

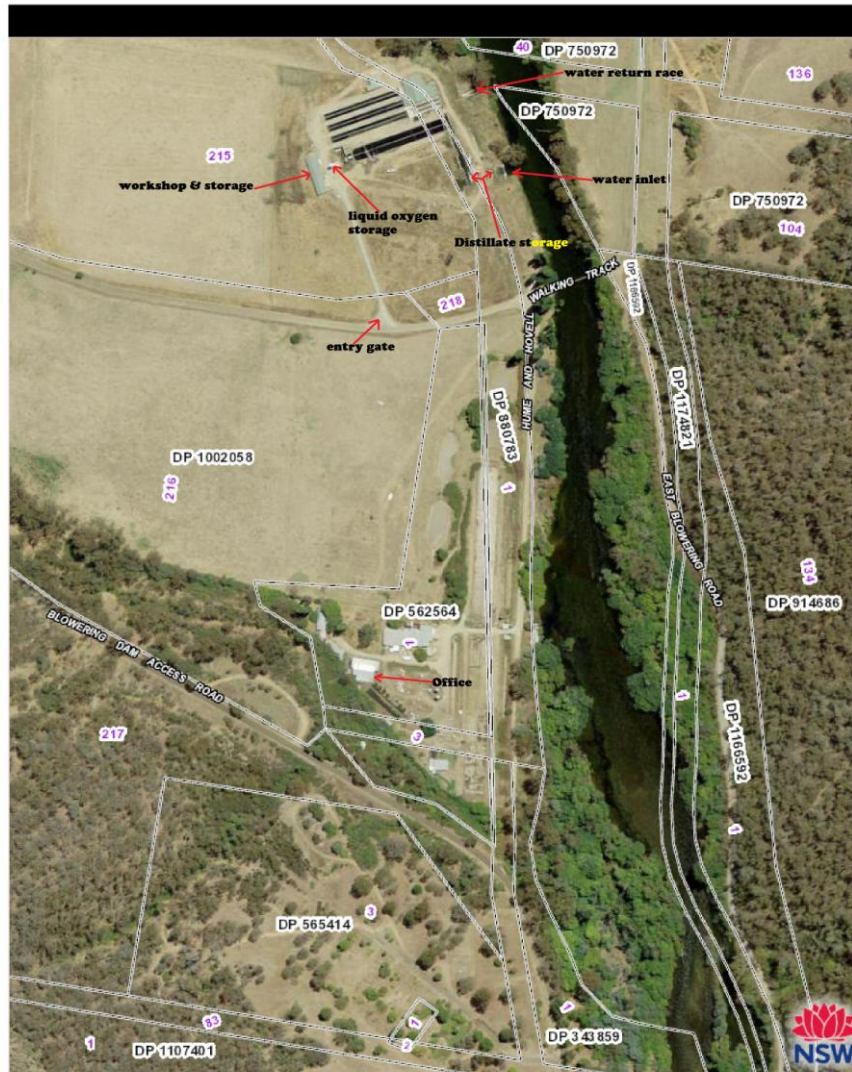
Corporal Pty Limited

Snowy Mountains Trout

# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

For *Snowy Mountains Trout [EPL 3719]*

## Site view



Disclaimer: This report has been generated by various sources and is provided for information purposes only. Land and Property Information (LPI), a division of the Department of Finance and Services does not warrant or represent that the information is free from errors or omission, or that it is exhaustive. LPI gives no warranty in relation to the information, especially material supplied by third parties. LPI accepts no liability for loss, damage, or costs that you may incur relating to any use or reliance upon the information in this report.

### Premises Location

409 West Blowering Road

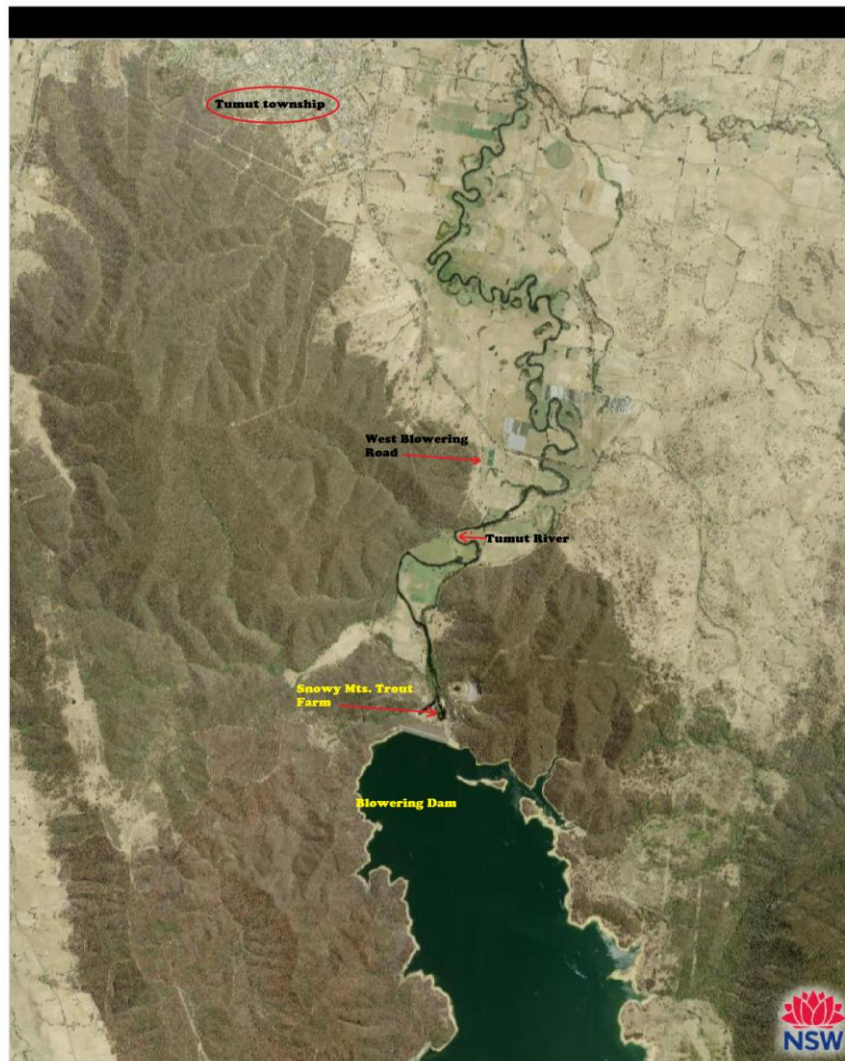
Tumut NSW 2720

Map Co-ordinates

Map 55H

613181.43 East

6083058 North



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Corporal Pty Limited, Snowy Mountains Trout facility location.

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## 1. OVERVIEW

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009*.

This plan has been prepared by Frank Robinson, Environmental Advice ABN **98 311 268 058** to comply with Corporal Pty Limited (the Licensee) obligations under the POEOA Act for Licence number 3719, Snowy Mountains Trout, 409 West Blowering Road, Tumut, NSW.

Under the legislation referred to above, the EPL also requires a PIRMP to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

The PIRMP contains the following sections as required by the regulation:

### Introduction

Snowy Mountains Trout is licensed to Corporal Pty Limited of **Po Box 91 Tumut NSW** 2720.

This site is covered by an Environment Protection Licence (EPL) 3719 for scheduled activity of Aquaculture & Mariculture.

The site has an overarching Environmental Impact Statement supported by an Environmental Management Plan. This Environmental Management Plan sets out how the Farming operation is to be conducted.

Pollution Incident Response Management Plan (PIRMP) preparation is a requirement for holders of Environment Protection Licences (EPLs). Snowy Mountains Trout operates under EPL no. 3719 and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

### Purpose

The purpose of this PIRMP is to improve the way pollution incidents are reported, managed and communicated to the general community.

The purpose of this plan is to:

Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, Fire and Rescue NSW, Rural Fire Service NSW and Department of Primary Industries NSW and the New South Wales Office of Water) 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.

## Scope

This PIRMP is for the use of all Snowy Mountains Trout staff involved in the day to day management, handling and controlling of all Trout Facility operations including such activities as Water supply and discharge qualities and quantities, cleaning of the premises, control of pest species care and movement of fish, fry & fingerlings receival and storage of feedstock's, veterinary medicines, repair and maintenance of plant and equipment and health and safety of all employees and surrounding property occupants and any contractors undertaking works on the site. The PIRMP will be implemented only if material harm in accordance with the description contained in the Protection of the Environment Operations Act to human health or the environment occurs or threatens to occur. (see definitions at Page 20)

The Snowy Mountains Trout site is located 1290 metres Due North of the Blowering Dam Wall and 10 Kilometres SSE of the town of Tumut on the Blowering Dam Access Road.

Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of Snowy Mountains Trout staff to report and respond to pollution incidents in accordance with section 153F of the POEO Act 1997 and the POEO (General) Regulation 2010

## Responsibilities

All Snowy Mountains Trout staff and contractors are responsible for understanding and implementing this PIRMP as appropriately identified. The PIRMP identifies the general roles and responsibilities of how Snowy Mountains Trout staff shall manage pollution incidents in accordance with this PIRMP.

Owners and Supervisors are responsible for ensuring that their staff are aware of the PIRMP and their roles where appropriate. All Management are also responsible for the training of their staff and hold responsibility for:

- ☐ assisting with advice, reporting and response process;
- ☐ ensuring the Plan is made available to staff responsible for implementing the plan and EPA authorised officers;
- ☐ giving advice on whether environmental incidents need to be reported to external agencies;
- ☐ assisting in the notification of pollution incidents to the relevant authorities
- ☐ provision of maps associated with the plan
- ☐ assistance with the implementation of response actions to pollution incidents
- ☐ assistance in communicating with neighbours and the local community about the Plan and when incidents of a reportable nature occur;
- ☐ testing; and
- ☐ Reviewing this plan

## Documentation

The environmental incident register is used to record and monitor all environmental incidents within the Snowy Mountains Trout facility. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept by the Facility Manager, Rod Smith.

## Additional Information

Contact: Rod Smith 02 6947 3612  
Effective date: 31<sup>st</sup> January 2015

Review date: See Updating of Plan

### Emergency contact details

Rod Smith	General Manager	0401 201 439	
Alex Smith	Facility Manager	0408 201 439	
Rural Fire Service		000	
Fire & Rescue NSW		000	
Ambulance		000	
Tumut Shire Council		02 6941 2555	
Emergency Animal Disease Hotline		1800 675 888	
Workcover NSW		131050	
Environment Protection Authority (EPA)		131555	
NSW Health Department		02 9391 9000	
NSW Office of Water		(02) 8281 7777	

## **HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS**

### **Overview**

This chapter deals with the [POEO \(General\) Regulation 2009's sections 98\(a\) to 98\(f\)](#) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to prevent or minimise these risks.

The Snowy Mountains Trout site undertakes the commercial production and sale of processed and unprocessed Fish (trout).

This Plan also considers both air and water based pollution incident impacts. Overall considerable design and written environmental management systems are in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

This Plan uses a modular approach to this risk assessment process. Each module represents an operation undertaken in the farming operation such as use and storage of hazardous chemicals and use and storage of non-hazardous chemicals, the storage and handling of feedstock's, the handling and use of input materials such as Feed and inoculants.

### **Pre-emptive measures to be taken to prevent/minimise any pollution event**

1. Not less than weekly inspections of the water systems are to be carried out by the Facility Manager or their deputy. These inspections are to be recorded together with the associated observations in a record kept for the purposes.
2. Not less than 2 times per week the water return system to the Tumut River within the facility is to be inspected. These inspections are to be record together with the associated observations in a record kept for the purposes.
3. All plant and equipment is to be maintained in proper and efficient working order.
4. All safety equipment, fire fighting equipment, is to be maintained and tested on a regular basis.
5. All fire fighting equipment is to be tested not less than one month prior to the commencement of the declared fire season for the Tumut Shire Council area.
6. Farming is to be dealt with in accordance with best practice procedures.

Actions arising from these inspections are to be recorded in the record. Actions may be problem with over feeding of fish stock and potential high nutrient loaded discharge water held on site?



### **Summary of Pollution Types**

The commercial treatment and handling farmed fish material by its nature has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types found for the Snowy Mountains Trout.

### **List of Typical Main Pollutant Liabilities in Fish Farming operations are listed below**

Description	Comments
<b>Air Based Emissions</b>	
Dust	Dust from internal road ways, is to be minimised as it has the potential to cause issues on site within the fish ponds. Therefore minimisation of dust is an operational priority for the proper operation of the Facility.
Fire	Fire advancing onto the Facility pad is not considered an environmental incident, but the smoke from the fire can be, and can affect neighbours. Fire commencing within the Facility is to be considered a reportable environmental incident and the plan is to be implemented.
Noise	Emitted by plant and equipment is not considered to be a trigger pollutant for the purposes of this plan.
Odour	Odour is generally not associated with this site. Odour incidents are not considered to be material environmental harm, but are included in the PIRMP for consistency.
Flood	Overland flood is considered to be unlikely as the Farming operation is carried out above the 1:100 year flood gradient.

**Inventory of potential pollutants stored/used at site**

<b>Product</b>	<b>Dangerous goods class</b>	<b>Quantity nominally held</b>	<b>MSDS held in office</b>	<b>Product location</b>
<b>Petrol</b>	<b>3 (flammable) UN 1203</b>	<b>60 Litres</b>	<b>yes</b>	<b>Workshop storage area</b>
<b>Vet Chemicals</b>	<b>N/a</b>	<b>20 litres</b>	<b>yes</b>	<b>Facility office</b>
<b>Distillate</b>	<b>N/a</b>	<b>4000 litres</b>	<b>yes</b>	<b>Bunded area adjacent to inlet pumps</b>
<b>Oxygen (compressed &amp; refrigerated)</b>	<b>Class 2 &amp; sub 5.1 UN 1073 Hazchem 2P</b>	<b>30 ton</b>	<b>yes</b>	<b>Between fish pond races &amp; workshop</b>

## Hazard identification & risk analysis

Description	Potential risk	What can happen (event)	Contributing factors	What can happen (Circumstances)	Operational controls	possibility	Consequences	Risk rank
Compressed oxygen leak	Fire / cryogenic liquid (extreme cold)	Death by fire, explosion or extreme cold	Incorrect handling. Impact of tank or lines.	stock loss/injury to staff/damage to infrastructure/damage to neighbouring properties	Only to be maintained / handled and operated by properly trained personnel	possible	critical	Low
Vehicle Facility implement accident	Fire/fuel spill feed/chemical spill	Soil contamination, air pollution contamination of stormwater	Fatigue/weather conditions / congestion	Spill/fire/personal injury	Fatigue/traffic management/training	possible	major	Med
Fuel spill	Contaminated soil/surface water/fire	Damage to fuel storage tank/equipment	Poor operation/vehicle impact/operator error	Contaminated soil/surface water/fire	Training protect tank area	possible	minor	Med
Veterinary Product spill or loss / Chemical spill	Contaminated soil/surface water/fire	Contaminated soil/surface water/fire	Poor storage/operator training/segregation/poor maintenance	Contaminated soil/surface water/fire	Training/regular inspection of store & equipment	possible	major	Med
Fire	Air & soil pollution/livestock loss/structure damage	Off site air impacts/contaminated fire water	Lack of training/maintenance of machinery incl. fire fighting equipment external actions.	stock loss/injury to staff/damage to infrastructure/damage to neighbouring properties	Regular fire training/maintenance of all equipment	likely	critical	Med
Effluent discharge	Contaminated soil/surface water	Contaminated soil/surface water	Return water pipe failure	Contaminated soil/surface water	Regular inspection	possible	minor	Low

Odour emission	Short term air pollution	Minor annoyance of neighbouring property occupants	Failure of waste water treatment system/climatic conditions	Short term air pollution	Proper & correct operation of facility/training	possible	minor	L
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**Pollution incident actions & responses (all contact in table on page 7)**

<b>Pollution incident</b>	<b>Action to be taken</b>	<b>By who</b>	<b>Time frame for action</b>
<p>If the incident poses actual or potential pollution either on-site or off-site including:</p> <p>Smoke Dust Effluent Fuel or chemicals Any other pollutant</p>	<p>1.Report to Facility Manager 2.report to EPA 3.report to Emergency Services 4 Tumut Shire Council. 5.NSW Dept. of Health 6.Fisheries NSW 7.Workcover NSW 8.NSW Office of water</p>	<p>Facility Manager or on duty supervisor</p>	<p>Immediately</p>
<p>Reduce impact</p>	<p><b><u>Only take action if it is safe to do so!</u></b> Limit area of spill (bund, shut off or block leak Commence clean-up If in doubt discuss with relevant combat authority.</p>	<p>Facility Manager Duty Supervisor Site staff</p>	<p>ASAP</p>
<p>Remain available</p>	<p>Assist combat authority &amp; EPA Follow instructions of combat authority</p>	<p>All staff</p>	<p>ASAP</p>
<p>Record the incident</p>	<p>Record all details (cause &amp; effect) in the environmental incident register</p>	<p>Facility Manager</p>	<p>ASAP</p>

**An incident record will contain the following details:-**

1. Date of incident ...../...../.....
2. Time incident noticed .....:.....am/pm
3. Nature of incident. ....  
.....  
.....
4. Time of notifications
  - a. Emergency Services ----(000) .....:.....am/pm
  - b. EPA-----131555 .....:.....am/pm
  - c. NSW Health -----02 9391 9000 .....:.....am/pm
  - d. NSW agriculture -----1800 675 888 .....:.....am/pm
  - e. Tumut Shire Council---02 6941 2555 .....:.....am/pm
  - f. Fisheries NSW-----02 6391 3100 .....:.....am/pm
  - g. Workcover NSW-----131050 .....:.....am/pm
  - h. NSW Office of Water---(02) 8281 7777 .....:.....am/pm
5. Actions taken to prevent/limit/abate pollution, by who & when.  
Name:.....Action taken.....  
.....  
Name:.....Action taken.....  
.....  
Name:.....Action taken.....  
.....  
Name:.....Action taken.....  
.....
6. Staff injuries.  
Name:.....Nature of Injury.....  
Action taken .....  
Name:..... Nature of Injury .....  
Action taken .....
7. Orders by EPA  
Name of EPA officer:.....Order.....  
Action taken .....  
Name of EPA officer:.....Order .....  
Action taken .....  
Name of EPA officer:.....Order.....  
Action taken .....

8. Requests by Combat Authority.

Name of officer:.....Request.....

Action taken .....

Name of officer:.....Request.....

Action taken .....

Name of officer:.....Request.....

Action taken .....

Name of officer:.....Request.....

Action taken .....

9. Date & time incident concluded

...../...../..... at .....:.....am/pm

10. Actions to be taken to prevent reoccurrence of incident.

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if space insufficient for any entry use a separate numbered sheet

## **Staff training**

All Facility staff employed at the time of the commencement of this plan will be trained in its implementation and use with 30 days of the plans commencement date.

All Facility staff will be trained not less than 30 days after commencement of employment

### **Training will consist of the following units:-**

1. Awareness of facility physical layout
2. Safe handling of all inputs and materials
3. Cryogenic liquids safety
4. Fire response internal and an approaching fire
5. Dust generation and avoidance
6. Waste water use safety
7. Incident response
8. Notification procedures
9. Understanding of the hierarchy of incident control & response
10. Responsibilities under this plan
11. Location of all safety equipment
12. Where appropriate, operation of plant and equipment
13. Maintenance of plant and equipment
14. Record keeping
15. Incident reporting procedures
16. Emergency assembly points



**Corporal Pty Limited Snowy Mountains Trout**

**Training session attendance record**

PIRMP training	Date ...../...../2015	Trainer .....	Signature .....
PIRMP testing	Date ...../...../2015	Trainer .....	Signature .....

Employee name	Employee duties	Employee signature

**Testing of plan**

This plan will be fully tested by the staging of a realistic training scenario within 90 days of the commencement date.

Adjustments and modifications will be made to the plan in light of the findings from the training exercise.

**Commencement date**

**This Pollution Incident Report Management Plan is commenced on:-**

**The \_\_\_\_\_ / \_\_\_\_\_ / 2015**

**PIRMP test & amendment record sheet**

<b>Plan test date</b>	<b>Amendment date</b>	<b>Page number</b>	<b>Brief description</b>	<b>Name &amp; signature</b>

## Definitions.

### ***147 Meaning of material harm to the environment***

*(1) For the purposes of this Part:*

*(a) harm to the environment is material if:*

*(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*

*(ii) 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), and*

*(b) 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.*

*(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.*

### **148 Pollution incidents causing or threatening material harm to be notified**

(1) Kinds of incidents to be notified This Part applies where a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened.

(2) Duty of person carrying on activity to notify A person carrying on the activity must, immediately after the person becomes aware of the incident, notify each [relevant authority](#) of the incident and all relevant information about it.

(3) Duty of employee engaged in carrying on activity to notify A person engaged as an employee in carrying on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each [relevant authority](#).

(3A) Duty of employer to notify Without limiting subsection (2), an employer who is notified of an incident under subsection (3) or who otherwise becomes aware of a pollution incident which is related to an activity of the employer, must, immediately after being notified or otherwise becoming aware of the incident, notify each [relevant authority](#) of the incident and all relevant information about it.

(4) Duty of occupier of premises to notify The occupier of the premises on which the incident occurs must, immediately after the occupier becomes aware of the incident, notify each [relevant authority](#) of the incident and all relevant information about it.

(5) Duty on employer and occupier to ensure notification An employer or an occupier of premises must take all reasonable steps to ensure that, if a pollution incident occurs in carrying on the activity of the employer or occurs on the premises, as the case may be, the persons engaged by the employer or occupier will, immediately, notify the employer or occupier of the incident and all relevant information about it.

(6) Extension of duty to agents and principals This section extends to a person engaged in carrying on an activity as an agent for another. In that case, a reference in this section to an employee extends to such an agent and a reference to an employer extends to the principal.

(7) Odour not required to be reported This section does not extend to a pollution incident involving only the emission of an odour.

(8) Meaning of “relevant authority” In this section:

**"relevant authority"** means any of the following:

- (a) the appropriate regulatory authority,
- (b) if the EPA is not the appropriate regulatory authority-the EPA,
- (c) if the EPA is the appropriate regulatory authority-the local authority for the area in which the pollution incident occurs,
- (d) the Ministry of Health,
- (e) the WorkCover Authority,
- (f) Fire and Rescue NSW.

## 2.1 Definition of ‘pollution incident’

The definition of a pollution incident is:

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.

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

(a) harm to the environment is material if:

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) 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), and

(b) 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.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. ‘Immediately’ has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

There are new associated offences, for individuals and corporations, for not preparing a plan, not keeping the plan at the premises to which it relates, not testing the plan in accordance with the Regulations and not implementing the plan in the case of an incident.