



# Lord Howe Island Board Waste Management Facility

## Pollution Incident Response Management Plan

June 2024

V1.R10

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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	June 2024
	10	Update to contact details. Minor updates to flow charts, waste storage volumes, risk assessment and site map	June 2024	June 2025	

## 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
10/05/2023	Oil Spill – engine and machinery	Contact details updated x 4 personnel	June 2023
21/05/2024	Oil Spill - hydraulic	Contact details updated x 4 personnel	June 2024

## 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 Activities.

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 Management Plan

The LHIB WMF Pollution Incident Response Management Plan (PIRMP) has been prepared to meet the requirements set out in the Act. The PIRMP 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 PIRMP**

The PIRMP 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 PIRMP in accordance with the regulations. The PIRMP will be tested at least once every 12 months and within 1 month of any pollution incident occurring during 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 PIRMP**

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

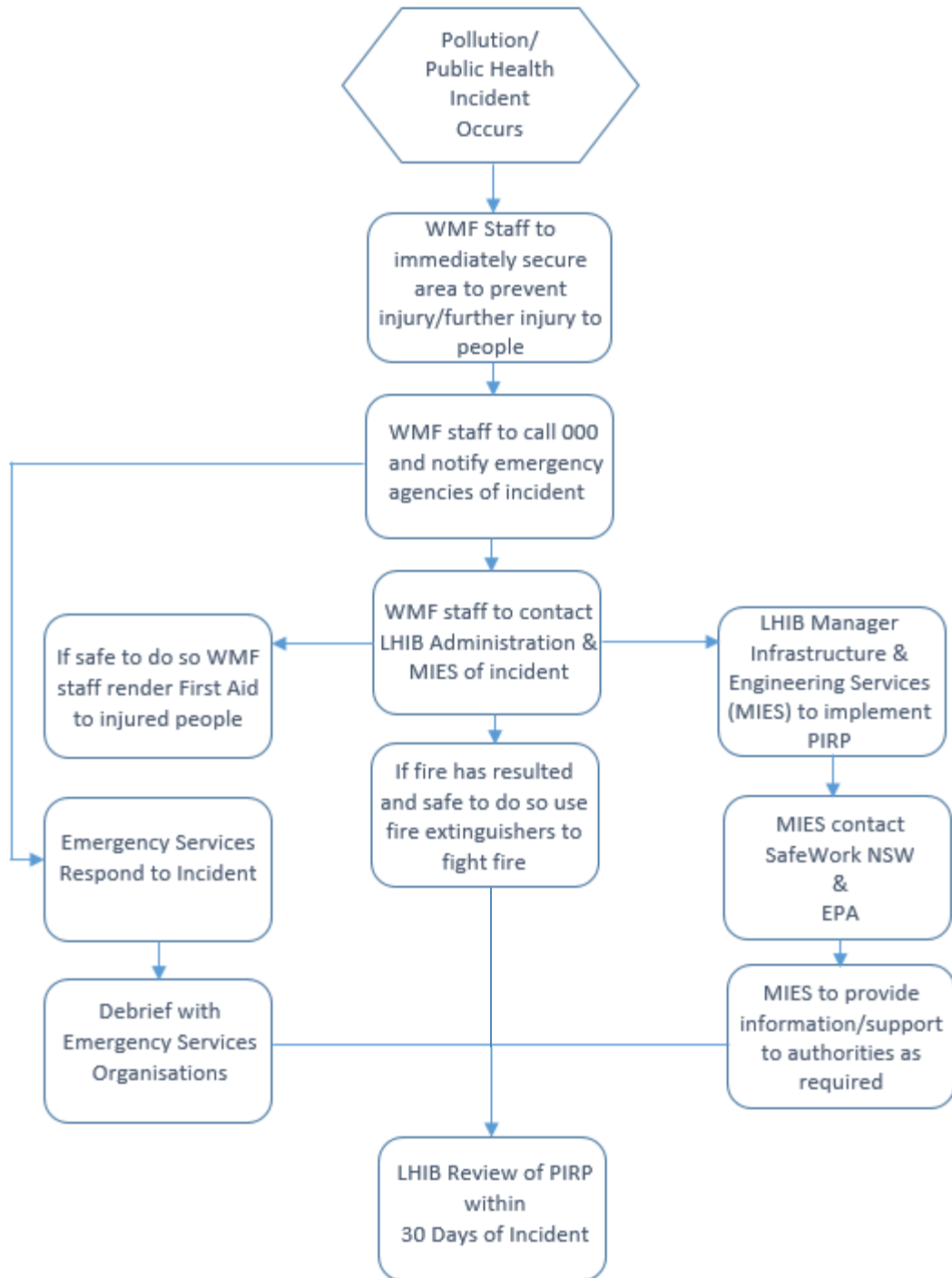
The LHI Waste Management Facility does not generally manage materials that are likely to cause a significant environmental or public health risk. However, there is the possibility that high risk materials may arrive at the facility or that an incident may occur as a result of the operations of the WMF.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

### Incident

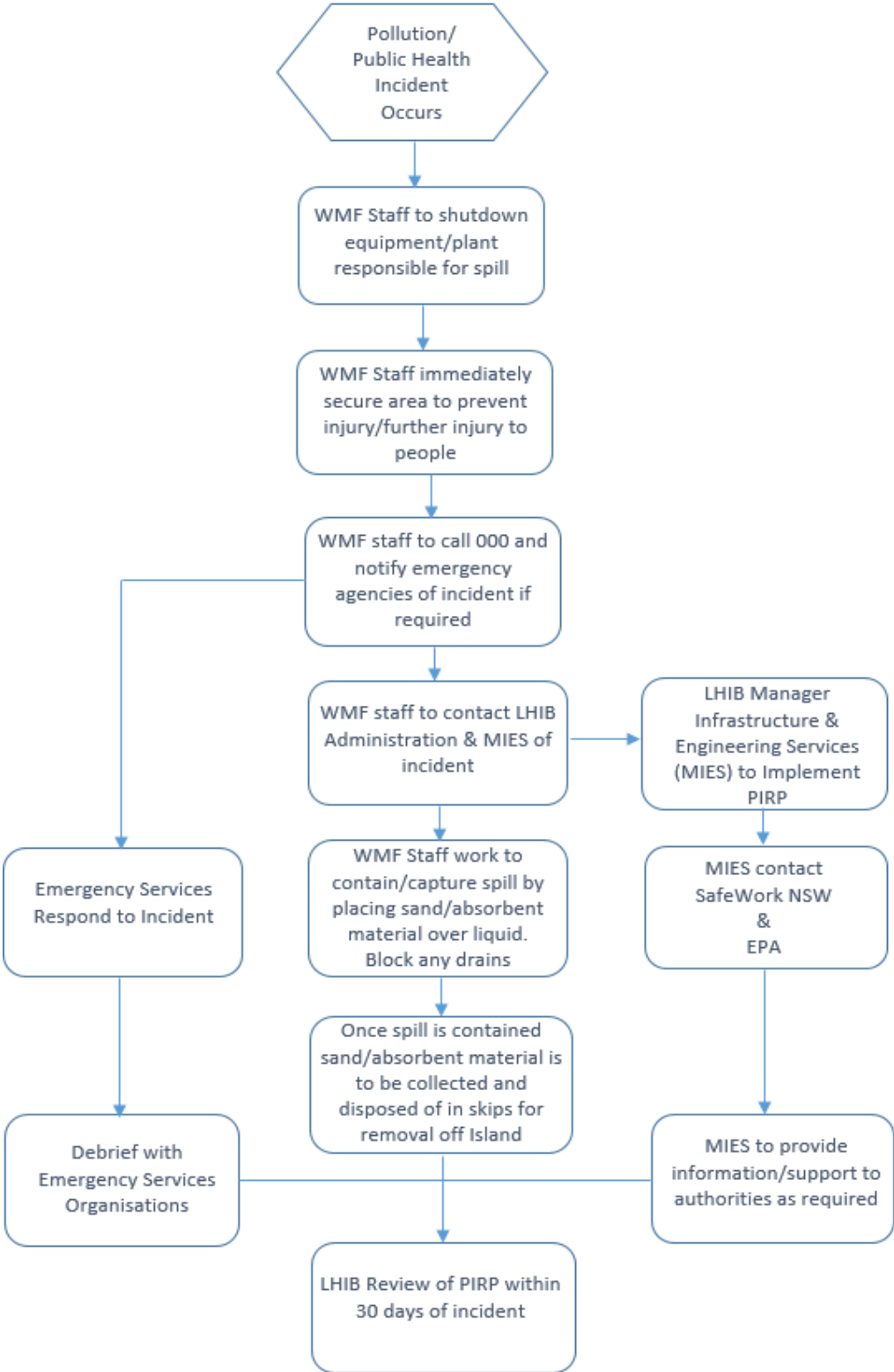
Response details have been developed to cover the following incidents:

- 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

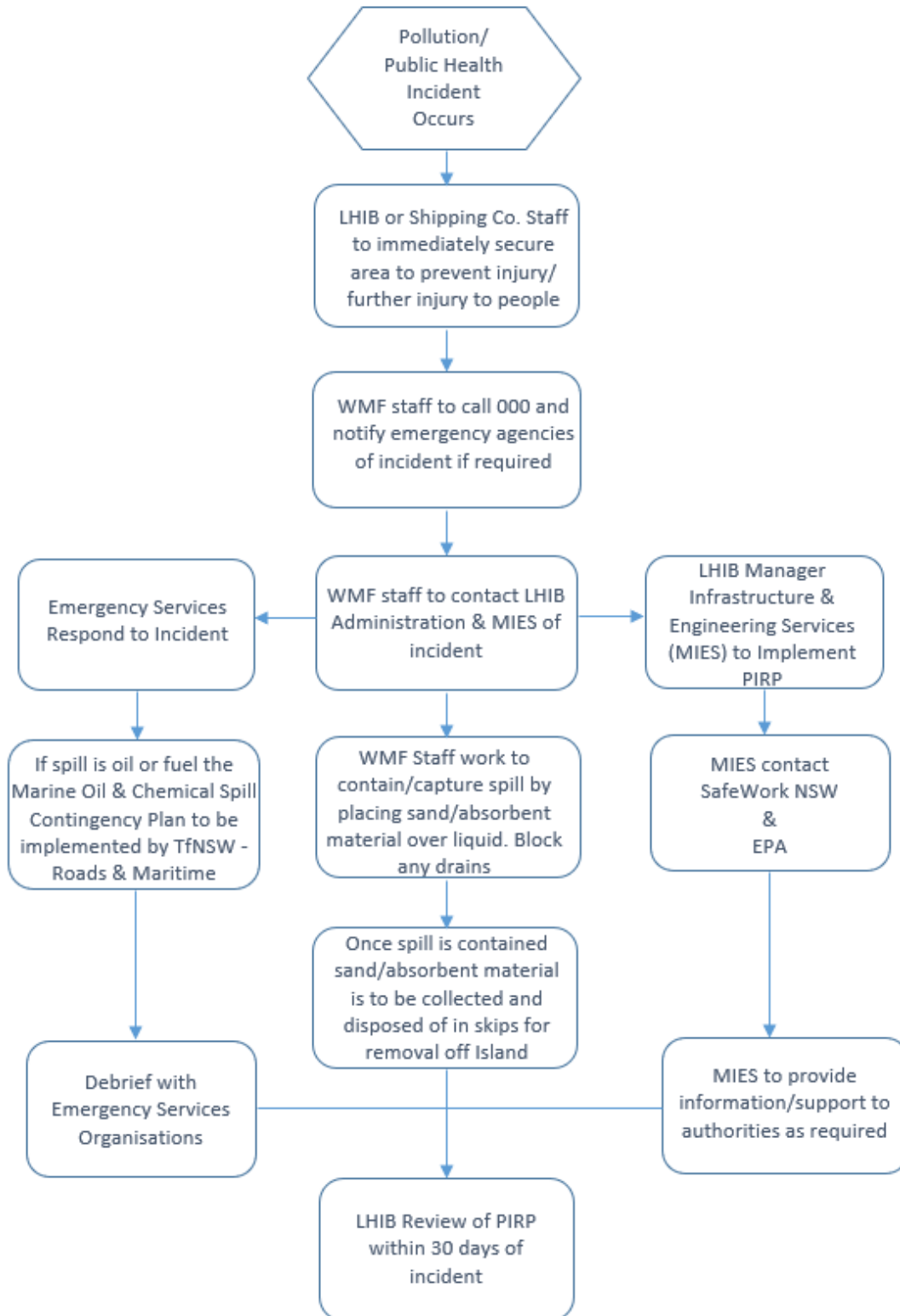


Incident - Contamination of groundwater/lagoon by liquids within the WMF

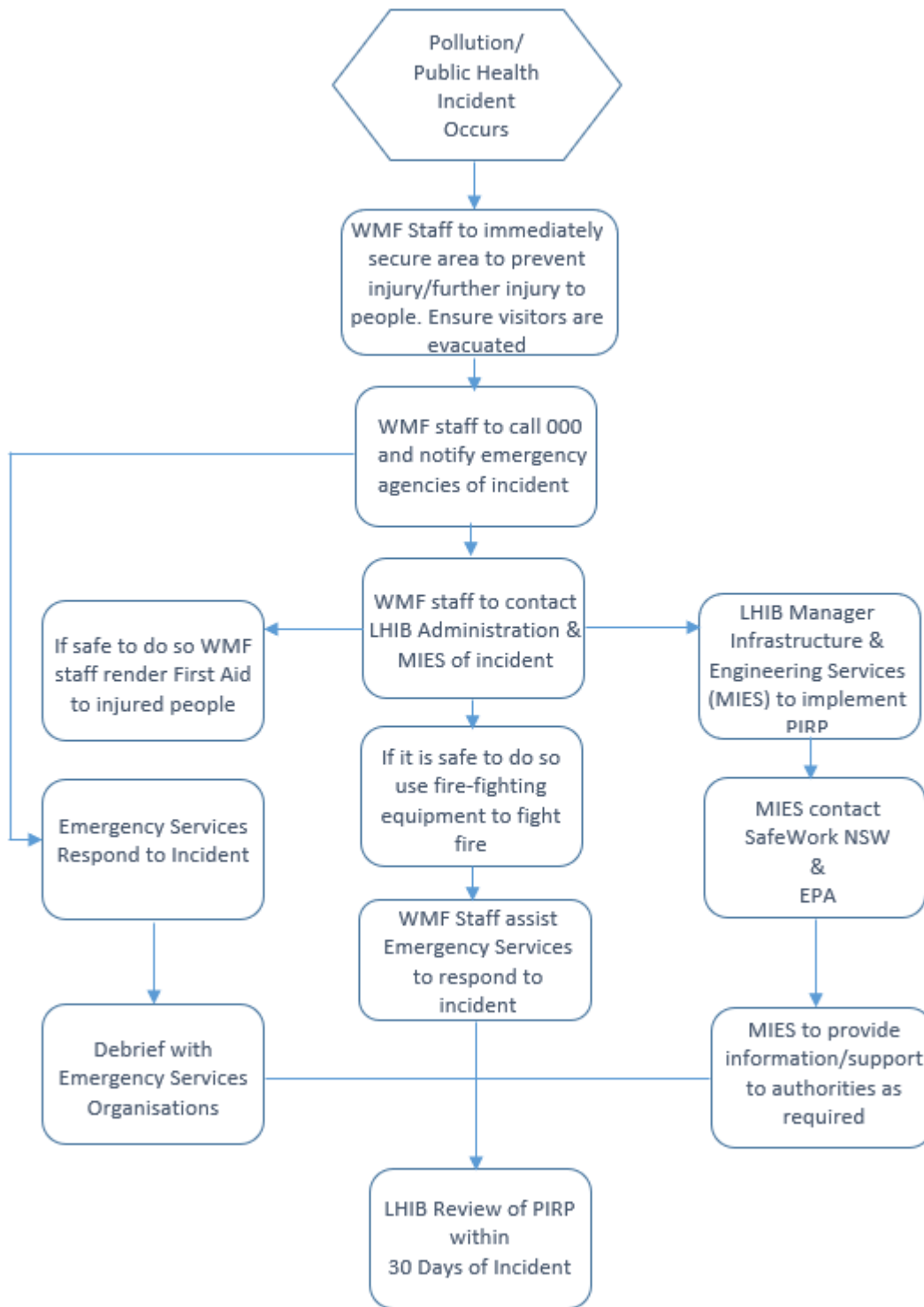




Incident – Contamination of groundwater/lagoon by liquids during transport to ship



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	1500L
Chemicals	Various including agricultural	150L
Solid		
Compost	Residential & Business food waste, green waste	500m <sup>3</sup>
Septic sludge	Biosolids (dewatered septic sludge)	2m <sup>3</sup>
Glass	Glass from bottles, jars etc. and building waste	150m <sup>3</sup>
Plastic	Household, packaging, bottles etc.	15m <sup>3</sup>
Paper/cardboard	Household, packaging, newspapers	10m <sup>3</sup>
Building waste	Rubble, timber, metal, etc.	110m <sup>3</sup>
Whitegoods	Fridges, freezers, stoves, gas bottles etc.	20m <sup>3</sup>
Asbestos	Asbestos fibre cement sheet	0m <sup>3</sup> (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	Possible	Low	<ul style="list-style-type: none"> <li>Unloading and loading occurs on a sealed hard stand area</li> <li>Stored on a bunded pallet</li> <li>Chemicals transported in appropriate containers that are fit for purpose</li> <li>Competent operators (with necessary licences) to load and unload transport vehicles</li> </ul>	Low	No
Effluent spill	Wastewater treatment system fails resulting in uncontrolled discharge	minor	unlikely	Low	<ul style="list-style-type: none"> <li>Wastewater system maintained on regular basis in accordance with management plan.</li> <li>system condition audit to occur 4 times per year</li> </ul>	Low	No
Litter	Rubbish is blown from the site and pollutes adjacent areas	minor	Almost certain	Medium	<ul style="list-style-type: none"> <li>Store waste in appropriate storage bays with adequate fences.</li> <li>Loose rubbish to be stored in appropriate bins or baled and wrapped</li> <li>Undertake rubbish pick 2 times per year.</li> </ul>	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"> <li>Whitegoods and gas bottles packaged whole for disposal i.e. not crushed.</li> <li>All fridges and freezers degassed prior disposal off-island.</li> <li>Chemicals to be stored in appropriate containers and clearly labelled.</li> <li>Chemicals stored in bunded shed.</li> <li>Chemicals not to be mixed</li> </ul>	medium	Yes
Contamination of ground water/ lagoon	Liquid waste enters the ground water or lagoon.	moderate	possible	medium	<ul style="list-style-type: none"> <li>Unloading of effluent to be undertaken on hardstand area.</li> <li>Liquid waste to be stored on appropriate bunded pallets and/or storage containers.</li> <li>Appropriately trained operators to handle waste.</li> <li>Compost to be stored on a hardstand</li> </ul>	medium	Yes
Noise	Noise of equipment causes noise pollution impacting on amenity of nearby areas	minor	unlikely	Low	<ul style="list-style-type: none"> <li>WMF to operate in accordance with conditions of development consent</li> </ul>	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"> <li>• Ensure WMF is as clean as possible – no putrescible waste left uncontained</li> <li>• Composting systems operate correctly</li> <li>• Hot Rot Biofilter maintained regularly</li> <li>• Wood pile burnt under Permit issued under the Rural Fires Act</li> <li>• Burning of wood pile only to occur on days with favourable wind</li> </ul>	low	No

## 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
<b>Communications</b>		
Telephone	WMF site telephone	WMF Site Office
Handheld VHF radios	To be on person supervising the pile burn at WMF	WMF Site Office. Additional stored at LHIB depot to be collected prior to lighting a fire
Email	to be sent to notify police LHIB, neighbours and RFS of fire in fire pit	WMF Site Office
<b>Fire Equipment</b>		
Hand extinguishers	To put out small fires	WMF
Fire Truck	To be on site when fire is planned for the burn pile at WMF	Stored at LHIB depot to be collected prior to lighting a fire.
<b>Pollution measures</b>		
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	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 and waste soring shed	WMF
<b>Safety Measures</b>		
PPE	PPE includes eye and face protection, gloves, boots, hearing protection (muffs & plugs), breathing protection (GP1 & P2 face masks)	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
<b>Lord Howe Island Board</b>				
Administration		6563 2066	Immediately all incidents	
Acting/Senior Manager Infrastructure & Engineering Services	Brad Josephs	6563 2066 (a/h 6699 1431) <a href="mailto:bradley.josephs@lhib.nsw.gov.au">bradley.josephs@lhib.nsw.gov.au</a>	Immediately all incidents	Activate Incident Response Plan
Team Leader Compliance & Reporting	Kate Dignam	6563 2066 (a/h 6563 2221) <a href="mailto:kate.dignam@lhib.nsw.gov.au">kate.dignam@lhib.nsw.gov.au</a>	Immediately all incidents	Activate Incident Response Plan + Local Emergency Management Officer (LEMO)
Chief Executive Officer	Suzie Christensen	6563 2066 (a/h 6563 2449) <a href="mailto:suzie.christensen@lhib.nsw.gov.au">suzie.christensen@lhib.nsw.gov.au</a>	In emergency	Managing the Response Plan
A/WMF Coordinator	Kezia Zaulich	6563 2309 (a/h 6699 1431) <a href="mailto:kezia.zaulich@lhib.nsw.gov.au">kezia.zaulich@lhib.nsw.gov.au</a>		Activate Incident Response Plan, Initial Response at Facility
<b>Environment Protection Authority (EPA)</b>	Scott Ensbey	(02) 6640 2522 <a href="mailto:scott.ensbey@epa.nsw.gov.au">scott.ensbey@epa.nsw.gov.au</a>	Immediately for a reportable pollution / environmental incident	Regulator



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

# Schedule F – Map of Waste Management Facility

