

# SITE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Omega Industries Pty Ltd

13-27 Melbourne Road Riverstone NSW 2765

Emergency Response 0405 156 937

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# Site Pollution Incident Response Management Plan



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## Document Control

Issue	Date	Revision Changes	By
1.0	05/03/2019	Draft Plan Developed	Brad Love

## Current Revision

Date Implemented	Version	Approval Position	Test/Schedule	Next Review
05/03/2019	1	Safety & Compliance Manager	12 monthly	05/03/2020

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## Purpose

The purpose of this plan is to outline the site procedure to be followed when responding to a pollution incident to minimise environmental and business impact and to ensure a pollution incident is managed in an effective manner. This procedure has been developed to outline the actions required by site management in the event of a pollution incident. A pollution response procedure is required as part of the site Environmental Protection Licence and can be made available to members of the public on the Omega Industries company website or by written request to the site. The procedure covers potential pollutant hazards and controls and the sites incident response process should a pollution incident occur. Due to unpredictability of incidents and emergency situations it must be understood that some circumstances may arise that are not covered by this procedure but those identified in our site Emergency Management Risk Assessment have been included. This plan does not replace or supersede the site Emergency Management Plan that may also be operational at the same time to manage other types of emergency situations. Upon activation of the pollution response plan the site management team can request the assistance of the business Management Team.

## Introduction

The Omega Industries Riverstone Site occupies 1.2 hectares at 13-27 Melbourne Road Riverstone NSW 2765. The facility comprises of an administration building, staff admedities, manufacturing area, raw material warehousing, distribution warehousing, employee car park and surrounding garden grounds. The site operations hours fluctuate seasonally operating between 6am – 6pm Monday to Friday and from 6am – 2pm on Saturdays. Some Sunday shifts may take place, but this is not part of the normal roster. Industrial businesses border both sides of the property, with the front and rear sides to the road edge. The Melbourne Road travels along the front of the site, and Princes Street to the rear.

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## Definition of a Pollution Incident

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. 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.

## Notification of a Pollution Incident

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 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.

Omega Industries Pty Ltd will report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

## Scope

This PIRMP must be followed by employees, contractors and visitors to Omega Industries Pty Ltd in order to assist in the early response and reporting of a pollution incident.

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## Pollution Response Team Responsibilities

The Pollution Response Team is responsible for assessing the overall severity of the incident and controlling of any pollution incident until such time as the incident is under control and an initial investigation has been completed.

### The Team's responsibilities include:

- Activating the initial incident response to ensure effective control of the situation.
- Activating the site emergency evacuation procedures to ensure the health and safety of all workers.
- Prevent unauthorised access to the incident area.
- Notifying emergency services and appropriate regulatory authorities of the incident
- Notify direct neighbours / members of the community about the incident.
- Respond to issues as they arise during the incident.
- Obtaining and collating information from internal and external sources.
- Ensuring that appropriate personnel are kept informed of the incident.
- Managing internal and external communications.

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## Pollution Incident Response Team Roles

Roles	Responsibilities
INCIDENT CONTROLLERS Production Manager	<ul style="list-style-type: none"> <li>Assess the incident situation and activate the site Emergency Response Team if required</li> <li>Activate the site emergency evacuation procedure.</li> <li>Manage the site evacuation procedure.</li> <li>Liase with emergency services and regulatory authorities upon arrival.</li> <li>Notify appropriate regulatory authorities of the pollution incident.</li> </ul>
EQUIPMENT TECHNICIAN Operations Manager	<ul style="list-style-type: none"> <li>Assess the incident scene and manage the clean-up and control process.</li> <li>During emergency evacuation prevent unauthorised access to the site</li> <li>Upon request contact emergency services.</li> </ul>
COMMUNITY LIASON Safety & Compliance Manager Media Manager	<ul style="list-style-type: none"> <li>Notify direct neighbours and members of the community about the incident</li> </ul>
INCIDENT NOTIFYER Safety & Compliance Manager	<ul style="list-style-type: none"> <li>Assist with Notification of appropriate regulatory authorities of the pollution incident.</li> <li>Obtain and collate information from internal and external services.</li> <li>Maintain documentation of evidence provided to authorities.</li> </ul>
INTERNAL COMMUNICATIONS MANAGER Company CEO	<ul style="list-style-type: none"> <li>Manage internal communications within Omega Industries Pty Ltd</li> </ul>
<p>To maintain employee confidentiality, the Pollution Response Team contact details are held with the Omega Industries Pty Ltd Emergency Response Service. Contact details are updated every 6 months or upon change of role. To report an incident or contact the team by calling the Safety &amp; Compliance Manager on 0414 231 649 / 02 9832 0000 Ext 106</p>	

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## Pollution Response Key Contacts

Any pollution incident satisfying the material harm threshold must be immediately reported to relevant statutory authorities by either the Safety & Compliance Manager, Production Manager, Operations Manager, or Company CEO. In cases where material harm level cannot be immediately assessed or insufficient information is available on the severity of the incident, the general advice is to notify the Relevant Authorities and discuss that the situation could not be fully assessed. The incident notification should be limited to facts known and records of the notification must be documented. The following facts should be provided at the time of notification: Location & time, Type of incident (e.g, fire, spill, escape, explosion) and Initial response taken

## Regulatory Contacts

Type	Contact Details	Role Required to Contact
Emergency Services (NSW Fire & Rescue)	000	Safety & Compliance Manager Production Manager Operations Manager Company CEO
Department of Environment & Heritage (NSW EPA)	02 9695 2777 Environment Line: 131 555	
Ministry of Health (Pollution Incident)	02 9391 9000	
Worksafe NSW	13 10 50	
Poisons Information	13 11 26	

## External Services Contacts

Type	Contact Details	Role Required to Contact
Electricity Supplier – Origin Electricity	1800 752 371	Safety & Compliance Manager
Gas Supplier – Energy Australia	13 34 66	Safety & Compliance Manager
Water Supplier – Sydney Water Corp	13 20 90	Safety & Compliance Manager

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## Neighbour Contacts

Relation to Omega Site	Name/Type	Location	Contact Details	Role Required to Contact
Front Street Face	Aarti Metal Fabrications	20 Melbourne Road	0410 364 373	Safety & Compliance Manager
Front Street Face	Carrington Products Metal	22-26 Melbourne Road	(02) 9627 4277	Safety & Compliance Manager
Front Street Face	Vacant Building	18 Melbourne Road	TBA	Safety & Compliance Manager
Front Street Face	Town & Country Electrical	16 Melbourne Road	02 9627 6044	Safety & Compliance Manager
Front Street Face	Trade Tyre Distributors	10-14 Melbourne Road	02 8889 7600	Safety & Compliance Manager
Left Hand Side	Wrapt Freight	11 Melbourne Road	02 8332 3054	Safety & Compliance Manager
Right Hand Side	Vacant Office Building	Melbourne Road	TBA	Safety & Compliance Manager
Rear Street Face LHS	Steeline Riverstone	68 Princes Sreet t	(02) 9838 1880	Safety & Compliance Manager
Rear Street Face RHS	Australian Metal Recycling	10-12 Princes Street	(02) 9627 4396	Safety & Compliance Manager
Across Street	Vacant Factory Building	Princes Street	TBA	Safety & Compliance Manager

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## Potential Pollution Incidents

Incident Type	Possible Case / Hazards	Incident Response	Site Controls	Likelihood
Pollution from fire	<ul style="list-style-type: none"> <li>Smoke to air and danger to surrounding areas.</li> <li>Dangerous goods spill.</li> <li>Ignition source in hazardous area.</li> <li>Equipment electrical failure</li> </ul>	<p><b>Minor Scenario response (Smoulder/spot fire)</b></p> <ol style="list-style-type: none"> <li>Control Fire/ smoulder.</li> <li>Notify Site Management</li> <li>Report through normal incident channels</li> </ol> <p><b>Major Scenario response (Factory Fire/Explosion)</b></p> <ul style="list-style-type: none"> <li>Activate the nearest emergency alarm</li> <li>Contact site manager to notify emergency services</li> <li>Safety &amp; Compliance Manager to inform neighbours of incident.</li> <li>Attack fire if safe to do so</li> <li>Shut down equipment</li> <li>Evacuate to safe assembly area</li> <li>Remain in assembly area until the all clear is given by emergency services and Chief Fire Warden.</li> <li>Clean the area and remove damaged equipment.</li> <li>Hold a debrief session to document site response and determine improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>Extinguishers</li> <li>Hose Reels</li> <li>Sprinkler System</li> <li>Alarm System</li> <li>Fire Team</li> <li>First Attack Training</li> </ul>	Medium

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## Potential Pollution Incidents (continued)

Incident Type	Possible Case / Hazards	Incident Response	Site Controls	Likelihood
Chemical, pigment, fuel and or paint spill	<ul style="list-style-type: none"> <li>Contamination of waterways</li> <li>Forklift contact with tank</li> <li>Dropping IBC Container</li> <li>Tank Damage</li> <li>Leak</li> </ul>	<p><b>Minor Scenario response (Contained Spill)</b></p> <ul style="list-style-type: none"> <li>Attack the spill to prevent spreading, entering storm water drains/waterways.</li> <li>Notify Site Management</li> <li>Barricade spill area to prevent access</li> <li>Use absorbent material to clean the spill</li> <li>Dispose of spill clean-up material appropriately</li> <li>Report through normal incident channels</li> </ul> <p><b>Major Scenario response (Contamination of ground/waterways)</b></p> <ul style="list-style-type: none"> <li>Attack the spill to prevent further spreading or entering storm water drains/waterways.</li> <li>Notify the Site Manager of any loss of containment</li> <li>Use absorbent material to clean the spill</li> <li>Barricade spill area to prevent access</li> <li>Dispose of spill clean-up material appropriately</li> <li>Ensure spill is contained on site and test first flush water before release.</li> <li>Inform regulatory authority if spill not contained to site.</li> <li>Hold a debrief session to document site response and determine improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>Trained and competent forklift drivers with loads secured to tynes Storm water drain shut off valves</li> <li>Bunded areas</li> <li>Spill kits</li> <li>Spills response training</li> <li>Extraction &amp; Dust collector system cleanout and maintenance procedures</li> <li>Manifest listing DG's stored on site</li> </ul>	Medium
Distribution	<ul style="list-style-type: none"> <li>Truck collision causing spill</li> <li>Forklift loading / unloading truck causing spill</li> </ul>	<ul style="list-style-type: none"> <li>Contact freight company</li> <li>Activate emergency response clean up</li> <li>Barricade spill</li> </ul>	<ul style="list-style-type: none"> <li>Chain of Responsibility Audits</li> <li>Load Restraint EPG's</li> </ul>	Medium

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## Potential Pollution Incidents (continued)

Incident Type	Possible Case / Hazards	Incident Response	Site Controls	Likelihood
Release of dust and or pigment	<ul style="list-style-type: none"> <li>Contamination to air</li> <li>Dust Collector failure</li> </ul>	<p><b>Minor Scenario response (Overflow contained onsite)</b></p> <ul style="list-style-type: none"> <li>Control / Clean up dust release.</li> <li>Notify Site Management.</li> <li>Report through normal incident channels.</li> </ul> <p><b>Major Scenario response (Overflow not contained onsite)</b></p> <ul style="list-style-type: none"> <li>Activate the nearest emergency alarm.</li> <li>Contact site manager to notify emergency services</li> <li>Safety &amp; Compliance Manager to inform neighbours of incident.</li> <li>Shut down equipment</li> <li>Evacuate to safe assembly area</li> <li>Remain in assembly area until the all clear is given by emergency services and Chief Fire Warden.</li> <li>Site Manager and Safety &amp; Compliance Manager to inform/Liaise with regulatory authority as required.</li> <li>Hold a debrief session to document site response and determine improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>Dust collectors with fail safe shutdown and maintenance</li> </ul>	Low

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## Site Map – Location

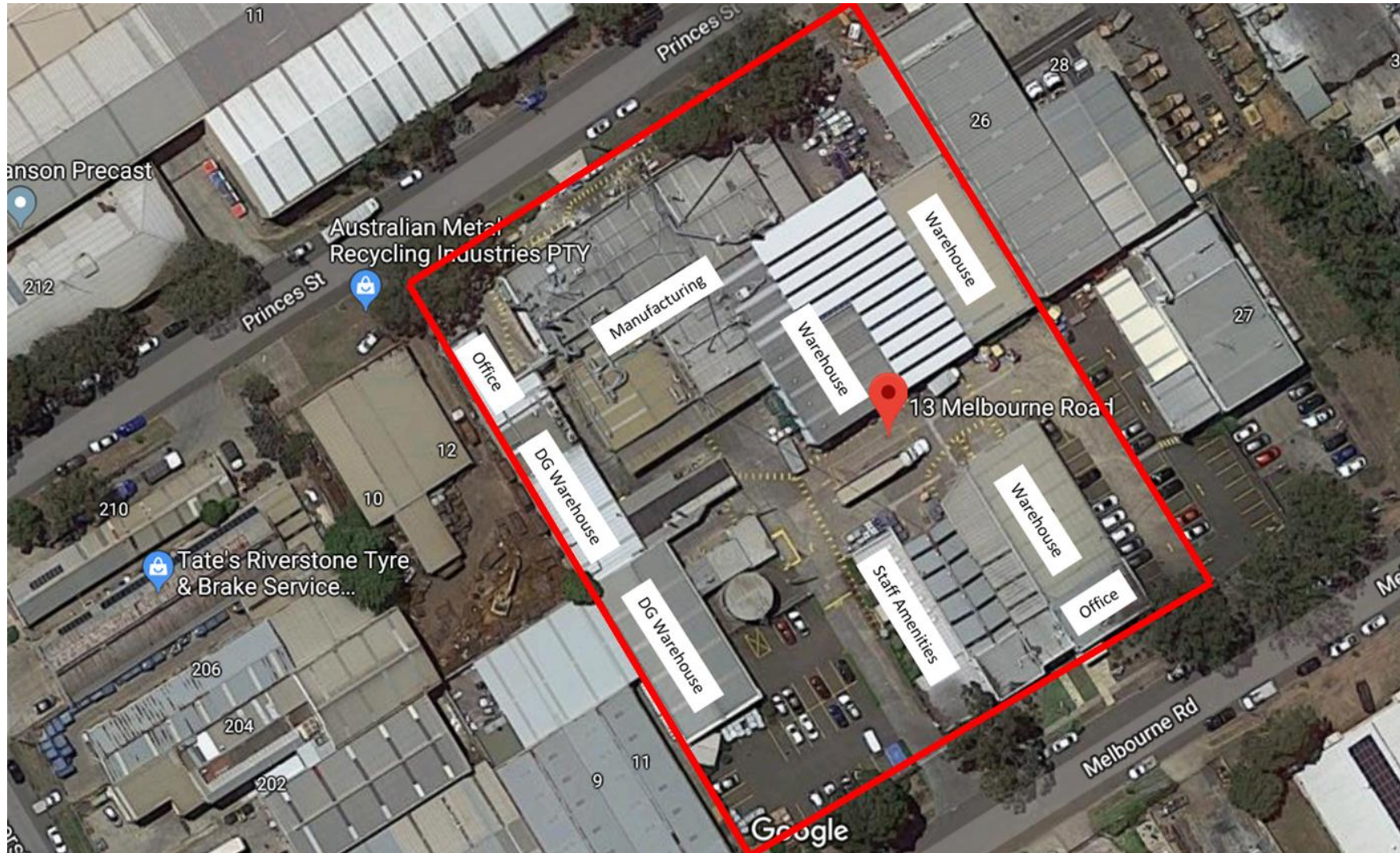


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## Site Map – Factory, Warehouse, Offices



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## Team Training

The pollution response team has been trained in the pollution incident response plan and is made aware of any updates to the plan. The plan will be reviewed as part of the Site Emergency Procedure Review. The Emergency Team has been trained in spill response procedures and are aware of the hazards on site. As part of the Emergency Response Plan regular evacuation tests are conducted.

## Plan Testing

The plan will be tested as part of the Site Emergency Response Procedure. Specific scenarios will be developed to conduct a trial emergency response. The plan will be reviewed yearly as part of the Site Emergency Response Procedure Review.

## Legislation

Protection of the Environment Operations Act 1997 Protection of the Environment Operations (General) Regulation 2009

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