

The Protection of the Environment Operations Act 1997 (the Act) was amended to require the licensee of an Environment Protection Licence (EPL) to develop and implement Pollution Incident Response Management Plans (PIRMP) for sites with EPLs in accordance with Part 5.7A of the Act and Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (the General Regulation). Section 153C of the Act provides that a PIRMP must be prepared and that certain information must be included in the plan. Information to be considered in the plan includes:

- (a) the procedures to be followed by the holder of the EPL or the occupier in notifying a pollution incident to:
 - (i) the owners or occupiers of premises in the vicinity, and
 - (ii) the local authority for the area and any area affected, or potentially affected, by the pollution, and
 - (iii) any persons or authorities required to be notified by Part 5.7,
- (b) a detailed description of the action to be taken, immediately after a pollution incident, to reduce or control any pollution,
- (c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made,
- (d) any other matter required by the regulations.

The Act also requires parts of the plan to be made readily available and for the plan to be tested and implemented in the case of a pollution incident occurring. The General Regulation provides a more detailed outline of what is to be considered in the plan and availability and testing of the plan.

The following information has been prepared in accordance with clause 98D of the General Regulation which provides that:

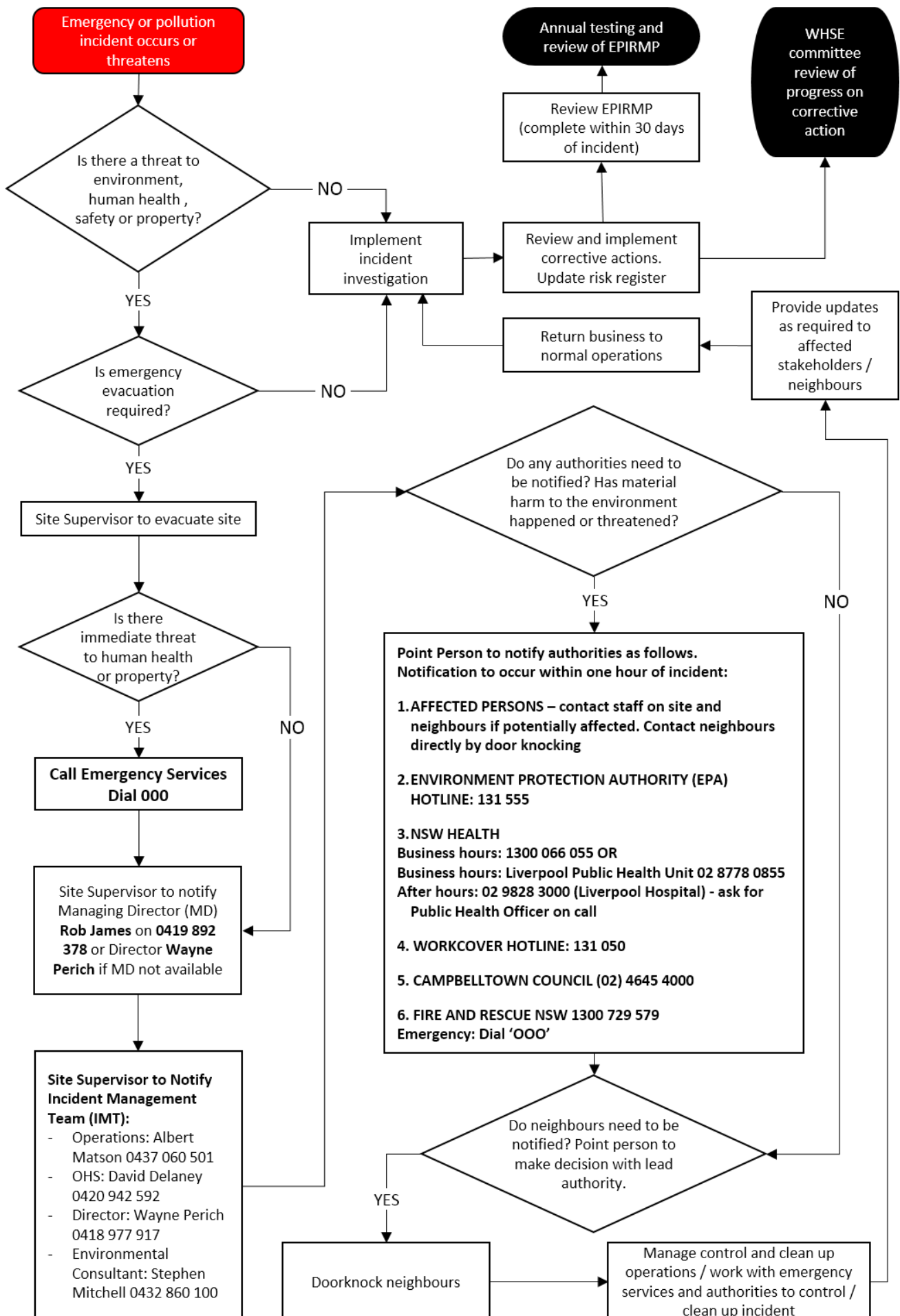
- (1) A plan is to be made readily available:
 - (a) to an authorised officer on request, and
 - (b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.
- (2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:
 - (a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan,
 - (b) if the person does not have such a website —by providing a copy of the plan, without charge, to any person who makes a written request for a copy.
- (3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:
 - (a) section 153C (a) of the Act, and
 - (b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).
- (4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).

The following pages outline the steps to be implemented in the event of a pollution incident.

The following table is to be read in conjunction with the Pollution Incident Response Management Plan flowchart on the last page of this document.

Step	Key Tasks	
<p>1</p>	<p>Identify and assess significance of incident</p> <p>Determine scale of Incident</p> <p>Evacuate site if necessary</p>	<p>Incident identified</p> <p>Assess potential for escalation</p> <p>Assess risks</p> <p>Assess impacts on:</p> <ul style="list-style-type: none"> • People • Environment • Community • Business stakeholders <p>Assess if site evacuation or site closure required.</p>
<p>2</p>	<p>Notify</p> <p>Notify affected stakeholders and authorities.</p>	<p>If an emergency contact EMERGENCY SERVICES on '000' first. Otherwise the following stakeholders are to be notified in the order outlined below.</p> <ol style="list-style-type: none"> 1. Affected persons or potentially affected persons in immediate area and neighbouring premises. Go door to door and ensure all affected / potentially affected parties are informed of incident and what to do. <p>NB: follow the directions and or advice of the lead agency in relation to notification of the public.</p> <ol style="list-style-type: none"> 2. EPA via Environment Line – phone: 131 555 3. NSW Health via <ol style="list-style-type: none"> a. Public Health Unit – phone: 1300 066 055 (business hours); or b. Liverpool Public Health Unit – phone: 8778 0855 (business hours) ask for public health officer; or c. After hours: 9828 3000 (Liverpool Hospital) - ask for Public Health Officer on call 4. WorkCover – phone: 131 050 5. Campbelltown Council – phone: (02) 4645 4000 (all hours) 6. Fire and Rescue NSW – phone: 1300 729 579 <ol style="list-style-type: none"> a. Emergency: dial 000
<p>3</p>	<p>Establish management Protocol</p> <p>Steps to identify incident controller, lead agency, assessment of risk and who to take control through management of the incident through to resolution.</p>	<p>Contact Point Person. The Point Person is the General Manager, Rob James - phone: 0419 992 378</p> <p>Identify Incident Controller - company OR agency officer such as EPA if in attendance. If Agency led then Direct Pallets assumes a support role. If Direct Pallets led then Point Person assumes Incident Controller role.</p> <p>Establish Incident Management Team (IMT) and notify team by SMS alert message.</p> <p>Review available information.</p> <p>Inform IMT meeting. (Those not on site to attend via teleconference).</p> <p>Provide team with report of current situation.</p>

		<p>Identify required resources to assist Incident Controller. If this is not Emergency Services or an authority the site manager is to complete this assessment.</p> <p>Appoint stakeholder liaison person within IMT to liaise with Point Person and manage communication with stakeholders including but not limited to door knock of neighbouring sites if required.</p> <p>Manage the incident and provide resources until resolved.</p>
4	<p>Manage the Incident</p> <p>Actions to address and eliminate immediate risk to people, environment and business operations.</p>	<p>Coordinate incident from 'Response Room' usually located in Main Office.</p> <p>Site communications to IMT via Point Person. Relevant manager from IMT to proceed to site.</p> <p>Site Supervisor to implement site controls and risk mitigation or controls as per plan or as directed by lead agency.</p> <p>IMT to monitor response and effectiveness and action appropriately to ensure risk is control maintained and immediate risk eliminated.</p> <p>Stakeholder liaison to keep stakeholders appropriately informed.</p> <p>Review situation regularly and update site response as required.</p>
5	<p>Manage business back to normal operations</p>	<p>IMT to identify business recovery requirements.</p> <p>IMT to appoint a Recovery Coordinator.</p> <p>Point person to debrief Recovery Coordinator.</p> <p>Recovery Coordinator to plan and implement recovery requirements to achieve normal business operations.</p> <p>Point person to stakeholder liaison when incident under control and liaison to advise stakeholders via door knock when incident controlled and site has returned to normal activities.</p>
6	<p>Incident investigation</p>	<p>Implement incident investigation. Follow incident investigation procedures as documented in WHSE Management System (WHSE).</p> <p>Draft incident report.</p> <p>Conduct debrief meeting with IMT and relevant Management.</p>
7	<p>Corrective actions</p>	<p>WHSE committee to review progress with corrective actions.</p> <p>Update Risk Registers.</p> <p>Review EPIRMP (within 30 days).</p> <p>Implement corrective actions.</p> <p>Review progress at WHSE Team meetings.</p>



Revisions

Revision	Date	Pages	Description	Reviewed
1.1	30/09/2016	2, 4	Changes to personnel and Fire and Rescue phone number. Clarified when to notify emergency services and authorities	AM