

Purpose:

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy pollution reporting obligations under the Protection of the Environment Operations Act 1997 (POEO Act). This plan outlines the classification, testing, reporting, and management requirements of an environmental pollution incident. The objectives of this plan are to ensure an environmental pollution incident is communicated to all relevant groups and individuals, to prevent, minimise and control the risk of an environmental pollution incident, and appropriately establish and maintain the plan. This plan is a mandatory document on all premises in NSW issued with an Environmental Protection License (EPL).

DOCUMENT REVIEW

Revision	Date	Description	Reviewed By
01	Nov. 2012	Development for License conditions	TJ
02	October 2014	Revised and updated for additional requirements	GG
03	January 2015	Reviewed in line with audit and document requirements	GG
04	July 2016	Revised and updated for additional requirements	AC
05	April 2019	Revise to update change of ownership and management	JS
06	October 2019	Revised and updated to new template	MM
07	April 2021	Annual Review. Minor Amendments to notification to include media.	CL

ADDITIONAL INFORMATION

OWNERSHIP	Austrak National Health and Safety Manager
REVIEW FREQUENCY	Every 12 Months

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Scope

This plan applies to the Wagga Wagga Sleeper Factory

This plan applies to all those activities, products, and services on the site over which it has control or influence.

Distribution Policy

The controlled copy will be retained on the document management system, where it can be accessed by personnel as necessary.

A controlled hardcopy of the plan will be kept by the Factory Manager.

All paper copies of this PIRMP will be considered as 'uncontrolled' unless they have been allocated a 'copy number' in a colour other than black.

The copy of the PIRMP and any monitoring records will be made available on our website.

Terms and Definitions

The following terms, abbreviations and definitions are used in this plan:

Terms	Explanation
IMS	Integrated Management System
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
EPL	Environment Protection License
EPA	Environment Protection Authority
POEO Act	Protection of the Environment Operations Act 1997
ERAP	Environmental Risk Action Plan

Definition of a Pollution incident

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.

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Duty to report a pollution incident

Under the POEO Act there is a duty to immediately report an incident applies where a pollution incident occurs such that material harm to the environment is caused or threatened. It does not matter that harm is caused only at the premises where the pollution incident occurs.

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 \$10,000 (or such other amount as is prescribed by the regulations).
- Leaks, spills, water or air discharges and other pollution incidents can harm the environment. The relevant regulatory authorities need to be informed of pollution incidents immediately, so that action can be coordinated to prevent or limit harm to the environment.

Regulatory authorities and notification responsibilities are outlined below.

Regulatory Authorities and personnel to be notified

Below is a list of the relevant regulatory authorities and personnel to be notified of any pollution incident at the Factory.

Contact	Phone Number
EPA Pollution Hotline	131 555 or (02) 9995 5555 (if calling from outside NSW).
Ministry of Health	(02) 9391 9000
WorkCover	13 10 50
Fire and Rescue NSW.	000
Wagga Wagga City Council	1300 292 442
Austrak National HSE Manager	Vanessa Scott-Hubbard – 0447 098 186
Factory Manager	Jim Stevenson – 0427 751 375

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Notification

Regulatory Authority

Pollution incidents posing material harm to the environment must be notified to the Environmental Protection Authority.

If in doubt as to who to notify, ring EPA's Pollution Line on 131 555.

The relevant information about a pollution incident required to be reported consists of the following:

1. the time, date, nature, duration and location of the incident
2. the location of the place where pollution is occurring or is likely to occur
3. the nature, the estimated quantity or volume and the concentration of any pollutants involved
4. the circumstances in which the incident occurred (including the cause of the incident, if known)
5. the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution

If the information required by items (3) to (5) becomes known after the initial notification is made, that information must be provided to the authorities immediately after it becomes known.

A person/organisation must notify even though the notification might incriminate the person/organisation. However, the notification is not admissible in evidence against the person/organisation for an offence.

Emergency Services

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If adequate resources are not available to contain the release and if it threatens public health, property or the environment, the NSW Fire Brigades should be contacted for emergency assistance - phone 000.

In addition, if advice is needed on cleaning-up the incident or on the disposal of any resulting waste materials, EPA staff can be contacted 24-hours/day via Pollution Line on 131 555. If the NSW Fire Brigade is called, they may notify the EPA if they consider the environment or public health to be threatened. Notification by the NSW Fire Brigade does not negate the need for person carrying on the activity or the occupier of the premises to notify the EPA.

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Notification Responsibilities

Responsibilities

Under the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- the person carrying on the activity;
- an employee or agent carrying on the activity;
- an employer carrying on the activity; and
- the occupier of the premises where the incident occurs.

At the Wagga Wagga Factory, the Factory Manager and Austrak National HSE Manager must be notified immediately after the person becomes aware of the incident. The Factory Manager or National HSE Manager will then be the point of contact for notifying all relevant regulatory authorities.

Responsibility and notification processes for environmental incidents are recorded in the Factory's Integrated Management System.

Incident response and notification procedure

Below is a step by step procedure for notifying pollution incidents:

6. Assess the situation and if safe to do so, immediately rectify the pollution source and control the migration of any pollution. Ensure access routes for spills to any surrounding drains or waterways are blocked. See Factory ERAPs contained in the IMS for site specific controls.
7. Immediately notify the Factory Manager of the pollution incident, giving details such as location, volumes of pollutants and circumstances of the incident. If the incident is not able to be contained, notify the emergency services to aid in control of the incident.
8. If the incident is deemed to have caused or likely to cause "*material harm*" to the environment, the Factory Manager or delegated representative will immediately notify the EPA giving the details as listed in Section 8.1
9. If further information regarding the incident becomes known after the initial notification is made, that information will be provided to the authorities immediately after it becomes known by the Factory Manager or delegated representative.
10. A Tap Root or iCam investigation is to be undertaken for all notifiable environmental incidents.

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11. Any follow up reports required as per the EPL and conditions will be issued to Austrak Senior Management and the EPA as required by the Factory Manager within the given timeframes. This reporting will detail results of investigation, corrective and preventative actions and will include the following details:
- the cause of the incident
 - any environmental harm or potential harm caused
 - actions that have been undertaken to rectify, reduce or remediate the pollution incident
 - responsibilities for the incident, and
 - actions to be implemented to avoid repeat occurrences of a similar incident.

Community and Stakeholder Notification

- Communicating with neighbours and the local community is an important element in managing the response to any incident.
- The Factory Manager will ensure via direct communication with adjacent potentially affected parties are informed of relevant incidents.
- Direct communication will include as appropriate the use of telephone calls or SMS or other messaging systems; emails to relevant adjacent community representatives and letterbox drops and doorknocking, as appropriate to the circumstances.
- Communications will include as appropriate:
 - Any specific information that could be provided to the community so it can minimise the risk of harm.
 - Including instructions to close windows and doors and remain inside for incidents involving emission of air pollutants,
 - Avoiding the use of water in creeks or rivers affected, or likely to be affected, by a pollutant discharge.

In determining the extent of community notification for potential air emissions, the type of pollutant, prevailing winds, magnitude of an emission, as well as the location of any on-site fallout or off-site impacts and the likelihood of the pollutant reaching ground level will be considered prior to community notification.

External communications to the media Must be approved by CEO. (Includes social Media)

External communications to the community must be reviewed and approved by the Factory Manager prior to release.

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Incident Response Actions

Refer to the Factory IMS Emergency Response and Preparedness section and associated ERAPs for site specific incident response actions to be carried out in the case of a pollution incident.

Appendix D of this plan contains an emergency preparedness and responses for major incidents.

Hazards and Pre-emptive actions

Hazards that may affect environmental and human health are identified in the Factory IMS. The IMS includes a risk management process to be followed including hazard assessment, control and management.

An incident and major hazard risk assessment is contained in Appendix B, including pre-emptive action and controls associated with each of the major incident and hazard assessed.

Other pre-emptive actions taken to minimise the risk of harm to all persons on the premises include:

- Factory HSE Inductions
- Daily Pre-starts and briefings
- Regular inspections and recording and close out of corrective actions
- HSE Leadership visits
- Hazard and near miss reporting
- Factory reviews
- Training and incentive program
- Environmental Audits in accordance with the Austrak audit schedule
- Environmental monitoring

These actions and the associated processes are described in the Integrated Management System (IMS).

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Pollutants kept on site

The following potential pollutants located on the site include:

- Fuels, hydrocarbons, and other chemicals
- Concrete/cement contaminated water runoff
- Excess noise
- Dust generation, air quality and plant exhaust

Small quantities of diesel, petrol and lubricants are kept on site in the hazardous materials containers. These materials will all be stored in appropriately bunded areas as outlined in the Factory IMS.

Environmental Mapping Systems

A detailed map of the site is included in Appendix C.

Safety Equipment

All equipment, controls, incident response plans and management plans will be maintained to prevent any possible harm to human health and the environment. Inspection, testing and review of equipment, controls, documents and systems currently in place at the Factory will depend on issues raised for concern and results from previous reviews.

Safety equipment located within the Factory compound is shown in Appendix C including locations of Fire extinguishers, spill kits and emergency assembly points.

Task specific safety equipment will be described in the Safe Work Method Statements for relevant tasks.

Prepare, Test and Maintain

After preparation of this PIRMP, it is to be tested via a mock pollution incident to ensure personnel are aware of the processes and responsibilities on site.

Testing of this plan and any supplementary amendments that are made are documented and stored with the Factory filing system. These may be requested by the EPA at any time.

A PIRMP Test Tracking spreadsheet can be seen in Appendix A. The PIRMP will be reviewed and maintained to ensure information in the plan is accurate and up to date. The review process will occur every 12 months and within one month of any pollution incident occurring. This will ensure any issues within the plan are identified and revised.

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Staff Training

Prior to commencing work at the factory all staff must attend the following induction program:

Austrak Factory Induction Program

Additionally, all managers, supervisors and staff will be trained progressively. Tool box talks will be presented to educate workers of preventative actions, controls, PIRMP updates, site issues and environmental pollution incidents involved in the site.

Toolbox talks are held on a regular basis. The tool box talk will present a chance for workers to raise any concerns or issues at the workplace and with the IMS and PIRMP.

Records will be kept of all staff who have attended Inductions and specific tool box talks.

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Appendix B – Major hazard and incident risk assessment

Hazard	Potential consequences	Risk	Controls (pre-emptive measures)
Fuel, hydrocarbons and/or Chemicals	Environmental contamination, injured personnel	Medium	<p>Bund and secure storage areas for fuel, oil and other liquid containers in accordance with AS 1940;</p> <p>Materials shall be stored and handled in accordance with MSDS;</p> <p>Absorption material at refuelling and storage areas;</p> <p>Immediately clean up all spills; dispose used absorbents in accordance with site’s waste management procedure and notify the appropriate personnel;</p> <p>All personnel trained in the use of spill kits and spill response and the storage and handling of chemicals in accordance with MSDS;</p>
Concrete/cement contaminated water run-off	Discharge to stormwater, Environmental contamination	Medium	<p>Refer to IMS and ERAP;</p> <p>Installation of all water quality control devices including the pond and water diversion drains;</p> <p>All chemicals stored within bunded areas;</p> <p>Provide awareness training to maintain water quality;</p> <p>Ensure that water from factory discharges into control devices;</p> <p>Utilise wash down and service areas for plant and equipment onsite;</p> <p>Regular audit, inspection and corrective actions;</p>

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Hazard	Potential consequences	Risk	Controls (pre-emptive measures)
Excess noise	Complaints by stakeholders resulting in interruption to site works, hearing damage	Low	Refer to IMS and ERAP; Industrial Noise Policy compliance in accordance with Health and Safety Plan;
Dust/Air Quality/Plant Exhaust	Environmental contamination, Complaints from stakeholders	moderate	Provision of water trucks and sprinklers for dust control; Conveyor fitted with dust covers and head of conveyor fully enclosed; Silos fully enclosed overflow pipe protected with pressure valve and alarm; Minimise traffic on exposed areas during times of high winds; Visually monitor dust generation; Maintenance of Plant and Equipment as per manufactures requirements and Maintenance schedule; Manage aggregate and sand stockpiles within acceptable bin wall height.

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Appendix C – Site Layout Plan



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Appendix D - Emergency preparedness and response

Type of Emergency	Preparation for Emergency	Response to the Emergency
<p>Minor spill of hazardous or toxic substance (< 20L)</p>	<p>Awareness training of appropriate response and procedures to be incorporated into the site Induction.</p> <p>SDS on site for all materials and kept up to date.</p> <p>Adequate supply of absorbent materials available in the site compound and on vehicles at work location.</p>	<p>Report spills immediately to Factory Manager and/or the HSE Manager.</p> <p>Attempts to be made to limit or contain the spill using sand bags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill.</p> <p>Factory Manager to coordinate the response, clean up and disposal of the material.</p> <p>Material to be disposed of in accordance with the manufacturers' recommendations and applicable legislation.</p>
<p>Major spill of hazardous or toxic substance</p>	<p>Awareness training of appropriate response and procedures to be incorporated into the site Induction.</p> <p>SDS on site for all materials and kept up to date.</p> <p>Adequate supply of absorbent materials available in the site compound and on vehicles in work location.</p> <p>Emergency telephone numbers prominently displayed around office and issued to supervisors.</p>	<p>Report spill immediately to Factory Manager who will notify Senior Management.</p> <p>Attempts to be made to limit or contain the spill using sand bags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill, righting overturned containers, transferring remaining material.</p> <p>Implement procedures to notify the relevant authorities in accordance with the IMS and this PIRMP.</p> <p>Factory Manager to coordinate the response, clean up and disposal of the material.</p>

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Type of Emergency	Preparation for Emergency	Response to the Emergency
		<p>If spill is regarded to be outside the onsite resources, then the fire brigade should be called.</p> <p>Where appropriate, evacuation procedures are to be implemented to remove non-essential personnel from the affected area.</p> <p>Emergency response members are consulted.</p> <p>Access and egress to the area is established to ensure the appropriate vehicles have effective access and congestion is minimised.</p> <p>If the fire brigade attends, their senior officer assumes control of the operation with site personnel assisting as required.</p> <p>A full investigation report of the event is to be completed by the HSE Manager as soon as practicable after the area has been secured.</p>
Flood	<p>Remove plant and equipment from low lying areas.</p> <p>If plant cannot be removed, ensure it is secured and in a position where it is unlikely to cause damage.</p> <p>Awareness training of appropriate response and procedures to be incorporated into the site Induction.</p> <p>Monitor flood warnings</p> <p>Maintain high standard for erosion and sedimentation controls.</p>	<p>Stow all minor and small equipment into containers that are to be sealed.</p> <p>Ensure all other materials and plant are either removed from flood affected areas or stowed and secured.</p> <p>All chemicals, fuels and other hazardous substances to be in secured containers and stored within a sealable shipping container.</p> <p>Ensure that construction materials and rubbish does not leave the site.</p> <p>Check effectiveness of erosion and sedimentation devices and other flood controls.</p>

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Type of Emergency	Preparation for Emergency	Response to the Emergency
<p>Severe Storm / High Wind / Dust generation</p>	<p>Daily on site weather monitoring.</p> <p>Awareness training of appropriate response and procedures to be incorporated into the site Induction.</p> <p>Ensure First Aid supplies are well stocked and adequate.</p>	<p>Dust controls in place including wetting down exposed areas, application of soil binding polymer, fencing and barriers.</p> <p>Stop activity if conditions are generating dust.</p> <p>Secure all plant, equipment and materials.</p> <p>If equipment cannot be removed, ensure it is secured and in a position where it is unlikely to cause damage</p> <p>Stow all minor and small equipment into containers, which are to be sealed.</p> <p>All chemicals will be in secured containers and stored within a sealable shipping container.</p>
<p>Fire (other than bushfire)</p>	<p>Awareness training of appropriate response and procedures to be incorporated into the site Induction.</p> <p>Fire extinguishers maintained, clearly labelled and distributed around site compound and vehicles.</p> <p>Training in the use of fire extinguishers and which one to use for each type of fire</p> <p>First Aid supplies are stocked and adequate.</p>	<p>For small fires, attempts to be made to extinguish the fire or limit its spread with available fire extinguishers or water hoses if appropriate.</p> <p>Factory Manager is to be informed immediately.</p> <p>Factory Manager to contact external services where necessary (fire, ambulance) as a precautionary measure.</p> <p>All personnel in the vicinity to be assembled in the Evacuation Assembly Area and a head count performed</p> <p>Any resulting fuel or chemical spill to be handled as detailed above</p> <p>Factory Manager to coordinate with emergency services and provide assistance as required.</p>

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Type of Emergency	Preparation for Emergency	Response to the Emergency
<p>Bush fire</p>	<p>Awareness training of appropriate response and procedures to be incorporated into the site Induction.</p> <p>Fire extinguishers maintained, clearly labelled, and distributed around site compound and vehicles.</p> <p>Training in the use of fire extinguishers and which one to use for each type of fire.</p> <p>First Aid supplies are stocked and adequate.</p>	<p>External services (fire, ambulance) to be contacted.</p> <p>Factory Manager is to be informed immediately.</p> <p>All personnel in the vicinity to be assembled in the Evacuation Assembly Area and a head count performed.</p> <p>All plant and equipment to be secured</p> <p>All fuel and chemicals to be stored and secured within hazardous container.</p> <p>Any resulting fuel or chemical spill to be handled as detailed above.</p> <p>Factory Manager to coordinate with emergency services and provide assistance as required.</p> <p>All nonessential personnel to be evacuated from site on advice from emergency personnel.</p>

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