



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

SOUTH COAST LIQUID TREATMENT MOBILE PLANT SOUTH NOWRA NSW

PREPARED BY

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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
LICENCE NUMBER: 20819

Approved by: Mr. Roger Walker

Position/Title: Director

Signature:

Date: 9th July 2021

PURPOSE:

South Coast Liquid Treatment holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for a Mobile Plan, for the treatment of Perfluorinated Chemicals . As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed mobile plant, or where the activity takes place and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Licensees should also refer to the EPA's *Guideline: Pollution incident response management plans*.

1.0 Environment Protection Licence (EPL) Details

Name of licensee: SOUTH COAST LIQUID TREATMENT - ABN 71057671717

EPL number: 20819

Premises name and address: Mobile Plant as necessary and contracted

Company or business contact details
Name: Mr. Roger Walker
Position or title: Director
Business hours contact number/s: 02 44210000
After hours contact number: 0412429221
Email: roger@liquidtreatment.com.au

Website address: www.liquidtreatment.com.au

Scheduled activity/activities on EPL: Waste Processing (non-thermal treatment)

Fee-based activity/activities on EPL: Non-thermal treatment of Perfluorinated Chemicals

2.0 Pollution incident – person/s responsible

PIRMP activation **Name of person responsible:** Roger Walker, John Walker
Position or title: Director
Business hours contact number/s: 02 44210000
After hours contact number/s: 0412429221, 0412457258
Email: roger@liquidtreatment.com.au

Notifying relevant authorities **Name of person responsible:** Mr. Roger Walker
Position or title: Director
Business hours contact number/s: 02 44210000
After hours contact number/s: : 0412429221
Email: roger@liquidtreatment.com.au

Managing response to pollution incident **Name of person responsible:** Mr. Roger Walker
Position or title: Director
Business hours contact number/s: 02 44210000
After hours contact number/s: : 0412429221
Email: roger@liquidtreatment.com.au

3.0 Notification of relevant authorities

Persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

Relevant authorities as appropriate to the location of the mobile plant , but include:

1. Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (first notification)
 2. EPA – 131 5553.
 3. NSW Health Wollongong Public Health Unit (Illawarra Shoalhaven LHD)
 Locked Bag 9, Wollongong 2500
 Phone: (02) 4221 6700, Fax: (02) 4221 6759 (secure line)
 After hours: Phone: (02) 4222 5000 (Wollongong Hospital) - - ask for Public Health Officer on call
 4. SafeWork NSW – Contact number 131 050
 5. Shoalhaven Council Phone: Contact number: 02 44293111.
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- | | | |
|---|-----------------|-------------|
| 6. Fire & Rescue NSW / Rural Fire Service
Nowra: | Contact number: | 02 44214754 |
| 7. EPA Wollongong: | Contact number: | 131555 |
| 8. SafeWork NSW - Nowra | Contact number: | 131050 |
| 9. Roads and Maritime Services Nowra: | Contact number: | 13 77 88 |

4.0 Notification of neighbours and the local community

Owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises:

Adjoining neighbouring land occupiers from time to time.

The neighbours will be informed of the incident, including early warnings and regular updates by phone or door knock.

5.0 Description and likelihood of hazards

The following is a description of the hazards to human health or the environment associated with the activity to which the licence relates:

1. Tank failure during heavy rainfall that may compromise bunding
2. Transfer pipe or valve failure during heavy rainfall that may compromise bunding
3. Full tanker on site accident before or during unloading
4. Mixture of incompatible compounds that could cause fire or explosion.

The Likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood, as follows:

1. The failure of a tank is unlikely, as the tank walls are inspected daily – increase of likelihood brought about by vehicle impact
2. Pipeline and valve failure is low risk of failure - increase of likelihood brought about by vehicle impact
3. Full tanker accident before or during unloading is low – vehicle speeding increases the likelihood
4. Mixture of incompatible compounds that could cause fire or explosion, likelihood is low due waste managed is of low volatility or of low concentrations in the case of M250 waste.

The following are detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises, occupied by a working mobile plant:

1. Tank walls and connections are inspected daily for potential failure; tanks are inside bunded areas capable of containing the volume of the largest tank plus 10%.
2. Transfer pipe work and valves are inspected daily for potential failure and replaced as necessary; vehicle speed in area is limited to 5km/hr; pipes and valves are kept inside bunded areas not accessible to vehicles.
3. Vehicle speed at work site is kept to 5 km/hr; unloading occurs on sealed areas that drain to a site sump capable of containing the volume of the largest tanker plus 10%.
4. Strong oxidants are stored or handled with buffer distances from hydrocarbons to prevent splash across those distances or mixture of incompatible compounds.

6.0 Inventory of pollutants

Provide an inventory of potential pollutants on the mobile plant site or used in carrying out the activity to which the licence relates:

The maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.

Location/Tank	Max. quantity	Contents	Comments
In site shed	100kg	polymer	Weatherproof storage
	1,000 L	Lubricating oil	Weatherproof storage
	200kg	Activated Carbon	Weatherproof storage
Bunded Tank Farm	10 T	wash water impacted by Perfluorinated Chemicals I	Polypropylene tank storage
	10 T	Treated water	Polypropylene tank storage

7.0 Safety equipment

Description of the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

The mobile plant is equipped with the following safety equipment:

1. PPE for all staff comprising safety high vis clothing, safety boots, leather and high nitrile gloves, eye protection goggles, dust masks P2, & hearing protection.
2. Two spill kits for oily water and mineral hydrocarbons.
3. Collection sump to accept the largest tank contents plus 10%
4. Bunded areas for all tanks to contain the volume of the largest tank plus 10%
5. Fully man proof fence and gates to the whole site
6. High level alarms to all tanks
7. Site supervision of all operations, loading and unloading exercises.

8.0 Communicating with neighbours and the local community

The details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises where the scheduled activity is carried out:

The following mechanisms are maintained on sites of the mobile plant operation, to update and provide early warning to owners and occupiers of premises in the vicinity of the site:

1. All adjoining neighbours phone numbers are kept on record at the site office and recorded on supervisory staff mobile phones.

2. The vicinity neighbours are contacted by phone to check for complaints and comments on the operation of the site.

Specific information that is provided to the community, to minimise the risk of harm:

1. Advise the vicinity neighbours of any waste that the NSW EPA require the site to accept in an emergency and advise if this waste
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9.0 Minimising harm to persons on the premises

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 out:

1. All staff have received training in the operational requirements of the site to ensure risk of harm is minimized and reminded at Toolbox meetings of these procedures.
 2. All staff are issued with PPE and instructed to wear same as a condition of employment.
 3. Drivers entering the site are instructed to keep vehicles to 5 km/hr maximum speed.
 4. All visitors are received at the site office only and escorted whilst on site.
 5. All tanks, pipework and valves are checked for integrity daily and replaced or repaired immediately should a fault be likely.
 6. Staff are instructed to immediately report “out of performance” equipment.
 7. Vehicles are prohibited from entering the site without prior approval.
 8. The site fences and gates are kept in good order.
 9. Gates are kept locked when the site is not in operation or occupied.
 10. The site security system is regularly maintained and checked.
 11. The phone communication system is by mobile phones on site.
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10.0 Actions to be taken during or immediately after a pollution incident

The Detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution.

10.1. EVACUATION PROCEDURES

This procedure covers this site in case of an evacuation from an Emergency. The Evacuation Coordinator implements the following procedures:

- ◆ The types of emergencies that could lead to a site or partial site evacuation are: (the following list is not exhaustive):
 - a. Fire, various types.
 - b. Spill of a Dangerous Good (DG).
 - c. Major gas leak.
 - d. Bush fire or other natural disasters – e.g. floods, earthquake, or major electrical, hail or other storm.
 - e. Robbery – armed Hold-up.
 - f. Bomb threat or terrorist activity.
 - g. Neighbourhood emergency.
 - h. Civil incident or serious traffic incident.
 - i. Medical Emergency.
- ◆ When the 'evacuation alarm' is sounded (the air horn), all employees operating equipment must shut down it immediately. This is done safely by pressing the E-Stop or other approved shutting down method.
- ◆ Additionally, all personnel onsite are to assembly at the initial assembly point, which is located just outside the amenities area, on the main driveway. Move to this point in a brisk but orderly way. DO NOT RUN! The Evacuation Coordinator will check all areas to ensure all personnel are accounted for.
- ◆ Access to the assembly points is displayed on the 'Evacuation Plan'. The exits, various access/egress routes, and assembly points are also displayed. These plans are displayed at various locations around the site.

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- ◆ At this time, the Evacuation Coordinator will decide on the correct course of action. It may include waiting beside the main reception area, moving orderly to the outside assembly point - western side of Tom Thumb Avenue in the car park. The Emergency Services may be called, if required.
- ◆ All employees and visitors onsite shall be accounted for.
- ◆ The Evacuation Coordinator will discuss the situation, including any unaccounted-for personnel, with the Emergency Services. Together, they will decide when it is safe to return to the site. In the event of the Emergency Services not being present the Evacuation Coordinator in consultation with the Operations Manager will decide when it is safe to return to the site.
- ◆ **Note:** Never try to extinguish the fire alone. Ensure your own safety! Report the fire ASAP to your Supervisor / Manager and then follow the instructions from the Evacuation Coordinator.

Always obey the requests from the emergency personnel and emergency services.

10.2 IN THE EVENT OF A MAJOR CHEMICAL INCIDENT

Please note: “This mobile plant is a waste facility.” At the end of each day or before rainfall all open areas are cleaned.

The South Coast Liquid Treatment site has been specially designed, with bunded areas to contain any spills onsite. Any small spills are contained into the specific work area which is emptied daily.

There are several ways a major chemical spill could occur.

1. Bund and tank rupture.
2. Vacuum tanker malfunction.
3. Vandalism where containers are ruptured.
4. Other mobile machinery incident.
5. Natural disaster.

There are two types of major chemical spills:

1. Onsite: where all the spillage is controlled by the bund system.
2. Offsite: where the spillage flows offsite onto adjoining properties or roadways or stormwater channels.

In the event of a major spillage, or contamination to personnel, the following procedure is to be followed:

1. A no-go 5m radius is to be established around the affected area and this area shall be evacuated at once.
2. Consult with the Operations Manager and Site Supervisor for the MSDS of the spilled chemical, if applicable.
3. Coordinators are to be satisfied that it is safe to enter the area to conduct a clean-up.

10.3. IN THE EVENT OF A BOMB THREAT OR TERRORIST ACTIVITY

1. Above all: Keep calm and do not alarm employees and visitors.
2. If threat is by telephone:
 - a. Prolong call - keep person talking and ask:
 - i. Location of Bomb
 - ii. Time Set to Explode
 - iii. Record information for Police as well as any other relevant information as shown on the 'Bomb Threat Checklist'
3. Report call to the Operations Manager.
4. If object found:
 - a. Do not touch
 - b. Report finds

c. Keep areas clear and evacuate the site in an orderly manner.

5. Basic Rules:

- a. Treat as genuine
- b. Record exact information (using checklist if possible)

6. Evacuate if required by Emergency Services or Evacuation Coordinator.

10.4 IN THE EVENT OF A MAJOR FIRE INCIDENT

In the event of a fire on site the following procedure is to be followed:

1. Ensure you own safety. Alert all other employees to the incident of the fire;
 2. Turn off adjoining power;
 3. If you are trained in the use of fire extinguisher and the fire is less than 1 cubic metre, select the correct extinguisher for the type of fire and try to extinguish the fire. If unable to do this, sound the evacuation siren (air horn) and / or push one of the emergency response buttons which automatically call the emergency services;
 4. Follow the evacuation procedure as already stated;
 5. If the fire has been extinguished prior to the emergency services arrival, the Evacuation Coordinator will delegate an employee to ring them and explain the situation;
 6. **Please Note: It is very important not to attempt to extinguish the fire alone. Report it and sound the alarm.**
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10.5 IN THE EVENT OF A MAJOR GAS LEAK

Whilst it is uncommon to have noxious, flammable, explosive or health affecting gasses present on site, the actions in the event of a major gas leak must be established. In the event of a major gas leak, the evacuation procedure needs to be followed immediately.

1. Ensure your own safety. Alert all other employees to the incident of a major gas leak;
2. Isolate electrical supply to the area;
3. Activate the evacuation siren. Notify the emergency services if there is a fire with the gas leak;
4. Seal the gas leak if practical;
5. When the emergency services arrive, explain the situation to them with the facts that have transpired.
6. Normal work must not be resumed until the Operations Manager, Site Supervisor and Evacuation Coordinator are satisfied that it is safe.

10.6 IN THE EVENT OF A BUSHFIRE OR OTHER MAJOR NATURAL DISASTER.

The natural disasters that may occur include bushfires, floods, earthquakes, and hostile storms (i.e. electrical failure, hail, and / or high wind) require:

1. With this type of emergency, a partial or full evacuation could be required.
2. With a bushfire, the emergency services must be advised ASAP. Follow the procedure for 'In the event of a major fire' but be aware that the main assembly point may be moved if required by the Evacuation Coordinator or external emergency services.
3. With the other types of major natural disasters, it is important to stay indoors away from falling debris, glass etc.

4. After the disaster has passed a site inspection must be undertaken by the Evacuation Coordinator, Site Supervisor & Operations Manager to ascertain when it is safe to return to work.

Others:

1. In the event of a neighbourhood emergency and / or a serious traffic incident, the Evacuation Coordinator will assess the situation and decide on the correct and safest course of action for the site.
2. With a Civil Disorder near the site, it is important that the Emergency Services be contacted immediately.
3. All employees are to attempt to restrict access to the site, stay calm, and minimize contact to avoid antagonizing any group associated with civil disorder, however their access to the site needs to be prevented. Access to tanks and valves needs to be prevented.

10.8 IN THE EVENT OF A SERIOUS MEDICAL EMERGENCY.

1. Assess the situation and make safe if able to do so.
2. Remain with the person, if possible, and send another person for the nearest First Aider. Provide appropriate support.
3. Do not move the person unless they are in a life-threatening situation.
4. The First personnel may request the Emergency Services be notified ASAP. One employee will be designated to meet the ambulance and guide them to the patient.
5. Debrief the incident, document, and investigate and action to prevent a reoccurrence, if applicable.

10.9 HOW ANY IDENTIFIED RISK OF HARM TO HUMAN HEALTH

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:

All personnel must be made aware of their work environment.

1. Start at the location of the Safety Hazard Board situated in the lunchroom and go over the Emergency Procedures. Review the Evacuation Procedure and Plan and show where the main features are located and where the Initial and Final Assembly Points are (at the car park in Tom Thumb Avenue).
2. Conduct a tour of the site to highlight activates in the workplace, amenities, emergency and first aid equipment.
3. All training on site is recorded on each employee's personal training register with a copy kept on their personnel file.

10.10 ACTIONS TO BE TAKEN IN COMBATING THE POLLUTION

Actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

See sections 10.1 to 10.9 above.

11.0 Coordinating with persons

The procedures to be followed for coordinating with the authorities or persons who have been notified:

The following person/s through whom all communications are to be made immediately in the event of a relevant event – the Nowra authorities are detailed to cover works in the Shoalhaven Area:

1. Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (first notification)
2. EPA – 131 5553.
3. Wollongong Public Health Unit (Illawarra Shoalhaven LHD)
 Locked Bag 9, Wollongong 2500
 Phone: (02) 4221 6700, Fax: (02) 4221 6759 (secure line)
 After hours: Phone: (02) 4222 5000 (Wollongong Hospital) - - ask for Public Health Officer on call
4. SafeWork NSW – Contact number 131 050
5. Shoalhaven Council Phone: Contact number: 02 44293111.
6. Fire & Rescue NSW / Rural Fire Service Contact number: 02 44214754
 Nowra:
7. EPA Wollongong: Contact number: 131555
8. SafeWork NSW - Nowra Contact number: 131050
9. Roads and Maritime Services Nowra: Contact number: 13 77 88

12.0 Staff training

The nature and objectives of any staff training program in relation to this plan are:

The main objectives are:

1. All personnel must be made aware of their work environment;
2. All personnel must be aware of the required reactions and procedures and their obligations, related to an event that could lead to potential contamination to the staff or the environment.
3. All personnel must be aware of the likely events that could lead to contamination of personnel or the environment and the risk minimizing procedures in place at the site.

The staff training procedure will encompass:

1. Start at the location of the Safety Hazard Board situated in the lunchroom and go over the Emergency Procedures.
 2. Review the Evacuation Procedure and Plan and show where the main features are located and where the Initial and Final Assembly Points are (at the nominated site assembly area – previously nominated before works commence).
 3. Conduct a tour of the site to highlight activities in the workplace, amenities, emergency and first aid equipment.
 4. All training on site is recorded on each employee's personal training register with a copy kept on their personnel file.
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13.0 Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.

The manner in which the **plan is to be tested and maintained** to ensure 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 is as follows:

1. A simulated tanker impact on sensitive site component, tank, pipeline and valve failure are independently proceeded with and the staff are observed in the performance of their duties.
2. A Toolbox meeting is called immediately after the simulated event and the methodology and steps to increase efficiency discussed for implementation and amendment to procedures adopted, as necessary.
3. The testing is documented in a site diary. Including the equipment tested, the date and names of staff members involved in the tests.

Details of the date on which the plan was updated required to be recorded:

PIRMP testing details

Date tested	Tested by - Name (to include the names of all people involved in testing)	Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan.	Finding of test, including issues identified	Next scheduled testing date (must be within 12 months from current test)

15.0 PIRMP update details

Date update occurred	Reason for update (e.g. address issues identified in testing, contact details/personnel have changed)	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Date of completion
e.g. 24.02.19	Outdated items identified in annual testing	Contact details, map and pollutant inventory updated	26.02.19	26.02.19