

Pollution Incident Response Management Plan

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Introduction

The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plan (PIRMP) Regulation 2011 requires the holder of an Environment Protection License to have a printed PIRMP available onsite. It was a requirement for all holders of Environment Protection License to have a PIRMP in place by **1 September 2012**. Changes to legislation relating to the 'duty to notify' were enacted on 6 February 2012 in accordance with S.148 of the Act such that 'if there is a risk of **material harm** to the environment, pollution incidents are to be notified immediately to the EPA, NSW Health, Fire & Rescue NSW, WorkCover NSW and the local council.'

This PRIMP has been prepared in accordance with the requirements of Part 5.7A of the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2011, for Birkenhead Point Marina (BHPM).

This Plan will:

- Provide communication about a pollution event to the Appropriate Regulatory Authority and other agencies, and to other people who may be affected by the event
- Reduce the impact of a pollution incident by identifying risks and developing suitable measures to contain and control the effects.
- Ensure the plan is properly implemented by trained staff, identify persons responsible for implementing it, and ensuring the plan is tested annually for effectiveness at BHPM or within one month of any pollution incident occurring. This should address any issues with implementing the plan that become known during, or following an incident. For example, incorrect contact details or an inaccuracy in a map.

It is a requirement of the legislation to report any pollution incident that has, or could cause, environmental harm.

Notifications must be made by telephoning the NSW EPA Environment Line on 131 555. The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident.

In the event of a pollution incident

Call 000

- if the incident presents an immediate threat to human health or property.

Fire and Rescue NSW, the NSW Police and NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order :-



Police, Balmain Station - phone: **9556 0624**



The EPA - phone the Environment Line: **131 555**



Canada Bay Council - phone: **9911 6555**



The Ministry of Health, Camperdown - phone: **9515 9420**



WorkCover Authority - phone: **13 10 50**



Fire and Rescue NSW - phone: **1300 729 579**

Note: if the situation warranted calling 000 as a first point of notification you do not need to ring Police or Fire and Rescue NSW again. However, even if an ambulance attends you need to notify the Ministry of Health.

ATTENTION: Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.

Activities & Potential Hazards

The primary hazards associated with the site are:

- ❖ Hydrocarbon spill into waterway (Diesel or Petrol) – hazard to environment
- ❖ Fire risk of Diesel, Fire and explosion risk of Petrol – hazard to health

A collection of most likely events that could lead to a 'Pollution Incident' are listed below.

POLLUTION INCIDENTS	PRIMARY CONTROLS	LIKELIHOOD
Spillage from bowser during dispensing	Staff training and emergency stop buttons located next to the bowser. Overfill controls on fuel dispensing pumps. Spill kits	Low
Spillage from vessel fuel system and bilge pumping system	Capture system on vessel fuel tank breather / overflow vents	Low
Flooding resulting in escape of product from tanks	Fuel tanks sealed systems – all points of water entry inspected regularly and maintained by specialist contractor	Low
Severe weather event resulting in damage to Marina infrastructure and subsequent fracture of pipeline components	Isolation valves and controls available to minimise any spill. Dual containment systems installed	Low
Collision of vessel with marina causing fracture to pipelines and subsequent leakage of fuel	Pipelines are constructed of double walled polyethylene pipe with low susceptibility to fracture. Pipe work is located in a central service duct, within the concrete marina pontoon	Low
Fire damage and subsequent loss of product from fuel infrastructure	Fire fighting equipment, Emergency Procedures and staff training	Low
Mechanical failure of pipeline, storage and dispensing components / infrastructure	Routine infrastructure inspections and regular maintenance conducted by specialist contractor.	Low
Acts of vandalism or target of terrorist / environmentalist activity	CCTV and Security on all marina arms	Low
Seismic activity resulting in pipeline fracture (Seismic action is known to occur in NSW and VIC)	Dual containment systems installed	Low

Pre-emptive Actions

Birkenhead Point Marina makes every effort to ensure the protection of the environment while conducting its daily activities by maintaining a high level of staff training and employing specialist contractors. Regular reviews are conducted with both staff and contractors to ensure preventative measures are in place to respond to unplanned events or accidents.

Specialist contractors tasks include:

- Scheduled maintenance and inspection of the UPSS
- Reviewing BPHM's Environmental Management Plan
- Risk assessment of equipment and infrastructure
- UPSS wet stock and ground water well monitoring and reporting
- Annual compliance auditing
- Fire fighting equipment servicing
- Staff training

Inventory of Potential Pollutants

Following is an inventory of potential pollutants kept on the premises.

POTENTIAL POLLUTANT	LOCATION & STORAGE VESSEL	MAXIMUM QUANTITY
Diesel		70,000 litres
Petrol		40,000 litres
Oil		100 litres
Sewage pump out		5,600 litres

Safety Equipment

The following is a list of safety equipment kept on site.

EQUIPMENT	LOCATION
Spill kits	On the fuel wharf and head of "B" & "G" arms
Fire extinguishers and hose reels	Every 30m on each marina arm and land based facilities
UPSS isolation valves	All valves are electronically operated and are activated by Emergency "Stop" buttons located at each pump, fuel jetty and outside the marina office, inside the marina office and at the start of the arm.
Personal protection equipment	Marina office, workboat and maintenance shed

Contact Details

This section is to be published on the website version of PIRMP

CONTACT DETAILS

Name	Position	24-hour Contact details
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(i) Plan Activation – Persons responsible to activate response plan

Marina Office	02 9819 6949
After Hours Security	0413 433 766

(ii) Notification of Authorities – Persons who authorise notification
Person in charge at time – as listed above

(iii) Pollution Response – Person responsible for management of response

Marina Manager	02 9819 6949
Assistant Marina Manager	02 9819 6949

(iv) Relevant Authorities – Contact details (in order of industry notification for pollution incidents)

See [PROTOCOL](#) for further information

Fire & Rescue	(if immediate threat to human health or property)	000
EPA (or the Appropriate Regulatory Authority (ARA))	Environmental Line Take note of EPA reference number	131 555
The Ministry of Health	Business hrs	1300 066 055
Local Public Health Line (see www for local unit)	After hours	(02) 9515 6111
WorkCover		13 10 50
Local Authority (Local councils)	Canada Bay Council	(02) 9911 6555
Fire and Rescue NSW	If situation warranted call you do not need to call again	000 1300 729 579
Adjoining businesses /tenants/others at risk	Tenants	
	Senior Facilities Manager Marina/Centre Security	02 9812 8800 0413 433 766
	National Parks Contact Centre	1300 072 757

Communicating with owners and occupiers of local premises / the community

The Marina Manager, or nominated representative of BHPM, upon becoming aware of a notifiable pollution incident or event shall assess the severity of the incident with regards to impact on:

- Owners, tenants and occupiers of local premises
- The community

The following should be considered:

- Does the pollution incident have the potential to affect a business, household or operation?
- Likely effect of the incident
- What actions need to be taken by the properties to protect them from harm?

Contact will be made with affected properties/premises through a door knock and/or letter drop / SMS to provide the following information relevant to the pollution incident:

- What has happened
- The environmental and, or safety implications for them
- Actions taken or being taken to minimise harm or risk
- What to expect
- Contact details for further queries or concerns

In addition, and where deemed necessary, further information may be published on the BHP Marina website.

Minimizing harm to persons on the premises

If a pollution incident provides an immediate risk of harm to persons within, or beyond the site boundary, the evacuation procedures shall be followed.

Evacuation Procedures

During any initiated evacuation of the site, the Area Warden for the Marina is to check all areas / vessels in their vicinity and to direct all occupants to leave via an indicated Emergency Exit or other safe passage.

If safe to do so, a second sweep of the same area must then be conducted to double check that all persons have left the Zone.

The Area Warden for the Marina is to be informed when the Site's evacuation is completed, stating if the area is seemingly clear, or if there is anyone left behind who needs evacuation assistance or who refuses to leave, for whatever reason.

After having reported the evacuation status of the area, Wardens, should assist in leading evacuees to their designated Assembly Areas in Dunlop Park. Evacuees must remain at their Zone's Assembly Area until the Area Warden, or a member of the attending Emergency Services advises the "All Clear".

Evacuation Points & Assembly Areas

All users of the Site should make themselves aware of evacuation points as part of the familiarization with the site's physical features. If there is any doubt as to the location of your designated Assembly Area, seek advice from the Manager.

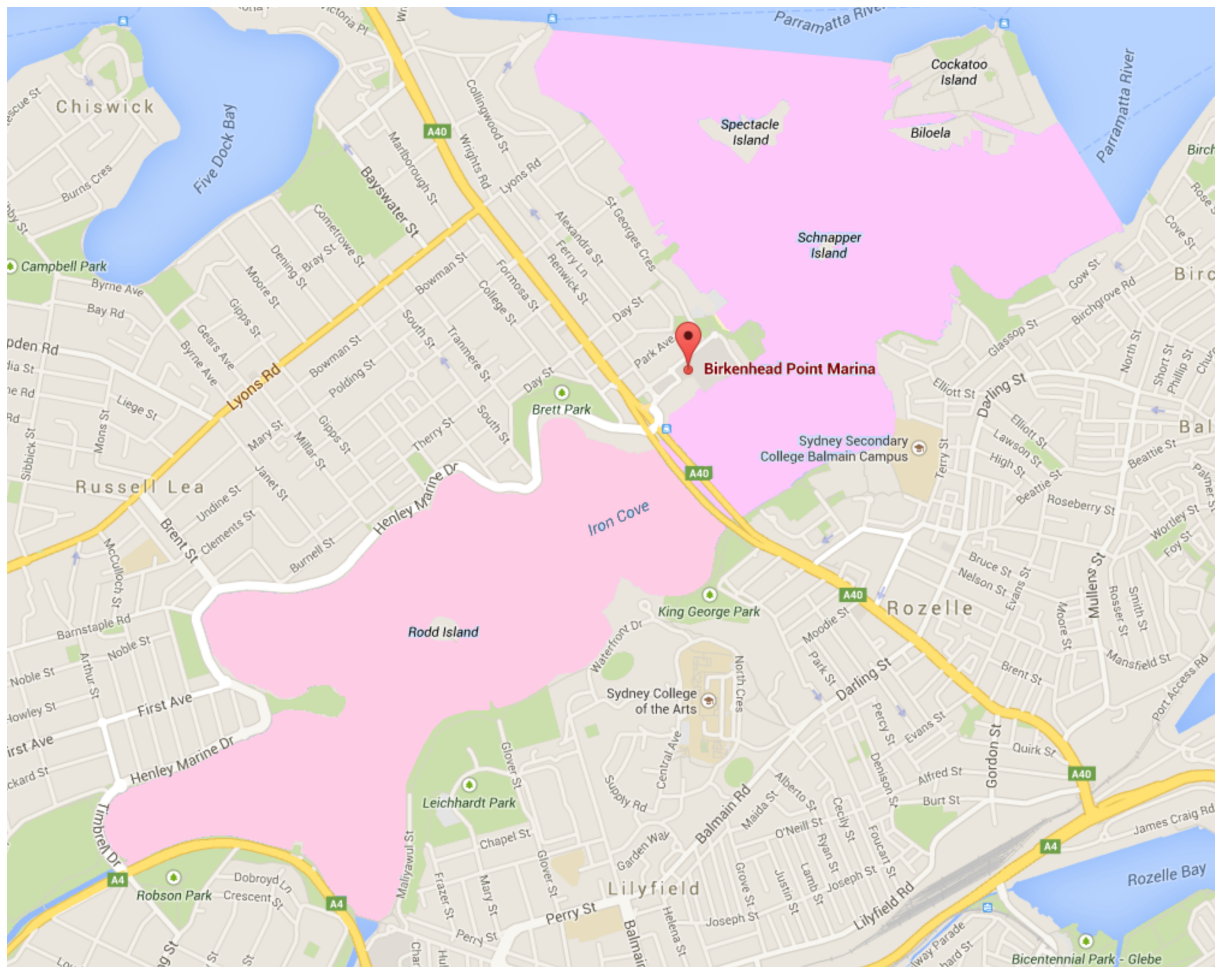
During an evacuation, occupants of the site are to be directed to one of two assembly areas. See Appendix 1.

It is recommended that all staff receive a briefing in relation to the evacuation plan and that an emergency drill be incorporated as part of training and thereafter on an annual basis.

It is recommended that any fire-fighting equipment be clearly marked and maintained and that all users be trained in use of extinguishers

Detailed Maps

Location of the premises and surrounding area, which may be affected in the event of a pollution incident.



Description of how any identified risk of harm to human health will be reduced

Pollution incidents can escalate quickly. BHPM staff have been trained for rapid response to reduce the risk and limit the effects of the incident. The following considerations have been put into place:

Raising the alarm – the marina Emergency Procedures provide the method and means of raising the alarm and responding to an incident

Limiting the extent of pollution – isolation valves and switches are provided throughout the fuel system and shall be operated immediately a leak or spill occurs.

Containing pollution – the spill kit contents shall be deployed to contain any spill in accordance with training provided

Disposal of contaminated waste – any contaminated spill equipment shall be disposed of as contaminated/hazardous waste, depending on the product or fuel contained. A licensed waste contractor with experience and facilities to dispose of such waste will be engaged when necessary.

Fuel and Oil Spills - Action and Response

A small spill is broadly defined as less than 1 litre. A medium spill is 2 to 5 litres and anything over 5 litres is serious and must be reported immediately to the Marina Manager.

- Small oil spills and drips can be dispersed using chemical dispersant, but it is preferable to utilise the oil absorbent cloth or dry-sorb where possible.
- In the event of a medium or serious fuel or oil spill being sighted on the marina the following action must be adhered to:-

Action in the event of a medium or serious fuel or oil spill:

- The manager must be informed immediately to organise a response team.
- Prior to the arrival of the Manager, the Assistant Manager / on-duty dock master is to coordinate the operation.
- The Marina Manager is to assume responsibility upon arrival and deploy all dock masters as deemed necessary. He must also keep the Executive Management updated with the events.
- The spill must be contained by surrounding its perimeter with the **OIL SPILL BOOM**. If spillage occurs from a vessel, surround the entire hull with the floating boom and deploy oil absorbent pads and dry-sorb onto the slick.
- If spillage is within a berth area contain the spill with the OIL SPILL BOOM, plug any gaps between the concrete casements with absorbent cloth and deploy oil absorbent pads and dry-sorb onto the slick.
- Ensure FIRE EXTINGUISHERS are close at hand.
- Isolate the source of the oil/fuel leak. If a fuel line is leaking at the fuel wharf shut down the gate valves on the supply lines and turn off electrical supply to pumps. If fuel is leaking from a boat bilge turn off bilge pump, isolate batteries, open all hatches for venting fumes.
- Keep any persons not involved with the containment operation well clear of the area, under no circumstances allow any person to smoke or start engines of any vessel in the area.
- If necessary, contact the boat owner; advise of the problem and what action has been taken.
- If resources are insufficient to contain the spill, and if it threatens public health, property or the environment, the Fire Brigade should be contacted for emergency assistance.
- If urgent advice is required on cleaning up after an incident or on the disposal of any resulting waste materials, the state environmental protection authority should be contacted.
- A member of the Executive Management team will make all decisions regarding notification of the appropriate authorities in the event of a large spill.
- The Site Manager must inform the Operations Manager (as applicable to business unit); and Divisional/Regional HSE Manager by phone. *Refer to the 'Extreme Incident Notification Flowchart – First 2 hours' as appears below in 4.19.*

Emergency Spill Kits are located on the fuel wharf and at the head of B & G arms. Instructions for the use of these kits are contained within the kit. In case of such spills, the use of an emergency spill kit is recommended and all users of the site should receive a familiarization briefing on how to use the spill kit.

Points to consider when dealing with vessels on the marina

- Not everyone can swim
- In the event of a fire, consider the direction of the wind – will smoke enter the shopping centre?
- If smoke is blowing towards the shopping centre, the centre must be evacuated immediately.
- Boats generally berthed together are likely to burn in mass numbers
- Powerboats with biminis are high risk areas for fire spreading as they are very easily set alight by radiant heat.
- If yachts are on fire be aware of chain-plates being released resulting in the mast coming down.
- Resin burns at about 2000° and is highly toxic.
- A hot fire will send fumes and debris that is still burning up and away very quickly.
- The fire will spread laterally as well as from thermal updraft. You may need to quickly separate vessels.
- Under the terms of the Berthing, Mooring and Storage Agreement the Manager has the right to move any Craft as is seen fit in the event of an emergency.

Staff training for Pollution Incident Response

All employees of BHPM are provided with training on response to a pollution incident. Internal reviews of the PRIMP are held twice yearly to review and test the plan. The review looks at the currency of the information within the plan, placement of the emergency response equipment, accessibility and the effectiveness in the event of a pollution incident. Any recommendations arising from the review are tested to ensure the viability of those alterations before the changes are recorded.

This PRIMP forms part of any new staff member's site induction.

Testing of the PIRMP

The dates this PRIMP was tested and names of people present are recorded and kept in a log which is held in the marina office.

An example of this log appears below.

Date of Testing	Type of Test Conducted (Desktop / Drill)	Observations and components of plan tested	Improvements required (including modifications to future training)

Maintenance of the PIRMP

A training contractor attends the Birkenhead Point Marina site four times a year to conduct staff training covering all aspects of the site, including the marina. The waterfront activities are covered exclusively on one of these visits. Further tool box meetings with staff are held through the year or on an as needed basis.

Updates and revisions of the PIRMP

This Pollution Incident Response Management Plan shall be revised:

- As part of the annual site audit,
- When there are legislative changes or,
- Where a significant pollution incident has occurred or,
- As a result of recommendations from an internal review.

Public Information

The PIRMP can be viewed on Birkenhead Point Marina website

(www.birkenheadpointmarina.com.au) and a full version is available on written request.

Emergency Evacuation Diagram - Marina

