE MANAGER to collect visitor register book and head to emergency assembly area
- FIRE WARDENS* to ensure ALL STAFF and SUBCONTRACTORS to shut off equipment/generator and move to emergency assembly area
- SITE MANAGER to account for all staff and visitors at the emergency assembly area
- SITE MANAGER to contact emergency services if necessary 000 or 112 from a mobile phone
- SITE MANAGER to restrict access to area and broadcast notification via mobile phone and UHF
- If safe to do so close Waste depot gate to restrict access
- When EMERGENCY SERVICES have controlled the incident the SITE MANAGER is to assess the situation in consultation with the PROJECT MANAGER and instruct staff and visitors.
- SITE MANAGER and/or NSW Fire and Rescue to contact surrounding neighbours
- IF SAFE TO DO SO: check for spills and leaks.

DOCUMENT INCIDENT

FIRE WARDENS: Adam Gammon 0447 040 222

Ty Wickham 0413 057 683

CHECKLIST – POST INCIDENT

Has PROJECT MANAGER been informed?	☐	Has the EMP been reviewed within 30 days of the incident?	☐
Has PROJECT MANAGER contacted the relevant authorities?	☐	- Does the document require revision?	☐
Has an Incident Report form been completed?	☐	- Is additional training required?	☐
Has a POLLUTION INCIDENT been reported to the EPA?	☐	Has the incident been cleaned up appropriately?	☐

DIRECTIONS

TO HOSPITAL FROM THE SRF, COOTAMUNDRA

The closest Hospital is the Cootamundra Hospital, Cootamundra located at Mackay Street, Cootamundra.

The directions to the hospital from Tuners Lane, Cootamundra are:

- Head south-west on Turners Lane, towards Gundagai Road;
- Turn right onto Gundagai Road;
- Continue onto Muttama Road, going through the first roundabout;
- At the 2nd roundabout, exit onto Mackay Street; and
- Continue 700m along Mackay Street to the hospital.

The map showing the direction towards Cootamundra Hospital is provided below (extracted from Google).