

**POLLUTION INCIDENT RESPONSE  
MANAGEMENT PLAN  
ManERP031**

**44 Beelbanger Road  
Beelbanger NSW 2680**

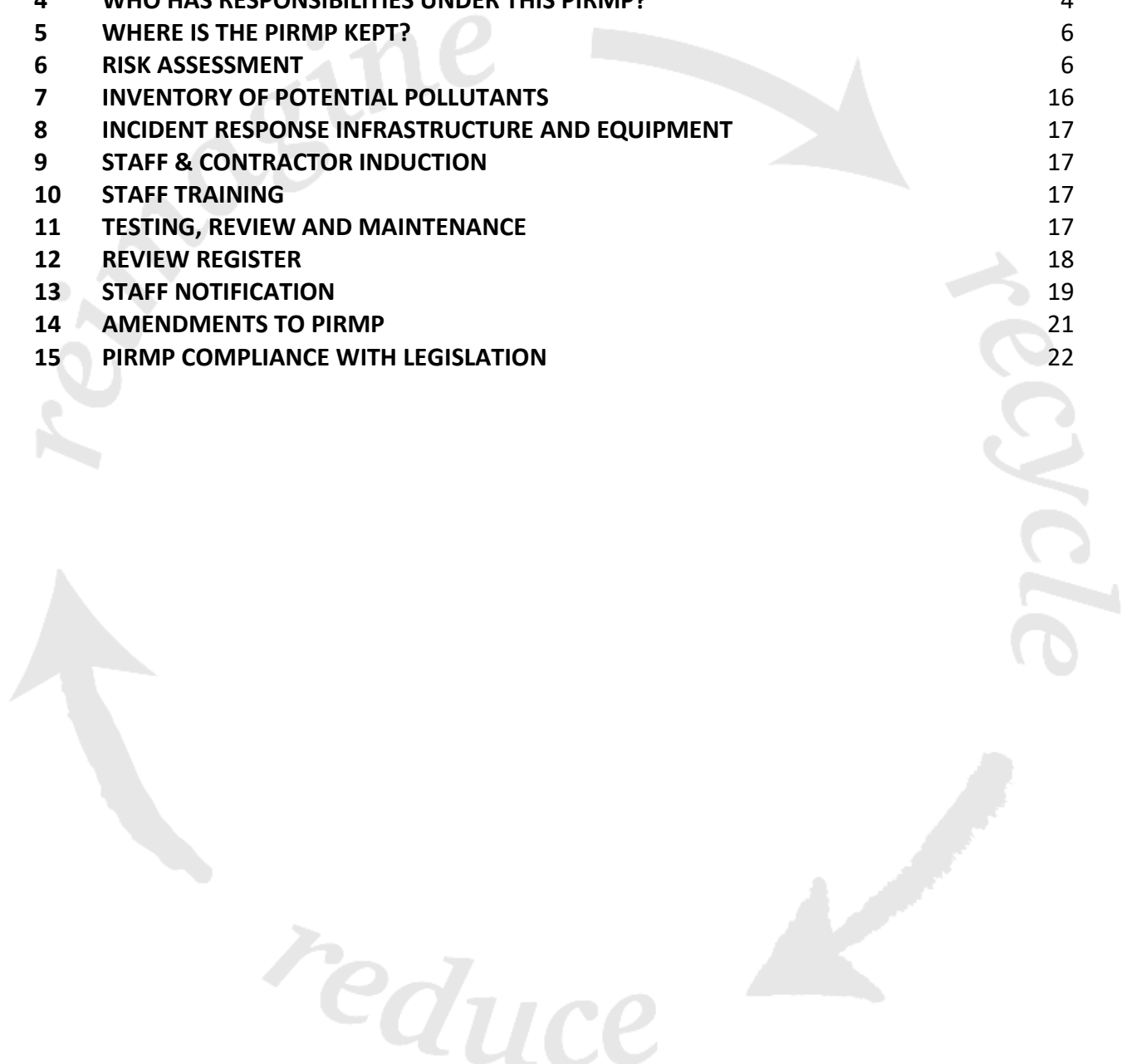
**EPL: 886**

**April 2022**

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**Table of Contents**

<b>1</b>	<b>WHY DO WE NEED A PIRMP?</b>	<b>3</b>
<b>2</b>	<b>PREMISES COVERED BY THIS PIRMP</b>	<b>3</b>
<b>3</b>	<b>WHAT ARE OUR CLOSEST SENSITIVE RECEPTORS?</b>	<b>4</b>
<b>4</b>	<b>WHO HAS RESPONSIBILITIES UNDER THIS PIRMP?</b>	<b>4</b>
<b>5</b>	<b>WHERE IS THE PIRMP KEPT?</b>	<b>6</b>
<b>6</b>	<b>RISK ASSESSMENT</b>	<b>6</b>
<b>7</b>	<b>INVENTORY OF POTENTIAL POLLUTANTS</b>	<b>16</b>
<b>8</b>	<b>INCIDENT RESPONSE INFRASTRUCTURE AND EQUIPMENT</b>	<b>17</b>
<b>9</b>	<b>STAFF &amp; CONTRACTOR INDUCTION</b>	<b>17</b>
<b>10</b>	<b>STAFF TRAINING</b>	<b>17</b>
<b>11</b>	<b>TESTING, REVIEW AND MAINTENANCE</b>	<b>17</b>
<b>12</b>	<b>REVIEW REGISTER</b>	<b>18</b>
<b>13</b>	<b>STAFF NOTIFICATION</b>	<b>19</b>
<b>14</b>	<b>AMENDMENTS TO PIRMP</b>	<b>21</b>
<b>15</b>	<b>PIRMP COMPLIANCE WITH LEGISLATION</b>	<b>22</b>



# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

## 1 WHY DO WE NEED A PIRMP?

Amendments to the *Protection of the Environment Legislation Amendment Act 2014 (PELA)* sought to improve the way pollution incidents are reported and managed in NSW.

The amendments introduced the concept of a Pollution Incident Response Management Plan (**PIRMP**), which intends to improve the way pollution incidents are reported and managed.

PIRMPs are required for companies holding an Environmental Protection Licence. Tarac Technologies, Beelbangerra holds EPL 886.

Note that Tarac Technologies:

- Is required to have a Pollution Incident Response Management plan in place;
- must keep the plan readily available at the premises to which the Environmental Protection Licence relates;
- must test the plan at least once every 12 months and after a pollution incident has occurred at the Beelbangerra Site; and
- must immediately take action under this plan if a “pollution incident” occurs that causes or threatens material harm to the environment.

This document details the procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment. The notification of environmental incidents under this PIRMP is only required for those incidents causing, or threatening to result in, material environmental harm.

### What needs to be in a PIRMP?

The specific requirements for PIRMPs are set out in the *Protection of the Environment Operations (POEO) Act* and the *Protection of the Environment Operations (General) Amendment Pollution Incident Response Management Plans) Regulation 2012 (POEO (G) A Regulation)*.

## 2 PREMISES COVERED BY THIS PIRMP

Environment Protection License: 886

Tarac Technologies  
Beelbangerra Distillery  
44 Beelbangerra Road  
Beelbangerra NSW 2680

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

### 3 WHAT ARE OUR CLOSEST SENSITIVE RECEPTORS?



The surrounding area, which may potentially be impacted by a pollution incident occurring at the site, includes the following:

- Landholders adjacent to the property;
- Beelbangera Primary School
- Murray Irrigation Ltd channel

### 4 WHO HAS RESPONSIBILITIES UNDER THIS PIRMP?

All personnel have responsibility to ensure emergencies are managed **where it is safe to do so**. The following specific responsibilities should be observed during an emergency.

#### All Personnel

Upon hearing alarm.

- If Safe To Do So, switch off gas, air conditioning, plant, appliances.
- Leave lights on.
- EVACUATE immediately to an Emergency Assembly Point, check co-workers/contractors/visitors are out of rooms and building as you leave.
- Report to supervisor.
- If no supervisor at assembly point, communicate to Chief / Area Warden via radio.

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

- Stand by for further instructions
- Do not leave the assembly area until the all clear has been given by the Chief Warden or the Area Warden

### Warden (Senior Person on Shift)

- EVACUATE immediately to Emergency Assembly Point.
- Assign a person to control traffic entry.
- Liaise with staff to ensure everyone is accounted for.
- Co-ordinate response until emergency services arrive.
- Coordinate emergency response parties (RFS, Ambulance etc)
- Support emergency services to control the emergency.
- Broadcast the 'all clear' following an emergency.
- Report the Incident in accordance with Hazard Incident Reporting Incident Investigation Procedures.
- Notify the applicable Senior Management that an emergency has occurred

### CEO

- Manage liaison for incidents with the potential involvement of government authorities, external stakeholders or media.
- Co-ordinate the formal reporting of the emergency to State Authorities if applicable.
- Notify Board of emergencies.
- Nominate and participate in the investigation of emergencies.
- Ensure action is taken to prevent a recurrence.

### Shift Supervisor (Communications Officer)

- Instigate emergency systems testing annually.
- Coordinate visitors register / staff numbers during an evacuation.

### Contractors

- Undertake Tarac Contractor Management System on-line Induction prior to commencing work.
- Follow instruction of Employees or Emergency Response Personnel (ie. Wardens etc)

### Visitors

- Sign in to Tarac Contractor Management System upon arrival on site.
- Remain with Tarac employee visiting.
- Follow instruction of Employees or Emergency Response Personnel (ie. Wardens etc)

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

<b>TARAC TECHNOLOGIES - CONTACT NUMBERS</b>	
Tarac Beelbangera Site Office (usually unattended)	<b>02 6963 5360</b>
Scott Blenkiron (Tarac Beelbangera Site Supervisor)	0428 843 097
Chris Buckton (Tarac Operations Manager)	0438 079 236
Jeremy Blanks (Tarac CEO)	0412 103 501
Gillian Standen-Thomas (Tarac HR Manager)	0457 348 701

**5 WHERE IS THE PIRMP KEPT?**

This PIRMP will be:

- available in written form at the site;
- available to all personnel responsible for implementing the plan (see table above);
- made available to an authorised officer on request, including an EPA officer; and
- posted on the Tarac website.

**6 RISK ASSESSMENT**

Risks are assessed in accordance with AS/NZS ISO 31000:

Tarac have identified the following situations as potential sources of environmental harm

- Disruption of Power Supply
- Storms &/or Flooding
- Fires
- Spillage Or Emission (Including Hazardous Substances)
- Loss Of Access to Effluent Disposal
- Vandalism / malicious intent

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**DISRUPTION OF POWER SUPPLY**

Event	Detail	Impact	Likelihood	Control	Release
Loss of power to marc stills.	Pumps, Augers, Compressors, Boiler will stop functioning	Nil impact	Low	<ul style="list-style-type: none"> <li>Battery backup on control panel</li> </ul>	Nil identified
Loss of power to column stills.	Computer goes down, pumps, boiler, compressor stop functioning	Nil impact	Low	<ul style="list-style-type: none"> <li>Loss of power to compressor will result in valves failing closed</li> </ul>	Nil identified
Loss of power to pumps.	Unable to move product or stop product overflowing	<u>Surface Water contamination</u> Back flow from transfer pump	Low	<ul style="list-style-type: none"> <li>Emergency Pre-Planning</li> <li>Bunded Walls</li> <li>Backflow valves on pumps</li> <li>All surfaces sealed</li> <li>Spill kits</li> <li>Closed waste system</li> <li>All waste-water collected prior to release</li> <li>As above</li> </ul>	Nil identified
		<u>Groundwater contamination</u> As above	Low		
		<u>Soil Contamination</u> As above	Low		



**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**STORMS & / OR FLOODING**

Event	Detail	Impact	Likelihood	Control	Release
Continuous heavy rain	Extended rainfall causing pooling / stormwater build-up	<u>Air emission</u> Nil	NA	• NA	NA
		<u>Surface Water contamination</u> Water runoff would be contaminated by anything left on the roadway.	Possible	• Emergency Pre-Planning • Immediate Clean up of spillage • Spill kit	Refer ERP 4.7
		Reduction in bund capacity by rainwater collection in bund	Possible	• Emergency Pre-Planning • Workplace inspections • Scheduled release after rain event	
		<u>Groundwater contamination</u> Overflow to MIA supply channel	Low	• Channel at high point of property	
		<u>Soil Contamination</u> Nil	NA	• NA	NA
		Flood	Overflow from MI Supply channel – unlikely – MI scheme in place	<u>Air emission</u> Nil	NA
		<u>Surface Water contamination</u> Flood water contaminated by any spills to bitumen surfaces	Low	• Immediate Clean up of spillage	Refer ERP 4.7
		<u>Groundwater contamination</u> Nil	NA	• NA	NA
		<u>Soil Contamination</u> Nil	NA	• NA	



**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

Storm	High Wind / Lightning	<u>Air emission</u> Only if wind / lightning causes plant damage leading to fire or spillage	Low	• NA	Refer ERP 4.7
		<u>Surface Water contamination</u> Only if wind / lightning causes plant damage leading to fire or spillage	Low	• NA	
		<u>Groundwater contamination</u> Only if wind / lightning causes plant damage leading to fire or spillage	Low	• NA	
		<u>Soil Contamination</u> Only if wind / lightning causes plant damage leading to fire or spillage	Low	• NA	

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**FIRE**

Event	Detail	Impact	Likelihood	Control	Release
Ignition of vapour	By electrical equip malfunction, static electricity, malicious intent	<u>Air emission</u> Smoke / vapour release	Low	<ul style="list-style-type: none"> <li>hazardous zone rated equipment / cabling</li> <li>annual compliance inspection</li> <li>Extinguishers / hoses</li> <li>tag &amp; test</li> <li>Hot Work Permits</li> <li>EXE Compliant fittings</li> <li>earthing of vehicles</li> <li>intrinsically safe clothing</li> <li>seek assistance (CFS etc)</li> </ul>	Refer ERP 4.7
		<u>Surface Water contamination</u> contaminants such as fire retardants, foams, water etc may contaminate storm water / effluent retention areas	Low	<ul style="list-style-type: none"> <li>as above plus</li> <li>spill kits to Isolate entry points to stormwater &amp; effluent collection systems.</li> </ul>	
		<u>Groundwater contamination</u> bitumen sealed surfaces may be broken / melted only in extreme fire situation	Low	Sealed surfaces nil	
		<u>Soil Contamination</u> bitumen sealed surfaces may be broken / melted only in extreme fire situation	Low	Sealed surfaces nil	

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**SPILLAGE OR EMISSION (INCLUDING HAZARDOUS SUBSTANCES)**

Event	Detail	Impact	Likelihood	Control	Release
Stills / boiler malfunction	Stills over pressurize	<u>Air emission</u> Venting alcohol to atmosphere	Low	<ul style="list-style-type: none"> <li>• Unlikely – air valves will release pressure</li> <li>• Manual shutdown - release</li> </ul>	Refer ERP 4.4
		<u>Surface Water contamination</u> Alcohol discharge to ground	Low	<ul style="list-style-type: none"> <li>• Bunded areas</li> <li>• Immediate Clean-up of spillage</li> <li>• Spill kits</li> <li>• Stormwater collection</li> </ul>	
		<u>Groundwater contamination</u>	Low	<ul style="list-style-type: none"> <li>• Nil</li> <li>• Sealed surfaces</li> <li>• Bunds</li> </ul>	
		<u>Soil Contamination</u>	Low	<ul style="list-style-type: none"> <li>• Nil</li> <li>• Sealed surfaces</li> <li>• Bunds</li> </ul>	
Pump / Tanker spill	Spillage whilst emptying / filling tankers,	<u>Air emission</u> Minor vapour release in hot weather	Low	<ul style="list-style-type: none"> <li>• Spray water mist over spill if necessary</li> <li>• PPE (respirators, goggles)</li> </ul>	Refer ERP 4.4
		<u>Surface Water contamination</u> Alcohol discharge to ground	Low	<ul style="list-style-type: none"> <li>• Bunded areas</li> <li>• Immediate Clean up of spillage</li> <li>• Spill kits</li> </ul>	
		<u>Groundwater contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>• Sealed surfaces</li> <li>• Bunds</li> </ul>	
		<u>Soil Contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>• Sealed surfaces</li> <li>• Bunds</li> </ul>	
Other Chemical Spills	eg. effluent, Forklift LPG Diesel in Trucks Petrol in vehicles	<u>Air emission</u> vapour release	Low	<ul style="list-style-type: none"> <li>• Spray water mist over spill if necessary</li> <li>• PPE (respirators, goggles)</li> </ul>	Refer ERP 4.4

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

	Petrol in drums Welding gases, Laboratory gas, LPG Natural Gas Boiler Chemicals	<u>Surface Water contamination</u> discharge to ground	Low	<ul style="list-style-type: none"> <li>• Bunded areas</li> <li>• Immediate Clean up of spillage</li> <li>• Spill kits</li> </ul>	
		<u>Groundwater contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>• Sealed surfaces</li> </ul>	
		<u>Soil Contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>• Sealed surfaces</li> </ul>	
Rupture of gas delivery pipe	Natural gas pipe rupture on property	<u>Air emission</u> vapour release	Low	<ul style="list-style-type: none"> <li>• Isolate area</li> <li>• Turn off at main isolation point</li> <li>• Remove ignition sources</li> <li>• PPE (respirators, goggles)</li> <li>• Seek assistance</li> <li>• Notification procedure</li> </ul>	Refer ERP 4.4
		<u>Surface Water contamination</u> NA	NA	<ul style="list-style-type: none"> <li>•</li> </ul>	
		<u>Groundwater contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>•</li> </ul>	
		<u>Soil Contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>•</li> </ul>	
Rupture of water delivery pipe	Water pipe rupture on property	<u>Air emission</u> NA	NA	<ul style="list-style-type: none"> <li>•</li> </ul>	Refer ERP 4.4
		<u>Surface Water contamination</u> Additional run-off to collection areas	Low	<ul style="list-style-type: none"> <li>• Isolate area</li> <li>• Turn off at main isolation point</li> <li>• Seek assistance</li> <li>• Notification procedure</li> </ul>	
		<u>Groundwater contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>•</li> </ul>	
		<u>Soil Contamination</u> NA	NA	<ul style="list-style-type: none"> <li>• Nil</li> <li>•</li> </ul>	

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**LOSS OF ACCESS TO EFFLUENT DISPOSAL**

Event	Detail	Impact	Likelihood	Control	Release
Failure to discharge collection pond	Unable to transfer effluent to evap ponds	<u>Air emission</u> NA	NA	•	Refer ERP 4.4
		<u>Surface Water contamination</u> Temporary storage sumps backup & overflow	Low	<ul style="list-style-type: none"> <li>• Overfill switches</li> <li>• Monitoring sump levels</li> </ul>	
		<u>Groundwater contamination</u> NA	NA		
		<u>Soil Contamination</u> NA	NA		

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**VANDALISM / MALICIOUS INTENT**

Event	Detail	Impact	Likelihood	Control	Release
Ignition of vapour	intentional ignition by malicious intent / vandalism	<u>Air emission</u> Smoke / vapour release	Low	<ul style="list-style-type: none"> <li>• All vats door locked</li> <li>• hazardous zone rated equipment / cabling</li> <li>• annual compliance inspection</li> <li>• Extinguishers / hoses</li> <li>• tag &amp; test</li> <li>• Hot Work Permits</li> <li>• EXE Compliant fittings</li> <li>• earthing of vehicles</li> <li>• intrinsically safe clothing</li> <li>• seek assistance (RFS etc)</li> </ul>	Refer ERP 4.7
		<u>Surface Water contamination</u> contaminants such as fire retardants, foams, water etc may contaminate storm water / effluent retention areas	Low	<ul style="list-style-type: none"> <li>• as above plus</li> <li>• spill kits to isolate entry points to stormwater &amp; effluent collection systems.</li> </ul>	
		<u>Groundwater contamination</u> bitumen sealed surfaces may be broken / melted only in extreme fire situation	Low	Sealed surfaces nil	
		<u>Soil Contamination</u> bitumen sealed surfaces may be broken / melted only in extreme fire situation	Low	Sealed surfaces nil	

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

Release of product	intentional release by malicious intent / vandalism	<u>Air emission</u>	Low	<ul style="list-style-type: none"> <li>• Spray water mist over spill if necessary</li> <li>• PPE (respirators, goggles)</li> </ul>	Refer ERP 4.4
		Minor vapour release in hot weather			
		<u>Surface Water contamination</u>	Low	<ul style="list-style-type: none"> <li>• Bunded areas</li> <li>• Immediate Clean up of spillage</li> <li>• Spill kits</li> </ul>	
		Alcohol discharge to ground			
		<u>Groundwater contamination</u>	NA	<ul style="list-style-type: none"> <li>• Sealed surfaces</li> </ul>	
NA					
<u>Soil Contamination</u>	NA	Nil			
NA			<ul style="list-style-type: none"> <li>• Sealed surfaces</li> </ul>		



## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

## 7 INVENTORY OF POTENTIAL POLLUTANTS

The SDS for the listed chemicals are available on Chemwatch or on-site.

Material	UN No.	DGC	Sub Risk	Pkg Class	Max Vol	
<b>FUEL STORAGE AREA</b>						
Diesel	3082	9	-	III	2,000	ltrs
<b>MAINT WORK AREA</b>						
Argon	1006	2.2	-	-	4.9	Cub Mtrs
Oxygen	1072	2.2	5.1	-	8.9	Cub Mtrs
Acetylene	1001	2.1	-	-	7.0	Cub Mtrs
<b>OIL SHED</b>						
Mobil MX 15W-40	-	-	-	-	60	ltrs
Mobil DTE 26	-	-	-	-	80	ltrs
Mobil Mobilgrease XHP 222 Special	-	-	-	-	18	kg
Mobil 424	-	-	-	-	80	ltrs
Mobil Mobilgear 630	-	-	-	-	20	ltrs
Petrol (ULP)	1203	3	-	II	25	ltrs
Degreaser	-	-	-	-	20	ltrs
LPG (liquefied petroleum gas)	1075	2.1	-	-	90	kgs
Kerosene	1223	3	-	III	40	ltrs
<b>STOREROOM</b>						
HiChem Quick Dry Spraying Enamel	1263	3	-	II	20	ltrs
Silastic 732 RTV Adhesive / Sealant	-	-	-	-	0.6	kg
CIGWeld Avesta Pickling Paste	1790	8	6.1	II	1	kg
Dy-Mark Line Marking Aerosol	1950	2.1	-	-	6.0	ltrs
Inox	1950	2.1	-	-	1	Kg
PVC Priming Fluid	1193	3	-	II	1.0	ltrs
PVC Pipe Cement	1193	3	-	II	0.5	ltrs
<b>TANK FARM</b>						
Ethanol	1170	3	-	II	1,150,000	ltrs
<b>TRUCK WASH</b>						
sodium hydroxide 70% solution	1824	8	-	II	400	ltrs

reduce

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

### 8 INCIDENT RESPONSE INFRASTRUCTURE AND EQUIPMENT

A crucial part of pre-planning for pollution incidents, which may arise on site, relates to having the necessary infrastructure and equipment.

That equipment should be focused around minimising the risk of harm to people and the environment as result of a pollution incident, and for containing or controlling a pollution incident.

In the event of an environmental spill, the management documentation and response equipment shall include, but not be limited to:

- Emergency Response Manual;
- SDS (available on Chemwatch);
- Drain plugging materials;
- Personal Protective Equipment;
- Extinguisher;
- List of key personnel;
- Spill response clean up kits; and
  - decontamination safety showers.

### 9 STAFF & CONTRACTOR INDUCTION

All employees and contractors will be made aware of their roles and responsibilities in the case of incidents during their induction.

### 10 STAFF TRAINING

In addition, regular training and instruction regarding this PIRMP must be conducted in accordance with legislative requirements.

All training records, including the name of the person undertaking training and the date of training, shall be maintained in compliance with legal requirements.

### 11 TESTING, REVIEW AND MAINTENANCE

Incident management will be included in the testing of our emergency response procedure, which occurs annually.

The testing of this PIRMP will be undertaken to check that the information is accurate and current, and that the plan is capable of being implemented in a workable and effective manner.

Testing shall be undertaken in the following ways:

- Initial testing will be either a desktop review or an environmental emergency drill procedure.
- Review of the PIRMP will occur every 12 months commencing from the date of
- authorisation; and
- The PIRMP will be reviewed within one month from the date of any pollution incident.

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN****12 REVIEW REGISTER**

Records are kept in accordance with legal requirements and will be included in the Review Register (see below) for this plan.

Information to be retained in relation to the PIRMP testing includes the:

- manner in which the test was undertaken;
- dates when the plan has been tested;
- person who carried out the testing; and
- date and description of any update of, or amendment to, the plan.

DATE OF TEST	NAME OF PERSONNEL UNDERTAKING TEST	MANNER OF TESTING	SUMMARY OF CHANGES (INCLUDE BRIEF DETAIL AND SECTION)	DATE OF UPDATE
30/11/2017	Scott Blenkiron Brett Wilson Terry Andrighetto Peter Ashby	Evac Drill	Nil	-
27/11/2018	Scott Blenkiron Brett Wilson Peter Ashby	Evac Drill Document Review – Section 7.5.1 - 7.5.3	Nil Add Emergency Pre-planning if Emergency Forecast	28/11/2018
30/09/2019	Peter Ashby	Desktop review	Nil	
12/11/2019	Scott Blenkiron Brett Wilson Peter Ashby	Evac Drill – tanker spill onsite	Nil	
17/02/2020	Scott Blenkiron Brett Wilson Peter Ashby	Evac Drill – gas leak	Nil	
13/05/2021	Scott Blenkiron Chris Buckton David Carey	Desktop review of manual	Update phone numbers on page 7, fix formatting errors, remove the word siren and replace with	05/08/2021
03/06/2021	Scott Blenkiron Brett Wilson	Evac Drill – fire in rubbish bin	Nil	
12/04/2022	Conrad Russo Scott Blenkiron	Review of content and change of template	Revise / update / correct all references, load into new template, correct formatting	12/04/2022

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

### 13 STAFF NOTIFICATION

#### When

A pollution incident is required to be notified if there is a risk of 'material harm to the environment'

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".

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.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

#### Who - If a Notifiable Pollution Incident Occurs Who Must Notify?

All employees and contractors working at the premises are responsible for alerting management to all environmental incidents or hazards.

Notification responsibilities as detailed in the POEO Act, can be categorised broadly as:

- the duty of an employee or any person undertaking an activity:
  - Any person engaged as an employee or undertaking an activity (at the premises) must, immediately after becoming aware of any potential incident, notify their relevant manager or employer of the incident and all relevant information about it; and
- the duty of the employer or occupier of a premises to notify:
  - An employer or occupier of the premises on which the incident occurs, must undertake notification to the appropriate regulatory authority of any "material harm incidents".

#### To Whom?

##### • INTERNAL NOTIFICATION

- Any person engaged as an employee or undertaking an activity (at the premises) must, immediately after becoming aware of any potential incident, notify their relevant manager or employer of the incident and all relevant information about it

'Immediately' is taken to mean 'promptly and without delay'.

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

- EXTERNAL NOTIFICATION**

The agencies listed in the table below are to be notified (in order), of the occurrence and details of a material harm incident immediately.

Pursuant to the guidance provided by the EPA, the decision on whether to report the incident should not delay immediate actions to ensure the safety of people or contain the pollution incident. However, incident notification will be made as soon as it is safe to do so.

**Refer Section 2 (Emergency Contacts)**

AGENCY	CONTACT DETAILS
Fire and Rescue	000 (To be contacted first in this order if the incident presents an immediate threat to human health or property and emergency services are required, or last in this order if emergency response is not required.)
RFS (Beelbanger)	6993 6988
MFS (Griffith)	6962 1223
EPA	131 555
Ministry of Health	(02) 9391 9000
Work Cover	13 10 50
Griffith City Council	1300 077

- Site Procedure**

In accordance with Incident Management, the actions to be implemented at the site following a material harm incident includes the following:

- Alert the site supervisor;
- Attempt to control spill when it is safe to do so, report to emergency Response Warden;
- Assign necessary response resources, (includes equipment and/or personnel) to minimise environmental impacts;
- Site Supervisor to notify
  - Production Manager;
  - CEO
  - relevant authorities

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

- Chief Warden – liaison functions to police, EPA and Ambulance;
- Arrange all management interaction with authorities, and community where necessary;
- CEO to manage Media responses
- Additional assistance;
- Situation controlled – Site Manager to debrief with all key personnel;
- Medical intervention – assessment of employee/community medical exposure, including the need for follow-up treatment; and
- Follow Hazard Incident Reporting procedure.

- **NOTIFICATION TO LOCAL LANDHOLDERS AND COMMUNITY**

- Notification of the surrounding community and land holders is a crucial consideration and action if they are at risk.
- Information to be provided to the community will include the following:
  - that an incident has occurred and what it is;
  - potential impacts to local landholders and the community;
  - site contact details; and
  - advice or recommendations based on the incident type and scale.
- The site will maintain contact with all neighbouring property owners that might be affected by the incident personally.

### 14 AMENDMENTS TO PIRMP

Changes to site and surrounds including

- site activities (where things are stored, new chemicals, new activities, etc.);
- to neighbours and surrounding land uses;
- in legislation and guidelines; and
- in personnel responsible for activities under this plan.

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

## 15 PIRMP COMPLIANCE WITH LEGISLATION

Below are the requirements of the relevant NSW legislation relating to PIRMPs and where those requirements are satisfied in this document.

SECTION 153C	REQUIREMENT	LOCATION IN THIS DOCUMENT
(a)	<p>The procedures to be followed by the holder of the relevant EPL in notifying a pollution incident to:</p> <ul style="list-style-type: none"> <li>• The owners or occupiers of premises in the vicinity of the premises to which the EPL relates, and</li> <li>• The local authority for the area in which the premises to which the EPL relates are located and any area affected, or potentially affected, by the pollution, and</li> <li>• Any persons or authorities required to be notified by Part 5.7 (of the POEO Act)</li> </ul>	<p>Section 12</p> <p>Section 12</p> <p>Section 12</p>
(b)	A detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant EPL to reduce or control any pollution,	Section 12c
(c)	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 12
(d)	<p>Any other matter required by the POEO (G) A Regulation (as set out below):</p> <p>98C (1)(a)</p> <p>A description of the hazards to human health or the environment associated with the activity to which the licence relates (the “relevant activity”).</p>	<p>Refer ERP (ManERP030)</p> <p>Section 4.2 to 4.13</p>
	<p>98C (1)(b)</p> <p>The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.</p>	<p>Refer ERP (ManERP030)</p> <p>Section 4.2 to 4.13</p>
	<p>98C (1)(c)</p> <p>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.</p>	Section 5



## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

<p><b>98C (1)(d)</b></p> <p>An inventory of potential pollutants on the premises or used in carrying out the relevant activity.</p>	Section 6
<p><b>98C (1)(e)</b></p> <p>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.</p>	Sections 6
<p><b>98C (1)(f)</b></p> <p>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.</p>	Section 7
<p><b>98C (1)(g)</b></p> <p>The names, positions and 24-hour contact details of those key individuals who:</p> <ul style="list-style-type: none"> <li>• are responsible for activating the plan, and</li> <li>• are authorised to notify relevant authorities under section 148 of the POEO Act, and</li> <li>• are responsible for managing the response to a pollution incident</li> </ul>	Section 3
<p><b>98C (1)(h)</b></p> <p>The contact details of each relevant authority referred to in section 148 of the POEO Act.</p>	Section 4
<p><b>98C (1)(i)</b></p> <p>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.</p>	Section 12d
<p><b>98C (1)(j)</b></p> <p>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.</p>	Refer ERP (ManERP030) Section 4.2 to 4.13

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

<p><b>98C (1)(k)</b> 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.</p>	<p>Section 3 and Refer ERP (ManERP030)  Section 4.2 to 4.13</p>
<p><b>98C (1)(l)</b> 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.</p>	<p>Section 5</p>
<p><b>98C (1)(m)</b> The nature and objectives of any staff training program in relation to the plan.</p>	<p>Section 9</p>
<p><b>98C (1)(n)</b> The dates on which the plan has been tested and the name of the person who carried out the test.</p>	<p>Section 10</p>
<p><b>98C (1)(o)</b> The dates on which the plan is updated.</p>	<p>Section 11</p>
<p><b>98C (1)(p)</b> The manner in which the plan is to be tested and maintained.</p>	<p>Section 11</p>