



Murrumbidgee  
Irrigation

**Pollution Incident Response  
Management Plan**

## Document Control

Revision	Date	Reason for review	Nature of amendment	Approved by
01	Aug 2015	New format	Align with legislative requirements	Alan Shea
02	Aug 2016	Annual Review	Include feedback from EPA	Lindsay Golsby-Smith
03	July 2017	Annual Review	Update MI staff contact details	Lindsay Golsby-Smith
04	April 2018	Following pollution incident – External	Clarify response for chemical spill incident and simplify Appendix 1	Lindsay Golsby-Smith
05	Aug 2019	Annual Review	Update MI contact details	Lindsay Golsby-Smith

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## 1. Purpose

This Pollution Incident Response Management Plan (PIRMP) has been written to comply with the legislative requirements of EPL 4651 in accordance with the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009*. The purpose of this PIRMP is to:

- Ensure timely communication regarding a potential or actual pollution incident is provided to MI staff, the Environmental Protection Authority (EPA) and other relevant authorities as specified in the Protection of the Environment Legislation Amendment Act (POELA Act), including Griffith City Council, NSW Ministry of Health, Work Cover NSW, Fire and Rescue NSW and persons outside the operations who may be affected by the impacts of a pollution event
- Minimise and control the risk of a pollution incident at MI's premises by identifying key risks and planned actions to minimise and manage those risks
- Ensure that the plan is implemented by appropriate staff, and ensuring that the plan is regularly tested for accuracy, currency and suitability

**This document is to be used in conjunction with MI's Incident Management Procedure.**

## 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 2009. 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 98B)
- 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 98E)
- 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)

### **3. Definition of “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’, 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.

Murrumbidgee Irrigation 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.

### **4. 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 incident 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 in 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.

## 5. Responsibilities

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

## 6. Communication

MI employees are the first point of contact for the notification of a pollution incident on MI premises. The relevant authorities will be contacted by 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 listed in Table 2 immediately.

Table 1. Murrumbidgee Irrigation contact details

Murrumbidgee Irrigation – General	Phone
FRONT OFFICE (Business Hours)	(02) 6962 0200
EMERGENCY 24 HOUR SERVICE – GRIFFITH	(02) 6962 0262
EMERGENCY 24 HOUR SERVICE – LEETON	(02) 6953 0100

If an incident presents an immediate threat to human health and/or property **call '000'**. After becoming aware of a pollution incident which causes or threatens to cause material harm to the environment, the pollution incident must be verbally reported immediately to the relevant authorities listed in Table 3. 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 3 is required.

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

<b>Authority</b>	<b>Contact number</b>
<i>To respond to a chemical spill</i> Fire and Rescue NSW	Call 000 – Respond to incident 1300 729 579 – for enquiries
<i>To report a pollution incident that has the potential to cause harm to the environment</i> Local EPA EnviroLine	(02) 6969 0700 131 555
<i>If a pollution incident has the potential to cause risk to human and public health</i> Ministry of Health	(02) 4924 3000 (business hours) (02) 4921 3000 (after hours)
<i>If a pollution incident has the potential to cause risk to River operations</i> NSW DPI Water	(02) 4904 2500
<i>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</i> Griffith City Council, Compliance Officer	(02) 6962 8100
<i>As above</i> Leeton Shire Council	(02)6953 0911 0428 268 679 (after hours)
<i>As above</i> Carathool Council	(02) 6965 1900 0407 244 429 (after hours)
<i>As above</i> Narandera Shire Council	(02) 6959 5510 0427 595 562 (after hours)

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

Refer to MI's Incident Management Procedure further details.

## **7. Actions to be taken to manage a pollution incident**

The following actions may be taken to manage a pollution incident:

### 1. Contain pollution source

If safe to do so, contain the pollution source in as small an area as possible to keep it from spreading.

### 2. Isolate polluted waters

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.

### 3. Contact relevant stakeholders and authorities

Contact affected customers, council or authority.

### 4. 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.

## **8. Minimising Harm to Persons on the Premises**

All MI employees handling and applying chemicals hold a ChemCert accreditation. 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. All visitors to MI's offices and depots will be notified of evacuation procedures and evacuation points in the event of an emergency. Site maps and evacuation points can be referred to in Appendix 2 – 4 for Hanwood and Leeton premises.

Emergency procedures and notifying site personnel will be undertaken in accordance with the company's Emergency Procedure Handbook.

## 9. Pollution Hazards, Risks and Controls

Hazards	Risks	Controls	Likelihood	Consequence	Risk Rating
Chemical or fuel spill (Internal – MI activities)	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <li>▪ SDS 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>▪ Bunded areas for fuel storage</li> <li>▪ Chemical storage facilities</li> </ul>	Occasional (3)	Low (2)	Medium (5)
Chemical and fuel spill (external, including chemical spills from vehicle accidents and illegal dumping)	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <li>▪ Pollution Incident Response Guide (Appendix 1)</li> <li>▪ MI's Emergency Procedures Handbook</li> <li>▪ Staff training and induction on chemical spill response procedures</li> </ul>	Highly Likely (5)	Medium (3)	High (8)

## 10. 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 Hazardous chemicals stored on the premises

Hazardous Chemical	Capacity	Storage location
Diesel Fuel	30,000L	Griffith Depot
Petrol	10,000L	Griffith Depot
Acrolien	3,000kg	Lot 2, Dalton Road Murrumbidgee

## 11. Incident Response Training

MI will implement the PIRMP by providing training and information to relevant employees. A copy of the pollution incident response guide (Appendix 1) 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.

## 12. Review and Testing

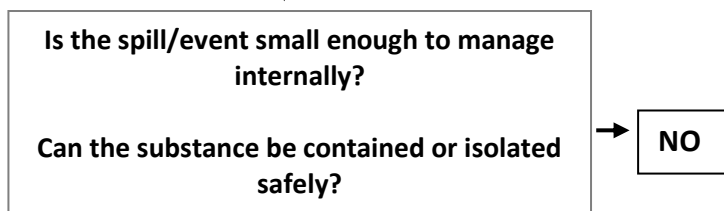
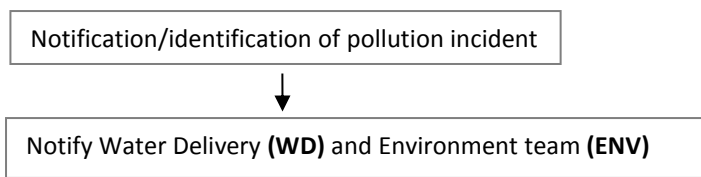
An internal review of this plan is required to be conducted annually and within one month following the activation of the PIRMP. The review will consider all aspects of the PIRMP, including legislation and license changes. All changes are to be documented and staff informed of these changes. Routine testing of the plan will be also conducted annually, and can be completed through the following methods:

- Incident response
- Simulated environmental emergency, or
- Desktop analysis

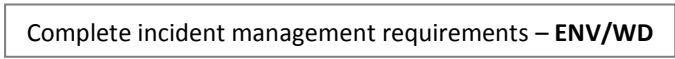
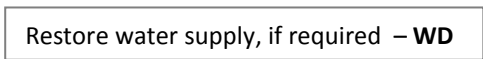
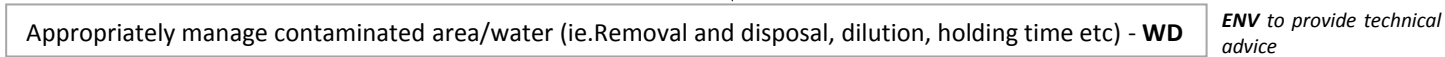
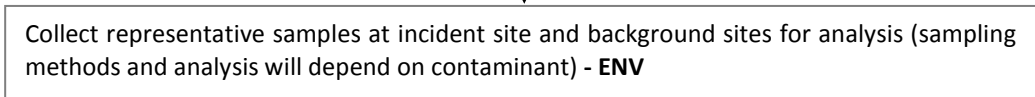
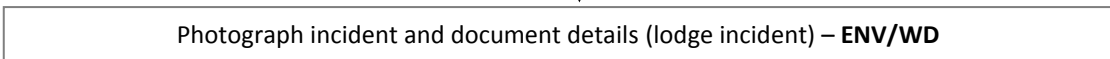
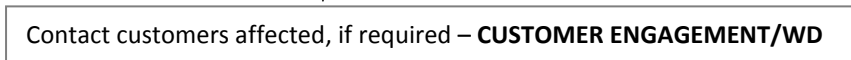
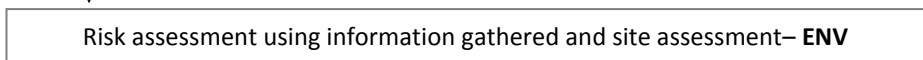
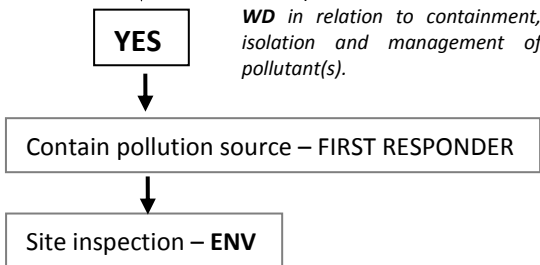
# APPENDIX 1 Pollution Incident Response Guide

**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**



*WR to provide technical advice to WD in relation to containment, isolation and management of pollutant(s).*



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EMERGENCY 24 HOUR SERVICE – LEETON	(02) 6953 0100

## Contact relevant authority as detailed in the PIRMP:

Fire and Rescue NSW (fuel or chemical spills-request HAZCHEM)

Police 000 (if present danger to public safety)

EPA 131 555

Water NSW (24hr emergency reporting) 1800 061 069

Griffith City Council (02) 6362 8100 After hours (02) 6969 4832

Leeton Shire Council (02)6953 0911 After hours 0428 268 679

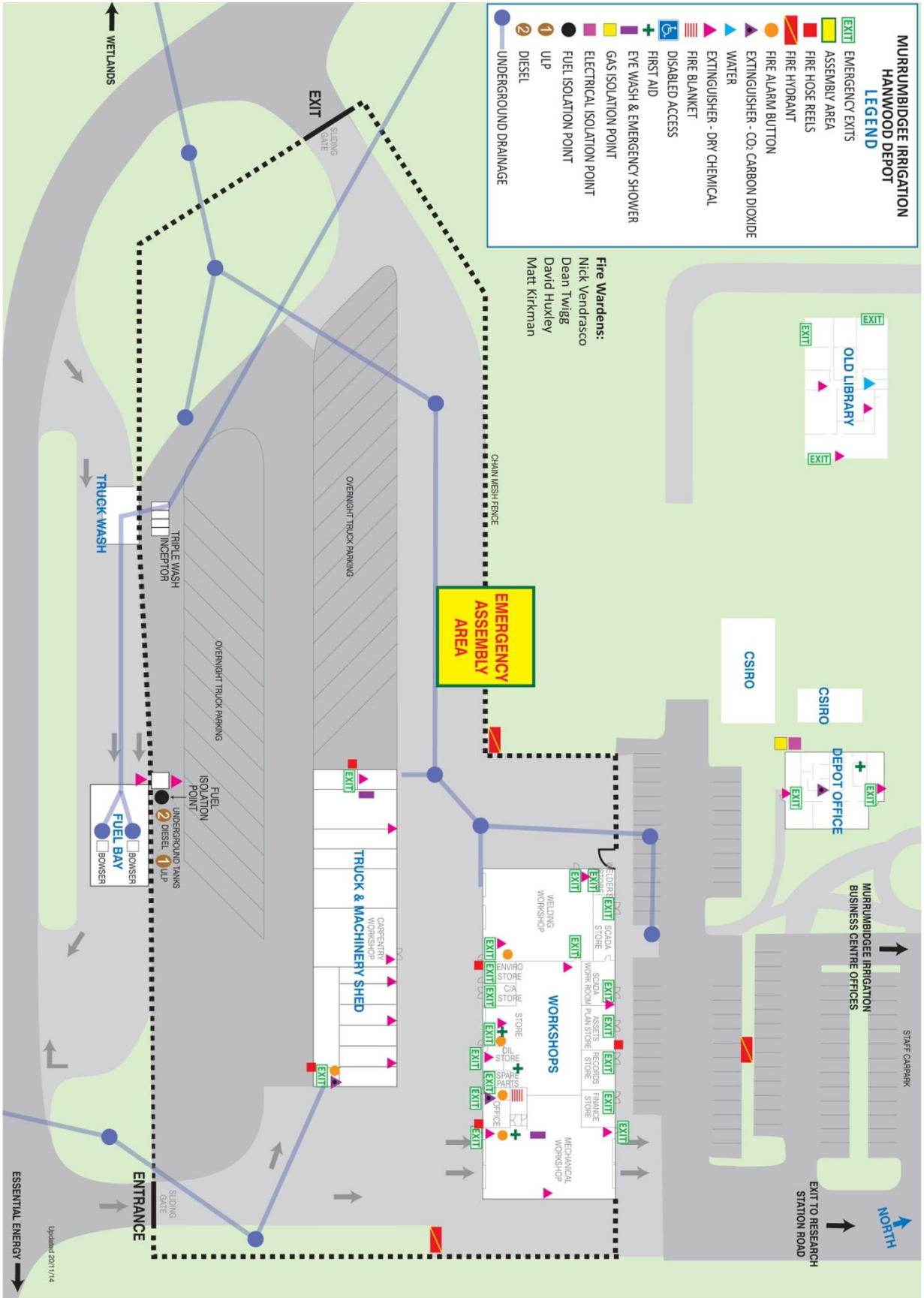
Carathool Shire Council (02)6965 1900 After hours 0407 244 429

Narandera Shire Council (02) 6959 5510 After hours 0427 595 562

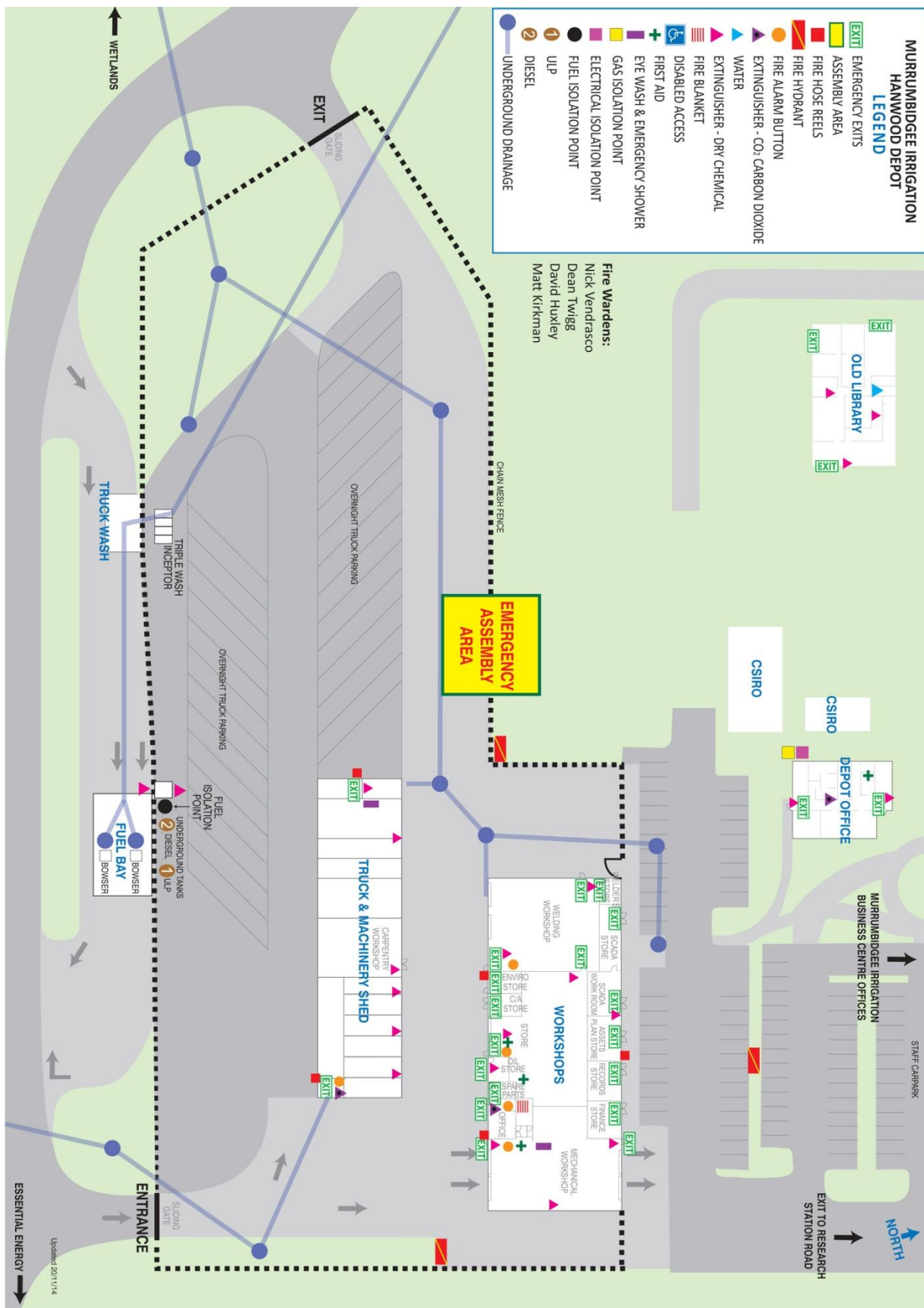
MI to assist by providing information and/or operational assistance – **Water Resources and Irrigation Services**

Contact all affected customers – **Customer Services/Division Operator**

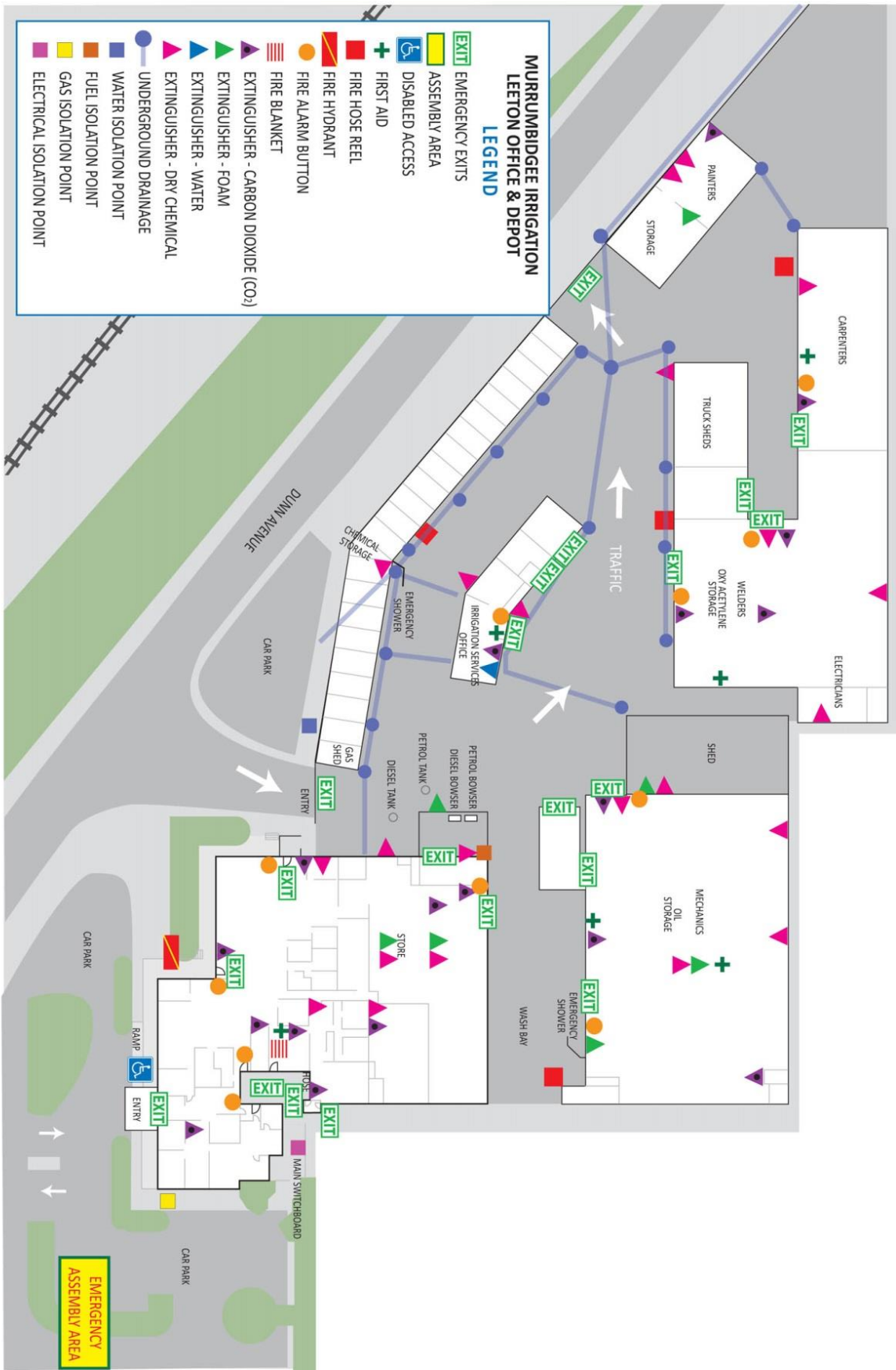
# APPENDIX 2 Hanwood Business Centre Emergency Plan



# APPENDIX 3 Hanwood Depot Emergency Plan



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



Updated 22 July 2015