

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LEPPINGTON DAIRY FACILITY



OCTOBER 2022

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Pollution Incident Response Management Plan

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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 Leppington Dairy Facility 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 Environmental 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 with your supervisor.

.....
Leppington Pastoral Company
Site Manager

Date:

Introduction

1.1 PURPOSE

This supporting statement and PIRMP have been prepared in accordance with the *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)* and reflects the requirements specified in the Environment Protection Authority'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.
- Procedures for co-ordinating those notified, and any action taken in combating the pollution.

1.2 DEFINITION OF A 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 that is prescribed by the regulations), and*

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

1.3 IDENTIFIED POLLUTION INCIDENT RISKS

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

- Transfer and oversupply of organic matter to surface water and groundwater.
- Excessive odour from fertilisers applied to ground crops and animal effluent storage ponds
- Excessive noise due to plant, machinery used for earth works or pumps used to pump water
- Excessive dust from dry worked paddocks during windy conditions
- Disease: Zoonoses. Direct contact with animal body fluids and indirect contact with areas animals live includes, objects, or surfaces that have been contaminated.
- Fire. Due to excessively hot weather conditions or from poorly maintained machinery.
- Loss of fuel from the bowser plant or machinery while refuelling or poorly maintained machinery.
- Acts of vandalism or target of terrorist activity,
- unforeseen / unauthorised entry to work site.

- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

Site Overview

1.4 SITE OVERVIEW

The site is located west of The Northern Road between Penrith and Camden, at 1674 The Northern Road, Bringelly. The site is zoned RU1 – Primary Production and is surrounded by other areas zoned RU1, RU4 – Primary Production Small Lots, R5 – Large Lot Residential, SP1 – Special Activities (Commonwealth activities), and SP2 – Infrastructure (Classified road, The Northern Road).

Access to the site is via a road linked to The Northern Road.

1.5 THE LOCALITY

The surrounding area is characterised by small scale farming and residential dwellings on large lots. **Figure 1** identifies the site in the context of the surrounding locality.

Figure 1: Subject Site and Surrounding Locality

1.6



1.7 SITE SUPERVISION AND CONTROL

The Leppington Dairy Facility has restricted access and is not open to the public. Only employees are permitted to access the site and authorised access given to contractors and visitors are required to report to the main office to sign in before commencing activities and sign out when leaving.

1.8 SITE SAFETY EQUIPMENT

The site maintains the following safety equipment:

- Safety Data Sheets
- Chemical Wash stations
- Noise Monitoring as required
 - Safety signage including chemical signage
- Traffic Management Plan
- Accessible Manifest of Hazardous Chemicals
- Fire extinguishers at strategic locations
- Spill kits
- On-site water cart available to extinguish fires
- PPE which includes dust masks, safety glasses, protective gloves, and ear plugs.

Risk Management and Pre-emptive Actions

1.9 INTRODUCTION

The following section outlines current operational procedures and design intended to minimise and manage risk. Contractors working on site are responsible for being aware and notifying the Farm Manager of any potential pollution incidents on the premises.

1.10 PRE-EMPTIVE ACTIONS

1.10.1 WATER POLLUTION

The potential for pollution of surface and ground waters at the site and in surrounding areas is controlled by the following:

- The biological treatment of effluent (through a system of anaerobic and facultative ponds) to ensure effluent is suitable for irrigation.
- Clay lined impermeable barriers in the effluent ponds.

- Managing irrigation scheduling and rates to best utilise the water resource to promote optimum plant growth, prevent soil from becoming waterlogged, and prevent excess nutrient run-off or percolation to groundwater.
- An EPA approved precautionary discharge plan to prevent the uncontrolled release of effluent during extended or significant wet periods.
- The effluent management system is not located in a flood prone area.
- The groundwater resource is not vulnerable.
- Unsealed roads are located and managed to minimise soil movement and erosion.
- Adequate wet-weather storage capacity for liquid and solid effluent, feed leachate and contaminated surface water.
- Nutrient and chemical storage areas are constructed on an impervious base material to protect ground water from pollution.
- Chemicals are stored in bunded areas.
- The effluent system equipment is serviced on a regular basis and backup equipment is available for emergencies.
- The effluent is periodically tested for nutrient value.
- Treated effluent application areas are rotated to prevent excess nutrient build-up and to optimise nutrient use.

1.10.2 SOIL CONTAMINATION

In addition to pre-emptive actions in **Section 1.10.1** that also apply to soil contamination, the potential for soil contamination at the site and in surrounding areas is also controlled by soil testing to monitor the ongoing suitability of application sites.

1.10.3 EXCESSIVE ODOUR

The free stall dairy layout reduces conventional odour sources associated with dairy farming, specifically the more effective handling of manure through the following:

- Flushing the free stall sheds three times daily removes manure.
- The sheds, in conjunction with the dry weather lots, results in the bulk of manure being flushed from a concrete surface as opposed to siting in the dairy yards and mixing with mud to create an odour source.
- Scraping the dry weather lots on a fortnightly basis removes this odour source.

Further to the free stall dairy layout, the potential for excessive odour to occur at the site and in surrounding areas is controlled by the following:

- The location of the dairy facility, effluent management systems, feed storage areas and free stall sheds with regard to neighbouring residences, public roads and wind direction.
- Correct operation and regular maintenance of equipment to prevent excessive odours.
- Prompt management of waste materials (i.e. wet feed).
- Dispose of any dead animals promptly by composting.
- Feed storage areas are constructed such that feed is kept dry and stored on an impervious service. These areas are also bunded to contain any leachate from moist feeds.

- The wind direction and velocity are measured on days when irrigation or manure spreading is planned. Application times are adjusted to minimise odour impacts.
- Irrigation scheduling and rates are managed to prevent ponding of treated effluent.

1.10.4 EXCESSIVE NOISE

The potential for excessive noise at the site and in surrounding areas is controlled by the following:

- Noise monitoring (as required) Using a Digital Sound Level Meter.
- Noise levels generated by the site and related activities do not exceed the requirements of the Noise Policy for Industry (EPA, 2017).
- An EMP is developed and implemented that includes strategies, measures and contingency actions for minimising noise impacts which include but are not limited to:
 - Sufficient setbacks are implemented to minimise noise transmission to nearby areas.
 - All vehicles and machinery are properly maintained, to ensure that noise does not exceed manufacturers' specifications.
 - All mechanical equipment is sited away from sensitive land uses.
 - Livestock are immediately investigated if distressed.

1.10.5 EXCESSIVE DUST

The potential for excessive dust at the site and in surrounding areas is controlled by the following:

- All on site facilities are cleaned regularly.
- Loads of feed and other potentially dusty material are securely covered during transport, and any spills are promptly cleaned up.
- Appropriate groundcover plants and vegetation screens are established and maintained, including sustainable grazing practises to maintain pasture growth.
- Site operations are planned and performed considering weather conditions and forecasts (e.g., wind direction and strength), to minimise dust.
- Dust-generating areas (e.g. roadways) are dampened with water spray if unacceptable dust levels from significant vehicle or stock movements are likely.
- Speed limiting on internal roads.

1.10.6 BIOSECURITY HAZARD

The potential for biosecurity hazards at the site and in surrounding areas is controlled by the following:

- Preventing the introduction of disease to the site:
 - Treatment of livestock prior to introduction
 - Segregation of stock if required.
 - Roads and ramps are fenced off from stock to prevent exposure to diseases introduced on vehicle wheels or shoes of visitors.
- Preventing occurrence and spread of disease on site:
 - Vaccination
 - Stock proof fencing to prevent livestock entering and exiting the site.

- Disposal of carcasses
- Exclusion of stock from disposal areas.

1.10.6.1 Dead Livestock

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

- Immediate action will be taken to remove the dead livestock from the dairy facilities and for composting to occur.
- In the event of mass livestock death or notifiable disease, the Farm Manager will provide appropriate notification to the relevant authorities, as detailed below.

Notification of Animal Disease

Mass livestock death and notifiable disease is not considered to be an incident that requires notification under this PIRMP. The Farm Manager is required to provide notification of the relevant authorities identified the following sections.

Emergency and Non-Emergency animal diseases are provided online by NSW Department of Primary Industries at https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0015/114414/Notifiable-pests-and-diseases-of-animals-in-NSW.pdf.

Suspicion or awareness of **prohibited matter** and **biosecurity events** must be immediately reported verbally to an authorised officer. This can be done by phoning:

- The Animal Biosecurity Emergency Hotline 1800 675 888 (24 hr hotline), or
- Your Local Land Services 1300 795 299 (during working hours)

Suspicion or awareness of other listed notifiable pests and diseases of animals must be notified within one working day. This can be done by:

- Phoning Local Land Services 1300 795 299, o+r
- Contacting NSW Department of Primary Industries authorised officer
- For less urgent cases (that are not potentially prohibited matter or a biosecurity event) it is possible to use an online form to notify. When in doubt as to whether you are dealing with prohibited matter, a biosecurity event, or another listed notifiable pest or disease of animals, it is better to phone to ensure you fulfil your duty to notify.

1.10.7 FIRE

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

- Maintaining machinery and equipment in good working order to minimise risk of sparks.
- Maintaining access to fire-fighting equipment.
- Regularly testing the efficiency of fire-fighting equipment.

1.10.8 LOSS OF FUEL, DIESEL OR OIL FROM PLANT OR MACHINERY

The potential for contaminants from operational plant and machinery are controlled by:

- Storage of hazardous materials such as diesel on site in bunded areas.
- Conducting and documenting fuel tank integrity testing.
- Maintaining machinery in good working order to minimise risk of spills.

- Ensuring spill kits are accessible on both operating machinery and the site office.

1.10.9 ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY

The boundary fence limits unauthorised access. All staff and contractors are required to be vigilant and aware that the site is a potential target for vandalism and immediately report to a Director any suspicious activity. The boundary fence limits unauthorised access and is to be checked regularly and maintained as required following these checks.

1.11 INVENTORY OF POLLUTANTS

Chemicals required for necessary operations of the dairy facility are stored at the premises in accordance with Regulatory requirements. These chemicals are stored at locations identified on the Site Plan in **Section 0**.

The maximum quantity of each pollutant stored is specified below:

- Two above-ground diesel storage tanks – 44,600 litres and 57,400 litres
- One underground unleaded storage – 10,000 litres
- Herbicides/Pesticides – 3,200 litres

1.12 POTENTIAL POLLUTION INCIDENTS

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

- Water pollution
- Soil contamination
- Excessive odour
- Excessive noise
- Excessive dust
- Biosecurity hazard
- Fire
- Acts of vandalism or target of terrorist activity
- Identification of any failure of an environment protection system
- Any other incident or observation that could potentially pose an immediate environmental hazard outside of normal operating conditions.

1.13 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 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 – Pollution Incident Response Management Plan**.

1.13.1 WATER POLLUTION

Low Likelihood – the likelihood of surface or ground water pollution is considered low. The pre-emptive actions listed in **Section 2.6.1** are considered highly likely to prevent any water pollution incident on or off site.

Medium Impact – in the event the surface or ground water is polluted, the impact may extend beyond the local scale, potentially affecting water quality on site and in the wider Duncan's Creek catchment area.

Contributing Factors – factors which may increase the risk of surface or ground water pollution include insufficient monitoring, maintenance and management of effluent ponds/treatment systems and irrigation areas.

1.13.2 SOIL CONTAMINATION

Low Likelihood – the likelihood of soil contamination is considered low. The pre-emptive actions listed in **Sections 2.6.1 and 2.6.2** are considered highly likely to prevent any soil contamination on or off site.

Medium Impact – in the event a soil contamination incident occurs, the impact may extend beyond the local scale where contamination is spread via water, potentially affecting contaminating soil on site and soils in the wider Duncan's Creek catchment area.

Contributing Factors – factors which may increase the risk of soil contamination include insufficient monitoring, maintenance and management of effluent ponds and irrigation areas, and improper storage of possible contaminants.

1.13.3 EXCESSIVE ODOUR

Low Likelihood – the likelihood of excessive odour is considered low. The pre-emptive actions listed in **Section 2.6.3** are considered highly likely to prevent excessive odour on or off site.

Medium Impact – in the event excessive odour occurs, the impact may extend beyond the site dependent upon meteorological conditions, potentially affecting nearby residential areas adjacent to the site.

Contributing Factors – factors which may increase the risk of excessive odour include operational factors such as (i) insufficient monitoring, maintenance and management of effluent ponds and irrigation areas, (ii) insufficient flushing of free stall sheds and scraping of dry weather lots, and (iii) slow response to removal of waste materials such as wet feed or carcasses; and natural factors, the wind direction and velocity.

1.13.4 EXCESSIVE NOISE

Low Likelihood – the likelihood of excessive noise is considered low. The pre-emptive actions listed in **Section 2.6.4** are considered highly likely to prevent any excessive noise pollution.

Medium Impact – in the event excessive noise pollution occurs, the impact may extend beyond the site dependent upon meteorological conditions, potentially affecting residential areas adjacent to the site.

Contributing Factors – factors which may increase the risk of excessive noise include insufficient maintenance of equipment and machinery, meteorological conditions that favour focusing of sound wave propagation, and livestock distress.

1.13.5 EXCESSIVE DUST

Low Likelihood – the likelihood of excessive dust generation from the site is considered low. The pre-emptive actions listed in **Section 2.6.5** are considered highly likely to prevent any excessive noise pollution.

Medium Impact – in the event excessive dust is generated from the site, the impact may extend beyond the site, potentially affecting air quality and nearby properties where dust may settle.

Contributing Factors – factors which may increase the risk of excessive dust generation from the site include high winds, insufficient dust suppression, insufficient management of vegetation/pasture cover, and insufficient cleaning of the facility.

1.13.6 BIOSECURITY HAZARD

Low Likelihood – the likelihood of a biosecurity hazard occurring on site or emanating from the site is considered low. The pre-emptive actions listed in **Section 2.6.6** are considered highly likely to prevent any biosecurity hazard.

High Impact – in the event a biosecurity hazard occurs, impacts to livestock or human health may extend to areas surrounding the site and considerably further if infected stock or products are distributed off site.

Contributing Factors – factors which may increase the risk of a biosecurity hazard include insufficient management, treatment, and monitoring of introduced and existing livestock, not monitoring stock fencing, and lack of staff knowledge of biosecurity hazards and procedures.

1.13.7 FIRE

Low Likelihood – the likelihood of fire is considered low as the pre-emptive actions listed in **Section 2.6.7** are considered highly likely to prevent a fire from occurring; in addition, the site is not bushfire prone and the site is largely cleared of vegetation.

High Impact – in the event that a surface fire occurred at the site, the impact would vary dependent upon contributing factors but has the potential to spread far beyond the boundaries of the Leppington Dairy Facility and is therefore considered high impact.

Contributing Factors – natural factors which may increase the risk of fire occurring include high winds, dry weather, prolonged high temperatures, low humidity, and spontaneous combustion. A human factor that may increase the risk of fire occurring is poor maintenance of machinery and equipment.

1.13.8 LOSS OF FUELS OR OIL

Low Likelihood – the likelihood of a fuel or oil spill from any vehicle, machinery or equipment on-site is considered low. The likelihood of a fuel spill from storage tanks is considered low.

Low Impact – in the event a vehicle, machine or equipment is found to be spilling or leaking fuel or oil, the spill would be localised, and spill kits are available to address the issue. In the event of a fuel spill from above-ground diesel storage tanks, bunding would provide containment.

Contributing Factors – factors which may increase the risk of loss of fuel or oil from vehicles, machinery or equipment include poor maintenance, and periods of high traffic flow. Factors which may increase the risk of a fuel spill or leak from storage tanks include bund failure or tank failure.

1.13.9 ACTS OF VANDALISM OR TARGET OF TERRORIST ACTIVITY

Low Likelihood – the likelihood of acts of vandalism or terrorist activity is considered low. The set back from roads and the lack of valuable targets for vandals or terrorists reduce the likelihood of such activity.

Medium Impact – in the event that an act of vandalism or targeted terrorist activity occurred, the impact would vary dependent on the extent of the attack but is generally considered low due to the likely targeted local extent of impact (within the boundaries of the site) however, the site is surrounded by areas that are bushfire prone and residential, which may be used as part of a vandal or terrorist activity.

Contributing Factors - factors which may increase the risk of vandalism or targeted terrorist activity include not maintaining fenced property boundaries, not locking site buildings, and not isolating equipment, vehicles, machinery, and equipment that are not in use. Risk is also increased during hours of closure and during sustained periods of hot and dry weather.

1.13.10 ANY OTHER INCIDENT OR OBSERVATION THAT COULD POTENTIALLY POSE AN IMMEDIATE ENVIRONMENTAL HAZARD OUTSIDE NORMAL OPERATING CONDITIONS

Low Likelihood – The site has significant and advanced environmental protection measures and monitoring schedules.

Low Impact – The site has significant and advanced environmental protection measures and monitoring schedules which are likely to identify, contain and prevent the immediate spread of environmental hazards outside of the premises even outside of normal operating conditions.

Contributing Factors – N/A.

PIRMP

1.14 DEFINITION OF A 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*:

"(1) For the purposes of this Part:

(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.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs."

1.15 NOTIFICATION OF POLLUTION INCIDENT

1.15.1 NOTIFICATION SPEED

The notification of the relevant authority when material harm to the environment or human health is caused or threatened must be 'immediate', meaning 'promptly without delay', but it does not mean undertaking notification ahead of doing what is necessary to make the environment safe.

1.15.2 NOTIFICATION OF RELEVANT AUTHORITIES

Where the pollution incident causes or threatens material harm to the environment or human health, the following authorities must be notified by those authorised to notify relevant authorities (see **Table 2.1**):

1. Emergency Call Services

- Emergency Hotline Number (24 hours) 000*

*The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and an emergency response 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. Liverpool City Council

- 24/7 Customer Contact Centre 1300 362 170

3. The Environment Protection Authority (EPA)

- Sydney Head Office 02 9995 5000
- Emergency Hotline Number 131 555

4. The Ministry of Health (via Public Health Units)

- Penrith Public Health Unit 02 4734 2022
 - On-call Public Health Officer 02 4734 2000
- 5. SafeWork NSW - Hotline Number:** 131 050
- 6. Fire and Rescue NSW - Warragamba Fire Station:** 02 4771222

If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the site supervisor is still required to follow that outlined above except for dialling 000.

A summary of the above pollution incident notification procedure is provided in **Document A** in **Appendix A**.

Table 0.1 – Responsible Personnel for Pollution Incident Notification, Communication and Activating the PIRMP

Name	Position	Phone	Mobile
Michael Perich	Director	02 4773 4291	0409 911 369
Ron Perich	Director	02 4773 4291	0408 254 828
Karen Sutton	Compliance Officer Safety / Environment	02 4773 4291	0438 353 993

1.15.3 INFORMATION TO BE NOTIFIED

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

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

Notification is required by the authorised notifier at Leppington Dairy Facility 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 SafeWork NSW.

A Pollution Incident Reporting Form is produced in **Document C** in **Appendix A** to assist the authorised notifiers at Leppington Dairy Facility in correctly recording and notifying the relevant authorities as detailed in **Section 3.2**.

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

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

Fire - In the case of a fire and where safe, attempts must be made to extinguish or contain the fire immediately. Fire extinguishers are available for small fires and a water tanker is on standby for larger fires.

Chemical Spill - that is not contained, chemical spill kits must be used to restrict the spread of the chemical. All chemicals are accompanied by relevant Safety Data Sheets (SDS)

Water / Effluent - Earthworks should be used to contain surface water discharge as far as practicable. Controlled precautionary discharge is implemented where dam and effluent holdings are exceeded.

Noise – Is where possible kept to a minimum in accordance with NSW Government Noise restrictions. Plant and machinery are maintained and monitored via a scheduled maintenance program

1.17 MINIMISING HARM TO PERSONS ON THE PREMISES

In the event of a pollution incident occurring, all site staff will be notified.

All staff and visitors will report to the Emergency Assembly Points; one is located at the weighbridge and another is located at the western side of the dairy stalls (refer – **Section 0**), 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 Farm Manager.

1.18 EPA POWERS OF DIRECTION AND 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 3.2**.

Once the EPA is notified, it is then for the EPA to determine whether any commercial, industrial and residential neighbours of the site need to be contacted by authorised notifiers at the Leppington Dairy Facility and informed of the circumstances of the incident and actions being taken in response to it. If deemed necessary, the EPA then has powers to formally direct authorised notifiers at the Leppington Dairy Facility to notify the neighbours of the site.

Irrespective of whether the EPA directs the authorised notifiers (*Table 3.1*) to notify neighbours and depending on the circumstances of the particular pollution incident, authorised notifiers may at their own discretion voluntarily choose to notify neighbours.

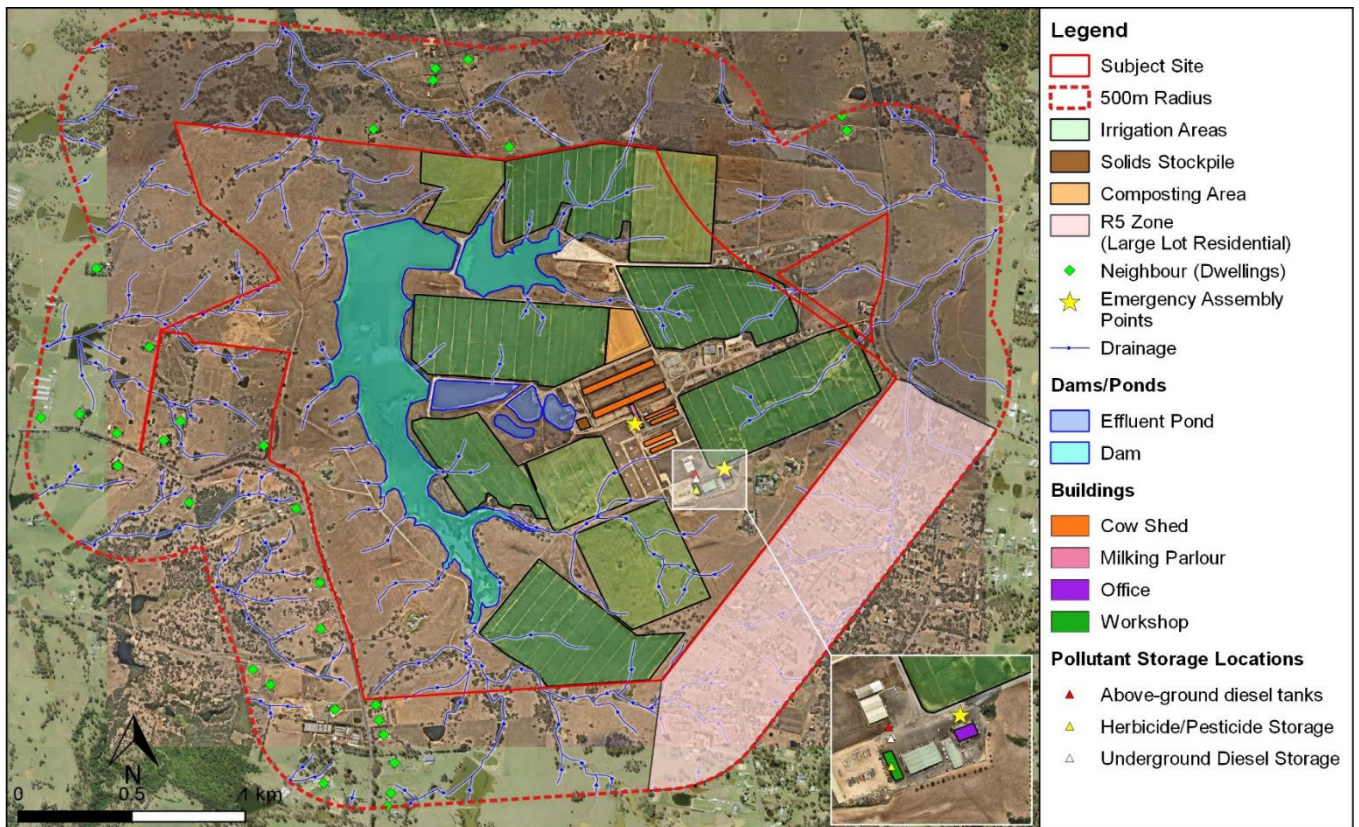
Authorised notifiers would notify neighbours by 'door knocking' or calling every neighbouring property identified on enclosed Site Plan (refer – **Section 0**). Authorised notifiers may use these methods of contact to provide notification, early warnings and regular updates to premises owners and occupiers.

After the pollution incident has been contained and managed by key personnel and authorities, subsequent communication will be undertaken. This may include: Follow up telephone calls and/or face to face contact. Meetings with stakeholders and written correspondence containing updates pertaining to safety and Environmental concerns associated with the pollution incident.

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

1.19 IDENTIFICATION OF NEIGHBOURS

To assist the EPA in its decision on whether it needs to direct authorised notifiers at Leppington Dairy Facility to notify neighbours and to assist notifiers in visiting all the local neighbours, an aerial plan (refer – **Section 0**) is enclosed which identifies any commercial, industrial and residential properties within 500 m of the site boundary.



Implementation

1.20 EXISTING PLANS

The Site Manager must ensure that the storage location of the PIRMP on site is known by all staff members and is readily available upon request.

If the Site Manager should choose to file the PIRMP and the Supporting Statement in any document, it must be readily identifiable in that document in order to meet the requirements of Section 153D of the *POEO Act* and Section 98D *POEO(G) Regulation*.

1.21 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.

A register of staff training can be found in **Document E** in **Appendix A** and must be kept on site and updated regularly.

1.22 TESTING

The testing of the PIRMP will be undertaken to check that the information is accurate and current and that the plan is capable of being implemented in a workable and effective manner.

The PIRMP will be tested by assessing and reviewing it and making any necessary changes as identified. Testing could be deemed to be a desktop review or an environmental emergency drill procedure. Testing will include all components of the plan, including training.

A review of the PIRMP should occur every 12 months commencing from the date of issue.

The PIRMP will be reviewed following any pollution incident that occurs in the course of an activity. This review will be undertaken to provide the information included in the plan is accurate and up to date and the plan is still capable of being implemented in an effective manner. Information to be retained includes:

- the manner the test was done
- dates when the plan was tested
- the person/s who conducted the testing; and
- the date and description of any update or amendment to the plan.

1.23 REVIEW AND UPDATE PIRMP

The PIRMP is a living document required to be reviewed at least once every 12 months and updated if necessary. The PIRMP is also required to be reviewed 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 **Document D** 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:

- Leppington Dairy Facility Manager
- Liverpool City Council

References

Guidelines:
Pollution Incident Response Management Plans, March 2020 –
Prepared by NSW Environment Protection Authority

Appendix A

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN SUPPORTING STATEMENT

LEPPINGTON DAIRY FACILITY



Report Title:	<i>Pollution Incident Response Management Plan</i>
Project:	<i>Leppington Dairy Facility</i>
Company	<i>Leppington Pastoral Company</i>
Report Ref.:	<i>214187_PIRMP_002D.docx</i>
Status:	<i>Final</i>
Issued:	<i>28 May 2018</i>
Updated:	<i>5 October 2022</i>

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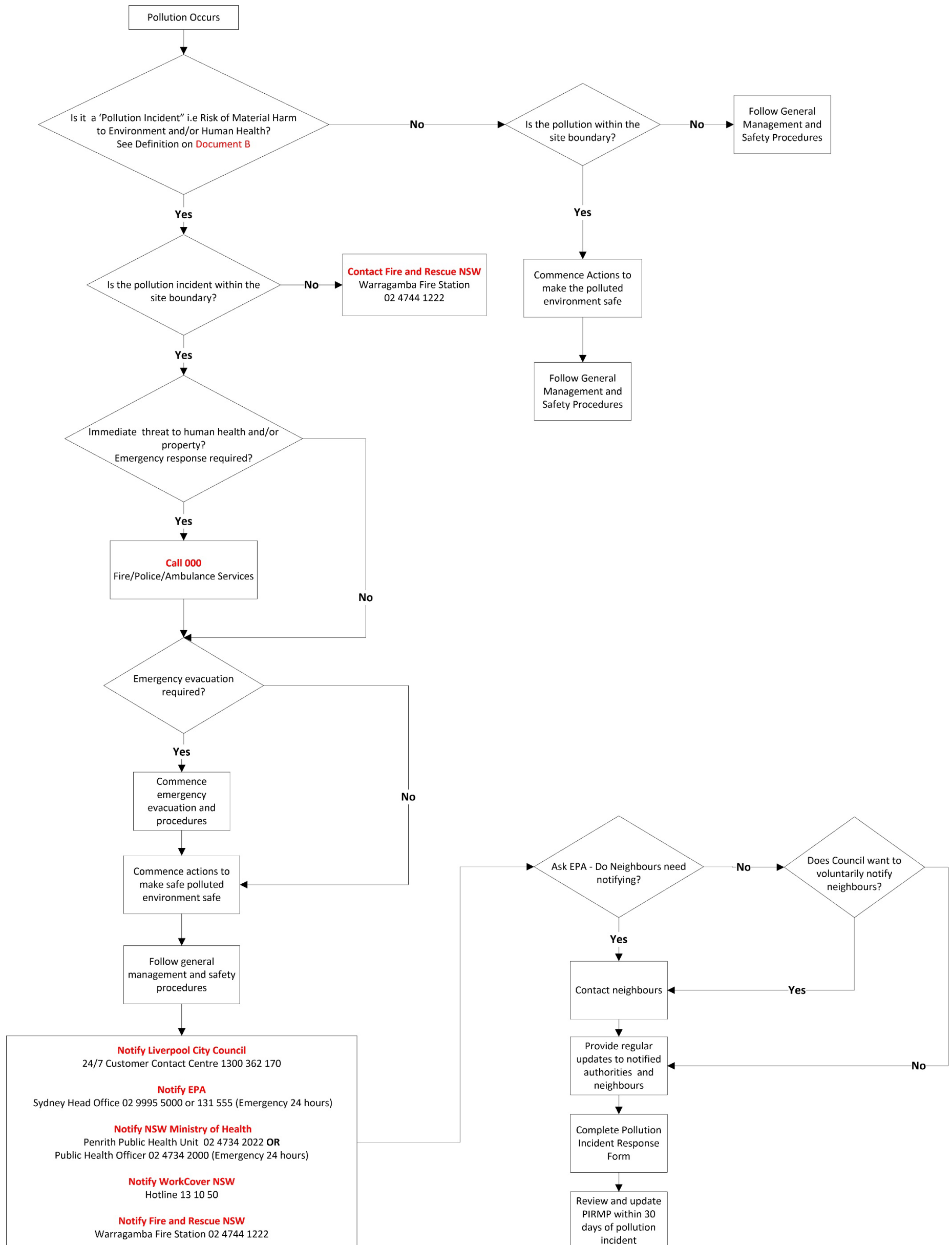
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TABLE	

1.0 POLLUTION INCIDENT CLASSIFICATION, RISK ASSESSMENT AND CONTRIBUTING FACTORS

Table 0.1 – Pollution Incident Classification, Risk Assessment and Contributing Factors

Description of Pollution Incident	Likelihood	Impact	Contributing Factors
Water pollution	Low	Medium	Insufficient monitoring, maintenance and management of effluent ponds/treatment systems and irrigation areas.
Soil contamination	Low	Medium	Insufficient monitoring, maintenance and management of effluent ponds and irrigation areas, and improper storage of possible contaminants.
Excessive odour	Low	Medium	Operational factors such as (i) insufficient monitoring, maintenance and management of effluent ponds and irrigation areas, (ii) insufficient flushing of free stall sheds and scraping of dry weather lots, and (iii) slow response to removal of waste materials such as wet feed or carcasses; and natural factors, the wind direction and velocity.
Excessive noise	Low	Medium	Insufficient maintenance of equipment and machinery, meteorological conditions that favour focusing of sound wave propagation, and livestock distress.
Excessive dust	Low	Medium	High winds, insufficient dust suppression, insufficient management of vegetation/pasture cover, and insufficient cleaning of the facility.
Biosecurity hazard	Low	High	Insufficient management, treatment and monitoring of introduced and existing livestock, not monitoring stock fencing, and lack of staff knowledge of biosecurity hazards and procedures.
Fire	Low	High	Natural factors include high winds, dry weather, prolonged high temperatures, low humidity, lightning strikes and spontaneous combustion. Human factors include poor maintenance of machinery and equipment.
Loss of fuels or oil	Low	Low	Poor maintenance of vehicles and machinery, and periods of high traffic flow. Failure of bunding or diesel storage tanks.
Acts of vandalism or target of terrorist activity	Low	Medium	Not maintaining fenced property boundaries and other site buildings, and not isolating equipment, vehicles and machinery that are not in use. Risk is also increased during hours of closure and during sustained periods of hot and dry weather.
Any other incident or observation that could potentially pose an immediate environmental hazard outside of normal operating conditions	Low	Low	N/A

DOCUMENT A - POLLUTION INCIDENT DECISION FLOW CHART



2.0 DOCUMENT B – POLLUTION INCIDENT EMERGENCY CONTACT DETAILS

2.1 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, 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.”*

2.2 NOTIFICATION OF POLLUTION INCIDENT

2.2.1 Notification speed

The notification of the relevant authority when material harm to the environment is caused or threatened must be ‘*immediate*’, meaning ‘*promptly without delay*’, but it does not mean undertaking notification ahead of doing what is necessary to make the environment safe.

2.2.2 Notification of relevant authorities

Where the pollution incident causes or threatens material harm to the environment or human health, the following authorities must be notified by those authorised to notify relevant authorities (see **Table 2.1**):

1. Emergency Call Services

- Emergency Hotline Number (24 hours) 000*

*The Site Supervisor should call 000 if the incident presents an immediate threat to human health and/or property and an emergency response is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below.

2. Liverpool City Council

- 24/7 Customer Contact Centre 1300 362 170

3. The Environment Protection Authority (EPA)

- Sydney Head Office 02 9995 5000
- Emergency Hotline Number 131 555

4. The Ministry of Health (via Public Health Units)

- Penrith Public Health Unit 02 4734 2022
- Public Health Officer on call (24 hours) 02 4734 2000

5. SafeWork NSW

- Hotline Number 13 10 50

6. Fire and Rescue NSW

- Warragamba Fire Station 02 4744 1222

**If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the site supervisor is still required to follow that outlined above except for dialling 000.

Table 0.2 – Authorised Notifiers of Pollution Incidents

Name	Position	Phone	Mobile
Michael Perich	Director	02 4773 4291	0409 911 369
Ron Perich	Director	02 4773 4291	0408 254 828
Karen Sutton	Compliance Officer Safety / Environment	02 4773 4291	0438 353 993

3.0 DOCUMENT C – POLLUTION INCIDENT REPORTING FORM

POLLUTION INCIDENT REPORTING FORM

INCIDENT NO:	TIME:						
DATE:	DURATION OF INCIDENT:						
NATURE OF INCIDENT: ----- ----- -----							
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">TEMPERATURE:°C</td> <td style="width: 50%; border: none;">WIND DIRECTION & SPEED:KM/HR</td> </tr> <tr> <td style="border: none;">RELATIVE HUMIDITY:%</td> <td style="border: none;">RAINFALL SINCE 9AM:MM</td> </tr> <tr> <td colspan="2" style="border: none;">FIRE DANGER RATING:</td> </tr> </table>		TEMPERATURE:°C	WIND DIRECTION & SPEED:KM/HR	RELATIVE HUMIDITY:%	RAINFALL SINCE 9AM:MM	FIRE DANGER RATING:	
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 (IF KNOWN): ----- ----- -----							
THE CIRCUMSTANCES IN WHICH THE INCIDENT OCCURRED, INCLUDING THE CAUSE OF THE INCIDENT (IF KNOWN): ----- ----- -----							
THE CORRECTIVE ACTION TAKEN OR PROPOSED TO BE TAKEN TO DEAL WITH THE INCIDENT AND ANY RESULTING POLLUTION OR THREATENED POLLUTION (IF KNOWN): ----- ----- -----							

HAS COUNCIL BEEN NOTIFIED?	YES	NO
HAS ENVIRONMENT PROTECTION AUTHORITY (EPA) BEEN NOTIFIED?	YES	NO
HAS NSW MINISTRY OF HEALTH (VIA PUBLIC HEALTH UNITS) BEEN NOTIFIED?	YES	NO
HAS SAFEWORK NSW BEEN NOTIFIED?	YES	NO
HAS LOCAL FIRE AND RESCUE NSW BEEN NOTIFIED?	YES	NO

HAS EPA DIRECTED LPC TO NOTIFY NEIGHBOURS?	YES	NO
IF NOT, HAS LPC VOLUNTARILY NOTIFIED NEIGHBOURS?	YES	NO

Signature:	Date:
Signature:	Date:
Site Manager, Leppington Dairy Facility	

4.0 DOCUMENT D – PIRMP TESTING & UPDATE REGISTER

Date	Name	Routine Testing	Routine Update	Post Incident Updates	New Copies Distributed?
27/7/15	Chloe Bigg	N/A	Update PIRMP and PIRMP Supporting Statement content.	N/A	Yes
1/5/18	Chloe Bigg	N/A	Updating PIRMP and PIRMP Supporting Statement to reflect current operations and WHS practises.	N/A	Yes
1/9/20	Geoff Delaney Brett Norman	Tested environmental risk components. <i>Table 1.1</i> Followed PIMRP, Pollution Incident Decision Flow chart, notification requirements and Emergency Response Plan	Update to align with EPA NSW PIMRP Guidelines 2020.	N/A	Yes
12/10/21	Geoff Delaney Brett Norman	Desk top testing and document review	Due to no changes the September 2020 copy is current and still available	N/A	No
05/10/22	Karen Sutton	Document Review,	Changes Update	N/A	NO

5.0 DOCUMENT E – STAFF TRAINING REGISTER

Date	Staff Member	Brief Description of Training Task
1/9/20	Brett Norman (Farm Manager)	Review and follow PIRMP including Emergency Response Plan implementing controls, and notifications
12/10/2021	Brett Norman (Farm Manager)	Review and follow PIRMP including Emergency Response Plan implementing controls, and notifications in the event of a real scenario.