



Port Botany Terminal

Pollution Incident Response Plan (PIRMP)



Courtesy of Bob Wood - Patrick Port Botany Terminal, December 2017

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7. POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Pollution incident response management plan

Licence number: EPL 6962

Purpose:

Patrick Stevedores Operations PTY LTD holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Patrick Terminals PENRHYN ROAD, BANKSMEADOW, NSW, 2019As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act. These emergency response procedures are to be enacted in the event that Patrick's activities have caused or threatened material harm to the environment.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences, and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

Note: This plan must be developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2022.

1.1 POTENTIAL ENVIRONMENTAL INCIDENTS

This section lists identified potential environmental incidents and associated responses and responsibilities. Mitigation measures from the Patrick Operation Environmental Management Plan (OEMP) and associated sub-plans will be implemented to counter the occurrence of such events.

1.1.1 Dust

Incident	Response	Responsibility
Dust event due to weather conditions: High winds	Dust generating activities will cease under direction of the Stevedoring, Landside or E&M Manager, or ESC Manager. Dust generating items will be water sprayed or covered.	Stevedoring, Landside or E&M Manager, or HSE Manager
Dust event due to a particular construction activity	Dust generating activities will cease under direction of the Stevedoring, Landside or E&M Manager, or ESC Manager until dust is adequately contained. Remedial measures will be implemented prior to recommencing work.	Stevedoring, Landside or E&M Manager, or HSE Manager
Community complaint relating to dust	Any dust complaints received from the community will be recorded, promptly investigated.	HSE Manager
Dust monitoring equipment damaged or not operational	Record the incident in NOGGIN. Measures such as relocation, replacement or adjustment will be implemented by ESC Manager. If integrity of the sample is compromised, the monthly results will be recorded as a minimum and the incident recorded.	HSE Manager

1.1.2 Soil/Water

Incident	Response	Responsibility
Unauthorised discharge of water that does not meet criteria	Discharge to immediately cease. Water to be treated to meet acceptable criteria prior to release. Incident report to be completed by the ESC Manager and corrective and preventative action implemented prior to discharge recommencing. EPA & NSW Ports / PA of NSW will be contacted immediately should the incident cause is likely to cause environmental harm.	HSE Manager
Oil or fuel spill (e.g. hydraulic hose burst)	Machinery or process to cease, if safe to do so. Rectify spill source and spill kit to be used to contain and clean up spill. Machinery or process responsible for the spill is not to start operation until a full inspection and necessary repairs / corrective action has been implemented. Superintendent responsible for the machinery and process, environmental manager responsible for the clean-up operation.	HSE Manager

1.1.3 Noise and/or Vibration

Incident	Response	Responsibility
Noise levels from operation activities exceed criteria	Noisy activities would cease or reduce under direction of the Stevedoring, Landside or E&M Manager, or ESC Manager. Remedial measures would be implemented prior to recommencing work, and monitoring undertaken to verify noise levels. EPA & NSW Ports / PA of NSW will be contacted immediately should the incident cause is likely to cause environmental harm.	Stevedoring, Landside or E&M Manager, or HSE Manager
Community complaint relating to noise	Any noise complaints received from the community will be recorded, investigated within one hour, and addressed. Attended noise or vibration monitoring would be offered if the complaint is not immediately resolved.	HSE Manager
Noise monitoring equipment damaged or not operational	ESC Manager to record event into NOGGIN, then replace or adjust equipment. If integrity of recorded data is compromised, the 6-monthly result would be recorded as a minimum and the incident recorded.	HSE Manager
Vibration causing structural damage	Activities causing vibration would cease under direction of the Stevedoring, Landside or E&M Manager, or ESC Manager. Any occupants of the buildings may be evacuated with due consideration to safety, and the area secured to prevent unauthorised access. A structural assessment would be under taken and the results compared with any previous condition survey; and if any damage is associated with construction, rectification work would be implemented or compensation agreed.	Stevedoring, Landside or E&M Manager, or HSE Manager

1.1.4 Waste

Incident	Response	Responsibility
Hazardous waste generated	Waste can only be removed by an appropriately licensed transporter of hazardous wastes. Dockets to be provided containing the details of the waste and the final acceptance and disposal of the waste. Prior to transportation the hazardous waste will be stored in a secure and impermeable area.	HSE Manager
Emergency waste removal	An appropriately licensed waste contractor will remove waste as detailed above in the event of an emergency. EPA and NSW Ports/ PA of NSW will be contacted immediately should the incident cause is likely to cause environmental harm.	HSE Manager
Community complaint relating to litter or waste	Any litter or waste complaints received from the community will be recorded, promptly investigated and addressed.	HSE Manager

1.1.5 Contamination

Incident	Response	Responsibility
Unanticipated contamination soil require offsite disposal	Unexpected finds protocol to be implemented. Classify the sediment. Notify NSW Ports / PA of NSW of the requirement to remove the sediment from the project site. Once approval is received from NSW Ports / PA of NSW, transport to a suitable waste facility.	HSE Manager

1.1.6 Pest Management

Incident	Response	Responsibility
Predation of shorebirds	Contact and inform EPA Wildlife Management Officer. Implement control methods that are outlined in Feral Animal Management Plan. If predation increases, increase monitoring levels to adequately assess the threat, and plan deterrent or control methods as outlined in Feral Animal Management Plan.	HSE Manager
Vandalism or damage to property including damage to fences, building, etc.	Inform Stevedoring, Landside or E&M Manager, or HSE ESC Manager to ensure repair replacement. Raise Damage report in NOGGIN and report event to Stevedoring & Operations Managers.	Stevedoring, Landside or E&M Manager, or HSE Manager

1.1.7 Bird Hazard

Incident	Response	Responsibility
Bird strike caused by bird from terminal	Patrick PBT to determine an appropriate response on a case by case basis.	HSE Manager
Target bird species show sustained increase in numbers	Implement deterrents as per Bird Hazard Management Plan.	HSE Manager
Deterrents are not effective against target birds	Implement deterrents as per Bird Hazard Management Plan.	HSE Manager

1.1.8 Shorebird Management

Incident	Response	Responsibility
Arrival of Little Tern	Contact EPA at the outset of arrival.	HSE Manager
Observation of Little Tern nesting or preparing to nest	Contact EPA at the outset of arrival.	HSE Manager
Oil spill	Notify EPA immediately; Respond as per ERP; Notify NSW Ports / PA of NSW within 2 hours of any incident with actual or potential significant offsite impacts, full written detailed reported within 24 hours; Immediately notify the Harbour Master (via NSW Ports / PA of NSW).	HSE Manager

1.1.9 Heritage Management

Incident	Response	Responsibility
Indigenous heritage item found during excavation	Cease works and stabilise the area, under the direction of the E&M Manager and/or ESC Manager. The ESC Manager is to report the remnants to OEH and La Perouse Local Aboriginal Land Council. Request an archaeologist to assess the significance and archaeological potential of the uncovered feature.	HSE Manager
European heritage item found during excavation	Cease works and stabilise the area, under the direction of the E&M Manager and/or ESC Manager. The ESC Manager is to report the remnants to OEH. Contact an archaeologist to assess the significance and archaeological potential of the uncovered feature.	HSE Manager

1.1.10 Penrhyn Estuary Works

Incident	Response	Responsibility
Unapproved works undertaken in Penrhyn Estuary	Immediately cease all works and retrieve any equipment from the estuary. Assess for damage to habitat or roosting birds. Call an appropriate avian ecologist to inspect the site to assess any impacts from the unapproved works. Report the incident to NSW Ports / PA of NSW Environmental Representative.	HSE Manager
Approved works in Penrhyn Estuary environmental controls fail, impacting the estuary	Immediately cease all works and contain any sources of sediment, fuel or any other pollutants. Block drainage lines from the landside if applicable to stop pollutant entering the estuary. Inspect all environmental controls and ensure they are all functional; sediment fencing, silt curtain, sandbags, sediment socks. Call silt curtain contractors to aid in rectification if required. Report the incident to NSW Ports / PA of NSW Environmental Representative.	HSE Manager

1.2 POTENTIAL ENVIRONMENTAL HAZARDS

Hazard	Risk Outcome	Risk Cause	Owner	Inherent Risk				Existing/ Additional	Control	Hierarchy of Control Category	Residual Risk				Control Status
				C	L	RR	R				C	L	RR	R	
<i>What could cause injury / harm? One hazard per cell - where multiple hazards exist for any process, continue to list in separate cells down the column</i>	<i>What could be the outcome after being exposed to the hazard? A list of likely outcomes per listed hazard</i>	<i>How could the hazard result in injury / harm? A list of possible causes per listed hazard</i>	<i>Individual owner of this risk One owner per risk</i>	<i>Consequence</i>	<i>Likelihood</i>	<i>Risk Ranking</i>	<i>Risk</i>	<i>Existing = In place, Additional = Planned</i>	<i>Detail the method of control or mitigation While there may be multiple controls for any one hazard - list one control per cell only</i>	<i>Elimination Substitution Isolation Engineering Administrative PPE</i>	<i>Consequence</i>	<i>Likelihood</i>	<i>Risk Ranking</i>	<i>Risk</i>	<i>In progress Effective Ineffective Not Tested</i>
Hazardous / Dangerous Goods - container leak or spill on the wharf or ship	Contamination to environment (Water, air)	1. Structural failure of cargo 2. Internal load shift 3. Inadequate packing of cargo 4. Damage to cargo	Terminal Manager	4	3	20	High	Existing	Australian Emergency Response Guide Book 2018	Administrative	4	1	11	Low	Effective
								Existing	Patrick Emergency Response Plan 31 Mar 22	Administrative					Effective
								Existing	Vessel Arrival Pre-Operations Checklist	Administrative					Effective
								Existing	Spill Trailer	Isolation					Effective
								Existing	Chit system with hazard identification for unplanned jobs	Administrative					Effective
								Existing	Container placarding (awareness)	Administrative					Effective
								Existing	Dangerous Goods training	Administrative					Effective
								Existing	MSDS on site	Administrative					Effective
								Existing	Hazardous Goods Manifesting	Administrative					Effective
								Existing	Gross Pollution Traps	Engineering					Effective
Spill of diesel fuel as a result of over filling fuel tanks.	Contamination to environment (Water, air)	Defective overfill system resulting in diesel fuel spill	Terminal Manager	3	1	6	Low	Existing	Regular scheduled servicing of truck and equipment	Engineering	2	1	2	Very Low	Effective
								Existing	Engineered trigger to cease pump when full	Engineering					Effective
								Existing	Spill kit	Isolation					Effective
								Existing	Gross Pollution Traps	Engineering					Effective
								Existing	Drain catchment pumping stations (ability to close)	Engineering					Effective
								Existing	Australian Emergency Response Guide Book 2018	Administrative					Effective
								Existing	Patrick Emergency Response Plan 31 Mar 22	Administrative					Effective
								Existing	SOP Diesel Refuelling	Administrative					Effective
								Existing	SWMS Diesel Refuelling	Administrative					Effective
								Existing	JSA	Administrative					Effective
Maintenance in workshop resulting in oil spill or industrial waste from plant or equipment	Contamination to environment (Water, air)	Mechanical Failure error in performing maintenance	Operator Terminal Manager	4	3	20	High	Existing	Australian Emergency Response Guide Book 2018	Administrative	4	2	16	Medium	Effective
								Existing	Chit system with hazard identification for unplanned jobs	Administrative					Effective
								Existing	Patrick Emergency Response Plan 31 Mar 22	Administrative					Effective
								Existing	Gross Pollution Trap	Engineering					Effective
								Existing	Oil captured by oily water separator system	Engineering					Effective
								Existing	Drain catchment pumping stations (ability to close)	Engineering					Effective
								Existing	Regular scheduled maintenance of all terminal plant and equipment	Engineering					Effective
Plant or equipment failure in yard or wharf resulting in oil spill or industrial waste contamination of the surrounding surface area	Contamination to environment (Water, air)	Mechanical Failure	Terminal Manager	3	3	15	Medium	Existing	Chit system with hazard identification for unplanned jobs	Administrative	3	2	10	Low	Effective
								Existing	Gross Pollution Trap	Engineering					Effective
								Existing	Drain catchment pumping stations (ability to close)	Engineering					Effective
								Existing	Australian Emergency Response Guide Book 2018	Administrative					Effective
								Existing	Patrick Emergency Response Plan 31 Mar 22	Administrative					Effective
								Existing	Spill kit	Isolation					Effective
								Existing	Isolation	Isolation					Effective
Hazardous cargo leak / spill from third party equipment (Trucks, cars, contractors)	Contamination to environment (Water, air)	Structural failure or damage to equipment resulting in leak / spill	Terminal Manager	3	3	15	Medium	Existing	Gross Pollution Trap	Engineering	2	2	5	Low	Effective
								Existing	Drain catchment pumping stations (ability to close)	Engineering					Effective
								Existing	Australian Emergency Response Guide Book 2018	Administrative					Effective
								Existing	Patrick Emergency Response Plan 31 Mar 22	Administrative					Effective
								Existing	Cargo placarding (awareness)	Administrative					Effective
								Existing	Cargo manifesting in terminal operating system	Administrative					Effective
								Existing	NSW Road Registration requirements	Administrative					Effective
Noise Pollution	Hearing loss, complaints, breach of lease	Plant and Equipment	Terminal Manager	2	3	9	Low	Existing	Regular scheduled maintenance of equipment	Engineering	2	2	5	Low	Effective
								Existing	PPE Supplied to personnel	PPE					Effective
								Existing	Testing and monitoring conducted 6 monthly as per EPL	Administrative					Effective

