# GR_TM_Logo

|  |  |
| --- | --- |
| OPERATIONAL PROCEDUREECO-ENV-QP.010 | |
| POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN | |
| Process Owner: | General Manager: Operations |
| Performed by: | All staff |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Revision Status | | | | | | |
| **Issue/Rev.** | **Date** | **Revision Description** | **By** | **Checked** | **Checked** | **Approved** |
| A | 31.8.12 | Initial Version | RW |  |  | NL |
| B | 11.3.13 | Update fire & rescue phone number | GT |  |  | NL |
| C | 16/8/13 | Update following Scenario Training: Control Room copy included | GT |  |  | NL |
| D | 22/4/15 | Update following Scenario Training: Control Room copy included | GT | CB |  | NL |

TABLE OF CONTENTS

[1. Purpose And Scope](#_Toc334449418)

[2. Definitions](#_Toc334449419)

[3. What to do if a pollution incident occurs](#_Toc334449420)

[4. Legal Requirements](#_Toc334449421)

[5. Site Overview](#_Toc334449422)

[6. Pollution incident Notification PROTOCOL](#_Toc334449423)

[7. Community Engagement Protocol](#_Toc334449424)

[8. Site Response](#_Toc334449425)

[9. Hazards](#_Toc334449426)

[10. Potential Pollutants](#_Toc334449427)

[11. Safety Equipment](#_Toc334449428)

[12. Staff Training](#_Toc334449429)

[13. Testing the Plan](#_Toc334449430)

[14. Plan Availability](#_Toc334449431)

[15. References](#_Toc334449432)

[16. Change History](#_Toc334449433)

### Purpose And Scope

This pollution incident response management plan (PIRMP) has been prepared for Eastern Creek Operations (ECO) for the UR-3R Facility at Eastern Creek.

The PIRMP sets out the procedure to be followed in the event of a pollution incident at the site. The objectives of the PIRMP are to:

* Ensure comprehensive and timely communication about a pollution incident to personnel at the site, the Environment Protection Authority (EPA), other relevant authorities, and people in the community who may be affected by the impacts of the pollution incident;
* Minimise and control the risk of a pollution incident at the site by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
* Ensure that the PIRMP 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.

### Definitions

|  |  |
| --- | --- |
| PIRMP | Pollution incident response management plan |
| ECO | Eastern Creek Operations |
| GRA | Global Renewables Australia (ECO’s parent company) |

### What to do if a pollution incident occurs

A “Pollution Incident” is an incident that causes or threatens material harm to the environment (see Section 4).

*Take immediate action to ensure the safety of people at the site*

*(if not safe - don’t become another casualty)*

If the incident presents an immediate threat to human health or property:

Phone (0) 000 for emergency assistance

If the incident does not require an initial combat agency, or once the 000 call has been made:

*Notify the Chief Warden (the most senior ECO employee on site) of the incident and all relevant information – see Emergency Contact posters.*

The Chief Warden must immediately notify all the relevant authorities listed below, in the order listed:

|  |  |
| --- | --- |
| **Contact** | **Phone Number** |
| The EPA Environment Line | (0) 131 555 |
| The Ministry of Health via the Parramatta office of the Public Health Unit | (0) 9840 3603  After hours (0) 9845 5555 - Westmead Hospital - ask for the Public Health Officer on call) |
| The WorkCover Authority | (0) 13 10 50 |
| Blacktown City Council | (0) 9839 6000 or  (0) 1300 133 491 |
| Fire and Rescue NSW | (0)1300 729 579 |

|  |  |
| --- | --- |
| **Reason** | **Contact** |
| The incident involves electricity | Endeavour Energy: (0) 131 003. |
| The incident threatens the large water pipes to the south of the UR-3R Facility | Sydney Catchment Authority: (0) 1800 061 069. |
| The incident threatens the underground water pipes to the east of the UR-3R Facility | Sydney Water: (0) 13 20 90. |
| The incident affects, or potentially affects the area to the south of the UR-3R Facility | Fairfield City Council: (0) 9725 0222  (8:30 am to 5 pm, automatically diverts to after-hours emergency service). |

Following notification, follow the emergency procedures in the Summary Emergency Plan and the relevant Emergency Response Procedure.

Other authorities may need to be contacted depending on the nature of the incident, such as:

### Legal Requirements

#### Legislative requirement for the Plan

The UR-3R Facility operates under Environment Protection Licence (EPL) 11798. In accordance with the Protection of the Environment Operations Act 1997 (POEO Act), all EPL holders are required to prepare and implement a PIRMP for each licenced site. Part 5.7A, section 153A of the POEO Act states:

**Duty of licence holder to prepare pollution incident response management plan.**

The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.

The PIRMP must include the information detailed in the POEO Act and content specified in the POEO (General) Regulation. This PIRMP has been prepared in accordance with the POEO Act, the Regulation, and the EPA guidelines “Preparation of pollution incident response management plans”, 2012. A checklist of legislative requirements and where those requirements have been met in this PIRMP is provided in Appendix A.

Offences have been introduced under the legislation for not preparing a PIRMP. Offences are also in place for not keeping the PIRMP at the premises to which it relates, not testing the PIRMP in accordance with the Regulation, and not implementing the PIRMP when an incident occurs.

#### What is a Pollution Incident?

In accordance with the POEO Act (section 153F), if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement the PIRMP.

‘Pollution Incident ‘is defined in the dictionary of the POEO Act as:

A 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 set of circumstances involving only the emission of any noise.

‘Material Harm’ is defined in section 147 of the POEO Act. Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.

147   Meaning of material harm to the environment

(1)  For the purposes of this Part:

(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 the 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.

(2)  For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

#### Immediate notification

EPL licensees, and anyone carrying on an activity or occupying a premises, who become aware of a pollution incident, are required to report the pollution incident **immediately** (under section 148 of the POEO Act).

‘Immediate’ means licensees need to report pollution incidents promptly and without delay. There is a $2 million maximum penalty for failure to notify of a pollution incident in accordance with the requirements of the POEO Act.

The requirement to notify applies to:

* All holders of EPLs; and
* Persons that undertake activities resulting in a pollution incident.

Further information regarding notification and who to notify is specified in Section 0 of this PIRMP.

### Site Overview

The UR-3R Facility is located on a 5 ha site in the south-western corner of the Eastern Creek Waste & Recycling Centre. The UR-3R process recovers recyclables and organic material from Municipal Solid Waste (MSW).

Figure 1 in Appendix B shows the site and surrounds.

Note that the border between Blacktown City Council and Fairfield City Council is immediately to the south of the UR-3R Facility.

### Pollution incident Notification PROTOCOL

#### When is notification required?

If a pollution incident occurs in the course of an activity that causes or threatens material harm to the environment there is a duty to notify. A definition of pollution incident and an explanation of material harm are provided in Section 4.2.

The duty to notify does not apply to a pollution incident involving only the emission of an odour, and does not include an incident or set of circumstances involving only the emission of noise.

You are not required to notify if the incident is an ordinary result of action required to be taken to comply with the EPL at the site, an environment protection notice or other requirement of the POEO Act.

#### Who has a duty to notify?

Under the POEO Act, the following people have a duty to notify of the pollution incident:

* The person carrying on the activity (including casual or shift workers, or contractors);
* An employee or agent carrying on the activity;
* An employer carrying on the activity; and
* The occupier of the premises where the incident occurs.

Notification must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident (in accordance with section 148, POEO Act).

Penalties can apply if there is a failure to notify ($2,000,000 for a corporation and $500,000 for an individual). A person must notify even though the notification might incriminate the person.

#### Who do you notify?

Firstly, call (0 for outside line, then) 000 if the incident presents an immediate threat to human health or property. 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 require an initial combat agency, or once the 000 call has been made, you must immediately notify the Chief Warden of the incident and all relevant information about it. The Chief Warden is the most senior ECO employee on site at the time of the incident.(See Section 6 Management Plan)

Emergency contact details for ECO management are found on the Emergency Contact posters in various locations at the UR-3R Facilty.

The Chief Warden will contact other management and directors if required.

The Chief Warden is:

* Responsible for activating the PIRMP;
* Authorised to notify relevant authorities as advised below; and
* Responsible for managing the response to a pollution incident.

Upon receiving notification, the Chief Warden must determine if the event is a pollution incident (refer to section 4.2). If it is a pollution incident, the Chief Warden must then immediately (that is, promptly and without delay), provide notification of the pollution incident to all the authorities identified in Table 1, in the order as listed.

Table Notification to Relevant Authorities (first dial 0 for an outside line)

|  |  |
| --- | --- |
| **Contact** | **Phone Number** |
| 1. The EPA Environment Line | 131 555 |
| 1. The Ministry of Health via the Parramatta office of the Public Health Unit | Ph: 02 9840 3603 (after hours call 02 9845 5555 - Westmead Hospital - ask for the Public Health Officer on call) |
| 1. The WorkCover Authority | 13 10 50 |
| 1. Blacktown City Council | Ph: (02) 9839 6000 or 1300 133 491 |
| 1. Fire and Rescue NSW | 1300 729 579 |

Whenever an incident notification is made, **all five** relevant authorities must be contacted. For example:

* If you initially rang Fire and Rescue on 000 due to an immediate threat to life and property, you must still contact the other four authorities; or
* If the incident did not require an initial combat agency, you must still notify all of the response authorities (including Fire and Rescue) in the order listed in Table 1.

You do not have to notify if you know that all relevant authorities are already aware of the incident (section 151 POEO Act).

If, at the time of making the notification, you believe that some of these authorities do not need to attend the incident, you may provide that advice. However, you must still provide all the information you have regarding the incident to each authority. It is the responsibility of each authority to decide whether they need to attend the incident.

Where authorities decide not to attend, the incident notification enables each authority to respond to enquiries about the incident and provides them with initial information in the event that the incident escalates or their involvement in managing the incident is required at some later stage.

ECO may also need to make the following notifications depending on the nature of the incident:

* If the incident involves electricity, contact Endeavour Energy: 131 003.
* If the incident threatens the large water pipes to the south of the UR-3R Facility, contact the Sydney Catchment Authority: 1800 061 069.
* If the incident threatens the underground water pipes to the east of the UR-3R Facility, contact Sydney Water: 13 20 90.
* If the incident affects, or potentially affects the area to the south of the UR-3R Facility, contact Fairfield City Council: 02 9725 0222 (8:30 am to 5 pm, automatically diverts to after-hours emergency service).

#### What information must you provide?

Sufficient detail of the incident must be reported to the EPA to enable appropriate follow-up action. The relevant information required includes:

* The time, date, nature, duration and location of the incident;
* The location of the place where pollution is occurring or is likely to occur;
* The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
* The circumstances in which the incident occurred (including the cause of the incident, if known); and
* The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

Any information that is not known when the incident is notified must be provided immediately once it becomes known.

#### Coordination with authorities

In the event of an immediate threat to life and property, the incident will be coordinated by emergency services. In such a case, when external emergency services arrive on site their Senior Emergency Services Officer (usually from the Fire Brigade) will take on the role of Emergency Coordinator. ECO will act under instruction from emergency services and take any action as directed to combat pollution caused by the incident.

The ECO person through whom all communications are to be made to coordinate with authorities in such a case is the ECO Chief Warden.

### Community Engagement Protocol

#### Wider notification

The EPA can formally direct ECO to notify others. This direction will require ECO to contact commercial, industrial and residential neighbours to inform them of the circumstances of the incident and what action is being taken in response to it. It will be an offence not to comply with such a direction.

The EPA may advise ECO of the extent of notification required. If not, ECO would determine the extent of who to contact based on the nature of the pollution incident and the conditions at the time (for example, the type of pollutant, prevailing winds, magnitude of incident, and possible impacts).

#### Communication mechanisms

In the event that the pollution incident is being coordinated by emergency services, communications would be under the control of emergency services. Emergency services are able to send out SMS messages to defined catchment areas to alert and advise the community if required. ECO would work with emergency services to provide communications assistance and support, including direct doorknocks if they were required.

If communication is not coordinated by emergency services, notification to the owners or occupiers of premises in the vicinity of the UR-3R Facility would be coordinated by ECO’s Chief Warden.

A list of neighbours within the vicinity and their telephone numbers is provided in the Summary Emergency Plan and the Emergency Contact posters.

ECO has a variety of mechanisms available for providing early warnings and regular updates to neighbours and the community. The mechanisms to be employed would depend on the nature of the incident and include:

* Telephone calls and SMS messages to immediate neighbours;
* Media releases to the broader community (radio and television);
* Incident notification on the ECO website;
* Reports to regular community advisory committee meetings;
* Emails to community representatives; and
* Doorknocking of affected neighbours and community members.

The communication response to be used in the event of a pollution incident would depend on the circumstances of the event, and any direction that may be provided by the EPA.

#### Information to be provided

In the event of a pollution incident, communication to the community would include specific information to minimise the risk of harm. The information to be provided would be dependent on the nature and circumstances of the event.

### Site Response

This section of the PIRMP provides a description of the action that would be taken immediately after a pollution incident has been notified.

#### Minimise risk to persons on premises

The first response is always to ensure that risk to people at the site is minimised.

ECO has 70 personnel who are involved in management and administration, operations and maintenance, laboratory and technical work, and process control. At any given time, the site could potentially also accommodate truck drivers, specialist contractors in equipment operation or maintenance, and visitors.

#### Reduce or Control Pollution Incident

Only if it is safe to do so should action be taken to reduce or control the pollution incident. Equipment is available on site to facilitate this action.

#### Other Emergency Management Documents/Plans

Any emergency incident at the site shall be dealt with according to the ECO Emergency Management Plan, Summary Emergency Plan, and Emergency Response Procedures.

These documents specify the arrangements for minimising the risk of harm to both people and the environment during an emergency at the UR-3R Facility. The action to be taken would depend on the type of emergency and may include:

* Activating the warning alarm/s;
* Evacuating personnel to evacuation assembly point;
* Emergency shutdown; and
* Specific emergency response (e.g. spill control).

The Emergency Management Plan provides overall guidance and refers to specific workplace procedures depending on the incident that has occurred. Which procedure to be followed will depend on the nature of the incident and will be determined by the supervisors and managers on site at the time of the incident.

The Summary Emergency Plan is a single page document which provides information on:

* Roles during an emergency;
* Emergency communication including neighbour contact details;
* Emergency response and control; and
* Clean-up following an emergency.

The Emergency Response Procedures cover individual emergency scenarios. Some ERPs relevant to pollution incidents are:

* On-Site Fire Emergency;
* On-Site Chemical Spill;
* Vehicle Liquid Spills (Vehicle Hydraulic/Fuel/Oil Systems); and
* Vehicle Spillage of Product.

The procedures include arrangements for stopping-work, deployment of spill containment equipment, and clean up action.

### Hazards

This section of the PIRMP identifies the main potential hazards to human health or the environment associated with activities at the UR-3R Facility. Table 2 identifies:

* The main potential hazards;
* The likelihood of these hazards occurring;
* The conditions or events that could, or would, increase the likelihood of hazards occurring; and
* Pre-emptive actions.

The likelihood of hazards occurring has been reduced through the implementation of pre-emptive actions. Pre-emptive actions are undertaken to minimise or prevent any risk of harm to human health or the environment arising out of site activities. Pre-emptive actions listed in Table 2 are not exhaustive of all pre-emptive measures taken at the site.

**Table 2 Main Hazards and Pre-Emptive Actions**

| Main Hazards | Likelihood of hazards occurring | Conditions or events that could increase the likelihood of the hazard occurring | Pre-emptive Actions |
| --- | --- | --- | --- |
| Fire | Low | * Poor housekeeping and maintenance * Fuel or oil leak from vehicle or equipment damage * Vandalism * Equipment/process failure (e.g. baler fire) * Substation electrical fault | * Control of ignition sources * Routine and periodic impact cleaning of site * No smoking policy onsite * Regular maintenance of site equipment * Fire detection and control systems |
| Oil/Fuel Spill | Low | * Poor maintenance of mobile equipment/transport leading to line breakage, drips and spills * Vehicle accident * Poor oil storage * Leak from transformers at substation * Diesel tank rupture/leak | * Regular testing and maintenance of site equipment * Pre-start checks on machinery * Bunding of diesel tanks and oil storage drums * Substation transformers located in a contained area * Regular inspection of substation transformers * Vehicles are required to comply with the site speed limit * Whole site first flush system acts as a backup bund |
| Dust from compost | Low | * Spillage of waste or products * Loading/unloading in adverse weather conditions * Poor loading/unloading practices * Vehicle accident | * The site is maintained in a condition which minimises or prevents the emission of dust from the premises * All processing occurs inside buildings; only final composted products are stored outside * Air extraction system installed * Externally stored material is wet during dry weather * Sealed areas are regularly cleaned to reduce dust potential |
| Product or waste spillage | Low | * Vehicle mechanical breakdown or accident | * All waste and majority of products are tipped/loaded inside buildings * Composted products are loaded in bunded area * Vehicles are required to comply with the site speed limit * Maintenance and cleaning of vehicles and mobile plant * Whole site first flush system acts as a backup bund |
| Chemical/pollutant release from waste | Low | * Inappropriate waste received at UR-3R Facility | * Only household waste (MSW) is received at the UR-3R Facility. * Waste is screened at delivery and initial processing. * Waste is processed in enclosed buildings with all air captured and treated. |
| Leak/spillage of contaminated stormwater or leachate | Low | * Tank or pump failure * Incorrect operation of water systems | * SCADA sensors and alarms for water storage and pumping equipment * Design of water systems to minimise risk and provide redundancy * Spare water storage capacity is maintained at all times * Spill kits are available on site * Whole site first flush system acts as a backup bund |

Other general pre-emptive measures include:

* Site security: the site has perimeter security fencing and 24 hours security arrangements to reduce risk of damage as a result of break-ins;
* Training: site inductions and training are undertaken so people understand appropriate work practices and appropriate actions to prevent hazards occurring. Exercises are periodically conducted to test emergency processes and to understand procedures; and
* Maintenance: effective systems of planned maintenance, inspection, testing and minor modifications are in place at ECO to reduce associated risks to ‘as low as reasonably practicable’. Regular plant and equipment maintenance activities ensure that the plant and equipment retain their standards. Safety critical equipment and procedures identified are maintained, inspected and tested rigorously. The regular plant and equipment maintenance activities are carried out according to the Maintenance Safe Operating Procedures.

Hard copies of the MSDSs for chemicals or fuels used or stored at the UR-3R Facility (including safety equipment) are located onsite.

Controls for the use, handling and storage of all hazardous substances at the site are specified in the ECO Management System. The Management System specifies safety related procedures along with details of mechanisms for ensuring adherence to procedures. As such the Management System is the controlling document for all operations on-site involving potentially hazardous activities.

### Potential Pollutants

The PIRMP must include an inventory of potential pollutants kept at the UR-3R facility or used in carrying out activities at the site.

The list of hazardous goods and other potential pollutants likely to be stored or held; the maximum quantity likely to be stored or held; and the storage location is provided in the Summary Emergency Plan and is updated when required.

The storage locations of potential pollutants are recorded on the Emergency Response Site Diagram (located with the Summary Emergency Plan).

### Safety Equipment

This section of the PIRMP provides a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.

A list of the safety equipment and the location where this equipment is stored is provided in Table 3. Additional product or activity-specific safety equipment may be required and is detailed in the site procedures.

Table Safety Equipment

|  |  |
| --- | --- |
| Description | Storage Location |
| PPE (as required and listed within the site procedures) | Each person maintains and stores own PPE |
| First aid kits | Office  Maintenance  Supervisors’ office  Laboratory  Guardhouse |
| Automatic Defibrillator & Oxygen kits | Office |
| Spill kits/bins | Located as per map in induction |
| Emergency shower | Vehicle wash bay |
| Break-glass alarms & smoke detectors (alarmed to brigade) | Various locations |
| Fire hose reels and extinguishers | Various locations |
| Fire hydrants | Located as per map in induction |
| LPG isolation point | LPG tanks |
| Electricity Isolation point | Switch room |

All emergency equipment is checked periodically to ensure it is in place and operational.

### Staff Training

Training on the PIRMP will be provided to all personnel working at the UR-3R Facility (employees and contractors). The objective of the training is to inform all workers of the process to be followed in the event of a pollution incident, the notification protocol, and actions to be taken.

PIRMP training would initially occur as part of a toolbox talk.

All new employees and contractors working at the site would be briefed on the PIRMP as part of their induction and briefing on emergency procedures.

Ongoing training would be provided annually at formal training sessions. At the annual training sessions desktop scenarios would be discussed based on the likely risks and potential incidents that could occur at the site.

If a change is made to the PIRMP that impacts on the procedures to be followed in the event of a pollution incident, the update would initially be communicated as part of a toolbox talk.

Training records will be filed in hard copy or electronically as per normal procedures.

### Testing the Plan

To check that the PIRMP works effectively the PIRMP must be tested:

* Routinely at least once every 12 months; and
* Within one month of any pollution incident occurring.

The objective of testing is to assess whether the information included in the PIRMP is accurate and up to date and the PIRMP is capable of being implemented in a workable and effective manner.

The routine testing will be a desktop assessment. During the desktop assessment the PIRMP will be reviewed and all components of the plan will be checked:

* Contact details will be checked to ensure they are up-to-date;
* Procedures in the PIRMP will be checked to ensure they are workable, and
* Training competency and feedback will be considered to assess the effectiveness of PIRMP training.

Annual PIRMP testing is recorded and records are stored, including:

* The dates on which the plan has been tested; and
* The name of the person who carried out the test.

Following testing, if the PIRMP is updated, the dates on which the plan is updated will be recorded also.

### Plan Availability

#### Onsite PIRMP availability

A copy of this PIRMP must be kept at the site and is to be readily available to any person who is responsible for implementing the plan.

In accordance with the POEO Regulation, a copy of the PIRMP is to be made readily available to an authorised EPA officer on request.

#### Public availability

The PIRMP is to be made publicly available in a prominent position on the Global Renewables Australia (GRA) website within 14 days after it is prepared. The parts of the PIRMP that must be made publicly available are specified in 98D(3) of the POEO Regulation (which refers to parts of the POEO Act and the POEO Regulation). The parts of the PIRMP that must be made publicly available are listed in Table 4.

Table PIRMP information to be publicly available

| Information required | Relevant Section of this PIRMP |
| --- | --- |
| POEO Act, section 153C(a) |  |
| The procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:  (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and | Section 7 |
| (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, *[the local authority is Blacktown City Council. The area in which the site is located is described in Section 5],* and | Section 0 and 7 |
| (iii) Any persons or authorities required to be notified by Part 5.7 *[that is: the regulatory authorities; and commercial, industrial, and residential neighbours as directed by the EPA].* | Section 0 and 7 |
| POEO Regulation, clause 98C(1) |  |
| (h) The contact details of each relevant authority referred to in section 148 of the Act:   * the appropriate regulatory authority [*i.e. the EPA*], * ~~if the EPA is not the appropriate regulatory authority - the EPA,~~ * if the EPA is the appropriate regulatory authority - the local authority for the area in which the pollution incident occurs *[the local authority is Blacktown City Council],* * the Ministry of Health, * the WorkCover Authority, and * Fire and Rescue NSW. | Section 6.3 |
| (i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on | Section 7.2 |

Any personal information within the meaning of the [*Privacy and Personal Information Protection Act 1998*](http://www.legislation.nsw.gov.au/xref/inforce/?xref=Type%3Dact%20AND%20Year%3D1998%20AND%20no%3D133&nohits=y) is not required to be included in the PIRMP that is made publicly available.

### References

| Document | Filename/Reference | File Location |
| --- | --- | --- |
| Emergency Management Plan | Section 6 of Management Plan | Reception, Control Room & Guardhouse |
| Summary Emergency Plan |  | Reception, Control Room & Guardhouse |
| Emergency Response Procedures | ECO-ERP-01, etc | Reception, Control Room & Guardhouse |

### Change History

##### Details of last three changes:

|  |  |
| --- | --- |
|  |  |
| Revision A | First version of the document. |
| Revision B | Updated fire and Rescue NSW phone number. |
| Revision C | Updated Following Scenario training. Additional copy put in Control Room. |
| Revision D | Updated Following Scenario training: Control Room copy included. |

## Appendix A PIRMP Legislative Checklist

The legislative requirements of the PIRMP and where these requirements have been met in this document are shown in **Table 5**.

**Table 5 Legislative Requirements of the PIRMP**

|  |  |  |
| --- | --- | --- |
| **Legislation** | **Requirement** | **Section in this PIRMP where requirement met** |
| **POEO Act:**  **Part 5.7A Duty to prepare and implement pollution incident response management plans** | | |
| 153A   Duty of licence holder to prepare pollution incident response management plan | The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates. | This PIRMP |
| 153C   Information to be included in plan | A pollution incident response management plan must be in the form required by the regulations and must include the following:   1. The procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to: 2. the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and 3. the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and 4. any persons or authorities required to be notified by Part 5.7 | Section 6 |
| 1. A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution. | Section 8 |
| 1. The procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made. | Section 6.5, 7.2 and 8.3 of this document  Further details in individual ERPs |
| 153D   Keeping of plan | A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations. | Section 14.1 |
| 153E   Testing of plan | A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations. | Section 13 |
| 153F   Implementation of plan | If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part. | Section 4.2 |
| **Protection of the Environment Operations (General) Regulation 2009:**  **Part 3A Pollution incident response management plans** | | |
| 98B   Form of plan | 1. A plan is to be in written form. | This PIRMP |
| 1. A plan may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document. | This PIRMP in conjunction with the documents referenced in Section 15 |
| 98C   Additional matters to be included in plan | 1. General The matters required under section 153C (d) of the Act to be included in a plan are as follows: 2. a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity), | Section 9 |
| 1. the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood | Table 2 in Section 9 |
| 1. details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity | Table 2 in Section 9 |
| 1. an inventory of potential pollutants on the premises or used in carrying out the relevant activity | Section 10  Further detail in the Summary Emergency Plan |
| 1. the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates | Section 10  Further detail in the Summary Emergency Plan |
| 1. a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident | Table 3 in Section 11 |
| 1. the names, positions and 24-hour contact details of those key individuals who: 2. are responsible for activating the plan, and 3. are authorised to notify relevant authorities under section 148 of the Act, and 4. are responsible for managing the response to a pollution incident | Section 6.2 and 6.3  Contact details are in the Summary Emergency Plan |
| * 1. the contact details of each relevant authority referred to in section 148 of the Act | Section 6.3 |
| * 1. details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on | Section 7.2 |
| * 1. the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on | Section 8.1 |
| * 1. a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises | Figure 1, Appendix B and the Emergency Site Diagram displayed with the Summary Emergency Plan |
| * 1. a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk | Section 8.2 |
| * 1. the nature and objectives of any staff training program in relation to the plan | Section 12 |
| * 1. the dates on which the plan has been tested and the name of the person who carried out the test | Section 13 |
| * 1. the dates on which the plan is updated | Section 13, 16 and the Revision Table on the first page |
| * 1. the manner in which the plan is to be tested and maintained. | Section 13 |
| 1. Trackable waste transporters | Not applicable. |
| 98D   Availability of plan | 1. A plan is to be made readily available: 2. to an authorised officer on request, and 3. at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan. | Section 14.1 |
| 1. A plan is also to be made publicly available in the following manner within 14 days after it is prepared: 2. In a prominent position on a publicly accessible website of the person who is required to prepare the plan, 3. If the person does not have such a website—by providing a copy of the plan, without charge, to any person who makes a written request for a copy. | Section 14.2 |
| 1. Subclause (2) applies only in relation to that part of a plan that includes the information required under: 2. section 153C (a) of the Act, and 3. clause 98C (1)(h) and (i) or (2)(b) and (c) (as the case requires). | Table 4  This entire document will be made available. |
| 1. Any personal information within the meaning of the [*Privacy and Personal Information Protection Act 1998*](http://www.legislation.nsw.gov.au/xref/inforce/?xref=Type%3Dact%20AND%20Year%3D1998%20AND%20no%3D133&nohits=y)is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1). | Section 14.2 |
| 98E   Testing of plan | 1. The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner. | Section 13 |
| 1. Any such test is to be carried out: 2. Routinely at least once every 12 months, and 3. Within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner. | Section 13 |

## Appendix B Surrounding Area

Figure 1 showing the site and surrounds.

**Grey triangle**: UR-3R Facility

**Orange**: nearest industrial neighbours

**White**: nearest residential neighbours

**Yellow**: nearest agricultural neighbours (chicken farm)

**Pale blue**: drainage line to Reedy creek

**Dark blue**: underground water pipes

**Purple**: aboveground water pipes

Figure 2 showing detail of the easement and access to site.