

**COONAMBLE**  
SHIRE COUNCIL

**COONAMBLE REGIONAL LIVESTOCK  
MARKET POLLUTION INCIDENT  
RESPONSE MANAGEMENT PLAN 2022**

EPA Licence 10694

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## 1 INTRODUCTION

### 1.1 Coonamble Livestock Market

Coonamble Shire Council (Council) operates the Coonamble Regional Livestock Market ('Coonamble Saleyards'). The Coonamble Saleyard located at 79 Railway Street, Coonamble is an important part of the Coonamble Shire's rich agricultural economy. The facility is owned by Coonamble Shire Council with operation and maintenance carried out by Council staff prior to the sale and Council staff providing some operational services during a sale.

### 1.2 Purpose

This Pollution Incident Response Management Plan (PIRMP) has 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 (EPA's) Guidelines: Preparation of Pollution Incident Response Management Plans, 2020.

This legislation stipulates that all holders of environment protection licenses must prepare a plan to manage pollution incident responses. The plan must be prepared in a form detailed in the associated Regulation and be kept on the premises to which the license relates.

The objectives of this PIRMP are:

- To ensure comprehensive and timely communication about a pollution incident to staff at the premises, other Council staff as appropriate, the Environment Protection Authority (EPA), other relevant authorities and the community that may be affected by impacts of the incident.
- Minimise and control risk of a pollution incident by identifying risks and developing planned actions to manage those risks.
- Actions to be taken to reduce and/or control pollution.
- Ensure that this PIRMP is effectively implemented by trained staff, identifying persons responsible for implementing it, and regularly testing and reviewing it to ensure that it is current and suitable.

### 1.3 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 Protection of the Environment Operations Act 1997 (POEO Act):

- (a) Harm to the environment is material if:
  - i. It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

- ii. It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

#### **1.4 Identified Pollution Incident Risks and Potential Hazards**

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

- Overflow animal waste (Effluent) to the environment.
- Stormwater contamination when it comes into contact with animal holding pens and sludge stockpiles.
- Stormwater from truck wash.
- Identification of any failure of an environmental protection system due to solid waste (Manure is generated in animal holding areas, Primary and secondary effluent treatment sludges are generated in the treatment ponds, etc) generating in the saleyard.
- Odour (Odours in animal holding pens are produced by manure and urine).
- Noises which are generated by several sources (animals, especially when in concentrated groups, machinery, plant and service vehicles, heavy vehicles, crowds, etc).
- Potential of the transmission of zoonotic diseases (such as Q-fever, leptospirosis, and anthrax) to humans (People who have had directly contact with infected stock/animals).
- Any other incident or observation that could potentially pose an immediate environmental /human hazard outside normal operating conditions.

#### ***Compliance with POEO General Regulation***

s. 98(c)(1)(a) – “a description of the hazards to human health or the environment associated with the environment to which the licence relates (the relevant activity).”

## 2 SITE OVERVIEW

### 2.1 Site Overview

The Coonamble Regional Livestock Market is located on Railway St, Coonamble. Fat and store Cattle sales are conducted on as needs basis.

The Environment Protection Authority (EPA) has issued Environment Protection Licence 10694 for the Coonamble Regional Livestock Market. Under this licence, reportable incidents are causing or threatening, material environmental harm to the environment which is set out in accordance with Section 5.7 of the POEO Act 1997.

The licence requires that the total quantity of animal accommodation at the premises must not exceed 60000 T.

#### ***Compliance with POEO General Regulation***

s. 98(c)(1)(e) – “the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.”

### 2.2 Site Characteristics

The Coonamble Saleyards is located at Railway Street, Coonamble approximately 1.5 km from the town's centre. The yards cover an area of approximately 7500 sq metres. The immediate environment is mixed low density residential and light industrial use. There is a public railway line located along the western boundary of the property, effectively preventing future expansion in that direction. **(Site Locality Plan is attached in Appendix A).**

### **3 RISK MANAGEMENT AND PRE-EMPTIVE ACTIONS**

#### **3.1 Likelihood, Impact and Contributing Factors to Pollution Incidents Occurring**

Information regarding the likelihood of any such hazards occurring, including details of any conditions or events that could, or would increase the likelihood. Incidents can be classified as being of low, medium or high risk of occurring (likelihood) based on the past history of the facility, an assessment of management procedures, staff training and site layout.

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

Risk assessments were previously conducted by Council staff and information on the main hazards through this process, along with control measures to minimise the occurrence and consequences (people and environment) of the identified risks are outlined in Table One. Table Two provides a risk rating table.

#### ***Compliance with POEO General Regulation***

s. 98(c)(1)(b) – “the likelihood of any such hazards occurring, including details of any conditions or events that could, or would increase the likelihood.”

s.98(c)(1)(c) – “details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity.”

**Table One: Risk Management and Pre-Emptive Actions**

Pollution Incident	Contributing Factors	Impact	Risk Rating (LxC=)	Controls
Overflow animal waste (Effluent) to the environment	Prolonged periods of heavy rain and lack of site maintenance	Land contamination	B2 , LOW	Pre-sale inspections, regular onsite maintenance of animal waste (effluent) collection ponds.
Stormwater contamination when it comes into contact with animal holding pens and sludge stockpiles	Prolonged periods of heavy rain and lack of site maintenance	Land contamination	B2, LOW	Pre-sale inspections, regular onsite maintenance including large air compressor to blow gravel and washing of pens after sale and regular drain clean out.
Identification of any failure of an environmental protection system due to solid waste (Manure is generated in animal holding areas, Primary and secondary effluent treatment sludges are generated in the treatment ponds, etc) generating in the saleyard	Prolonged periods of heavy rain and lack of site maintenance	Land contamination	B2, LOW	Pre-sale inspections, regular onsite maintenance including large air compressor to blow gravel and washing of pens after sale and regular drain clean out. Maintain number of head per sale.
Identification of a significant difference in soil parameters where treated effluent discharge areas	Prolonged periods of heavy rain and lack of monitoring	Land contamination	A2, LOW	Pre-sale inspection, request soil testing as required.
Odours from animals in holding pens are produced by manure and urine)	Lack of site operation and maintenance, extreme weather condition (high wind)	Effect the people on site and the surrounding neighbourhood, Air pollution	A1, LOW	Pre-sale inspection, regular onsite operation and maintenance such as cleaning of pens.
Potential of the transmission of zoonotic diseases (such as Q-fever, Lepto and anthrax) to humans (People who have had directly contact with infected stock/animals).	Lack of knowledge to follow the safety procedures on-site. Lack of immunisation.	Health issues for the people who are onsite	B3, MODERATE	Vaccination offered for Council staff. We encourage the Saleyard users to have cattle vaccinated until it is mandated.
Stormwater contamination from truck wash	Prolonged periods of heavy rain and lack of site maintenance	Land contamination	B2, LOW	Truck wash inspections and regular onsite maintenance.

**Table Two: Risk Rating Table**

Likelihood of Occurrence	Consequences	Rating	Rank	Likelihood				
				A	B	C	D	E
<b>A — IMPROBABLE</b> May occur only in exceptional circumstances	<b>1. INSIGNIFICANT</b> No injuries, minimal level of pollution, Employee grievances dealt with on site, Loss <5%of job cost. Services , business failure resulting in delay < 1 week and costs plant/equipment loss < \$ 1,000	<b>L - Low</b>	<b>1</b>	L	L	L	M	H
<b>B — REMOTE</b> Could occur at some time	<b>2. MINOR</b> First Aid treatment, limited / localised impact, Employee grievances dealt with senior management, Loss 5 -10% of job cost. business failure resulting in delay < 1 month and costs plant/equipment loss <\$ 10,000	<b>M - Medium</b>	<b>2</b>	L	L	M	H	V
<b>C — OCCASIONAL</b> Might occur at some time	<b>3. MODERATE</b> Medical treatment & several days off work, significant pollution requiring outside assistance, Employee grievances taken to the union, Loss 10 - 20% of job cost. Non compliance with legislations/Licence conditions, business failure resulting in delay < 3 months and costs plant/equipment loss < \$ 50,000	<b>H - High</b>	<b>3</b>	M	M	H	V	X
<b>D — FREQUENT</b> Will probably occur in most circumstances	<b>4. MAJOR</b> Long term illness/serious injury, significant pollution requiring outside assistance and long term environmental damage, Threatened industrial action, Loss 20 - 70% of job cost. Loss of production capability, Order placed on Council by Authorities, business failure resulting in delay < 6 months and costs plant/equipment loss < \$ 100,000	<b>V - Very High</b>	<b>4</b>	H	H	V	X	X
<b>E — CONTINUOUS</b> Is expected to occur in most circumstances	<b>5. CATASTROPHIC</b> Death or permanent disability illness, serious permanent environmental damage, Actual industrial action, Loss > 70% of job cost. Potential prosecution by Authorities, business failure resulting in delay >6 months and costs plant/equipment loss > \$ 100,000	<b>X-Extreme</b>	<b>5</b>	V	V	X	X	X



## 4 INVENTORY OF POTENTIAL POLLUTANTS

Untreated effluent is the potential pollutant of concern for the site. This can lead to several pollutant incidents identified earlier in Table 1.

### ***Compliance with POEO General Regulation***

s.98(c)(1)(d) – “an inventory of potential pollutants on the premises or used in carrying out the relevant activity.”

#### **4.1 POEO Act Definitions**

A pollution incident is defined by the Protection of the Environment Operations Act (1997) as:

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

Material harm is defined by the POEO Act (1997) under Chapter 5, Part 5.7, Section 147 and described above at s. 1.3.

## 5 SITE SAFETY EQUIPMENT

The Coonamble Saleyards is protected from fire using fire extinguishers. Personal Protective Equipment (PPE) is provided for onsite staff which consists of:

- Ear/hearing protection & Safety Glasses
- Sunscreen & Broad Brimmed Hats
- Rubber Gloves & Clothing
- Gumboots & Steel capped Boots

### ***Compliance with POEO General Regulation***

s.98(c)(1)(f) – “a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.”

**6 NOTIFICATION OF POLLUTION INCIDENTS**

**6.1 Immediate Notification Incident**

The requirement for notification of a pollution incident has changed from 'as soon as practicable' to 'immediately' (section 148 of the POEO Act 1997). In short, 'immediately' means 'promptly without delay', but it does not mean undertaking notification ahead of doing what is necessary to make safe.

The risk assessment outlined in Table One shows several potential pollution incidents that may occur. The following figure outlines the procedure for Council responding to a notification of an incident.

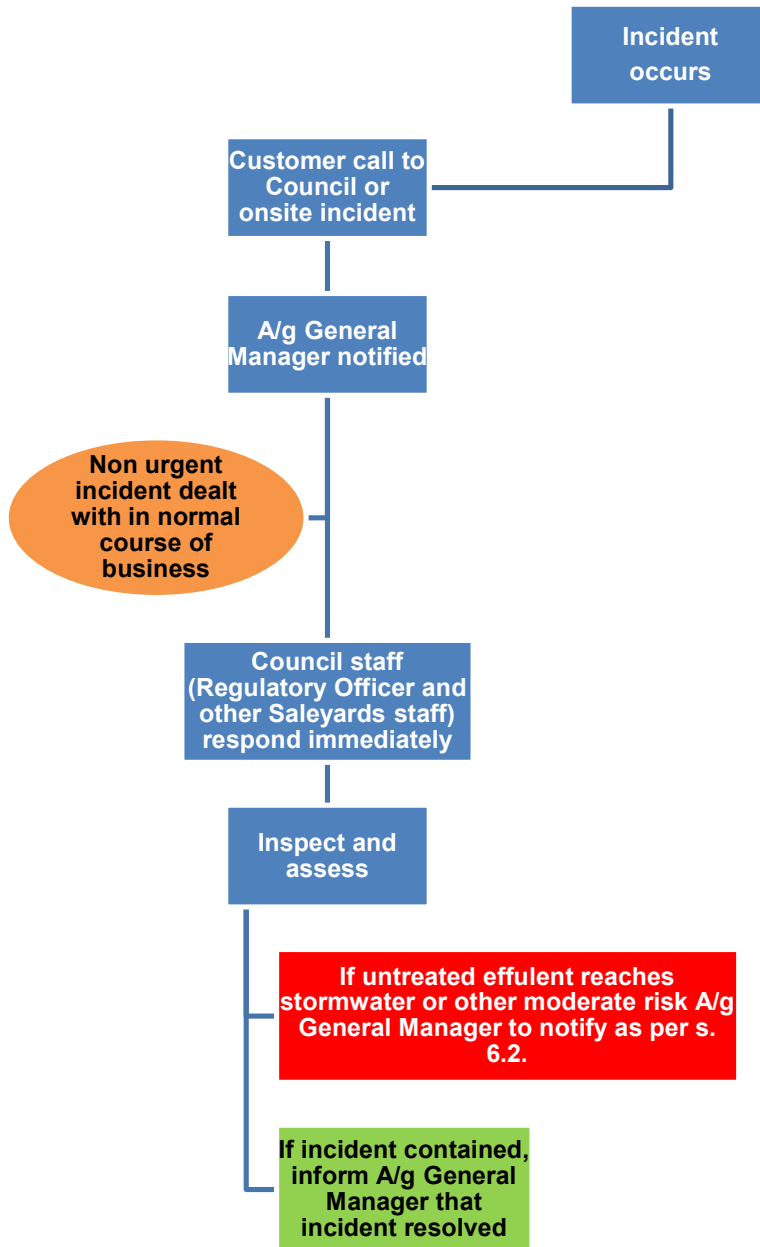


Figure 1: Incident Notification and Action Process  
COONAMBLE LIVESTOCK MARKET PIRMP

## 6.2 Responsible Key Person(s) for Notification

Table Three provides an overview of responsible key person for notification.

**Table Three: Responsible Key Person(s) for Notification**

	<b>Name</b>	<b>Position</b>	<b>Contact Detail</b>
<b>Person who is responsible for and authorised to activate plan</b>	Bruce Quarmby	A/g General Manager	0427 221 449
<b>Person who is authorised to liaise with the relevant authority</b>	Bruce Quarmby	A/g General Manager	0427 221 449
<b>Person who is responsible for managing the response to a pollution incident</b>	Bruce Quarmby	A/g General Manager	0427 221 449

## 6.3 Incident Contact Details – Council

Contact details for Council personnel are provided below in Table Four.

**Table Four: Incident Contact Details – Coonamble Shire Council**

<b>Name</b>	<b>Role</b>	<b>Contact Number</b>
Robert Tosh	Regulatory Officer	0427 255 881
	Manager Building and Compliance (Vacant)	
	Executive Leader Environment ESPC (Vacant)	
Bruce Quarmby	A/g General Manager	0427 221 449
Council Emergency Contact Number (On Call Number)		0428 217 420
Council landline (business hours)		02 6827 1900
Amanda Nixon	Manager People Risk and Improvement (or WHS)	0497 000 439
	Grants and Communications Officer	02 6827 1900

#### 6.4 Notification of Relevant Authorities

Where the pollution incident causes or threatens material harm to the environment or human health, all the following authorities (external) have been provided below and will apply depending on the nature of the incident.

**Table Five: Incident Contact Details – External Relevant Authorities**

Relevant Authority	Contact
<b>Emergency Call Services</b>  (land line) (Using a mobile)  (The site supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. Fire, Ambulance, Police) and then notify all other parties below.	<b>000</b> <b>112</b>
<b>Environmental Protection Authority</b> Emergency Hotline (24/7)	<b>131555</b>
<b>NSW Ministry of Health (via Public Health Unit)</b> NSW Hotline Dubbo Regional Office After hours	<b>1300 066 055</b> <b>(02) 6809 8979</b> <b>0418 866 397</b>
<b>Safework NSW</b> Hotline	<b>13 10 50</b>
<p align="center"><b>If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the Saleyards Supervisor is still required to follow that outlined above except for dialing 000</b></p>	

\*Saleyard Supervisor refers to Council person in charge at the time of the event.

#### 6.5 Information to be Notified

Under the section 150(1) of the POEO Act 1997, outlines the relevant information to be given when a pollution incident is notified:

- 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, the estimated quantity or volume and the concentration of any pollutant involved (if known)
- The circumstances in which the incident occurred, including the cause of the incident (if known)
- The actions taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution (if known), and
- Other information prescribed by the regulations

Notification is required by the Saleyards Supervisor 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.

A **Pollution Incident Reporting Form** is attached in **Appendix B**.

### **6.6 Actions to be Taken During or Immediately After a Pollution Incident**

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

In the event of a pollution incident occurring all members of the public and other contractor's staff will be mustered to the Emergency Assembly point, after which they will be safely evacuated from site where appropriate. It is a condition of entry that in the event of an emergency, both the public and staff must adhere to directions given by the Saleyards Supervisor.

Where the pollution incident causes or threatens material harm to the environment or human health, the EPA is notified in accordance with **Section 6.4**. Once the EPA is notified, it is then for the EPA to determine whether commercial, industrial and residential neighbours of the site need to be contacted by Council and informed of the circumstances of the incident and what action is being taken to response to it.

If deemed necessary, the EPA then has powers to formally direct Council to notify the neighbours of the site. Irrespective of whether the EPA directs the Council to notify the neighbours and depending on the circumstances of the particular pollution incident, the Council may at their own discretion voluntarily choose to notify neighbours. Notification and communication methods will be determined on a case-by-case basis and the following methods can be used;

- Phone Calls
- Media Releases (Radio/Newspaper/Internet, etc)
- Site visits/Door knocking
- Letter drops
- Warning Signs
- Other methods as the situation requires.

## 6.7 Incident Investigation

All emergencies must be investigated. For all other incidents, the A/g General Manager (with guidance of Saleyard Supervisor) will decide whether an incident investigation will be conducted. When an incident investigation is required, the A/g General Manager is responsible for, forming the investigation team and Co-ordinating the investigation.

### ***Compliance with POEO General Regulation***

s.98(c)(1)(g) - the names, positions and 24-hour contact details of those key individuals who:

- (i) are responsible for activating the plan, and
  - (ii) are authorised to notify relevant authorities under section 148 of the Act, and
  - (iii) are responsible for managing the response to a pollution incident,
- h) the contact details of each relevant authority referred to in section 148 of the Act,
- i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,
- j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on.

## **7 IMPLEMENTATION**

### **7.1 Responsibility**

Council's A/g General Manager is responsible for the implementation of this plan.

### **7.2 Staff Training and Site Induction**

All the staff members at the facility should be inducted and the induction must cover the purpose, requirements, and responsibilities details in the PIRMP.

All staff should receive sufficient on the job training to enable them to carry out their assigned duties in a complete and safe manner,

- Staff must be capable of identifying potential pollution incidents
- Staff must be familiar with the requirements and procedures contained within this PIRMP

At least once every year staff should undertake a simulated pollution incident response exercise, including with emergency services, to familiarise site personnel with the requirements of this management plan.

Saleyard Agents and users of the facilities should also be made aware of the PIRMP. Work, health and safety documentation of the different businesses that utilise the Saleyards should also be provided to Council for Council's records.

### **7.3 Testing the PIRMP**

Testing the PIRMP is clearly set out in s. 2.2.3 of the NSW EPA Guideline. The Saleyard PIRMP is to be tested via the following avenues:

- (1) Desktop exercise which informs the s. 7.4 of this PIRMP to Review and Update the PIRMP conducted at a minimum of every 12 months.
  - a. This should occur every June of every year.
- (2) Scenario testing with practical exercises or drills once every three years.

### **7.4 Notification of Testing**

Operational Council employees will be notified of the two types of testing listed above in 7.3 by the A/g General Manager. Advance notification will occur at the best of Council's ability two to four weeks prior to the testing. Notification will occur by phone and/or email.

Where the users (i.e. the saleyard agents and their staff) are required for the testing, advance notification will occur at the best of Council's ability two to four weeks prior to testing. Notification will be through the A/g General Manager.

### **7.5 Review and Update PIRMP**

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

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. Revised and updated versions of the PIRMP will always be issued.



**APPENDIX A – SITE PLAN**

AERIAL



This is an indicative plan only.

**APPENDIX B – POLLUTION INCIDENT RESPONSE REPORTING FORM**

<b>Date</b>		<b>Time</b>	
<b>Location of incident</b>			
<b>Nature of incident</b>			
<b>Duration of incident</b>			
<b>Estimated volume</b>			
<b>How the incident occurred</b>			
<b>Action taken</b>			
<b>Further action proposed</b>			
<b>Other relevant Notes</b>			
<b>Person making notification</b>		<b>Signed</b>	

<b>COONAMBLE LIVESTOCK REGIONAL MARKET POLLUTION INCIDENT RESPONSE PLAN</b>		
<b>Department: Environment, Strategic Planning and Community</b>		
<b>Version</b>	<b>Date</b>	<b>Author/Comments</b>
1.0		
2.0	2019	Director of Engineering Services
2.1	23/8/2021	Reviewed by Executive Leader Environment, Strategic Planning and Community
2.2	30/8/2021	Additional information on testing as per advice from EPA (dated 25/8/2021)
2.3	23/9/2021	Reviewed by PIRMP Review Group
3.0	27/9/2021	Issued
3.1	30/5/2022	Reviewed by Executive Leader Environment, Strategic Planning and Community
3.2	17/6/2022	Reviewed by PIRMP Review Group and amended
<p><b>Review Date:</b> In alignment with PIRMP testing requirements, this document should be reviewed at least once every 12 months and/or must be tested within one month of any pollution incident. September 2022</p>		
<p><b>Amendments in the release:</b> Amendments include new Council template and acknowledging the NSW EPA Guideline: PIRMP and adding in references to s. 98(c)(1) to link to its need for compliance.</p>		
<b>Section Title</b>	<b>Section Number</b>	<b>Amendment History</b>
Various	Various	Replace Executive Leader Environment, Strategic Planning and Community with Acting General Manager due to impending vacancy.
Various	Various	Replace Ranger to Regulatory Officer due to permanency of this position.
Site Safety Equipment	5	Remove fire hose reel.
Site Plan	Appendix A	Amended to reflect onsite verification.
Review References		Addition to include sign in process and update on reviews and testing.
<p><b>Annexure Attached:</b> Appendix A – Site Plan Appendix B – Pollution Incident Response Reporting Form</p>		
<p><b>General Manager</b></p>		



## **2022 Scenario Testing**

**Scenario Testing Date:** 10 May 2022 and 16 June 2022

### **Scenarios Tested:**

1. Overflow animal waste (effluent) to the environment.
2. Stormwater contamination when it comes into contact with animal holding pens and sludge stockpiles.
3. Identification of any failure of an environmental protection system due to solid waste generating in the saleyard.
4. Odours from animals in holding.

<b>Coonamble Shire Council Internal Memo</b>	<b>Document ID – 100177</b>	<b>Registered to S-1</b>
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