# Bungendore Resource Recovery Facility – Pollution Incident Response Management Plan

## Revision History

| Revision | Revision Comments | Author | Approver | Approval Date |
|---|---|---|---|---|
| 0 | Original | Brendan Belcher | Gordon Cunningham | 14/08/2019 |
| 1 | See update table | Brendan Belcher | Gordon Cunningham | 07/02/2022 |
| 2 | See update table | Brendan Belcher | Gordon Cunningham | 09/10/2023 |
| 3 | No amendment – uprev to match ECM version control | | | |
| 4 | No amendment – uprev to match ECM version control | | | |
| 5 | No amendment – uprev to match ECM version control | | | |
| 6 | See update table | Brendan Belcher | Gordon Cunningham | 09/10/2024 |
| 7 | Update with the new waste team details | Josh Hrynko | Toby Browne | 10/09/2025 |

## Purpose

**Ref:** Doc Set ID 354982

Queanbeyan-Palerang Regional Council (QPRC) holds an Environment Protection Licence with the NSW Environment Protection Authority for the Bungendore Resource Recovery Facility. As per the *Protection of the Environment Operations Act (1997)* (the "POEO Act"), the holder of an environment protection licence must prepare, keep, test and implement a pollution incident response management plan that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

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 POEO Act) is caused or threatened, the person carrying on the activity must **immediately** implement this plan in relation to the activitiy required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at the Bungendore Resource Recovery Facility, or where the activity takes place in the case of mobiles plant licences, and be made available on request by an authorised NSW Environment Protection Officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publically available website, or if there is no such website, by providing a copy of the plan to any person who make a written request. The section of the plan which are required to be publically available are set out in clause 98D of the *Protection of the Environment Operations (General) Regulation 2009.*

Note: This plan must be developed in accordance with:

- NSW EPA's *Environmental Guidelines: Pollution Incident Response Management Plans;* and
- The *Protection of the Environment Operations Act 1997;* and
- The *Protection of the Environment Operations (General) Regulation 2009*

| Environment Protection Licence Details | | Pollution Incident – Person(s) responsible | |
|---|---|---|---|
| **Name of Licensee** | Queanbeyan-Palerang Regional Council | **Plan Activation** | Primary<br>Site staff |
| **EPL Number** | 21023 | **Notifying Relevant Authorities** | [redacted] |
| **Premises name and address** | Bungendore Resource Recovery Facility<br>210 Tarago Road Bungendore NSW 2621 | **Managing Response to Pollution Incident** | [redacted] |
| **Company contact details** | Toby Browne<br>[redacted] | | |
| **Scheduled Activity** | Composting<br>Waste Storage | | |
| **Fee based activity** | Composting<br>Waste storage – other types of waste<br>Waste storage – waste tyres | | |

| Incident Notification | | |
|---|---|---|
| Notification of relevant authorities<br>The following must be notified of any incident that causes or threatens to cause material harm to the environment.<br><br>**If notification is made, notification must be made to ALL listed authorities.** | Emergency Services | 000 |
| | EPA Environment Line | 131 555 |
| | NSW Health | 02 9391 9000 |
| | Safework NSW | 131 050 |
| | Council WHS/HSEQ Officer | Megan Arnold [redacted] |
| | Council Manager Environment and Compliance | Melinda Corey [redacted] |
| Local Authority | Queanbeyan-Palerang Regional Council | 1300 735 025 |
| Local community and neighbours notification and communication procedures | Immediate Neighbours<br>217 Tarago Road, Bungendore NSW 2621<br><br>Door knock of other impacted properties. Follow up correspondence<br><br>General Community Alert<br>Council Facebook Notification via Council Communications Team | [redacted] |

| Description and Likelihood of Hazards |
|---|
| Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates |
| See attached risk assessment |
| Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood |
| See attached risk assessment |

| Pre-emptive actions to be taken |
|---|
| Provide detailed descriptions of the actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises |
| • No smoking on site<br>• Screening of incoming loads<br>• Appropriate separation and storage of materials<br>• Pro-active management of waste volumes to minimise risk of environmental incident<br>• All leachate diverted to leachate ponds |

| Inventory of Pollutants | | | |
|---|---|---|---|
| Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates<br>Identify the maximum quantity of any pollutant/s that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates | | | |
| Pollutant | Max Quantity | Location | Comments |
| Waste oil | 8000L | Eastern hardstand | Large metal bund for oil collection delivered by residents |
| Tyres | Approximately 500 at any time | Eastern hardstand | |
| Residual Waste | Approximately 100t at any time | Waste push-pit | |
| Paints – Water based<br>Paints – Oil based<br>Non-motor Oil | 9000kg | CRC Building | CRC |
| Household Batteries | 150kg | CRC Building | CRC |
| Aerosols | 250L | CRC Building | CRC |
| Corrosive Acid | 250L | CRC Building | CRC |
| Corrosive Alkaline | 250L | CRC Building | CRC |
| Flammable Liquid | 250L | CRC Building | CRC |
| Oxidising Agent | 250L | CRC Building | CRC |
| Toxic Materials | 250L | CRC Building | CRC |

**Safety Equipment**

Describe the safety equipment or other devices that are used to minimise the risk to human health or the environment and to contain or control a pollution incident

The following safety equipment is located on site:

- 2 x spill kits – CRC Shed
- 2 x fire hose reels – Waste Pushpit
- 8 x fire extinguishers – Various locations
- 2 x safety showers – CRC Shed/Waste Pushpit
- 2 x first aid kits – Lunchroom/Buyback Shed
- 6 x barrier boards – Machinery Shed

| Communicating with neighbours and the local community |
|---|
| Identify details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on |
| • In the event of emergency requiring notification to adjoining owners, the Coordinator – Waste Operations will make contact via phone or door-knocking |
| Develop any specific information that could be provided to the community so it can minimise the risk harm |
| • Given the low number of affected properties, no information is considered necessary<br>• In higher risk events (e.g. waste/tyre fire), emergency services will be in control of public messages and Council will publish their messages |

| Minimising harm to persons on the premises |
|---|
| Identify 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 |
| • See attached risk assessment |
| Develop any specific information that could be provided to the community so it can minimise the risk harm |
| • Given the low number of affected properties, no information is considered necessary<br>• In higher risk events (e.g. waste/tyre fire), emergency services will be in control of public messages and Council will publish their messages |

| Maps |
|---|
| Provide a detailed map showing<br>• Location of the premises<br>• Surrounding area that is likely to be affected by a pollution incident<br>• Location of potential pollutants on the premises<br>• Location of any stormwater drains on the premises<br>It is also recommended that the position of any discharge points or any other useful information be included on the maps, and that any important details on the map are labelled |
| See attachment |

| Actions to be taken during or immediately after a pollution incident | |
|---|---|
| Pollution control action | In the event of pollution incident, the following will occur:<br>• Site staff identify the incident and enact this PIRMP<br>• Site staff make area safe and evacuate area as necessary<br>• Site staff make contact with Coordinator or Manager<br>• Coordinator/ Manager determine if incident needs to be notified to relevant authorities<br>• Coordinator/ Manager notify adjoining properties as necessary<br>• Coordinator/ Manager notify communications section as necessary<br>• Site staff and Coordinator undertake corrective actions as necessary<br><br>See also “PIRMP on a Page” (attached) |
| Coordinating persons | Primary<br>Joshua Hrynko<br>Coordinator – Waste Operations<br>[redacted]<br>Secondary<br>Toby Browne<br>Manager Waste<br>[redacted] |

| Staff Training |
|---|
| Identify the nature and objectives of the any staff training program in relation to this plan |
| • Asbestos Awareness<br>• Silica Exposure Prevention<br>• Corporate HSEQ<br>• First Aid<br>• Forklift ticket<br>• CRC Management (including spill response)<br>• Landfill and Transfer Station Operator Workshop |

**Testing and Updating the PIRMP**

It is a legal requirement to test the plan every 12 months and within 1 month of any pollution incident:

- Detail the manner in which the plan is to be tested and maintained to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner
- Detail how the testing is documented and recorded (this must include the testing dates and the names of all staff members who carried out the testing)
- Detail the dates on which the plan is updated

**PIRMP Testing Details**

| Date Tested | Tested By (to include the names of all people involved in testing) | Details of Test (e.g. nature of the test, involvement of other agencies) Note: testing must cover all components of the plan. | Finding of test including issues identified | Next scheduled testing date (must be within 12 months from the current test) |
|---|---|---|---|---|
| 16 March 2020 | Brendan Belcher<br>Shane O'Shea<br>Andrew McLeod | See ECM Reference 625351 | See ECM Reference 625351 | |
| 7 February 2022 | Brendan Belcher<br>Shane O'Shea<br>Gordon Raynes<br>Chris McMullan | See ECM Reference 1536961 | See ECM Reference 1536961 | Before 7 February 2023 |
| 27 September 2023 | See ECM Reference 2807637 | See ECM Reference 2807637 | See ECM Reference 2807637 | Before 27 September 2024 |
| 13 June 2025 | Josh Hrynko<br>Graeme Gillie<br>Gordon & Zac Raynes<br>Carlo Keenan<br>Caitlin Oosting<br>William Bremner | See ECM Reference 3304888 | See ECM Reference 3304888 | Before 13 June 2026 |

**PIRMP Update Details**

| Date Occurred | Reason for update | Details of Update | Date the updated version uploaded to website (if applicable) | Date of completion |
|---|---|---|---|---|
| 7 February 2022 | PIRMP test details added | PIRMP test details added | 8 February 2022 | 7 February 2022 |
| 9 October 2023 | General PIRMP review | General update of contacts | 10 October 2023 | 9 October 2023 |

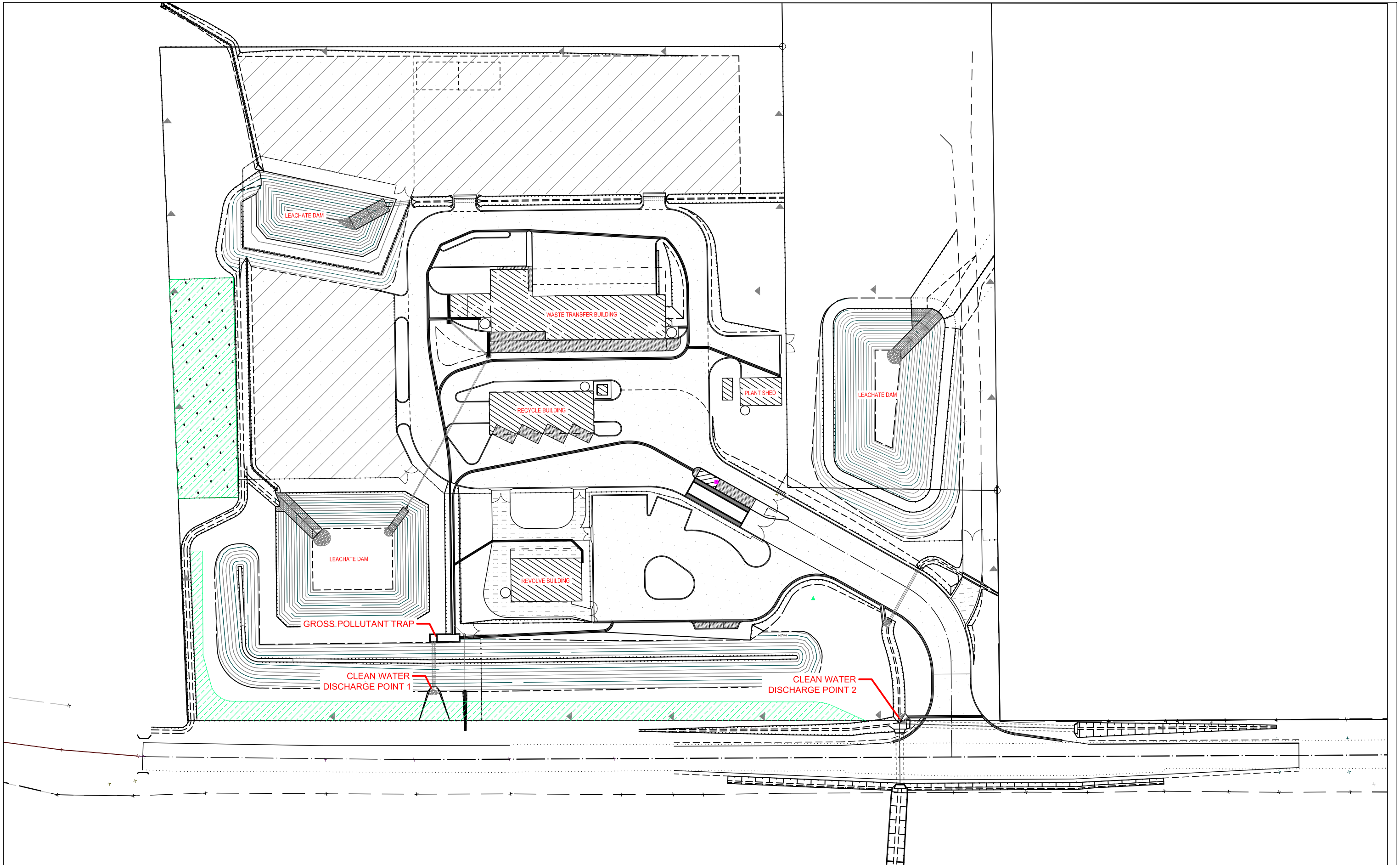
| | | | | |
|---|---|---|---|---|
| 9 October 2024 | General PIRMP review | General update of contacts and PIRMP test details added | 10 October 2024 | 9 October 2024 |
| 14 July 2025 | General PRIMP Review | General update of contacts and PIRMP test details added | 17 September 2025 | 17 September 2025 |

## Attachments

Attachment 1 - Risk assessment
Attachment 2 – Site Map
Attachment 3 – PIRMP on a Page

**Risk register** C17198187
**Business unit/activity/project name:**
**Prepared by:** Joshua Hrynko
**Date:** Jun-25
**Approved by:** Toby Browne
**Date:** Jun-25
**Next reviewed scheduled for:** Jun-26

| IDENTIFY | | | | ASSESS | | | CONTROL | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Inherent risk assessment | | | Preventative actions | | | | Detection and response actions | | | | Residual risk assessment | | |
| Risk ID/number | Description | Sources of environmental impacts/ aspects | Impacts on Council | Likelihood | Consequences | Rating | Controls acting on sources of risk | Type | Effectiveness | Responsible | Controls acting on consequences | Type | Effectiveness | Responsible | Likelihood | Consequence | Rating |
| E1 | Asbestos containing material (ACM) is dumped on site | a) Exposure of worker and general public to ACM<br>b) Release of ACM to environment | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Almost certain | Medium | High | a) Inspection of incoming waste<br>b) Reject loads with suspect material unless clearance certificate provide | Process/system | Mostly effective | Site staff | i) Implement asbestos management plan if suspected ACM found | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E2 | Chemical spill | a) Release of chemicals to the environment<br>b) Exposure of workers and general public to chemicals<br>c) Interaction of chemicals results in fire/explosion or other hazardous event | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Likely | Medium | High | a) Store chemicals in well ventilated undercover area<br>b) Utilise double bunded storage receptacles<br>c) Practice safe handling and storage | Process/system | Very effective | Site staff | i) Implement spill clean-up procedure | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E3 | Waste fire | a) Release of toxic chemicals to environment<br>b) Exposure of public to toxic chemicals<br>c) Fire spreads beyond site boundaries | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Possible | Very high | High | a) Manage waste volumes<br>b) No smoking on site<br>c) Divert hot loads to alternative area | Process/system | Very effective | Site staff | i) Call 000<br>ii) Close site<br>iii) Implement PIRMP | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E4 | Tyre fire | a) Release of toxic chemicals to environment<br>b) Exposure of public to toxic chemicals<br>c) Fire spreads beyond site boundaries | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Possible | Very high | High | a) Manage waste volumes and store correctly<br>b) No smoking on site | Process/system | Very effective | Site staff | i) Call 000<br>ii) Close site<br>iii) Implement PIRMP | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E5 | Build up of waste above licence limits | a) Excessive stockpiled material risks environmental damage<br>b) Excessive stockpiled material leads to licence breach | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Likely | Medium | High | a) Regularly review stockpile quantities<br>b) Have regular collections of materials | Process/system | Very effective | Site staff | i) Arrange collection at earliest opportunity | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E6 | Bushfire | a) Release of toxic chemicals to environment<br>b) Exposure of public to toxic chemicals<br>c) Fire melts receptacles and chemicals are released | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Possible | Medium | Medium | a) Manage site volumes<br>b) Use fire-resistant materials<br>c) Store flammable materials away from potential fire paths<br>d) Have on-site fire management systems | Process/system | Reasonably effective | Site staff | i) Close site<br>ii) Call 000<br>iii) Implement Emergency Management Plan | Process/system | Very effective | Site staff | Unlikely | Low | 0 |
| E7 | Water contamination | a) Release of toxic chemicals to environment<br>b) Exposure of public to toxic chemicals<br>c) Fire spreads beyond site boundaries | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Unlikely | Medium | Medium | a) Manage site dam volumes<br>b) Avoid unnecessary site washdown<br>c) Maintain erosion and sediment controls | Process/system | Very effective | Site staff | i) Implement spill clean-up procedure | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E8 | Vehicular accident on site | a) Release of toxic chemicals to environment<br>b) Exposure of public to toxic chemicals<br>c) Fire spreads beyond site boundaries | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Possible | Very high | High | a) Manage waste volumes and store correctly<br>b) No smoking on site | Process/system | Very effective | Site staff | i) Call 000<br>ii) Close site<br>iii) Implement PIRMP | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E9 | Waste Explosion | a) Release of toxic chemicals to environment<br>b) Exposure of public to toxic chemicals<br>c) Fire spreads beyond site boundaries | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Possible | Very high | High | a) Manage waste volumes and store correctly<br>b) No smoking on site | Process/system | Very effective | Site staff | i) Call 000<br>ii) Close site<br>iii) Implement PIRMP | Process/system | Very effective | Site staff | Unlikely | Very low | 0 |
| E10 | Wind-blown litter | a) Release of litter to the environment | i) Site is shut down<br>ii) Licence breach<br>iii) Additional cost<br>iv) Reputational damage | Almost certain | High | Extreme | a) Manage site wastes to minimise litter | Process/system | Reasonably effective | Site staff | a) Litter pick as necessary<br>b) Engage contractors to assist when necessary | Process/system | Mostly effective | Site staff | Likely | Low | 0 |




SCALE: (A1 ORIGIN)
1 : 1000 @ A3

DATUM: LOCAL
ORIGIN:
COORD. SYSTEM: M.G.A.

| | | | |
|---|---|---|---|
| SURVEYED | KB | DATE | 03/07 |
| DESIGNED | PJM | DATE | 06/12 |
| DRAWN | PJM | DATE | 11/12 |
| CHECKED | PJM | DATE | 12/12 |

| No | AMENDMENT | BY | DATE |
|---|---|---|---|

PALERANG COUNCIL
PALERANG COUNCIL
10 MAJARA STREET
BUNGENDORE, NSW, 2621
TEL:6238 8111 FAX:6238 1290

PROJECT:
BUNGENDORE
WASTE TRANSFER STATION

CIVILCAD FILE No.:
CADR DRAWING No.: BUNGENDORE_DRAINAGE_PLAN.dwg
JOB No.:
SHEET:
REV.

TITLE:
DRAINAGE PLAN

# BUNGENDORE RRF POLLUTION AND INCIDENT RESPONSE FORM

**Pollution Incident Occurs**

- Stop all work in relevant area
- **Make site safe**
- Implement initial controls to reduce impacts

**Call Emergency Services**

- Assess if emergency services are required
- **If required, call immediately and control site in a safe manner to best of abilities**

**Notify Program Coordinator**

- Coordinator – Waste Operations - Josh Hrynko - [redacted]

**Determine Category**

- Answer following questions. If any are "YES", classify as Category 1 incident. If all "NO", classify as Category 2 incident.
  - Are there any pollutants that causes or threatens material harm to the environment involved? YES/NO
  - Has any pollutant or incident impacted a threatened species or endangered ecological community? YES/NO
  - Has any pollutant or incident impacted an Aboriginal or non-Aboriginal heritage item, site or relic? YES/NO

**Notify Service Manager**

- Category 1 - Immediately notify Manager Waste - Toby Browne [redacted]
- **Category 1 - If unable to notify Manager, notify authorities as appropriate (see next step)**
- Category 2 - Within 24 hours notify Manager Waste - Toby Browne [redacted]

**Category 1 - Notify Authorities**

- Emergency Services - 000
- EPA Environment Line - 131 555
- NSW Health - 02 9391 9000
- Safework NSW - 131 050
- Council WHS/HSEQ - Megan Arnold - [redacted]
- Manager Environment and Compliance - Mel Corey - [redacted]

**Record Incident**

- For all incidents, complete incident report and submit to relevant Program Coordinator within 24 hours of incident

**Finalise Incident**

- Review incident report and complete root cause analysis
- Finalise incident report within 48 hours of incident
- Submit incident report to Service Manager within 48 hours

**EPA report**

- Review incident report
- Distribute copies to Director - Infrastructure Services and Manager Natural Landscapes and Health
- Submit to EPA within 7 days of incident occuring

Blue – Site staff  Green – Coordinator  Red – Manager

Last Revision – 12 June 2025