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NSW Pollution Incident Response Management Plan (PIRMP)

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1. 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, developed using the NSW EPA Guideline: Pollution Incident Response Management Plans.

This PIRMP is an index document referencing existing plans and systems used in EDL which meet the requirements of the POEO Act (1997) and Regulations (2009). This PIRMP applies to the licensees listed in Table 1.

Table 1: Licensees and Facilities Covered by PIRMP

Licensee	Facility
EDL CSM (NSW) PTY LTD	<ul style="list-style-type: none"> Appin CSM Power Station – Environmental Protection Licence (EPL) 5482 Tower Power Station – EPL 5357 Mandalong Power Station – EPL 21230
EDL (TT) PTY LTD	<ul style="list-style-type: none"> Tahmoor Power Generation Plant – EPL 11768
EDL (OCI) PTY Limited	<ul style="list-style-type: none"> Glennies Creek WCMG Power Station - EPL 12614
EDL LFG (NSW) PTY LTD	<ul style="list-style-type: none"> Eastern Creek Waste Management Centre – EPL 10042 Grange Avenue Power Station – EPL 13337 Jacks Gully Waste Management Centre – EPL 10021 Lucas Heights 1 LFG Power Station – EPL 4805 Lucas Heights 2 LFG Power Station – EPL 6345
Cullerin Range Wind Farm PTY LTD	<ul style="list-style-type: none"> Cullerin Range Wind Farm – EPL 20430

2. Testing Frequency

This PIRMP will be tested annually on site and within one month of any pollution incident occurring. Testing may be via a desktop exercise or scenario, or a practical exercise or drill.

3. Document Revision History

The plan will be reviewed annually and updated as required in case of changes in scope, due to findings from an event where the PIRMP is activated, or the annual testing.

Table 2: Document Revision History

Item	Details
Current version	9.0
Current document number	HSEQ-125008896-8
Previous document	Emergency Response Procedures – Energy Developments NSW Power Stations
Description of changes	<p>Revision 9: Formatting changes, removed Belrose</p> <p>Revision 8: Update following review</p> <p>Revision 7: Updating document metadata</p> <p>Revision 6: Review of plan against updated PIRMP guideline.</p> <p>Revision 5: Update following review</p> <p>Revision 4: Update following review</p> <p>Revision 3: Update following review. Document number change.</p> <p>Revision 2: Update following review</p> <p>Revision 1: PIRMP new format</p>

4. Definitions

- **ChemAlert:** Chemical safety management system for regulatory SDS compliance. ChemAlert can be accessed through the EDL SharePoint page.
- **Emergency Response Procedures:** A site specific document containing a list of procedures to be followed in the event of a particular emergency, and the contact details of relevant local authorities who are required to be contacted in the event of an emergency. The document also lists the names and contact details of those EDL employees responsible for implementing the emergency procedures and contacting necessary authorities. The Emergency Response Procedures document for each site can be accessed through the EDL SharePoint page and is printed and available in a hard copy at each site.
- **Pollution incident:** 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.
- **SAM:** EDL's online incident, risk and action plan management system which can be accessed via desktop and mobile application.
- **SharePoint:** SharePoint is EDL's secure, internal web-based collaborative platform utilised for document management and storage.

5. Pollution Incident Response Management Plan

Protection of the Environment Operations Act 1997 – Sect 153 C Requirements	EDL Reference
<p>153C Information to be included in plan</p> <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 site specific 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 are in the Regulator Contact Sheet which is located and accessed via the SharePoint EDL system.</p> <p>Contact details for Ministry of Health, SafeWork NSW, the local authority and Fire and Rescue NSW are also contained within the site-specific Emergency Response Procedures document for each site.</p> <p>The site-specific Emergency Response Procedures document establishes responsibilities regarding who coordinates all communication with the relevant authority within the legislative timeframes.</p> <p>The site-specific 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 site-specific 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 site specific 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 for each site.</p>

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

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
98A Definition	
<p>In this Part: "plan" means a pollution incident response management plan required to be prepared under Part 5.7A of the Act.</p>	NA
98B Form of plan	
A plan is to be in written form	This plan and related information are in written form.
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	
<p>(1) General The matters required under section 153C (d) of the Act to be included in a plan are as follows:</p>	An environmental risk assessment and details of environmental management controls are located as per Table 3 below:

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements

EDL Reference

(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity"),

Table 3: Environmental Risk Assessments

Licensee	Site	Location
EDL CSM (NSW) PTY LTD	Appin	Site specific EMP
	Tower	Site specific ERP
	Mandalong	SAM Risk Module
EDL (TT) PTY LTD	Tahmoor	Site specific ERP
EDL (OCI) PTY Limited	Glennies Creek	Site specific ERP
EDL LFG (NSW) PTY LTD	Eastern Creek	SAM Risk Module
	Grange Avenue	SAM Risk Module
	Jacks Gully	SAM Risk Module
	Lucas Heights 1	SAM Risk Module
	Lucas Heights 2	SAM Risk Module
Cullerin Range Wind Farm PTY LTD	Cullerin Range	Site specific EMP

Environmental Management Plans can be accessed via the SharePoint EDL system.

The site-specific **Emergency Response Procedures** document can be accessed on site and via the SharePoint EDL system.

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	The likelihood of any relevant hazard occurring is included in the risk assessment for each site as per Table 3.
(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,	The pre-emptive action taken to minimise or prevent any risk of harm to human health or the environment is included in the risk assessment for each site as per Table 3.
(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 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 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,	<p>Each site has fire extinguishers, spill kits, PPE, first aid kits, showers and SDS (ChemAlert and in hard copy). These items are checked monthly using the HSE Monthly Inspection Checklist.</p> <p>The site-specific Emergency Response Procedures document contains a site drawing identifying safety equipment locations.</p> <p>The EDL Spill Response Procedure HSEQ-1610357324-539 addresses the spill containment options available.</p>
(g) the names, positions and 24-hour contact details of those key individuals who:	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.
(i) are responsible for activating the plan, and	
(ii) are authorised to notify relevant authorities under section 148 of the Act, and	The site-specific Emergency Response Procedures document establishes responsibilities regarding who coordinates all communication with the relevant authority within the legislative timeframes.
(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 (EPA, Ministry of Health, SafeWork NSW, the local Authority and Fire and Rescue NSW) are contained within the Emergency Response Procedures document for each site.

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
(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 site-specific 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, the required PPE, evacuation assembly areas and warning alarms. 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 site-specific Emergency Response Procedures document for each site, as well as the Site Environmental Poster.
(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 outlines emergency priorities and contains actions to be taken: <ul style="list-style-type: none"> • After an environmental incident; • If a gas leak occurs; • In the event of severe weather; • First response in case of a fire (including bushfires); 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 . The objective of this training is to educate EDL employees and contractors on the spill prevention, spill management, and spill reporting requirements on all EDL sites.

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
	<p>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. Annual testing of the PIRMP also provides training for involved EDL operators.</p>
(n) the dates on which the plan has been tested and the name of the person who carried out the test,	<p>The dates and name of the person who carried out the test is managed via the EDL Compliance Task Register located in the SharePoint system and documented in the Emergency Response Exercise Record Form HSEQ-1610357324-193 for each testing scenario.</p>
(o) the dates on which the plan is updated,	<p>The date this plan was published is located on the cover page of this document. The document version history is in Table 2 of this document.</p>
(p) the manner in which the plan is to be tested and maintained.	<p>The testing of this document is mentioned in the Testing Frequency section of this document. The revision history of this document is listed in Table 2.</p>
98D Availability of plan	
<p>(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.</p>	<p>A printed copy of the site-specific 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 (within 14 days of publishing). The EDL Spill Response Procedure HSEQ-1610357324-539 and site-specific Environmental Management Plans are also available via the SharePoint EDL system.</p>
<p>(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.</p>	

Protection of the Environment Operations (General) Regulation 2009 Part 3A Requirements	EDL Reference
<p>(3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:</p> <p>(a) section 153C (a) of the Act, and</p> <p>(b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).</p>	
<p>(4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 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).</p>	<p>Personal information is not included in this plan. Names, positions, and contacts details of responsible persons are in the site-specific Emergency Response Procedures documents.</p>
<p>98E Testing of plan</p>	
<p>(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.</p>	<p>The testing frequency of this plan is managed via the EDL Compliance Task Register and it is specified in the Testing Frequency section of this plan.</p> <p>Testing of the plan is undertaken utilising the Emergency Response Exercise Record Form HSEQ-1610357324-193.</p>
<p>(2) Any such test is to be carried out:</p> <p>(a) routinely at least once every 12 months, and</p> <p>(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.</p>	<p>The testing frequency of this plan is managed via the EDL Compliance Task Register and it is specified in the Testing Frequency section of this plan.</p>