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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

TULLIMBA FEEDLOT

“Tullimba”, 1831 Torryburn Road, Torryburn, NSW 2358

Prepared for: University of New England

November 2022

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DOCUMENT CONTROL

Project Name	Pollution Incident Response Management Plan
Proponent	University of New England
Project Reference	21-236
Report Number	21-236 - Pollution Incident Response Management Plan
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Revision History			
Version Number	Date	Authority	Details
0	November 2021	Marie Duffy (SMK Consultants)	Draft - Initial Issue
1	November 2022	Marie Duffy (SMK Consultants)	Updated following issue of EPL

TABLE OF CONTENTS

Emergency Contact Numbers	vi
1 Introduction	7
1.1 Scope	7
1.2 Legislative Requirements	7
1.3 Definition of a “Pollution Incident”	8
1.4 Responsibilities	9
1.4.1 Plan Implementation	9
1.4.2 Publication of Pollution Monitoring Data	9
1.5 Plan Availability	10
1.6 Site Location	11
2 Site Activities	15
2.1 Waste storage	15
2.1.1 Manure Treatment and Storage	15
2.1.2 Effluent Treatment and Storage	15
2.2 Chemical Storage	15
3 Hazard Identification and Management	16
3.1 Hazard Identification	16
3.2 Potential Pollutants	16
3.3 Distance to Sensitive Receptors	17
3.4 Hazard Risk Analysis	17
3.5 Pre-emptive Risk Reduction Actions	19
3.5.1 Effluent Drainage and Storage System	19
3.5.2 Chemical Use and Storage	19
3.5.3 Excessive Dust	19
3.5.4 Mass Stock Death Event	20
3.5.5 Fire	20
3.5.6 Inspections	20
3.5.7 Communications	20
3.6 Residual Environmental Risk	20
4 Pollution Incident Action Plan	22
4.1 Emergency Response Procedure	22
4.2 Procedure for Notifying Relevant Authorities	22
4.3 Spills	23
4.4 Excessive Dust	23

4.5	Mass Stock Death Event.....	23
4.6	Communication Mechanisms	24
4.7	Incident Reporting	24
4.8	Incident Records	24
4.9	First Aid and Safety	24
5	PIRMP Testing and Review	26
5.1	Staff Training.....	26
5.2	Non-conformance and Corrective Actions	26
6	References	27
	Appendix A: PIRMP Testing Records.....	28
	Appendix B: Neighbours Contact List	30
	Appendix C: Site Plan	32
	Appendix D: Emergency Animal Disease (EAD) Action Plan	34
	Appendix E: Environmental Protection Licence.....	36

Emergency Contact Numbers

In the event of an Emergency call:

Police, Fire, Ambulance on '000'

Other Numbers of Importance

Authority Contact	24 Hour Phone
Police, Fire, Ambulance	000
Uralla Shire Council	02 6778 3000
EPA	131 555
Minister of Health	02 6764 8000
WorkCover	131 050

Contact	Phone Number
Armidale Medical Centre	02 6722 2233
Fire Brigade	000
Armidale Hospital	02 6776 9500
Inverell Police Station	02 6771 0699
State Emergency Service	132 500
SMK Consultants	02 6752 1021
SMK Consultants AH (Peter Taylor)	0429 048 599

Contacts - Tullimba Feedlot	Phone Number
Colin Crampton	0477 320 816

1 Introduction

“Tullimba Feedlot” operates under Environment Protection Licence 21723, issued under the provisions of the *Protection of the Environment Operations Act 1997*, which allows for the accommodation of cattle up to a total of 2,000 head.

Conditions in the licence requires the testing and recording of listed pollutants in the soils in the effluent and manure utilisation area, as well as in surface waters upstream and downstream of the feedlot. The licence also provides that rainfall must be monitored and recorded as millimetres per 24 hours.

This Pollution Incident Response Management Plan (PIRMP) has been prepared for the 2,000 head cattle Feedlot facility at “Tullimba”, 1831 Torryburn Road, Torryburn. The preparation of a Pollution Incident Response Management Plan is required in accordance with Section 153A of the *Protection of the Environment Operations Act 1997*. Following changes introduced by the *Protection of the Environment Legislation Amendment Act 2011* the licensee or employees of the licensee must develop and maintain a Pollution Incident Response Management Plan, which ensures notification to the relevant authorities of any incidents causing or threatening material harm to the environment as soon as is practicable after the licensee or employee becomes aware of the incident.

1.1 Scope

The plan establishes a framework for the effective handling of emergencies and management of the return to normality through:

- avoiding loss of life
- minimising damage to property
- minimising damage to surrounding environment
- supporting a prompt response to any unintended effluent discharge
- directing key people to act on specific tasks and provide direction
- provide response mechanisms that support business continuity during & after an emergency.

1.2 Legislative Requirements

This Pollution Incident Response Management Plan (PIRMP) has been prepared for Tullimba Feedlot to meet the requirements of the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). Under the POELA Act all current NSW Environment Protection Licence (EPL) holders are required to implement a PIRMP. The PIRMP is in a written form and kept on-hand at the licenced premises.

Furthermore, the PIRMP is reviewed at least on an annual basis or within one month of any pollution incident occurring.

The POEO Act requires the Plan to include the following components:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act);
- Information detailed in part 5.7A of the POEO Act (section 153C) and be in the form described in clause 988 of the *Protection of the Environment Operations (General) Regulation 2009* (POEO (G) Regulation);
- Licensees must keep the Plan at the premises to which the EPL relates or, in the case of trackable waste transporters and mobile plant, where the relevant activities take place (section 1530, POEO Act);
- Licensees must test the Plan in accordance with clause 98E of the POEO (G) Regulation; and
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

1.3 Definition of a "Pollution Incident"

EPA (2012) defines a pollution incident as stated below:

"Pollution incident means 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 circumstances involving only the emission of any noise."

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 as:

- Harm to the environment is material if:
 - It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
 - 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 prescribed by the regulations); and
- 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.

Industry is now required to report pollution incidents **immediately** to the EPA, NSW Health, Fire and Rescue NSW, Safework NSW and the Local Council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so that they will have direct access to the information they need to manage and deal with the incident effectively.

1.4 Responsibilities

1.4.1 Plan Implementation

The Feedlot Manager will be responsible for the implementation of this plan and for the annual review of the PIRMP and for redrafting any sections in need of modification. All records and monitoring data pertaining to this plan must be kept at the premises and maintained for a period of five (5) years.

All workers and any others that are to undertake the activities addressed in this plan must do so in a competent manner, having regard for the general environmental duty of care and due diligence requirements under the POEO Act. Recognition of these requirements is to be part of the site induction process, and brought to the attention of new employees, visitors, or contractors entering the site to undertake actions that may have relevance to the PIRMP.

In the first instance the responsible person for activating, liaison with the EPA and managing the response to a pollution incident will be the Feedlot Manager while on site. Table 1 provides details of the person nominated as being the responsible person.

Table 1: Nominated Responsible Persons

Name	Role	Contact
Person responsible for and authorised to activate the plan		
Colin Crampton	Feedlot Manager	0477 320 816
Person authorised to liaise with the 'relevant authority'		
Colin Crampton	Feedlot Manager	0477 320 816
Person responsible for managing the response to a pollution incident		
Colin Crampton	Feedlot Manager	0477 320 816

1.4.2 Publication of Pollution Monitoring Data

Under the POELA Act, the holder of an EPL is to publish certain monitoring data. In summary, the provisions require that:

- the holder of an EPL who undertakes monitoring as a result of an EPL condition is to publish monitoring data that relates to pollution within 14 days of obtaining the data

- the holder of an EPL who maintains a website, which relates to the business or activity the subject of the EPL, is to make that monitoring data publicly available in a prominent position on the website
- the holder of an EPL who does not maintain a website is to provide a copy of that monitoring data to anyone who requests a copy of that data at no charge
- monitoring data must be published in accordance with requirements issued in writing by the EPA.

1.5 Plan Availability

A copy of this PIRMP is to be maintained at the premises to which the relevant licence relates and be readily available to all personnel and authorised government officers upon request.

Furthermore, the following sections of this PIRMP will be publicly available within fourteen (14) days after the plan has been prepared:

- Section 5.2 Procedure for Notifying Relevant Authorities; and
- Section 5.4 Communication Mechanisms.

The publicly available information may be exclusive of any personal information within the meaning of the *Privacy and Personal Information Protection Act 1998*.

The publicly available information should be posted on the licensee's website (if the licensee has a website) or be provided as hardcopies, without charge, to any person who makes a written request for such copies.

1.6 Site Location

The Tullimba Feedlot is located on two (2) Lots; Lot 1 in Deposited Plan 822779 and Lot 166 in Deposited Plan 753668. The land comprises one property, known as 'Tullimba', within the Local Government Area of Uralla, and consists of an area of approximately 749 Ha. The real property description of the subject land is included in Table 2.

Table 2: Real Property Description

Lot Description	Address
Lot 166 Deposited Plan 753668 Lot 1 DP822779 Lot 2 DP822779	'Tullimba', 1831 Torryburn Road, Torryburn, NSW 2358

Tullimba is located approximately 36 kilometres north-west of the township of Uralla. The site is in a relatively remote area with the nearest off-site residential premises situated approximately 2 kilometres to the north of the feedlot. Figure 1 presents a locality plan for the proposed development.

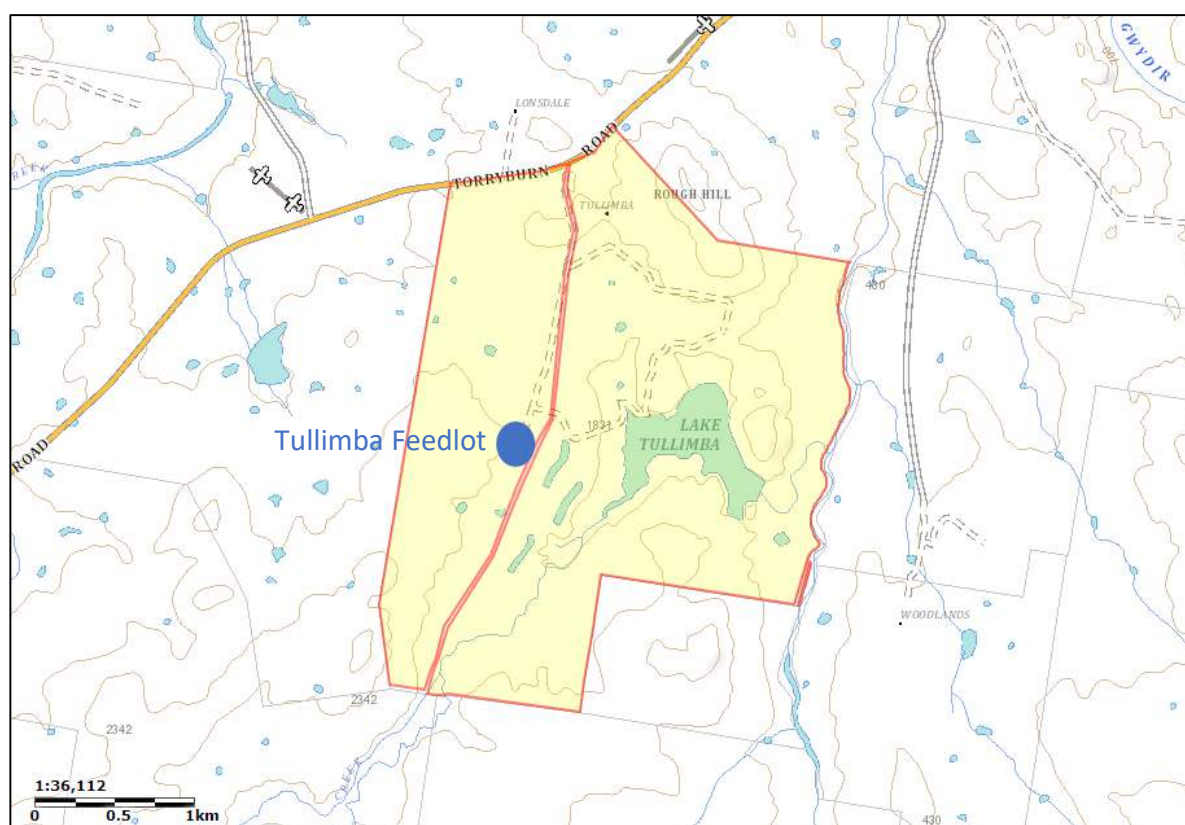


Figure 1: Locality Plan (SIX Maps)

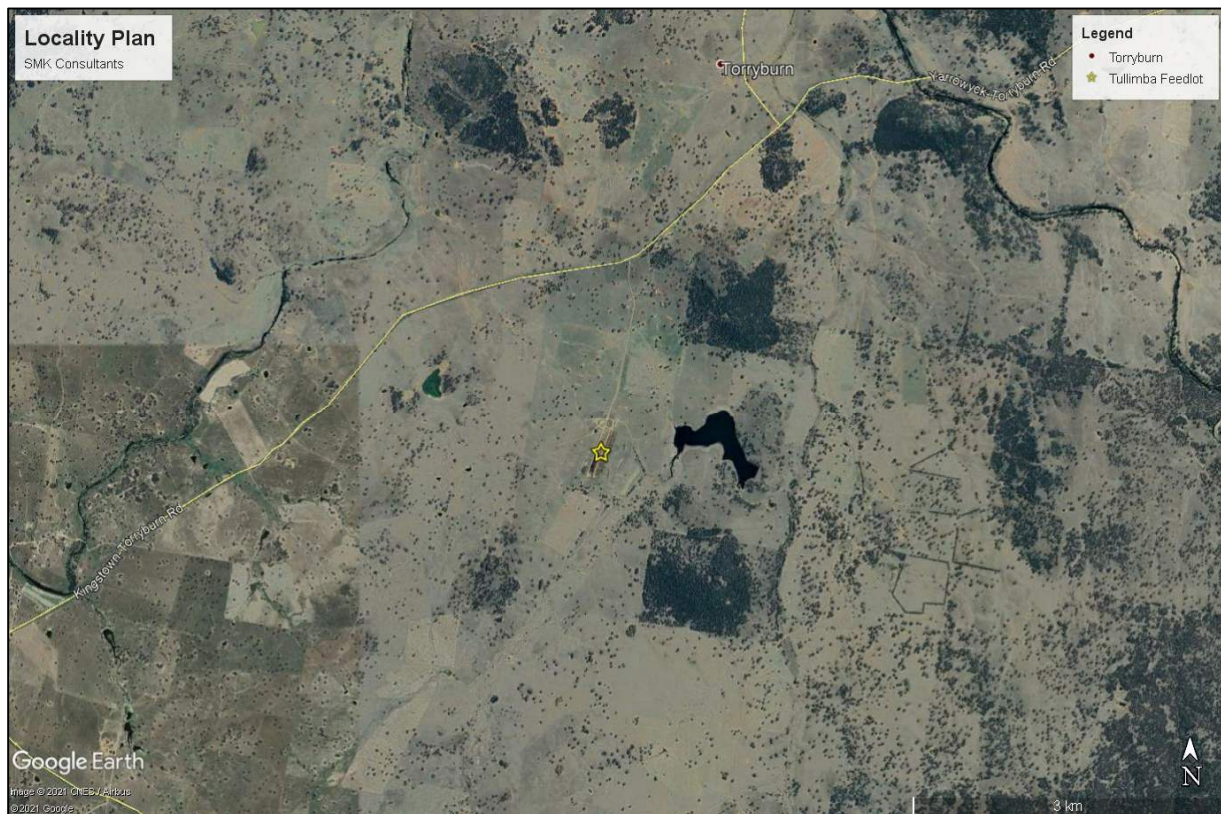


Figure 2: Locality Plan Showing Aerial Imagery (Google Earth 2021)

“Tullimba” lies within the New England Tablelands Bioregion, is located in the Gwydir River Catchment and atop of the New England Fold Belt Groundwater Source. It is not located on flood liable land. While there are some ephemeral and perennial waterways which pass through the property, none of these waterways pass through the feedlot site. During periods of high rainfall, these may swell, but will not generally result in flooding. Surface waterbodies near Tullimba Feedlot consist of the Head Station Creek and Lake Tullimba, located approximately 170m and 220m east of the proposal at their closest points, respectively. Figure 3 shows the location of nearby waterbodies in relation to the proposed feedlot.

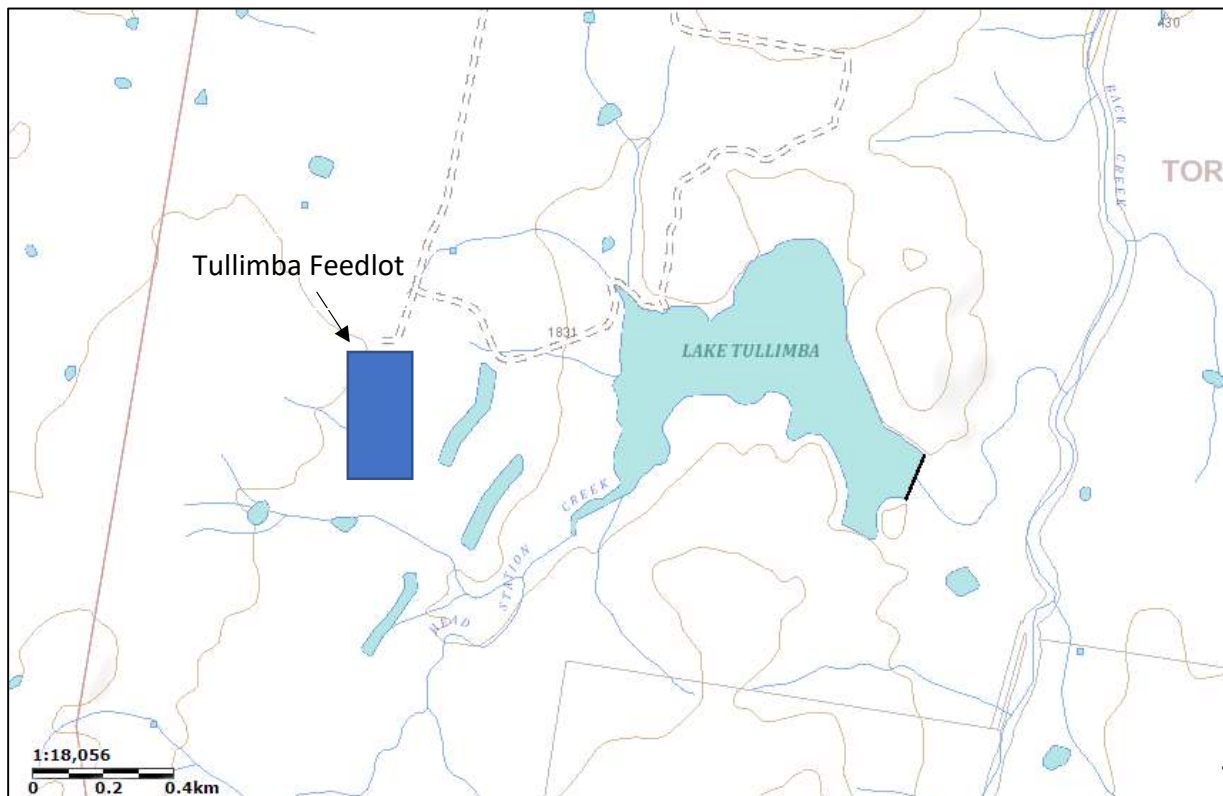
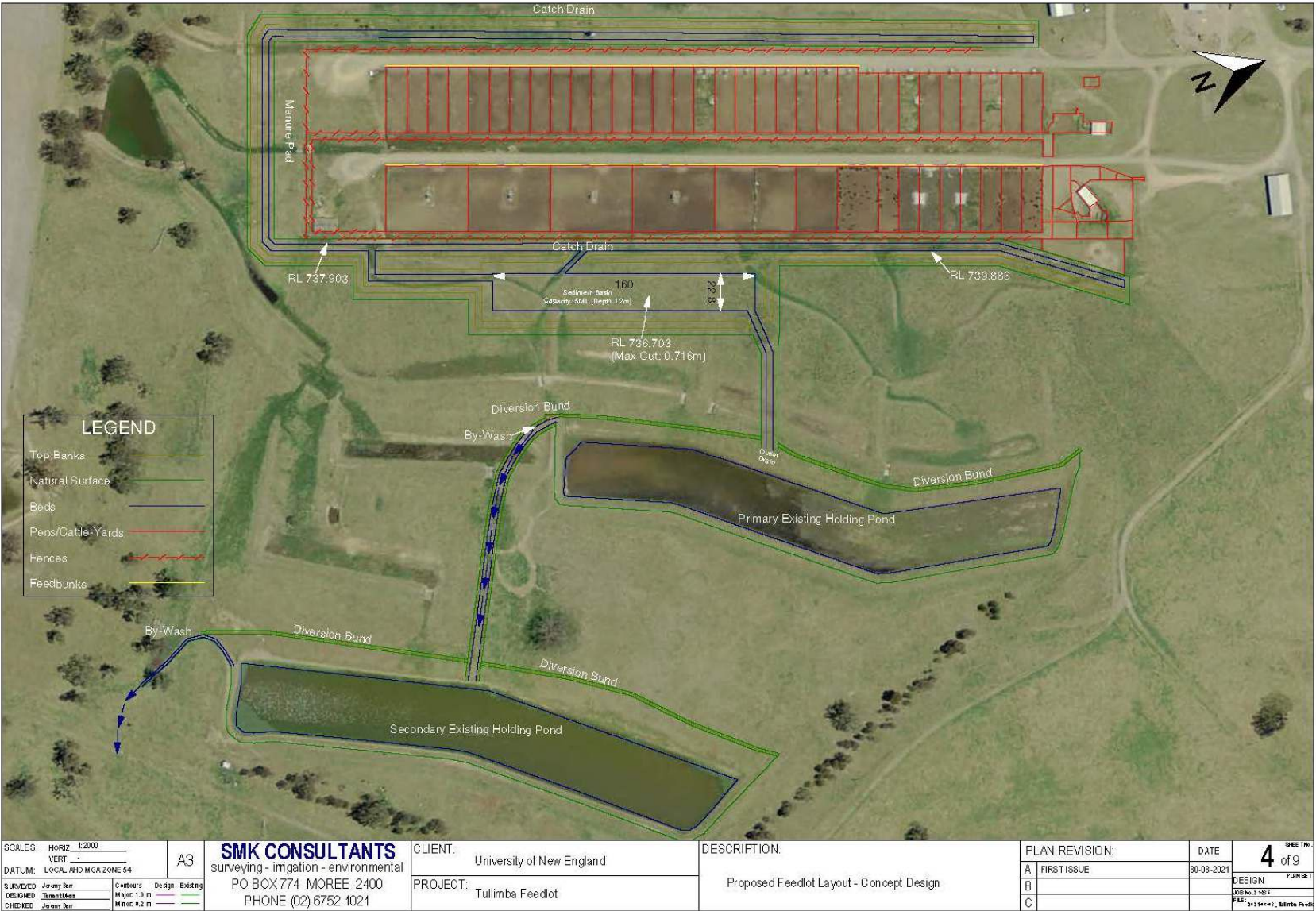


Figure 3: Watercourses surrounding Tullimba Feedlot



2 Site Activities

Tullimba Feedlot is a cattle feedlot operation originally constructed in 1993/1994. The feedlot currently has a maximum capacity of 2,000 head of cattle accommodated at any time.

2.1 Waste storage

2.1.1 Manure Treatment and Storage

Solid waste from pen cleaning and carcass disposal are composted in designated locations within the feedlot controlled drainage area. The composted manure is then disposed of in designated Manure Utilisation Areas on-farm.

2.1.2 Effluent Treatment and Storage

The site has an effluent treatment and storage pond system. All effluent is collected via drains from the feedlot and manure composting areas (the feedlot controlled drainage area). These drains are all directed to the effluent pond system. The location of the pond system is shown above in Figure 4. The effluent ponds combined will hold a minimum of 35 ML of wastewater. Effluent is disposed of via a combination of evaporation and irrigation.

2.2 Chemical Storage

Only a minor amount of chemicals are kept onsite. In general, these will be restricted to small quantities of domestically available materials, herbicides and veterinary treatments. A chemical shed located on a hardstand is used for storing bulk chemicals used for paddock applications. Veterinary drugs and treatments are stored in a drug store in the site office.

3 Hazard Identification and Management

3.1 Hazard Identification

A number of structures and associated activities have been noted as potential operational hazards capable of generating a pollution incident. These hazards associated with chemical use and storage, and management of effluent storage ponds. The identified operational hazards and their associated environmental aspects and impacts are summarised in Table 3.

Table 3: Operational Hazards of the Tullimba Feedlot

Operational Hazard	Environmental Aspect	Associated Impacts
Effluent Treatment and Storage	<ul style="list-style-type: none"> Discharge to surface water Contamination of groundwater Contamination of native habitats 	<ul style="list-style-type: none"> Sedimentation damaging aquatic flora and fauna Degradation of groundwater and groundwater dependent ecosystems Damage to native flora and fauna
Chemical use and storage	<ul style="list-style-type: none"> Discharge to surface water Contamination of groundwater Contamination of native habitats 	<ul style="list-style-type: none"> Degradation of aquatic systems Degradation of groundwater and groundwater dependent ecosystems Toxicity to native flora and fauna

3.2 Potential Pollutants

Table 4 provides an inventory of potential pollutants that will be kept on the premises or used in the carrying out of feedlot activities at the premises.

Table 4: Inventory of Potential Pollutants

Operational Hazard	Environmental Aspect	Associated Impacts
Small volumes of veterinary medicines	Control of stock infections	Small volumes located at the site office.
Effluent	Control of contaminated run-off	Drains are situated along the edges of the controlled drainage area. The effluent ponds are situated east of the site. This is shown in Figure 4.
Solid waste/manure	Control of contaminated run-off	Storage area located on the southern side of the site within the controlled drainage area discharging to the effluent pond. This is shown in Figure 4.

3.3 Distance to Sensitive Receptors

The following sensitive receptors have been identified as being at risk:

Table 5: Distance to Sensitive Receptors

Sensitive Receptors	Distance
General groundwater systems	Underlying the site, minimum depth of 0m in the vicinity of the site at time of site inspection.
Commercial and Industrial supply bore	Approximately 490m north-east of the eastern pens
Nearest Rural Dwelling	Approximately 2 kilometres to the north.
Stock Dams	Approximately 200m south-west (upslope), none downslope of feedlot
Surface water – Head Station Creek	Approximately 170m east at its closest point

3.4 Hazard Risk Analysis

The risk ranking matrix uses a “probability and consequence” risk matrix to assess the likelihood and the severity or consequences of each hazard to give it a “risk rating”. Ranking is given before and after ameliorating measures are applied to mitigate the operational hazards.

Table 6: Risk Rating Matrix

Consequences (C)	Likelihood (L)				
	Rare	Unlikely	Possible	Likely	Certain
Severe	moderate	moderate	high	critical	critical
Major	low	moderate	moderate	high	critical
Moderate	low	moderate	moderate	moderate	high
Minor	very low	low	moderate	moderate	moderate
Negligible	very low	very low	low	low	moderate

The consequences of a development on the environment, public health and amenity are assessed according to the following table:

Table 7: Measure of Consequence

Consequence	Description
Severe	<ul style="list-style-type: none"> Severe and/or permanent damage to the environment/ public health and/ or amenity Irreversible

Consequence	Description
Major	<ul style="list-style-type: none"> Serious and/or long-term impact to the environment/public health and/or amenity Long-term management implications
Moderate	<ul style="list-style-type: none"> Moderate and/or medium-term impact to the environment/public health and/ or amenity Some ongoing management issues
Minor	<ul style="list-style-type: none"> Minor and/or short-term impact to the environment and/ or community Can be effectively managed as a part of normal operations
Negligible	<ul style="list-style-type: none"> Very minor impact to the environment and/ or community Can be effectively managed as a part of normal operations

The following table is used to score the likelihood of the consequence occurring:

Table 8: Probability Table

Likelihood	Description
Certain	Expected to occur in most circumstances
Likely	Will probably occur in most circumstances
Possible	Might occur occasionally
Unlikely	Could occur in some circumstances, but not likely to occur
Rare	May happen only in exceptional circumstances

Using the assessment tool as described above, preliminary environmental risk values for the identified operational hazards of the Tullimba Feedlot operation were determined by SMK Consultants Pty Ltd as shown:

Table 9: Risk Assessment for Tullimba Feedlot

Operational Hazard	Environmental Aspect	Probability	Consequence	Preliminary Risk
Effluent Treatment and Storage	Discharge to surface water	Unlikely	Moderate	Moderate
	Contamination of groundwater	Possible	Major	Moderate
	Contamination of native habitats	Unlikely	Moderate	Moderate
	Discharge to surface water	Rare	Moderate	Low

Operational Hazard	Environmental Aspect	Probability	Consequence	Preliminary Risk
Chemical use and storage	Contamination of groundwater	Rare	Major	Low
	Contamination of native habitats	Rare	Moderate	Low

From the above table it can be seen that the operational risk ranges from 'low' to 'moderate'. Operational hazards associated with 'moderate' risk warrant investigation of mitigation measures. These are detailed below.

3.5 Pre-emptive Risk Reduction Actions

Administrative requirements such as appropriate insurances and/or contingency funds are important to ensure that in the case of a pollution incident are available for management and clean up. In addition the following specific pre-emptive processes should be undertaken to reduce risks to the identified sensitive receptors.

3.5.1 Effluent Drainage and Storage System

- Drains in the controlled drainage system are to be kept free of vegetation and other organic matter, and other readily oxidisable materials.
- Lining materials in the controlled drainage system will be inspected on an annual basis, or after any more frequent cleaning operations to ensure that the lining materials remain adequate.
- Sedimentation and effluent ponds are to be managed with adequate freeboard. If a high intensity rainfall event is forecast, the Feedlot Manager or their delegate must ensure that effluent is managed to prevent a breach.

3.5.2 Chemical Use and Storage

- Do not store large quantities of potentially hazardous liquids on site; and
- Ensure any chemical spill is cleaned up immediately, sharps should be disposed of appropriately.

3.5.3 Excessive Dust

Dust generated by wind, cattle and feedlot activities during periods of hot and dry conditions with low stocking densities poses the greatest risk to human health. In addition, stock trucks entering and leaving the premises, especially early in the morning or late at night can cause dust problems on unsealed roads. During small, medium and large scale on-farm activities the risk of exposure of these pathogens to both onsite workers and visitors to the site is considered low.

The exposure to high dust levels is considered to vary based on weather conditions from low to medium and controls should be put in place as required:

- Maintain routine dust control measures including water spraying, water cannons and soil amendment.
- Personal protective equipment (PPE) to be worn when working in dusty conditions.

3.5.4 Mass Stock Death Event

- Implement appropriate biosecurity measures in accordance with the Biosecurity Response Plan prepared for the Tullimba Feedlot.
- In the event of an emergency disease outbreak, implement the Emergency Animal Disease (EAD) Action Plan for the feedlot. This is included as Appendix D.

3.5.5 Fire

- Site control and machinery maintenance.
- Access to fire extinguishers high pressure wash down hoses.

3.5.6 Inspections

- Visual weekly inspection of the effluent drainage and storage system to identify any potential problems.
- Inspection of integrity of effluent storage pond walls immediately following heavy rainfall and/or overflow.
- Monitoring of nutrients and potential contaminants should be carried out every year for the water supply bore to ensure that its use as a domestic water supply is not compromised.

3.5.7 Communications

- Mobile telephone reception is of good quality on the site and therefore on-site communication in the event of an emergency will be by telephone.

3.6 Residual Environmental Risk

Operational Hazard	Environmental Aspect	Probability	Consequence	Preliminary Risk
Effluent Treatment and Storage	Discharge to surface water	Rare	Moderate	Low
	Contamination of groundwater	Rare	Major	Low
	Contamination of native habitats	Unlikely	Moderate	Moderate

Operational Hazard	Environmental Aspect	Probability	Consequence	Preliminary Risk
Chemical use and storage	Discharge to surface water	Rare	Moderate	Low
	Contamination of groundwater	Rare	Major	Low
	Contamination of native habitats	Rare	Moderate	Low
Excessive Dust	Dust from stock trucks entering and exiting the site	Likely	Minor	Moderate
	Dust from yards and pens that may contain pathogens	Possible	Moderate	Moderate
Mass Stock Death Event	Spread of pathogens, Groundwater contamination	Rare	Major	Low
Fire	Safety	Rare	Major	Low

The residual risks were determined to be 'low' to 'moderate'. While some risks could not be reduced to a 'low' level the practicality of applying further controls may be cost prohibitive, and thus the residual risk is deemed acceptable. Consequently, the proposed management actions would appear capable of providing a suitable level of environmental protection.

4 Pollution Incident Action Plan

4.1 Emergency Response Procedure

The following emergency response procedure shall be adopted if a pollution incident occurs which is likely to cause 'material harm' to the environment (see section 1.2 for definition).

1. The Feedlot Manager, or if unavailable the next in charge, to be notified as soon as practical;
2. Without compromising safety and endangering any lives, first aid should be provided to injured persons and the site Safety Officer notified;
3. Immediate clean-up and containment actions that might mitigate further environmental harm to be undertaken (i.e. containment and clean-up of spills);
4. The designated responsible person to notify the appropriate emergency response agencies immediately;
5. A suitably briefed person is to be sent to meet emergency services at the entry to the site;
6. All work is to stop until it is ascertained that it is safe to return to work. (Ensure all staff are safe and accounted for);
7. Neighbouring properties and potentially affected premises to be notified;
8. Suitable clean-up strategies to be assessed and implemented; and
9. The pollution incident to be recorded and the PIRMP reviewed.

4.2 Procedure for Notifying Relevant Authorities

If a pollution incident presents an immediate threat to human health or property, ring 000. If there is not an immediate threat, then the following authorities must be notified immediately if a pollution incident occurs:

- Environment Protection Authority - Pollution Line (131 555);
- Uralla Shire Council – General Enquiries (02 6778 6300) or;
- Fire and Rescue NSW (000);
- The Minister of Health - via the Tamworth Public Health Unit (02 6767 8630)
- Safework NSW (13 10 50); and
- Police – Armidale (02 6771 0699)

All these authorities must be notified. Although not all will need to act, the protocol requires all these bodies to be notified and then updated as required. Each body will deliver further instructions on their requirements once they understand the nature of the pollution incident.

4.3 Spills

In the event of stormwater pond breach

In the event of a spill or breach of a stormwater holding pond that would result in effluent leaving the property, it is imperative that the following water sampling is undertaken:

- Effluent samples to be collected and sent for laboratory analysis from the overflow of the relevant stormwater holding pond. Sampling to undertaken by a suitably trained person in the methods outlined in AS/NZ 5667.1:1998 and the EPA publication Approved Methods for the Sampling and Analysis of Water Pollutants in New South Wales.

In the event of significant fuel spillage

- Assess the scene for danger, ensure that there is no danger to yourself or others.
- Identify source of spill and prevent further spillage as far as is practical. Apply absorbent material or catch tray as appropriate (spill containment measures).
- Turn off any running machinery.
- Notify the site manager and relevant authorities.
- Clean-up attempt to be made with appropriate PPE.

4.4 Excessive Dust

- Water internal, unsealed roads and other trafficked areas as required.
- Soil amendment, water sprays or water cannons within yards and pens.
- Notify the Notify General Manager, Farm Manager, Livestock Manager and Feedlot Manager and Uralla Shire Council (refer to contact details displayed in Section 4.2).

4.5 Mass Stock Death Event

- In the event of an Emergency Animal Disease (EAD) outbreak the Australian Veterinary Emergency Plan (AUSVETPLAN) Enterprise for Beef Cattle Feedlots will be invoked. The Feedlot will be required to:
 - Quarantine the premises and/or control movements;
 - Destroy and dispose of infected and exposed susceptible animals;
 - Decontaminate infected premises;
 - Conduct surveillance of susceptible animals; and
 - Restrict certain activities.
- Personnel at the Feedlot will call the NSW DPI 24-hour Emergency Animal Disease Hotline on 1800 675 888 to notify the authorities of any notifiable diseases.
- Mass mortalities buried on-site in a bunded pit and covered by 1m of clay once an investigation is completed to determine the cause of the deaths.

- Ensure that the lining of the pit is impermeable. This would be achieved by lining the pit with at least 300mm of clay or other suitable compactable soil able to provide a design permeability of $<1 \times 10^{-9}$ m/s (~ 0.1 mm/d). E.g. mixing and compacting on-site material with other materials such as bentonite clay where the underlying soil/rock does not naturally achieve this level of permeability.

4.6 Communication Mechanisms

Mobile telephone reception is of good quality on the site. Therefore, on-site communication in the event of an emergency will be by telephone. Communication to authorities and emergency services will need to be undertaken by mobile.

The owners and occupiers of the adjacent property shall be contacted as soon as practical in case of a pollution incident. Contact shall be by telephone or in person. A list of neighbouring properties and their contact details is provided in Appendix B.

Following the incident updates will be given via email, telephone or in-person as requested by the party.

4.7 Incident Reporting

The Feedlot Manager is to be notified of all pollution incidents. Where the incident has the potential to cause 'environmental harm', the Feedlot Manager is to be notified immediately.

4.8 Incident Records

Where a pollution incident occurs, the Feedlot Manager is to record the incident in an Environmental Incident Register, which should be kept at the premises and report on the following:

- The date and nature of the incident;
- The response made;
- The results of measures taken to rectify the situation;
- Any monitoring data or other evidence collected that would indicate the nature and scale of the incident and the success of the response made; and
- Any corrective action taken to ensure that the incident does not reoccur.

4.9 First Aid and Safety

First-Aid equipment can be found at the site office. MSDS for all chemicals stored and used on the premises are located at the site office.

Safety equipment is located at the site office. Safety equipment shall be used and worn as required when dealing with a pollution incident and includes but is not limited to:

- Personal protective equipment (PPE); and
- Spill containment equipment (if available).

5 PIRMP Testing and Review

This PIRMP is tested and reviewed once every twelve (12) months and within one (1) month after every pollution incident to ensure that the information included in this plan is accurate and up to date, and that adequate controls are upheld. The review should include:

- Update contact details of all responsible persons, neighbours and relevant authorities;
- Effectiveness of actions taken during a pollution incident; and
- Add or remove hazards as appropriate. It may be relevant to reassess the risk analysis.

Further information to be considered when reviewing the plan should include complaints, incidents, monitoring data and the results of any audit and inspection. The frequency of reviews may be revised where it can be demonstrated that the alternative frequency does not increase either the likelihood of environmental harm or the risk to human health and safety.

The testing of this plan may include practical exercises and drills and shall cover all components of this plan, including the effectiveness of the training undertaken.

A testing register is provided in Appendix A.

5.1 Staff Training

Staff induction and training forms should include reference to PIRMP training. All staff working on site will need to be trained in the requirements of the PIRMP and records of this training maintained with general staff training records. Staff training could include toolbox talks, formal staff training on incident management and undertaking simulated incident exercises including with emergency services. Staff training should be suitable for the level of risk and likelihood of incidents to ensure that staff are trained to act confidently and efficiently in case of a pollution incident.

The content of this plan should be discussed with all personnel at least once every twelve (12) months. It is noted that it is the responsibility of the licensee to ensure that this PIRMP is accurate and capable of being implemented in an effective manner.

5.2 Non-conformance and Corrective Actions

The Feedlot Manager is to ensure that appropriate corrective actions are implemented within an appropriate time frame, to allow for continued compliance with this management plan and any relevant development consent or licence conditions.

6 References

EPA, 2012. Approved Methods for the Sampling and Analysis of Water Pollutants in New South Wales. NSW Environmental Protection Authority.

EPA, 2012. Environmental guidelines: Preparation of pollution incident response management plans. NSW. Environment Protection Authority.

Google Earth, 2020. Image© 2021 CNES / Airbus. Google Earth.

Land and Property Information (LPI) 2021, Spatial Information eXchange – Six Viewer, NSW Government. Available from: <https://maps.six.nsw.gov.au/>

Appendix A: PIRMP Testing Records

Testing Date	Type of Test (e.g. desktop/exercise)	Tested by	Details, notes, issues or improvements

Appendix B: Neighbours Contact List

Neighbour	Contact Person	Contact Details
'Londsdale', 2270 Torryburn Road	John Cassidy	-
430 Woodlands Road	Jamie Swales	-
430 Woodlands Road	Jamie Swales	-
430 Woodlands Road	Jamie Swales	-
430 Woodlands Road	Jamie Swales	-
'Carlowrie', 132 Carlowrie Road	John Mitchell	-
'Marglen', 2270 Torryburn Road	John Cassidy	-
'Naroda', 2342 Torryburn Road	John Cassidy	-
'Carlowrie', 132 Carlowrie Road	John Mitchell	-
'Naralgun', 639 Torryburn Road	Aldo Danieli	-

Appendix C: Site Plan

Appendix D: Emergency Animal Disease (EAD) Action Plan

Appendix E: Environmental Protection Licence