

Document Title: Pollution Incident Response  
Management Plan

Author: P McGrath  
Approved By:

Revision Date: 17 October 2018

Next Review Date: 17 October 2019

## **POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**CRAWFORDS FREIGHTLINES SANDGATE SITE**

**LOT 12 OLD MAITLAND RD**

**SANDGATE 2304**

**NSW**

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

## TABLE OF CONTENTS

1. PURPOSE
2. BACKGROUND AND SCOPE
3. OBJECTIVES
4. REFERENCES
5. DEFINITIONS
6. ROLES AND RESPONSIBILITIES
7. POLLUTION INCIDENT HAZARDS
8. PRE-EMPTIVE ACTIONS
9. INVENTORY OF POLLUTANTS
10. SAFETY EQUIPMENT AND HARM MINIMISATION
11. CONTACT DETAILS
12. NOTIFIABLE POLLUTION INCIDENT
13. NOTIFICATION
14. ACTIONS DURING AND AFTER INCIDENT
- 14.1 General Spill Response Requirements
- 14.1.1 Identify and Control
- 14.1.2 Response
- 14.1.3 Muster Points
- 14.1.4 Reporting
15. Treatment of Spill Types
- 15.1 Sealed Surface Areas
- 15.2 Unsealed Surface Areas
- 15.3 Spill Adjacent to Wetlands
16. SITE LOCATION MAP
17. TESTING OF THE PIRMP
18. AVAILABILITY OF THE PIRMP
19. REVISION HISTORY

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

## 1. PURPOSE

To provide the procedures for pollution incident and spill response, including internal and external notifications for specific hazards at Crawford's Freightlines Lot 12 Old Maitland Rd, Sandgate site.

Guidance is provided on the notification and containment procedures to be employed in the event of losses of containment that have the potential to harm the environment within or adjacent to the Sandgate site boundaries.

## 2. BACKGROUND AND SCOPE

The Protection of the Environment Legislation Amendment Act 2011 (POELA Act) requires holders of an environmental protection licence to prepare and implement a pollution incident response management plan (PIRMP).

Specific requirements for PIRMPs are prescribed in Part 5.7A of the POELA Act. In summary, the legislation requires the following:

- holders of an EPL must prepare a pollution incident response management plan;
- the plan 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 EPL relates;
- licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E); and
- 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).

Crawford's Freightlines is the holder of EPL 20295, and is therefore required to comply with the provisions of the POEO Act.

Prior to the release of this document Crawford's Freightlines managed environmental incidents in accordance with the relevant procedures detailed in the site Emergency Response Plan. Due to growth and diversity of operations within the Sandgate site, and in the interests of best environmental practice, Crawford's Freightlines management have made the decision to implement a standalone PIRMP.

## 3. OBJECTIVES

The objectives of the PIRMP are to:

- ensure comprehensive and timely notification regarding a pollution incident to persons employed at the site, the EPA, other regulatory authorities and emergency services, and neighbouring facilities that may be affected by the impacts of the incident;

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

- minimise and control the risks associated with a pollution incident at the site by risk identification and development of mitigating actions to control, minimise, and manage risk;
- ensure that the responses detailed within the plan are invoked by trained staff, response personnel are identified; and
- ensure the plan is tested for accuracy and currency and addresses the risks associated with the site operations.

#### 4. REFERENCES

- Protection of the Environment Legislation Amendment Act (POELA) 2011;
- Protection of the Environment Operations Act (POEO) 1997;
- Protection of the Environment Operations Regulation (General) 2009;
- Environmental Guidelines: Preparation of pollution incident response management plans 2012; and
- Crawford's Freightlines Sandgate Emergency Response Plan.

#### 5. DEFINITIONS

##### **Absorbent Material**

Materials that recover hydrocarbon spills through absorption or adsorption

##### **Area Wardens**

As defined in the site Emergency Response Plan

##### **Emergency Controller**

As defined in the site Emergency Response Plan

##### **Emergency Response**

Actions to manage or control an emergency situation.

##### **Emergency Response Teams**

As defined in the site Emergency Response Plan

##### **Emergency Services**

- Fire and Rescue
- Ambulance
- SES
- Police

##### **Environmental Emergency**

A sudden unplanned or unforeseen occurrence requiring prompt response, including but not limited to;

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

- a serious accident
- a medical emergency
- vehicle or plant damage
- fire
- loss of containment
- explosion

### **Hydrocarbon**

All fuels, oils and the majority of lubricants are classified as hydrocarbons

### **Loss of Containment**

An unplanned, uncontrolled loss of containment of a pollutant in any form (typically gas, dust, liquid, solid, gel)

### **Material Harm to the Environment**

Actual or potential harm to the health and safety of humans, animals, bird life (including nesting habitats), fishes or ecosystems.

### **Pollution Incident**

An incident during which or as a consequence of which there is an actual or potential loss of containment or uncontrolled escape of a pollutant.

### **Spill Kit**

Absorbents, spill booms, mats, drain seals, or other control measures designed to control or contain losses of containment.

## **6. EMERGENCY PLAN ROLES**

The roles and responsibilities defined in this plan are consistent with the site Emergency Response Plan (ERP) and as such all respective roles and responsibilities are the same as those identified in Sections 17 and 21 of the site ERP.

The following table 1 and table 2 are an extract of the ERP Section 17 and 21 respectively and detail the roles of all persons involved in the management of a site emergency.

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

**TABLE 1 ROLES AND RESPONSIBILITIES - RESPONSE**

<b>Role</b>	<b>Responsibility</b>	<b>Method</b>
All persons identifying an emergency	<ul style="list-style-type: none"> <li>Report emergency to Chief Warden</li> </ul>	<ul style="list-style-type: none"> <li>Phone/UHF Radio/verbal</li> </ul>
Security Patrols after hours	<ul style="list-style-type: none"> <li>Report emergency to Emergency Controller or 000</li> </ul>	<ul style="list-style-type: none"> <li>Mobile phone</li> </ul>
Chief Warden	<ul style="list-style-type: none"> <li>Alert site response team <b>OR</b></li> <li>Advise Area Wardens to evacuate</li> <li>Advise other site users to evacuate</li> <li>Advise Emergency Controller</li> <li>Brief Emergency Services on arrival</li> <li>Establish cordon at Old Maitland Rd intersection</li> </ul>	<ul style="list-style-type: none"> <li>UHF Radio</li> <li>UHF Radio</li> <li>Phone</li> <li>Mobile Phone</li> <li>Verbal</li> </ul>
Deputy Chief Warden	<ul style="list-style-type: none"> <li>Fulfil duties of Chief Warden in absence</li> <li>Conduct roll call at muster point</li> </ul>	<ul style="list-style-type: none"> <li>As above</li> </ul>
Area Wardens	<ul style="list-style-type: none"> <li>Ensure all staff evacuated in area of responsibility</li> </ul>	<ul style="list-style-type: none"> <li>Conduct sweep of area</li> </ul>
Emergency Controller	<ul style="list-style-type: none"> <li>Alert Emergency Services</li> <li>Establish site cordons</li> <li>Alert neighbouring facilities</li> <li>Ensure evacuation complete</li> <li>Advise Crawford's Directors</li> <li>Monitor first response</li> <li>Coordinate Disaster Victim Registration</li> </ul>	<ul style="list-style-type: none"> <li>Mobile phone</li> <li>Allocate traffic control duties</li> <li>Mobile phone</li> <li>Liase with Deputy chief Warden</li> <li>Mobile phone</li> <li>As required</li> <li>Assist Emergency Services: visitor/contractor/employee registers</li> </ul>
Deputy Emergency Controller	<ul style="list-style-type: none"> <li>Fulfil duties of Emergency Controller</li> </ul>	<ul style="list-style-type: none"> <li>As above</li> </ul>

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

**TABLE 2 ROLES AND RESPONSIBILITIES - REPORTING**

<b>Event Type</b>	<b>Reporting Requirement</b>	<b>Reporting Responsibility</b>
Fire	<ul style="list-style-type: none"> <li>• Fire and Rescue NSW</li> <li>• Workcover NSW</li> <li>• ONRSR if Rail Infrastructure involved</li> <li>• EPA if loss of containment</li> <li>• Product owner</li> <li>• Crawford Directors</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Controller or his delegate</li> <li>• Incident Investigation Stakeholders</li> </ul>
Explosion or Potential Explosion	<ul style="list-style-type: none"> <li>• Fire and Rescue NSW</li> <li>• Workcover NSW</li> <li>• ONRSR if Rail Infrastructure involved</li> <li>• EPA if loss of containment</li> <li>• Product owner</li> <li>• Crawford Directors</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Controller</li> <li>• Incident Investigation Stakeholders</li> </ul>
Major Transport Incident	<ul style="list-style-type: none"> <li>• Fire and Rescue NSW</li> <li>• Workcover NSW</li> <li>• ONRSR if Rail Infrastructure involved</li> <li>• EPA if loss of containment</li> <li>• Product owner</li> <li>• Crawford Directors</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Controller</li> <li>• Incident Investigation Stakeholders</li> </ul>
Loss of Containment	<ul style="list-style-type: none"> <li>• Workcover NSW if DG involved</li> <li>• ONRSR if Rail Infrastructure involved</li> <li>• EPA if pollutant, DG or Hazardous Goods involved</li> <li>• Product owner</li> <li>• Crawford Directors</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Controller</li> <li>• Incident Investigation Stakeholders</li> </ul>
Subversive Activity	<ul style="list-style-type: none"> <li>• NSW Police</li> <li>• Workcover NSW</li> <li>• ONRSR if Rail Infrastructure involved</li> <li>• EPA if loss of containment</li> <li>• Product owner</li> <li>• Crawford Directors</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Controller</li> <li>• Incident Investigation Stakeholders</li> </ul>
Natural Event	<ul style="list-style-type: none"> <li>• Fire and Rescue NSW</li> <li>• Product owner</li> <li>• Crawford Directors</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Controller</li> </ul>

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

## 7. POLLUTION INCIDENT HAZARDS

### HAZARDOUS MATERIALS ON SITE

Hazardous materials and Dangerous Goods used or stored on site are listed in Section 9 Table 3.

#### **Ammonium Nitrate:**

Crawfords Freightlines Sandgate site is classified as a Major Hazards Facility due to the storage of Ammonium Nitrate on the site, the Ammonium Nitrate is stored in bulka bags typically 1.2 tonnes net weight. Ammonium Nitrate is an effective fertiliser, therefore it is regarded as a potential pollutant. The storage and handling of Ammonium Nitrate is strictly controlled by Standard Operating Procedures and is subject to regular scrutiny by audit and reporting requirements from regulators and Crawfords customers alike.

Any loss of containment of Ammonium Nitrate on the site would be accidental, most likely through the handling of bulka bags of Ammonium Nitrate within Stores A and B, or when loading/unloading trucks transporting Ammonium Nitrate.

Care must be taken to ensure spill ingress to waterways is avoided.

#### **Diesel Fuel:**

Diesel is used on site to fuel trucks, forklifts, various plant such as front-end loaders, and trains arriving/departing the site. The diesel is stored in an above ground self-bunded tank.

Loss of containment of diesel is most likely due to accidental damage to vehicle or plant fuel tanks.

#### **Lubricating Oils and Hydraulic Fluids:**

Oils and hydraulic fluids are used for maintenance and servicing of plant, vehicles and equipment stationed at the site. The majority of the servicing work is performed within the workshop area on a concrete floor. Plant that is too large to drive into the workshop is maintained and serviced on an external concrete hardstand area adjacent to the western wall of the workshop.

Aside from minor accidental spills during servicing and maintenance work, the most likely cause of loss of containment would be through catastrophic failure of hydraulic hoses or oil seals/gaskets.

#### **Aluminium Smelting By-Product**

Aluminium smelting by product commonly known as Tapped Bath is stored in bulka bags each typically 1 tonne net weight. The product is classified as a Marine Pollutant for transport by sea.



Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

Any loss of containment of Tapped Bath on the site would be accidental, most likely through the handling of bulka bags of Tapped Bath within Store C, or when loading/unloading trucks transporting Tapped Bath.

Care must be taken to ensure spill ingress to waterways is avoided.

## **8. PRE-EMPTIVE ACTIONS**

In addition to staff training and competency assessments in Risk Assessments and Standard Operating Procedures specific to each product listed below. There are a number of pre-emptive actions employed and documented in the Standard Operating Procedures for each potential environmental pollution risk. These are detailed in the following sections of the plan.

### **8.1 Ammonium Nitrate**

- Stored in dedicated Ammonium Nitrate storage warehouses
- Decanting operations performed within warehouses
- Spill kits located in warehouses
- Fire-fighting water is directed to retention ponds, automatic pump out can be manually overridden
- Strictly controlled product distribution protocols and stock accountability
- All losses of containment of Ammonium Nitrate are recovered by sweeping and containing the product dry.
- Under no circumstances is hosing away of spilt Ammonium Nitrate permitted
- Daily and weekly inspections of storage areas
- Equipment prestart checks

### **8.2 Diesel Fuel**

- The diesel is stored in an above ground self-bunded tank
- All refuelling operations are performed on bunded refuelling “pads” which are located remotely from stormwater drains
- Hydrocarbon spill kits are located at each refuelling location for use in an emergency situation
- Hydrocarbon spill kits are located at each refuelling location for use in an emergency situation
- Regular depot environmental inspections

### **8.3 Lubricating Oils and Hydraulic Fluids**

- Oils and hydraulic fluids are stored in bunded areas of the maintenance workshop located adjacent to the southern perimeter of the site
- A quantity of hydrocarbon spill kits and dry absorbent material is maintained in the workshop to manage minor fluid spills
- Equipment prestart checks

### **8.4 Aluminium Smelting By-Product**

- There is no decanting performed on site, any loss of containment would be accidental
- All losses of containment of Tapped Bath are recovered by sweeping and containing the product dry.
- Under no circumstances is hosing away of spilt Tapped Bath permitted.

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

- Spill kits available in store

## 9. INVENTORY OF POLLUTANTS

TABLE 3 POTENTIAL POLLUTANTS

Chemical or Common Name	DG Class	UN No.	HAZCHEM Code	Maximum Inventory	Storage Type	Location Reference
Ammonium Nitrate	5.1	1942	1Y	4500 tonnes per store	Enclosed warehouse	A Shed & Shed B
Diesel Fuel	C1	N/A	N/A	66,000 litres	Self bunded above ground tank	South west corner of Lot 12
Diesel Fuel	C1	N/A	N/A	Variable	Trucks, plant & equipment train locomotives	Whole of site
Lubricating Oil	None	None	None	400 litres	Consumables container	Container storage area
Hydraulic Fluid	None	None	None	400 litres	Consumables container	Container storage area
Smelting by product Tapped Bath	9	3077	2Z	2000 tonnes	Enclosed warehouse	C Shed

## 10. SAFETY EQUIPMENT AND HARM MINIMISATION

Emergency resources for use in a site emergency are listed in the following table 4 and table 5

### Facility Emergency Control Centre

The FECC shall be situated in Crawfords Operations Office. An alternative FECC location is the Emergency Controllers grab bag located in the Emergency Controllers vehicle. The following information and equipment shall be retained in the FECC by the Chief Warden:

- Site Emergency Plan (ERP)
- Site Pollution Incident Response Management Plan (PIRMP)
- Current SDS
- Site plans
- Current manifest quantities
- Emergency Contact numbers
- UHF radios
- Mobile telephone
- Vehicle and equipment keys

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

**TABLE 4 EMERGENCY RESOURCES**

<b>Function</b>	<b>Resources</b>	<b>Location</b>
Emergency Notification	UHF Radio /Mobile phone  Land line	Area Wardens Chief Warden Deputy Warden Emergency Controller Deputy Emergency Controller Neighbouring Facilities
Spill Recovery and Flood Mitigation	Ammonium Nitrate recovery bags Brooms Minimum 2 per store Shovels Minimum 2 per store Hydrocarbon spill kits Shipping Containers Bulk Ammonium Nitrate vehicles Forklifts 980m 250 micron polythene Diesel sump pumps Prefilled sandbags 4 person boat Front end loader	Ammonium Nitrate stores Equipment container Equipment container Container yard Refuelling points/maintenance Based at facility Based at facility Based at facility Ammonium Nitrate stores Ammonium Nitrate stores Ammonium Nitrate stores Based at facility Based at facility Based at facility
Transport	Light vehicles including utilities and passenger vehicles	Based at facility
Control Room	Initially operations office, would become mobile in the event of an incident escalation	Operations office based at facility, Emergency Controllers light vehicle to be used as mobile control room

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

**TABLE 5 EMERGENCY EQUIPMENT**

<b>Equipment Type</b>	<b>Location</b>
Hydrant booster and backflow control Sprinkler system booster	Adjacent to weighbridge
External Hydrants	C Shed East and West walls D Shed All external walls A and B Sheds North and South Walls
Hose Reels	Located adjacent to store emergency exits
Lay flat hose, branch pipe and stortz fittings	Adjacent to Hydrants
Dry Chemical Extinguishers	All forklifts All heavy vehicles All DG Trailers All Stores Internal all administration buildings
Standard response sprinkler system	All AN Stores
Emergency Warning System	All Buildings
Heat and Smoke Detection	General Store/Mechanics and Admin/Amenities Buildings
Generator Sets	Depot operations areas
Power Isolation	Western end of car park
UHF Radios	Operations office Warden work areas
Helmets	Warden work areas

## **11. CONTACT DETAILS**

Emergency contact details including neighbouring facility contacts are listed in Table 6 on the following page.

Note a general Emergency Contact Listing is appended to the site ERP as Appendix D. Amendments to the site ERP Emergency Contact Listing must be reflected accurately in Table 6 of the PIRMP.

Responsibility for maintaining an accurate contact list is assigned to Crawfords Freightlines HSSE Manager.

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

**TABLE 6 CONTACT DETAILS**

<p><b>POLICE / AMBULANCE / FIRE BRIGADE: Ph - 000</b></p> <p><b>EPA - 131 555</b></p> <p><b>STATE EMERGENCY SERVICES: Ph - 132 500</b></p> <p><b>SAFEWORK NSW - 131 050</b></p> <p><b>ARTC EMERGENCIES: Ph - 0249 029 410</b></p> <p><b>NATIONAL SECURITY HOTLINE: Ph - 1800 123 400</b></p> <p><b>PUBLIC HEALTH UNIT – 4924 6477</b></p> <p><b>CRAWFORDS 24HR RESPONSE LINE - 1800 210 694</b></p> <p><b>CRAWFORDS PUBLIC COMPLAINTS LINE - 1800 218 615</b></p>
---

LOCATION	PHONE	CONTACT	AFTER HOURS
Emergency Controller	0401 050 429	Terry Roberts	0401 050 429
Chief Fire Warden	0408 582 476	Brian Littlewood	0408 582 476
Deputy Emergency Controller	0400 006 190	Stephen Hagan	0400 006 190
Deputy Chief Warden	0429 873 709	Lauren Peppertrees	0429 873 709
Managing Director	02 6573 3515	Peter Crawford	0429 0101 111
Neighbouring Facility	02 4951 2692	Golf Range	0409 661 801
Neighbouring Facility	02 4967 0600	St Josephs Home	0417 022 643
Neighbouring Facility	02 4960 8999	HL Mullane	02 4960 8999
Neighbouring Facility	02 4967 3844	Adbri	0418 684 558
Neighbouring Facility	02 4028 9300	Sibelco	0400 823 106

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

## 12. NOTIFIABLE POLLUTION INCIDENT

A notifiable pollution incident is defined as being an occurrence that causes or has the potential to cause material environmental harm. As a guide, a pollution incident is notifiable if it is an uncontrolled release or movement of a pollutant into a waterway or unsealed surface, or crosses the site boundary. Examples of notifiable incidents include:

- A spill impacting 2HD swamp.
- A spill with potential to impact Iron Bark Creek.
- A significant oil spill on an unsealed surface.
- A significant diesel spill on an unsealed surface.
- A chemical spill.
- A major fire event.
- An explosion.

In the event that the Emergency Controller is unable to establish whether the incident is a notifiable Pollution Incident, the EPA should be notified as a precautionary measure.

## 13. NOTIFICATION

An Emergency Contact listing is located on the previous page.

## 14. ACTIONS DURING AND AFTER INCIDENT

### 14.1 General Spill Response Requirements

In the event of a spill in a warehouse, loading / unloading area or yard area:

**Refer to specific product Safety Data Sheet**

#### 14.1.1 Identify and Control

- The person identifying a spill shall advise their immediate supervisor.
- The supervisor shall inform the Emergency Controller.
- Response management persons shall ensure no run off to sensitive areas by use of bunding, earth damming or other suitable means of containment such as booms or pads.
- All spills shall be recovered as soon as possible - note if the spill involves hazardous materials assistance from Emergency Services will be requested by ringing 000.
- Casualties must be assessed to determine if medical assistance is required.
- Clear area of personnel not required to manage the emergency.
- Use dry clean up procedures and avoid generating dust.
- Wear protective clothing, gloves, safety glasses and dust respirator.
- Place recovered materials in suitable containers for disposal.
- Do not contaminate recovered material with fuel, organic materials, or other chemicals.
- SSAN spills shall also be managed in accordance with TERP and Site Security Plan

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

#### 14.1.2 Response

- The person raising an alarm shall do so by reporting the situation to the Chief Warden
- After hours emergencies shall be communicated directly to the Emergency Controller or in his absence the Deputy Emergency Controller by mobile phone.
- The Emergency Controller or Deputy Emergency Controller shall assess the situation and alert Emergency Services in accordance with 9.2 Levels of Emergency.
- The Chief Warden on duty shall assess the situation and either despatch a response team or initiate the Emergency Procedure by alerting area wardens to evacuate the area
- The Chief Warden shall notify the Emergency Controller or in his absence the Deputy Emergency Controller
- In the event of an evacuation the Chief Warden shall advise other site users to evacuate
- Area Wardens shall arrange the movement of all personnel to a remote Muster Point dependant on the prevailing wind direction and conduct a roll call

#### 14.1.3 Emergency Muster Points

- Point A - Adjacent to Entry gate.
- Point B - Alternative Muster Point for high risk situations - adjacent to HL Mullane
- If an offsite evacuation is required surrounding neighbours shall be advised to evacuate by the Emergency Controller
- If necessary incoming traffic other than Emergency Services shall be restricted from entering Old Maitland Rd at the intersection of Old Maitland Rd and the Pacific Highway. This decision is the responsibility of the Emergency Controller
- All incidents will be managed by the attending emergency services upon arrival at the site of the emergency. Crawfords personnel will not assume control of an incident unless the emergency services in attendance have terminated the emergency and completed an incident hand over to Crawfords

#### 14.1.4 Reporting

- Pollution incidents shall be reported to the Environmental Protection Agency in accordance with the Protection of the Environment Legislation Amendment Act 2011.
- The Emergency Controller, or in his absence the Deputy Emergency Controller is responsible for the reporting of incidents
- As soon as practically possible following the handover of an incident scene to Crawfords Emergency Controller or his deputy, the pollution incident shall be reported to NSW EPA by calling 131 555.

### 15. TREATMENT OF SPILL TYPES

#### 15.1 Sealed Surface Areas

1. Block inlets to nearby surface water drains and sewers with a physical barrier such as:
  - absorbent boom or sock;
  - drain seal covers;
  - a mound of absorbent material such as earth or spill sorb

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

2. Where possible isolate the source of the spillage
3. Wearing the correct PPE, scoop or shovel as much pooled substance as possible into a container or containment area for disposal
4. Label the container with the appropriate markings – refer SDS for guidance
5. In the case of a wet spill, once the spill is removed apply absorbent material to the spill area
6. In the case of a dry spill, sweep the area with an approved broom and place the sweepings in an approved recovery bag
7. Once all the wet spill has been removed, shovel absorbent into an approved recovery container and request disposal instructions
8. Do not hose down contaminants or excess absorbents into drains
9. Follow incident reporting protocols

### 15.2 Unsealed Surface Areas

To remove any contaminants that is absorbed into unsealed surfaces and prevent further contamination, the following steps are to be followed.

1. Block inlets to nearby surface water drains and sewers with a physical barrier such as:
  - absorbent boom or sock;
  - drain seal covers;
  - a mound of absorbent material such as earth or spill sorb
2. Where possible isolate the source of the spillage
3. Wearing the correct PPE, scoop or shovel as much pooled substance as possible into a container or containment area for disposal
4. Label the container with the appropriate markings – refer SDS for guidance
5. Excavate the contaminated soil
6. Store the contaminated soil in a containment area on site until arrangements have been made for disposal. The containment area should be concrete or plastic lined
7. Contact the HSSE Manger for disposal instructions
8. Significant spills may require collection and analysis of soil samples from the site of the spill recovery, the HSSE Manager will advise regarding this requirement
9. When advised by the HSSE Manager, backfill the excavated area using clean fill material
10. Follow incident reporting protocols

### 15.3 Spill Adjacent to Wetlands

To prevent environmental harm to sensitive aquatic environmental receptors, the following steps should be followed.

1. Immediately cease all activities in the area. Advise the HSSE Manager
2. Where possible isolate the source of the spillage
3. Place booms or absorbent socks adjacent to and on the downslope of the spill area to prevent further movement of the contaminant
4. Place booms or absorbent socks adjacent to affected wetlands areas
5. Request further instructions from the HSSE Manager



### 16. SITE LOCATION AND SURROUNDING INFRASTRUCTURE

Figure 1 shows the location of the site (outlined in yellow) with neighbouring industrial and residential infrastructure.

**Figure 1 Site Location**



Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019

**17. PLAN TESTING TRAINING AND REVIEW RECORDS**

The PIRMP shall be reviewed at least annually, or prior to a new process or potential contaminant being introduced to the site, or as the result of a plan test.

- 1. Plan testing shall initially be in the form of a table top review and test, then field tested annually, or within 1 month of a pollution incident occurring.
- 2. Review and testing participants must include the Emergency Controller and appropriately selected area wardens.
- 3. The PIRMP may be tested and reviewed in conjunction with the site ERP.
- 4. Amendments, revisions and testing history shall be recorded in Table 7 Testing and Revision History.

**18. AVAILABILITY OF THE PIRMP**

A master copy of the PIRMP shall be maintained in Crawfords Freightlines R Drive. A PDF version of the plan shall also be displayed in Crawfords Freightlines Shared Drive and in a prominent position on the Crawfords Freightlines website.

**19. REVISION HISTORY**

**TABLE 7 TESTING AND REVISION HISTORY**

Date	Test Type (Field or Desktop)	Participants	Comments Plan Amendments Required

Document Title: Pollution Incident Response Management Plan	Author: P McGrath Approved By:
Revision Date: 17 October 2018	Next Review Date: 17 October 2019