

Appendix 1: Pollution Incident Response Management Plan (PIRMP)

Pollution Incident Response Management Plan

CCC holds an Environmental Protection Licence (EPL 3200) with the NSW EPA for the dredging program as it involves discharge of dredge spoil to waters. All EPL's require the licensee to prepare a

Pollution Incident Response Management Plan (PIRMP) which must be activated if a pollution incident occurs at the premises that causes or threatens material harm to the environment. The content required for all PIRMPs is outlined in Clause 131(1) of the *Protection of the Environment Operations (General) Regulation 2021* and is detailed in the Plan below.



Cease works, make the site safe and contain any pollutants



Report all environmental incidents to the Environment Hotline on 4350 5789



Notify all potentially affected persons in the vicinity

A copy of EPL 3200 is located on the EPA website.

https://app.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=3200&id=3200&option=licence&searchrange=licence&range=POEO%20li_cence&prp=no&status=Issued

The publicly available version of this PIRMP is located on CCC's website.

<https://www.centralcoast.nsw.gov.au/environment/environmental-programs/environmental-management>

Hazards and Pre-emptive Actions

- a)** A description of the hazards to human health or the environment associated with the activity to which the licence relates
- b)** The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,
- 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

Table A: Hazards and Pre-emptive actions

a) Potential hazard	b) Likelihood of hazard (Almost certain, likely, possible, unlikely, rare)	c) Pre-emptive actions
<p>Water pollution – pH</p> <p>May be caused by disposal of dredge spoil if acidic sediments are not managed appropriately</p>	<p>Unlikely if controls are implemented</p>	<ul style="list-style-type: none"> • Water quality monitoring • Frequent inspections of discharge • Licenced discharge limits • Dewatering procedure (sediment curtains, bunded area) • Site induction for staff
<p>Water pollution - Total Suspended Solids</p> <p>May be caused by disposal of dredge spoil if dewatering procedures are not implemented</p>	<p>Unlikely if controls are implemented but could be more likely if background water quality is highly turbid due to weather or other conditions in the catchment</p>	<ul style="list-style-type: none"> • Water quality monitoring • Frequent inspections of discharge • Licenced discharge limits • Dewatering procedure (sediment curtains, bunded area) • Site induction for staff • Refer to EPL3200 Condition L2.7 for special conditions when background water quality is highly turbid
<p>Water pollution – oils and fuels</p> <p>Spills may occur from machinery and equipment</p>	<p>Unlikely if machinery and equipment checks and inspections are undertaken</p>	<ul style="list-style-type: none"> • Machinery and equipment checks and inspections • Refuelling of plant and machinery to only occur in site compound area in Karagi Carpark • Site induction for staff

<p>Smoke, fumes and odours</p> <p>May be generated by machinery and equipment</p>	<p>Rare if machinery and equipment checks and inspections are undertaken</p>	<ul style="list-style-type: none"> • Machinery and equipment checks and inspections • Site induction for staff • Training of staff operating machinery and equipment
<p>Offensive noise</p> <p>May be generated by machinery and equipment</p>	<p>Unlikely if approved hours of operation are adhered to</p>	<ul style="list-style-type: none"> • Machinery and equipment checks and inspections • Operate during approved hours only (no public holidays or nights) • Limit noise near Little Tern colony
<p>Fire</p> <p>Could occur in the site compound or on machinery and equipment</p>	<p>Rare if machinery and equipment checks and inspections are undertaken</p>	<ul style="list-style-type: none"> • Machinery and equipment checks and inspections • Site induction for staff • Training of staff operating machinery and equipment
<p>Harm to threatened species could occur if dredging activities disturb Little Terns or other birds from nesting</p>	<p>Unlikely if works are timed to avoid Little Tern settlement in the area.</p>	<ul style="list-style-type: none"> • Timing of works • Fencing of Little Tern area • Regular inspections and monitoring of Little Terns • Site induction for staff

Inventory of Pollutants

- d)** an inventory of potential pollutants on the premises or used in carrying out the relevant activity
- 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

- Machinery Oil – 300L
- Hydraulic Fluid – 300L
- Diesel Fuel – 1000L
- Unleaded Petrol – 1000L
- Dredge spoil discharge (estuary water mixed with natural sediments) – 100,000L

Safety Equipment

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

- Life jackets on all boats
- Fire extinguishers in large plant/machinery
- Fire extinguisher in site office
- Spill kit in site office
- Spill kit on all boats
- Spill kit available for large/plant machinery
- Radios for communication between personnel
- Water quality monitoring equipment – hand held multi-meter and sample jars
- Where deemed necessary floating sediment booms around dredge spoil disposal area
- Fencing around site compound
- Security cameras around site compound

Contact Details

- g)** the names, positions and 24-hour contact details of those key individuals who: are responsible for activating the plan, and are authorised to notify relevant authorities under section 148 of the Act, and are responsible for managing the response to a pollution incident,
- h)** the contact details of each relevant authority referred to in section 148 of the Act,

Table B: Contact Details for Managing the Response to a Pollution Incident

CCC Environmental Hotline	4350 5789 (24 hours)	Central point for all environmental incident reporting in CCC. Undertakes notification to other agencies in the event of a notifiable incident.
James Lawson – Section Manager Environmental Infrastructure	0478 323 695 (business hours) James.Lawson@centralcoast.nsw.gov.au	Responsibility – to be updated each dredge campaign
Matt Barnett – Team Leader Environmental Infrastructure Catchments	0400 685 438 (business hours) Matthew.Barnett@centralcoast.nsw.gov.au	Responsibility – to be updated each dredge campaign
Mitchell Anderson – Technical Officer Environmental Infrastructure	0437 489 142 (business hours) Mitch.Anderson@centralcoast.nsw.gov.au	Responsibility – to be updated each dredge campaign
Colleen Birch – Environmental Management Coordinator	4325 8865 - (business hours) Colleen.Birch@centralcoast.nsw.gov.au	Assisting with incident response and reporting. Undertaking incident investigation.
Contractor Foreman - to be updated each dredge campaign	Contact - to be updated each dredge campaign	Responsibility – to be updated each dredge campaign
Council Project Manager – to be updated each dredge campaign	Contact - to be updated each dredge campaign	Responsibility – to be updated each dredge campaign
WHS site inspector - to be updated each dredge campaign	Contact - to be updated each dredge campaign	Responsibility – to be updated each dredge campaign
NSW Environment Protection Authority	131 555 (24 hours)	Authority requiring notification under POEO Act
SafeWork NSW	131 050 (24 hours)	
Fire and Rescue	9469 3111 (24 hours) 9469 3111 (24 hours)	
NSW Health – Local Area District Central Coast Council customer service switch	4320 9730 (business hours) 4320 2111 (after hours, ask for public health nurse)	

Notifying People in the Vicinity

- 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,

The premises of the EPL is the Entrance Channel and surrounding foreshore, with the site compound generally being located in Karagi Carpark. Dredging machinery and equipment may operate anywhere within this locality. Discharge of dredge spoil is undertaken within a designated area that is set up each season, generally close to Karagi Carpark on the northern side of the channel.

Surrounding the compound area is a caravan park to the north-west, vegetated reserve to the south and residential dwellings to the north-east. The southern side of the Entrance Channel is a public precinct containing shops, restaurants and parks. The Entrance Channel is utilised by the public for fishing, boating and swimming.

Early warnings and updates to the above stakeholders is provided via the following:

- The public are notified of the works via CCC's social media, website and other media avenues.
- Signage and (electronic billboard) is displayed to notify the public before closure of Karagi Carpark for use as the site compound.
- Signage and site fencing is installed around the site compound.
- Phone numbers are displayed on site signage.
- Verbal consultation with the Boat Shed.
- Verbal consultation with the Caravan Park.

Minimising Risk of Harm to Persons on Site and Reducing Risks of Harm to Human Health

- j)** the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on
- 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 evacuation muster point is within the site compound unless the emergency is within the site compound and then the muster point will be at the entry to the compound on Hutton Road.
- Users of the waterway will be kept out of any area where an incident occurs via a support boat that can patrol the area, if required contact marine rescue or Transport for New South Wales Maritime for assistance.
- The site compound is secured with fencing and all staff and visitors are required to sign in.
- The site compound is locked outside working hours.
- Daily pre-works site inspections are undertaken by Compliance officer and/or Site Supervisor in relation to both WHS and EMP.
- Daily safety inspections and risk assessment, tool box talks are undertaken by all personnel on site when and who.
- Other inspections/checks.
- Fire extinguishers and spill kits are available on site.
- Personnel on the water and shore communicate regularly via radio
- In the event of any pollution incidents, the stakeholders above will be contacted.
- All directions will be followed from relevant agencies such as the EPA and Hazmat.

Maps

- 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 stormwater drains on the premises.



Figure 1: Location of potential pollutants, safety equipment and drains



Figure 2: Premises to which EPL3200 relates and surrounding area

Training, Testing and Updating the PIRMP

- m)** the nature and objectives of any staff training program in relation to the plan
- n)** the dates on which the plan has been tested and the name of the person who carried out the test,
- o)** the dates on which the plan is updated,
- p)** the manner in which the plan is to be tested and maintained

The PIRMP is tested annually during the pre-works induction meeting where all personnel are trained in the environmental controls for the program. This includes the EPL and PIRMP, details from the Review of Environmental Factors and Fisheries Permit. The PIRMP test involves a hypothetical incident drill and questioning personnel on response actions.

The PIRMP is reviewed annually prior to the dredging season by CCC's Environmental Reporting Team in consultation with CCC's Dredge Working Group. The PIRMP is not reviewed in years where no dredging occurs.

Table C: Training, testing and updating dates

PIRMP training test and updating dates		Person who carried out test
2020	PIRMP preparation 29/8/2020	Hunter Wharf and Barge (dredging contractor)
2020	PIRMP Test November 2020	Section Manager Environmental Infrastructure
2021	No dredging undertaken, EPL not implemented	
2022	PIRMP was re-written 06/2022 and tested via this full review	Environmental Management Coordinator
2023	No dredging undertaken, EPL not implemented	
2024	No Dredging, EPL Not implemented PIRMP test performed January 2024, PIRMP updated	Environmental Management Coordinator