

# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



**June 2023** 



#### **Revision history**

Revision history			
Version	Date	Author	Revision details
1	Aug 2015	Lindsay Golsby-Smith	Align with legislative requirements
2	Aug 2016	Lindsay Golsby-Smith	Include feedback from EPA
3	July 2017	Lindsay Golsby-Smith	Update MI staff contact details
4	April 2018	Lindsay Golsby-Smith	Clarify response for chemical spill incident and simplify Appendix 1
5	Aug 2019	Lindsay Golsby-Smith	Update MI contact details
6	June 2020	Fern Dorricott	Reviewed plan, no updates
7	May 2021	Fern Dorricott	Reformat, included hyperlinks to internal MI procedures. Included updated Incident Response Guide, Evacuation maps. Included 'stop pollution source' in steps in s6 to take in response. Checked and amended Notifiable authorities contacts table in plan and Response Guide.
			Updated to meet EPA's template requirements.
8	June 2022	Cindy McGrath	Updated hyperlinks to internal MI procedures. Updated Evacuation maps. Update Griffith City Council and Leeton Shire Council contact details.
9	Oct 2022	Cindy McGrath	Updated plan to incorporate updated Protection of the Environment Operations (General) Regulation 2022 conditions.
10	June 2023	Cindy McDonald	Updated hyperlinks to internal MI procedures and MI contact details. Checked and amended notifiable authorities contacts table in plan and response guide. Included emergency assembly map for lake paddock.

#### **Document authorisation**

	Name	Position	Date
Endorsed by:	Jim Hocking	Environmental Planning Manager	30 June 2023
Approved by:	Jody Rudd	General Manager – Assets Delivery	30 June 2023

#### ©Murrumbidgee Irrigation Limited (MI)

The document contains material which is the proprietary information of MI. No part of this document may be reproduced or distributed without prior permission of MI. Unauthorised use of this document in any form whatsoever is prohibited.



# **Contents**

1	Purp	ose	1
2	Legis	lative requirements	1
	2.1	MI's EPL	1
	2.2	Definitions	2
	2.2.1	Pollution incident	2
	2.2.2	Material harm to the environment	2
	2.2.3	Report 'immediately'	2
3	Scop	e	2
4	Resp	onsibilities	2
5	Com	munication	3
6	Actio	ns to be taken to manage a pollution incident	5
7	Minir	nising harm to persons on the premises	5
8	Pollu	tion hazards, risks and controls	6
9	Inver	tory of potential pollutants at the premises	7
10	Incid	ent response training	7
11	Revi	ew and testing	7
ΑF	PEND	X 1 Pollution Incident Response Guide	8
ΑF	PEND	X 2 Hanwood Business Centre Emergency Plan	9
ΑF	PEND	X 3 Hanwood Depot Emergency Plan	10
ΑF	PEND	X 4 Leeton Office and Depot Emergency Plan	11
ΑF	PEND	X 5 Leeton Lake Paddock Emergency Plan	12



### 1 Purpose

Murrumbidgee Irrigation (MI) has developed this Pollution Incident Response Management Plan (PIRMP) to comply with the legislative requirements of the *Protection of the Environment Operations Act 1997* (POEO Act).

The purpose of this PIRMP is to:

- Outline protocols to ensure timely communication regarding a potential or actual pollution incident is provided to MI staff, Environmental Protection Authority (EPA) and other relevant authorities as specified in the POEO Act, including relevant local Councils, NSW Health, SafeWork NSW, Fire and Rescue NSW and persons outside the operations who may be affected by the impacts of a pollution event
- Identify key risks of pollution incidents and planned actions to minimise and manage those risks
- Outline implementation requirements for appropriate staff, and setting the framework for testing and reviewing the plan for accuracy, currency and suitability

This plan is to be used in conjunction with MI's Incident Management and Reporting Procedure.

All MI plans are available to staff on Magiq and via MI's intranet links. This plan will also be published on MI's website: Water quality | Murrumbidgee Irrigation (mirrigation.com.au).

### 2 Legislative requirements

The specific requirements for a PIRMP are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2022. In summary, this provision requires the following:

- All holders of an Environment Protection Licence (EPL) must prepare a PIRMP (section 153A, POEO Act)
- 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 71)
- Licensees must keep the plan at the premises to which the EPL relates (section 153D, POEO Act)
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 75)
- If a pollution incident occurs during an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act)

#### 2.1 MI's EPL

MI holds an Environmental Protection Licence for which this PIRMP applies. Details are:

Name of licensee: Murrumbidgee Irrigation Limited

(including ABN) ABN 39 084 943 037

EPL number: 4651

Premises name and address: Murrumbidgee Irrigation Area & Districts

Main Office:

86 Research Station Road Hanwood NSW 2680

Company contact details:

**Business hours** 02 6962 0200

**After hours** See Table 1 for emergency contacts

Emailinfo@mirrigation.com.auWebsite address:www.mirrigation.com.auScheduled activity on EPL:Irrigated agriculture

Fee-based activity on EPL: Irrigated agriculture >100,000 hectares



#### 2.2 Definitions

The following definitions apply to this plan.

#### 2.2.1 Pollution incident

A pollution incident is defined as:

"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'.

#### 2.2.2 Material harm to the environment

Material harm to the environment is defined under 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.

#### 2.2.3 Report 'immediately'

MI is 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.

### 3 Scope

MI's PIRMP is activated in the event of a pollution incident where it is determined that there is a risk of material harm to the environment. This includes pollution incidents that occur on land and water ways under the ownership or management of MI.

For all incidents involving Asbestos, please refer to MI's Asbestos Management Guide.

This PIRMP must be followed by all employees, contractors and visitors to assist in the early response to and reporting of a pollution incident. This applies to all premises and worksites, unless controlled by a contractor.

In the event of a pollution incident occurring on a site controlled by an MI contractor, the response to that pollution incident is managed in accordance to the contractor's incident management procedures. However, MI must be notified of the incident immediately.

# 4 Responsibilities

The PIRMP identifies the general responsibilities of MI staff during a pollution incident. The Incident Manager is responsible for ensuring the following is completed, where required.

- Managing the response to any pollution incident as required in this plan
- Administration, maintenance and implementation of the PIRMP
- Reporting of significant environmental incidents as required in this plan
- Regulatory, community and customer communication
- Registration of complaints and pollution incidents
- Internal incident investigating and reporting, as per MI's Incident Management Procedure



#### 5 Communication

MI employees are the first point of contact for the notification of a pollution incident on MI premises in accordance with MI's Incident Management & Reporting Procedure.

The relevant authorities will be contacted by designated MI employees and any further instructions from these authorities will be adhered to as required. All pollution incidents are to be reported to an MI staff member via the phone numbers listed in Table 1 immediately.

**Table 1. Murrumbidgee Irrigation contact details** 

Murrumbidgee Irrigation – General	Phone
Front office Business hours and Emergency 24-hour service	(02) 6962 0200

If an incident presents an immediate threat to human health and/or property **call '000'**. Also **call '000'** if the incident cannot be handled with available resources or is unsafe to respond to.

After becoming aware of a pollution incident which causes or threatens to cause material harm to the environment (refer Section 2.2.2), the pollution incident must be verbally reported immediately to the relevant authorities listed in Table 2.

External notification will depend on type of incident. Communication to authorities is the responsibility of the Incident Manager. The information required to be provided to authorities include:

- 1. The time, date, and location of the incident
- 2. The nature, estimated quantity or volume and the concentration of any pollutants involved, if known
- 3. The circumstances in which the incident occurred, including the cause, if known
- 4. The action taken or proposed to be taken to contain and reduce the impact of the pollution incident

Ongoing updates of the incident may be requested by the relevant authorities. If the incident poses no actual or potential harm to human health and safety and would not result in actual loss or damage to property or the environment, then management must be notified and no further notification to the authorities listed in Table 2 is required.



Table 2. Contact details for notifiable authorities as required under POEO Act

Authority	Contact number	After hours emergency		
To respond to a chemical or fuel spill Fire and Rescue NSW – ask for HAZCHEM Police NSW – if public safety or crime involved Ambulance – if injuries or shock involved.	000 – Respond to incident	000		
To report a pollution incident that has the potential to cause material harm to the environment EnviroLine	131 555	131 555		
If a pollution incident has the potential to cause risk to human and public health Albury Public Health Unit Murrumbidgee and Southern NSW LHD	(02) 6053 4800	(02) 6053 4800 Albury Base Hospital - ask for Public Health Officer on call		
If a pollution incident has the potential to cause risk to River operations Water NSW	1800 061 069	1800 061 069		
If pollution has or is likely to require State Road closure/ impacts Transport for NSW	131 700	131 700		
If pollution has or is likely to require Rail closure/impacts Australian Rail Track Corporation (ARTC)	1300 550 402	1300 550 402		
If a pollution incident requires notification for workplace health and safety reasons SafeWork NSW	131 050	131 050		
If a pollution incident has occurred above the point of raw water town supply and/or If a pollution incident has occurred resulted from negligent action				
Griffith City Council	1300 176 077	Water & Sewer - 6962 8105		
Leeton Shire Council	(02) 6953 0911	(02) 6953 0911		
Carrathool Council	(02) 6965 1900	0407 244 429 (Roads) Water & Sewer Goolgowi - 0429 690 010 Water & Sewer Hillston - 0429 672 119 Water & Sewer Rankins Springs - 0428 661 305		
Narrandera Shire Council	(02) 6959 5510	0417 023 015 (Sewer & Water) 0427 595 562 (Roads, Parks and other)		
To report a pollution incident where Fire and Rescue were not the first point of notification Fire and Rescue NSW	1300 729 579	1300 729 579		



Communication with the local community or customers may be required depending on the circumstances of the pollution incident. MI would consider the following options for providing information to the community on pollution incidents:

- Phone contact, SMS or face to face communication with residents and/or customers affected
- Information posted on MI website homepage
- The inclusion of information in local newspaper
- Seek assistance from the local Council to communicate with residents

Refer to MI's Incident Management & Reporting Procedure further details.

### 6 Actions to be taken to manage a pollution incident

The following actions may be taken to manage a pollution incident. Risk assessments will be undertaken prior to undertaking any action, to ensure the safety of personnel, bystanders and nearby local communities:

#### 1. Stop pollution source

If safe to do so, stop the pollution continuing, e.g. via emergency isolation / stop valves, crimping hoses, plugging leak source, reorientating polluting tank/ vessel.

#### 2. Contain pollution source

If safe to do so, contain the pollution source in as small an area as possible to keep it from spreading and/or direct it away from sensitive receivers.

#### 3. <u>Isolate polluted waters</u>

If a pollution incident occurs in the irrigation system, regulating and outlet structures will be utilised to isolate the water and to reduce the risk of this water reaching farmland or other waterways. If in smaller drainage lines, earthen bunds may be used if equipment is available.

#### 4. Contact relevant stakeholders and authorities

Contact affected customers, residents, council or authority.

#### 5. Clean up of any contaminated area

In the event of a chemical spill, the local HAZMAT unit is available for the cleanup of and possible containment of the chemical. In the event soil has been contaminated by a severe spill, the soil will be removed and disposed of at a licenced disposal site in accordance with application legislative requirements.

# 7 Minimising harm to persons on the premises

All MI employees handling and applying chemicals hold a ChemCert III accreditation (AQF3). Staff responsible for handling and spraying chemicals will ensure that the appropriate PPE is available and used by themselves and others carrying out this activity. MI's <u>Hazardous Chemicals Procedure</u> and relevant SWMSs details additional management measures.

All visitors to MI's offices and depots will be notified of evacuation procedures and evacuation points in the event of an emergency. Fire Assembly Area maps below for Hanwood and Leeton premises, are available on MI's Intranet, noticeboards and Magiq:

- Fire Assembly Map Hanwood Depot
- Fire Assembly Map Hanwood Accommodation
- Fire Assembly Map Hanwood Offices
- Fire Assembly Map Leeton Office and Depot
- Fire Assembly Map Leeton Lake Paddock





Incidents outside of our fixed premises will be managed in accordance with MI procedures and with a view to minimising harm to any staff, bystanders and local community members.

Emergency procedures and notifying site personnel and MI management will be undertaken in accordance with the MI's <a href="Emergency Preparedness Procedure">Emergency Preparedness Procedure</a>, <a href="Safety and Emergency Handbook">Safety and Emergency Handbook</a> and <a href="Incident Management & Reporting Procedure">Incident Management & Reporting Procedure</a>.

# 8 Pollution hazards, risks and controls

Hazards	Risks	Controls	Likelihood	Consequence	Risk Rating
Chemical spill (Internal – MI activities)	<ul> <li>Land and soil contamination</li> <li>Water contamination-potential to prevent water supply to customers</li> <li>Human health (skin irritation, airway damage, poisoning)</li> <li>Impacts to terrestrial and/or aquatic flora and fauna.</li> </ul>	<ul> <li>SDSs available</li> <li>Hard stand chemical mixing stations at Depots for MI activities</li> <li>Onsite storage facility (ventilated, signed etc)</li> <li>Training and induction for chemical spill response</li> <li>Spill response kit/ supplies</li> </ul>	Occasional (3)	Low (2)	Medium (5)
Fuel or oil spill (Internal – MI activities)	<ul> <li>Land and soil contamination</li> <li>Water contamination-potential to prevent water supply to customers</li> <li>Water contamination – environmental impact</li> <li>Human health (skin irritation, airway damage, poisoning)</li> </ul>	<ul> <li>SDSs available</li> <li>Training and induction for fuel spill response including emergency stop activation</li> <li>Bunded areas for refuelling or refuel at service stations.</li> <li>UPSS facility – regular groundwater monitoring. Double-skinned tanks, Fuel System Operation Plan.</li> <li>MI's procedures</li> </ul>	Occasional (3)	Low (2)	Medium (5)
Chemical or fuel spill (external, including chemical spills from vehicle accidents and illegal dumping)	<ul> <li>Land and soil contamination</li> <li>Water contamination- potential to prevent water supply to customers</li> <li>Human health (skin irritation, airway damage, poisoning)</li> </ul>	<ul> <li>Pollution Incident Response Guide (Appendix 1)</li> <li>MI's Safety &amp; Emergency Procedures Handbook</li> <li>Staff training and induction on chemical spill response procedures</li> <li>Escalation to Fire &amp; Rescue for large or dangerous incidents.</li> </ul>	Highly Likely (5)	Medium (3)	High (8)



# 9 Inventory of potential pollutants at the premises

MI maintains a hazardous chemical register for all chemicals used and stored on the premises. All hazardous chemicals used on the premises have a Safety Data Sheet (SDS) available. Hard copies are kept in storage areas, in company vehicles and copies can be accessed from the company database. Table 3 details the bulk hazardous chemicals stored on premises by MI.

Table 3 Bulk hazardous chemicals stored on MI premises

Hazardous chemical	Capacity	Storage location
Diesel fuel	30,000L	Griffith Depot
Petrol	10,000L	Griffith Depot

# 10 Incident response training

MI will provide training and information to relevant employees on the PIRMP and actions required in the event of a pollution incident. This can include both online and practical 'mock' training.

A copy of the pollution incident response guide (APPENDIX 1 Pollution Incident Response Guide) for responding to a pollution incident will be provided as part of the employee induction for Operations staff.

A copy of this document will be readily available to all staff on MI's Intranet, Magiq and website.

### 11 Review and testing

An internal review of this plan is required to be conducted annually. The review will consider all aspects of the PIRMP, including legislation and license changes. All changes are to be documented and staff informed of these changes.

Routine testing of the plan will be conducted annually and occur within one month of an incident that caused or threatened material harm to the environment. Testing can be completed through one of the following methods:

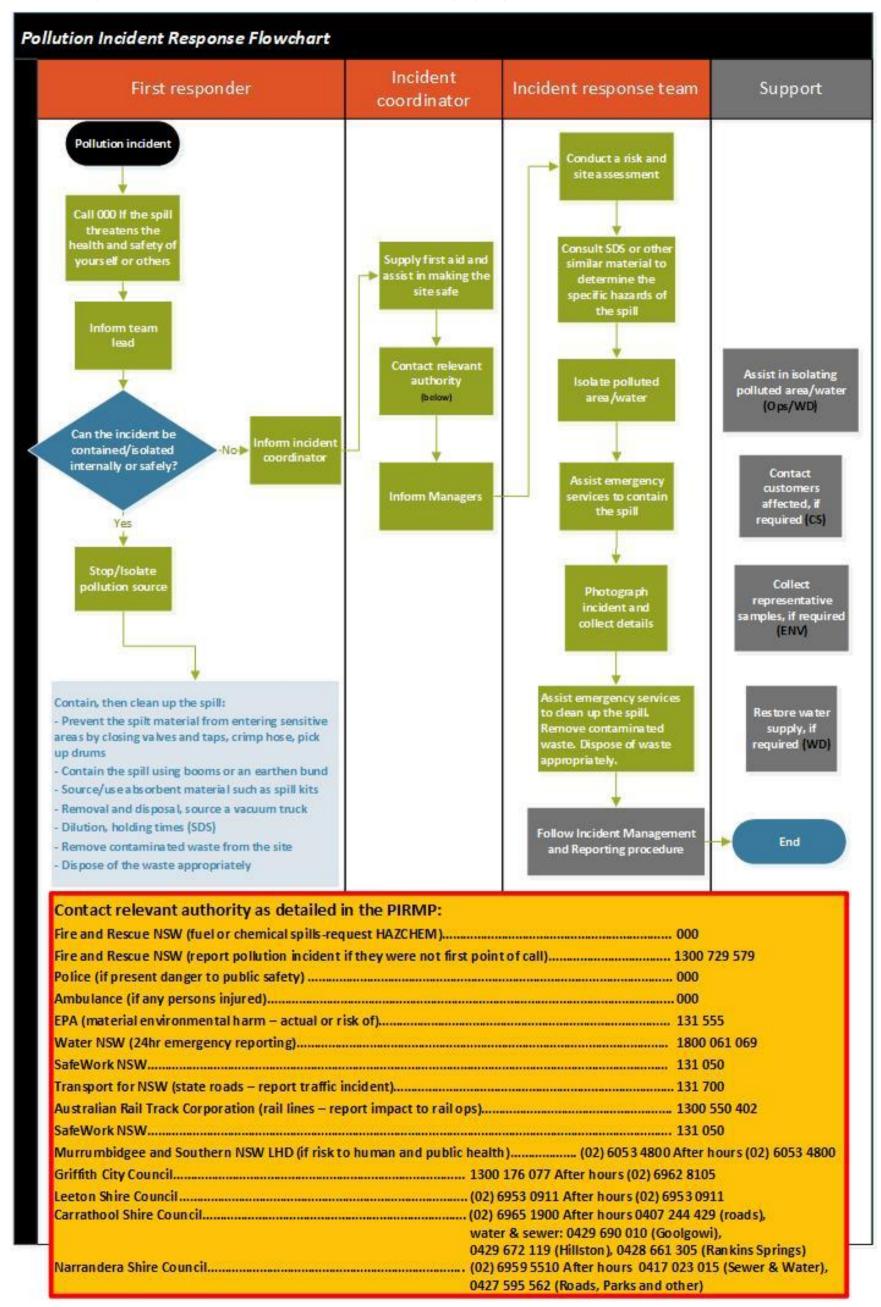
Туре	Record type
Incident response	Beakon data and records, e.g. photos
Preparations for serious forecast weather event	Work orders, internal comms, planning meeting minutes
Training drill	Training / drill record
Simulated pollution incident emergency (mock scenario in field or desktop); MI's spill response training	Training / drill record



### **APPENDIX 1 Pollution Incident Response Guide**

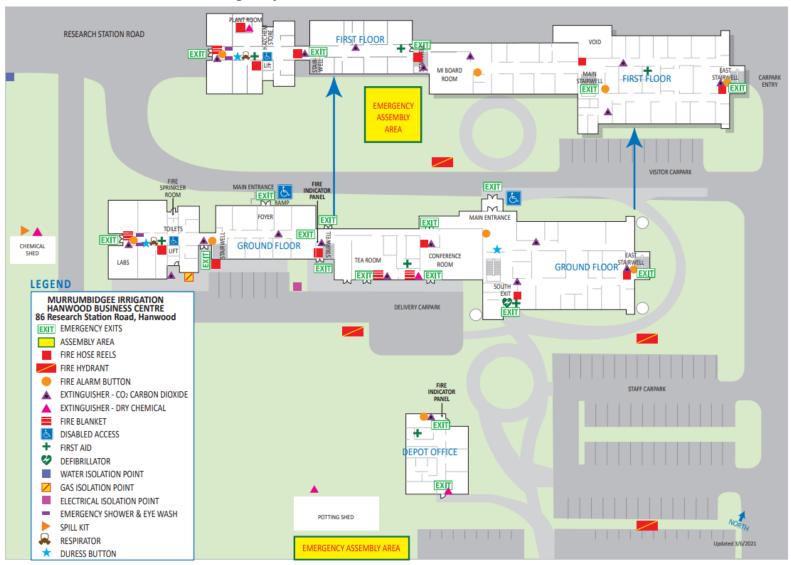
STOP. THINK. ACT. Do not complete task unless safe to do so.

If an incident presents an immediate threat to human health and/or property call 000



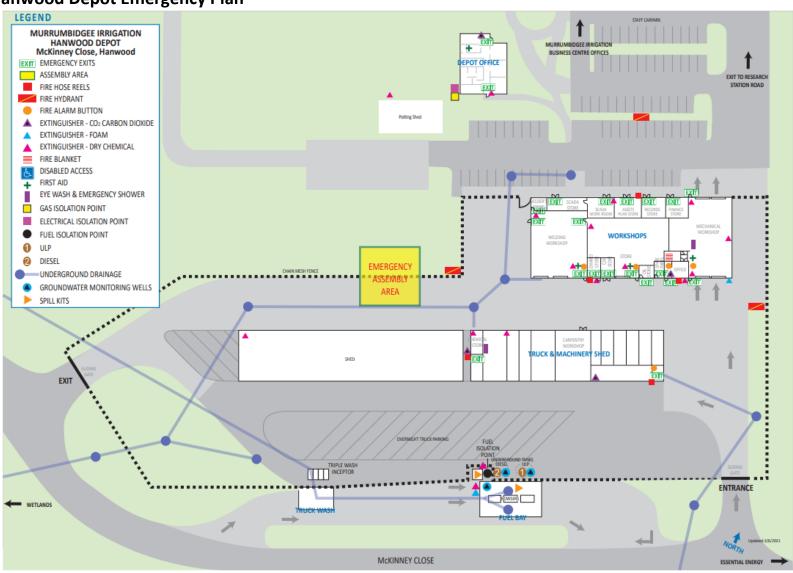


# **APPENDIX 2 Hanwood Business Centre Emergency Plan**



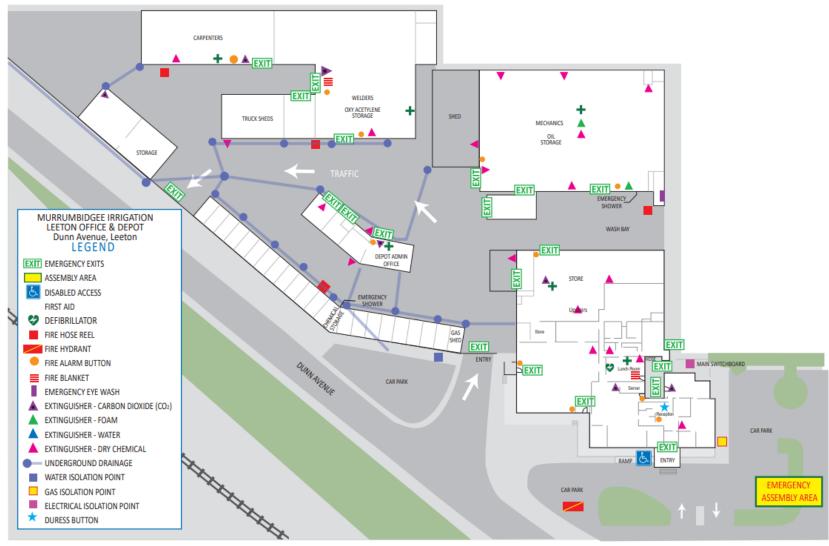


# **APPENDIX 3 Hanwood Depot Emergency Plan**





# **APPENDIX 4 Leeton Office and Depot Emergency Plan**





# **APPENDIX 5 Leeton Lake Paddock Emergency Plan**

