



Pollution Incident Response Management Plan

Clyde Terminal

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Part A

Background

This Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with the requirements set out in Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2022.

Objectives of PIRMP

The objectives of these plans are to:

- Ensure comprehensive and timely communication about a pollution incident to Viva Energy employees at the Clyde Terminal, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Health, SafeWork NSW and Fire and Rescue NSW) and people outside the facility who may be affected by the impact 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.

Information to be included in the PIRMP

The PIRMP includes the information contained in section 153C of the POEO Act and the details prescribed by Chapter 4 of the POEO (General) Regulation 2022.

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.

Implementation

If a pollution incident occurs in the course of an activity such that material harm to the environment is caused or threatened, Viva Energy will immediately implement the PIRMP.

PIRMP testing and review

The testing of this plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and the plan is capable of being implemented in a workable and effective manner.

Any such test is to be carried out:

- a) Routinely at least once every 12 months, and
- b) The PIRMP is to be reviewed within one month of any pollution incident occurring.

Contact details of the relevant Authorities to be notified of a pollution incident

Pollution Incident Notification Requirements - Duty to report a pollution incident causing or threatening material harm to the environment.

CLYDE - Environment Protection Licence No. 570			
Order to Call ²	Government Authority	Contact	Contact Number
1	EPA ¹	EPA Environment Hotline	131 555
2	NSW Health	Westmead Hospital (Public Health Unit) - daytime (ask for an Environmental Health Officer)	(02) 9840 3603 (switchboard) (02) 9840 3708
		Westmead Hospital (Public Health Unit) - after hours (ask to page the Public Health Officer)	(02) 9845 5555
3	SafeWork NSW	24-hour contact number	13 10 50 (pick Option 1)
4	Parramatta City Council	Parramatta City Council (Environmental Health Team Leader)	(02) 9806 5425
5	NSW Fire and Rescue ²	Zone office Metropolitan West 2-Parramatta number	(02) 9895 4600 (During BH) 000 in an emergency
6	Other necessary agency	Sydney Ports Corporation	(02) 9296 4999

¹Note: For overflows (with visible oil), please call EPA only.

²Except in an emergency and NSW Fire and Rescue 000 is called first.

Emergency Response

The Clyde Terminal has an Emergency Response Plan (ERP) that has been developed in conjunction with Fire and Rescue NSW as the designated combat agency. The Clyde Terminal has an on-site alarm and when activated, there is an automatic call-out to them.

Contact Details of the local community to be notified in the event of a pollution incident

Emergency management within residential locations is controlled by the Combat Agency (Fire and Rescue NSW and/or NSW Police). Therefore, community communication will take place via the Combat Agency in the event of a significant incident.

Part B

Additional matters to be included in the PIRMP

The matters to be included in the PIRMP required under section 153C (d) of the POEO Act and Section 72 of the POEO (General) Regulation 2022 are as follows:

Clyde Terminal		
Clause	Requirement	Details / Documentation
98C (1)	The matters required under section 153C (d) of the Act to be included in a plan are as follows:	
98C (1) (a)	A description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),	Site Wide Hazard and Effects Register Clyde and Gore Bay (HEMP Register)
98C (1) (b)	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	Site Wide Hazard and Effects Register Clyde and Gore Bay (HEMP Register)
98C (1) (c)	Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,	Site Wide Hazard and Effects Register Clyde and Gore Bay (HEMP Register) - Bowties, Health Risk Assessments
98C (1) (d)	An inventory of potential pollutants on the premises or used in carrying out the relevant activity,	The Dangerous Goods Manifest is included in our Emergency Services information Pack (Copy at Gatehouse and Movements Control Room)
98C (1) (e)	The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,	The Dangerous Goods Manifest is included in our Emergency Services information Pack (Copy at Gatehouse and Movements Control Room)
98C (1) (f)	A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,	<p>The Clyde terminal has various controls in place to minimise the risk to human health and the environment from its operation and control pollution events</p> <p>These include but not limited to</p> <ul style="list-style-type: none"> • Pipeline High Pressure alarms and trips • Pump High Temp and Low Flow trips • Tank Level Indication (both Primary and Independent) including SIL rated trips • Emergency Shutdown trips • Manual Call Points that initiate site wide trip and automated call-out to Fire and Rescue NSW • Tank and Pump Heat detection that initiate foam deployment and call-out to Fire and Rescue NSW • Hydrocarbon Gas detectors

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Clause	Requirement	Details / Documentation
		<p>These controls and more are detailed in the Clyde Safety Case Summary and Emergency Response Documents Chapter 4 Fire Protection manual.</p> <p>This is included in our Emergency Services information Pack (Copy at Gatehouse and Movements Control Room)</p> <p>Facility PPE requirements</p> <p>Permit To Work System</p>
98C (1) (g)	The names, positions and 24-hour contact details of those key individuals who:	<p>The Clyde Terminal ERP Volume 2 Contacts List – SC-OPS-ER08-0002-PL details all relevant Viva Energy Contacts in addition to Emergency Services, Utilities/Suppliers, neighbours and regulatory authorities.</p> <p>This is included in our Emergency Services information Pack (Copy at Gatehouse and Movements Control Room)</p>
i	Are responsible for activating the plan, and	<p>Personnel who can activate the Emergency Response Plan (ERP) are:</p> <p>Viva Energy Terminal Manager – Trent Youlten on 0420 946 872 / (02) 9897 8221 or</p> <p>Terminal Controller on 02 9897 8603, 0408 127 367 or 02 9897 8603.</p>
ii	Are authorised to notify relevant authorities under section 148 of the Act, and	Terminal Controller on 02 9897 8603 or 0408 127 367
iii	Are responsible for managing the response to a pollution incident,	Clyde Terminal ERP Volume 2 Contacts List – SC-OPS-ER08-0002-PL
98C (1) (h)	The contact details of each relevant authority referred to in section 148 of the Act,	The Clyde Terminal ERP Volume 2 Contacts List refers to document HS-MAS-0002-GD – Incident Notification Requirements Guide Supply Chain NSW. This document details all regulatory authority contacts and is included in our Emergency Services information Pack (Copy at Gatehouse and Movements Control Room)
98C (1) (i)	Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,	<p>Emergency management within residential locations is controlled by the Combat Agency (Fire and Rescue NSW and/or NSW Police).</p> <p>Early warnings and regular updates to owners and occupiers in the vicinity of the Clyde Terminal are undertaken in accordance with the NSW SafeWork requirements for Major Hazard Facilities. This community communication is undertaken via the Combat Agency in the event of a significant incident.</p> <p>The Combat Agency will notify and inform affected neighbours of any actions required to be taken, as well as any potential disruptions such as road closures.</p>
98C (1) (j)	The arrangements for minimising the risk of harm to any persons who are on the premises or who are present	<ul style="list-style-type: none"> • Site Induction • Emergency Response Plan (ERP) • Health Risk Assessments • Permit to Work System <ul style="list-style-type: none"> ◦ HS-SAF-0010-MA - Permit to Work System Manual • PPE Procedure

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Clause	Requirement	Details / Documentation
	where the scheduled activity is being carried on,	<ul style="list-style-type: none"> ○ HS-SAF-0003-ST - PPE Standard
98C (1) (k)	A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any storm water drains on the premises,	<p>Emergency Response Plan Volume 4 Fire Protection Manual contains maps with an overview of location of pollutants onsite and detailed drawings of the storm water drains on the premises.</p> <p>Drawings are included in our Emergency Services information Pack (copy at Gatehouse and Movements Control Room)</p>
98C (1) (l)	A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,	The Emergency Response Plan (ERP) provides these details
98C (1) (m)	The nature and objectives of any staff training program in relation to the plan,	<p>Personnel undergo formal emergency response training on a three year cycle, managed through the Learning Management System process.</p> <p>Emergency response personnel take part in at least one exercise annually.</p> <p>Records of participation in emergency exercises is documented in MYOSH¹.</p> <p>These details are documented in the ERP Volume 3 Management Document.</p>
98C (1) (n)	The dates on which the plan has been tested and the name of the person who carried out the test.	<p>The Emergency Response Plan is tested quarterly.</p> <p>Exercises are scheduled, conducted and reported in MYOSH.</p> <p>Trent Youlten (Clyde and Parramatta Terminal Manager) is responsible for the completion of these tests. The dates that the plan was last tested is detailed in our annual return to the EPA.</p>
98C (1) (o)	The dates on which the plan is updated.	Refer to the cover sheet of relevant Emergency Response Plan documents for review and version history.
98C (1) (p)	The manner in which the plan is to be tested and maintained.	<p>The Emergency Response Plan (ERP) is tested via desktop and field exercises in accordance with an annual program that is recorded in MYOSH.</p> <p>The ERP is maintained in the Controlled Document Management System (CDMS) and is reviewed every two years as a minimum. The document is also reviewed following an incident requiring activation of this plan.</p> <p>A document review may also be initiated following: legislation changes, changes in organisational structure, emergency response training exercises and/or recommendations from audits.</p>

¹ MYOSH is Viva Energy's web based incident management system.