

Appendix F: Pollution Incident Response Management Plan

Introduction

This Pollution Incident Response Management Plan (PIRMP) has been prepared for the Moree Depot (NSW) site.

This Ammonia storage and distribution facility is not longer in operation. The site is located in an industrial zone on the outskirts of the Moree township.

If a pollution incident occurs at the premises so material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must immediately implement any PIRMP that was developed to meet the requirements of the POEO Act.

Objectives

The objectives of this PIRMP are to provide guidelines for pollution incident response procedures which would include:

- Comprehensive and timely communications regarding a pollution event to staff / contractors on site, relevant authorities and people outside the facility that may be impacted.
- All personnel at this site, including contractors working within the depot and, where applicable, by those contractors delivering dangerous goods and other materials to the depot, receive the appropriate level of training. The purpose of the training is to address the actions required for an effective and integrated response to incidents identified and addressed in this PIRMP.
- This PIRMP will supplement the Moree Emergency Response Plan and therefore should be read in conjunction with it. Individuals should consult with the Site Supervisor immediately, if in doubt about any aspect of this PIRMP.

Purpose and scope

The purpose of this PIRMP is to provide a framework to effectively, prepare for, respond to, and recover from a pollution incident in an appropriate manner. This includes identifying:

- Relevant legislation and guidelines for managing incidents and/or emergencies.
- The relationship of this PIRMP to other Moree plans and procedures where applicable.
- Roles and responsibilities to ensure proper implementation of the PIRMP, monitoring, auditing/inspections, and reporting, and responding to pollution incidents.
- 24-hour contact telephone numbers for key individuals and relevant authorities for incidents.
- A monitoring, auditing, and reporting framework to assess the effectiveness of this PIRMP.

This PIRMP is applicable to all Moree operational activities (i.e. chemicals storage transport and ancillary operations) and is applicable over the full duration of operation at the site.

The PIRMP will be co-ordinated by the Maintenance and Asset Manager. The role of the Maintenance and Asset Manager is to establish and implement the PIRMP, ensure that personnel are appointed to all emergency response roles, train and conduct evacuation exercises and emergency response drills, review the effectiveness of exercises and drills and to improve procedures.

Legislative and Regulatory Compliance

This PIRMP has considered the main requirements in accordance with the recent amendments to the Protection of the Environment Operations Act 1997 (POEO Act) and the NSW Environmental Protection Authority (EPA) Guidelines: Pollution Incident Response Management Plans (2022).

Relevant legislation

The key environmental legislation of relevance to environmental incidents includes:

- Protection of the Environment Operations Act 1997 (POEO Act).
- Dangerous Goods (Road and Rail Transport) Act 2008.
- Environmentally Hazardous Chemicals Act 1985.
- Contaminated Land Management Act 1997.
- Work Health and Safety Act 2011.

Guidelines and Standards

The following guideline was used to develop the Pollution Incident Response Management Plan.:

- Guideline: Pollution Incident Response Management Plans (2022)

General Requirements

Form of Plans

The PIRMP must be in a written form and readily accessible at the Moree depot and be able to be proved to an authorised EPA officer on request.

The PIRMP will be controlled electronically, and also available in hardcopy at the site in the event of an emergency where power and/or electronic access is unavailable.

Relationship with other emergency plans

This PIRMP will form part of the Moree Emergency Response Plan (ERP) and will directly reference the Moree Emergency management Plan (EMP)

Moree Depot has an integrated Health, Safety and Environmental management system (HSE system) designed to facilitate achieving zero harm. This system provides the foundation for effective HSE management and contains a compressive pack of global standards.

Moree site is required to ensure it has site specific standards and work instructions that are compliant with the HSE management system.

This would mean as part of compliance to IPL global standard, the Moree Depot has conducted a risk assessment to assess the nature and scale of potential hazards including potential impacts to neighbours, sensitive environments, and other industries. Appropriate controls to manage and mitigate the identified hazards must be implemented.

Identification, description, and likelihood of hazards

The potential scenarios which may lead to pollution are outlined in Appendix C of the Moree ERP. These include:

- Loss of containment – chemical spills.
- Fire.
- Vehicle Incidents
- Explosion.
- Bomb threat.
- Natural event – cyclones, storms and earthquakes.
- Structure fault or collapse.

- Electrical power failure causing systems shutdown.

The environmental impacts of the operation include emissions to air, contamination of land and/or soil, surface water discharges, flora and fauna impacts, noise and vibration, waste generation and sediment and erosion control.

Pre-emptive actions to be undertaken

Pre-emptive actions for preventing and responding to pollution incidents have been outlined in the following Moree Depot documentation:

- Environmental Management Plan
- Maintenance Programs for Plant and Equipment
- Bunding of storage tanks and drainage systems
- Fill control systems
- Job Step Analysis or Standard Work Instructions and associated risk assessments,
- Take 5! personal risk assessment
- Safe Act Observation task review.
- Spill Containment kits
- Hard stand areas where potential spills might occur
- Environmental monitoring,
- Daily site inspections

Inventory of potential pollutants

The inventories of potential pollutants at the Moree Depot are contained in Appendix A of the Moree Emergency Response Plan.

The ChemAlert list of chemicals is also stored onsite in the Manifest Box.

Safety Equipment

The Moree Site Supervisor is responsible for the provision and maintenance of safety equipment on site.

The location of the safety equipment and devices is shown in the Site layout map.

Contact details

Site contacts are listed in Section 3 of the site Emergency Response Plan. These contacts are authorised to contact relevant authorities and to initiate the PIRMP.

External emergency contacts required by Section 148 of the POEO Act are also listed in Section 6 of the site Emergency Response Plan.

In the event of an environmental incident that causes or may cause material environmental harm:

- Collect initial basic information of the incident on the Pollution Notification Record.
- Immediately contact the organisations; relevant authorities to be notified.
- If the incident presents an immediate threat to human health or property activate the Moree PIRMP.
- Record of the time that each of the authorities were notified and include these details on the incident report.

Communicating with neighbours and the community

The communication with the neighbours and community will be as per the Community Incident Notification Plan and the Moree EMP (refer Section 7).

Minimising harm to person on the premises

The Moree EMP contains the depot emergency response procedure.

This procedure includes actions to minimise the risk of harm to persons and the environment and are included as appendices to this document.

Actions to taken during or immediately after a pollution incident

The following actions should be undertaken during or immediately after a pollution incident:

- Notify all the relevant authorities immediately.
- Relevant authorities to be notified of this PIRMP and if required the wider community as per the Community Incident Notification Plan.
- Follow the Moree EMP - Site Emergency Response Procedures.
- This Procedure outlines the actions to be taken after and/or while the relevant authorities have been notified. Depending on the nature of the pollution incident this may include deployment of spill containment equipment, activation of storm water shut off and/or plant shut down.
- Initiate site cleanup.
- Investigation and reporting as per the IPL HSE system.
- Contacting insurance providers, as required.

Staff training

All relevant persons including contractors must be aware of the new requirements and trained in relation to this PIRMP. Training is to be undertaken in accordance IPL HSE management system:

- Staff will undergo annual training to ensure they are competent to undertake activities associated with emergency response.
- The training of each employee shall be recorded, and the records of training shall be kept at the relevant site and within the IPL training database.
- The relevant training shall be provided to all new employees prior to then undertaking work on site.

Making Plans Available

The PIRMP will be maintained at the Moree Depot so that it is readily available to those responsible for its implementation and authorised officers on request.

Sections of the PIRMP must be made publicly available within 14 days of it being prepared, this can be done by placing the relevant sections on IPL web site or providing a copy to anyone that makes a written request. This information will include:

- The procedure for contacting the relevant authorities.
- The Communication Plan which outlines how communication with the community will occur.
- This Communication Plan will be exclusive of any personal information.

Monitoring

Although this depot is licensed with the EPA, monitoring does not form a requirement of this licence. Therefore, no monitoring has been undertaken for the depot and no monitoring data is published for this site.

Testing Plans

The Maintenance and Asset Manager is responsible for ensuring that the PIRMP remains current and is reviewed and tested annually.

This PIRMP must be tested annually (or tested within one month of any pollution incident occurring) to ensure that the information included is accurate, up to date and the implementation is effective and efficient.

The testing will typically be practical exercises and trial desk top simulations. The testing must cover all components of the PIRMP including an assessment of the effectiveness of training.

Records of the emergency response drills, testing and actions will be maintained in the IPL Safety Management System database (SHAERS).

Details of the plan testing, and updates will be maintained in the sites management system and will include the information in the below table.

Implementing Plans

Incident Reporting is undertaken as per Section 6 of the Moree Environmental Management Plan and describes the process that will be followed to determine whether a pollution incident has caused actual or potential material harm to the environment.

If the pollution incident has caused actual or potential material harm to the environment, the relevant authorities must be notified immediately.

In the event of an environmental incident that causes material environmental harm, the Maintenance Manager or Senior Environmental Specialist will contact the relevant authorities.

The Site Coordinator shall.

- Collect initial basic information of the incident on the Pollution Notification Record
- Then immediately contact the organisations to be notified in accordance with the recent amendments to the POEO Act.
- Communicate with neighbours and local community
- Follow Moree Depot EMP procedures.

Required information

Incident details must be reported to enable appropriate follow-up action and should include:

- Time, date, nature, duration, and location of the incident.
- Location where pollution is occurring or is likely to occur.
- The nature estimated quantity or volume and the concentration of any pollutants involved, if known.
- Circumstances in which the incident occurred (including the cause of the incident, if known).

Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If all the required information is not known at the time of reporting, these details must be notified to all relevant authorities immediately after they become known.

Pollution Incident Notification Record

BASIC INCIDENT INFORMATION			
Ref	Incident Details	Complete this section.	
A	Person Reporting		
B	Position of Person Reporting		
C	Incident time/date		
D	Event Type	Actual/Potential	Spill/Leak/Escape/Deposit
E	Estimate volume		
F	Pollutant type		
G	Nature and location of incident		
H	Initial Response		

REGULATING AUTHORITIES – CONTACT DETIALS	
Relevant authorities	Phone number
Emergency Services (only actual events)	000
Moree Plains Shire Council	(02) 6757 3222
EPA Pollution Line	131 555
Armidale Region EPA	(02) 6773 7000
Ministry of Health	(02) 9391 9000
Public Health Unit – Tamworth Office	(02) 6764 8000
Safe Work NSW	13 10 50

SUGGESTED SCRIPT
<p>My name is (A) and I am the (B) from IPF Moree</p> <p>I am calling to inform you that at (C) our site had a (D) of approximately (E) of (F)</p> <p>This occurred at (G).</p> <p>Our initial response has included (H)</p>

Conversation Records

RECORD OF CONVERSATION			
Regulator	Emergency Services - 000		Time contacted
Contact Made	Spoke with a person		Left a message
Contact Name		Contact Position	
Regulator Recommendations or Directions			

Regulator	EPA Pollution Line - 131 555		Time contacted
Contact Made	Spoke with a person		Left a message
Contact Name		Contact Position	
Regulator Recommendations or Directions			

Regulator	NSW Health - 1800 020 080		Time contacted
Contact Made	Spoke with a person		Left a message
Contact Name		Contact Position	
Regulator Recommendations or Directions			

Regulator	Safe Work NSW – 13 10 50		Time contacted
Contact Made	Spoke with a person		Left a message
Contact Name		Contact Position	
Regulator Recommendations or Directions			

Regulator	Moree Plains Shire Council - (02) 6757 3222		Time contacted
Contact Made	Spoke with a person		Left a message
Contact Name		Contact Position	
Regulator Recommendations or Directions			

Community Incident Notification Plan

(INTERNAL USE ONLY)

The Emergency Response Plan for Moree outlines how site personnel will operate and manage an incident which has on-site and off-site impacts which may affect the surrounding community.

The Community Incident Notification Plan outlines how the community will be notified and what steps the community can take to ensure that they are safe during an incident.

Information to the community:

Information will be made available to the community via the IPL Website.

Incident / Emergency Scenarios:

Examples of incidents / emergency applicable to this site are:

- Loss of containment – chemical spills.
- Fire.
- Vehicle Incidents
- Explosion.
- Bomb threat.
- Natural event – cyclones, storms and earthquakes.
- Structure fault or collapse.
- Electrical power failure causing systems shutdown.

Steps taken by the Moree team to manage an incident and an emergency.

For an Incident with potential on-site or offsite impact - Notification Protocol

- Site Coordinator activates the Emergency Response Plan which includes immediate notification to the regulators and emergency services of an incident.
- Site Coordinator to notify Maintenance and Asset Manager
- Maintenance and Asset Manager is to notify Legal, Chief Risk Officer, Group Corporate Affairs by phone / email of an incident with the following information:
 - Location:
 - Date:
 - Time:
 - Description of Incident:
 - Description of Employee Safety:
 - Impact of the issue:
 - Confirmation of notification to regulators and emergency services:
 - Approximate time to resolve the issue:
 - Resolution action:
- Maintenance and Asset Manager (or authorised delegate) to act as Liaison Officer during a potential incident or emergency.
- Emergency Services (Police, Fire Brigade, HAZMAT and Ambulance) are the lead combat agencies for emergencies which have potential on and off-site impacts.
- IPL Liaison Officer to coordinate with Group Corporate Affairs and seek approval from Emergency Services to issue a community update which may take the form of:
 - Notice to IPL Website, or.
 - Notice to Local Radio and TV, or
 - Incident Update – pamphlet drop to nearby residents
- Maintenance and Asset Manager to advise Group Corporate Affairs that the incident is closed.

Notifiable Incident Types

Types of Incidents and Community Notification Requirements	
Minor Local Incidents	
Description <ul style="list-style-type: none"> • Contained to a limited area of site. • Does not impact the rest of site or offsite. • Response managed by plant personnel. 	Examples <ul style="list-style-type: none"> • medical emergency, • local leak, • small fire, • equipment/structural failure, • unstable plant operation.
Community Notification – no notification required.	
Moderate Site Incidents	
Description <ul style="list-style-type: none"> • Potential to affect all personnel on site. • May require assistance from all site resources. • Does not impact offsite. 	Examples <ul style="list-style-type: none"> • Small toxic gas or corrosive liquid leak, • Fire. <p>Siren will sound to alert onsite personnel.</p>
Community Notification – Consider community notification to website.	
Major Site Incidents or Emergencies	
Description <p>If there is a potential immediate threat to health:</p> <ul style="list-style-type: none"> • Immediately contact 000 • Emergency services are the designated responders (e.g., Fire and Rescue NSW, NSW Ambulance, NSW Police). • Site Emergency Management is still activated. <p>Some Off-Site Emergencies will also be On Site.</p>	Examples <ul style="list-style-type: none"> • Significant toxic gas or corrosive liquid leak, • Explosion • Large Fire. • Fatality <p>Siren may sound to alert onsite personnel.</p>
Community Notification: <ul style="list-style-type: none"> • Incident Notification to IPL website • Depending on advice from Emergency Services: <ul style="list-style-type: none"> • Emergency services are responsible for community notification. • Moree team will work with Emergency Agencies to notify the community with further updates. • Moree team will work with Government agencies to provide technical information 	
What does the siren mean?	
<p>The purpose of the Emergency Siren at the site is to alert onsite workers and initiate an onsite emergency response if needed.</p> <p>The Siren is not used to alert the public to danger.</p> <p>Moree site uses the siren during emergency drills.</p>	