



WOLLONDILLY CHPP

Pollution Incident Response Management Plan

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1 Introduction

1.1 Key Aspects of the Pollution Incident Response Management Plan

This Pollution Incident Response Management Plan (PIRMP) covers the key actions to minimize occurrence of a pollution incident and manage a pollution incident if one occurs (during and after a pollution incident). The PIRMP does not have procedures for the treatment of injured persons or the remediation of the environment following a pollution incident.

The PIRMP has been prepared for managing the impact to human health (employees and nearby neighbours) and the environment (both onsite and offsite).

1.2 Background to Wollondilly Site

Wollondilly Site was originally established in the late 1950s as a coal washing facility and stockpile area to receive coal transported by road and conveyed from the Burragorang Valley Mines. The washing process is basically a mechanical separation of the higher quality coal from the shales and low carbonaceous materials. The product coal was then loaded onto trucks for transport to either the Glenlee Site or Port Kembla coal loader. The remaining material, referred to as reject was then emplaced on site.

To support the Washery, a small workshop was established for general equipment maintenance while a fuel storage facility and truck wash was established to support the truck transport fleet. The vast majority of the site was used for reject emplacement.

The original plant operated between 1958 and 2000. Between 2008 and present, the Washery throughput was from reprocessing the existing reject emplacement. The reprocessing operation recovers the remaining coal from the earliest operation of the site.

The Wollondilly Site currently operates under Environmental Protection Licence (EPL) 641.

1.3 Site Facilities

The Wollondilly Site covers an area of approximately 313.6 ha (85 ha disturbed and in use) which includes an office and car parking area, coal handling and processing infrastructure, product coal stockpiles, reject disposal areas, access roads, truck wash, and fuel storage facilities. A general site layout is shown on Annexure 2, which also shows the current pollution control system.

1.4 Pollution Control

Drainage from the site is controlled by internal drainage channels which all drain to a sedimentation dam which in turn drains to a clean water dam. The site recovers water from this clean water dam for use in the reject re-processing operation and the truck wash. The Wollondilly site has a total of 54.5 ML of pollution control storage with spillway capacity to enable safe passage of the Probable Maximum Flood Event.

The current water management system on site was developed and implemented to contain and treat dirty water generated as runoff from the site. The main aims of the system are:

- ☐ To contain all dirty water within the approved site;
- ☐ To control sediment – use of pollution control ponds allow sufficient settling time for dirty water so that clear water can be discharged off site as required; and

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- ☐ To treat water held on site so that it is of sufficient quality to be discharged off site in accordance with EPA licence conditions.

All runoff from disturbed land is treated in one or more pollution control dams and is held on site. The principal components of the water management system are as follows:

- ☐ Workshop and Service areas currently drain to the sedimentation dam;
- ☐ Solids from the Truck Wash are captured in a sediment pond;
- ☐ Diesel tanks and drum storages are fully bunded and dewatered as required. All bunded areas have been designed to contain at least 110 % of tank capacity. There would be normal levels of hydrocarbon contamination within the bunded area; and
- ☐ Effluent generated from toilets is piped to a septic tank system. Solid material is removed from the tanks as required by a licensed contractor.

2 Requirement to Prepare the PIRMP

2.1 Legislative Requirement

The specific requirements for the PIRMP are set out in Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009* (POEO (G) Regulation). In summary, this provision requires the following:

- ☐ All holders of environmental protection licences must prepare a Pollution Incident Response Management Plan (section 153A, POEO Act);
- ☐ The plan must include the information detailed in the POEO Act (Section 153C) and be in the form required by the POEO(GO Regulation (clause 98B);
- ☐ Licensees must keep the plan at the premises to which the environment protection licence related or, in the case of trackable waste the transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act);
- ☐ Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E); and
- ☐ If a pollution incident occurs in the course of any activity so that the material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

2.2 Structure of PIRMP

Table 1 outlines the structure of the PIRMP, as per the requirements of the POEO(G) Regulation.

Table 1: Requirement to Prepare PIRMP

Clause Number	Requirement	Section in Plan
98 C (1) (a)	A description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity)	Section 5
98 C (1) (b)	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	Section 5

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Clause Number	Requirement	Section in Plan
98 C (1) (c)	Details of the pre-emptive action to be taken to minimize or prevent any risk of harm to human health or the environment arising out of the relevant activity	Section 9.1
98 C (1) (d)	An inventory of potential pollutants on the premises or used in carrying out the relevant activity	Section 6
98 C (1) (e)	The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates	Section 6
98 C (1) (f)	A description of the safety equipment or other devices that are used to minimize the risks to human health or the environment and to contain or control a pollution incident	Section 7
98 C (1) (g)	The names, positions and 24 hour contact details of those key individuals who: <ul style="list-style-type: none"> (i) Are responsible for activating the plan, and (ii) Are authorized to notify relevant authorities under section 148 of the Act, and (iii) Are responsible for managing the response to a pollution incident 	Section 10.1
98 C (1) (h)	The contact details of each relevant authority referred to in section 148 of the Act	Section 10.2
98 C (1) (i)	Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried out	Section 11
98 C (1) (j)	The arrangements for minimizing the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Section 8
98 C (1) (k)	A detailed map (or set of maps) showing the location of the premises to which the licence relates, the	Annexure 2

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Clause Number	Requirement	Section in Plan
	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 storm water drains on the premises	
98 C (1) (l)	A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warning, updated and the action to be taken during or immediately after a pollution incident to reduce that risk	Section 9
98 C (1) (m)	The nature and objectives of any staff training program in relation to the plan	Section 12
98 C (1) (n)	The dates on which the plan has been tested and the name of the person who carried out the test	Section 14
98 C (1) (o)	The dates on which the plan is updated	Front page
98 C (1) (p)	The manner in which the plan is to be tested and maintained	Section 14

3 Definition of a Pollution Incident

The POEO Act 1997 defines a pollution incident as:

'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'.

3.1 Notifiable Pollution Incidents

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

- (a) Harm to the environment as 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.

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Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

4 Immediate Notification of Pollution Incident

Pollution incidents are required to be notified '*immediately*' (section 148 POEO Act). This means that all Appropriate Regulatory Authorities (contact details can be found in Table 5) must be notified of the incidents without delay. These authorities include:

- ☐ Environment Protection Authority (EPA);
- ☐ Ministry of Health;
- ☐ WorkCover Authority;
- ☐ Local Council; and
- ☐ Fire and Rescue NSW.

5 Description and Likelihood of Hazards and Pre-emptive Actions

This section has been prepared to meet the requirements of clause 98 C (1) (a), (b) and (c) of the POEO(G) Regulation.

The identified potential hazards that may occur at Wollondilly Site are outlined in Table 2, including the likelihood or otherwise of these hazards occurring and the existing controls and pollution response measures relating to the hazards.

Table 2 Identified Potential Hazards

Potential Hazards	Likelihood of Hazard Occurring	Existing Controls	Pollution Response Measures
On-site spills or leaks of fuel, oil or hydraulic fluid	Unlikely – workshop located remote from sedimentation dam. Several storage structures exist to enable capture before release.	Diesel tanks and drum storages are fully bunded and dewatered as required. All bunded areas have been designed to contain at least 110 % of tank capacity. Workshop and Service areas currently drain to the sedimentation dam Solids from the Truck Wash are captured in a sediment pond	Containment of fluids within existing bunding, cleanup using pumpout or absorption material as necessary depending on volume of spill.
Fire, explosions and smoke on the site	Low	Existing fire management systems on site.	Implement notification procedures in the event of fire or explosions on site.
Personal injury resulting from a pollution event on site	Low	Existing OH&S plans in place.	Implement notification procedures if personal injury is the result of environmental factors which could affect neighbouring properties or individuals.

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Potential Hazards	Likelihood of Hazard Occurring	Existing Controls	Pollution Response Measures
Property damage caused by erosion or slumping of the coal reject emplacement, internal tailings dams or external drainage system.	Low	Ongoing monitoring of slope stability and open cut mining of tailings. Rehabilitation Plan approved which includes design of emplacement and drainage systems. Design of the final dam discharge sufficient to cater for Probable Maximum Flood Event	Implement notification procedures if property damage is likely to result from a pollution incident
Truck spills on internal roads within or near the site premises which may cause fuel, lubricants or other products to enter the site or threaten to enter water ways	Low	Truck management plans in place.	Implement notification procedures if material is likely to pollute offsite waterways or cause personal harm.

6 Inventory of Potential Pollutants

The following materials are stored on site:

- ☐ Bulk diesel stored in above ground licensed storage tanks;
- ☐ Flotation reagents;
- ☐ Flocculant and coagulant;
- ☐ Engine and gearbox oils;
- ☐ Hydraulic oils and fluids; and
- ☐ Lubricants, solvents and cleaners in small quantities.

The only Dangerous Goods stored on site in large quantities is diesel. The only hazardous goods stored on site in large quantities are flotation reagents, flocculent and coagulant. All other materials are stored in small quantities.

7 Inventory of Safety Equipment

Table 3 outlines the safety equipment kept on site.

Table 3 Inventory of Safety Equipment

Safety Equipment Item	Location	Maintenance Requirement
Fire extinguishers	Office, workshops, mobile equipment, hydro cabin	Inspections and maintenance as per manufacturer requirements.
Spill kits	Workshops	Monthly
Floating boom	Top store	Monthly
PPE	Office and workshops	Monthly
First aid kit	Top workshop, crib rooms, hydro cabin	Three Monthly
MSDSs	Workshop, office and oil store	All new substances at site to be accompanied by a MSDS.
Safety Signage	All of site	Monthly

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8 Minimising Harm to Persons on the Premises

All staff and contractors are to be appropriately inducted before completing any work on site. The induction covers procedures for minimizing the chance of a pollution incident occurring, managing a pollution incident and actions following a pollution incident.

Minimizing the impact to persons at Wollondilly Site during a pollution incident must be the highest priority. In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site evacuation procedure. All staff are informed of the location of muster locations through site inductions, signage and ongoing training. As part of the preparation of the PRIMP, the key aspects of the plan will be provided to staff and contractors. The PIRMP will be tested every 12 Months as detailed in Section 14. Emergency procedures shall be carried out as detailed in Sada SMP 003 "Emergency Management Systems". The plan has detailed procedures for environmental incidents, including duty cards for key personnel. The procedures and duty cards are kept in the washery control room.

9 Actions to be Taken Before, During or Immediately After a Pollution Incident

9.1 Actions to Minimise a Pollution Incident

Some general controls which are in place to reduce the likelihood of a pollution incident occurring include:

- ☐ Site Environmental and Safety Management Plans;
- ☐ Regular inspections and maintenance;
- ☐ Environmental monitoring;
- ☐ Correct storage of chemicals and hazardous substances;
- ☐ Waste management
- ☐ Training and awareness; and
- ☐ Testing of the PIRMP as detailed in Section 14.

The site will make all attempts to prevent pollution incidents, but in the situation where a pollution incident is imminent and may potentially cause detrimental impacts to human health or the environment, the site will contact the necessary stakeholders (employees, contractors, neighbours, appropriate regulatory authorities) to provide as much early warning as possible.

9.2 Actions During a Pollution Incident

During the site induction, staff and contractors are informed of muster locations. If an evacuation is required, this shall be completed in accordance with Section 8. In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site Evacuation Procedure. All staff are informed of the location of muster locations through site inductions, signage and ongoing training.

Licensees are required to report pollution incidents '*immediately*' (without delay) to appropriate regulatory authorities as listed in Section 10.2.

In the event of a pollution incident, the person who has identified the incident should immediately contact the Wollondilly Site Manager. The person reporting the pollution incident should provide the following key details:

- ☐ Location of the pollution incident/ emergency;
- ☐ Nature of the pollution incident/ emergency;

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- ☐ His or her name and contact details; and
- ☐ Details of any assistance required.

The details of any emergency call or incident reporting will be recorded.

Some general controls for managing a pollution incident include:

- ☐ Visually assessing the situation. Undertake emergency response if required;
- ☐ Contacting the appropriate regulatory authorities in accordance with the PIRMP (details in Table 5);
- ☐ If safe and possible to do so, undertake immediate measures that prevent further impacts from the pollution incident;
- ☐ Take direction from the appropriate regulatory authorities as required; and
- ☐ If required seek assistance from specialist consultants/contractors.

9.3 Pollution Incident Emergency Response

In the event of a pollution incident the risk of harm to human health and the environment will be minimised by engaging an appropriate pollution response as outlined below:

1. **Isolate the area:** In the event of oil, fuel or hydraulic fluid spill or leak, the area should be isolated and barricaded if required to reduce the risk of exposure to people. This must occur without exposure to danger.
2. **Stop the source:** If safe to do so, stop the process causing the spill/leak or other environmental incident.
3. **Commence early notification:** The Site Manager must be notified immediately of the pollution incident. Should the pollution incident threaten human or environmental harm they in turn must immediately precede with the notification of Authorities as detailed in this plan. If the pollution incident threatens the community off site, the nominated person must implement early notification procedures to the relevant Authorities including emergency services and alert potentially affected neighbours, with regular updates provided as needed.
4. **Provide a 1st aid response (if required):** First aid kits including instruction on use are available at the lunch rooms, top workshop and hydro area. Appropriate PPE is to be worn by all staff during periods of potential exposure as outlined in relevant MSDS.
5. **Identify the release to the greatest extent possible:** Do so without being at risk.
This includes identifying:
 - a. the type of material released, e.g.
 - i. Class 2 Gases - compressed, liquefied or dissolved under pressure.
 - ii. Class 3 Flammable Liquids
 - iii. Solid material spill
 - b. The label and MSDS for the product should give information on safe cleanup.
 - c. The size of the release and whether the release has stopped;
 - d. Whether chemicals involved may be potentially incompatible; and
 - e. Any unusual features such as foaming, odor, smoke, etc.
6. **Determine the level of emergency:** review chemical risk assessments, seek internal advice from area specialists, review MSDSs and seek professional advice from the fire brigade and/or hazardous material specialists.

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7. **Determine if evacuation is required** and consider the impact that wind, rain, local geographical features such as hills and storm water drainage systems may have in exposing persons at emergency assembly points. The Site Manager is to determine if evacuation of the site is to occur.
8. **Stop further release (if not done prior):** prevent further release by isolating the source of the release. (Trained personnel only with suitable PPE)
9. **Stop the release from spreading (if safe to do so):** deploy spill kits or floating boom to prevent further contamination dispersal:
 - a. **Liquid spills.** Use appropriate absorbent/containment materials such as socks (land) and booms (water), plug drains to prevent contamination of storm water. Spill kits are provided in the Workshop and Storage Shed.
 - b. **Ensure** that pollution control ponds remain as nil discharge.
 - c. **Powdered solid spills:** cover drains to prevent contamination of stormwater
 - d. **Large spills:** Summon specialist spill emergency response contractors (e.g. Transpacific Industrial Solutions, 1800 SPILLS). Although the quantities of materials stored on site are minor, this procedure is relevant if there is an incident involving a delivery truck.
 - e. Dispose of contaminated spill materials and wastes using a licensed contractor
 - f. If required, remediate the site.
10. **Fire:** Call 000 and report fire.
 - a. Evacuate personnel and assemble in the designated assembly areas
 - b. Once all personnel are accounted, evacuate the site if safe to do so

9.4 Procedure for Calling Emergency Services

Dial **000**

Ask for Ambulance/ Fire Brigade/Police. Be prepared to state:

Wollondilly Site
Burraborang Road, Nattai

Approximately 300 m before the township of Nattai

Nature of Emergency:

Fire
Serious Injury — number of injured and nature of injury
Entrapment — number of personnel

Site Telephone Number:

Office 02 46596810
Washery Control Room 02 4659 6856

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Give your name

Directions to site:

From the Burragorang Road, travel through the township of Oakdale towards the township of Nattai, signposted as Burragorang Lookout. Approximately 300 m before reaching Nattai town ship the site entrance is located on the right signposted as Wollondilly Coal Preparation Plant. The site operates on UHF 13.

Ask for estimated time of arrival at Site and log same. Advise emergency vehicles of any specific meeting point to be escorted through the site if necessary.

9.5 Evacuation Procedures

In the event of a decision being made to evacuate the site, the evacuation shall be carried as per SMP 003 "Emergency Management Systems". All instructions relating to this plan are kept in the washery Control Room and the duty operator is the Incident Coordinator of the exercise.

9.6 Action Following a Pollution Incident

In the event of a pollution incident, there will be a detailed incident investigation, an Incident Report will be completed and will be sent to the relevant regulatory authorities.

Within one month following a pollution incident, the PIRMP will be reviewed and tested. The Wollondilly Site will continue to liaise with the relevant appropriate regulatory authorities to reduce the likelihood of the pollution incident re-occurring.

All staff and contractors will receive the necessary refresher training, and the key outcomes of the incident investigation will be reported to staff and contractors.

The Wollondilly Site will consult with the appropriate regulatory authorities when determining whether the community will be notified of the pollution incident. If the community is to be notified, the Wollondilly Site will decide the most appropriate consultation strategy in consultation with the appropriate regulatory authorities.

10 Contact Details

10.1 Key Contacts/Positions

The Wollondilly Site personnel outlined in Table 4 are responsible for reporting environmental incidents that occur at the Wollondilly Site.

Table 4 Wollondilly Site Key Contacts

Key Contact		Position/Responsibility	Contact Details
Site office			46 596 810
Washery Control Room		Duty Operator	46 596 856
Peter Dunbier		Site Manager	0402 098 835
Peter Kisonka		Site Assistant Manager	0411 962 560
Robert Davis		Site Supervisor	46596327 or 0427 596 718
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10.2 Appropriate Regulatory Authorities

This section has been prepared to meet the requirements of clause 98 C (1) (h) of the POEO(G) Regulation. Table 5 outlines the contact details for the appropriate regulatory authorities for reporting pollution incidents from Wollondilly Site.

Table 5 Government Authority Contact List

Government Authority - Compulsory Notifications	Emergency notification phone number
NSW Office of Environment and Heritage – Environment Protection Authority	131 555
NSW Police and Ambulance	000
NSW Ministry of Health Public Health Unit (Sydney South West) – Camperdown Office	BH: 9515 9420 AH: 9515 6111 Ask for Public Health Officer on call
WorkCover	131050 Company ABN asked: 48 002 984 447
Sydney Catchment Authority	1800 061069
Wollondilly Shire Council	4677 1100
NSW Fire and Rescue	1300 729 579
Government Authority – If Relevant	Emergency notification phone number
National Parks & Wildlife - Duty Officer	0419 428 054
Roads and Maritime Services (road spills)	132 701
NSW Office of Water	8838 7885
Bush Fire Control Officer	1800 049933
Poisons Information Centre	131 126
Campbelltown hospital	(02) 4634 3000
Camden Hospital	(02) 4634 3000
Narellan police	(02) 4632 4499
Endeavour Energy (power line emergencies)	131 003

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11 Communication with Neighbours and the Local Community

Wollondilly Site is located approximately 1.5 km east of Nattai, NSW. There are no private residents located within 2 km of the property which are down slope or downstream of the property.

Other key features near Wollondilly Site include:

- ☐ Surrounding National Park lands
- ☐ Being upstream of Warragamba dam and within the inner catchment protection zone

In the event of a pollution incident, the Wollondilly Site has the following processes for contacting the community:

- ☐ When an incident occurs, the Wollondilly Site will immediately contact the appropriate regulatory authorities listed in Table 5;
- ☐ The Site will consult with these appropriate regulatory authorities to determine if the community is to be notified of the pollution incident. The Site will discuss with the appropriate regulatory authorities regarding the most relevant communication strategy (such as website, media release, direct contact with those potentially impacted);
- ☐ When determining the appropriate response and notification process for a particular pollution incident, all aspects of the pollution event will be taken into consideration (such as type and extent of pollution); and
- ☐ The results of the investigation of any pollution incident from the Wollondilly Site will be put on the website.

The process for notification of stakeholders relates directly to the nature of the hazard. In the event that there is an unacceptable risk to the community from the pollution incident the identified community will be notified. In the case of site-related incidents with the potential to cause material harm, the communications strategy will be coordinated with the Site Manager. Other notification procedures which may occur at the discretion of the site manager include:

- ☐ - Face to face/telephone contact with neighbouring properties
- ☐ - Letterbox drops
- ☐ - Update to project website

12 Staff Training

This section has been prepared to meet the requirements of clause 98 C (1) (m) of the POEO(G) Regulation.

The requirements of the PIRMP will be outlined in the site induction for all new employees and contractors. A toolbox talk outlining the key components of the PIRMP will be presented to all staff and contractors. The objective of training will be to ensure all staff and contractors are aware of the key steps to manage a pollution incident. If a pollution incident occurs, refresher training will be delivered to staff and contractors.

13 Availability of PIRMP

A copy of the PIRMP (electronic and hard copy) is to be kept by the Site Manager. Wollondilly Site will provide the NSW OEH (EPA) a copy upon request. The PIRMP will also be available on the company's website.

14 Testing of PIRMP

The PIRMP will be tested every 12 months as per the requirements of the POEO(G) Regulation. The testing of the PIRMP 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 that each plan is capable of being implemented in a workable and effective manner.

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Testing will involve undertaking desktop simulations of incidents and if necessary completing exercises or drills. Testing will need to cover all the components of the PIRMP, including the effectiveness of training.

Plans must also be tested within one month of any pollution incident occurring in the course of an activity to which a licence relates 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.

The dates on which the plan is tested and the name of the person undertaking the test will be recorded.

15 Refereneecs

Environment Protection Authority 2012, Guideline for the Preparation of Pollution Incident Response Management Plans

Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012.

Sada SMP 003 Emergency Management System

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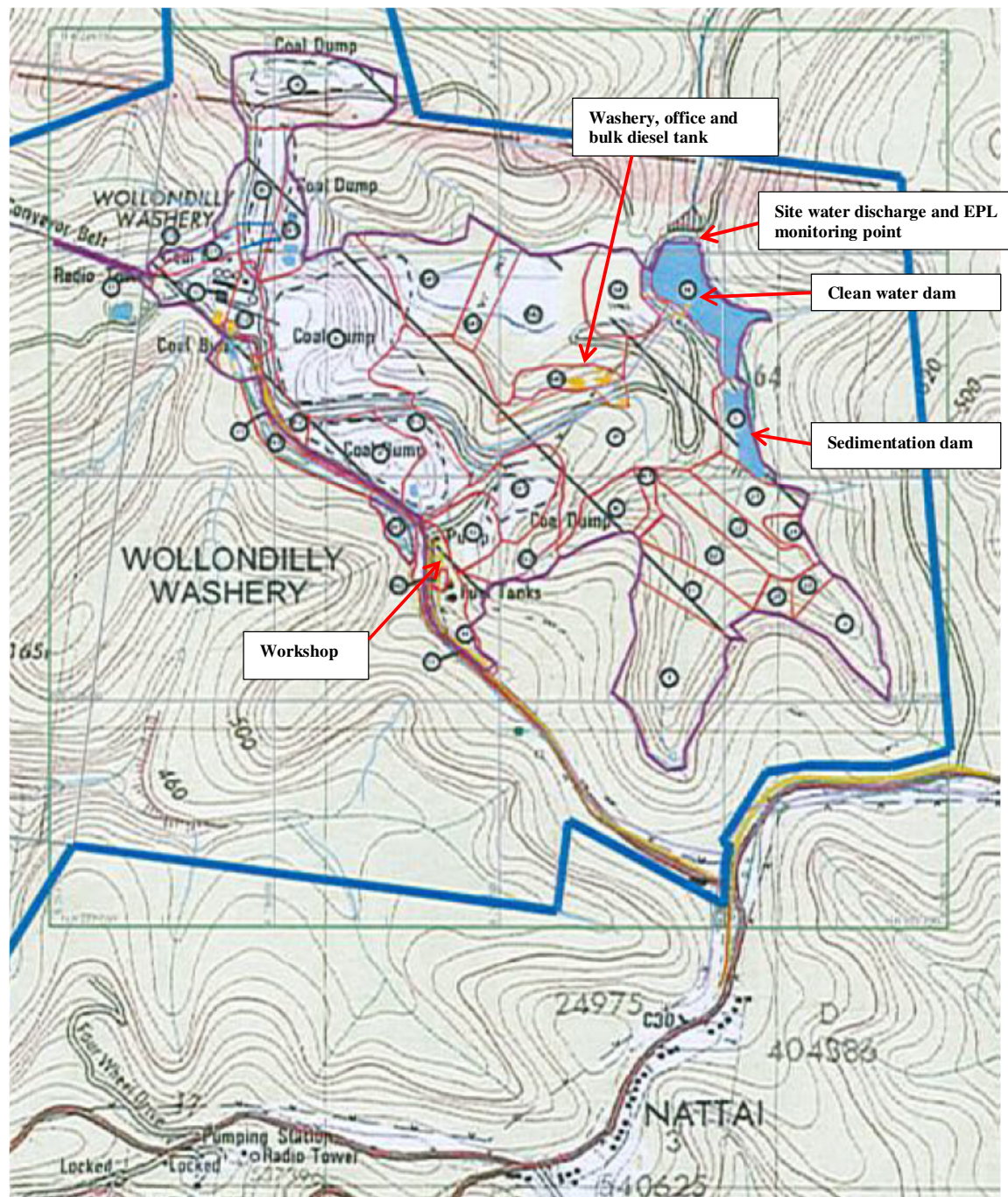
Attachments

Pollution Incident Immediate Notification Log

Person undertaking notification (Name/Function):		
Date and time when first become aware of the incident:		
Incident type:		
Comments:		

Initial immediate notification log				
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
NSW Fire Brigade				
Police/Ambulance 000				
National Parks				
Wollondilly Council				
Sydney Catchment Authority				
WorkCover				
Other				
Other				
Other:				
Other:				
Summary of initial communication:				

Immediate notification of further pertinent information (if applicable)				
Appropriate Regulatory Authority	Time of call	Respondent's name/function	Approximate call duration	Comments
EPA				
Public Health Unit				
Emergency 000				
Local Council				
Sydney Catchment Authority				
Other:				
Other:				
Summary of additional communication				

Detailed Site Plan

Original Date:	20/11/13	File Path/Name:	Pollution Management Plan	
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