



**PARAWAY  
PASTORAL CO.**

# *Pollution Incident Response Management Plan*

*Old Bundemar Feedlot  
Bundemar Road  
Trangie NSW 2823*

*Prepared by:*

*Paraway Pastoral Company Limited  
70 McNamara Street  
Orange NSW 2800*





## **Background**

*This document has been prepared to comply with Paraway's obligations under the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) and Environmental Protection Licence No. 13143.*

*Under the POELA Act Licence holders are required to prepare, keep, publish, test and implement a pollution Incident Response Management Plan (PIRMP). The objectives of the plan are to:*

- Enable timely communication about a pollution incident to staff at the premises, Environment Protection Authority (EPA), other relevant authorities specified in the act (including local councils, NSW ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and any other persons outside the facility who may be affected by the impacts of a pollution incident.*
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risk and development of actions to minimise and manage those risks.*
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.*

*A 'pollution incident' is 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 does not include an incident or set of circumstances involving only the emissions of any noise (EPA, 2012).*

*Incidents that cause or threaten the material environment harm are required to be notifiable environment incidents under the PIRMP.*

## **Objectives**

*This document details the procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment.*

*The objectives are to:*

- provide procedures to be followed to control or minimise pollution incidents;*
- Ensure that reporting of a pollution incident is in accordance with the POELA Act.*



## Site Information

**Site Operator:** Paraway Pastoral Company Limited

**Address:** 70 McNamara Street  
Orange NSW 2800

**Feedlot Location:** Old Bundemar, Trangie NSW 2823

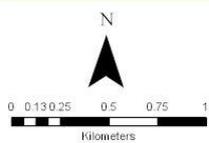
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**Shire:** Warren

**EPA Licence Number:** 13143



Figure 1 Site Location



- Legend
- Property Boundary
  - By-product Reuse Area
  - Feedlot

**Old Bundemar**  
Feedlot Features



Date Exported: 14/02/2019

Figure 2 Feedlot Features



### ***Surrounding Land Use***

*Surrounding area is comprised of rural land and supports sheep and cattle grazing and both irrigated and dryland cropping.*

### ***Neighbouring Properties***

*Approximately three (3) kilometres west of the feedlot is the nearest neighbour and four (4) kilometres east of the feedlot site.*

### ***Neighbouring Properties Contact Details***

*Below provides a list of the two (2) nearest neighbouring properties most likely to be affected in the event of a pollution incident.*

<i>Name</i>	<i>Property Name</i>	<i>Distance/Direction</i>	<i>Contact Number</i>
<i>Mal McKay</i>	<i>Mathalabah</i>	<i>3kms west</i>	<i>02 6888 9640</i>
<i>Mick Day</i>	<i>Bundemar</i>	<i>4kms east</i>	<i>02 6888 9625</i>

### ***Surrounding Sensitive Environments***

- In the immediate proximity of the feedlot there are no sensitive environmental receptors.*
- The feedlot is approximately 500 metres north of Ewenmar creek.*
- Supply channels and embankments, generally with a 0.8 – 1.0 metres provide a bund between the feedlot and the creek.*

### ***Stormwater Plan***

*Stormwater that falls on the feedlot site drains to sedimentation and effluent holding dams where it evaporates or can be mixed with irrigation water and applied to crops. Drains are inspected quarterly. Inspection of the effluent structures is undertaken to ensure adequate volumetric capacity in case of heavy rainfall.*

## Environment Hazards

Below are the identified environment hazards/risks for the feedlot site.

<i>Hazard</i>	<i>Hazardous Event</i>	<i>Likelihood</i>	<i>Events that may increase likelihood</i>
<b>Offsite effluent discharge</b>	<i>Contaminated Water offsite</i>	<i>Unlikely NOTE: Containment of feedlot by irrigation channel embankments and dilution effects</i>	<i>Heavy rainfall in excess of the design parameters</i>
<b>Offsite Manure Discharge</b>	<i>Manure escapes containment area</i>	<i>Unlikely NOTE: Containment of feedlot by irrigation channel embankments and dilution effects</i>	<i>Heavy rainfall in excess of the design parameters</i>
<b>Odour Emission</b>	<i>Persistent odour event</i>	<i>Unlikely NOTE: Regular turning of manure stockpiles prevents anaerobic conditions</i>	<i>Breakdown in treatment system, excessive build-up of solids prior to spreading and prolonged wet weather</i>
<b>Dust Emissions</b>	<i>Dust blown from feeding pens</i>	<i>Unlikely NOTE: Significant buffer distance to nearest neighbouring residence</i>	<i>Dry windy conditions and inadequate pen cleaning and manure management</i>
<b>Noise Emissions</b>	<i>Noise impacting on amenity of local community</i>	<i>Unlikely NOTE: Significant buffer distance to nearest neighbouring residences</i>	<i>After hours transport of livestock</i>





*Methodology of the likelihood of hazard occurring*

<i>Likelihood</i>	<i>Description</i>
<i>Almost Certain</i>	<i>Most likely to occur</i>
<i>Very Likely</i>	<i>Could occur frequently</i>
<i>Likely</i>	<i>Could occur occasionally</i>
<i>Unlikely</i>	<i>Could occur but unlikely</i>
<i>Very Unlikely</i>	<i>Has never happened but is possible</i>
<i>Very Rare</i>	<i>Not known to have ever happened anywhere</i>

*Potential Pollutants*

<i>Potential Pollutant</i>	<i>Description/Use</i>	<i>Quantity</i>
<i>Feedlot Effluent</i>	<i>Stormwater runoff from feeding pens drains to sedimentation pond and effluent holding dam. Feedlot effluent is evaporated or mixed with channel water and irrigated onto crops</i>	<i>Design storm is 1-20 year, 24 hour rainfall event sedimentation point 1.75ML holding Dam 7.92ML</i>
<i>Feedlot Manure</i>	<i>Manure is cleaned from feeding pens, stockpiled regularly turned to prevent anaerobic conditions and spread at sustainable rates on cropping paddock</i>	<i>2000 tonnes per annum</i>





### ***Pre-Emptive Actions***

*Descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to the environment arising from the activities undertaken at this premises are listed below:*

- *Implementation of the Feedlot Environmental Code of Practice*
  - *Refer to Attachment 1. Including:*
  - *Feedlot Effluent*
  - *Feedlot Manure*
  - *Odour Emissions*
  - *Dust Emissions*
  - *Noise Emissions*
- *Implementation of regular environmental monitoring program in accordance with EPA License No.13143.*

### ***Hazardous Material***

*Chemicals used in the cropping and livestock activities are stored on the property. All hazardous material are stored in line with best practise safety and environmental processes. All fuel stored in greater than 10,000L vessels and all dangerous goods are stored in facilities with secondary containment.*

*Approach cautiously from upwind, uphill or upstream:*

- *Stay clear of vapour, fumes, smoke and spills*
- *Keep vehicle at a safe distance from the scene*

*Secure the Scene:*

- *Isolate the area and protect yourself and others*

*Identify the hazards using any of the following:*

- *Placards*
- *Container Labels*
- *Material Safety Data Sheets (MSDS)*
- *Knowledge of persons on scene*
- *Consult applicable guide page*

*Assess the situation:*

- *Is there a fire, a spill or a leak?*
- *What are the weather conditions?*
- *What is the terrain like?*
- *Who/What is at risk: people, property or the environment?*



- *What actions should be taken- evacuation, shelter in-place or dike?*
- *What resources (human and equipment) are required?*
- *What can be done immediately?*

*Obtain Help:*

- *Advise your headquarters to notify responsible agencies and call for assistance from qualified personnel*

*Respond:*

- *Enter only when wearing appropriate protective gear*
- *Rescue attempts and protecting property must be weighed against you becoming part of the problem*
- *Establish a command post and lines of communication*
- *Continually reassess the situation and modify response accordingly*
- *Consider safety of people in the immediate area first, including your own safety*



## **MANAGEMENT AND RESPONSIBILITIES**

### ***Legal Duty to Notify***

*All employees are responsible for alerting the Manager of the property or other management personnel to all environmental incidents or hazards which may result in an environmental incident, regardless of the nature or scale.*

*The responsibility to notify EPA and other agencies is detailed in the POEO Act (Section 148), which encompasses all site personnel, including contractors and sub-contractors.*

### ***Site Responsibilities***

*The Manager of the property is accountable for the specific responsibilities associated with the management and implementation of the PIRMP for the feedlot.*

<i>Position</i>	<i>Name</i>	<i>Mobile</i>	<i>Station</i>
<b>Manager</b>	Angus Andrews	0429 888 398	026888 9789

*The Manager will ensure the following actions are carried out:*

- Assess the damage and recommend appropriate clean up and/or quarantine measures*
- Advise Paraway Orange Office and EPA (if required)*
- Appoint appropriately qualified personnel to carry out clean up*
- Complete an incident Report Form and send a copy to the Paraway Orange Office and EPA*

*The Manager will liaise with and be supported by the following management personnel as required:*

<i>Position</i>	<i>Name</i>	<i>Mobile</i>
<b>Environment and Sustainability Manager</b>	Paul McDougall	0414 344 464

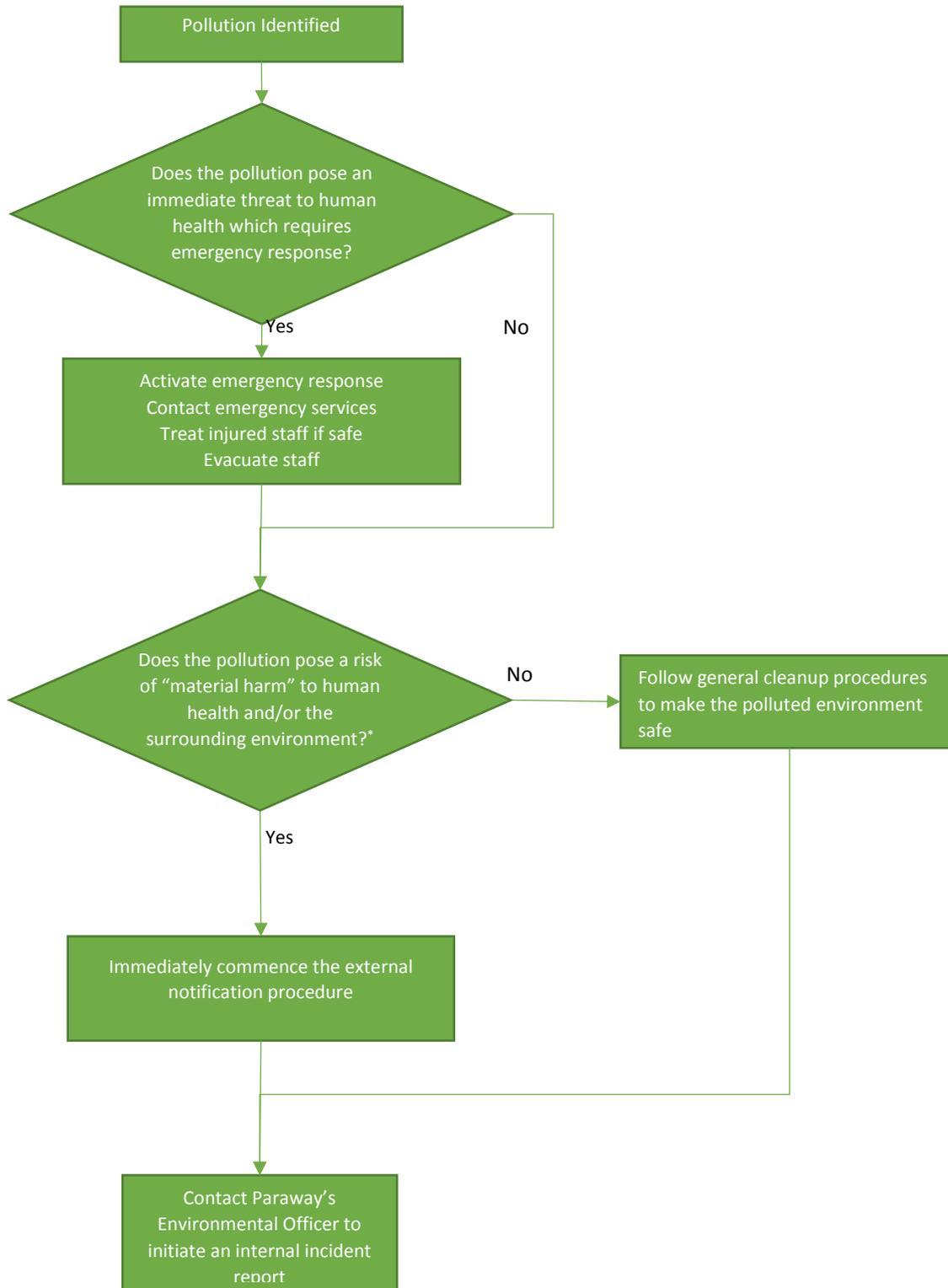


## ***INCIDENT MANAGEMENT***

*Industry is now required to report pollution incidents immediately to the EPA, and where relevant, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local Council. 'Immediately' means promptly and without delay.*

*If in the case of a pollution incident (as defined in section 1.1), the incident presents an immediate threat to human health or property the site must immediately contact 000 prior to any other action.*

*Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents. If the incident does not pose any threat to human health or property, concurrently with contacting 000, all possible actions should be taken to control the pollution incident and minimise health, safety and environmental consequences. See flow chart below:*





### **Material Harm**

*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:*

*(a) harm to the environment is material if:*

- (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by regulations), and*

*(b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

### **Site Contact Details**

*The Manager is in charge of coordinating and managing the response with the EPA. The Manager is identified as the most senior officer on the property and has authority to enact this plan.*

<i>Position</i>	<i>Name</i>	<i>Mobile</i>	<i>Station</i>
<b>Manager</b>	Angus Andrews	0429 888 398	026888 9789



## ***External Notification Procedure***

*Notification of an incident causing or threatening material harm to the environment is the responsibility of all site and contractor personnel. In the instance of identification of a pollution incident, the personnel will report the issue immediately to the Manager, who will follow the incident reporting procedures in accordance with EPA requirements as per Part 5.7 of the Act.*

*The following external agencies must be contacted immediately following a pollution incident:*

<i>Organisation</i>	<i>Contact Details</i>
<i>Fire &amp; Rescue NSW/Ambulance</i>	<i>000</i>
<i>EPA NSW</i>	<i>131 555</i>
<i>NSW Health</i>	<i>6809 8979, 6885 8666 (after hours)</i>
<i>SafeWork NSW</i>	<i>13 10 50</i>
<i>Warren Shire Council</i>	<i>6847 6600</i>

## ***Community Notification***

*In the event of a pollution incident, the Manager will contact the nearest neighbours as required. See section 2.4 for details of nearby neighbours and contact details.*

*In determining the extent of community notification the Manager will consider aspects such as the type of pollutant, prevailing winds, the location of any on-site or off-site impacts, the likelihood of the pollutant reaching neighbouring properties, and possible impacts on sensitive environments.*

## ***Training and Testing***

### ***Training***

*All personnel in charge or who may be delegated site responsibility will be trained in implementing this plan. Training will be conducted annually.*

### ***Testing and Review***

*This Plan will be tested at least once every 12 months. The testing will be carried out to ensure that the information included in the plan is accurate and up to date, and that the plan is capable of being implemented in a workable*



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*and effective manner*

*Testing is taken to be either a desktop review or an environmental emergency drill procedure*

*This Plan will also be tested within one month of any pollution incident occurring in the course of an activity to which the licence relates. This is to confirm, in light of a recent 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.*



## ***Effluent Management***

### ***Environmental Goal***

*To ensure effluent generated from the feedlot flows via the sedimentation system to the effluent holding dam for disposal by irrigation to cereal crops*

### ***Management***

- *The existing feedlot comprises Stage 1, sixteen (16) pens of 1000 sheep each*
- *The feedlot site is a confined drainage area*
- *Earth works design is based on the National Guidelines for Beef Cattle Feedlots in Australia*
- *Feedlot design ensures that runoff from feeding pens drains via the sedimentation system (1.75 ML) where solids from the feedlot are removed by settling*
- *Effluent discharges to the effluent holding dam (7.9ML)*
- *Effluent is temporarily stored prior to it being mixed with channel water and irrigated onto cereal crops*
- *Environmentally sustainable effluent reuse by irrigation is based on balancing the nutrients applied with that taken up and removed by vegetation harvesting operations*
- *The solids/sludge accumulated in the sedimentation structure to be removed prior to the loss of 15% of its capacity from sediment build up*
- *Solids/sludge is to be disposed of by sustainable applications to cropping paddocks*

### ***Monitoring***

- *Regularly check drainage works associated with the controlled drainage area to ensure effective on-going operation.*
- *Routinely check sedimentation & effluent holding structures to ensure effective on-going performance and particularly after rainfall events*



## ***Manure Management***

### ***Environmental Goal***

*To ensure that the manure generated from the feedlot is spread onto cropping paddocks on a sustainable basis and does not pollute the environment*

### ***Management***

- *Manure removed from feeding pens is regarded as a valuable resource comprising a nutrient rich soil conditioner*
- *Manure will be cleaned from the feeding pens on a quarterly basis helping to ensure that the pens are well cleaned and have a good surface condition going into winter*
- *Great care will be taken not to disturb the integrity of the relatively impermeable 20 - 50 mm compacted manure /soil interfacial layer*
- *The mass of manure generated in sheep feedlots is assumed to be approximately 150 Kg per sheep annually i.e. ~2000 tonnes of manure will be generated in the feedlot per year*
- *Manure will be temporarily stockpiled in windrows on a compacted clay pad within the controlled drainage area*
- *Solids cleaned from the sedimentation systems will be mixed with the stockpiled manure*
- *The proposed method of beneficially utilising feedlot manure is to spread it onto cropping paddocks (The property covers an area of~ 60000 acres with a large proportion of this area being arable)*
- *Stockpiled manure will be regularly spread, subject to agronomic considerations and seasonal conditions, onto cropping land*
- *A manure application rate of ~12 tonnes/hectare has been shown to have long term sustainability*

### ***Monitoring***

- *Regularly check manure stockpiles to help minimize any adverse effects from temporary storage operations*



## ***Odour Control***

### ***Environmental Goal***

*To minimize odour generation from the feedlot.*

### ***Management***

- *Potential odour sources include feeding pens, sedimentation structures, effluent holding dam and the manure storage area*
- *The choice of a relatively well drained site along with the employment of industry feedlot design principles and the relative isolation of the site from neighbouring residences will help in minimizing offensive feedlot odour*

*The following best management practices have been adopted:*

- *Containment of the feedlot from extraneous surface run-on water*
- *Safe conveyance of feedlot runoff to the sedimentation & effluent storage structures*
- *Regularly maintain & clean surface drainage works*
- *Remove solids deposited in the sedimentation structure to the manure stockpile site as soon as practical after a storm event*
- *Note wind direction relative to neighbouring residences to minimise any adverse impact on neighbours when undertaking pen cleaning operations*
- *Clean feeding pens at least quarterly or more frequently as appropriate*
- *Spread stockpiled manure onto soil as soon as practical after pen cleaning, subject to agronomic considerations*
- *Diligently manage stockpiled manure including regular turning to aerate windrows and to assist in processing the manure into a moist and crumbly dark soil conditioning matter*
- *Ensure that any spilt feed is cleaned up asap*
- *Regularly maintain feed troughs, water troughs and the reticulated water supply system generally, to help prevent spillage*
- *Promptly dispose of any dead animals*

### ***Monitoring***

*Monitor the number of odour complaints received on a regular basis.*



## ***Dust Control***

### ***Environmental Goal***

*To prevent air pollution and prevent degradation of the local amenity from feedlot operations.*

### ***Management***

- *The feedlot has been sited well within the property boundaries*
- *There is a buffer distance of approximately 3 kilometres to the nearest neighbouring residence west of the feedlot*
- *It is generally accepted that where the separation distance is sufficient to limit noise and odour nuisance on neighbours, dust impact should also be minimal*
- *All practical measures will be taken to minimize dust emissions arising from the operation of the feedlot including:*
- *Minimising and restricting vehicle movements to specified routes*
- *Revegetation of disturbed areas and maintenance of vegetation cover, as appropriate, within the controlled drainage area of the feedlot*

### ***Monitoring***

*Monitor the number of dust complaints received on a regular basis.*



## **Noise Control**

### **Environmental Goal**

*To minimize noise generation from feedlot operations.*

### **Management**

- *The landowners decision to locate the feedlot at an isolated site away from neighbouring residences helps in minimizing the potential for noise impact*
- *There is a buffer distance of approximately ~3 kilometres to the nearest neighbouring residence west of the feedlot*
- *Note that it is generally accepted that where the separation distance is sufficient to limit odour nuisance on neighbours, adverse impacts due to noise is adequately addressed*
- *Potential noise sources include stock unloading & handling operations, feed mixing and vehicular movements*
- *The following noise control measures have been adopted:*
- *noisy operations such as stock unloading and handling to be conducted during daylight hours where possible*
- *equipment to be operated as per manufacturers recommendations and maintained in proper working order*
- *maintain existing tree cover between feedlot operations and the neighbour to the west to assist in attenuation of noise emissions from the feedlot*

### **Monitoring**

*Monitor the number of noise complaints received on a regular basis.*