DESCRIPTION:
Pollution Incident Response Management Plan (PIRMP) ~ Raglan | WHS_P_05A

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1.0 Purpose and Background

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the *Protection of the Environment Operations Act 1997* (POEO Act) and associated *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) for licensed facilities.

Under the Grainforce Emergency Management System, detailed emergency response procedures are already in place for the classification and management of incidents. Under the provisions of Part 3A 98B(2) of the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*, to allow for the integration of requirements into existing plans in respect to pollution incident response, requirements under POEO legislation have been integrated into these existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans and associated procedure. It also details additional supplementary site-specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

2.0 Scope

This PIRMP covers the Grainforce activities at **148 Ceramic Avenue, Raglan** . This plan applies to all activities, products and services on the site over which Grainforce has operational control. The scope will include training

through Tool Box talks, scenarios & desktop exercises. The objective being to maintain zero pollution incidents so far as reasonably practicable.

3.0 Legislative Requirements

Specific legislative requirements for the development and implementation of this PIRMP are provided in the following table.
Part 5.7A of the *Protection of the Environment Operations Act 1997 (POEO Act)*
Part 5.7A of the *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)*
The *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*
Environment Protection License (EPL) 1296

4.0 Terms and Definitions

4.1 Definition of a pollution incident

A *pollution incident* means an incident or set of circumstances during or as a consequence of which there 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 a premise, but it does not include an incident or set of circumstances involving only the emission of any noise.

4.2 Abbreviations

Abbreviation	Explanation
EPA	Environment Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
POELA Act	Protection of the Environment Legislation Amendment Act 2011
CLM Act	Contaminated Land Management Act 1997
EPL	Environment Protection License
ERP	Emergency Response Plan
EMS	Environmental Management System

5.0 Notification of a Pollution Incident

5.1 What must be notified

A pollution incident is required to be immediately notified if there is a risk of 'material harm to the environment', defined under section 147 of the POEO Act as:
(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 or 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.

5.2 Responsibility to notify

Under Section 148 of the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

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

Once determined that the incident causes or threatens material harm to the environment, notification must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident.

5.3 Emergency Response

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance (phone 000). The other response agencies must still be contacted after that to satisfy notification obligations.

5.4 Contaminated Land

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

6.0 Reference Documentation

The following existing internal plans and procedure documentation underpin this PIRMP.

Doc. No	Document
Licence No: 21073	[Category ~ A Risk Level ~ 1]
PROC_001	Chemicals: Storage & Disposal
PROC_011	Emergency Procedures
PROC_005	Risk Assessment & Hazard Reporting
WHS- F007	Hazardous Substances Risk Assessment Register

7.0 GEDS PIRMP

7.1 Description of Potential Hazards

An *environmental hazard* is a term for any situation or state of events which poses a threat to the surrounding environment.

Potential environmental hazards specific to Grainforce operations include:

Minor diesel spills/Leaks

Uncontrolled Gas Release e.g. methyl bromide

Dust Generation

7.2 Pre-emptive Actions to be Taken

Minor Diesel Spill/Leak; spill are available should they be required.	
Uncontrolled Release of Gas; all fumigations and subsequent venting activities are carried out by licensed fumigators under very tight controls.	

Dust Generation GEDS has in place, Operational Dust controls to mitigate potential dust emissions resulting from various activities onsite. Initiatives introduced to date include: # Road base aggregate on all traffic areas. # Scheduled watering of all traffic areas.	

Other pre-emptive actions taken to minimise the likelihood of potential environmental hazards include:

Onsite inductions for employees, contractors and suppliers;

Environmental inspections.

7.2.1 Risk Matrix

Identify Hazards and subsequent Risks	**Analyse Risks Evaluate Risks**			**Further Risk Treatments**		
Hazards/Issues/ Risks	**Consequence**	**Likelihood / Consequences**	**Risk level**	**What we are doing now to manage this risk**.	**New risk level**	**Further action needed Opportunities for improvement**
Chemical / Diesel Spills/Leaks	Exposure to employees	E-3	M	No chemicals are stored onsite and any major maintenance activities are undertaken by licenced third party contractors. Diesel is stored above ground with appropriate bunding; spill kits are located in areas where there is a potential for a spill to occur.	E-2	L
Uncontrolled Gas Release e.g. methyl bromide	Exposure to employees	E-3	M	All fumigation activities are conducted and managed by an external licenced contractor.	E-1	L
Dust Generation	Exposure to employees and neighbours.	D-2	L	GEDS has dust controls in place in place to mitigate potential dust emissions resulting from various activities onsite. Initiatives introduced to date include: # Road base aggregate on all traffic areas. # Scheduled watering of all traffic areas.	E-1	L
Flooding	Possibility of rainfall event causing uncontrolled runoff to water course.	E-4	H	Stormwater management, e.g. drainage diversions are well managed & in place.	E-3	M

Consider the **consequences** and **likelihood** for each of the identified hazards and use the table to obtain the risk level.

			Consequences				
			1 – Insignificant Dealt with in-house	**2 – Minor**	**3 – Moderate** Significant	**4 – Major** Extensive	**5 – Catastrophic**
Likelihood	**A -**	Almost certain to occur in most circumstances	High (H)	High (H)	Extreme (X)	Extreme (X)	Extreme (X)
	B -	Likely to occur frequently	Moderate (M)	High (H)	High (H)	Extreme (X)	Extreme (X)
	C -	Possible and likely to occur at some time	Low (L)	Moderate(M)	High (H)	Extreme (X)	Extreme (X)
	D -	Unlikely to occur but could happen	Low (L)	Low (L)	Moderate(M)	High (H)	Extreme (X)
	E -	May occur but only in rare and exceptional circumstances	Low (L)	Low (L)	Moderate (M)	High (H)	High (H)

How to Prioritise the Risk Rating

Once the level of risk has been determined the following table may be of use in determining when to act to institute the control measures.

Extreme	Act immediately to mitigate the risk. Either eliminate, substitute or implement engineering control measures.	Remove the hazard at the source. An identified extreme risk does not allow scope for the use of administrative controls or PPE, even in the short term.
High	Act immediately to mitigate the risk. Either eliminate, substitute or implement engineering control measures. If these controls are not immediately accessible, set a timeframe for their implementation and establish interim risk reduction strategies for the period of the set timeframe.	An achievable timeframe must be established to ensure that elimination, substitution or engineering controls are implemented. **NOTE:** Risk (and not cost) must be the primary consideration in determining the timeframe. A timeframe of greater than 6 months would generally not be acceptable for any hazard identified as high risk.

Medium	Take reasonable steps to mitigate the risk. Until elimination, substitution or engineering controls can be implemented, institute administrative or personal protective equipment controls. These "lower level" controls must not be considered permanent solutions. The time for which they are established must be based on risk. At the end of the time, if the risk has not been addressed by elimination, substitution or engineering controls a further risk assessment must be undertaken.	**Interim measures until permanent solutions can be implemented:** • Develop administrative controls to limit the use or access. • Provide supervision and specific training related to the issue of concern. (See Administrative Controls below)
Low	Take reasonable steps to mitigate and monitor the risk. Institute permanent controls in the long term. Permanent controls may be administrative in nature if the hazard has low frequency, rare likelihood and insignificant consequence.	

7.3 Potential Pollutants

There are no underground storage tanks on site; the only potential pollutant on site is diesel which is stored above ground in a dedicated / roofed bunded tank. No chemicals utilised for fumigation are stored on site and are managed solely by the fumigation contractor. Small quantities of oil may be stored on site occasionally for equipment top ups; when necessary these liquids will be stored on bunded pallets.

7.4 Safety Equipment

Under GDS Management Program, minimum Personal Protection Equipment (PPE) requirements are in place for all employees, contractors, visitors and transport operators. Minimum PPE includes high visibility clothing & enclosed footwear. Hard hats and safety glasses are required as & when stipulated. Onsite safety-related equipment includes:

- Onsite safety sign-in and inductions for all employees, contractors and suppliers
- Dust monitoring;
- Emergency evacuation;
- Spill kits;
- First aid kits;

7.5 Notification Procedure and Contact Details

Incident notification is detailed under the following sections of existing Grainforce ERPs; these procedures are available at the GEDS office.

Doc. No	Document Reference
PROC_011	Emergency Procedures Manual
PROC_005	Risk Assessment & Hazard Reporting

If, under application of internal incident classification procedures, an environmental incident is determined to have caused or threatened material harm to the environment at the GEDS site, the following internal and external stakeholders must be contacted immediately, in alignment with internal notification and escalation procedures. Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents. If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order.

- the **appropriate regulatory authority** (ARA)
- the EPA, if it is not the ARA
- the Ministry of Health via the local Public Health Unit
- the WorkCover Authority
- the local authority if this is not the ARA
- Fire and Rescue NSW.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.

7.5.1 Internal Notification Contact Details

Contact Position	Name	Contact Details
GEDS Director	Derek Larnach	Office: (02) 63314880 mobile: 0408 637 117
GEDS Director	Rodney Dunn	mobile: 0428635667

7.5.2 External Notification Contact Details

NSW Environment Protection Authority 131 555
(Pollution Hotline)
NSW WorkCover Authority 131 050
Fire and Rescue NSW 000
Bathurst City Council Phone: (02) 6333 6111

7.5.3 Other Key Stakeholders / Immediate Neighbour Notification Contact Details

The Raglan site, by way of its physical location, does not have immediate neighbours & is well isolated from the Raglan community and other businesses.

7.6 Communicating with the Local Community

7.6.1 Communication

Communication and updates regarding pollution incidents will be undertaken in accordance with existing procedure as detailed in existing ERPs. In the event of a notifiable incident, the appropriate emergency response plan and associated external communication process will be deployed.

Procedures for stakeholder communication are detailed under the WH&S Management System (PROC-011).

7.6.2 Immediate Neighbours

In response to the introduction of changes to 5.7 of the POEO Act, and as part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, immediate neighbouring properties will be notified, under the direction of Emergency Services with immediate response information.

7.6.3 Grainforce / GEDS Contact Details

Contact details for Grainforce are publicly available via local directories.

7.7 Minimising harm to persons on premises

At all times minimising harm to persons shall be a priority. In addition to information provided in Sections 7.2 and 7.5, detail of evacuation points for Raglan are provided on the attached map.

7.8 Training and Testing of the Plan

The Emergency Procedures Management Plan & the Pollution Incident Management Plan are reviewed on a twelve-month cycle & or as incidents occur. “RE-testing” of employees re their awareness of Grainforce Safety procedures is undertaken on a twelve-month cycle & documented to ensure an on-going understanding of Safety & Environmental procedures & requirements.

To date GEDS have not incurred any Pollution Incidents in the year’s past and are not likely to moving forward given the low risk factor for the site. For Testing purposes, we utilise desktop exercises & possible scenarios. As part of our Induction Process for new employees; they are made aware, trained & sign off on all our Site Safety Procedures. All contractors who conduct work at Grainforce are required to complete an induction prior to working on site.

Signed _____ Date:_____

Derek Larnach

Signed:_____ Date:_____

Rodney Dunn

Appendix 1 – Facility Maps ~ 148 Ceramic Avenue, Raglan

Boral CSR Bricks: BATHURST



Emergency assembly point

EVACUATION PROCEDURE

In an event of an emergency the siren will sound and evacuation procedures commence. The sound will necessitate all people to take the following actions:

- Stop machinery
- Move quickly - but do not run - to the area designated as the
  - Site Carpark.
- Leave all personal belongings behind
- Obey instructions from the Management team or Wardens.
- Remain at the assembly point until otherwise instructed by the Management team / Wardens

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GEDS
WH&S Management System

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