



NSW Pollution Incident Response Management Plan (PIRMP)

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INTRODUCTION

This Pollution Incident Response Management Plan (PIRMP) has been completed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009. This plan replaces the document titled “Emergency Response Procedures – Energy Developments NSW Power Stations” previously published on the EDL website.

This PIRMP references existing plans and systems used in EDL and applies to all EDL Power Stations located in New South Wales:

- Appin – Environmental Protection Licence (EPL) 5482
- Belrose – EPL 5180
- Cullerin – EPL 20430
- Eastern Creek – EPL 10042
- Glennies Creek – EPL 12614
- Grange Avenue – EPL 13337
- Jacks Gully – EPL 10021
- Lucas Heights 1 – EPL 4805
- Lucas Heights 2 – EPL 6345
- Tahmoor – EPL 11768
- Tower – EPL 5357

This PIRMP will be tested annually on site and within one month of a pollution incident, and will be updated as required in case of changes in scope or as a result of the annual testings.

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Protection of the Environment Operations Act 1997 – Sect 153 C Requirements	EDL Reference
153C Information to be included in plan	
<p>A pollution incident response management plan must be in the form required by the regulations and must include the following:</p> <p>(a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:</p> <p>(i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and</p> <p>(ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and</p> <p>(iii) any persons or authorities required to be notified by Part 5.7,</p>	<p>The name, positions and 24-hour contact details of personnel responsible in cases of a pollution incident are located in the “Emergency Response Procedures” document which is accessible via the SharePoint system and is also available in hard copy at each site.</p> <p>The contact details of each relevant authority is located in the "Regulator Contact Sheet" which is located and accessed via the SharePoint EDL system.</p> <p>Contact details are also contained within the “Emergency Response Procedures” document for each site.</p> <p>The ‘Emergency Response Procedures’ document establishes responsibilities regarding who coordinates all communication with the relevant authority within the legislative timeframes.</p> <p>The “Emergency Response Procedures” document, establishes responsibilities about who handles or organises communication with adjacent businesses.</p>
<p>(b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution,</p>	<p>The EDL Spill Response Procedure HSEQ-1610357324-539 addresses actions to be taken immediately after a spill event.</p> <p>The Environmental Incident Response procedure within the “Emergency Response Procedures” document addresses actions to be taken immediately after an environmental incident.</p>
<p>(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,</p>	<p>The name, positions and 24-hour contact details of personnel responsible in cases of a pollution incident are located in the “Emergency Response Procedures” document which is accessible via the SharePoint system and is also available in hard copy at each site.</p> <p>The Environmental Incident Response procedure is also located in the “Emergency Response Procedures” document.</p> <p>The EDL Spill Response Procedure HSEQ-1610357324-539 addresses actions to be taken immediately after a spill event, including when to call for external assistance.</p>

Protection of the Environment Operations Act 1997 – Sect 153 C Requirements	EDL Reference
	The contact details of each relevant authority is located in the "Regulator Contact Sheet" which is located and accessed via the SharePoint EDL system. The site specific "Emergency Response Procedures" document establishes responsibilities regarding who coordinates all communication with the relevant authority within the legislative timeframes
(d) any other matter required by the regulations.	Refer to table: <i>Protection of the Environment Operations (General) Regulation 2009 Part 3A</i> .

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
98A Definition	
In this Part: "plan" means a pollution incident response management plan required to be prepared under Part 5.7A of the Act.	NA
98B Form of plan	
(1) A plan is to be in written form	This plan and related information is in written form.
(2) A plan may form part of another document that is required to be prepared under or in accordance	The content of this plan is addressed in several documents and systems from EDL. References are mentioned in this table.
98C Additional matters to be included in plan	
(1) General The matters required under section 153C (d) of the Act to be included in a plan are as follows:	This section is included in the "Emergency Response Procedures" document for each site located on site and also accessed via the SharePoint EDL system.
(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity"),	
(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	This section is included in the "Emergency Response Procedures" document for each site located on site and also accessed via the SharePoint EDL system.
(c) 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,	This section is included in the "Emergency Response Procedures" document for each site located on site and also accessed via the SharePoint EDL system.

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Inventory of chemical substances including SDS per site is located in "ChemAlert" and in hard copy on site.
(e) 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,	Inventory of chemical substances per site is located in "ChemAlert", this includes quantities and location.
(f) 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,	Each site has fire extinguishers, spill kits, PPE, first aid kits and showers. These items are checked monthly using the HSE Monthly Inspection Checklist. The "Emergency Response Procedures" document contains a site drawing identifying safety equipment locations.
(g) the names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the plan, and	The name, positions and 24-hour contact details of personnel responsible in cases of a pollution incident are located in the site specific "Emergency Response Procedures" document which is accessible via the SharePoint system and is also available in hard copy at each site.
(ii) are authorised to notify relevant authorities under section 148 of the Act, and	
(iii) are responsible for managing the response to a pollution incident,	
(h) the contact details of each relevant authority referred to in section 148 of the Act,	Contact details of each relevant authority are contained within the "Emergency Response Procedures" document for each site.
(i) 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,	The "Emergency Response Procedures" document establishes responsibilities about who handles or organises communication with adjacent businesses.
(j) 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,	Every person required to enter each site is inducted on the risks on site and required PPE. In addition, the "Emergency Response Procedures" document for each site includes the evacuation procedure for any person who are on premises in case of an emergency.
(k) 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,	This map is attached to the "Emergency Response Procedures" document for each site.

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
(l) 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,	The EDL Spill Response Procedure HSEQ-1610357324-539 addresses actions to be taken immediately after a spill event, including determining if a spill situation is too hazardous for site personnel to manage. The “Emergency Response Procedures” document for each site contains actions to be taken after an environmental incident occurs, and the Evacuation Procedure to follow in the event of an emergency.
(m) the nature and objectives of any staff training program in relation to the plan,	Relevant staff are trained in spill response in the environmental training module: Spill Response Training, and site specific procedures are outlined at site specific inductions. The EDL Spill Response Procedure HSEQ-1610357324-539 addresses actions to be taken immediately after a spill event.
(n) the dates on which the plan has been tested and the name of the person who carried out the test,	The dates and name of the person who carried out the test is managed via the EDL Compliance Task Register located in the SharePoint EDL system.
(o) the dates on which the plan is updated,	The date this plan was published is located on the cover page of this document.
(p) the manner in which the plan is to be tested and maintained.	The testing and maintenance of this document is mentioned in the introduction section of this document.
98D Availability of plan	
(1) A plan is to be made readily available: (a) to an authorised officer on request, and (b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.	A printed copy of the “Emergency Response Procedures” document is available at each site. This PIRMP is also available via the SharePoint system from EDL and available via EDL website. The EDL Spill Response Procedure HSEQ-1610357324-539 is also available via the SharePoint EDL system.
(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared: (a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan, (b) if the person does not have such a website-by providing a copy of the plan, without charge, to any person who makes a written request for a copy.	

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
(3) Subclause (2) applies only in relation to that part of a plan that includes the information required under: (a) section 153C (a) of the Act, and (b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).	
(4) Any personal information within the meaning of the <i>Privacy and Personal Information Protection Act 1998</i> is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).	Personal information is not included in this plan.
98E Testing of plan	
(1) The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.	The HSE monthly inspection checklist contains a list of items to ensure the information is accurate and up to date. The testing frequency of this plan is managed via the EDL Compliance Task Register and it is specified in the Introduction section of this plan. Testing of the plan is undertaken utilising the Emergency Response Exercise Record HSEQ-1610357324-193.
(2) Any such test is to be carried out: (a) routinely at least once every 12 months, and (b) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the 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.	The testing frequency of this plan is managed via the EDL Compliance Task Register and it is specified in the Introduction section of this plan.