

NSW Pollution Incident Response Management Manual



Contents

Purpose and Scope	3
Governance, Roles and Responsibilities	4
Table 1 Reporting Responsibilities	4
Notification Protocol	6
When notification is required	6
Who is to be notified	6
Figure 1 Pollution Incident Notification Protocol	7
What is to be notified	8
Pollution Incident Response Process	9
Compliance Provisions	9
Table 2 PIRMP Requirements	9
Table 3 PIRMP Structure	10
Figure 2 Typical Veolia Incident Response Process	13
Publishing of Monitoring Results	14
Figure 3 Overview of EPA Publishing Requirements	15
Other Regulatory Considerations	16
Terms and Definitions	17
Related Documents	18
Referenced Documents	18
Appendix A1	19
Public Health Unit Listing	19
Appendix A2	24
Local Authorities	24

Purpose and Scope

Why is this important?

The NSW Pollution Incident Response Management Manual (the PIRM Manual) has been prepared by Veolia Australia and New Zealand (Veolia) to disseminate how Veolia deploys pollution incidents response and communicates with workers and other stakeholders (including relevant authorities and the public) who may be affected by the impacts of a pollution incident. This document also provides guidance on the information required to be published by Veolia

The PIRM Manual provides an overarching framework for NSW sites to augment their site specific incident/emergency documentation. Furthermore, the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act), requires holders of an Environment Protection Licence (EPLs) to prepare and implement a Pollution Incident Response Management Plan (PIRMP).

Under 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 General Regulation), the specific requirements for preparing, keeping, testing and implementing a PIRMP, for Veolia NSW facilities with EPLs, are covered by site specific incident and emergency response documentation, which incorporate the PIRMP. These provide guidance for minimising and controlling the risk of a pollution incident, through the appropriate identification of hazards and development of controls to mitigate these and assign responsibility for its suitable implementation.

Who does it apply to?

The requirements of this Manual applies to all Veolia entities across NSW throughout the Water, Waste and Energy lines of business.

Governance, Roles and Responsibilities

Veolia has set out the roles and responsibilities to ensure the approach to this document and its implementation are fulfilled. The following specific roles and responsibilities for communicating pollution incident have been identified (refer Table 2).

Table 1 Reporting Responsibilities

Role	Responsibility
Veolia	Veolia ANZ Corporate outlines the policies and procedures which are to be adhered to, in addition to legislative requirements, when reporting pollution incidents and/or implementing PIRM Manual requirements
Executive Team Member	An Executive Team Member has the responsibility of ensuring the identification and mitigation of risks specific to their business units are being undertaken and appropriately documented
MarComms Team	The MarComms Department is responsible for maintaining the Veolia website and uploading pollution incident notifications to the website on request
Management/Safety, Health, Environmental and Quality (SHEQ) Team	<p>Manager/SHEQ have the authority to authorise the dissemination of information to stakeholders, following approval of an Executive Team Member, via the means of telephone calls, electronic mails, SHEQ alerts, upload of communications messages to the Veolia company website or other suitable mechanism</p> <p>Where notified of a pollution incident, it is the duty of Management/SHEQ to notify each relevant authority of the incident and all relevant information about it.</p>
Line Manager/Supervisor	It is the responsibility of the Line Manager/Supervisor to determine the requirement and extent of community notification for potential pollution incidents. Where incident notifications are to be placed on the website, approval must be sought from Management.
Worker	It is the responsibility of all workers (including subcontractors), immediately after the person becomes aware of the pollution

	incident, to notify their Line Manager/Supervisor of the incident and all relevant information about it.
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Notification Protocol

When notification is required

Pollution incidents are required to be reported '*immediately*' to relevant authorities, meaning promptly and without delay. The requirement to report pollution incidents immediately to relevant authorities enables the management of incidents in a faster time, as well as providing early warnings (and any necessary updates) to potential affected parties.

A '*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. A pollution incident is required to be notified if there is a risk of material harm to the environment.

Under section 147 of the POEO Act, '*material harm to the environment*' is defined 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 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.

Who is to be notified

The relevant authorities under section 148 of the POEO Act means any of the following:

- (a) the appropriate regulatory authority (for the activity under the POEO Act, usually EPA or local authority such as the council),
- (b) the Environment Protection Authority (EPA) (if not the appropriate regulatory authority),
- (c) the local authority for the area in which the pollution incident occurs (if the EPA is the appropriate regulatory authority in [a]),
- (d) the Ministry of Health (or the local public health unit, refer **Appendix A**),
- (e) the WorkCover Authority (now SafeWork NSW),
- (f) Fire and Rescue NSW

Figure 1 describes the protocol for industry notification of pollution incidents, with the contact details of the relevant authorities. Other relevant authorities may include, but are not limited to,

the NSW Department of Planning and Environment, Roads and Maritime Services, Water NSW etc, as well as clients, neighbours and/or land owners of the premises on which Veolia operates.

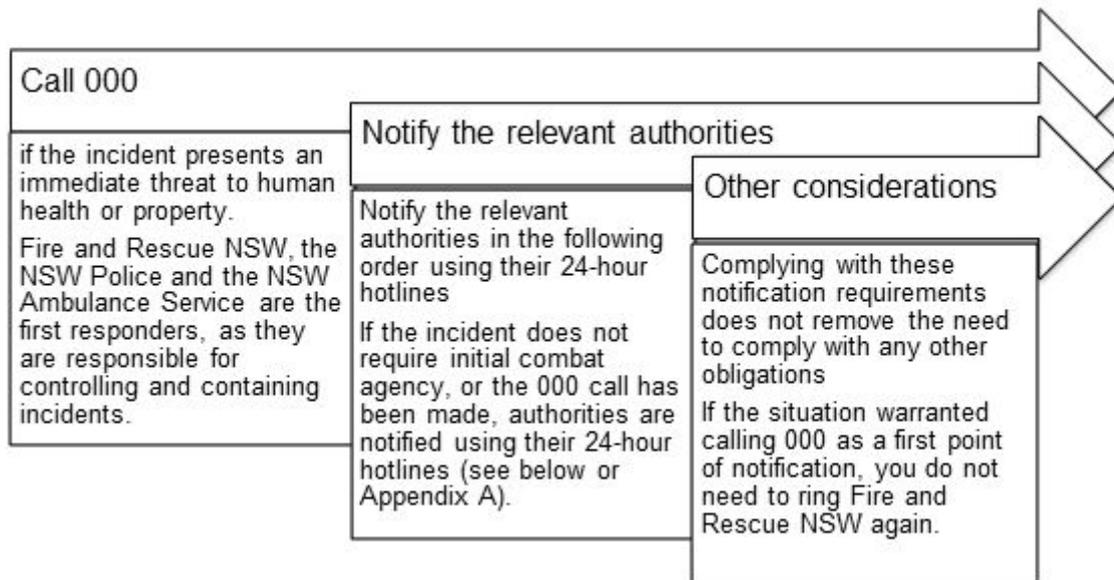


Figure 1 Pollution Incident Notification Protocol

EPA – phone Environment Line on 131 555
 Ministry of Health*
 SafeWork NSW – phone 13 10 50
 The local authority*
 Fire and Rescue NSW – phone 1300 729 579

**The appropriate contacts for the the Ministry of Health via the relevant Public Health Unit and relevant local authorities for Veolia NSW sites are provided in Appendix A, as well as the Incident and Emergency Response documentation prepared for each premises.*

Communication mechanisms will be used where neighbours and/or the local community may be affected by the incident, including but not limited to:

- website
- telephone notification and/or emails
- signage
- letterbox drops
- door knocking

What is to be notified

Notification of pollution incidents to authorities require verbal notification, and where requested to do so, followed by written notification under section 148 and 150 of the POEO Act. The relevant information to be provided should consist of the following:

- (a) the time, date, nature, duration and location of the incident,
- (b) the location of the place where pollution is occurring or is likely to occur,
- (c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- (d) the circumstances in which the incident occurred (including the cause of the incident, if known),
- (e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
- (f) other information prescribed by the regulations

Pollution Incident Response Process

Compliance Provisions

The specific requirements of a PIRMP are set out in legislative instruments (refer Section: Reference and Related Documents) with provisions as detailed in Table 2.

Table 2 PIRMP Requirements

Provision	Requirement	How Veolia Complies
POEO Act (section 153A)	All holders of environment protection licences must prepare a pollution incident response management plan	All Veolia NSW sites that have an EPL, have a PIRMP incorporated in their Incident and Emergency Response documentation.
POEO Act (section 153C) POEO General Regulation (clause 98B)	The plan must include the information detailed in the ACT and be in the form required by the Regulation	As per the information provided in Table 3, each licensed site's incident and emergency documentation stipulates how this requirement is met.
POEO Act (section 153D)	Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place	Noted, the relevant incident and emergency response documentation per site or activity are kept at the Premises or with the Veolia personnel performing the pertaining work.
POEO General Regulation (clause 98E)	Licensees must test the plan in accordance with the Regulation	Annual emergency drills are undertaken at Veolia sites where the incident and emergency documentation, which incorporate the PIRMP, are tested for currency and adequacy.
POEO Act (section 153F)	If a pollution incident occurs in the course of an activity so that material harm to the environment	This PIRMP manual and supporting site specific Incident and Emergency documentation

	is caused or threatened, licensees must immediately implement the plan	provide Veolia personnel with the relevant guidance with which to implement the PIRMP.
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Each site or activity specific Incident and Emergency Response documentation provides the framework for how the requirements of a PIRMP have been addressed, as per the structure presented in Table 3. A typical process for how Veolia NSW implements the PIRMP is shown in Figure 2.

Table 3 PIRMP Structure

Provision	Pollution Incident Response Management Plan Reference
Description and likelihood of hazards [clause 98C (1)(a) and (b)]	Each Veolia NSW facility has a site specific risk register and Operational/Site Management Plan, which combined contain: <ul style="list-style-type: none"> • Identified significant environmental aspects and impacts • Potential hazard and impacts • Inherent (before taking existing controls into account) risk level for each impact • Hierarchy of controls to be implemented • Residual (after taking existing controls into account) risk level for each impact Where high or extreme residual risks have been identified on site, these have been signed appropriate controls as detailed in the register and/or operational/site management plan or a facility specific Environmental Management Plan. Should any other such risk be identified they will be escalated to the attention of the site (and Veolia senior management) and dealt with in accordance with the Veolia ANZ Risk Management Standard.
Pre-emptive actions to be taken [clause 98C(1)(c)]	Pre-emptive actions are detailed in site specific risk registers and are referred to as Controls, with appropriate supporting procedures referenced in site specific Operational/Site Management Plans.
Inventory of pollutants [clause 98C(1)(d) and (e)]	A full list of the bulk chemicals, their storage quantities and locations are detailed in site specific Hazardous Substances and Dangerous Goods registers

<p>Safety equipment [clause 98C(1)(f)]</p>	<p>Veolia NSW sites are equipped with safety devices such as safety showers, chemical decontamination kits, breathing equipment, first aid stations, spill kits, etc.</p> <p>Where additional PPE is required (eg. chemical suits) the requirements are spelled out in the relevant task-specific work instructions.</p> <p>Safety Data Sheets are located as appropriate on sites in close proximity to the chemical they apply to.</p>
<p>Contact details [clause 98C(1)(g) and (h)]</p>	<p>The names, position titles and 24-hour contact details of key individuals who are responsible for activating the Incident and Emergency Response documentation and managing the responses are detailed within such plans/procedures.</p> <p>The contact details of relevant authorities such as the EPA, the local council, fire and emergency services, as well as other relevant regulatory authorities are also contained in the documentation, in addition to this Manual.</p>
<p>Communicating with neighbours and the local community [clause 98C(1)(i)]</p>	<p>The mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of premises who may be affected by a pollution incident occurring on site are detailed in this Manual.</p>
<p>Minimising harm to persons on the premises [clause 98C(1)(j)]</p>	<p>To minimise the risk of harm to any persons who may be on the premises should an incident occur a number of incident response procedures have been developed. The response procedures detailed in the site specific Incident and Emergency documentation, and include (but not limited to) potential emergencies and incidents such as:</p> <ul style="list-style-type: none"> ● Fire ● Hot Loads (Fire during transit) ● Explosions ● Chemical or Pollutant Spills ● Medical Emergencies ● Rescue Situations ● Bomb/Phone Threats

<p>Maps [clause 98C(1)(k)]</p>	<p>A set of maps and diagrams have been prepared for Veolia NSW sites and are appended to the specific Incident and Emergency Response documentation.</p> <p>The following typical details are included:</p> <ul style="list-style-type: none"> • The location of the premises and the surrounding area that is likely to be affected by a pollution incident; • The location of potential pollutants on the premises
<p>Actions to be taken during or immediately after a pollution incident [clause 98C(1)(l)]</p>	<p>The site specific Incident and Emergency Response documentation include detailed descriptions of the actions that will be taken immediately after a pollution incident to reduce or control any pollution.</p> <p>In addition, detailed chemical and hazardous material management procedures have been developed. The procedures include spill/emissions response and clean up/remediation instructions.</p> <p>Further information regarding the site's readiness for incidents and emergencies can be found in the site specific Incident and Emergency Response documentation , including the notification requirements, in addition to this Manual.</p>
<p>Staff training [clause 98C(1)(m)]</p>	<p>All relevant workers are trained in Incident and Emergency management.</p> <p>The training consists of two major components:</p> <ul style="list-style-type: none"> • Theoretical module – ERP training • Practical component – participation in both desktop and incident and emergency scenario simulation drills. <p>Training records are to be maintained on site training databases and/or in the staff personnel folders.</p>

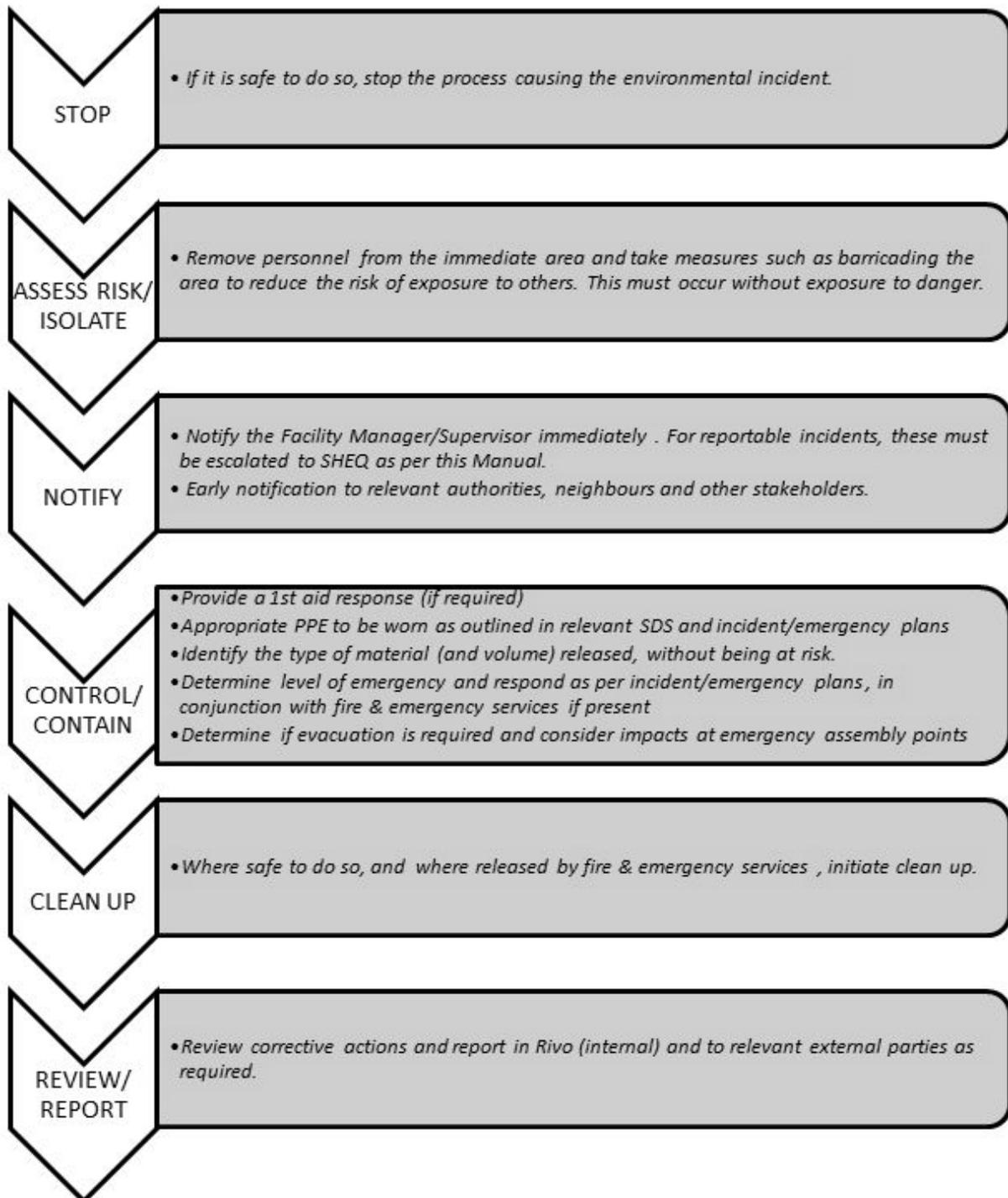


Figure 2 Typical Veolia Incident Response Process

Publishing of Monitoring Results

In accordance with section 66(6) of the POEO Act licensees are required to publish pollution monitoring data that has been collected as a result of a licence condition. This section stipulates the following:

- licensees who undertake monitoring as a result of a licence condition must publish or make available pollution monitoring data within 14 days of obtaining the data and/or receiving a specific request for a copy of the data
- licensees who maintain a website must make the monitoring data related to pollution available in a prominent position on their website
- licensees who do not maintain a website must provide a free of charge copy of the pollution monitoring data on reasonable written request from any person
- the data must be published in accordance with requirements issued in writing by the EPA and this document constitutes those requirements.

For the purposes of these requirements, the timeframe for publishing or providing data is 14 working days.

The following diagram provides an overview of this process as per the *Requirements for publishing pollution monitoring data* (EPA, 2013).

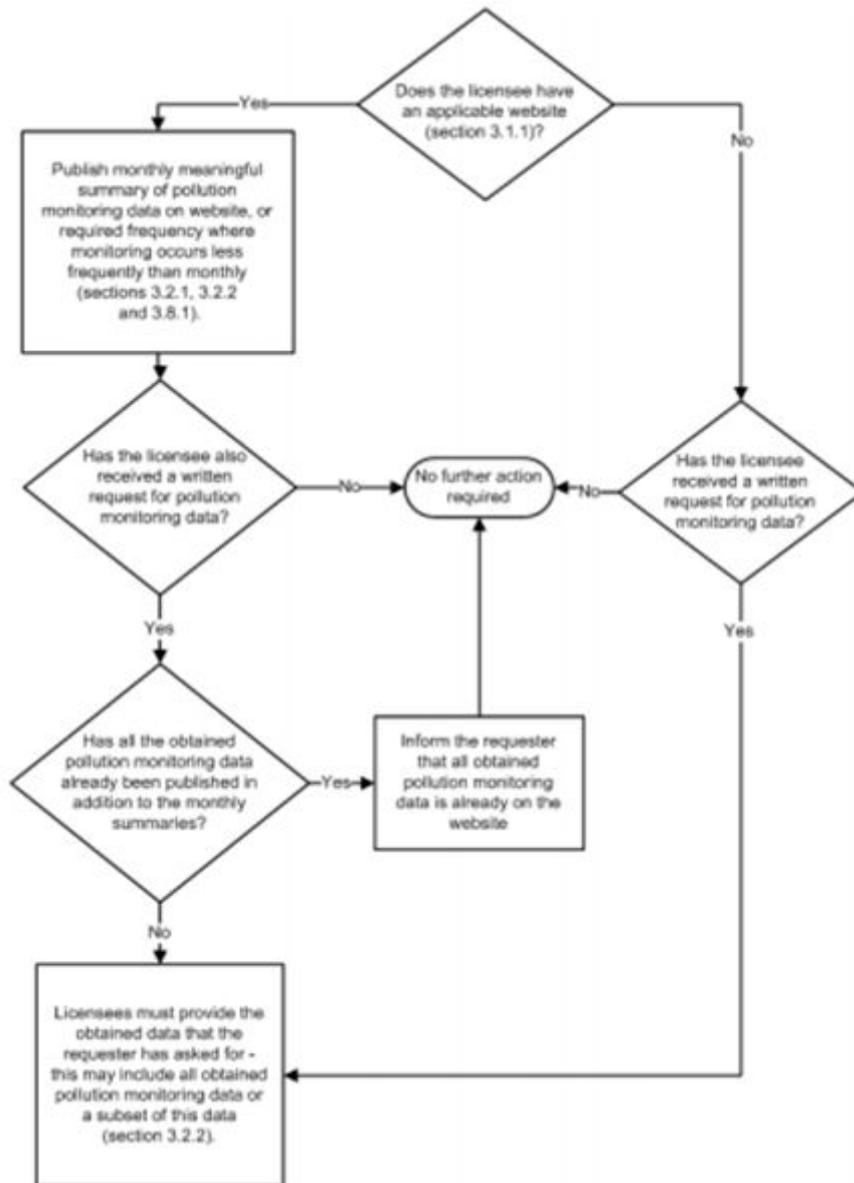


Figure 3 Overview of EPA Publishing Requirements

Other Regulatory Considerations

- The EPA has the power to place a condition on a licence requiring a mandatory environmental audit.
- The EPA and the Ministry of Health have explicit powers to require the occupier of a premises and any person they reasonably suspect of causing a pollution incident to pay for an analysis of the human health and environmental risks arising from the incident.
- The EPA has the power to direct the occupier of premises where a pollution incident that causes or threatens material harm to the environment has occurred to notify all others of the incident as the EPA thinks necessary.
- The information included on the public registers of Appropriate Regulatory Authorities (such as the EPA and local councils) have been expanded to include details of:
 - any mandatory audit required to be undertaken in relation to a licence (EPA only)
 - each pollution study required by a condition of a licence (EPA only)
 - each pollution reduction program required by a condition of a licence (EPA only)
 - each penalty notice issued (EPA and other Appropriate Regulatory Authorities)
- Dangerous goods transporters (including those goods designated as wastes) are required to prepare a transport emergency response plan (TERP). These plans may only require minor changes and a reference in the PIRMP to satisfy the above requirements.
- The PIRMP does not replace legislative requirements or relevant chemical control orders.
- Where plans or documentation required by other legislation satisfy the requirements of the PIRMP, then these may be referenced rather than duplicated.
- Under Section 3.4.2 of the Environmental Guidelines: Preparation of Pollution Incident Response Management Plans (communication with the community), where community notification is required following a pollution incident involving trackable waste, this will usually be led by the incident controller from emergency services (NSW Police Force or Fire & Rescue NSW).

Terms and Definitions

Generic Veolia terms and definitions are available in the BMS [Dictionary](#)

Reference and Related Documents

Related Documents

Document Code/Reference	Document Name
	Site specific incident and emergency plans

Referenced Documents

Document Name
Protection of the Environment Operations Act 1997 (NSW)
Protection of the Environment Operations (General) Regulation 2009
Protection of the Environment Legislation Amendment Act 2011 (NSW)
Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012 (NSW)
Environmental guidelines: Preparation of pollution incident response management plans (EPA, 2012)
Requirements for publishing pollution monitoring data (EPA, 2013)

Appendix A1

Public Health Unit Listing

(source: <http://www.health.nsw.gov.au/Infectious/Documents/phu-referral-list.pdf>)

Public Health Unit	Contact Details
<p>E.g. Veolia Camperdown Public Health Unit (Sydney LHD)</p>	<p>PO Box 374, Camperdown 2050 Phone: (02) 9515 9420 Fax: (02) 9515 9440 After hours Phone: (02) 9515 6111 (Royal Prince Alfred Hospital) - ask for Public Health Officer on call</p>
<p>Gosford Public Health Unit (Central Coast LHD)r</p>	<p>PO Box 361, Gosford, 2250 Phone: (02) 4320 9730 Fax: (02) 4320 9746 (secure line) After hours Phone: (02) 4320 2111 (Gosford Hospital) - ask for Public Health Nurse on call</p>
<p>Hornsby Public Health Unit (Northern Sydney LHD)</p>	<p>Hornsby Hospital, Palmerston Rd, Hornsby, 2077 Phone: (02) 9477 9400 Fax: (02) 9482 1650 / 94821358 (secure line) After hours Phone: (02) 9477 9123 (Hornsby Hospital) - ask for Public Health Officer on call</p>

<p>Liverpool Public Health Unit (South Western Sydney LHD)</p>	<p>P.O. Box 38, Liverpool BC NSW 1871 Phone: (02) 8778 0855 Fax: (02) 8778 0838 After hours Phone: (02) 9828 3000 (Liverpool Hospital) - ask for Public Health Officer on call</p>
<p>Matraville Public Health Unit (Justice Health)</p>	<p>PO Box 150, Matraville, 2036 Phone: (02) 9311 2707 Fax: (02) 9700 3747 (secure line) After hours Mobile: 0408 273 465</p>
<p>Newcastle Public Health Unit (Hunter New England LHD)</p>	<p>Locked Bag 10, Wallsend, 2287 Phone: (02) 4924 6477 Fax: (02) 4924 6048 (secure line) After hours Phone: (02) 4924 6477 (John Hunter Hospital) - ask for Public Health Officer on call</p>
<p>Parramatta Public Health Unit (Western Sydney LHD)</p>	<p>Locked Bag 7118, Parramatta BC 2150 Phone: (02) 9840 3603 Fax: (02) 9840 3608 / 9840 3591 (secure line) After hours Phone: (02) 9845 5555 (Westmead Hospital)</p>

	- ask for Public Health Officer on call
Penrith Public Health Unit (Nepean Blue Mountains LHD)	PO Box 63, Penrith 2751 Phone: (02) 4734 2022 Fax: (02) 4734 3300 / 4734 3444 (secure line) After hours Phone: (02) 4734 2000 (Westmead Hospital) - ask for Public Health Officer on call
Randwick Public Health Unit (South Eastern Sydney LHD)	Locked Bag 88, Randwick, 2031 Phone: (02) 9382 8333 Fax: (02) 9382 8334 / 9382 8314 (secure line) After hours Phone: (02) 9382 2222 (Prince of Wales Hospital) - ask for Public Health Nurse on call
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
Goulburn Public Health Unit	Locked Bag 11, Goulburn, 2580

<p>(Murrumbidgee and Southern NSW LHD)</p>	<p>Phone: (02) 4824 1837</p> <p>Fax: (02) 4824 1831 / 4822 5038 (secure line)</p> <p>After hours</p> <p>Phone: (02) 6080 8900</p> <p>(Albury Base Hospital)</p> <p>- ask for Public Health Officer on call</p>
<p>Lismore Public Health Unit (Mid North Coast and Northern NSW LHD)</p>	<p>PO Box 498, Lismore, 2480</p> <p>Phone: (02) 6620 7585</p> <p>Fax: (02) 6622 2151 / 6620 2552 (secure line)</p> <p>After hours</p> <p>Phone: 0439 882 752 Infectious Disease or</p> <p>Phone: 0428 882 805 Environmental Health</p>
<p>Port Macquarie Public Health Unit (Mid North Coast and Northern NSW LHD)</p>	<p>PO Box 126, Port Macquarie, 2444</p> <p>Phone: (02) 6588 2750</p> <p>Fax: (02) 6588 2837 (secure line)</p> <p>After hours</p> <p>Phone: 0439 882 752 Infectious Disease or</p> <p>Phone: 0428 882 805 Environmental Health</p>
<p>Tamworth Public Health Unit (Hunter New England LHD)</p>	<p>Locked Mail Bag 9783, NEMSC 2348</p> <p>Phone: (02) 6764 8000</p> <p>Fax: (02) 6766 3890 (secure line)</p> <p>After hours</p> <p>Phone: (02) 6764 8000 (Public Health Officer on call)</p>

Appendix A2

Local Authorities

Public Health Unit	Contact Details
Banksmeadow Transfer Terminal EPL - 20581	City of Botany Bay 1300 581 299
Cameron Park (Hunter) Depot EPL - 13212	City of Lake Macquarie Council 4921 0333
Clyde Transfer Terminal EPL - 11763	Cumberland Council 8757 9000
Camellia Recycling Centre EPL - 4806	City of Parramatta Council 1300 617 058
Crisps Creek IMF EPL - 11455	Goulburn-Mulwaree Council 4823 4444
Earthpower Technologies Sydney EPL - 11797	City of Parramatta Council 1300 617 058
Greenacre Resource Recovery Facility EPL - 3070	Bankstown City Council 9707 9000
Gerringong Sewage Treatment Plant EPL - 11317	Kiama Municipal Council 4232 0444
Horsley Park Landfill and Recycling Facility EPL - 11584 & 20339	Fairfield City Council 9725 0222
Port Botany Resource Recovery Facility	City of Botany Bay

EPL - 6179	1300 581 299
Kurnell (Sydney) Desalination Plant	Sutherland Shire Council 9710 0333
Woodlawn Bioreactor and MBT Facility EPL - 11436 EPL - 20476	Goulburn-Mulwaree Council 4823 4444
Waste Transport EPL - 12022	Subject to location of activity/incident