

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



BATHURST REGIONAL INTERMODAL TERMINAL
95 LEE STREET KELSO NSW 2795

1. ADMINISTRATION

1.1 PURPOSE

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire & Rescue NSW, WorkCover NSW and the local council.

This Pollution Incident Response Management Plan (PIRMP) has been prepared to comply with the new requirements introduced by the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) that requires the preparation and implementation of a PIRMP.

The purpose of this PIRMP is to assist employees and management of **CWLT Logistics** to identify the potential risk of a pollution incident occurring, introduce measures to mitigate that risk and to give direction in making quality decisions should a pollution incident occur. This PIRMP contains guidance in determining the appropriate pre-emptive actions needed to 'prevent material harm' to the environment.

1.2 OBJECTIVE & SCOPE

It is **CWLT Logistics'** intent to prevent all foreseeable pollution incidents that might impact on the environment and the safety of employees, facility users & neighbours, through the implementation of standard operational procedures, undertaking routine site activity inspections, regular training of personnel in the implementation of operational procedures and through emphasising & supporting proactive incident prevention reporting.

However, it is recognised that pollution incidents are not totally preventable. Therefore, this PIRMP has been developed to achieve the following objectives:

- Reduce the likelihood of a pollution incident occurring at the facility through identification of risks and the development of planned actions to minimize and manage those risks.
- Ensure comprehensive and timely communication about a pollution incident to all staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as NSW Ministry of Health, WorkCover NSW, and Fire & Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementation and ensuring that the PIRMP is regularly tested for accuracy, currency and suitability.
- Provide guidance on how to respond to an environmental pollution incident and how to record and report such an event.

This PIRMP contains guidance in determining the appropriate actions to take to prevent pollution incident, injury or property damage and how to respond should a pollution incident occur. The PIRMP also includes provisions for record keeping, testing, reporting and document revision.

1.3 LEGISLATIVE CONTEXT

The specific requirements for PIRMPs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation 2). In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO (G) Regulation (clause 98B).
- Licensees must keep the Plan at the premises to which the Environment Protection Licence relates or, in the case of traceable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO (G) Regulation (clause 98E).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the Plan (section 153F, POEO Act).

1.4 KEY TERMS & MEANINGS

An understanding and appreciation of the following key terms is considered integral to the successful implementation of this PIRMP.

1.4.1 POLLUTION INCIDENT

The definition of 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 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'

1.4.2 MATERIAL HARM TO THE ENVIRONMENT

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 the Regulations), and*
- (iii) 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'.*

1.4.3 IMMEDIATE REPORTING REQUIREMENT

Industry is now required to report pollution incidents 'immediately' to the EPA, NSW Health, Fire & Rescue NSW, Work Cover NSW and the local council.

1.5 FACILITY COVERED BY THIS PIRMP

The operation of the **CWLT Logistics (EPA Licence 20497)** is covered by this PIRMP.

1.6 STAFF AWARENESS/TRAINING

This section of the plan provides details on the process that will be used by employees on site and off site to make them aware of the plan requirements and document the process for regular testing of the plan.

All new employees will be made aware of the requirements of the plan as part of their induction process. All employees are required to complete refresher training on a biannual basis.

In addition to the above induction and training, details of the plan will be provided to the key contacts and members of the emergency response team on site and off site.

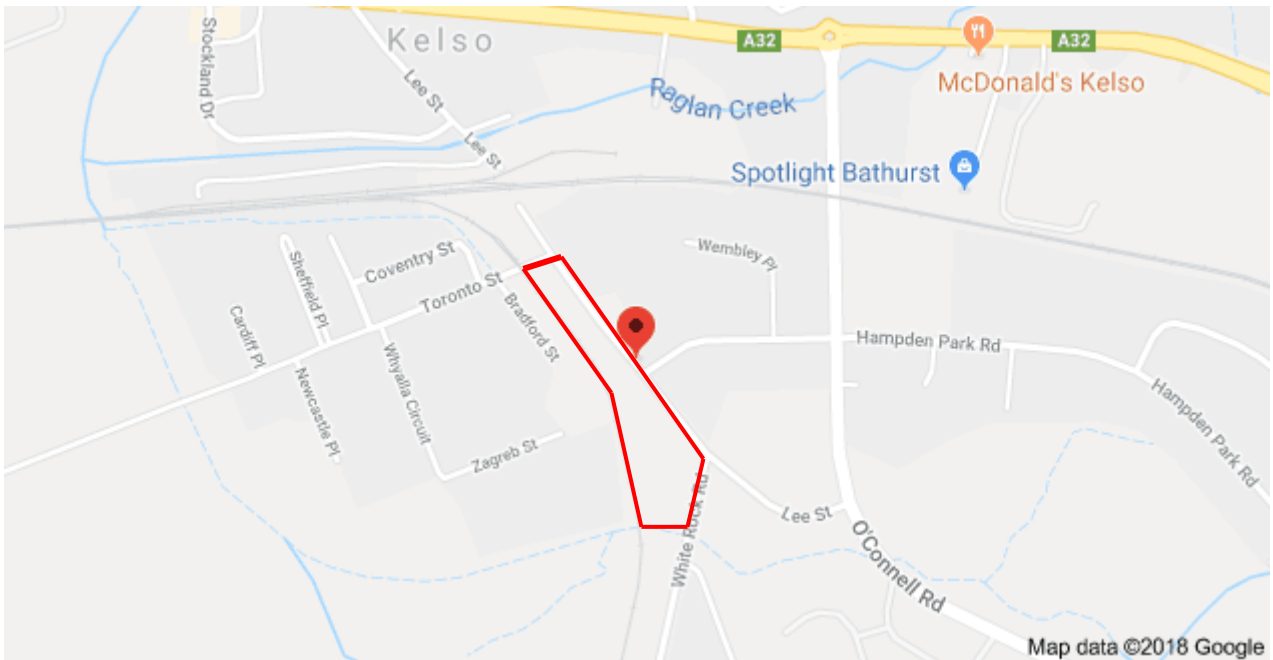
Training requirements will be identified and the sites operation training matrix. Records of training will be maintained in personnel files.

2. FACILITY DETAILS

2.1 LOCATION

NAME OF THE FACILITY:	CWLT LOGISTICS
ADDRESS:	95 LEE STREET KELSO NSW 2795
PROPERTY DESCRIPTION:	BATHURST REGIONAL INTERMODAL TERMINAL
OWNER:	MR LEWIS DUNN

FIGURE 01 - LOCATION MAP:



3. POLLUTION INCIDENT PREVENTION & PREPAREDNESS

3.1 PREVENTION AS AN INCIDENT RESPONSE

CWLT Logistics is committed to minimising the circumstances under which pollution incidents may occur. Through the use of regularly scheduled meetings, employee and contractor's orientations, training programs, routine inspections of activity areas and the application of standard operational procedures, employees and contractor's personnel will be able to identify and respond to conditions that might lead to a pollution incident.

CWLT Logistics Employees are instructed, as part of their site inductions and ongoing training, in the steps to report and respond to facility conditions or issues that might give rise to pollution incidents where these conditions/issues are found to exist.

Potential pollution hazards are provided as follows:

POTENTIAL HAZARD	PRE-EMPTIVE ACTION
<ul style="list-style-type: none"> • Oil / Fuelspills. • Dust • Gas Release (from fumigation procedure conducted by sub- contractor) 	<p style="text-align: center;">Undertaking routine Inspections in accordance With the Environmental Checklists</p> <p style="text-align: center;">Responding in accordance with Safe Work Method Statements</p>

3.2 REGISTER OF POTENTIAL POLLUTANTS

Potential pollutants kept on the premises or used in carrying out activities at the premises, including the maximum quantity of any potential pollutant that is likely to be stored or held at the premises together storage locations are summarized as follows:

POLLUTANT TYPE / SUBSTANCE	FORM	QUANTITY	LOCATION	TYPE OF CONTAINMENT	MSDS
Diesel	Liquid	Up to 200 litres	Incoming Trucks	Fuel Tank	MSDS register at vehicle checking station
Petrol	Liquid	Up to 20 litres	Compound Vehicle Checking Station	Jerry Can	
Oil / Water Based Paint	Spray Can	Up to 10 litres	Compound Storage Shed	Domestic Packaging	
Methyl Bromide	Gas	Up to 1 litre	Controlled by Sub-Contractor during fumigation	Container	
Sulphuryl Flouride	Gas	Up to 1 litre	Controlled by Sub-Contractor during fumigation	Container	

3.3 NATURE AND LIKELIHOOD OF POLLUTION INCIDENTS

Possible pollution incidents associated with the operation of the Facility are:

- Spill of chemicals, fuels, oils or other hazardous materials
- Dust or sedimentation

3.3.1 LIKELIHOOD

Determination of the probability or likelihood of environmental harm, damage or loss occurring as a result of a pollution incident using the ranking risk factors by probability methodology contained in the following table.

RATING	MEASURE	DESCRIPTION
1	Possible	Might occur at some time
2	Possible	Might occur at some time dependent on weather conditions

3.3.2 CONSEQUENCE

Determination of the consequence of the potential environmental harm, damage or loss using the ranking risk factors by consequence methodology contained in the following table.

RATING	MEASURE	DESCRIPTION
1	Moderate	Minor (usually reversible) some potential for low level environmental impacts which can be easily managed
2	Moderate	Minor (usually reversible) some potential for low level environmental impacts which can be easily managed

3.3.3 RISK EVALUATION

Individual evaluation of the management priority for each potential pollution incident using the risk priority matrix presented in the following figure.

LIKELIHOOD	CONSEQUENCES				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	M	H	H	E	E
Likely	M	M	H	H	E
Possible	L	M	M	H	E
Unlikely	L	M	M	M	H
Rare	L	L	M	M	H

4. POLLUTION INCIDENT CONTROL & RESPONSE

4.1 NOTIFYING AUTHORITIES

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 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.”

If a spill occurs on site that has resulted in or has the potential to cause material harm to the environment the following authorities will be notified immediately.

ORGANISATION	CONTACT NAME	CONTACT DETAILS
Individual for activating the plan and managing the response	Operations Manager	0427034560
NSW Fire & Rescue	Duty Officer	000
NSW Police	Duty Officer	000 63318699
NSW Ambulance Service	Duty Officer	000
Bathurst Base Hospital	Reception	63305311
Environment Protection Authority (EPA)	EPA Environment Line	131555
Work Cover Authority	Duty Officer	131050
State Emergency Service (SES)	Duty Officer	132500
POISONS Information	Duty Officer	131126

4.2 COMMUNITY NOTIFICATION STRATEGY

WHO WILL BE NOTIFIED?

All community stakeholders that may be affected by a spill will be notified. These include:

- Neighbouring residential property owners
- Neighbouring commercial properties
- Public within the vicinity of the site:
 - Pedestrians
 - Motorists
 - Users of nearby recreational facilities (Sporting facilities, parks etc)
 - Nearby water courses (Rivers, streams, dams etc) used for recreational and/or commercial purposes
- Farmers located downstream from water courses affected by a spill
- Schools
- Churches
- Nursing homes

WHEN WILL THE COMMUNITY BE NOTIFIED?

If a spill presents a significant risk of causing material harm to persons, property, and/or the environment to an area that is not trivial, any community stakeholders within these areas will be notified at the earliest convenience.

HOW WILL THE COMMUNITY BE NOTIFIED?

When it has been established that a community stakeholder is at risk from a spill that has the potential to cause material harm the following process will be implemented:

- 1) Community stakeholders will be contacted immediately after the relevant authorities have been contacted by telephone (or face to face if this is not possible).
- 2) Stakeholders will be advised of recommended actions that can be taken to prevent or minimise material harm e.g. evacuate area, shut all doors and windows, cease drawing water for irrigation purposes.
- 3) After the spill has been contained and managed by key personnel and authority's subsequent communication will be undertaken by the National Environmental Manager and relevant environmental advisors. These may include:
 - Follow up telephone calls and/or face to face contact
 - Meetings with stakeholders
 - Written correspondence containing updates regarding safety and environmental concerns associated with the pollution incident

4.3 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

If it is suspected that an incident may cause material environmental harm the Pollution Incident Management Response Plan will be executed. This plan is based on seven phases:

1. Assess
2. Notify
3. Stop
4. Contain
5. Mitigate
6. Clean up
7. Review

Details of the requirements and responsibilities for each phase are explained in the following pages.

ASSESS

- **Identify the severity, risks, and extent of the incident:**
 - What is the substance emitted?
 - What are its properties?
 - Is there a risk to health and safety?
 - Do you have the necessary PPE to manage the emission?
 - What is the nature of the surrounding area?
 - What is the volume of the emission?
- **If the emission has the potential to cause material harm, execute the next phase of the plan (Notify)**

NOTIFY

Contact key individuals

- **Individuals responsible for activating and managing plans (nominated site representatives)**
- **Individuals authorised to notify and coordinate relevant authorities (nominated site representatives)**

Contact Relevant Authorities

- **Firstly, call 000 if the incident presents an immediate threat to human health or property.**
- **If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order.**
- **The Appropriate Regulatory Authority (ARA)**
- **EPA**
- **Ministry of Health via the local Public Health Unit**
- **Work Cover Authority**
- **The local authority if this is not the ARA**
- **Fire and Rescue NSW**



STOP

- **Stop the source of the emission**
- **Ensure that necessary emergency materials are on hand to control larger emissions**
- **Examples:**
 - Restore drums to upright position
 - Close open valve causing spill
 - Isolate feed line
 - Plug the leak
 - Construct an earthen bund



CONTAIN

- **Utilise barriers (absorbent booms, banks of soil or any other safe objects) or spill absorbent to prevent the emission from spreading.**
- **When an emission is on a hard surface use appropriate absorbent materials i.e. absorbent granules or sand**
- **The main priority is to prevent the emitted material from discharging off site**



MITIGATE

- Implement environmental controls downstream of pollution source to prevent/minimise further impact to receiving environment
- Example:
 - A Fuel spill discharged into quarry dam. Mitigation controls to ensure this spill is not spread may include closing of weirs, or outlets, ensuring water cart does not fill from affected dam etc.



CLEAN UP

- Clean up and remedial actions to restore the environment
- Disposal of pollutants in accordance with regulations



Review

- Conduct an investigation into the event and assist the EPA and investigators with external enquiries
- Complete internal reporting;
 - As per CWLT Logistics WHS requirement
- Test the effectiveness of Pollution Incident Response Management Plan annually and one month after the incident to ensure controls are replenished.