



**Pollution Incident Response Management Plan
(PIRMP)**

January 2017

Document revision control and authorisation

Date	Revision	Modification	Prepared	Reviewed	Approved
10/10/2016	01	Original issue	Shaun Daniels	Frank Horky	James Perry
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	05				



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1. Background

This Pollution Incident Response Management Plan (PIRMP) has been developed by Vac Group. The plan applies specifically to the company depot; 1341 Elizabeth Drive, Kemps Creek, NSW where material product (re-purposed soil), flocculent, AdBlue and motor oil is stored.

This plan has been developed in response to amendments to the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) that requires holders of environment protection licences to comply with the new requirements. The POELA Act introduces several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act includes a new requirement under Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) to prepare, keep, test and implement a pollution incident response management plan.

2. Objectives

The objectives of this plan are as follows:

- To ensure continuing compliance with legislative obligations;
- To provide clear documentation of pollution risks, communication of relevant controls and procedures to authorities and community representatives;
- To provide required actions and notifications in the event of a pollution incident; and
- To detail related testing and training requirements.

3. Information included in this PRIMP

a) Description and likelihood of hazards

Vac Group is a vacuum excavation and service location company.

The company does not store licensable quantities of dangerous goods at this location.

The key activities undertaken at this location include:

- Parking of trucks and other vehicles;
- Routine maintenance of vehicles; and
- Dewatering of uncontaminated earthen material.

Substances kept onsite are limited to:

- engine oil used for vehicle servicing;
- AdBlue (low environmental risk post-combustion treatment); and
- flocculent (environmentally safe polymer).

The most likely environmental incident would include a spill of any of the following entering the tributary creek located south of the main operational area of the Kemps Creek depot:

- AdBlue storage;
- Motor oil storage; and
- Flocculent storage.

The potential for a spill or leak of any of the above is restricted to a delivery related incident, malfunction of the AdBlue pump resulting in uncontrolled release or malicious damage.

b) Preventive actions to be taken

Vac Group has taken a proactive approach to eliminate so far as is reasonably practicable or otherwise minimise the risk of pollution incidents which includes:

- Limiting quantities of substances stored at this location;
- Ensuring substances are positioned a safe distance from potential risk areas;
- Providing appropriate bunding and other containment measures;
- Undertaking monthly inspections of all Fire Safety Equipment;
- Provision of spill kits at bowser that are routinely audited for compliance;
- Procedures for prompt reporting of faults relating to environmental control measures
- Training of staff to ensure adequate understanding of the contents of this PIRMP and other supporting documentation including:
 - Vac Group HSE Management Plan; and
 - Vac Group HSEQ Instruction No. 25 – Environmental protection and spill management.
- CCTV monitoring 24 hours/day and security access to minimise malicious damage.

c) Inventory of potential pollutants

Typical quantities kept on the premises are as follows:

- Flocculent (see SDS and map) – 1, 000L
- Motor oil storage (see SDS and map) – 1, 000L
- AdBlue (see SDS and map) – 1,000L

d) Notification protocol

In accordance with the POEA Act, the incident reporting procedure will form part of the duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment. The worker undertaking an activity that causes an incident is required to immediately notify their supervisor and follow directions contained within this PRIMP plan. This reporting requirement is consistent with HSEQ Instruction 25 - Environmental protection and Spill management.

If a pollution incident occurs which causes or threatens material harm to the environment, the incident must be immediately reported to each relevant authority as listed in Section 3 (f).

If a pollution incident occurs and it presents an immediate threat to human health and property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance as required.

If the incident does not pose an immediate threat to human health and property and does not require an initial emergency contact, an obligation still exists to report the incident to relevant authorities as appropriate.

e) Safety equipment

Personal Protective Equipment (PPE) is available on site to all staff working in or around areas where pollutant risks have been identified.

This includes but is not limited to:

- Protective glasses/goggles
- Hearing protection
- Protective masks
- High visibility clothes
- Gum boots
- Protective gloves
- Fire extinguishers
- First aid stations and personal first aid kits
- Other safety related onsite equipment/information includes:
- SDS (see appendix 1)
- Spill kits
- Appropriate access and chemical identification signage

f) Emergency and community contact details

The following lists the required emergency and community contacts in the event a Pollution incident.

Regulatory Authority	Contact Number
EPA NSW	131 555
SafeWork NSW	131 050
Fire and Rescue	000
Blacktown City Council	(02) 9839 6000

g) Minimising harm to persons on the premises

Given the low level risks associated with substances and quantities kept at the Kemps Creek site, emergency response relating to potential pollution incidents will typically involve localised spill containment and recovery, with minimal impact to human health or safety.

If required, standard emergency response procedure will be implemented and includes:

- Alarm raised by Emergency Warden
- Calmly evacuate the premises via the nearest emergency exit;
- Follow Emergency Warden’s instructions;
- Arrive at evacuation assembly point; and
- Relevant emergency services authorities contacted by Emergency Warden.

h) Actions to be taken immediately after incident

Actions to be taken following a pollution incident will be influenced by the type and size of incident. Vac-U-Digga units are very effective in vacuuming mud, slurries and other liquids, in addition to the hydro excavation services they typically provide. They also have a unique capability to be effectively deployed in response to large spills or similar incidents which have potential to cause a risk to health and safety and/ or harm to the environment.

Onsite spill recovery capability

Vac-U-Digga units are capable of holding liquid material indefinitely until treatment, handling or other material management options are decided.

Chemical Spill

A small spill is to be cleaned using the designated Spill Kit and ensuring appropriate PPE is worn.

For larger spills Vac-U-Digga units may be deployed to:

- Recover pollutant/s;
- Clean the area; and
- Dispose of pollutant in accordance with relevant environmental requirements.

Fire

Where small fires can be contained, on-site dry chemical powder fire extinguishers will be used. Large fires will be immediately reported to emergency services as per the PIRMP and the Emergency Evacuation Procedure will be implemented. The risk of fire on this site is negligible due to the risk level of the materials being stored being low.

I) Maps

Attached in Appendix .1 is a site map of 1341 Elizabeth Drive, Kemps Creek, NSW, 2178. This is the primary premises of Vac Group in NSW. The map indicates the location of the flocculent, motor oil, cleaning products and AdBlue on site and the Emergency Evacuation location.

4. Availability of PRIMP and any associated plans/documentation

This PIRMP has been documented to comply with legislative requirements under the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2009.

This plan has been made publicly available as required within 14 days following the preparation. It can be viewed on the company website at www.vacgroup.com.au. Additionally, a hard copy will be located onsite at all times.

Additionally, the PIRMP will be implemented in conjunction with Vac Group’s HSE Management system including HSEQ Instruction 25 - Environmental protection and spill management.

5. Training of staff

Training of staff in the understanding and implementation of this PRIMP will be provided by Operational staff with support from the HSEQ and Training Supervisor.

Training includes but is not limited to:

- Ensuring detailed familiarity with this plan, the HSE Management Plan and HSEQ Instruction No. 25 Environmental protection and spill management;
- Ensure learnings from the test evacuation and other emergency management exercises are communicated;
- Ensure knowledge of legislative and statutory requirements;
- Included as part of company inductions of all NSW personnel;
- Use of Toolbox meetings to identify basic training and possible WHS issues

Training records will be maintained and kept with a hard copy of this PRIMP (see appendix. 2). Training will occur on commencement of employment and then annually unless there is a modification to this PRIMP within the annual period. Then training will occur relative to the modification.

6. Testing of PRIMP

Following the preparation of this PRIMP, it will be tested using a mock pollution incident to ensure all personnel are aware of required response actions and responsibilities for pollution incidents.

The Emergency Warden is responsible for documenting any issues that emerge during the mock pollution incident and making recommendations regarding any changes that subsequently need to be made to PRIMP. The testing of this PRIMP will require the attendance sheet (appendix 4) to be completed and the document revision to be updated if applicable. All documentation relative to the mock pollution incident including any amendments to this PRIMP is to be retained with this PRIMP and made available to the EPA any time a request is made.

7. Implementation and review of primp

An annual review of this PRIMP is required. In the event a change occurs that requires this PRIMP to be reviewed within the annual period, this then becomes the revised annual review date.

Appendix 1 – Site map, Kemps Creek Depot



