

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

**Shoalhaven Excavation &
Plant Hire Pty Ltd 7 Nowra
Hill Road South Nowra 2541**

Revision History

Revision	Date	Author/Reviewer	Details
Draft 1	15/02/2017	Neale Jones	For compliance

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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*.

Under the legislation referred to above, the Environment Protection Licence (**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.

This PIRMP applies to the Shoalhaven Excavation & Plant Hire waste and recycling facility that operates from 7 Nowra Hill Road South Nowra, as described in **Section 11**.

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

1. **Overview** – describes the purpose and review date for this PIRMP;
2. **Legislative requirements** – describes main features the applicable legislation governing the preparation and implementation of PIRMPs;
3. **Pollution incident** – definition;
4. **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;
5. **Inventory of potential pollutants and maximum quantities** – identifies the potential pollutants located on Site and the maximum quantities of the pollutants stored;
6. **Safety equipment** – identifies the safety equipment and devices on Site;
7. **Identifying and minimising risk of harm to persons on Site** – how Shoalhaven Excavation identifies and minimises risk to safety;
8. **Preparation and implementation of this plan** – identifies the people responsible for activating, maintaining and implementing this PIRMP;
9. **Notification of pollution incidents causing or threatening to cause material harm to the environment** – contact details and notification procedure;
10. **Emergency incident response procedures** – outlines the procedures to be followed in the event of an incident
11. **Map** – map of Site to show location of potentially affected neighbours and environmentally sensitive areas;
12. **Training** – information to be passed on to staff and contractors;
13. **Keeping and testing of PIRMP** – details for keeping the PIRMP and testing its content; and
14. **Appendix** – documents and forms referred to throughout the PIRMP.

1.1 Purpose

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.

The PIRMP will be implemented only if material harm to human health or the environment occurs or threatens to occur.

This Plan is to clearly define the requirements of Shoalhaven Excavation staff to report and respond to pollution incidents in accordance with the POEO Act 1997 and the POEO (General) Regulation 2010.

The Pollution Incident Register is used to record and monitor all environmental incidents within the South Nowra site. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept on the Site. A template of the Pollution Incident Register is provided at **Appendix A**.

The Site Operations Manager is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

2 LEGISLATIVE REQUIREMENTS

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 Licenses (**EPLs**).

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

TABLE 1: PIRMP Requirements

PIRMP Legislation covered under this Plan		Reference Section
POEO Act Part 5.7A		
153A	Duty of licence holder to prepare pollution incident response management plan	Whole document
153C	Information to be included in the plan	Whole document
153D	Keeping of the plan	13.1
153E	Testing of the plan	13.2
153F	Implementation of the plan	8
POEO (General) Regulation 2009		
98C(a)	Hazard assessment:	4
98C(b)	Likelihood assessment:	4
98C(c)	Pre-Emptive Action:	4
98C(d)	Pollutant Inventory Types:	5
98C(e)	Pollutant Inventory Quantities:	5
98C(f)	Safety Equipment:	6
98C(g)	Staff Contacts:	8
98C(h)	Authority Contact:	9

98C(i)	Early Warnings	9
98C(j)	Minimising risk of harm	7
98C(k)	Detailed map of site and surrounding area including location of potential pollutants and the location of stormwater collection dam	11
98C(l)	Detailed description of how any identified risk of harm to human health will be reduced	7
98C(m)	Nature and objectives of staff training in relation to plan	12
98C(n)	Dates on which the plan has been tested and name of person who carried out test	13
98C(o)	Dates on which the plan is updated	1.2
98C(p)	The manner in which the plan is to be tested and maintained	13
98D	Availability of plan	13

3 POLLUTION INCIDENTS

A *pollution incident* is defined as follows in the 'Environmental Guidelines: Preparation of pollution incident response management plans' prepared by the NSW Environment Protection Authority (**EPA**) in March 2012:

“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.”

4 HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS

Aussie Skips undertakes activities of receiving and sorting solid, inert building and demolition waste (including garden waste, household waste and e-waste) into recyclable and non-recyclable streams.

Notwithstanding Aussie Skips commitment to preventing pollution incidents on Site, it is not possible to prevent all situations that might give rise to such incidents.

4.1 Description of main hazards and the likelihood of hazards occurring

Table 2 details the requirements set out in clause 98C(1)(a), (b) and (c) of the POEO (General) Regulation.

Table 2: Description of hazards and the likelihood of occurrence of the Aussie Skips Site as well as pre-emptive actions to be taken.

Hazard Type (Human/ Environment)	Type	Description	Likelihood of hazard occurring*	Events that would increase likelihood of occurrence	Pre-emptive actions to be taken
Human and environment	Storage of chemicals	Hydrocarbon spill that reaches a drain, sewer or natural watercourse. Sources include but are not limited to; <ul style="list-style-type: none"> - Diesel fuel storage tank 	1	Failure to keep chemicals in a bunded area	Retain minimum quantities on Site Regular Site inspections Regular training of all staff
Human and environment	Storage of paints, Oils, solvents	Water pollution with oil, solvents or paint. Sources may include but are not limited to; <ul style="list-style-type: none"> - thinners - paint - turpentine - kerosene - methylated spirits - hydraulic oil - engine oil 	2	Failure to keep paints, oils and solvents in a bunded area	Retain minimum quantities on Site Regular Site inspections Regular training of all staff No use of paints, oils or solvents near

Hazard Type (Human/Environment)	Type	Description	Likelihood of hazard occurring*	Events that would increase likelihood of occurrence	Pre-emptive actions to be taken
					drains
Human and environment	Storage of waste materials	Land and water pollution with leachate.	3	Failure to remove waste promptly which causes a build up of waste	Retain minimum quantities on Site Regular Site inspections Regular training of all staff
Human and environment	Discharges to stormwater	Failure of stormwater management system	3	Failure to maintain stormwater system	Regular Site inspections Regular training of all staff
Human and environment	Air quality	Air pollution from dust Sources include but are not limited to; - Dust from waste storage - Vehicle movement	3	Hot, windy days Failure to maintain dust suppression sprinkler system	Regular Site inspections Regular training of all staff Wet down unsealed trafficable areas and maintain sediment systems Regular use of mechanical sweeper
Human	Noise	Operation of machinery and other processing equipment	3	N/A	Provision of ear plugs when requested
Human and environment	Gas leak and/or fire	Combustion of stockpiles of waste	1	Failure to properly maintain stockpiles	Regular observation of stockpiles to ensure they are

Hazard Type (Human/ Environment)	Type	Description	Likelihood of hazard occurring*	Events that would increase likelihood of occurrence	Pre-emptive actions to be taken
					managed appropriately. Regular training of all staff
Human and environment	Flood	Flooding due to heavy rains and/or failure of stormwater management system	3	Failure to maintain stormwater system	Regular Site inspections Regular training of all staff
Human and environment	Litter	From general use of Site	2	Failure to provide bins	Regular Site clean ups and inspections Regular emptying of bins

*See rating table below

Table 3: Rating of likelihood of incident occurring

Rating	Measure	Description
1	Rare	May occur only in exceptional circumstances
2	Unlikely	Could occur at some time
3	Possible	Might occur at some time
4	Likely	Will probably occur in most circumstances
5	Almost Certain	Is expected to occur in most circumstances

5 INVENTORY OF POTENTIAL POLLUTANTS & MAXIMUM QUANTITIES

The purpose of Section 5 is to provide an inventory of potential pollutants on Site in accordance with Clause 98C(1)(d) and (e) of the POEO (General) Regulation.

Table 4 identifies the main types of potential pollutants that are stored or used on the Site which could cause potential incidents. Table 4 further identifies the likely maximum quantity of each pollutant likely to be stored at the Site.

Table 4: List of Main Pollutants on Shoalhaven Excavation Site and maximum quantities

Description	Comments	Maximum quantity of pollutant likely to be stored on Site	Type of containment
Class 3 flammable liquids e.g. Fuels including petrol based fuels and	For plant and equipment operations.	Diesel fuel storage – 2,100 L tank	Bunded
Combustible Liquids (C1 & C2) Lubricants and hydraulic oils and other	For plant and equipment operations.	1 x 205 L engine oil drum 1 x 205 L hydraulic oil drum	Bunded
Leachate	From waste.	Nil.	N/A
Lead Acid batteries	Extracted from loads of waste	Nil	N/A
Other dangerous Goods classes e.g. <ul style="list-style-type: none"> Compressed gases 	Use of other dangerous goods varies on site. Oxy acetylene torch Argon shield for Mig Welder	1 x oxygen size G 1 x acetylene size G 2 x argon shield size G	Inside container tool shed
Wastes	Storage of wastes	60 tonnes	Hardstand
Waste oil	Waste oil generated from servicing machinery.	1 x 205 L drum	Bunded

Appendix E contains a survey labelled with the location of the potential pollutants identified in Table 4.

6 SAFETY EQUIPMENT

This section is provided in accordance with Clause 98C(1)(f) of the POEO General Regulation 2009.

Table 5 describes the safety equipment or other devices that are used to minimise the risks to human health or the environment and to control or contain a pollution incident.

Type of risk	Safety equipment or devices
Storage of chemicals	Bunding Spill kit
Storage of paints, Oils, solvents	Bunding Spill kit
Storage of waste materials	Bunding
Containment tanks	Bunding
Discharges of pollution to stormwater	Grated drain Silt arrestor
Air quality	Dust suppression sprinkler system Mechanical sweeper
Noise	Semi enclosed Processing Shed Ear plugs provided upon request
Gas leak and/or fire	Fire extinguishers Fire blanket
Flood	Grated drain Silt arrestor
Personal injury	Personal Protective Equipment including; <ul style="list-style-type: none"> - Gloves - High vis - Safety goggles - Hard hat - Contamination overalls - Closed in footwear First aid kit
Exposure to asbestos	Asbestos Personal Protective Equipment

7 IDENTIFYING AND MINIMISING RISK OF HARM TO PERSONS ON SITE

Aussie Skips is committed to minimising the circumstances where pollution incidents may occur.

Through the use of employee and sub-contractor training, routine inspections on the Site and the oversight of operations by the Site Operations Managers, Aussie Skips will be able to identify and respond appropriately to conditions that might lead to a pollution incident that causes risk to humans and the environment.

Aussie Skips employees and sub-contractors will be instructed regarding the step that should be taken to report and respond to Site conditions or issues that may result in pollution incidents. Further, employees and sub-contractors will be instructed on and provided with the appropriate personal protective equipment at all times.

Aussie Skips employees and sub-contractors will also be instructed in appropriate pre-emptive steps that they should take to minimise or prevent risk of harm to human health or the environment arising from a potential pollution incident.

Aussie Skips employees and sub-contractors will be instructed to contact the Site Operations Manager **immediately** if they are in doubt over any part of this PIRMP or their responsibilities.

8 PREPARATION AND IMPLEMENTATION OF THIS PLAN

8.1 Implementation of this Plan

If a pollution incident occurs so that material harm to the environment is caused or threatened, this Plan must **immediately** be implemented.

Under section 147 of the POEO Act, **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).

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.

It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

The following summarises the various key personnel responsible for and authorised to activate this plan and notify the relevant authorities and manage the response to the pollution incident.

Contact a Site Operations Manager as soon as material harm to the environment is caused or threatened.

Position	Name	Phone	Email
Site Operations Manager	Daniel Jones	0412 348 976	Shoalex.dan@gmail.com
Site Operations Manager	Neale Jones	0419 244 550	Est.shoal@bigpond.com

9 NOTIFICATION OF POLLUTION INCIDENTS CAUSING OR THREATENING TO CAUSE MATERIAL HARM TO THE ENVIRONMENT

9.1 Notification contact details

Under *Part 5.7 of the POEO Act*, there is a duty to notify each relevant authority (identified below) of a pollution incident, where material harm to the environment is caused or threatened.

Material harm includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential loss (refer definitions) or property damage of an amount over \$10,000.

Relevant authorities' notification order

If there is an immediate threat to human health or the environment:

Call Fire and Rescue first

000

The Operations Manager will continue the next calls.

EPA	131 555
WorkCover	131 050
Local Authority (Shoalhaven city Council)	02 44293111

If there is not an immediate threat to human health or the environment:

Call EPA first	131 555
WorkCover	131 050
Local Authority (Shoalhaven City Council)	02 44293111
Fire and Rescue NSW (Pollution incident notification hotline)	1300 729 579

9.2 Incident notification procedure

In the event of an emergency Shoalhaven Excavation will notify the relevant authorities and provide regular updates to the authority and any other person (including neighbours) who is deemed relevant to be notified and kept updated. Aussie Skips will contact the relevant departments and people as soon as possible.

Incidents such as small chemical spills or minor individual medical emergencies will not generally require notification to incident response agencies. However, **ALL** incidents will be notified immediately to the Site Operations Manager so that an assessment of the level of response required can be determined.

10 EMERGENCY INCIDENT RESPONSE PROCEDURES

10.1 Procedure to be followed in the event of a pollution incident

1. All necessary action should be taken to minimise the size and any adverse effects of the release of the pollution. For example, sand bagging, application of a spill kit, turning of equipment at power source, construction of a temporary bund.
2. If the incident presents an immediate threat to human health or property, Fire & Rescue NSW, the NSW police and the NSW Ambulance Service should be contacted for emergency assistance. Phone **000**.
3. At an appropriate time, a staff member will record the incident in the PIRMP Incident Form provided at **Appendix B**.
4. As soon as possible during the incident that threatens or causes material harm to the environment, the Site Operations Manager will notify the relevant authorities and people identified in **Section 9**.
5. All records of the pollution incident will be retained for future references.
6. The PIRMP will be reviewed and updated as appropriate.

10.2 Procedure to be followed for Combating the Pollution Caused by a Spill Incident

Spill incidents are the most likely incident to occur at the Aussie Skips Site.

For incidents involving material harm, the fire brigade or Hazmat would combat the pollution caused by a spill incident and become the emergency controller.

Pollution incidents - Spills

A spill can be the release of any chemical or substance (i.e. – production, waste waters, oil, and fuel) that may potentially enter stormwater, creeks, rivers, ground water or contaminate soil.)

The POEO Act definition of a pollution incident is:

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.

Clean-up Action

All pollution incidents are required to be acted upon immediately. This is a separate action to that of notification. Where possible both should be undertaken concurrently.

POEO Act definition of "clean-up action", in relation to a pollution incident, includes:

- (a) action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and
- (b) ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and
- (c) preparing and carrying out a remedial plan of action.

It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

11 MAP

The purpose of **Figure 1** is to provide a detailed map showing the location of the Site (outlined in yellow) and the surrounding areas that may be affected by a pollution incident.



12 TRAINING

All employees and sub-contractors working on Site will be trained in accordance with this PIRMP.

The objectives of training shall be as follows:

- a) To ensure that the employee or sub-contractor obtains sufficient knowledge in respect of their role and responsibilities detailed in this PIRMP.
- b) To ensure that the employee or sub-contractor obtains sufficient knowledge of the PIRMP's procedures to affect a safe and appropriate response to pollution incidents.

Training will be refreshed annually. A record of training will be kept by Aussie Skips. A template for the training record is provided at **Appendix C**.

13 KEEPING AND TESTING OF PIRMP

13.1 Keeping of this Plan

This Plan will be kept at the Aussie Skips premises and made available to;

- An authorised officer upon request;
- Any person who is responsible for implementing the Plan.

A copy of a Plan will also be made available on the Aussie Skips website available at <http://www.aussieskips.com.au/>.

13.2 Testing of this Plan

This Plan will be tested in a manner so as to ensure that the information included in the Plan is accurate and up to date and to ensure that the Plan is capable of being implemented in a workable and effective manner.

The Plan will be tested:

- at least once every 12 months (on the anniversary of this Plan); AND
- within 1 month of any pollution incident so as to assess, in 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.

Aussie Skips will keep a record of the tests on the form provided in **Appendix D**.

This Plan will be updated immediately following any test that is carried out on the Plan.

14 APPENDIX

- A. Pollution Incident Register**
- B. PIRMP Incident Form**
- C. PIRMP Training Record**
- D. PIRMP Testing Register**
- E. Survey of Site showing location of potential pollutants, stormwater drains, bunding and spill kits**

**APPENDIX A
POLLUTION INCIDENT REGISTER**

**APPENDIX B PIRMP
INCIDENT FORM**

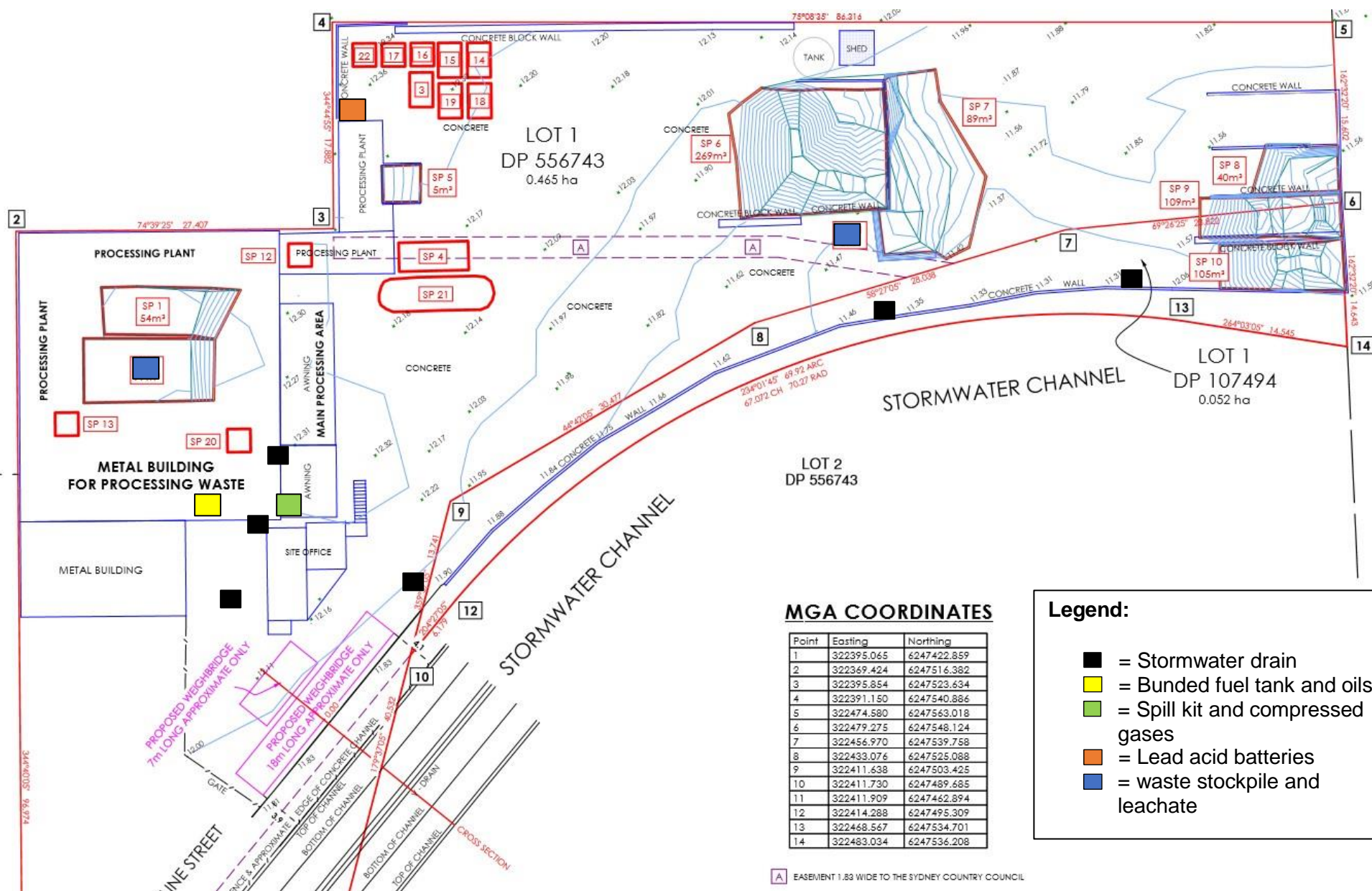
PIRMP INCIDENT FORM

Date of incident	Details
Time of incident	
Name of reporting person	
Location of incident	
Type of incident	
Quantity of material involved	
Actions initiated in response to incident	
Notified authorities	
Other notified persons	
Other matters	
Management acknowledgment	
Name of person completing this form	
Date	
Signature	

**APPENDIX C
TRAINING RECORD**

**APPENDIX D
PIRMP TESTING REGISTER**

APPENDIX E
SURVEY OF SITE SHOWING LOCATION OF POTENTIAL POLLUTANTS, STORMWATER DRAINS, BUNDING AND SPILL KITS



MGA COORDINATES

Point	Easting	Northing
1	322395.065	6247422.859
2	322369.424	6247516.382
3	322395.854	6247523.634
4	322391.150	6247540.886
5	322474.580	6247563.018
6	322479.275	6247548.124
7	322456.970	6247539.758
8	322433.076	6247525.088
9	322411.638	6247503.425
10	322411.730	6247489.685
11	322411.909	6247462.894
12	322414.288	6247495.309
13	322468.567	6247534.701
14	322483.034	6247536.208

Legend:

- = Stormwater drain
- = Bunded fuel tank and oils
- = Spill kit and compressed gases
- = Lead acid batteries
- = waste stockpile and leachate

A EASEMENT 1.83 WIDE TO THE SYDNEY COUNTRY COUNCIL