



Pollution Incident Response Management Plan

24-28 Childs Road Chipping Norton NSW 2170

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1. Introduction

(a) Purpose & Scope

Barca Metals is committed to protect the environment and will comply with the requirements of the *Protection of the Environment Operations Act 1997* (POEO Act) and the new requirements introduced by the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). This is incorporated in the POEO Act under Part 5.7A which states, to prepare, keep, test and implement a pollution incident response management plan (PIRMP). It will also comply with the requirements of *Protection of the Environment Operations (General) Regulation 2009* - POEO(G) Regulations.

The objective of this PIRMP for Barca Metals' Chipping Norton site is to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environmental Protection Authority (EPA), other relevant authorities specified in the Act (such as Liverpool Council, NSW Ministry of Health, WorkCover NSW and Fire & Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks.
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

(b) Requirements of the POEO Act & POEO(G) Regulations

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the POEO(G) Regulation. In summary, this provision requires the following:

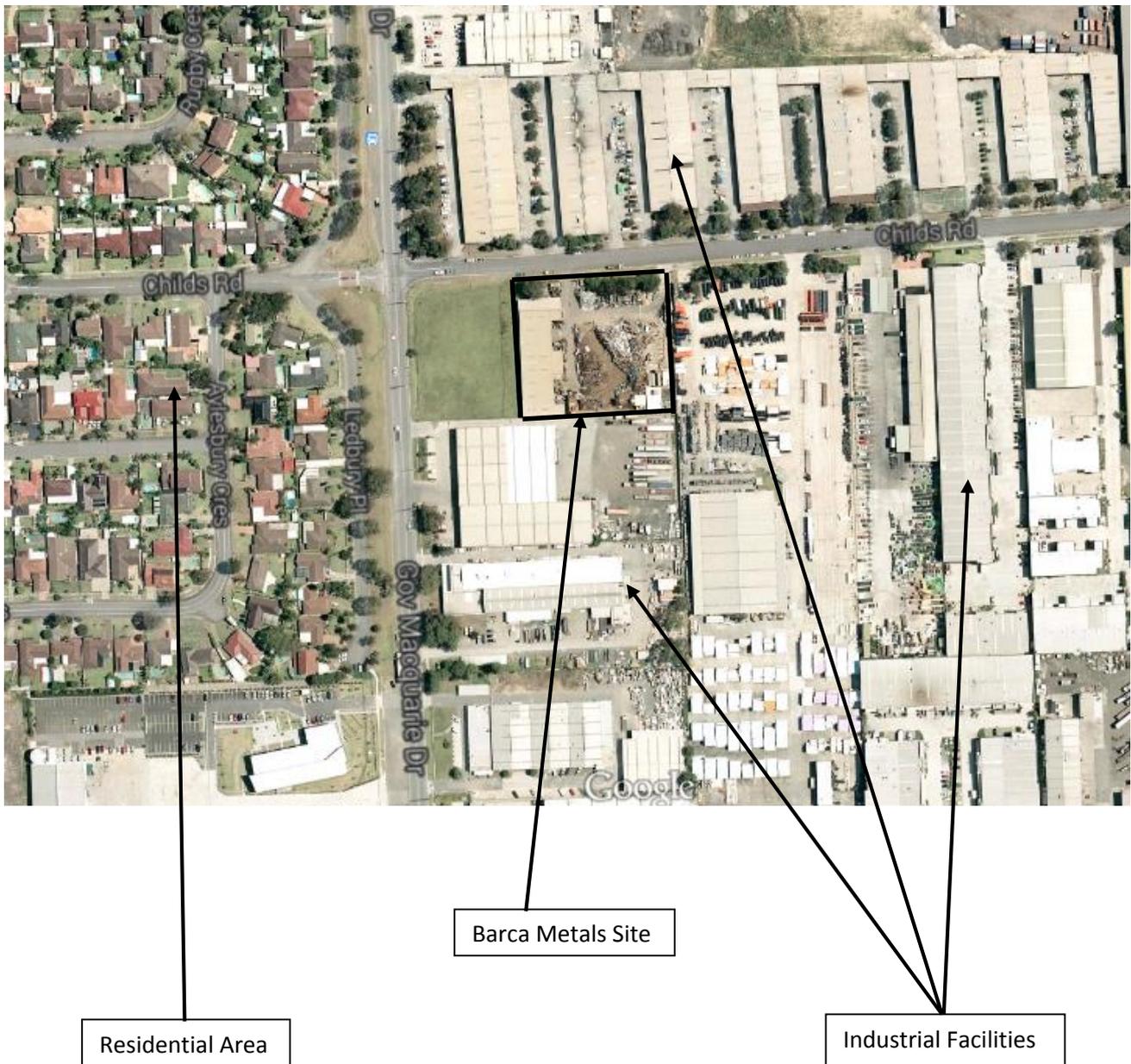
- All holders of environment licences must prepare a pollution incident response management plan (PIRMP) - (section 153A, POEO Act).
- The PIRMP must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation – (clause 98B).
- Licensees must 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 – (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation – (clause 98E).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan – (section 153F, POEO Act).

	The PIRMP may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document.	
POEO(G) Reg Clause 98C	The PIRMP must include:	2(c)
	(a) description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity)	
	(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	2(c)
	(c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity	2(c)
	(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity	2(d)
	(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	2(d)
	(f) a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident	2(f)
	(g) the names, positions and 24-hour contact details of those key individuals who:	3(c)
	(i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the Act, and (iii) are responsible for managing the response to a pollution incident,	
	(h) the contact details of each relevant authority referred to in section 148 of the Act	3(f)
(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 on	3(g)	
(j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	2(f)	

	<p>(k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the 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 stormwater drains on the premises,</p> <p>(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 warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk</p> <p>(m) the nature and objectives of any staff training program in relation to the plan,</p> <p>(n) the dates on which the plan has been tested and the name of the person who carried out the test</p> <p>(o) the dates on which the plan is updated</p> <p>(p) the manner in which the plan is to be tested and maintained</p>	<p>2(a) 2(b)</p> <p>4</p> <p>5</p> <p>6</p> <p>6</p> <p>6</p>
POEO(G) Reg Clause 98E	<p>The testing of a plan 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 the plan is capable of being implemented in a workable and effective manner. Any such test is to be carried out:</p> <p>(i) routinely at least once every 12 months, and</p> <p>(ii) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as 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.</p>	<p>6</p> <p>6</p>
POEO Act Section 153F	<p>If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity.</p>	<p>4</p>

2 (a) Site Details

(b) Immediate Area Likely to Affected by a Pollution Incident



Barca Metals operates a scrap metal processing facility at 24-28 Childs Road, Chipping Norton, NSW. The immediate neighbours are industrial facilities. Immediately to the west is a newly build electricity sub-station. Approximately 200 metres to the west, on the other side of Governor Macquarie Drive are residential houses.

(c) Description & Likelihood of Hazards and Pre-Emptive Actions & Controls.

Hazard	Likelihood & Risk	Pre-emptive Actions & Controls	Final Likelihood & Risk
Fire in stockpile due to ignition by hidden battery.	21 Low	-Strict controls on what is accepted -Strict hot work procedures -Fire hose reels and extinguishers -Emergency Plan	23 Low
Fuel or Oil Spill/Leak due to breakdown, accident or damage.	21 Low	-IBC and Drum Bunds stored undercover and away from stormwater pit. -Spill Containment kits. -Stormwater filtration systems -Regular inspections & maintenance	25 Low
Metal fillings & Other Particulate matter caused by heavy rain	16 Med	- Stormwater treatment systems. System is fitted with by-pass weir system that allows storm conditions to flow without agitating the secondary chamber.	25 Low

RISK RANKING TABLE						
Likelihood	Consequence					Pollution Severity
	Disaster	Very Serious	Serious	Substantial	Minor	
Almost Certain	1	2	4	7	11	The Risk Rating Number will determine the degree of risk associated with a particular hazard.
Likely	3	5	8	12	16	
Possible	6	9	13	17	20	
Remotely Possible	10	14	18	21	23	High Risk (1) = 1 to 6 Medium Risk (2) = 7 to 18
Practically Impossible	15	19	22	24	25	Low Risk (3) = 19 to 25

(d) Potential Pollutants

Product	Storage Location	Storage Method – all undercover	Quantity (litres)	MSDS Issue Date
Hydraulic Oil	Covered Workshop	IBC on IBC Bund	800	13/07/11
Diesel Fuel	Covered Workshop	200 litre drums on 4 drum Bund	800	19/02/13
Engine Oil	Covered Workshop	200 litre drums on 4 drum Bund	800	20/12/10
Waste Oil	Covered Workshop	200 litre drum on 4 drum Bund	200	20/12/10
Degreaser	Covered Workshop	200 litre drum on 4 drum Bund	200	4/11/10
Coolant	Covered Workshop	200 litre drum on 4 drum Bund	200	7/06/10

2(e) Safety Equipment

Item Description	Location	Maintenance Schedule
Fire Extinguishers	Throughout Yard, Workshops, Office and Vehicles – as identified in Emergency Plan	6 monthly as per agreement with NSW Fire Extinguisher Services
Fire Hose Reels	Throughout Yard & Workshop – as identified in Emergency Plan	6 monthly as per agreement with NSW Fire Extinguisher Services
Spill Containment Kit	Yard & Workshop	Monthly
Supasorb	Yard & Workshop	Monthly
Fire Blanket	Lunchroom-Upstairs above Unit 2	6 monthly as per agreement with NSW Fire Extinguisher Services
PPE	Throughout Yard, Workshop, Office & Vehicles	Monthly

(f) Personnel Harm Minimisation

This Pollution Incident Response Management Plan (PIRMP) is an integral part of the management system of Barca Metals and is closely aligned with its Work Health and Safety system. As such, it will be a constant agenda item on the monthly Work, Health & Safety meeting and any issues concerning the PIRMP will also be raised and addressed via this forum. In addition, all employees will be inducted in the PIRMP via the normal new employee induction program or through annual training program.

In the event of an emergency, personnel will follow the directions of the Barca Metals Emergency Evacuation Procedure which amongst other important information, clearly outlines the Emergency Assembly Point, Wardens and contact numbers. All personnel have been trained in this plan and procedure and it is posted in readily accessible locations throughout the yard, workshops and office. The safety of all employees, visitors and the public are assured the highest priority in the event of a pollution incident.

3. Pollution Incident Notification Process

(a) What is a Pollution Incident?

As defined by the EPA, 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 the emission of any noise.

(b) Notification Requirement

Section 147 of the POEO Act states a pollution incident must be notified (a notifiable event) if there is a risk of “material harm to the environment”. In the Act, this is defined as:

- Harm to the Environment is material if:
 - it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10000 (or such amount as is prescribed by the regulations), and
- 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.

(c) Personnel Responsible for Notification Response

Name	Position	Contact Number (24 hours, 7 Days a Week)
Joe Barca	Joint Managing Director	
Tony Barca	Joint Managing Director	

(d) Reporting a Pollution Incident

Employees, sub-contractors, visitors or others who identify that a pollution has occurred or is about to occur must immediately notify their immediate manager and/or the above contacts. If it is considered to be a serious emergency in that it threatens the safety of people or serious property damage, then the individual will follow the Emergency Procedure and contact emergency services on 000 immediately.

The individual/immediate manager must advise (in the first instance) the first contact point above (Joe Barca) and in his absence, the 2nd contact person nominated above (Tony Barca).

The Managing Director immediately assesses whether the event constitutes a pollution incident and if it does, he then follows through on the following steps:

1. Is it a notifiable event?
2. If it is a notifiable event, immediately proceed to notify the contacts as per below table.
3. In the communication to the authorities, ensure the following details are provided:
 - a. Address of premises and location of incident within premises.
 - b. Description of event including the cause, date, time and duration.
 - c. The pollutants involved and estimated quantity.
 - d. Immediate actions (if any) taken to address the pollution incident.

Relevant Authorities in order listed	Contact Number
Fire & Rescue/Police/Ambulance	000
Environmental Protection Authority	131 555
NSW Health – Liverpool Public Health Unit	(02) 9828 3000 (Liverpool Hospital) Ask for Public Health Officer on call
WorkCover	13 10 50
Liverpool City Council	1300 36 2170 or (02) 9821 9222 Ask for Environmental Health Officer

(e) Communication with Neighbours and Local Community

The Managing Director will be guided by the following methodology for community notification:

- Early warning via telephone calls – nearest neighbours that may be affected over following 24 hours.
- Regular updates until incident has been resolved – nearest neighbours who received early warning.
- Updates to the broader community via web-site updates, letterbox flyers, local newspaper, etc.

The information provided will include information such as:

- Type of incident that has occurred;
- Potential impacts to neighbours and the community;
- Barca Metals representative contact details;
- Any advice or recommendations based on the type of incident, scale and pollutants involved.

The nearest neighbours include:

Company	Business Hours Contact	After Hours Contact
Iplex Pipelines	(02) 9755 8214	(02) 9755 8214
Endeavour Energy	131 003	131 003
ABS Transport	(02) 9755 2055	(02) 9755 2055 or (03) 9775 1200

4. Actions to be Taken During or Immediately After a Pollution Incident

The following are the recommended actions to take when confronted with a pollution incident.

Introduction:

The typical pollution incident can be categorised as one of the following 3 events:

1. Stockpile fire
2. Minor Spill or Leak – Diesel, Hydraulic Oil, Engine Oil or Waste Oil
3. Major Spill or Leak – Diesel, Hydraulic Oil, Engine Oil or Waste Oil

MSDS:

1. Ensure you understand where the MSDSs are kept.
2. Always handle the products in line with the recommendations listed in the MSDS

Stockpile Fire

1. If fire is small follow procedures by extinguishing fire with hose reel and/or correct fire extinguisher. If fire is substantial and/or considered unsafe to approach, follow emergency procedures and contact NSW Fire & Rescue on 000. Ensure all personnel follow the emergency evacuation procedure.
2. If safe to do so, move machinery away from fire. Disable by activating the emergency stop.
3. For substantial fires follow through on the above notification procedures to the authorities and community. Advise NSW Fire & Rescue on any potential on neighbours. In turn, they'll advise if neighbours need to be notified and evacuated.
4. Allow NSW Fire & Rescue to deal with the fire.
5. Resolve the problem and table at the next WHS&E meeting.

Minor Spill or Leak

1. Immediately cease the operation. If spillage/leak is from a machine, disable machine via ignition or emergency stop button.
2. If safe to do so, close off the isolation valves specific to that area of the leak.
3. Cease operation of machines and other potential sources of ignition within 10 metres of spill/leak.
4. Contain the spillage to avoid entry into stormwater drains and water ways and minimise surface area of the spill. Use adsorbent material, dirt or sand to contain the spill.
5. Use the contents of the spill container to clean up the spillage material.
6. Record incident on Accident-Incident Report form and update Incident Register.
7. Resolve the problem and table at the next WHS&E meeting.

Major Spill or Leak

1. Immediately cease the operation. If spillage/leak is from a machine, disable machine via emergency stop button.
2. If safe to do so, close off the main isolation valves and valves specific to that area of the leak.
3. Cease operation of all machines in the yard and other potential sources of ignition. This includes mobile phones.
4. Isolate the area around the spillage. Depending on the size of the spillage determines the size of the area. It's important that barricades position personnel away from any toxic fumes.
5. Contact NSW Fire & Rescue Service and other relevant authorities. Advise NSW Fire Service on any potential impact on neighbours. In turn, they'll advise if neighbours need to be notified and evacuated.
6. Contain the spillage to avoid entry into stormwater drains and water ways and minimise surface area of the spill. Use adsorbent material, dirt, sand or dig a trench to contain the spillage.
7. As a secondary measure, use pillows, sand, dirt or other material to block off all entry points into the stormwater drains system.
8. Undertake clean-up of spillage. Seek guidance from the EPA. Licensed external contractors will be required to dispose of contaminated soil, water and product.
9. Record incident on Accident-Incident Report form and update Incident Register.
10. Resolve the problem and table at next WHS&E Meeting.

5. Training of Staff

Employees are inducted when they commence work at Barca Metals. This induction covers all areas of the business including the important subjects of Work Health and Safety and the company's Environmental Policy and its overall commitment to the operating a sustainable business. In addition, there are regular Toolbox sessions on each new project which always addresses the issues of WHS, Environmental, Work Instructions, etc.

The following table provides a breakdown on the specific training undertaken:

Training	Participants	Regularity	Description
Induction	New employees	As required	The induction process involves training on the PIRMP and the Emergency Plan & Procedure. This includes understanding the procedure to follow, the emergency assembly point, 1 st aid, wardens, etc.
Dedicated PIRMP Training	All employees	Every 12 months	During a monthly WHS&E meeting, which involves all employees, we undertake a refresher training course on the purpose of the PIRMP and simulate an event. This is an opportunity to ask questions and suggest improvements.
Emergency Plan & Procedure	All Employees	Every 12 months	The Emergency Plan and Procedure and PIRMP are closely linked – many emergency situations has an impact of personnel health and safety and an adverse impact on the environment. Once per year, we undertake an emergency evacuation drill involving assigned wardens. The drill will encompass an environmental impact.

All training is recorded in the Staff Training Register and details are also filed in the employee's personal file.

6. Testing the PIRMP

Testing of the plan will be a constant tabled item in the WHS&E monthly meeting. The date of testing will be determined at this meeting and testing will occur once every 12 months. The chair of the meeting (Joe Barca – Joint Managing Director) is responsible to ensure it happens. The testing will determine the effectiveness of the plan and any necessary alterations as a result of the test will be made to the plan. The results of the testing will be summarised in the WHS&E minutes and communicated to all as per the procedure.

After a pollution incident, the plan will be reviewed and altered if required and tested within 1 month of the incident date. This event will also be tabled and recorded on the WHS&E minutes.

The testing will be a practical drill involving all Barca Metals personnel. The tests will be planned and directed by Joint Managing Directors Joe and Tony Barca. The date of the test and any subsequent changes to the plan will be recorded on the front of the plan. This test and its results will also be recorded in the WHS&E minutes.

7. Where to Find the PIRMP?

A copy of this PIRMP is held in the front office of Barca Metals Chipping Norton premises, readily accessible to all employees however, under the control of the Joint Managing Directors. A copy is available to an authorised EPA upon request.

A copy of the plan will be made public on the Barca Metals website. However, due to the Privacy and Personal Information Protection Act 1998, certain details will be omitted.