# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

**Nick Farrell** 

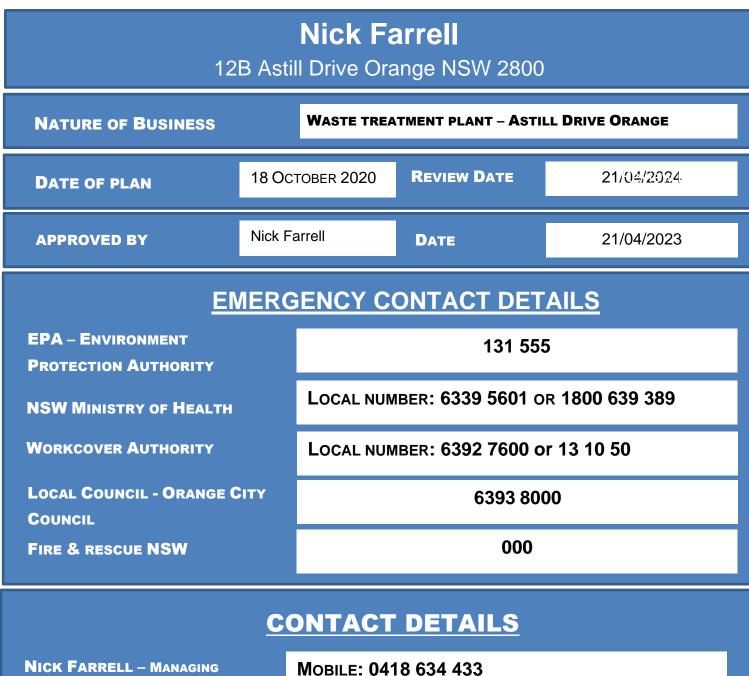
**Treatment Plant** 

12B Astill Drive Orange NSW

LAST UPDATED

21/04/2023

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DIRECTOR

**ANNA FARRELL –WIFE** 

MOBILE: 0419 613 400

**EPA LICENSE NUMBER:** 

**21181- TREATMENT PLANT ASTILL DRIVE** 

#### **DUTY TO REPORT A POLLUTION INCIDENT**

Under the POEO Act a duty to immediately report an incident applies where a pollution incident occurs in the course of treating waste so that material harm to the environment is caused or threatened. It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Harm to the environment is material if:

- It involves actual or potential harm to the health or safety of human beings or to the ecosystems that is not trivial, or
- 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 it prescribed by the regulations.

Leaks, spills, water discharges and other pollution incidents can harm the environment. The relevant regulatory authorities need to be informed of pollution incidents immediately, so that action can be coordinated to prevent or limit harm to the environment. Regulatory authorities' and notification responsibilities are given below.

### NOTIFICATION

#### **Regulatory Authority**

Pollution incidents posing material harm to the environment must be notified to the Environmental Protection Authority.

If in doubt as to who to notify, ring EPA's Pollution Line 131 555

The relevant information about a pollution incident required to be reported consists of the following:

- 1. The time, date, nature, duration and location of the incident
- 2. The location of the place where the pollution is occurring or is likely to occur
- 3. The nature, the estimate quantity and volume and the concentration of an pollutants involved.
- 4. The circumstances in which the incident occurred (including the cause of the incident, if know)
- 5. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution

If the information required by items (3) to (5) become known after the initial notification is made, that information must be provided to the authorities immediately after it becomes known.

#### **Emergency Services**

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If adequate resources are not available to contain the release and if it threatens public health, property or to the environment, the NSW Fire Brigades should be contacted for emergency assistance – phone 000.

In addition, if advice is needed on cleaning-up the incident or on the disposal of any resulting waste materials, EPA staff can be contacted 24-hours/day via Pollution Line on 131 555. If the NSW Fire Brigades are called, they may notify the EPA if they consider the environment or public health to be threatened. Notification by the NSW Fire Brigades does not negate the need for person carrying on the activity or the occupier of the premises to notify the EPA.

#### **Emergency Services**

Any activities that have contaminated land or owners of land who become aware that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination, if the contamination meets certain criteria. The duty to notify is a requirement under section 60 of the Contaminated Land Management Act 1997 (CLM Act.)

#### **NOTIFICATION RESPONSIBILITIES**

#### Responsibilities

Under the POEA Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment.

- The person carrying on the activity;
- An employee or agent carrying out the activity;
- An employee carrying on the activity; and
- The occupier of the premises where the incident occurs.

Nick Farrell must be notified immediately after the person becomes aware of the incident. Nick will then be the point of contact for notifying all relevant regulatory authorities.

An incident does not require notification if the regulatory authorities has already been notified by another party.

#### **INCIDENT RESPONSE AND NOTIFICATION PROCEDURES**

Below is a step by step procedure for notifying pollution incidents at the Treatment Plant.

- 1. Access the situation and if safe to do so, immediately rectify the pollution source and control the migration of any pollution. Ensure access routes for spills to any surrounding drains or waterways are blocked.
- 2. Immediately notify Nick Farrell of the pollution incident, giving details such as location, volumes of pollutants and circumstances of the incident. If the incident is not able to be contained, notify the emergency services to aid in control of the incident.
- 3. If deemed to be required, Nick Farrell or an elected representative will immediately notify the EPA giving the details as listed above.
- 4. If information regarding the incident becomes known after the initial notification is made, that information will be provided to the authorities immediately after it becomes known by Nick Farrell or the elected representative.
- 5. Any follow up reports required will be submitted to the EPA by Nick Farrell within the given timeframes. This reporting will detail results of investigation, corrective and preventative actions and will include the following details:
  - The cause of the incident
  - Any environmental harm or potential harm caused
  - Actions that have been undertaken to rectify, reduce or remediate the pollution incident
  - Responsibilities for the incident, and
  - Actions to be implemented to avoid repeat occurrences of a similar incident.

#### **RESPOND IMMEDIATELY TO LIQUID WASTE SPILLS**











#### **COMMUNITY NOTIFICATION**

All community notification associated with pollution incidents will be directed as needed by Nick Farrell and responsible people will notify and co-ordinate with the affected community members. The following mechanisms appropriate to the circumstance may be adopted to notify and update the surrounding community of an incident:

- Local media sources;
- Telephone calls, letterbox drop or doorknocking (where appropriate)

#### HAZARDS AND PRE-EMPTIVE ACTIONS

Nick Farrell will provide identification and notification of hazards that may affect environmental and human health. When a hazard has been identified, a risk management plan will follow that will include a hazard assessment, control and management. All environmental incidents will be communicated immediately to Nick Farrell.

An incident and major hazard risk assessment is contained in Appendix B, including pre-emptive action and controls associated with each of the major incidents and hazard assessed.

Other pre-emptive action taken to minimise the risk of harm to all persons on the premises include:

- Regular inspections and recording and close out of corrective action
- Hazard and near miss reporting

### SAFETY EQUIPMENT

All equipment, controls, incident response plans and management plans will be maintained to prevent any possible harm to human health and the environment. Inspection, testing and review of equipment, controls, documents and systems currently in place at the worksite will depend on issues raised for concern and results from previous checks.

Safety equipment location within the site compounds are identified on the maps (page 8):

#### SAFETY EQUIPMENT – CONTINUED

Treatment Plant

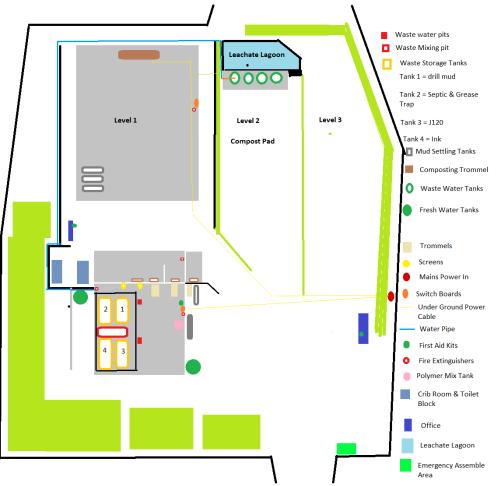
- Fire extinguishers are located on the wall and all site trucks on site.
- First Aid Kit located within the Emergency Response Kit inside the shed and mobile kits with all trucks on site.
- Spill kits located within the Emergency Response Kit and with all trucks on site
- MSDS's are kept in the Emergency Response Kit
- PPE store is located in Emergency Response Kit and within all trucks on site

Task specific safety equipment will be described in the Safe Work Method Statement for each task.

### **SITE PLAN** –**TREATMENT Plant**

12B ASTILL DRIVE ORANGE NSW

Updated 21/04/2023



This is a proposed site map for 12B Astill Drive



#### **ORGANISATIONAL CHART**

NICK FARRELL MANAGING DIRECTOR 0418 634 433

OTHER CONTACTS: ANNA FARRELL -- 0419 613 400

Updated 21/04/2023

# **PREPARE, TEST AND MAINTAIN**

After preparation of this PRIMP, it is to be tested via a mock pollution incident to ensure personnel are aware of the processes and responsibilities on site. All testing of this plan and any supplementary amendments that are made are to be documented and stored in the site office files and may be requested by the EPA at any time.

A PRIMP Test Tracking spread sheet can be seen in Appendix A. The PRIMP will be reviewed and maintained to ensure information in the plan is accurate and up to date. The review process will occur every 12 months and within one month of any pollution incident occurring. This will ensure any issues within the plan are identified and revised.

# **STAFF TRAINING**

Individual training needs are identified thru the completion of a training needs assessment. Training consists of a combination of on-the-job product or activity specific training. Appropriate training records are maintained for all workers and retained for an indefinite period.

All workers are given Work, Health & Safety, Quality and Environmental training using the WH&S Manual Policies and Procedures, "Company Induction" booklet, Safe Work Method Statements and Industry training. All workers are trained in environmental issues.

Additionally, all managers, supervisors and staff will be trained in progressively throughout each year. Toolbox talks will be presented to educate workers of preventative actions, controls, PIRMP updates, site issues and environmental pollution incidents involved on site or in a truck.

#### **Emergency Spill Response Training**

Nick Farrell has consulted the local NSW Fire Brigade and has had an evaluation of the waste storage and treatment facility. Improvements made following the evaluation include labelling of the waste storage tanks for easy identification in case of a spill. The labels included the emergency phone numbers as required in the Pollution incident response management plan. The local fire brigade will be issued with a copy of the Pollution incident response management plan and a list of the waste stored onsite.

# APPENDIX A PIRMP TEST TRACKING SPREADSHEET

<b>PIRMP</b> Test Re	eference Tracking			
PIRMP Test Date	Personnel Involved	Position	Responsibility	Amendments Required
0 <u>5/09/2022</u>	NICK FARRELL	DIRECTOR		
	James Angus			
	Tim Harris			
	Mark Turner			
	Mitchell Lucas			
	Sam Thomas			
	Aisalce Bullion			
	Rodney Raines			
	Jacob Brown			
	John Turner			
	Nathan Morrison			
	Chris Dickerson			
	Trevor Croker			
	Adam Croker			
2 <u>4/4/2023</u>	M <u>ark Turner</u>			
	GLEN MCDONALD			
	STACEY SHERWOOD			
	Scot Dreyer			
	Terry Dixon			
	Nathan Morrison			
	Jacob Brown			
	David Tompkins			
	Adam Croker			
	Sam Thomas			
	Jessy Wensley			
	John Turner			
	Nick Farrell			
	Rodney Raines			

Updated 21/04/2023

# APPENDIX B MAJOR HAZARD AND INCIDENT RISK ASSESSMENT

Trade name	Description	Method of Storage	Potential hazard	Risk	Controls	Risk after controls implemented
Septic Waste	Septic tank pump out waste	Tank in bunded area at waste treatment facility	Spillage due to leaking tank	2	Regular maintenance checks of tanks. Waste kept in bunded area inside shed. If leak occurs it will be contained in the concrete bunded area	3
Grease trap Waste K110	Waste from a grease interceptor used for the capture of food grease and solids	Tank in bunded area at waste treatment facility	Spillage due to leaking tank	2	Regular maintenance checks of tanks. Waste kept in bunded area inside shed. If leak occurs it will be contained in concrete bunded area	3
Bio filter waste	The biofilter waste water from the MSM Milling Pty Ltd Canola Plant at Manildra	Tank in bunded area at waste treatment facility	Spillage	2	Regular maintenance checks of tanks. Waste kept in bunded area inside shed. If leak occurs it will be contained in concrete bunded area	3
Waste Oil/water, hydrocarbons/water mixtures or emulsions J120	Oil-water separator Waste	Storage tank in bunded area located at waste treatment plant	Spillage	2	Regular maintenance checks of tanks. Waste kept in bunded area inside shed. If leak occurs it will be contained in concrete bunded area	3

Waste from the production, formulation & uses of inks, dyes, pigments, plants,	Paint sludge	Stored in approved container in bunded area	Spillage	2	Regular maintenance checks of approved containers. Waste kept in bunded area inside shed. If leak occurs it will be	3
lacquers & varnish F100					contained in concrete bunded area	
Drilling Mud and/or muddy waters from drilling operations	Drilling mud and/or muddy waters from mineral exploration or other directional drilling but not including drilling mud and/or muddy waters from coal or coal seam gas exploration	Stored in approved container	Spillage	2	Regular maintenance checks of approved containers.	3

Waste Cooking Oil	Cooking oil from cafes and Hotels	Stored in approved container	Spillage	2	Regular maintenance checks of approved containers	3
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	APPENDIX B (CONTIN RISK MATRIX	UED)			
H (1) (High level of harm)	Potential death, permanent disability or major structural failure/damage. Off-site environmental discharge/release not contained and significant long-term environmental harm.	H (1) <i>(High)</i>	1	1	2
M(2) (Medium level of harm)	Potential temporary disability or minor structural failure/damage. On-site environmental discharge/release contained, minor remediation required, short-term environmental harm	M (2) (Medium)	1	2	3
L (3) (Low level of harm)	Incident that has the potential to cause persons to require first aid. On-site environmental discharge/release immediately contained, minor level clean up with no short-term environmental harm.	L (3) (Low)	2	3	3
Level	Likelihood / Probability				
Likely	Could happen frequently				
Moderate	Could happen occasionally				
Unlikely	May occur only in exceptional circumstances				

# APPENDIX C

#### **EMERGENCY PREPAREDNESS AND RESPONSE**

Type of emergency	Preparation for Emergency	Response to the Emergency
Minor spill of hazardous or toxic substance (<20L)	Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction MSDS on site for all materials and kept up to date Adequate supply of absorbent materials available in the workshop, storage and treatment plant and in trucks at work location	Report spills immediately to Nick Farrell Attempts to be made to limit or contain the spill using sand bags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill. Nick Farrell to coordinate the response, clean up and disposal of the material. Material to be disposed of in accordance with the manufacturers' recommendations and applicable legislation.
Major spill of hazardous or toxic substance (>20L)	Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction MSDS on site for all materials and kept up to date Adequate supply of absorbent materials available in the workshop, storage and treatment plant and in trucks at work location Emergency telephone numbers prominently displayed around workshop & issued to supervisors	<ul> <li>Report spills immediately Nick Farrell</li> <li>Attempts to be made to limit or contain the spill using sand bags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill, righting overturned containers, transferring remaining material.</li> <li>Nick Farrell to coordinate the response, clean up and disposal of the material.</li> <li>If the spill is regarded to be outside the onsite resources, then the fire brigade should be called.</li> <li>When appropriate, evacuation procedures are to be implemented to remove non-essential personnel from the affected area</li> <li>Emergency response members are consulted.</li> <li>Access and egress to the area is established to ensure the appropriate vehicles have effective access and congestion is minimised.</li> <li>If the fire brigade attends, their senior officer assumes control of the operations with Nick Farrell and subcontractor personnel assisting as required.</li> <li>A full investigation report of the event is to be completed by Nick Farrell as soon as practicable after the area has been secured.</li> </ul>

Type of emergency	Preparation for Emergency	Response to the Emergency
Flood	Remove plant and equipment from low lying areas. If plant cannot be removed ensure it is secured and in a position where it is unlikely to cause damage. Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction. Monitor flood warnings Maintain high standard for erosion and sedimentation controls	<ul> <li>Stow all minor and small equipment into containers that are to be sealed or on pallet racking</li> <li>Ensure all other materials and plant are either removed from flood affected areas or stowed and secured.</li> <li>All chemicals, fuels and other hazardous substances to be secured containers and stored within a sealable shipping container or on pallet racking</li> <li>Ensure that construction materials and rubbish does not leave the site</li> <li>Check effectiveness of erosion and sedimentation devices and other flood controls.</li> </ul>
Severe Storm/High Wind / Dust generations	Daily on site weather monitoring Awareness training of appropriate response and procedures to be incorporated into the Environmental and Safety Induction Ensure First Aid supplies are well stocked and adequate	Dust controls in place including wetting down exposed areas, application of soil binding polymer, fencing and barriers around contaminated areas. Stop work if conditions are generating dust If plant cannot be removed ensure it is secured and in a position where it is unlikely to cause damage. Stow all minor and small equipment into containers, which are to be sealed or on pallet racking All chemicals will be in secured containers and stored within a sealable shipping container or on pallet racking
Fire (Other than bushfire)	Awareness training of appropriate response and procedures to be incorporated into the Environmental and Safety Induction Fire extinguishers maintained, clearly labelled and distributed around depot and trucks Training in the use of fire extinguishers and which one to use for each type of fire First Aid supplies are stocked and adequate	For small fires, attempts to be made to extinguish the fire or limit its spread with available fire extinguishers or water hoses if appropriate. Nick Farrell to be informed immediately Nick Farrell to contact external services where necessary (fire, ambulance) as a precautionary measure. All personnel in the vicinity to be assembled in the Evacuation Assembly Area and a head count performed. Any resulting fuel or chemical spill to be handles as detailed above. Supervisor to coordinate with emergency services and provide assistance as required.