

Pollution Incident Response Management Plan

Silt and Debris Removal from Waste Water and Stormwater,
Waste Water Environmental Clean-ups, Manhole Conditional Inspection,
Assets and Conditional Assessment (CCTV Pipe Surveying),
Robotics and Localised in Pipe Repair



PLAN

Pollution Incident Response Management Plan

Business Name		Total Drain Cleaning		
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1.0 Introduction

Total Drain Cleaning (TDC) is an Australian owned and operated company that specializes in sewer and storm water, drain and pipe cleaning operations.

Some of the main services provided are:

- Stormwater Pipe Cleaning Jetting/Root cutting with Water Recycling Capabilities
- Tank Cleaning
- SPS Cleaning
- Industrial Vacuum Loading
- High Pressure Water Blasting
- Filter Media Removal and Loading
- SQID Maintenance/Cleaning/Repairs/Inspection Reporting
- Non-Destructive Vacuum Excavation/Trenching/Potholing
- Condition Assessment (CCTV Pipe Surveying)
- Robotics and Localised in Pipe Repair
- 24/7 Emergency Response for Flooding/Environmental Spills

TDC aims for a quality, safety, reliability and value for money. Combined with the latest technology, operator experience and safety equipment TDC can tackle any job. TDC is also able to deliver high standard cleaning services ranging from programmed and periodical maintenance contract services to emergency and response services.

2.0 About this plan

2.1 Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the Protection of the Environment Operations Act 1997 (POEA Act) and associated Protection of the Environment Legislation Amendment Act 2011 (POELA Act) for licensed transport. This document is to be used in conjunction with other TDC systems including the Environment Management System (ISO 14001:2015), Emergency Evacuation, Internal Audit and Crisis Management.

Assess

- What substance is involved?
- What is the danger level of the substance?
- What is the volume of the emission
- Is there risk to health and safety?
- Can you contain the substance without putting you or others in danger?
- Do you have the necessary PPE and equipment to manage the situation?
-

Following your assessment of the situation and if containment is not possible then go straight to

2.2 Objectives

The objectives of this plan are to:

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- Ensure comprehensive and timely communication about a pollution incident from on site staff to, the Environment Protection Authority (EPA), other relevant authorities and community members who may be affected by the impacts of the pollution incident;
- Minimise and control the risk of a pollution incident by requiring identification of risk and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying people responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability
- To provide a guide for the operations, actions and notifications to be carried out in the event a pollution incident occurs -
- To provide clear documentation of pollution risks, communication procedures to authorities and community regarding pollution incidents
- To articulate the testing and training requirements for a pollution response.
- To identify pre-emptive actions to prevent pollution risks

2.3 Key Personnel Contact details

Name: John Dalton
Position or title: CEO
Business hours contact number: 0429170717
After hours contact number: 0429170717
Email: jdalton@totaldraincleaning.com.au

Name: Shawn Turner
Position or title: GM
Business hours contact number: 0478 667 827
After hours contact number: 0478 667 827
Email: shawnt@totaldraincleaning.com.au

Name: Robert Time
Position or title: Project Manager
Business hours contact number: 0402 059 724
After hours contact number: 0402 059 724
Email: rtime@totaldraincleaning.com.au

Name: Emma Bentton
Position or title: SHEQ Manager
Business hours contact number: 0434 856 636
After hours contact number: 0434 856 636
Email: ebentton@totaldraincleaning.com.au

3.0 Description of the likelihoods and hazards

The potential hazards created by TDC cleaning and maintaining assets include

Hazards	Risk	Contributing factor
Explosion / Bushfire	Low	<ul style="list-style-type: none"> Working in high fire danger periods Potential ignition sources include cigarettes and domestic rubbish (such as bottles), and the generation of sparks through pumps heating localised vegetation Fuel leaks and spills from plant, pumps and the storage of fuel and aerosol cans, could also provide a fuel source for bushfires and explosions
Excessive air emission	Moderate	<ul style="list-style-type: none"> Poor operation of vehicle Infrequent vehicle inspection and maintenance regime Poor housekeeping of fuel / chemical storage areas Failure of or inadequate secondary containment (i.e. bunding failure)

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Leak	Low	<ul style="list-style-type: none"> • Hole in tanker • Tanker not closed • Tanker overflowed
Spill or accident with waste water or sewage	Medium	<ul style="list-style-type: none"> • Insufficient sized holding tanks • Infrequent pump outs being undertaken • Drop waste bag • Bag splits
Spills or accidents with hazardous substances and dangerous goods	Low	<ul style="list-style-type: none"> • Poor operation of plant or vehicle • Infrequent plant or vehicle inspection and maintenance regime • Poor housekeeping of fuel / chemical storage areas • Failure of or inadequate secondary containment (i.e. bunding failure) • Not adhering to spill response requirements and Hazardous and Contaminated Materials Management Plan
Vehicle accident	Moderate	<ul style="list-style-type: none"> • Drive to fast • Drive steep incline • Other drivers make error

4.0 Pre-emptive actions

Hazards	Contributing factor
Explosion / Bushfire	<ul style="list-style-type: none"> • General purpose fire extinguishers and fire extinguishers suitable for oil/fuel fires will be available in all offices, plant and vehicles • Personnel on site will be familiar with the use of fire-fighting equipment • Fire-fighting equipment will be maintained regularly • Monitoring of weather or bushfire notifications • Fire detection systems will be in place and regularly inspected with each compound building.
Excessive air emission	<ul style="list-style-type: none"> • Works must cease when high levels of air-borne dust cannot be controlled • Ensure all machinery and vehicles meet relevant emissions standards. Any vehicles or machinery non-compliant with standards or producing excessive (visual assessment) emissions to be disused immediately
Leak	<ul style="list-style-type: none"> • New vehicles • Well maintained vehicles • Maintain vehicle service and daily prestart
Spill or accident with waste water or sewage	<ul style="list-style-type: none"> • Volumes of hazardous substances onsite minimised as far as practicable • Spill kits will be kept in site vehicles • Hazardous and dangerous substances including all fuels, oils, lubricants and chemicals brought onto the worksite will only to be handled or stored within designated bunded areas or other suitable locations to ensure retention of any spills or leaks

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	<ul style="list-style-type: none"> All appropriate Safety Data Sheets will be kept on site and will be readily accessible
Spills or accidents with hazardous substances and dangerous goods	<ul style="list-style-type: none"> All waste would be managed in accordance with the Waste Management Plan Liquid wastes are to be stored in appropriate containers in bunded areas until it can be transported off-site for disposal at a licenced facility Effluent tanks to be fitted with visual and/or audio alarms to prevent tank overflows
Vehicle accident	<ul style="list-style-type: none"> Drive to speed limit Monitor driving Obey road signs Drive to condition

5.0 Inventory of Pollutants

Pollutant	Maximum Quantity
Wet waste max	2000 litres
Dry waste Max	8000 kilograms
WD 40	400 gm
Fuel	10 litres (Jerry can)
Lubricants	1litre
Diesel	In vehicle up to 200l

6.0 Safety equipment and system

Equipment	Location of Equipment
SDS Register	Electronic/Black Folder
Spill Kits	Each vehicle
Fire equipment	Each vehicle
Emergency Evacuation Drills	Annual
Personal Protective Equipment	Gloves, boots, glasses, dust masks, hearing protection, and hi vis clothing
First Aid Kist	Each vehicle

7.0 Notification to relevant authority

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, 1997 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. Material harm to the environment from the pollution incident can be within or outside the Project premises.

7.1 Emergency Contact Numbers

Reporting Agency	Contact Details
Immediate threat	
NSW Fire and Rescue (Emergency)	000
EPA Pollution Hotline	131 500
Safe Work NSW	131 050
Not an immediate threat	
NSW Fire and Rescue	1300 729 579
EPA – Pollution Hotline	131 500
Sydney Water	132 290
RMS	137 788
Department of Planning and Environment	compliance@planning.nsw.gov.au
Energy Australia	131 388
Gas – AGL	131 909
Integral Energy	131 003
NSW State Emergency Services	132 500
Poisons Information Centre	131 126

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Council Name	PHONE
Bayside Council	02 9562 1666
The Hills Shire Council	02 9843 0555
Blacktown City Council	02 9839 6000
Blue Mountains City Council	02 4780 5000
Burwood Council	02 9911 9911
Camden Council	02 4654 7777
Campbelltown City Council	02 4645 4000
City of Canada Bay Council	02 9911 6555
Canterbury Bankstown Council	9707 9000
Fairfield City Council	02 9725 0222
Georges River Council	02 9330 6400
The Council of the Shire of Hornsby	02 9847 6666
The Council of the Municipality of Hunters Hill	02 9879 9400
Inner West Council	02 9392 5000
Lane Cove Municipal Council	02 9911 3555
Liverpool City Council	1300 362 170
Liverpool Plains Shire Council	02 6746 1755
Mosman Municipal Council	02 9978 4000
North Sydney Council	02 9936 8100
Northern Beaches Council	1300 434 434
City of Parramatta Council	1300 617 058
Penrith City Council	02 4732 7777
Randwick City Council	1300 722 542
Richmond Valley Council	02 6660 0300
Council of the City of Ryde	02 9952 8222
Strathfield Municipal Council	02 9748 9999
Sutherland Shire Council	02 9710 0333

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Council Name	PHONE
Council of the City of Sydney	02 9265 9333
Waverley Council	02 9083 8000
Willoughby City Council	02 9777 1000
Wollongong City Council	02 4227 7111
Woollahra Municipal Council	02 9391 7000

7.2 Information to be Notified

The notification of a pollution incident to site supervisors is the responsibility of all site and contractor personnel. Site Supervisors / Managers will notify authorities and provide relevant information. It is important to provide the relevant information about a pollution incident when notifying. Section 150 of the POEO Act requires the following information to be given:

- The time, date, nature and duration and location of the incident
- The location of the place where pollution is occurring or is likely to occur
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- The circumstances in which the incident occurred (including the cause of the incident, if known)
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- Other information prescribed by the regulations.

Details to be recorded when making each notification include the date and time of each call and a unique reference number, which will provide a confirmation that the requirements have been completed.

The above information is to be initially communicated verbally to each relevant authority and is to be followed by written notification to EPA within 7 days of the date on which the incident occurred. The nature, cause and proposed action of a pollution incident may not be known to the person, who initially notified the incident. Under the POEO Act, the information must be immediately notified to that person once it becomes known.

This is to ensure that regular contact is made with all authorities and persons who have been notified of the incident, in relation to ongoing actions taken to combat the pollution caused by the incident. In particular, these personnel will:

- Liaise with the EPA regarding appropriate actions to be taken to control, manage and mitigate the pollution
- Work co-operatively with the EPA and any other relevant authorities to clean-up any pollution
- Notify the community of the results of ongoing monitoring of the pollution
- Consult any owners or occupiers in the vicinity of the site regarding any off-site actions to be taken which may impact on their properties.

8.0 Communication with people

8.1 Emergency Warden

Emergency wardens are assigned the responsibility to coordinate and facilitate the initial response to an emergency incident until the Emergency Coordinator or attending emergency service arrive. The driver if able to will assume this role until the Emergency Coordinator or attending emergency service arrive.

They are responsible for:

- assessing the situation
- Isolate /secure the incident
- Notify emergency services
- Communicate with other near by
- Control movement around the site
- Use spill kit and contain spill

9.0 Actions to be taken

9.1 Emergency Coordinator

Emergency Coordinator or attending emergency service will act as the Emergency Coordinator and has the following responsibilities

- Direct Emergency Response Team for the duration of the incident clean up
- Direct traffic
- Assist with clean up spill

9.2 Incident and Response

The Pollution Incident Response is to assess, contain, notify and clean up.

Contain

- Can you stop the source of the spill / emission?
- Utilise barriers (absorbent booms, banks of soil or any other safe objects) or spill absorbent to prevent the spill / emission from spreading.
- Use the appropriate absorbent materials, i.e. granules, dust or sand.
- The main priority is to prevent the spill / emission from getting off site.

Notify

- Raise the alarm, contact the nearest emergency warden and or emergency coordinator.
- Evacuate the site personnel to the site emergency assembly points.
- Notify surrounding businesses and evacuate if necessary.
- The EC / EW will contact the relevant authorities; – Firstly 000, if the incident warrants 000 the following will also be notified
 - EPA
 - The Local Council
 - Ministry of Health through the local Public Health Unit
 - SafeWork NSW

Clean up

- Once the situation is under control clean up and remedial actions to restore the environment.
- Disposal of pollutants in accordance with regulations.

10.0 Review and Improvement of the PIRMP

Continual improvement of this plan will be achieved by the annual evaluation of the implementation of the PIRMP, evaluation of environmental incidents and the testing of this plan.

The continual improvement process will be designed to:

- identify areas of opportunity for improvement of pollution incident which leads to improved environmental performance
- determine the root cause or causes of non-conformances and deficiencies
- develop and implement a plan of corrective and preventative action to address nonconformances and deficiencies
- verify the effectiveness of the corrective and preventative actions
- document any changes in procedures resulting from process improvement; and
- make comparisons with objectives and targets.

Testing of this plan is required to be undertaken, as a minimum, once every 12 months. Testing is to be carried out in such a manner as to ensure that the information in this plan is relevant, up to date, and that the plan is capable of being implemented in a workable and effective manner.

The plan will be similarly reviewed within one calendar month of having been implemented and after an unplanned significant incident.

11.0 Staff training

All employees and contractors working on site will undergo site induction training relating to waste management. Drivers induction will include

- Awareness of the PIRMP
- Location and availability of the plan
- Pollution incident classification and reporting
- Spill response actions
- Other incident response actions
- Early warnings internally and to neighbours where appropriate
- Specific procedures in dealing with potentially pollution incidents.

Training will also include Toolbox Talks and Prestart Meetings in which the topics of the site induction will be revisited.

12.0 Availability of this document

This will be available on TDC Shared directory.

13.0 Test of the plan

Testing of this PIRMP will be coordinated by the environmental manager to ensure the information is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner.

Test results and corrective actions will be submitted for review.

Testing includes all components of the plan, including training requirements. The POEO (General) Regulation 2009 states that the testing must be performed routinely at least once every 12 months and within 1 month of any pollution incident.

A detailed recording of the testing of the plan will be prepared after each testing undertaken. The dates of testing, the name of members who conducted or participated in the testing must be included (Appendix A).

Appendix 1 Emergency Assessment

Project Name		Date	
Job No#		Site Supervisor	
Address			

Evacuation Sequence	Time	
	Hours	Minutes
Incident		
Emergency Coordinator respond		
Emergency Coordinator check area		
Emergency Coordinator check surrounding areas		
Evacuation commenced		
Clear the area		
Persons with disabilities accounted for		
Arrive at assembly area, safe place		
Warden check personnel present (where appropriate)		
Evacuation completed		
Exercise terminated		
Comments		
Observer		
Signature		Date