A world of new energy

NSW Pollution Incident Response Management Plan (PIRMP)

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IMPORTANT

In case of emergency, refer directly to the printed Site Emergency Response Procedures for initial response.

This document is necessary for regulatory compliance but does not contain the procedures.

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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, the Protection of the Environment Operations (General) Regulation 2022 and 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 (2022). 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	• Appin CSM Power Station – Environmental Protection Licence (EPL) 5482 • Tower Power Station – EPL 5357 • Mandalong Power Station – EPL 21230
EDL (TT) PTY LTD	• Tahmoor Power Generation Plant – EPL 11768
Cullerin Range Wind Farm PTY LTD	• 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	12.0
Current document number	HSEQ-125008896-8
Previous document	Emergency Response Procedures – Energy Developments NSW Power Stations
Description of changes	Revision 12: Removed closed power stations Revision 11: Added front page note Revision 10: Updated Regulation, risk register locations Revision 9: Formatting changes, removed Belrose Revision 8: Update following review Revision 7: Updating document metadata

Item	Details
	Revision 6: Review of plan against updated PIRMP guideline. Revision 5: Update following review Revision 4: Update following review Revision 3: Update following review. Document number change. Revision 2: Update following review Revision 1: PIRMP new format

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
153C Information to be included in plan	
A pollution incident response management plan must be in the form required by the regulations and must include the following: (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: (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 (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 (iii) any persons or authorities required to be notified by Part 5.7,	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. The contact details of each relevant authority are in the **Regulator Contact Sheet** which is located and accessed via the SharePoint EDL system. 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. The site-specific **Emergency Response Procedures** document establishes responsibilities regarding who coordinates all communication with the relevant authority within the legislative timeframes. The site-specific **Emergency Response Procedures** document, establishes responsibilities about who handles or organises communication with adjacent businesses.
(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,	The EDL **Spill Response Procedure HSEQ-1610357324-539** addresses actions to be taken immediately after a spill event. The Environmental Incident Response procedure within the site-specific **Emergency Response Procedures** document addresses actions to be taken immediately after an environmental incident.
(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,	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.

Protection of the Environment Operations Act 1997 – Sect 153 C Requirements	EDL Reference
	The Environmental Incident Response procedure is also located in the **Emergency Response Procedures** document for each site. 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. The contact details of each relevant authority are 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 and local community within the legislative timeframes.
(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 2022 Chapter 4 Requirements	EDL Reference
70 Definition	
In this Chapter: "PIRM **plan**" means a pollution incident response management plan required to be prepared under the Act, Part 5.7A	NA
71 Form of plan	
A PIRM plan - (a) must be in written form; and	This plan and related information are in written form.
(b) may form part of another document required to be prepared under or in accordance with another law if the information required to be included in the PIRM plan is readily identifiable as that information in that other document.	The content of this plan is addressed in several documents and systems from EDL. References are mentioned in this table.

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Protection of the Environment Operations (General) Regulation 2022 Chapter 4 Requirements	EDL Reference
72 Additional matters to be included in PIRM plan	
The following matters must be included in a PIRM plan – (a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the "relevant activity"),	An environmental risk assessment and details of environmental management controls are located in the SAM Risk Module. **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.
(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 **Error! Reference source not found.**.
(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 **Error! Reference source not found.**.
(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,	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**. The site-specific **Emergency Response Procedures** document contains a site drawing identifying safety equipment locations. The EDL **Spill Response Procedure HSEQ-1610357324-539** addresses the spill containment options available.
(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**

Protection of the Environment Operations (General) Regulation 2022 Chapter 4 Requirements	EDL Reference
(i) are responsible for activating the PIRM plan, and	**Response Procedures** document which is accessible via the SharePoint system and is also available in hard copy at each site. The site-specific **Emergency Response Procedures** document establishes responsibilities regarding who coordinates all communication with the relevant authority within the legislative timeframes.
(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 (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.
(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,	Environmental Management Plans contain measures to reduce the risk of harm. **Environmental Management Plans** can be accessed via the SharePoint EDL system. 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.

Protection of the Environment Operations (General) Regulation 2022 Chapter 4 Requirements	EDL Reference
	The **Emergency Response Procedures** document for each site outlines emergency priorities and contains actions to be taken: • 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 PIRM 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. 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.
(n) the dates on which the PIRM 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 system and documented in the **Emergency Response Exercise Record Form HSEQ-1610357324-193** for each testing scenario.
(o) the dates on which the PIRM plan is updated,	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) the manner in which the PIRM plan is to be tested and maintained.	Environmental emergency exercises are conducted in accordance with the instructions on the **Emergency Response Exercise Record Form HSEQ-1610357324-193.** 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.

Protection of the Environment Operations (General) Regulation 2022 Chapter 4 Requirements	EDL Reference
74 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 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.
(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.	
(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) this Regulation, section 72(h) and (i) or 73(b)(ii) and (iii).	
(4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a PIRM plan that is made available to any person other than an authorised officer.	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.
75 Testing of PIRM plan	
(1) A PIRM plan must be tested – (a) routinely at least once every 12 months; and (b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or	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. Testing of the plan is undertaken utilising the **Emergency Response Exercise Record Form HSEQ-1610357324-193**.

Protection of the Environment Operations (General) Regulation 2022 Chapter 4 Requirements	EDL Reference
threatened material harm to the environment, within the meaning of the Act, section 147 – within 1 month of the incident occurring.	
(2) The test must be carried out in a way to ensure the following – (a) the information included in the PIRM plan is accurate and up to date, (b) the PIRM plan is capable of being implemented in a workable and effective way. (3) A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident.	Testing of the plan is undertaken utilising the **Emergency Response Exercise Record Form HSEQ-1610357324-193**, which ensures the plan is accurate and workable.