

Company Header

# **POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**For *[site name] [EPL number]***

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## 1. OVERVIEW

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009*.

*[Insert general info regarding site environmental management system and EPL]* Under the legislation referred to above, the EPL also requires a PIRMP to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented. **[confirm that material harm is the threshold for implementing plan – could be lower than that]**

The PIRMP contains the following sections as required by the regulation:

1. **Background** –describes main features of the regulation
2. **Hazard, likelihood and pre-emptive actions to prevent pollution incident risks** – describes type of pollution incidents that may be possible and lists procedures that are already in place to minimise and manage pollution. Ranking of risks is included in appendices
3. **Maps** – map of project to show location of potentially affected neighbours and environmentally sensitive areas
4. **Emergency incident response procedures** – what to do in case of material harm
5. **Early warnings and communication to neighbours** –when to contact neighbours in case of pollution incidents and info required for website
6. **Training** –information to be passed on to staff and contractors
7. **Updating of plan** –frequency of updates
8. **Testing** – frequency of drills to test effectiveness of PIRMP
9. **Implementing of plan** – reference to legislation requirement to carry out aspects of the plan during a pollution incident

### Introduction

The **[site name]** is licensed to **[insert specific details of EPL]**

This site is covered by an Environment Protection Licence (EPL) **number [.....]** for the scheduled activities **[insert description of site activities from EPL]**

The site has an overarching environmental management system supported by **[insert info regarding site or company procedures]**

### Purpose

The purpose of this PIRMP is to improve the way pollution incidents are reported, managed and communicated to the general community.

The purpose of this plan is to:

Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident

Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks

Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

## **Scope**

This PIRMP is for the use of all [site name] staff involved in the [insert activities that have potential for pollution incidents] and [company name] contractors undertaking works on the site. The PIRMP will be implemented only if material harm to human health or the environment occurs or threatens to occur [need to confirm if PIRMP will be implemented at a lower threshold or material harm threshold]

The [site name] site is located at [site location] and holds EPL number [.....]. Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of [company name] staff to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the POEO Act 1997 and the POEO (General) Regulation 2010

## **Responsibilities**

All [company name] staff and contractors are responsible for understanding and implementing this PIRMP as appropriately identified. The PIRMP identifies the general roles and responsibilities of [company name] staff. [permanent contractors on site] shall manage pollution incidents in accordance with this PIRMP.

[Supervisors and managers] are responsible for ensuring that their staff is aware of the PIRMP and their roles where appropriate. They are also responsible for the training of their staff

[environment department or management section] is responsible for:

- assisting with advice, reporting and response process;
- ensuring the Plan is made available to staff responsible for implementing the plan and authorised officers under the POEO Act;
- giving advice on whether environmental incidents need to be reported to external agencies;
- assisting in the notification of pollution incidents to the relevant authorities
- provision of maps associated with the plan;
- assistance with the implementation of response actions to pollution incidents
- assistance in communicating with neighbours and the local community about the Plan and when incidents of a certain nature occur;
- ensuring that training responsible for activating about their roles in the Plan;
- testing; and
- Reviewing this plan.

Legal Branch [if legal branch exists] is responsible for providing legal advice, assisting with investigations of pollution incidents and preparation of reports for the Environment Protection Authority and other regulators for major incidents and ensuring legal compliance of the Plan.

### **Documentation**

The environmental incident register [insert document or spreadsheet name] is used to record and monitor all environmental incidents within [company or site name]. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept by the [insert title of person responsible for keeping register]. The Environment Manager [or insert other person] is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

### **Additional Information**

**Contact:** [insert title and phone number of person responsible for this plan]

**Effective date:** [date that plan is effective]

**Review date:** See Updating of Plan

## 2. EVALUATION

This Pollution incident Response management Plan (the Plan) complies with the requirements under the:

- [POEO Act 1997 Part 5.7A Duty to Prepare and implement Pollution Incident Response management Plans](#)
- [POEO \(General\) Regulation 2009 Part 3A](#)

The requirements under the legislation are supported by the [Environmental Guidelines: Preparation of pollution incident response management plans](#), which provides additional advice from the EPA on Plan preparation.

Plan preparation is a requirement for holders of Environment Protection Licences (EPLs). The [site name] operates under EPL no. [.....] and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

Key areas which this Plan covers are described in table 1 PIRMP Requirements.

PIRMP Legislation covered under this Plan		Reference
<b>POEO Act Part 5.7</b>		
153A	Duty of licence holder to prepare pollution incident response management plan	Whole document plus references
153C	Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities	5 + references
153D	Keeping of plan:	6.3
153E	Testing of plan:	9
153F	Implementation of plan:	10
<b>POEO (General) Regulation 2009</b>		
98C(a)	Hazard assessment:	3.4
98C(b)	Likelihood assessment:	3.4
98C(c)	Pre-Emptive Action:	3.4
98C(d)	Pollutant Inventory Types:	3.4
98C(e)	Pollutant Inventory Quantities:	3.4
98C(f)	Safety Equipment:	3.4
98C(g)	Staff Contacts:	5.1.1
98C(h)	Authority Contact:	5.1.4 + 6.2 + references
98C(i)	Early Warnings Neighbours:	3.4 & 6

98C(j)	Staff Safety:	3.4
98C(k)	Maps location of pollutants:	3.4 and 4
98C(l)	Early Warnings General:	3.4 and 6
98C(m)	Training of Staff:	7
98C(n)	Timing of Testing:	9
98C(o)	Updating of Plan:	8
98C(p)	Plan Testing:	9
98D(1)	Availability of plan:	6.3
98D(2)	Publishing Plan Parts:	6.2 + 6.3
98D(3)	Procedures under Act:	5 + references
98D(4)	Privacy Protection:	6.3
98E(1)	Testing of the Plan:	9
98E(2)	Minimum Testing requirements:	9



### **3. HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS**

#### **Overview**

This chapter deals with the [POEO \(General\) Regulation 2009's sections 98\(a\) to 98\(f\)](#) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.

The [site name] site undertakes [insert information regarding site activities]

This Plan also considers both air and water based pollution incident impacts. Overall considerable design and written environmental management systems are in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

This Plan uses a modular approach to this risk assessment process. Each module represents an operation undertaken in [insert main activity of site] such as use and storage of hazardous chemicals and use and storage of non-hazardous chemicals [insert other activities whose impacts will be assessed in risk assessments]. These modules are common across [insert company name] operations, but include site specific issues for each Plan. They are based on [add name of site EMS]

The risk assessment and control measures process includes impact on neighbours and crosses over with safety risk assessment processes and is covered under [add name of site OHS management system]

Each module also includes an inventory of pollutants or expected maximum quantities of pollutants likely to be stored. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids.

#### **Summary of Pollution Types**

[insert main activity on site] by its nature has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types found for the [site name].

**Table 2: List of Typical Main Pollutants in [insert site activity]**

Description	Comments
<b>Air Based Emissions</b>	
Dust	From [insert sources of dust if any]. Dust is covered under this Plan and also [add any relevant additional procedures].
Fire	Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours. Fire Management is covered under the [insert procedure names that covers fire management eg Emergency Preparedness and Incident reporting]
Noise	Emitted by plant and equipment. Covered under [insert procedure that covers noise management]. Noise is not considered a pollution incident and not covered further under this Plan.
Odour	Odour is generally [not] associated with this site. [if odour is an issue add details] Odour incidents are not considered to be material environmental harm, but are included in the PIRMP for consistency with site EMS
<b>Spill type emissions [this list has examples – will need to be revised to be made site specific]</b>	
Class 3 flammable liquids e.g. Fuels including petrol based fuels and Combustible Liquids (C1 & C2) Lubricants and hydraulic oils and other	For plant and equipment operations. Covered under: <ul style="list-style-type: none"> <li>• [insert document names]</li> <li>•</li> </ul>
Other dangerous Goods classes e.g. Compressed gases Corrosive substances Oxidizing substances Toxics Other dangerous goods	For plant and equipment operations. Covered under <ul style="list-style-type: none"> <li>• [insert document names]</li> <li>•</li> </ul> <p>e.g. Ammonia</p>
Paints, inks and surface coatings	Surface coatings are applied on site. Covered under <ul style="list-style-type: none"> <li>• [insert document names]</li> <li>•</li> </ul>
Pesticides	Control of weeds and pests: Covered under <ul style="list-style-type: none"> <li>• [insert document names]</li> <li>•</li> </ul>
Other chemicals	For plant and equipment operations. Covered under <ul style="list-style-type: none"> <li>• [insert document names]</li> <li>•</li> </ul>
Aqueous wastes	Management of water and stormwater. Covered under: <ul style="list-style-type: none"> <li>• [insert document names]</li> <li>•</li> </ul>
Wastes	Storage of wastes and wastes containing chemicals: Covered under: <ul style="list-style-type: none"> <li>• [insert document names]</li> <li>•</li> </ul>