

# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

**For: *Brine Dam, Broken Hill – Licence  
Number 21400***

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## **Pollution Incident Response Management Plan for Brine Dam, Broken Hill**

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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*.

The site is:

- Located in the industrial estate of Broken Hill.
- Owned by Perilya Pty Ltd and currently leased to Essential Water
- A Brine Dam previously utilised by Essential Water for contaminated water from water treatment plant.
- To be decommissioned and returned to Perilya by 25/08/2020.

GTE1 Pty Ltd are the principle contractor engaged to sweep up salts in dam and transport them to Cleanaway Waste Management Facility at Inkerman SA, which is the closest site available for this type of waste material. The dam is lined with HDPE liner and geofabric containing salts of spadeable consistency. GTE1 Pty Ltd will sweep salts using appropriate methodology as contained within the Project Management Plan to ensure no contamination of surrounding areas. Dust suppression to be utilized and salts will not be stockpiled on site for extended periods. The Salts are removed on a regular basis by Garden Grove Haulage Pty Ltd in sealed trucks.

EPA Licence 21400 is a Transport licence for Category 1 and 2 trackable waste for any capacity.

Transport vehicles are garaged at the following sites:

1. Garden Grove Haulage Pty Ltd, Golden Grove, Adelaide.

Under the legislation referred to above, the 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.

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

1. **Background** –describes main features of the regulation
2. **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. Ranking of risks is included in appendices
3. **Maps** – map of project to show location of potentially affected neighbours and environmentally sensitive areas
4. **Emergency incident response procedures** – what to do in case of material harm
5. **Early warnings and communication to neighbours** –when to contact neighbours in case of pollution incidents and info required for website
6. **Training** –information to be passed on to staff and contractors
7. **Updating of plan** –frequency of updates
8. **Testing** – frequency of drills to test effectiveness of PIRMP



**9. Implementing of plan** – reference to legislation requirement to carry out aspects of the plan during a pollution incident

**Introduction**

The Brine Dam Broken Hill site is licensed to GTE1 Pty Ltd EPA transport licence number 21400 for the scheduled activities Transport of intermediate level contaminated salts from Broken Hill NSW to Inkerman SA.

The site has an overarching environmental management system supported by GTE1 Pty Ltd Environmental Management System. This document is accredited under ISO 14001:2015.

**Purpose**

The purpose of 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.

**Scope**

This PIRMP is for the use of all Brine Dam Broken Hill staff involved in the removal and transport of intermediate level contaminated waste salts and GTE1 Pty Ltd contractors undertaking works on the site. The PIRMP will be implemented only if material harm to human health or the environment occurs or threatens to occur

The Brine Dam site is located at Broken Hill and holds EPL number 21400. Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of GTE1 Pty Ltd staff to report and respond to pollution incidents in accordance with the 2012 changes to the POEO Act 1997 and the POEO (General) Regulation 2009

**Scale**

This PIRMP is based on the definition of Material Harm to the environment under POEO Act 1997:



### **147 Meaning of material harm to the environment**

(1) For the purposes of this Part:

(a) 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), and

(b) 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.

This PIRMP may also be used to respond to sub-material harm incidents, which are considered trivial or below \$10,000 as per the above definition. Note that incidents which do not trigger level 3 or 4 incidents are not considered to fully implement this PIRMP. These levels include:

- Level 1 → Trivial incident in which the incident is easily managed by internal means and there is no off-site emission and the scale of the incident is small and easily contained, but internally reported and managed as per GTE1 Pty Ltd Project Management Plan
- Level 2 → A trivial incident (sub-material harm) which is more about complaints than environmental harm, such as small-scale dust or odour emissions or minor exceedances in licence limits. While not considered material harm under this PIRMP, they require at least a courtesy call to the EPA to inform of a minor Licence issue or non-conformance. Procedure as documented in GTE1 Pty Ltd Environmental Management System is to be followed.
- Level 3 → A lower level Material Harm incident where a Fire Unit is not required (e.g. 000 is not required to be called. Procedure as documented in GTE1 Pty Ltd Environmental Management System is to be followed. Procedure as documented in GTE1 Pty Ltd Environmental Management System is to be followed.  
As an example this level is triggered where the clean-up cost of a road spill of waste or other materials exceeds \$10,000.
- Level 4 → A high level Material Harm incident where a Fire Unit is required or the spill, escape is of a large significance requiring external emergency response. Procedure as documented in GTE1 Pty Ltd Environmental Management System is to be followed. The emergency response procedure as documented in GTE1 Pty Ltd Work Health & Safety Management System is to also be followed. Procedure as documented in GTE1 Pty Ltd Environmental Management System is to be followed.  
As an example this level is triggered where the clean-up cost of a road spill of waste or other materials exceeds \$10,000 and additional assistance from Fire and Rescue are required such as to clear the road and or deal with a vehicle fire or where neighbours to the incident are required to be informed.

### **Responsibilities**

Refer to table 6 for Staff Names and Contact details.

All GTE1 Pty Ltd staff and contractors:

- General staff → to raise the alarm to supervisors of an incident
- Site Supervisors → to raise the alarm to management of an incident 
- Implementing PRIMP as required

Site Supervisor responsibilities include



- Ensuring their staff are aware of PIRMP
- Training of staff to ensure compliance with PIRMP

General Manager & Office Administration are responsible for:

- Assisting with advice, reporting and response process;
- Ensuring the Plan is made available to staff responsible for implementing the plan and authorised officers under the POEO Act
- Communicating PIRMP with subcontractors and/or visitors to site.
- Giving advice on whether environmental incidents need to be reported to external agencies
- Providing in the notification of pollution incidents to the relevant authorities
- Provision of maps associated with the plan
- Assistance with the implementation of response actions to pollution incidents
- Assistance in communicating with neighbours, key stakeholders and the local community about the Plan and when incidents of a certain nature occur
- Ensuring that training responsible for activating about their roles in the Plan
- Testing
- Reviewing and updating this plan.

### **Documentation**

The environmental incident register GTE1 Pty Ltd Environmental Management System, Environmental Incident Register is used to record and monitor all environmental incidents within GTE1 Pty Ltd. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept by the Office Administrator.

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

### **Additional Information**

**Contact:** Sonje Finlayson 0409844341

**Effective date:** 06/04/2020

**Review date:** See Updating of Plan



## 2 EVALUATION

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 Licences (EPLs). The Brine Dam Broken Hill operates under EPL no. 21400 and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

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

**TABLE 1**

<b>PIRMP Legislation covered under this Plan</b>		Reference
<b>POEO Act Part 5.7</b>		
153A	Duty of licence holder to prepare pollution incident response management plan	Whole document plus references
153C	Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities	5 + references
153D	Keeping of plan:	6.3
153E	Testing of plan:	9
153F	Implementation of plan:	10
<b>POEO (General) Regulation 2009</b>		
98C(a)	Hazard assessment:	3.4 + appendix 1
98C(b)	Likelihood assessment:	3.4 + appendix 1
98C(c)	Pre-Emptive Action:	3.4 + appendix 1
98C(d)	Pollutant Inventory Types:	3.4 + appendix 1
98C(e)	Pollutant Inventory Quantities:	3.4 + appendix 1
98C(f)	Safety Equipment:	3.4 + appendix 1
98C(g)	Staff Contacts:	5.1.1
98C(h)	Authority Contact:	5.1.4 + 6.2 + references
98C(i)	Early Warnings Neighbours:	3.4 & 6



98C(j)	Staff Safety:	3.4
98C(k)	Maps location of pollutants:	3.4 and 4
98C(l)	Early Warnings General:	3.4 and 6
98C(m)	Training of Staff:	7
98C(n)	Timing of Testing:	9
98C(o)	Updating of Plan:	8
98C(p)	Plan Testing:	9
98D(1)	Availability of plan:	6.3
98D(2)	Publishing Plan Parts:	6.2 + 6.3
98D(3)	Procedures under Act:	5 + references
98D(4)	Privacy Protection:	6.3
98E(1)	Testing of the Plan:	9
98E(2)	Minimum Testing requirements:	9



### **3 HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS**

#### **3.1 Overview**

This chapter deals with the [POEO \(General\) Regulation 2009's sections 98\(a\) to 98\(f\)](#) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.

The Brine Dam site undertakes prior to this document, the receipt of waste water from Essential Water, Water Treatment Plant. The site has been decommissioned and this project relates to the removal of all salts and associated liner from the dam and transport and disposal of at an appropriate facility.

This Plan also considers both air and water based pollution incident impacts. Overall considerable design and written environmental management systems are in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

This Plan uses a modular approach to this risk assessment process. Each module represents an operation undertaken in Decommissioning of Brine Dam site such as use and storage of hazardous chemicals and use and storage of non-hazardous chemicals and the transport of waste products to an approved facility. These modules are common across GTE1 Pty Ltd operations, but include site specific issues for each Plan. They are based on GTE1 Pty Ltd Environmental Management System

The risk assessment and control measures process include impact on neighbours and crosses over with safety risk assessment processes and is covered under GTE1 Pty Ltd Environmental Management System.

Each module also includes an inventory of pollutants or expected maximum quantities of pollutants likely to be stored. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids.

#### **3.2 Summary of Pollution Types**

Decommissioning of the brine dam by its nature has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types found for the Broken Hill Brine Dam.



**Table 2: List of Typical Main Pollutants in decommissioning of Brine Dam**

Description	Comments
<b>Air Based Emissions</b>	
Dust	From <ul style="list-style-type: none"> <li>- Road construction to site</li> <li>- Vehicles traversing roads</li> <li>- Wind</li> <li>- Creation of entry and exit points to Dam</li> <li>- Sweeping of salts.</li> <li>- Loading of salts for transport</li> </ul> Dust is covered under this Plan.
Fire	Fire is not considered an environmental incident, but the smoke and fire water runoff from the fire can and can affect neighbours. Fire Management is covered under the GTE1 Pty Ltd Environmental Management System, Emergency Response Plan
Substance	Gaseous emissions from the site, which are not part of the licence conditions and which represent an air impurity may, if of a scale of release, a pollution incident.
Noise	Emitted by plant and equipment. Covered under GTE1 Pty Ltd Environmental Management System, Environmental Factors - noise. Noise is not considered a pollution incident and not covered further under this Plan.
Odour	Odour is generally not associated with this site.
<b>Spill type emissions</b>	
Class 3 flammable liquids e.g. Fuels including petrol based fuels and	For plant and equipment operations. Covered under: <ul style="list-style-type: none"> <li>• Hazardous Substances Register</li> <li>• Safety Data Sheets</li> </ul>
Combustible Liquids (C1 & C2) Lubricants and hydraulic oils and other	For plant and equipment operations. Covered under <ul style="list-style-type: none"> <li>• Hazardous Substances Register</li> <li>• Safety Data Sheets</li> </ul>
Aqueous wastes, wastewaters and aqueous potential pollutants	Management of water and stormwater. Covered under: <ul style="list-style-type: none"> <li>• GTE1 Pty Ltd Environmental Management System</li> <li>• Broken Hill Brine Dam Project Management Plan</li> </ul>
Wastes	Storage of wastes and wastes containing chemicals: Covered under: <ul style="list-style-type: none"> <li>• GTE1 Pty Ltd Environmental Management System</li> <li>• Broken Hill Brine Dam Project Management Plan</li> </ul>



### 3.2.1 Use and Storage of Chemicals Safety Issues

Storage and handling of substances which may cause pollution are divided into two areas:

- Hazardous Chemicals — covered by occupational health and safety requirements
- Non-hazardous and aqueous based substances

Hazardous chemicals are documented and itemized in accordance to the Workplace Health and Safety Regulation 2011. The specific hazardous and non-hazardous chemicals documents are identified in Table 3:

**Table 3 Reference Documents to Inventory of Pollutants**

Document Name	Relation to this Plan
GTE1 Pty Ltd, Work Health and Safety Management System	Provides: <ul style="list-style-type: none"> <li>• Key contacts regarding OH&amp;S issues and incidents</li> <li>• Hazardous chemicals register</li> <li>• Storage and handling requirements</li> <li>• Plant maintenance records</li> <li>• Emergency procedures</li> <li>• Training and record keeping</li> <li>• Handling of hazardous materials and dangerous goods</li> <li>• Document retention</li> <li>• Safety Data Sheets</li> </ul>

### 3.3 Risk assessment and Control Measures (pre-emptive actions)

#### 3.3.1 Identification of Risk Areas

Assessment analysis and control measures to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity are required under the overarching documents:

- GTE1 Pty Ltd, Environmental Management System v1.3
- GTE1 Pty Ltd, Work, Health & Safety Management System v1.2



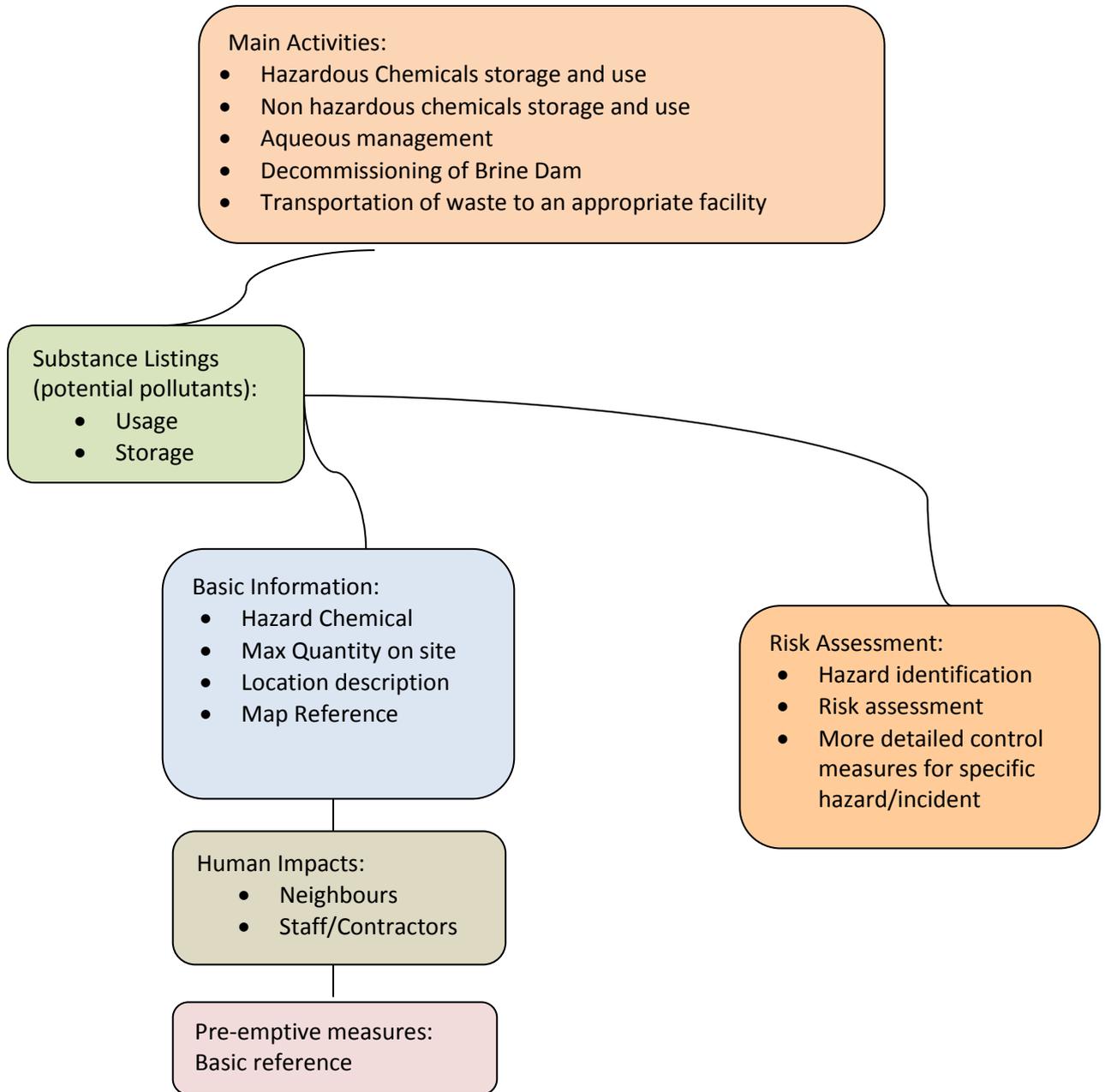
**Table 4 List of Documents Covering Environmental Risk Assessment and Control Measures**

Document Name	Relation to this Plan
GTE1 Pty Ltd Work, Health & Safety Management System v1.2	Provides: <ul style="list-style-type: none"><li>• Key contacts regarding WHS issues and incidents</li><li>• Hazardous chemicals register</li><li>• Storage and handling requirements</li><li>• Plant maintenance records</li><li>• Emergency procedures</li><li>• Training and record keeping</li><li>• Handling of hazardous materials and dangerous goods</li></ul>
GTE1 Pty Ltd Environmental Management System v1.3	Provides in relation to PIRMP requirements: <ul style="list-style-type: none"><li>• Internal auditing of sites and</li></ul> Requires GTE1 Pty Ltd sites to undertake or implement: <ul style="list-style-type: none"><li>• Aspects and Impacts assessment</li><li>• Construction activities</li><li>• Maintenance activities</li><li>• Facility management</li><li>• Emergency response and incident response</li><li>• Staff training and competencies</li></ul>
Emergency Plan	<ul style="list-style-type: none"><li>• Main emergencies</li><li>• Emergency contact</li><li>• Emergency procedures</li><li>• Incident management</li><li>• Safety and first aid requirements</li></ul>



### 3.4 Risk Modules

To improve the effectiveness of the Plan the following requirements under the POEO (General) Regulation are covered in this section. This is undertaken by a process described in the following flowchart:





In Appendix 1 Risk Assessment, each of the activities has their polluting substances listed. Each polluting substance is assessed for the requirements described in the flowchart above.

Table 5 provides a breakdown of the coverage of the regulatory requirements in the modules according to the POEO (General) Regulation 2009 by section part.

**Table 5: Risk Module Coverage of the POEO (General) Regulation 2009**

Section	Item heading	Covered by
98C(a)	Hazard assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
98C(b)	Likelihood assessment:	Hazard and Likelihood Risk assessment and Corrective Control Measures tables
98C(c)	Pre-Emptive Action:	Hazard and Likelihood Risk assessment and Corrective Control Measures – Control measures and corrective action
98C(d)	Pollutant Inventory Types:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Name/description, Covered under Hazardous Chemicals?
98C(e)	Pollutant Inventory Quantities:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Amount Stored (maximum or estimated Maximums stored)
98C(f)	Safety Equipment:	List Of Polluting Substance Storages/Uses At Site Initial Assessment- Ref to Safety Coverage
98C(i)	Early Warnings Neighbours:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Need for early warnings to neighbours
98C(j)	Staff Safety:	List Of Polluting Substance Storages/Uses At Site Initial Assessment – Ref to Safety Coverage
98C(k)	Maps location of pollutants:	List Of Polluting Substance Storages/Uses At Site Initial Assessment Location of Storage, Map reference (supports section 4 Maps)



## 4 MAPS

This section covers the *POEO (General) Regulation s98E(k)* requirements which are:

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.

Map 4.1 shows the geographic location of the Brine Dam and includes the requirements above.

Map 4.2 shows the location of potentially affected neighbours

Map 4.3 shows heavy vehicle route being taken.



#### 4.1 EPL site map for Brine Dam

Brine dam is area in blue and is now dry.



#### 4.2 EPL map of vicinity

No nearby neighbours or water ways. Environmental assessment has been completed by NSW Public works and reveals no native flora or fauna habitats to be impacted.



Showing dam location to closest main water course



### 4.3 Heavy Vehicle Transport Route

NHVR Portal

Route planner tool
PLAN ROADS DISTANCE LAYERS SUMMARY

Route notes

0 / 49999

**Route summary**

Start: 119 Pinnacles Road, Broken Hill NSW 2880

- Pinnacles Rd, Broken Hill
- Pinnacles Pl, Broken Hill
- Unknown, Broken Hill
- Barrier Hwy, [Broken Hill - Terowie]
- Unknown, Terowie
- ...
- Main Rd, Whyte Yarcowie
- Whyte Rd, Whyte
- Jamestown-Whyte Yarcowie Rd, Belalie
- Wilkins Hwy**
- R M Williams Way, Belalie
- Caitowie-Jamestown Rd, Belalie
- Wilkins Hwy, [Jamestown - Gladstone]
- Horrocks Hwy,
- Wilkins Hwy,
- Augusta Hwy, [Napperby - Snowtown]
- Princes Hwy, Cameron
- Augusta Hwy, Barunga Gap
- Princes Hwy, Barunga Gap
- Augusta Hwy, Goyder
- Wakefield Hwy, [Goyder - Inkerman]
- Primes Rd, Inkerman
- End: Prime Road, Inkerman SA

## 5 EMERGENCY INCIDENT RESPONSE PROCEDURES

### 5.1.1 Internal communications — key names and contacts

Internal Communications are outlined in the following documents:

- GTE1 Pty Ltd Work, Health and Safety Management Plan

**Table 6: List of Key Jobs and 24 hour Contact Details**

Job title	Contact Number
Director – Andrew Finlayson	0438 688 443
Project Manager – Sonje Finlayson	0409 844 341
Site Supervisor - Aaron Cock	0467 581 388
Site Supervisor – Greg Greene	0419 569 592

### 5.1.2 Action to be Taken Immediately after a Pollution Incident by License Holder and Occupier of the Premises

This Pollution Incident Response Management Plan must be followed immediately after a Material Harm pollution incident occurs.

Action also follows GTE1 Pty Ltd Environmental Management System.

### 5.1.3 Spills from Trucks Actions

In the event of a pollution incident that will cause harm to the environment, the following actions are in place:

1. The Driver/Operator shall determine the scale and risk level of the pollution incident, by reviewing the following parameters: -
  - The location of the hazard and its proximity to sensitive receivers
  - The volume of the hazard (if applicable) at that location
  - The type of hazard, and
  - Its potential consequence on the receiving environment.
2. If the incident presents a Level 4 incident; an immediate threat to human health or the environment, the driver shall call “000” Police or Fire and Rescue immediately.

The information that must be provided includes;

- the time, date, nature, duration and location of the incident,
- the location of the place where pollution is occurring or is likely to occur,
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- the circumstances in which the incident occurred (including the cause of the incident, if known),
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
- other information prescribed by the regulations

3. If the incident is a Level 2 or 3, where it does not present immediate threat to human health or the environment, the Driver/ Operator should call the Operations Manager.
4. If the Operations Manager cannot be contacted the driver should call the Director.

The Driver/ Operator should then: -

- Confirm material involved
- Wear suitable protective clothing
- Block any 'at risk' drains and divert any flowing liquid or flowable solids spills away from any sensitive areas
- Prevent entry of solid and liquid material into drain or waterway using the spill control kits provided
- If necessary, place barriers across the storm water drains
- Avoid contact or inhalation of released material
- Don't walk through spills
- Clean up liquid spill using absorbent pads and / or material in the spill kits provided

#### **5.1.4 Procedures to be followed by the Responsible Person notifying the Pollution**

This is covered under:

- GTE1 Pty Ltd Environmental Management System
- Incident to be notified to Site Supervisor
- If an emergency, 000 to be called
- Site to be secured
- Environmental incident response procedure to be followed
- The Director or Project Manager will notify relevant authorities immediately they become aware of a Level 3 or 4 incident.
- Incident to be documented appropriately

#### **5.1.5 Procedures to be followed for coordinating with the Authorities or Persons**

This is covered under See section 5.4

#### **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.

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.

## **5.2 Procedure to be followed Following an Air Incident**

### **Pollution incidents – Air Emissions**

An air emission can include, smoke, dust, odour or emission of a chemical or air impurity.

This action should only be followed if there is no procedure or other requirement to follow in dealing with an air emission type incident. For example dust from vehicles transporting waste.

It or its alternative should be implemented in conjunction with GTE1 Pty Ltd Environmental Management System, Environmental Factors, Air Quality.

<b>Incidents from Air Based Emissions - generic procedure</b>		
<b>– use when site specific procedure does not exist</b>		
<b>Emission</b>	<b>Action</b>	<b>Comments / Information</b>
<b>Dust</b>	Water cart for dust suppression to be used on site as required. If dust is of such a scale it will impact on neighbours health or represents a risk to neighbours, consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice.	Generally observable or complaints based supported by health impacts such as time off work or medical certificate or complaints exceed more than 6 neighbours.
<b>Fire</b>	Depends on size and type of fire. Follow emergency plan for fires. If smoke causes a minor health risk to neighbours consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice. Co-ordinate with combat agencies to inform neighbours if a larger scale health risk.	Smoke is the main air emission of concern. Complaints based supported by health impacts such as time off work or medical certificate or complaints exceed more than 6 neighbours. Large fires threatening homes and property may trigger evacuation procedures with neighbours
<b>Substance</b>	Depends on the type of substance, its health impacts, toxicology and its scale of emission. For small scale emissions consider informing potentially affected neighbours to close their doors and windows and stay indoors until further notice. Co-ordinate with combat agencies to inform neighbours if a larger scale health risk.	Known release of an air emission likely to cause a health risk of neighbours. Complaints based supported by health impacts such as time off work or medical certificate or complaints exceed more than 6 neighbours.
<b>Odour</b>	Not considered a likely risk	
<b>Noise</b>	GTE1 Pty Ltd Environmental Management System, Environmental Factors covers noise management Neighbours who identify themselves when lodging a complaint will be followed up by the responsible site manager or nominee	Note: noise is not a pollution Incident under the POEO Act.

### 5.3 External communications – government agencies and other parties

This is covered under:

- Pollution Incident Response Management Plan
- Broken Hill Brine Dam Decommissioning Project Management Plan
- GTE1 Pty Ltd Environmental Management System
- GTE1 Pty Ltd Work, Health & Safety Management System
- Site plan

- EPA Licence.

### **5.3.1 Co-coordinating, with the authorities**

POEO Act s153C States in relation to the contents of a PIRMP:

*(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.*

This action should only be followed if there is no procedure or other requirement to follow in dealing with a spill type incident.

Also follow the GTE1 Pty Ltd, Environmental Management System, Emergency Response.

### **5.3.2 Site Control – Incident Response**

Emergency contact details are listed in the GTE1 Pty Ltd Environmental Management System and The Broken Hill Brine Dam Project Management Plan

To cover the requirements of this plan a generic procedure for site control and communications internally and with the appropriate government agencies, neighbours and other stakeholders appears below.

#### **Evacuation**

For large dangerous incidents such as large bush fires or major flooding, the Site Controller may consider evacuation of staff to appropriate distances away from the incident. If an Emergency Plan has been developed, this plan will provide appropriate distances and or locations of evacuation areas.

### **5.4 Procedures for Notifying Pollution Incident to EPA, Local Councils or Relevant Authorities**

This is covered under GTE1 Pty Ltd Environmental Management System, Emergency Response.

## 6 EARLY WARNINGS AND COMMUNICATIONS TO NEIGHBOURS

### 6.1 Community Communication and Consultation

GTE1 Pty Ltd has and would continue to undertake community and stakeholder consultation where necessary.

GTE1 Pty Ltd will continue to update the community where required as outlined in the Broken Hill Brine Dam Decommissioning Project Management Plan.

An assessment of the typical pollution incident types has been undertaken, in Chapter 4 and in other GTE1 Pty Ltd reports to consider the potential impacts on neighbours. This resulted in the early warning actions located in Table 7 below.

For a Level 4 incident where community notification is required following an incident involving trackable waste, as determined by the incident controller from emergency services (NSW Police Force or Fire & Rescue NSW/ Rural Fire Service).

GTE1 Director or Project Manager will coordinate communication with emergency services personnel responsible for the managing the incident.

**Table 7: List of Typical Main Pollutants and Potential Neighbour Impacts and Early Warnings**

<b>Air Based Emissions</b>		
<b>Description</b>	<b>Potential Risks</b>	<b>Early Warning actions</b>
Dust	Air quality issues Loss of amenity Community complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
Fire – smoke Gaseous substance leak	Air quality issues	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice. For larger fires, coordinate with combat agencies.
Noise	Loss of amenity	Not required under PIRMP. Communicate with neighbours on as needs basis.
Odour	Air quality issues Loss of amenity Community Complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
<b>Spill type emissions</b>		
Fuel including diesel and petrol based fuels	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice.

		For larger spills coordinate with combat agency.
Lubricants and hydraulic oils	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Pesticides/herbicides	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice. For larger spills coordinate with combat agency.
Other chemicals	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Soils and erosion	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Contaminated materials uncovered	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Wastes	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice

## 6.2 Website information

This Pollution Incident Response Management Plan (PIRMP or Plan) Website Information 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 s98D*:

*(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) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).*

## Emergency Incident Response Procedures

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.

For the above pollution incidents, the GTE1 Pty Ltd, Andrew Finlayson and Soni Finlayson will be responsible for reporting to the authorities below immediately after it becomes aware of a level 3 or level 4 incident.

### **Relevant authorities' notification order**

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

<b>call Fire and Rescue first</b>	000
EPA	131 555
Broken Hill Greater Western Area Health Unit	08 8080 1499
SafeworkNSW	131 050
Broken Hill City Council	08 8080 3300

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

<b>call EPA first</b>	131 555
Broken Hill City Council	08 8080 3300
Broken Hill Greater Western Area Health Unit	08 8080 1499
SafeWorkNSW	131 050
Fire and Rescue	1300 729 579

**GTE1 Pty Ltd Environmental Complaints/Incident Reporting number 0409 844 341**

Early warnings for affected or potentially affected community members for any pollution incident are to be communicated to those members via a door knock process. The General Manager or nominee will be responsible for coordinating the door knock.

For air pollution incidents that may affect neighbours, those neighbours will be asked to close their doors and windows and stay indoors until further notice.

For water pollution incidents that may affect neighbours who could access the said water, those neighbours will be asked to avoid use of the water until further notice.

Regular updates of any Level 4 pollution incidents will be provided to the local community, using notices in local papers or via door knocks as required.

### **6.3 Availability and Location of This Plan**

The *POEO (General) Regulation 2009 s98D(1)* states:

(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.

The availability of this Plan will be made available by locating printed copies in the same locations as the Environment Protection Licence (EPL) is located – namely in the GTE1 Pty Ltd site office at 119 Pinnacles Road, Broken Hill NSW 2880.

Unlike the EPL this Plan is to only be available to those who are to implement the Plan. This is made clear by The *POEO (General) Regulation 2009 s98D(3)* which States:

*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).*

If components of the Plan are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative Plans with such sensitive information removed (e.g. contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

## **7 TRAINING – SUMMARY AND REFERENCE TO PROJECT PROCEDURE**

Necessary environmental management competencies have been determined for each of the broad positions in Broken Hill Brine Dam including:

- Director
- Project Manager
- Site Supervisor

Training of GTE1 Pty Ltd staff falls into several categories:

- Project / Site Training Information held at start up meeting
- Site inductions for all personnel
- Daily tool box meetings

Startup meeting will include ensuring all staff have an awareness of:

- Awareness of the PIRMP
- Where this Plan can be accessed
- Pollution incident classification and reporting under this plan
- Spill response actions under this plan
- Other incident response actions under this plan
- Early warnings internally and to neighbours where appropriate
- Specific procedures in dealing with potential pollution incidents

## 8 UPDATING OF PLAN

**Effective date:** 06/04/2020

**Review date**                    This Plan will be updated according to the following:

- 12 months from the last update; or
- Within one month of a Category 1 Incident; or
- As identified after testing of the Plan (see section 8).

## 9 TESTING

The POEO (General) Regulation 2009 98E states for testing of the 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.*

*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*

Testing of the Plan will be integrated into other emergency and incident testing and training programs where possible.

Initial testing of the plan will be undertaken within 6 months of the acceptance of the PIRMP. Design of the testing will be undertaken 1 month before the testing is conducted.

Records of the testing will be kept by the Project Manager and forwarded to the Office Administrator for filing.

**Testing dates**                      This Plan will be tested according to the following:

- 12 months from the last test, or
- Design of the testing method will be about 1 month before the initial test date
- Or before one month after a reportable material harm incident where this PIRMP is implemented for a level 3 or level 4 incident.

### **Recording of Testing**

A detailed record of the testing of the Plan will be prepared after each testing of the plan is undertaken. If the test identifies any shortcomings in the Plan, especially the implementation of the spill response procedures, the Plan will be corrected or appropriate non-conformance actions will be undertaken.

## **10 IMPLEMENTATION OF THE PLAN**

The POEO Act 1997 s 153F requires the Plan be implemented if a pollution incident occurs. \$2 million maximum fines apply for failing to implement the Plan.

Hence if a pollution incident occurs:

- It must be responded to according to this Plan and its reference documents.
- An incident response report/audit must be completed as per s101 POEO (General) Regulation 2009.

## APPENDIX 1 RISK MODULES

This Plan uses a risk assessment process to demonstrate the existing risk control methods are effective in preventing and minimising environmental harm from pollution incidents. If unacceptable risks are identified new control measures will be introduced. The modular format permits the use of common activities associated with decommissioning of brine dam to be used in future PIRMP documents. The modules used for this Plan for the Broken Hill Brine Dam site include:

- Dust
- Hazardous substances (Phenol, Arsenic, lead)
- Transportation of materials to SA.

Each module uses a standard risk matrix used by GTE1 Pty Ltd Broken Hill Brine Pond Decommissioning Project Management Plan.

Each module lists the type of use or storage for the pollutant/s being considered.

Each of the above is considered for a range of hazards and their control method considered. Also considered in the above process is:

- Impact on neighbours
- Safety
- Location
- If the pollutant is a hazardous chemical

### Risk Matrix

Environmental risks associated with Brine Dam and its contractor's activities use the following table A.

**Table A: GTE1 Pty Ltd risk matrix**

Consequence or Impact of Hazard	Risk Level	A	P	U	Likelihood/Probability	Risk Rating
<b>H</b> - Significant detrimental environmental impact, potential death, permanent or long term disability or illness,	<b>H</b> = High	1	1	2	<b>A</b> = Almost certain could happen at any time	<b>1</b> = Immediate action is required
<b>M</b> - Short term environmental impact, potential temporary disability or illness requiring medical attention	<b>M</b> = Medium	1	2	3	<b>P</b> = Possible risk could happen occasionally	<b>2</b> =Control the risks/ hazards a.s.a.p.
<b>L</b> - Minimal environmental impact, potential minor injury requiring first aid	<b>L</b> = Low	2	3	3	<b>U</b> = Unlikely may happen rarely	<b>3</b> =Control risks with routine procedures

## Risk Control

**Eliminate** – ‘Design out’ the hazard when new materials, equipment and work systems are being purchased for the site;

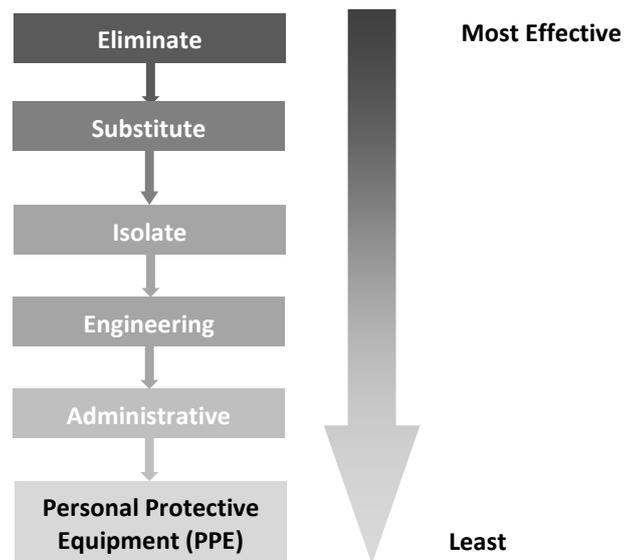
**Substitute** - Substitute less hazardous materials, equipment or substances;

**Isolate** – separate the environment/workers from hazards using barriers, enclosing noisy equipment;

**Engineering** – use engineering controls to reduce the risks. Make sure that appropriate environmental controls are available and used correctly;

**Administrative** – Minimise the risk by adopting safe and environmentally appropriate working practices or providing appropriate training, instruction or information;

**Personal Protective Equipment** – Make sure that appropriate PPE is available and used correctly.



The hazards, likelihood and pre-emptive measures assessments which follow use table A in assessing the environmental risks associated with the hazards identified.

# Transport Risk Module 1

## Purpose

This risk module forms part of the Broken Hill Brine Dam decommissioning. The activities associated with this module are related only to transport of waste salts to Cleanaway, Inkerman SA.

## Activities

Transport management involves:

- Collections of salts in basin of brine dam
- Loading of salts into trucks
- Travel along designated route to Inkerman SA.

This risk module describes the main hazards to human health or the environment associated with the transport of waste salts to SA.

The first table in the risk module lists the potential pollutants.

The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment.

In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as GTE1 Pty Ltd Environmental Management System Emergency Response. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 6 of this document are to be initiated.

Further details on the risk assessment and appropriate control methods can be found in the following documents:

- Broken Hill Brine Dam Decommissioning Project Management Plan
- GTE1 Pty Ltd Environmental Management System
- GTE1 Pty Ltd Work, Health & Safety Management System

The module has been written to cover general environmental hazards and their controls. As the site environmental management system is fluid, new documentation may better reflect the risks and controls.

<b>Transport of Waste Salts to Cleanaway, Inkerman SA</b>						
Site Name: Brine Dam			Responsible person: Sonje Finlayson		Date: April 2020	
<b>Waste Salts</b>	<b>Hazardous Chemicals</b>	<b>Map ref</b>	<b>Need for early warning<sup>1</sup></b>	<b>Pre-emptive action ref</b>	<b>Ref to safety coverage</b>	<b>Ref to Hazard and likelihood assessment</b>
<b>MATERIALS (stockpiles)</b>						
Dust generated from stock piled stocks	No	4.2	Only in extreme weather conditions	Dust suppression used (water cart)	GTE1 Pty Ltd Environmental Management System, Environmental Factors, Air Borne Elements	3.
<b>MATERIALS (loading)</b>						
Dust generated during loading	No	4.2	Only in extreme weather conditions	Dust suppression used (water cart)	GTE1 Pty Ltd Environmental Management System, Environmental Factors, Air Borne Elements	3.
<b>MATERIALS (transport)</b>						
Dust from load, loss of load in event of accident	No	4.2	no	All loads to be tarped appropriately.	GTE1 Pty Ltd Environmental Management System, Environmental Factors, Air Borne Elements	3
Salts entering the environment in the event of accident	No	4.2	No	All vehicles to be well maintained and driven appropriately	GTE1 Pty Ltd, Work Health and Safety System	
<b>MATERIALS (unloading)</b>						
Dust generated whilst unloading vehicles	No	4.2	Only in extreme weather conditions	Dust suppression system to be used	GTE1 Pty Ltd Environmental Management System, Environmental Factors, Air Borne Elements & receiving facilities protocols	3

<sup>1</sup> Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

<b>Hazard and Likelihood Risk assessment and Corrective Control Measures – Transport</b>								
Site Name: Brine Dam					Responsible person: Sonje Finlayson			Date: April 2020
<b>Waste Salts</b>	<b>Description of Hazard / Incident leading to hazard</b>	<b>Level of impact</b>	<b>Likely hood</b>	<b>Priority</b>	<b>Impact on neighbours</b>	<b>Control Measures Corrective Action</b>	<b>Responsible Person</b>	<b>Date</b>
<b>1. Dust generated during loading - transport - unloading Of waste salts</b>	Wind generating dusts during transport process	L	P	3	Unlikely but possible	<ol style="list-style-type: none"> <li>1. Sediment basin management procedure</li> <li>2. Staff induction and training</li> <li>3. Environment Incident procedure</li> <li>4. Dust suppression measures</li> </ol>	Sonje Finlayson	<b>April 2020</b>
<b>2. Roll over of vehicle / vehicle accident</b>	Salts entering the environment due to vehicle roll over Fuel spills Other automotive liquids – brake fluid, coolant etc	H	L	3	Unlikely	<ol style="list-style-type: none"> <li>1. Only mechanically sound trucks and trailers to be used</li> <li>2. All breaks tested on a regular basis and trucks serviced regularly</li> <li>3. Tyres to be maintained and with sufficient tread</li> <li>4. Qualified drivers at all times</li> <li>5. Drive to road conditions</li> <li>6. Driver to manage fatigue levels</li> <li>7. Driver to follow designated heavy vehicle route</li> <li>8. Driver to not be impaired by drugs or alcohol</li> <li>9. Speed limits to be adhered to</li> </ol>	Sonje Finlayson	<b>April 2020</b>
<b>3. Salts entering the environment</b>	Salts entering area adjacent to Brine Pond	M	L	3	Unlikely but possible	<ol style="list-style-type: none"> <li>1. Salts to not be removed from lined dam basin except in approved vehicles for transport</li> <li>2. Correct stockpiling and loading procedures to be followed.</li> </ol>	Sonje Finlayson	<b>April 2020</b>

## Dust Risk Module 2

### Purpose

This risk module forms part of the Broken Hill Brine Dam Decommissioning. The activities associated with this module generally relates dust production at the site.

### Activities

- Mechanical sweeping of salts from floor of brine dam
- Transportation of salts away from brine dam to Inkerman SA.

This risk module describes the main hazards to the environment associated with dust.

The first table in the risk module lists the potential pollutants.

The second table describes the potential pollution incidents with pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment. In the case of actual or threatened material harm to the environment or human health procedures must be followed for contacting authorities as in GTE1 Pty Ltd Environmental Management System Emergency Response. For incidents where pollution has the potential to impact on the community, early warning systems as described in section 6 of this document are to be initiated.

Further details on the risk assessment and appropriate control methods can be found in the following documents:

- Broken Hill Brine Dam Decommissioning Project Management Plan
- GTE1 Pty Ltd Environmental Management System
- GTE1 Pty Ltd Work, Health & Safety Management System

The module has been written to cover general environmental hazards and their controls.

<b>Dust – Brine Dam</b>						
Operational Area: Across the site			Responsible person: Sonje Finlayson		Date: April 2020	
<b>Name / description</b>	<b>Hazardous Chemicals</b>	<b>Map reference</b>	<b>Need for early warning<sup>2</sup></b>	<b>Pre-emptive action ref</b>	<b>Ref to safety coverage</b>	<b>Ref for Hazard and likelihood assessment</b>
<b>Dust</b>						
Dust from decommissioning activities	No	Map 4.2	Only if significant weather event occurs	See PMP	See WHS	3U

<b>Hazard and Likely hood Risk Assessment and Corrective Control Measures</b>								
Site Name: Brine Dam					Responsible person: Sonje Finlayson		Date: April 2020	
<b>Dust</b>	<b>Description of Hazard / Incident leading to hazard</b>	<b>Severity</b>	<b>Likely hood</b>	<b>Risk Factor</b>	<b>Impact on neighbours</b>	<b>Control Measures Corrective Action</b>	<b>Responsible Person</b>	<b>Date</b>
Dust from decommissioning activities	Dust impacting workers on site	L	3	U	May impact workers on site	<ol style="list-style-type: none"> <li>1. Staff training</li> <li>2. Dust suppression measures</li> <li>3. Monitoring weather conditions</li> </ol>	Andrew Finlayson	<b>April 2020</b>

<sup>2</sup> Early warnings relate to informing neighbours who may be affected by the emission of this substance. If this substance is of a type and quantity which may reach neighbours then early warning assessment of actions is required to be undertaken.

## APPENDIX 3 – REGULATORY REQUIREMENTS

### PIRMP Legislation

#### POEO Act Part 5.7

**153A Duty of licence holder to prepare pollution incident response management plan**

The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.

**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,
- (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,
- (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,
- (d) any other matter required by the regulations.

**153D Keeping of plan**

A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.

**153E Testing of plan**

A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.

**153F Implementation of plan**

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.

#### POEO (General) Regulation 2009

**98C(a) Hazards:**

A description of the hazards to human health or the environment associated with the activity to which the licence relates

**98C(b) Likelihood:**

the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,

**98C(c) Pre-Emptive Action:**

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,

- 98C(d) **Pollutant Inventory Types:**  
an inventory of potential pollutants on the premises or used in carrying out the relevant activity,
- 98C(e) **Pollutant Inventory Quantities:**  
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,
- 98C(f) **Safety Equipment:**  
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,
- 98C(g) **Staff Contacts:**  
the names, positions and 24-hour contact details of those key individuals who:  
are responsible for activating the plan, and  
are authorised to notify relevant authorities under section 148 of the Act, and  
are responsible for managing the response to a pollution incident,
- 98C(h) **Authority Contact:**  
the contact details of each relevant authority referred to in section 148 of the Act,
- 98C(i) **Early Warnings Neighbours:**  
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,
- 98C(j) **Staff Safety:**  
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,
- 98C(k) **Maps:**  
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,
- 98C(l) **Early Warnings General:**  
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,
- 98C(m) **Training of Staff:**  
the nature and objectives of any staff training program in relation to the plan,
- 98C(n) **Timing of Testing:**  
The dates on which the plan has been tested and the name of the person who carried out the test,
- 98C(o) **Updating of Plan:**  
the dates on which the plan is updated,
- 98C(p) **Plan Testing**  
the manner in which the plan is to be tested and maintained.
- 98D(1) **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.
- 98D(2) **Publishing Plan Parts:**  
(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.
- 98D(3) **Procedures under Act:**  
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).

98D(4) **Privacy Protection:**

(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).

98E(1) **Testing of the 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.

98E(2) **Minimum Testing:**

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

[Note EPA has stated this section will be amended in late 2020 or 2021 to remove *any pollution incident* to an incident which triggers the site's PIRMP or Material Harm]