



Lord Howe Island Board Waste Management Facility

Pollution Incident Response Plan

June 2023

V1.R9

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Document Control

Version Number	Revision Number	Description	Date of Approval	Planned Date of Review	Actual Date of Review
1	0	LHI WMF PIRP initial release	August 2012	August 2013	March 2013
	1	Inclusion of new number for incidents related to Fire and Rescue	March 2013	March 2014	August 2014
	2	Updated contact details for LHIB	August 2014		June 2018
	3	Updated all contact details	June 2018		August 2018
	4	Updated all contact details	August 2018	July 2019	June 2019
	5	Updated LHIB contact details	June 2019	June 2020	July 2020
	6	Updated Response Details; Updated all contact details; Updated Waste Storage Volumes; Minor change to risk assessment table Schedule C (chemical, oil and effluent spill items)	July 2020	June 2021	June 2021
	7	Update to contact details	June 2021	June 2022	June 2022
	8	Update to contact details. Update to position descriptions. Update to Safety Measures.	June 2022	June 2023	June 2023
	9	Update to contact details. Update to position descriptions. Update to Safety Measures.	June 2023	June 2024	

Pollution Incident Control Plan – Record of Testing

Date	Description of test	Actions arising	Date action closed off
29/07/2015	Oil Spill	Contact details to be updated	June 2018
06/06/2017	Chemical Spill and Associated Fire		
06/06/2018	Oil Spill	Contact details to be updated	June 2018
14/05/2019	Fire in Green Waste Area	LHIB Contact details to be updated	June 2019
22/05/2020	Liquid Hazardous Waste Spill (Effluent)	Updates required for Response Details, All Contact Details & Waste Storage Volumes	July 2020
07/06/2021	Fire in 'HotRot' – in vessel	Contact details update x 2 personnel	June 2021
13/05/2022	Liquid Hazardous Waste Spill (Used Engine Oil)	Update to contact details. Update to position descriptions. Update to Safety Measures.	June 2022
28/06/2023	Oil Spill – engine and machinery	Contact details update x 4 personnel	June 2023

Introduction

The Protection of the Environment Operations Act 1997 requires the holder of an environment protection licence to prepare a pollution incident response management plan that complies with the Act in relation to the activities to which the licence relates.

Background

The Lord Howe Island Board operates a Waste Management Facility under Environment Protection Licence 10466 issued under the Protection of the Environment Operations Act 1997 (“the Act”). The licence authorises the carrying out of Scheduled Activity.

Changes to environment protection legislation as a result of the Protection of the Environment Legislation Amendment Act 2011 (Amendment Act) came into effect early in 2012. The Amendment Act introduces several changes to improve the way pollution incidents are reported and managed. These changes apply to all holders of an environment protection licence.

One of the changes requires the holders of a licence to prepare and implement pollution incident response management plans.

The LHIB Waste Management Facility Pollution Incident Response Plan

The LHIB WMF Pollution Incident Response Plan (PIRP) has been prepared to meet the requirements set out in the Act. The PIRP has been developed in the form required by the regulations and includes the following:

- a. the procedures to be followed by the LHIB in notifying a pollution incident to:
 - i. the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and
 - ii. the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and
 - iii. any persons or authorities required to be notified by Part 5.7,
- b. a detailed description of the action to be taken, immediately after a pollution incident, by the LHIB to reduce or control any pollution,
- c. the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,
- d. any other matter required by the regulations.

The following matters as required under section 153C (d) of the Act are included in the PIRP:

- a. a description of the hazards to human health or the environment associated with the activity to which the licence relates (the **relevant activity**),
- b. the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,

- 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,
- d. an inventory of potential pollutants on the premises or used in carrying out the relevant activity,
- 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,
- 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,
- g. the names, positions and 24-hour contact details of those key individuals who:
 - h. are responsible for activating the plan, and
 - i. are authorised to notify relevant authorities under section 148 of the Act, and
 - j. are responsible for managing the response to a pollution incident,
- k. the contact details of each relevant authority referred to in section 148 of the Act,
- l. 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,
- m. 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,
- n. a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,
- o. a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,
- p. the nature and objectives of any staff training program in relation to the plan,
- q. the dates on which the plan has been tested and the name of the person who carried out the test,
- r. the dates on which the plan is updated,
- s. the manner in which the plan is to be tested and maintained

Location of the PIRP

The PIRP is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place being the LHI Waste Management Facility, and is made available in accordance with the regulations.

Testing of plan

LHIB will test the PIRP in accordance with the regulations. The PIRP will be tested at least once every 12 months and within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the

information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Implementation of PIRP

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the Act) is caused or threatened, the LHIB must immediately implement any pollution incident response management plan in relation to the activity.

Components of the Plan

Schedule A details the response for an incident

Schedule B to this Plan details the Pollutants on the Premises

Schedule C is a Risk assessment of pollution incidents

Schedule D provides details 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.

Schedule E details the roles and responsibilities of Individuals under this plan and includes contact list of relevant authorities

Schedule F is a Map showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises

Schedule A - The Response Plan

Introduction

In the event of a pollution incident that has the possibility of causing harm to the environment or public health this plan is to be implemented

Trigger to Implement the Plan

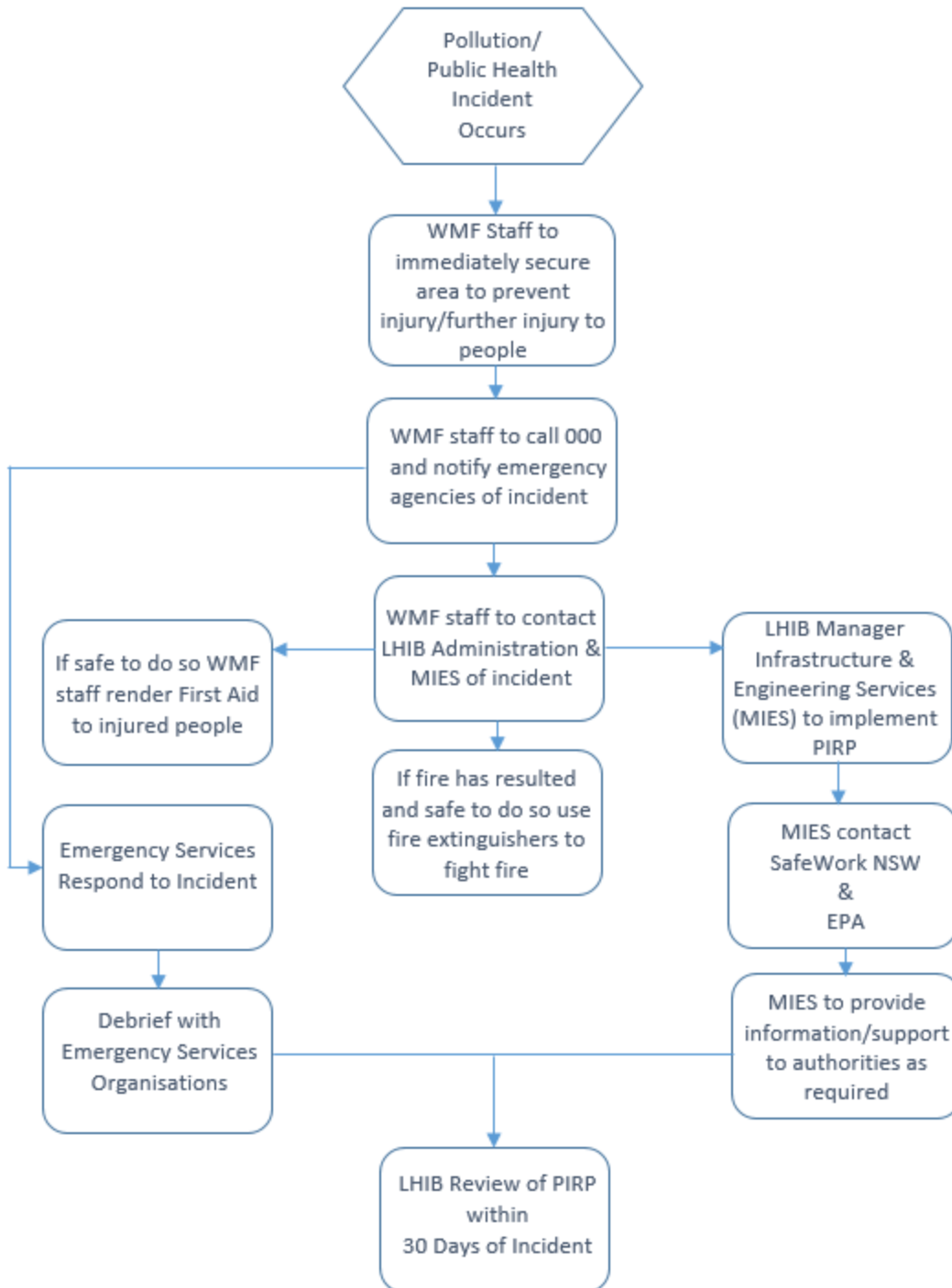
The LHI Waste Management Facility does not generally manage materials that are likely to cause a significant environmental or public health risk. However there is the possibility that high risk materials may arrive at the facility or that an incident may occur as a result of the operations of the WMF. The Risk assessment (schedule C) identifies incidents that trigger this Plan.

Incident

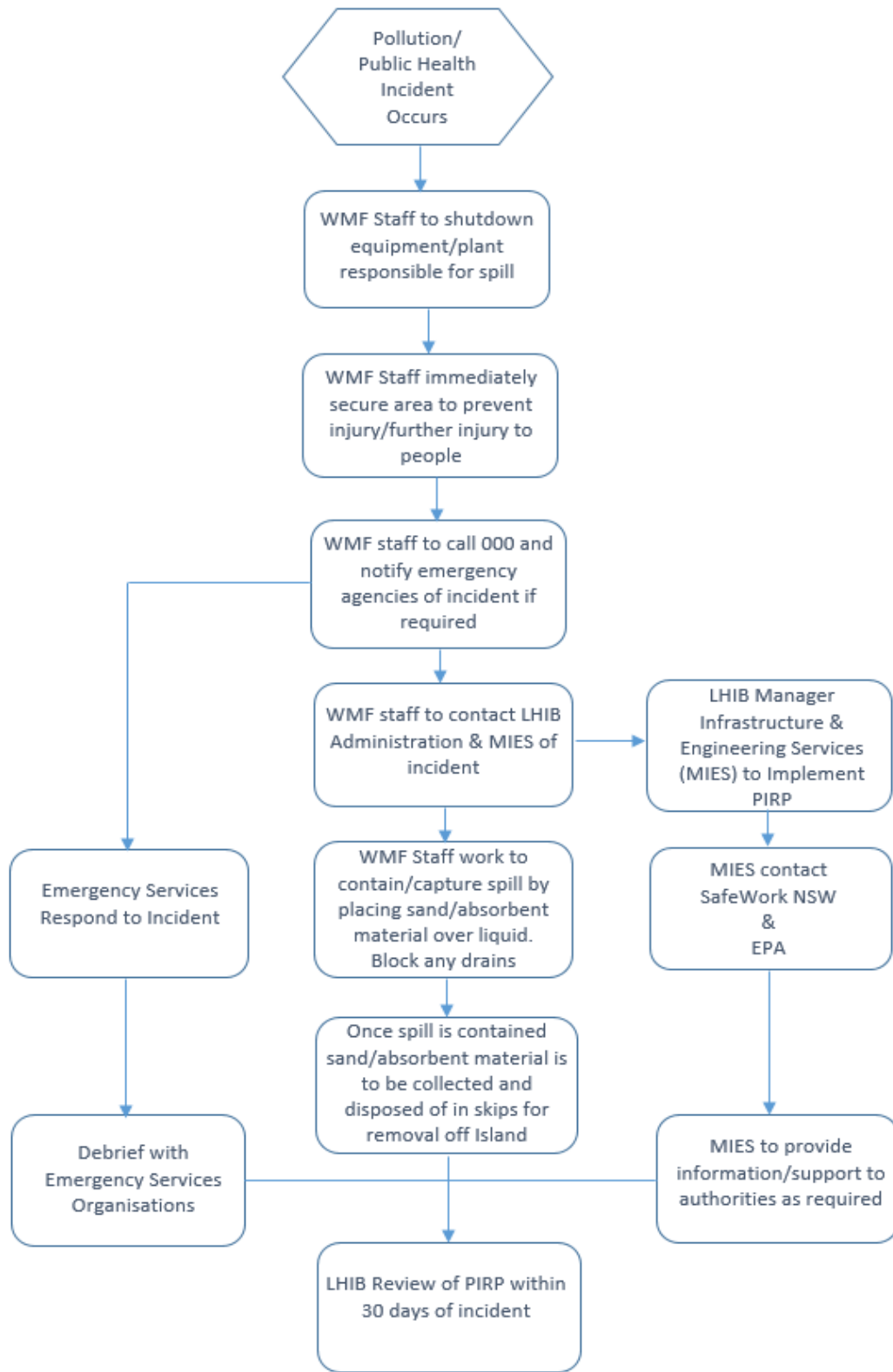
Response details have been developed to cover the following incidents:

- Explosion at WMF – page 7
- Contamination of groundwater/lagoon by liquids within the WMF – page 8
- Contamination of groundwater/lagoon by liquids during transport to ship – page 9
- Uncontrolled/Unplanned Fire at the WMF – page 10

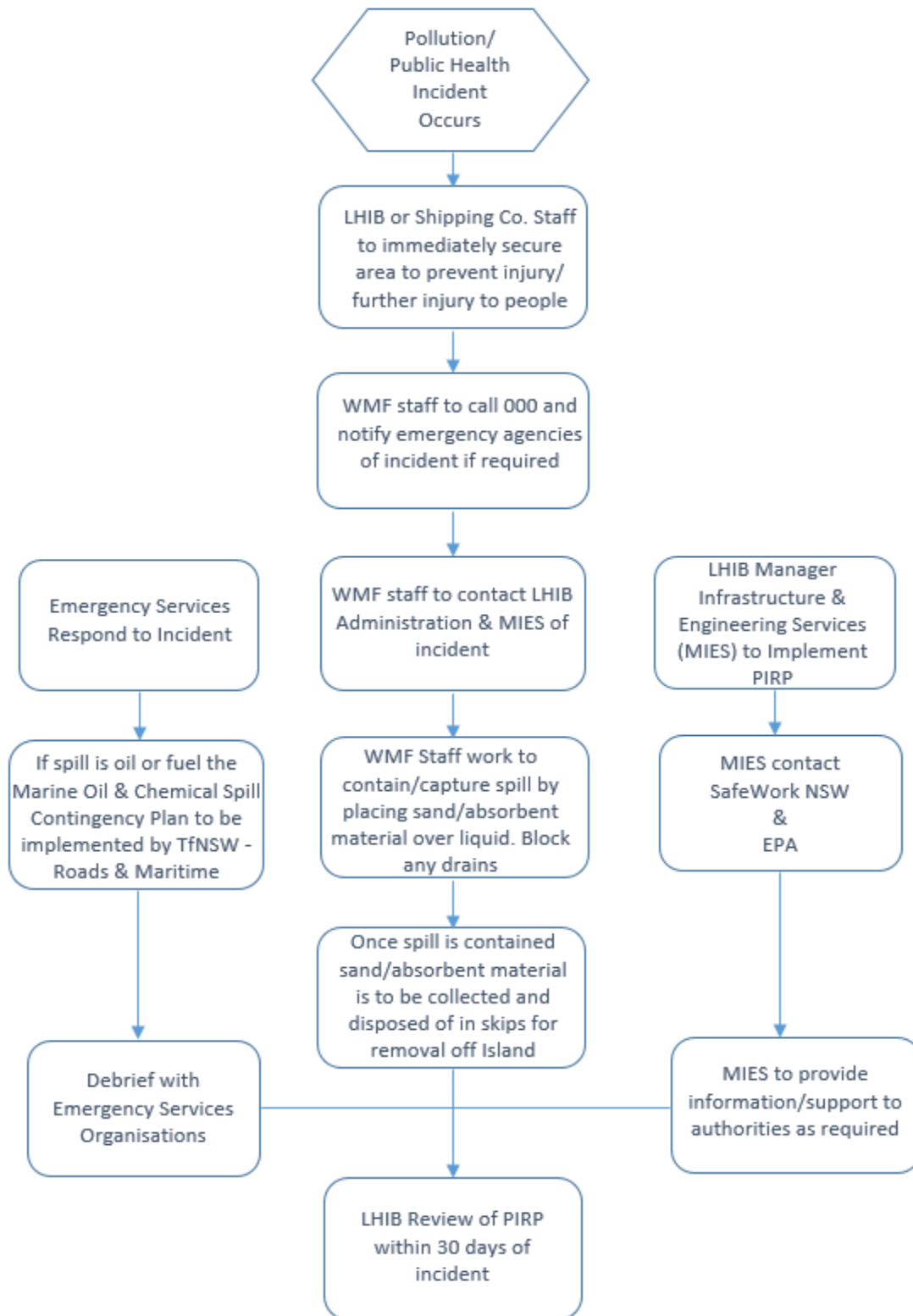
Incident – Explosion at WMF



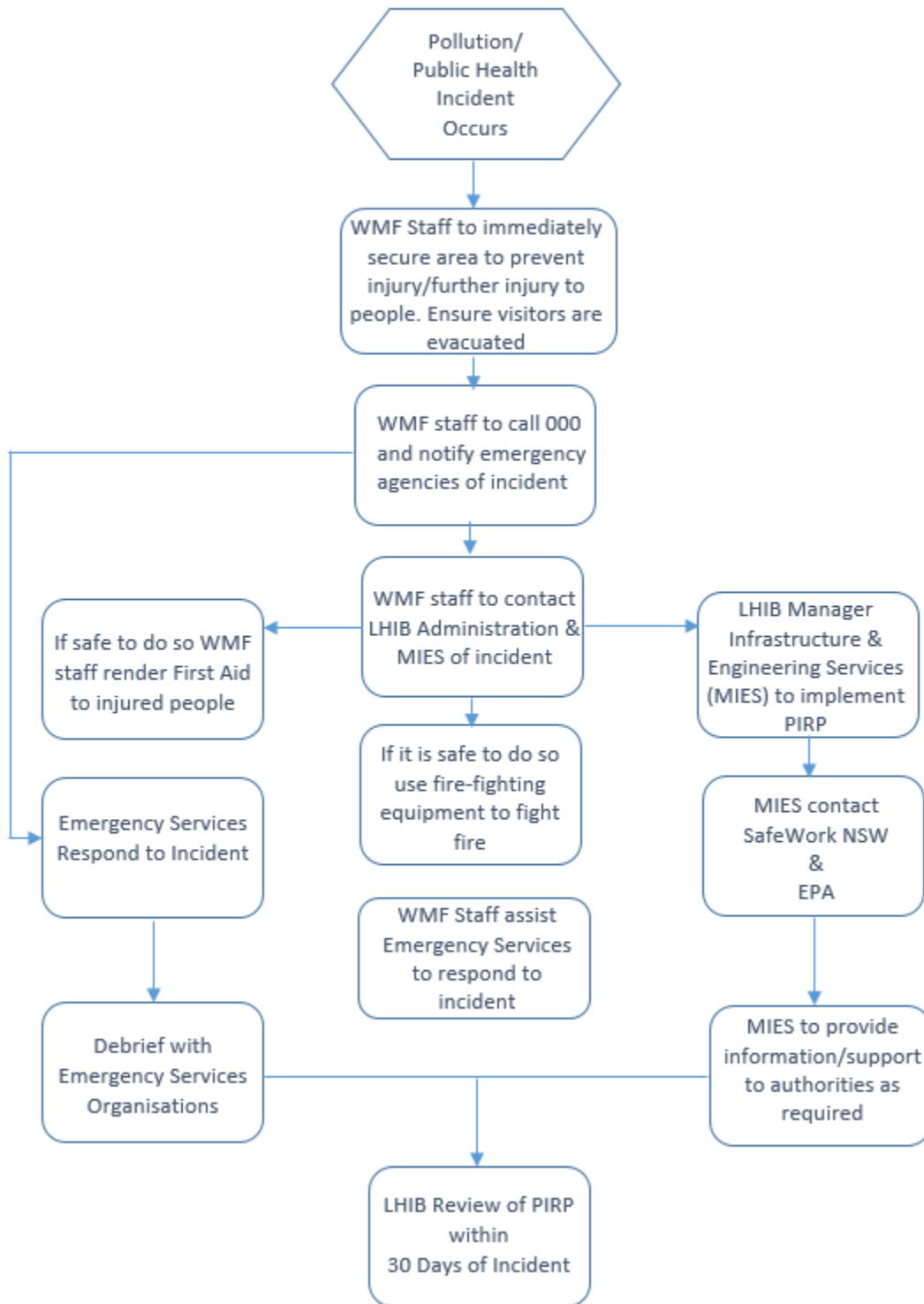
Incident - Contamination of groundwater/lagoon by liquids within the WMF



Incident – Contamination of groundwater/lagoon by liquids during transport to ship



Incident – Uncontrolled/Unplanned Fire at WMF



Schedule B – List of Pollutants at LHI WMF

Pollutant	Description	Max Volume stored on site
Liquids		
Septage/effluent	Septic pump out liquid	10000L
Oils	cooking oil, engine oil etc.	2500L
paint	Old paint	50L
chemicals	Various including agricultural	50L
Solid		
Compost	Residential & Business food waste, green waste	500m ³
Septic sludge	Biosolids (dewatered septic sludge)	2m ³
Glass	Glass from bottles, jars etc. and building waste	50m ³
Plastic	Household, packaging, bottles etc.	5m ³
Paper/cardboard	Household, packaging, newspapers	10m ³
Building waste	Rubble, timber, metal, etc.	10m ³
Whitegoods	Fridges, freezers, stoves, gas bottles etc.	20m ³
Asbestos	Asbestos fibre cement sheet	0m ³ (asbestos is not generally accepted at WMF)

Schedule C - Risk Assessment

The following risk assessment has been prepared following the NSW Office of Environment and Heritage Risk Management Guidelines.

Hazard to human health and environment	Risk	Consequence	Likelihood	Risk Rating	Control Measures	Residual Risk	PIRP Triggered
Chemical/oil spill	That chemicals or oil spill during unloading storage, loading and transport to ship	minor (immediate clean up implemented and no ongoing impact/residue)	Possible	Low	<ul style="list-style-type: none"> Unloading and loading occurs on a sealed hard stand area Stored on a bunded pallet Chemicals transported in appropriate containers that are fit for purpose Competent operators (with necessary licences) to load and unload transport vehicles 	Low	No
Effluent spill	Wastewater treatment system fails resulting in uncontrolled discharge	minor (immediate clean up implemented and no ongoing impact/residue)	unlikely	Low	<ul style="list-style-type: none"> Wastewater system maintained on regular basis in accordance with management plan. system condition audit to occur 4 times per year 	Low	No
Litter	Rubbish is blown from the site and pollutes adjacent areas	minor	Almost certain	Medium	<ul style="list-style-type: none"> Store waste in appropriate storage bays with adequate fences. Loose rubbish to be stored in appropriate Bins or baled and wrapped Undertake rubbish pick 2 times per year. 	medium	No

Hazard to human health and environment	Risk	Consequence	Likelihood	Risk Rating	Control Measures	Residual Risk	PIRP Triggered
Explosions of gas bottles or chemical containers	Explosions of gas bottles due to crushing of white goods which have not been degassed. Chemical containers explode due to exposure to heat or mixing with other chemicals	major	rare	medium	<ul style="list-style-type: none"> All fridges and freezers degassed prior to crushing and disposal off-island. WMF Coordinator to confirm. Chemicals to be stored in appropriate containers and clearly labelled. Chemicals not to be mixed Chemicals not to be stored in the sun. 	medium	Yes
Contamination of ground water/ lagoon	Liquid waste enters the ground water or lagoon.	moderate	possible	medium	<ul style="list-style-type: none"> Unloading of effluent to be undertaken on hardstand area. Liquid waste to be stored on appropriate bunded pallets or in appropriate storage containers Appropriately trained operators to handle waste. Compost to be stored on a hardstand 	medium	Yes
Noise	Noise of equipment causes noise pollution impacting on amenity of nearby areas	minor	unlikely	Low	<ul style="list-style-type: none"> WMF to operate in accordance with conditions of development consent 	low	No

Hazard to human health and environment	Risk	Consequence	Likelihood	Risk Rating	Control Measures	Residual Risk	PIRP Triggered
Odour	Odour from waste and operations of facility impact on amenity of nearby residents/businesses	minor	likely	medium	<ul style="list-style-type: none"> • Ensure WMF is as clean as possible – no putrescibles waste left uncontained • Composting systems operate correctly • Wood pile burnt under Permit issued under the Rural Fires Act • Burning of wood pile only to occur on days with favourable wind 	low	No
Fire	A fire burns facility and escapes into adjacent areas	major	unlikely	medium	<ul style="list-style-type: none"> • Wood pile burnt via Permit issued under the Rural Fires Act • Burning on wood pile only occurs in favourable weather conditions • Fire truck to attend all fires • WMF coordinator to check long range (4-day) weather forecast • LHIB to notify Police, RFS and adjacent leaseholder by email or phone • Staff attend fire whilst burning 	low	Yes

Schedule D – List of Safety Equipment at LHI WMF

The Following table identifies the safety equipment and other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident

Item/equipment	Details	Location
Communications		
Telephone	WMF site telephone	WMF Site Office
Handheld VHF radios	To be on person supervising fire at fire pit at WMF	Stored at LHIB depot to be collected prior to lighting a fire.
fax	If necessary Fax to be sent to notify police LHIB, RFS of fire in fire pit	WMF Site Office
email	to be sent to notify police LHIB, neighbours and RFS of fire in fire pit	WMF Site Office
Fire Equipment		
Hand extinguishers	To put out small fires	WMF
Fire Truck	To be on site when fire is planned at fire pit at WMF	Stored at LHIB depot to be collected prior to lighting a fire.
Pollution measures		
Bunded shed	To store liquid hazardous waste	WMF
Bunded pallets	To store paints, chemicals and oils	WMF
Spill Kit	To clean-up small on-site spills	WMF Liquid Waste Shed
Oil spill boom	To be deployed in lagoon in the case of a significant spill at jetty	Boatshed Building
Hardstand	Unloading and storage areas are on a sealed hardstand	WMF
Storage bays	Walled bays to store skips and baled waste prior to shipping off island	WMF
On-site Wastewater system	To capture and treat septic effluent. To capture and treat floor waste from HotRot feed assembly area	WMF
Safety Measures		
PPE	PPE includes eye protection, gloves, boots, hearing protection, breathing protection	WMF
Safety Inductions	All staff are inducted on the use of equipment and procedures guiding the operations of the WMF	Standard Operating Procedures and JSAs kept on site

Schedule E – Contact details in emergency incident

The Following table identifies the relevant contacts to be notified in the case of an emergency incident

Agency/Authority	Contact Name (if Known)	Contact details	When	Responsibility
Lord Howe Island Board				
Administration		6563 2066	Immediately all incidents	
Acting/Senior Manager Infrastructure & Engineering services	Brad Josephs	6563 2066 (a/h 6563 2439) Bradley.Josephs@lhib.nsw.gov.au	Immediately all incidents	Activate Incident Response Plan
Acting/Team Leader Asset Management	Uthia Makiiti	6563 2066 (a/h 6563 2481) uhtia.makitii@lhib.nsw.gov.au	Immediately all incidents	Activate Incident Response Plan
Chief Executive Officer	Suzie Christensen	6563 2066 (a/h 6563 2449) suzie.christensen@lhib.nsw.gov.au	In emergency	Managing the Response Plan
Team Leader Compliance & Projects	Kate Dignam	6563 2066 (a/h 6563 2221) kate.dignam@lhib.nsw.gov.au	In emergency	Local Emergency Management Officer (LEMO)
A/WMF Coordinator	Kezia Zaulich	6563 2309 (a/h 6563 2369) kezia.zaulich@lhib.nsw.gov.au		Activate Incident Response Plan. Initial Response at Facility
Environment Protection Authority (EPA)	Scott Ensbey	(02) 6640 2522 scott.ensbey@epa.nsw.gov.au	Immediately for a reportable	Regulator

Agency/Authority	Contact Name (if Known)	Contact details	When	Responsibility
			Pollution/environmental incident	
Police	Joel Merchant	000; 6563 2199 merc1joe@police.nsw.gov.au	Immediately in an emergency incident	LEOCON
SafeWork NSW		13 10 50	As soon as practicable after any relevant incidents	Regulator
LHI Hospital		000 or 6563 2000 reception@lordhowegp.com.au	000 if emergency	Patient Care
LHI Doctor	Dr San Clarke	65632000; (a/h) 6563 2056 crandymedical@gmail.com	000 if emergency	Patient Care
Rural Fire Service	Craig Wilson	000 or 6563 2392 craigwilsonlhi@gmail.com	Fire, explosion and spill incidents	RFS Captain
TfNSW - Roads and Maritime	Christopher Haselden	6563 2199 christopher.haselden@transport.nsw.gov.au	Marine Pollution incidents	Port Operations Manager
Marine Parks	Justin Gilligan	6563 2359 (a/h 6563 2387) justin.gilligan@dpie.nsw.gov.au	Marine Pollution Incidents	LHI Marine Park Manager

Schedule F – Map of Waste Management Facility

