

Annual Compliance Plan 2014-15

An outline of EPA's key compliance
and enforcement priorities and projects in 2014-15

ENVIRONMENT PROTECTION AUTHORITY



EPA Victoria's regions and office locations



1300 EPA VIC (1300 372 842)

www.epa.vic.gov.au

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1. Foreword: Message from the Director

I am very pleased to present EPA's Annual Compliance Plan (ACP) for 2014-15. The intent of this plan is to enable business, the community and government organisations to understand where EPA will be focusing its compliance effort for the year ahead and for them to prepare accordingly. It is also a commitment to Victorians that EPA will continue protecting the environment and Victoria's future.

In 2013-14 EPA continued to deliver on its *5 Year Plan* through the development of our people, improvement in our business systems, and delivery of strategic programs and prioritised activities. EPA delivered the majority of the commitments made within the ACP whilst improving many internal processes. EPA trained 14 new authorised officers through our specifically designed three-month intensive authorised officer course, and delivered a sustained emergency response to the long-running Hazelwood open cut mine fire. In responding to this event, EPA officers from across the state conducted hundreds of field inspections to monitor the impact the fire was having on the environment in and around Morwell. The fire response challenged our delivery of the ACP, but it also demonstrated that EPA is able to respond to a sustained emergency incident and still perform other critical work.

In 2014-15, EPA will continue to work on the top six complex environmental problem areas identified in 2012-13, and continue to deliver related compliance and enforcement projects. EPA will also embed stronger risk and evidence-based prioritisation to target sites for compliance monitoring. We will collaborate across our network of co-regulators to gather intelligence and to identify other priority issues and/or sites.

Attending to all environmental problems is an ongoing challenge for environmental regulators. We will continue to regularly prioritise our list of activities and focus our available resources on the most critical issues. One way we will do this is by ensuring we look for emerging trends and patterns in pollution reports, and address problems strategically rather than reactively. In the last two years we have been working to build a flexible and effective field force which is able to consistently address the right issues in the right way across the state.

We ask for your continued support in helping us protect Victoria's environment. Remember to report pollution that you see in your community, review your operations, see where improvements can be made (no matter the size), and engage with your industry to make sure that you and your peers stand out as good environmental citizens. EPA needs both your support and engagement in the effort to create a productive and liveable Victoria for all.

Thank you.

Elizabeth Radcliffe
Director - Environmental Regulation



2. Our regulatory approach

The Environment Protection Authority, Victoria monitors and regulates the environmental impacts of businesses and industry under the powers granted by the *Environment Protection Act 1970* (EP Act), so that all Victorians can enjoy a safe and healthy environment. We aim to be an effective and influential environmental regulator that exercises its powers fairly and transparently.

- We will be risk-based in what we do to focus our effort and resources where they are needed the most. We will do this by establishing risk-based decision models to prioritise our work.
- Our decisions will be based on scientific and intelligence-based evidence that include environmental quality data, compliance history data and reports from government departments, co-regulators, businesses and members of the public.
- We will set ourselves targets for priority activity areas and report on how we are performing against them to remain accountable as a regulator.

Compliance - following the law, obtaining the right approvals or permissions, and conducting activities in accordance with requirements - is the responsibility of all businesses, organisations, governments and individuals. Everyone has obligations under the law. All parties have a social duty of care to the environment to reduce their environmental impact and ensure that future generations experience a clean and improved environment. All duty holders are accountable to the regulator and the public to prevent and minimise environmental harm.

EPA undertakes a range of activities on behalf of the Victorian community to achieve compliance with the EP Act. EPA's regulatory approach takes the form of several linked elements as represented in EPA's Operating Model (Figure 1). We monitor compliance levels, encourage higher performers, educate business about their legal obligations, set standards for a productive and liveable Victoria and support compliance by providing timely and relevant advice and by making our expectations clear.



Figure 1: EPA's Operating Model

Where non-compliance, or likely non-compliance, is found, EPA will seek to remedy or prevent the harm using advice, directions or remedial notices. Where appropriate, EPA will enforce the law using sanctions such as official warnings, penalty infringement notices and prosecutions. To find out more about how EPA regulates and enforces the law and what factors it will take into account when imposing a sanction, see EPA's [Compliance and Enforcement Policy](#) (publication 1388) on EPA's website. If you are aware that your facility is not compliant, contact EPA immediately on 1300 EPA VIC (1300 372 842). When considering our response to non-compliances, we take site-specific circumstances including self-reporting into consideration in accordance with our Compliance and Enforcement Policy.

3. Summary of activities in the Annual Compliance Plan

EPA's compliance activities fall under three broad categories: strategic projects, compliance maintenance and pollution response. Each category requires a different approach to risk assessment, resource allocation and problem solving.

In addition, officers across EPA will allocate time to achieving compliance outcomes using engagement, targeted campaigns and collaborative approaches if they determine these approaches to be the most effective methods. In 2014-15:

- thirty per cent of our work will be directed towards strategic compliance activities.
- forty per cent of our work will be allocated to maintaining compliance oversight of statutory tools and programs regulated by EPA, including checking compliance with notices
- thirty per cent of our work will be allocated to responding to high-risk pollution incidents.

We recognise that we cannot predict all compliance and enforcement requirements at the beginning of the year. The overall allocation will be reassessed through the year to account for any changes in priorities or resources; however, we have estimated we have the capacity to complete approximately 3,500 compliance inspections including associated follow up compliance and enforcement activity in accordance with our [Compliance and Enforcement Policy](#) during 2014-15.



Figure 2: Planned proportion of EPA's compliance and enforcement work in 2014-15

4. Strategic compliance projects

Strategic activities aim to address potential environmental harms or resolve long-standing priority compliance issues by using a variety of different approaches. Complex environmental problems cannot always be solved using traditional compliance approaches and often projects will run over several years and require input from EPA's many areas. The strategic projects detailed in this document will employ a combination of elements identified in EPA's Operating Model, shown on page 3.

In 2012-13 EPA applied a risk identification process to select six areas for the organisation to focus on until 2016.

1. Contaminated environments (land and groundwater).
2. Illegal waste disposal.
3. Landfills.
4. Organic waste.
5. Residential encroachment on critical industries.
6. Stormwater contamination.

For more information about how these areas were chosen and what we are doing to address them, refer to the EPA [Annual Plan 2014-15](#).

EPA will deliver several statewide and regional strategic projects associated with these six areas. We will also address priority regional pollution and compliance problems through our strategic compliance activities.

4.1 Statewide strategic projects

Statewide strategic projects consider broader issues that have the potential to impact the environment in a similar way across the state, or where an industry-wide compliance approach is required.

Below is a summary of the statewide strategic projects for 2014-15. For more information about what EPA will be focusing on, what you can do to prepare for an EPA visit, and additional guidance material, visit the Annual Compliance Plan 2014-15 in the Compliance and Enforcement section of [EPA's website](#).

4.1.1 Contaminated environments - underground petroleum storage systems at service stations

Contamination can affect human health and the environment depending on what and where the contamination is, how much there is of it and what the exposure pathways are. One source of contamination is leaking underground petroleum storage systems

(UPSS) at service stations. The release of petroleum-based substances into the environment often results in significant impacts on groundwater and surface water ecosystems, makes the groundwater unsuitable for use and can pose a vapour risk to residential developments. UPSS are a key concern due to their size and proximity to communities.

EPA has established a project to reduce the unacceptable risk posed by contamination of soil and groundwater from UPSS leaking at operational service stations.

4.1.2 Illegal waste disposal

Illegal waste disposal threatens Victoria's high standard of waste management and recycling and increases the risk to the environment. When wastes are not disposed of appropriately, using the correct disposal, reuse or recycling facilities, it also hinders development in the legitimate waste industry. Government-sponsored investment in waste management is also reduced due to lost landfill levies.

Reducing illegal waste disposal is a key goal in the Victorian Government's [Getting Full Value - The Victorian Waste and Resource Recovery Policy](#). EPA's role in meeting this key goal is through compliance and enforcement activities, behaviour change programs and sharing our knowledge and intelligence with government partners and the industry.



Illegal Dumping Strike Force program

The Illegal Dumping Strike Force (IDSF) is a continuing program of strategic identification, investigation and compliance and enforcement activities applied to the systemic and large-scale dumping of industrial wastes that is carried out to avoid the costs of legal disposal of these wastes.

Due to the systemic nature of illegal dumping across jurisdictions and the close-knit relationships within the waste industry, the program is developing relationships with other co-regulatory authorities such as Victorian WorkCover Authority (VWA), the Victorian Police, the Australian Tax Office and NSW, SA and QLD environment authorities. Through these relationships and our informants, EPA is building an intelligence base to identify patterns of organised, illegal activity and identifying priority targets for enforcement action.

4.1.3 Landfills

Poorly managed landfill sites may pose an unacceptable risk to public health and the environment through the contamination of land, groundwater and surface water, and the emission of landfill gas. As many of these risks are below ground they can be difficult to identify and take time to materialise. The community can also be impacted by odour from landfills.

To address these risks and protect the environment, specific environmental objectives and compliance standards for landfills are set out in EPA's best practice environmental management publication ***Siting, design, operation and rehabilitation of landfills*** (the Landfill BPEM) (EPA publication 788.1). Landfill operators must meet the objectives and required outcomes of the Landfill BPEM to protect the environment and comply with Victorian Government policy.

Landfills serving more than 5,000 people are required to hold a licence from EPA to operate. Landfills serving smaller populations, that are exempt from licensing, can also pose a risk to the environment and must be managed to prevent impacts. The ***Landfills exempt from licensing guidelines*** (EPA Publication 1563) released early in 2014 aims to ensure such facilities in Victoria are well sited, well built and operated at the highest standards to deliver the environmental and public health benefits that Victorians expect. In 2014-15 EPA will be inspecting landfills exempt

from licensing to assess performance against the guidelines, as well as assessing current and closed exempt landfill sites to determine how risks are being managed.

4.1.4 Organic waste

Organic material makes up more than 60 per cent of all waste disposed of in Victorian landfills. There are state government initiatives to divert organic material from landfills but if not properly managed, organic material can cause environmental harm by polluting surface and ground water and cause odour impacts on local communities.

In 2014-15 EPA will continue to contribute to ***Getting Full Value - The Victorian Waste and Resource Recovery Policy*** by releasing updated compost processing guidelines. We will also work with composting businesses to benchmark the industry's current practices and support the industry's transformation to higher operational and performance standards. EPA's focus will not be exclusively on licensed composting operators; there are a growing number of small un-licensed composters that may be accepting volumes and/or types of organic materials which may trigger the need for an EPA statutory approval, such as a works approval. These sites will also be investigated.

4.1.5 Residential encroachment on critical industries

Increasing urban development in Victoria is leading to residential areas being built closer to existing industry. With Melbourne's population estimated to increase to be 7.7 million by 2051, EPA recognises that residential development will need to increase. However, residential encroachment and intensification near critical industrial facilities can impact on the health and amenity of future residents as well as the viability of these industries.

Through this program EPA is working with key stakeholders in government, the community and industry to ensure that:

- industries are upgraded or located so they will have minimum offsite impact
- the health and amenity of new residents are protected from nearby industry through appropriate buffers
- the viability of key industries is not threatened
- strategic planning recognises and manages encroachment.

Land use planning

EPA's planning strategy aims to prevent future environmental impacts through good land use planning.

EPA recognises that good planning is one of the most effective ways of preventing environmental impacts. For example, planning can ensure there is an appropriate distance between incompatible uses and that necessary environmental measures are imposed via planning permit conditions, thereby reducing the need for future compliance work. In 2014-15 EPA will assess high-risk planning permit applications and contribute to strategic planning decisions, ensure that environmental considerations are given enough weight within the planning system and collaborate with planning authorities to achieve strategic objectives.

4.1.6 Stormwater contamination in urban areas

Urban stormwater is the biggest contributor to waterway degradation. Large volumes of run-off and highly contaminated water can enter Port Phillip Bay and make it unsafe for aquatic life and human enjoyment. Contaminants and inappropriate flows come from sewerage overflows, illegal connections and discharges, failing infrastructure and rainwater washing wastes from roads, footpaths and other impermeable surfaces into waterways. EPA aims to improve waterway health by minimising contaminants from both point and dispersed sources.

EPA has identified metals and hydrocarbons as key contaminants impacting the urban waterways of Melbourne, and traced the source, primarily, back to industrial parks. This has driven the need for targeted activity to tackle these sources.

In 2014-15 EPA will continue to focus on highly impacted areas and use our refined understanding of key sources of metals and hydrocarbons to direct our activity to tackle industrial areas and high-risk industries.

Through our work in 2013-14, EPA made a short-term impact in the electroplating industry. The challenge is to use this momentum to create long-term, sustainable change. In 2014-15 we will implement a program to respond to the metal pollution resulting from poor storage and handling of chemicals and wastes by the electroplating industry.

4.2 Regional strategic projects

Regional strategic projects address compliance problems that are specific to a local area.

These projects are largely focused on environmental problems that can be managed and resolved using regional resources. They range from high-risk and habitually non-compliant sites, to region or industry-specific problems. In 2014-15 regional strategic programs will prioritise problems associated with EPA's top six focus areas to support their objectives. In addition, they will address high-risk short-term environmental issues that emerge through the year as well as continue to resolve regional issues previously identified.

Below is a summary of the ongoing strategic projects that EPA will be addressing in 2014-15. Other strategic projects will be developed during the year, as needed. For more information about what EPA will be focusing on, what you can do to prepare for an EPA visit, and additional guidance material, visit the Annual Compliance Plan 2014-15 in the Compliance and Enforcement section of [EPA's website](#).

4.2.1 Dairy effluent management

Dairy farms can impact local waterways and downstream water users if dairy effluent is poorly managed. Effluent management is the responsibility of the landholder and untreated and unmanaged discharges to waterways are illegal. EPA's dairy effluent management initiative is in the second year of a five-year program to identify and act on effluent management issues. Through this program, EPA is working with Dairy Food Safety Victoria to ensure food safety auditors inspecting dairy farms across the state report issues relating to non-compliant effluent management. EPA will use this data and other intelligence to identify high-risk sites for inspection.

4.2.2 Targeting pollution hotspots

EPA has committed to targeting pollution hotspots to improve compliance by industry, land developers and dealing with other sources of pollution in waterways through [A Cleaner Yarra River and Port Phillip Bay Action Plan](#). Poor business practices, such as poor bunding and chemical storage, and improper waste disposal and stormwater management, can pollute our waterways.

EPA is working with Melbourne Water and local councils to identify pollution hotspots, gather and analyse evidence, identify alleged sources, and when required, take compliance action. This program supports the statewide stormwater contamination project.

5. Compliance maintenance activities

Compliance maintenance activities include the assessment of sites and instruments known to EPA, where a statutory permission, approval, exemption or direction has been provided.

EPA issues statutory instruments, such as licences, to duty holders to ensure that their operations do not harm the environment. We monitor compliance with these instruments to ensure that risks to the environment are being managed appropriately, while maintaining EPA's regulatory oversight and protecting the integrity of the statutory system. This also ensures a level playing field for operators who do the right thing.

Where appropriate, EPA prioritises activities and sites on risk. Other activities and sites may warrant assessment regardless of risk due to statutory obligations. A small portion of assessments will be conducted on a random sample of sites to ensure that the statutory process has been adhered to, or to increase EPA's regulatory presence.

Below is a summary of the statutory instruments that EPA will be monitoring in 2014-15. For more information about what EPA will be focusing on, what you can do to prepare for an EPA visit, and additional guidance material, visit the Annual Compliance Plan 2014-15 in the Compliance and Enforcement section of [EPA's website](#).

5.1 Licences

EPA issues licences to sites that pose an environmental risk due to the nature of their activities. These sites are required by law to obtain permission for those activities and must operate within the limits of their licence and comply with licence conditions. EPA licences allow businesses to discharge wastes into the environment under strict conditions and to manage prescribed industrial wastes.

In 2012-13 EPA commenced a program to inspect every licensed site by the end of 2014-15. During these inspections, EPA authorised officers checked compliance against each sites' licence and gathered specific data to support the development of EPA's [Licensed Operator Risk Assessment](#) (LORA) model. The LORA model emphasises a licence holder's ability to identify and control site risks. It uses multiple sets of data, including those gathered on site during a licence inspection, to calculate a unique risk score for each site. This risk score indicates the risk of harm to the environment and the risk of non-compliance

and will allow EPA to set the frequency of inspections that is proportionate to the risks posed at each site.

In 2014-15 EPA's authorised officers will visit the licensed sites that have not been inspected in the last two years, assess their performance against their licence requirements and gather data to support the LORA model. They may also revisit sites to get updated or additional data. Officers will also focus on management practices and validating licence holders' annual performance statement (APS) submissions. These inspections may be unannounced.



5.2 Annual performance statements

The annual performance statement (APS) is the way licence holders publicly report their environmental performance. The APS is a public declaration of the licence holder's performance against licence conditions in the previous financial year. It must be signed by the most senior executive in the company. Significant penalties, including jail terms, exist for executives providing false or misleading information to EPA.

APSs are submitted at the end of September each year. All submitted APSs undergo a preliminary verification check to ensure that data is complete. EPA compares available information with what has been attested by the licence holder's senior executive to indicate the likelihood that an APS contains false or misleading information. Statements that have a higher likelihood of containing false or misleading information will be selected for targeted detailed assessments, along with a selection of statements containing a lower likelihood.

EPA uses information from APSs as a source of intelligence leading to targeted licence inspections. This may occur on an individual level (such as repeated non-compliances that need to be remedied) or on a broader level (such as targeting action in certain sectors or on specific conditions). EPA authorised officers may also assess some or all of a site's APS declarations during a standard licence compliance inspection, particularly with regard to a site's monitoring program.

5.3 Major industrial facilities

In 2014-15 EPA will inspect a number of major industry sites, both licensed and unlicensed, across a range of industries. Major industries are those that generate large volumes of waste, discharge high volumes of emissions or treated effluent, store large volumes of chemicals or hazardous materials or are large energy generators. This will include some of the large manufacturers that are ceasing or reducing their operations in Victoria and have the potential to leave considerable environmental legacies from past operations.

During these inspections, EPA will have a strong focus on the environmental management systems that underpin operations, the efficacy of environmental monitoring programs, and the performance and adequacy of environmental controls.

5.4 Contaminated environments (land and groundwater) - Priority Sites Register

EPA's 5 Year Plan has a specific focus on the environmental and economic problems of contaminated land and groundwater. Sites that have been contaminated by past industrial use pose a risk to the environment and the public, and contaminated sites often "tie up" potentially productive land in metropolitan and regional centres across Victoria.

EPA may require duty holders to clean-up sites through a cleanup notice or pollution abatement notice. These notices remain in place until the contamination is cleaned up or managed to an acceptable standard. Sites that are subject to a remedial notice for land and/or groundwater contamination are included on our public [Priority Sites Register](#) (PSR) for the duration that the site has a notice.

Through ongoing training, we are increasing the number of EPA field staff involved in managing the risks of contaminated sites. We will inspect a number of sites listed on the Priority Sites Register in 2014-15 and initiate follow-up action where non-compliance with our statutory instruments is identified. As part of all inspections, we will be gathering information that will be used to assess each site's potential risk to human health and the environment. This will allow us to focus on the sites that pose the greatest risk.

5.5 Post-closure landfill management

If managed poorly, landfills can pose a significant risk to the environment for decades after they close. EPA has a particular focus on the rehabilitation and ongoing aftercare management of closed landfills. In 2012-13 EPA initiated a coordinated program to look at the management of closed landfills that were licensed or regulated under a notice. 2014-15 is the third year of a four-year staged program of reviewing the status of closed landfills across the state. The program provides the transition from an operating licence to the ongoing management required for a closed landfill. Closed landfills are managed through a post closure pollution abatement notice (PC PAN).

In 2014-15, EPA will inspect and review the performance of 26 closed landfills across the state which were previously licensed or have a remedial notice. EPA will also continue to inspect other closed landfills, depending on risk assessments, and where notice compliance due dates fall within 2014-15. Some inspections will start the process towards issuing a reformed PC PAN that will ensure aftercare management is proportionate to the risks posed by the site.

5.6 Statutory approvals and permissions

Certain high-risk commercial or industrial activities are required to seek approval from EPA prior to building new equipment or facilities, discharging waste to the environment (even in emergency situations) or handling certain chemicals or wastes. Works approvals and research, development and demonstration approvals (RD&Ds) are examples of the types of permissions that are key preventative mechanisms through which EPA protects the Victorian environment.

In 2014-15 EPA will continue to conduct both desktop assessments and inspections across a range of approvals to ensure they are complied with. In particular, we will focus on works approvals, RD&D approvals, emergency or commissioning approvals and works approval exemptions. Compliance with approval conditions will be assessed either during the approval validity period or upon expiry, according to reporting requirements.

High-risk emergency discharge approvals will also be inspected. EPA is reviewing its procedures for the issue emergency discharge approvals and duty holders should ensure that they consider whether the need to discharge waste was foreseeable before they apply.

5.7 Regulatory programs

EPA coordinates a number of national and state programs directed at businesses and individuals to ensure wastes are appropriately managed and do not impact on the environment. EPA will assess compliance with these programs, require identified non-compliances to be fixed and, where appropriate, collect evidence to take enforcement action.

National Pollutant Inventory (NPI): The NPI is a national program requiring many businesses to report their emissions of a range of substances. Ten sites will be selected for an onsite audit of their NPI reporting to verify the integrity of their data.

Waste transport: Hazardous waste must be managed in accordance with Victorian regulations and there is a responsibility on waste producers, transporters and receivers to meet their obligations. EPA will carry out both scheduled and unannounced inspections of permitted vehicles (including roadside operations) with a particular focus on non-compliance with waste transport requirements.

Landfill levy: On behalf of the Victorian Government, licensed landfills in Victoria must collect and pay to EPA a levy on every tonne of waste disposed at the premises. Twenty landfill levy statements will be audited to verify the accuracy of the declared leviable waste quantities and recycling rebate claims.

Financial assurances: A financial assurance is a security that has to be submitted for certain types of activities. During 2014-15 EPA will implement updated financial assurance requirements. EPA will focus on obtaining adequate financial assurances on the sites that are required to maintain one. As part of this implementation process we will focus on compliance with waste storage requirements as well as reviewing contamination risks posed by sites. Inspections may be targeted to assess these issues.

Ballast water management: All ships visiting Victorian ports are required to submit ballast water declarations and obtain EPA approval for any discharge of domestic ballast. EPA assesses all submitted reports and will take enforcement action where reports have not been submitted on time. Accredited vessels may be subject to an inspection each year. In addition, 10 per cent of the estimated 3,000 non-accredited ships visiting Victorian ports will be inspected.

Motor vehicle emissions: The owners of vehicles that have been identified by EPA officers or Victoria Police as being too noisy or smoky are issued with a notice requiring them to have their vehicle tested at an EPA-approved testing facility. Failure to comply with these requirements may result in EPA imposing registration suspensions on the vehicles. EPA will be involved in at least 12 roadside operations with Victoria Police to target noisy and smoky vehicles.

5.8 Compliance with remedial notices

A remedial notice is a written statutory direction that requires, by law, that a notice recipient undertake works or activities as detailed in the notice. Notices are used to remedy non-compliances or likely non-compliances with the EP Act. They do not expire and remain legally valid until revoked by EPA.

EPA will ensure the timely follow up to check if notice conditions have been complied with: whether the risk has been removed, the requirements of the clean up are met, and the required activities are conducted or necessary controls installed.

Significant penalties exist for notice recipients who have not complied. In these cases EPA will consider issuing sanctions and also require that the original non-compliance be fixed, in accordance with EPA's [Compliance and Enforcement Policy](#) (EPA publication 1388). If the issue is serious EPA may issue a notice to cease operating until the risk or harm is fixed.

6. Incident response activities

Incident response inspections are reactive inspections focused on minimising harm from pollution events, identifying the source of the pollution and, if warranted, taking enforcement action.

Incident response activities are inspections and other assessments that aim to address environmental pollution identified through reports of pollution made by the public, emergency incident notifications, duty holder notifications, co-regulator reports or other information sources. EPA receives pollution reports and notifications on the EPA pollution hotline **1300 EPA VIC (1300 372 842)**.

EPA conducts a risk-based assessment of reports to ensure that we respond appropriately. The assessment considers

the risk to the environment and human health, and the likelihood EPA officers will find the pollution, detect the source and address the issue. Based on the outcome of this assessment, EPA may conduct an inspection, work with co-regulators to address the issue, or take no immediate action but log the report to contribute to future intelligence. For more information about reporting pollution and this assessment, visit the [Get Involved](#) section on EPA's website.

During a response inspection, EPA authorised officers will determine the source of the pollution by tracing the discharge back to a site. If the problem cannot be resolved immediately by the site operator, officers will issue a notice to fix the problem. Officers may also collect evidence to issue a fine or to prosecute.

REPORTING POLLUTION AND ENVIRONMENTAL HAZARDS

The Victorian community has a vital role in protecting the environment. EPA relies on the community to report incidents of pollution, environmental hazards or other activities potentially harmful to the environment. As discussed in the Incident response activities section of this plan, these reports are prioritised to ensure we address the highest risk reports quickly.

If you observe pollution, dumping of industrial waste or an activity or issue that presents a hazard to the environment, please call **1300 EPA VIC (1300 372 842)** immediately. More detail included in your report will help EPA correctly prioritise and respond to the pollution event.

The [Reporting pollution](#) section of EPA's website provides further information on what matters should be reported to EPA. **1300 EPA VIC (1300 372 842)**

7. What you can do to prepare for a visit from EPA

EPA conducts both announced and unannounced inspections. All businesses are responsible for operating in accordance with the conditions of their licence and/or within the law.

If you hold an EPA licence, have a statutory approval or notice relating to your business, manage or transport any kind of wastes on or off your site, are operating within an industry identified as one of the strategic priorities for 2014-15, or conduct operations that create potential amenity impacts such as odour and noise, you may receive a visit from EPA.

Below is a summary of the types of actions you can take to prepare for a visit from EPA. For specific information visit the Annual Compliance Plan 2014-15 in the Compliance and Enforcement section of [EPA's website](#).

Be familiar with your responsibilities

1. Make sure you are familiar with the conditions of your licence, notice, approvals and the law.
2. Be familiar with EPA guidelines that relate to your industry or to relevant site operations.
3. Be aware of any approvals that your business may require. For example expanding operations or upgrading equipment may require a works approval; increasing the volume of waste generated might trigger the licence threshold. If in doubt call EPA on 1300 EPA VIC (1300 372 842).

Put in place environmental monitoring and management systems

4. Identify risks posed to the environment from site operations, put suitable controls in place to manage them and document these controls. If necessary seek professional advice.
5. Ensure you have a documented monitoring program in place that allows you and EPA to know if you are not complying with your licence, approval or the law. This can include regular sampling programs, leak detection mechanisms, or a program to regularly assess amenity impacts to surrounding communities. If necessary seek professional advice.

6. Have a system in place to know if and when your site operations has amenity impacts on the surrounding community. Have a process in place to manage any issues quickly.
7. Closely monitor any storage or liquid transportation systems that are below ground to avoid leaks going undetected and impacting land or groundwater.
8. Make sure that you keep all monitoring records on site.

Maintain good practices

9. Store, manage and dispose of waste properly so that it does not impact the environment. Ensure that any subcontractors you are using for disposing of waste are operating within the law and associated guidelines.
10. Ensure that any stormwater drains are clear of debris and that no waste from your site enters the stormwater system.

Communicate with EPA

11. If you think you might be non-compliant with your licence, approval or the law, or at risk of being non-compliant with a remedial notice, immediately notify EPA on 1300 EPA VIC (1300 372 842). EPA will consider any notifications when considering taking further action or determining if a sanction should be pursued.
12. If you are aware of operators in your industry who are not complying with the law, or are causing environmental harm, call 1300 EPA VIC (1300 372 842) as soon as possible, with as much detail as possible.



8. Annual Compliance Plan performance reporting

EPA sets public targets within the Annual Compliance Plan and reports semi-annually on how we are performing against them. Key targets are summarised in the table below. Reports can be found on EPA's website (www.epa.vic.gov.au).

For information on targets relating to the broader activities EPA is undertaking in 2014-15, see EPA's [Annual Plan 2014-15](#) on our website.

We will monitor our performance against the Annual Compliance Plan throughout the year so that we know we are meeting the targets set out in this plan. We will assess performance monthly and in doing so, identify opportunities to improve the way we perform our regulatory role.

8.1 Annual Compliance Plan performance targets

Compliance area	Activity	2014-15 targets and goals
Compliance Maintenance	Licences	100 per cent of licensed sites will have received a licence compliance inspection in the last three years
Compliance Maintenance	Annual performance statements (APSS)	<ol style="list-style-type: none"> 100 per cent of all APSS reviewed and compared to information held by EPA 30 detailed site-based assessments of APSS
Compliance Maintenance	Regulatory programs	60 targeted inspections resulting from intelligence from waste transport certificates, annual performance statements, National Pollutant Inventory (NPI), landfill levies or financial assurances
Pollution Response	Pollution and emergency response	<ol style="list-style-type: none"> 95 per cent of incidents requiring immediate attendance (high environmental risk/likelihood of detection and mitigation) inspected 90 per cent of incidents requiring planned attendance (moderate environmental risk/likelihood of detection and mitigation) inspected
Compliance Maintenance	Statutory approvals and permissions	<ol style="list-style-type: none"> All works approvals, research, development and demonstration approvals (RD&Ds) and exemptions assessed for works complete upon duty holder notification 90 per cent of high-risk 30A emergency discharge approvals inspected
Compliance Maintenance	Closed landfills (previously licensed or with a notice)	26 closed landfills inspected
Compliance Maintenance	Notice follow-up	90 per cent of notices complied with by the due date or escalated in line with the EPA's Compliance and Enforcement Policy (EPA publication 1388)
Compliance Maintenance	Inspections	100 per cent of inspected sites that have an identified operator receive an inspection report

In 2014-15 EPA will report our performance against the Annual Compliance Plan targets semi-annually, instead of quarterly as we have done to date. This will allow us to report more substantive progress against our strategic projects. The Annual Compliance Plan performance reports will be published in the Compliance and Enforcement section of [EPA's website](#).

This publication can be found online in
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