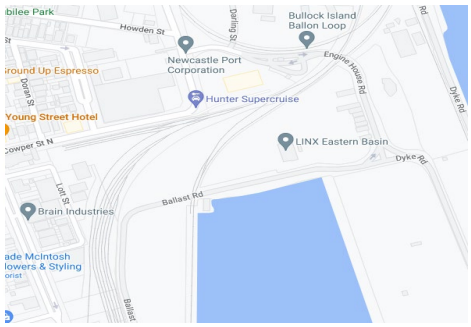
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

Site		Eastern Basin
Business Unit		LINX Port Services
Date Prepared		12 August 2024
Prepared by	Name	Cory Page
	Role	Heath, Safety and Environment Manager- Newcastle

Environment Protection Licence (EPL) details

EPL DETAILS		
Name of Licensee & ABN	Eastern Basin PTY LTD -ABN 86 083 102 890	
EPL Number	20484	
Site name	Eastern Basin	
Site Address	1 Cowper St North, Carrington NSW 2294 (off Bourke St)	
GPS Coordinates	Port Of Newcastle Carrington NSW 2294 Latitude -32.91609° Longitude 151.76959° 	
Company Contact Details	**Name**	Darren Pozniak
	Position/title	Business Manager - Stevedoring & Eastern Basin Distribution Centre
	Contact Number *business hours*	0418 656 326
	Contact Number *after hours*	0418 656 326
	Email	D.Pozniak@linxcc.com.au
Website	https://linxcc.com.au/about/documentation/	

This page and only the sections indicated with a * are to be included in the published version of the PIRMP online (notifications section only).

EPL activities

EPL ACTIVITIES	
Scheduled activities on the EPL	Shipping in Bulk
Fee-based activities on the EPL	Shipping in Bulk 0-100000T annual capacity
Site Background	Eastern Basin Distribution Centre (EBDC) is a LINX run port facility operating out of premises leased from the Port of Newcastle. The facility is located inside the Port of Newcastle bulk precinct at Carrington and has a wharf apron comprised of two berths known as East Basin 1 Berth (EB1) and East Basin 2 Berth (EB2). LINX conduct stevedoring operations at the site including loading and discharge of break-bulk products such as steel coils, long products slab/bar/rod, and plate from vessels for import/export Additionally, break bulk products are stored in undercover or hard stand areas adjacent to the berths at EBDC, this includes the storing of products received by heavy vehicles and rail operations in preparation for loading or following the discharge of vessels during stevedoring operations. Products received may also be out loaded to heavy vehicles for delivery to customers There is an administration complex and container storage yard within the leased area adjacent to an operational rail siding. The site conducts servicing and repairs for mobile plant through service contractor Crown Forklifts. Mobile plant is refuelled on site via self-bunded 4000L storage tank/dispenser which is filled by mobile diesel tanker as required. LINX requires an Environment Protection Licence (EPL) for its bulk products operations (capacity-shipping in bulk 0-100000T). The EPL set outs several criteria that must be followed to adhere to the NSW EPA & the Environment Operations Act 1997 (criteria outlined in Site HSEMP obligations).

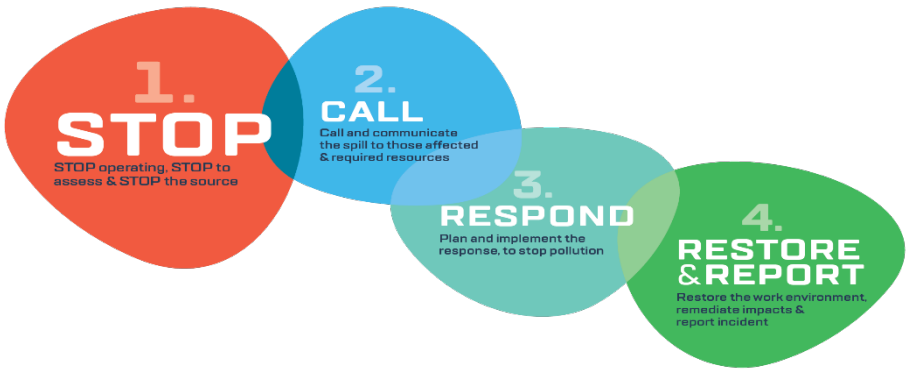
Contact information

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

POLLUTION INCIDENT		
Person(s) responsible		
PIRMP activation	**Name**	Darren Pozniak
	Position/title	Business Manager - Stevedoring & Eastern Basin Distribution Centre
	Contact Number *business hours*	0418 656 326
	Contact Number *after hours*	0418 656 326
	Email	D.Pozniak@linxcc.com.au
Notifying relevant authorities *Notification should be made by a person with an appropriate level of authority within the company.*	**Primary Notifier**	Darren Pozniak (as above)
	Secondary Notifier/ support	
	Name	Cory Page
	Position/title	Heath, Safety and Environment Manager- Newcastle
	Contact Number *business hours*	0409 740 290
	Contact Number *after hours*	0409 740 290
	Email	c.page@linxcc.com.au
Managing response to pollution incident	**Name**	Darren Pozniak
	Position/title	Business Manager - Stevedoring & Eastern Basin
	Contact Number *business hours*	0418 656 326
	Contact Number	0418 656 326
	Email	D.Pozniak@linxcc.com.au

Notifications

The following procedures must be followed for coordinating with the authorities and persons who are to be notified in response to a spill:

NOTIFICATIONS PROCESSES AND PROCEDURES*		
Activity	**Description**	**Responsibility**
Assess severity	**What** **How** **How much** **Where it's going ect**	First responder to refer to Spill Severity Assessment Tool (SSAT) ***Note appendix 1.***
If emergency	**ISS First Response 1300 131 001** Emergency contact for external spills response where there is risk of environmental harm - ISS can mobilise resources including an emergency response coordinator, vac truck, street sweeper, pressure washing, confined space access for drainage, scheduled waste disposal etc.	Authorisation from Site Manager for activation must be confirmed before engagement.
If not emergency	**First responder** 	
Business Manager to consult HSE considering the notification threshold	Incidents which may meet pollution incident reporting threshold: "Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm 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	Business Manager - Stevedoring & Eastern Basin

Activity	Description	Responsibility
	measures to prevent, mitigate or make good harm to the environment."	
PIRMP activated	Decision made to activate PIRMP based on incident details and threshold – internal notifications and external to proceed.	Business Manager - Stevedoring & Eastern Basin
Internal Notifications initiated	Internal notifications as per Incident Management Program	Business Manager - Stevedoring & Eastern Basin
Notification process initiated	Confirm that Notification has to EPA. Obtain details of notification for record.	HSE Manager Newcastle
Incident Management recording notification occurred.	Lifeguard incident record to confirm notification records (date, time and EPA notification reference).	Business Manager - Stevedoring & Eastern Basin

The following people and authorities must be notified accordingly:

NOTIFICATIONS		
State authorities		
Fire & Rescue NSW / Rural Fire Service	000	
NSW EPA	131 555	
NSW Health	NSW Ministry of Health	02 9391 9000
SafeWork NSW	131 050	
Local authority		
Identify the local authority for the area in which the premises to which the environment protection licence relates, and any area, is affected, or potentially affected, by the pollution.		
Port of Newcastle	Port wide incident reporting 49293890	
Other		
Any other identified organisation or agency requiring notification (if applicable) e.g. Water NSW, Department of Planning Industry and Environment, Roads and Maritime Services		
Local Council Area	02 4974 2000	
Neighbours and the local community		
Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes). Record how they will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert).		
Newcastle Stevedores	0418 496 468	

NOTIFICATIONS	
Phone Call, initial advice/warning as determined via impact. Regular updates as determine as required.	
GrainCorp	02 4961 8100
Phone Call, initial advice/warning as determined via impact. Regular updates as determine as required.	
Aurizon	02 4962 1666
Phone Call, initial advice/warning as determined via impact. Regular updates as determine as required.	
Svitzer	02 4920 2200
Phone Call, initial advice/warning as determined via impact. Regular updates as determine as required.	
National Agri Terminal	02 4962 4006
Phone Call, initial advice/warning as determined via impact. Regular updates as determine as required.	
Commercial Metals Company	02 4927 6966
Phone Call, initial advice/warning as determined via impact. Regular updates as determine as required.	
Port Of Newcastle Gatehouse	02 4061 6856
Phone Call, initial advice/warning as determined via impact. Regular updates as determine as required.	

Hazards

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates. Identify the likelihood the hazard occurring, including details of any conditions or events that could, or would, increase that likelihood.

Activity	Hazard	Factors affecting likelihood
Stevedoring & Warehousing	Air Quality	Photochemical smog is an important air quality issue in the metropolitan regions. Ground level ozone (largely resulting from motor vehicle emissions) is the major constituent of photochemical smog which can have adverse effects on human health, vegetation and building materials. Diesel fumes contribute to brown haze and reduced visibility. Impacts of dust (coarse particles) are generally local and more in terms of nuisance such as damage to or soiling of materials, or adverse effects on sensitive vegetation through surface coating. However, contaminated dust (e.g., lead) can cause adverse health effects.
		Stormwater run-off carries loose soil particles from disturbed soil surface (soil erosion) into the receiving surface waters

Activity	Hazard	Factors affecting likelihood
Stevedoring & Warehousing	Surface WaterQuality	and causes turbidity which can reduce light penetration and limit plant growth, fish movement and the ability of predatory fish and birds to see their prey. It can also restrict fishing and recreational activities. Sediment run-off is also considered to be the most significant contributor to increasing nutrient levels in wet weather conditions. Elevated levels of nutrients (phosphorous and nitrogen) in water often promote excessive growth of algae. Algal blooms reduce light and may release toxic compounds into the water killing aquatic organisms as well as restricting fish migration, fishing andrecreational activities.
Stevedoring & Warehousing	Noise	Noise can affect human health in a number of ways such as annoyance reaction, sleep disturbance, interference with communication and hearing loss.
Stevedoring & Warehousing	Waste	Construction and demolition waste contributes 1.5 million tonnes of waste to landfill each year. Land is a scarce natural resource andlandfills are expensive to establish and maintain. Furthermore, there are a lot of political issues attached in siting landfills, especially in large cities, as no one wants a landfill in their backyard. Hence, landfill space should be used sparingly. Landfillscan adversely impact on the quality of soil and groundwater as wellas greenhouse effect through emission of methane gas.
Stevedoring & Warehousing	Energy Use	Australians are dependent on fossil fuels for their major source of energy. The world's fossil fuel reserves are limited and are considered to be non-renewable and scarce. The combustion of fossil fuels generates carbon dioxide, which is a greenhouse gas. The emission of greenhouse gases from power stations increases the greenhouse gas concentration in the atmosphere which in turn adds to the greenhouse effect and can potentially cause climate change/global warming.

Definition of 'Pollution Incident'

The definition of 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.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

Pre-emptive actions

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises.

Event	Risk	Pre-emptive actions (Operations Manager or delegate)
Water Pollution	**Emission to water** • Surface contaminants existing on site may be carried into the stormwater system via runoff. Typical contaminants may include sediment and traces of oil and grease, bulk products (fertiliser)	• Fuel storage tank self-bunded and fuel area located away from escape routes(drains). • Designated wash bays only as per PoN otherwise other means of clean down undertaken (air /brush) • Absorbent materials are kept on site for use in the event of product spills. minor spillage cleaned up with shovels / small bins • Road Sweeper regularly used to minimise dust • Regular auditing / inspections • Regular equipment maintenance • Application of emergency response plan & PIRMP for large spills
Air Pollution	**Exhaust emissions from operational fleet** Operational equipment including trucks, forklifts, front end loaders etc. The vehicles are assumed to comply with emission restrictions when purchased or assembled. Any maintenance work on	• All machinery, vehicles and equipment used on site is compliant to the manufacturer's specifications. The manufacturing process is carried out to relevant standards and procedures, hence excessive pollution emissions are managed. • Regular equipment maintenance to OEM standards. • Plant and equipment shutdown when not required for use.

Event	Risk	Pre-emptive actions (Operations Manager or delegate)
	the vehicles is carried out in accordance with manufacturer's instructions.	• Minimise unnecessary movement of machinery on-site
	Fire Events Examples of the primary area of concern regarding a fire event are: • Refuelling of operational machinery • Cargo storage - containerised and or Bulk cargo • Mobile equipment • Fire aboard a vessel • Building infrastructure	• All machinery, vehicles and equipment used on site is compliant to the manufacturer's specifications. The manufacturing process is carried out to relevant standards and procedures, hence excessive pollution emissions are managed. • Regular equipment maintenance to OEM standards. • Plant and equipment shutdown when not required for use. • The storage of products and materials are done so in a way that takes into consideration fire prevention/minimisation. • A variety of firefighting equipment is readily accessible on-site. The type and location of this equipment is specified in the Site Emergency response plan. Rapid containment and extinguishing of fires prevent air pollution events. • Fire Hydrants, Fire hoses and extinguishers are situated at various locations and on LINX mobile equipment on site. • Vessel firefighting equipment • The environmental risks from a fire event are minimised through the procedures adopted in the Site Emergency Response Plan • Equipment Fires-the possibility of electrical system malfunction may lead to localised equipment fires. All mobile equipment items are fitted with Fire extinguishers and air pollution from these events is seen as minimal and rare.
	Dust Emission during load/unload of bulk products (fertilisers)	• Trained and competent plant operators and truck drivers • Presentation of bulk cargo in state to minimise emissions • Loading procedures to minimise dust and noise emissions • Dust emissions are to be monitored at regular intervals through visual assessment. • Dust suppression is to be used should dust emissions rise to a level where product contamination or off-site transfer of particles may occur to an unacceptable level. • Site Traffic Management Plan to be complied with at all times.
Noise Pollution	**Noise Emission** • Mobile Plant Operation • Material Handling	• Plant and equipment shutdown when not required for use. • Regular equipment maintenance • Trained and competent operators • Presentation of bulk cargo in state to minimise noise emissions • Loading procedures to minimise noise emissions • Timbers & rubbers mats used as glutting to reduce steel on steel impacts

Event	Risk	Pre-emptive actions (Operations Manager or delegate)
		• Steel operations planned where possible to optimise noisy products during daylight hours (hollow sections) LINX's operations generally do not cause significant noise emissions off-site. In order to assure that any surrounding community continues to be protected from any possible event of disturbances from noise emissions, noise complaints will be documented and investigated.
Land Pollution	**Land Contamination** • Cleaning mobile plant and equipment • Oil/fuel onto the ground • Spillage of bulk products • Tracking- drag out onto roadways during bulk operations	• Storage areas are predominately capped (hardstand) to prevent product to loss to land. • Gravel hardstand watered to reduce dust • In the event of spills of any product onto the ground surface, absorbent materials and soak pads are available in the spill kits. • Road Sweeper regularly sweeping roadways, as required • Regular auditing / inspection
Waste	**Waste Steams** • general garbage • recyclable waste • industrial waste • quarantine waste Waste produced on site is disposed of in a lawful and sanitary manner, which is harmless to the environment.	• Procedures for the collection, segregation, storage and disposal of different types of wastes generated on site are designed to be efficient and conform to environmental legislation. • Quarantine Waste is managed by a licensed quarantine waste contractor. This contractor is under contract to ensure disposal of this waste is compliant with AQIS requirements. • General Garbage- office and other solid waste collected in garbage bins is stored in large dump bins around the site until collected by a licensed waste contractor. This organisation is under contract to dispose of this waste in an approved fashion. • Recyclable Waste-Metal, Timber, tyres, paper batteries and oily waste is collected at designated locations on site and recycled by licensed waste contractors. • Hazardous/Industrial Waste from plant and equipment maintenance runs though oily water separator and collected by a licenced waste contractor. • Site mobile plant clean out facilities to be established and maintained as required. • Record though purchase order the types and amountsof waste removed from site. i.e. recycled waste, waste sent to landfill, etc.
Flora & Fauna	Tree preservation/ Weed Management	• The Business Unit Manager or the Site Manager must approve the removal of any trees fromthe site. • All noxious and other weeds to be removed through use of a suitable pesticide. • Plans must be implemented whereby endangered flora or fauna exist on site
Energy Use	Diesel used for heavymachinery and equipment used on site	• Monitor fuel usage and types of machinery used. • Minimise the unnecessary movement of heavy machinery on-site. • Minimise machinery idling time. • Site lighting to be turned off whilst not required/in

Event	Risk	Pre-emptive actions (Operations Manager or delegate)
		use.

Inventory of pollutants

Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates. Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at/on the premises to which the licence relates.

Location/tank	Contents	Max quantity held	Comments
Diesel Tank	Diesel – Combustible Liquid	4800L	Above ground /self-bunded tank
Consumable storage	Oils and Fluids – IBC and drum storage	Approx. 5x20 L drums	Maintenance shed

Safety Equipment

Describe the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident.

ON-SITE *including mobile plant/equipment*	
Equipment/Resource	Description, Location etc
Communications equipment	Portable UHF radios
Fire Extinguishers/Hose Reels	Located throughout site as per emergency plan (throughout distribution shed and EBDC Yard)
Bunded storage	Bunded diesel tank on eastern side of distribution shed.
Spills kit	Spills Kit containing absorbent materials, tools, PPE as per spec, maintained and located throughout site as per emergency plan (Diesel Tank and EBDC Yard)
Drain covers	Drain covers to suit stormwater drains stored in spill bin at diesel tank
Mobile Plant	Mobile Equipment to allow bulk material movement, located thought EBDC Yard

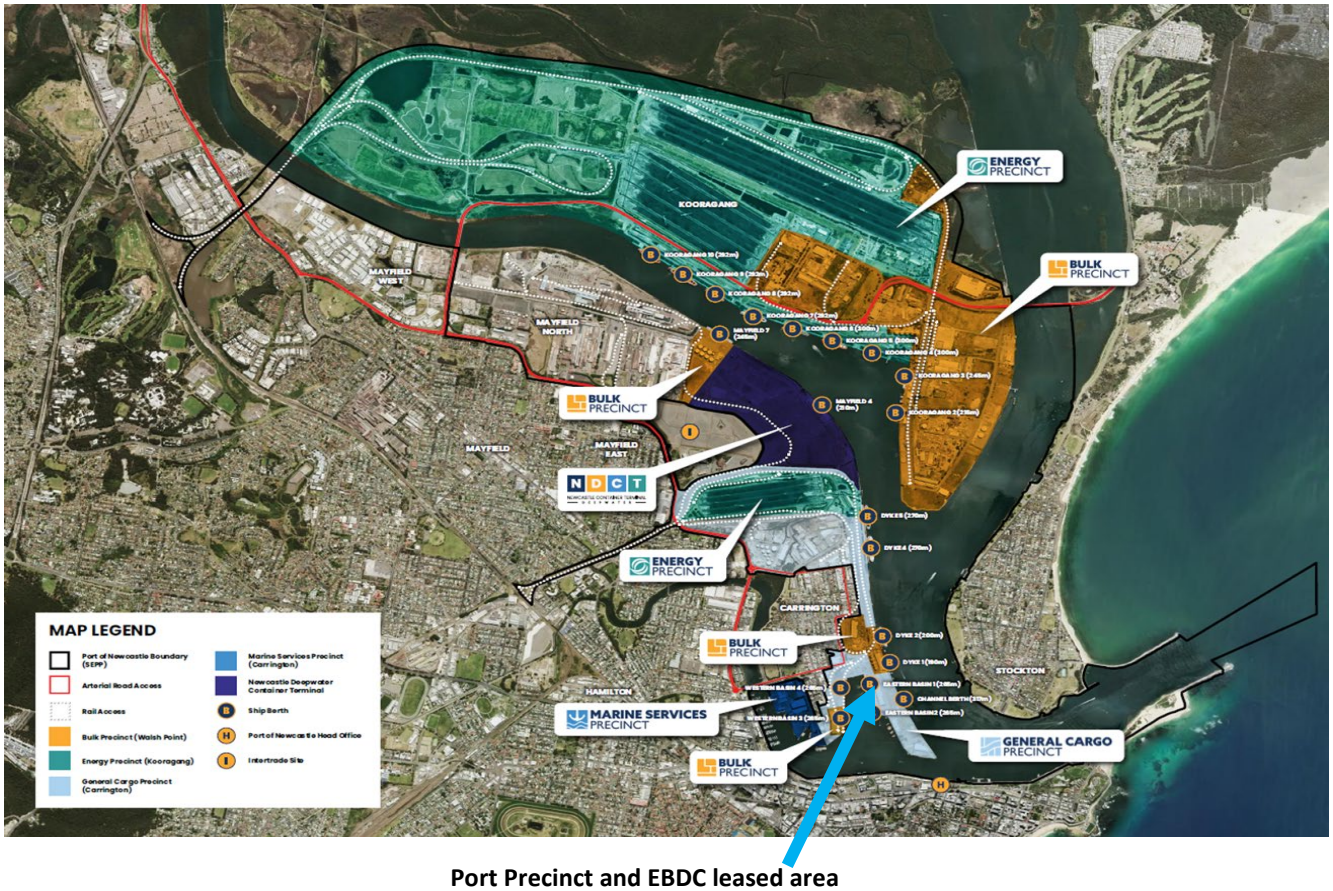
MOBILE *including company workshop equipment*	
Equipment/Resource	Description, Location etc
Mobile Spill response Trailer	Kooragang Island (have light vehicles available to tow) *Trailer containing spill management materials, tools, absorbent materials as per spec*
Industrial sweeper	Access to sweepers through preferred supplier, engaged during activity where there is potential to impact environment

Minimizing harm to persons on the premises

Identify 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 out.

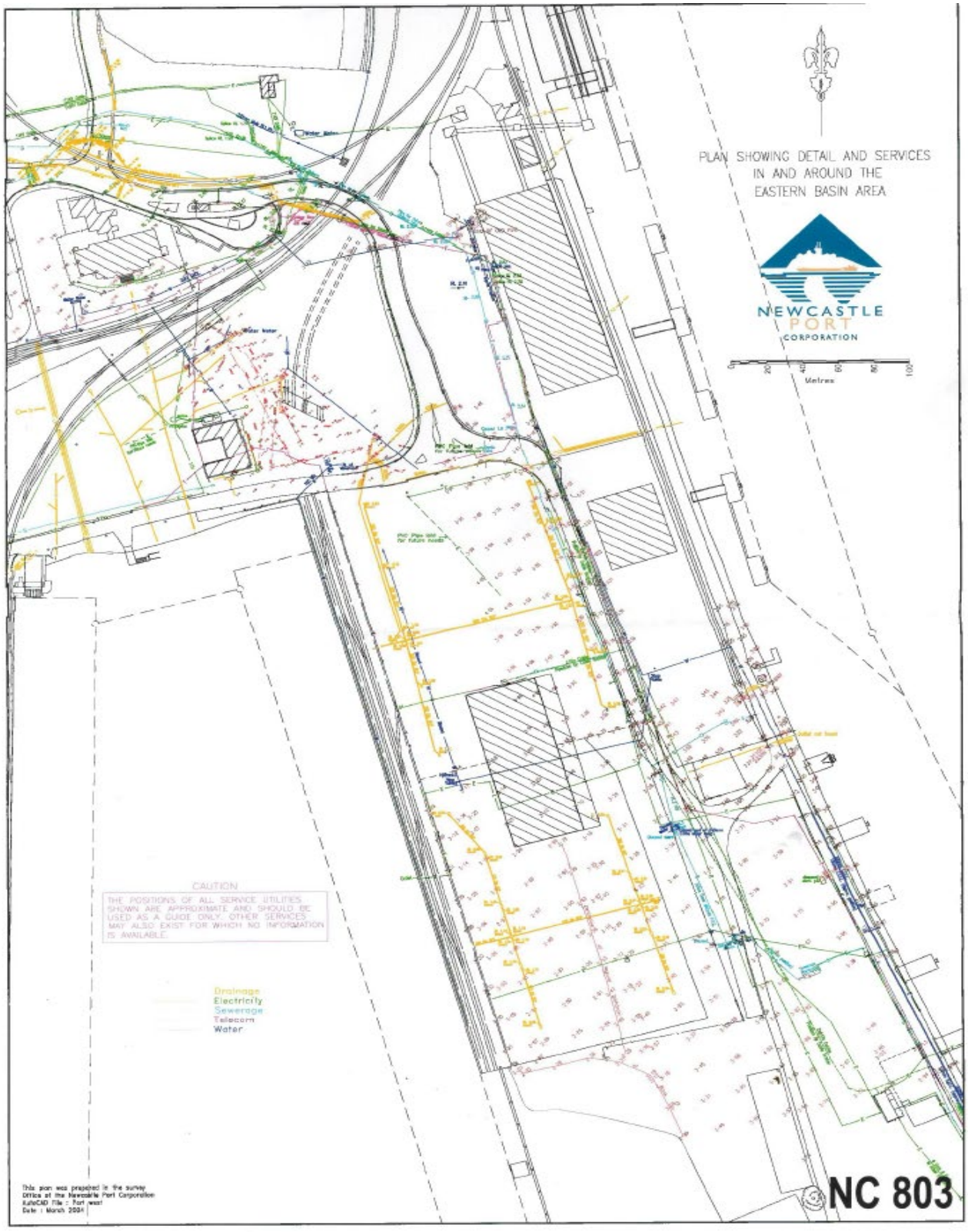
HARM MINIMISATION ARRANGEMENTS	
Hazard to persons on site	Mitigating Actions / Instructions
Exposure to emergency situations	• Site induction, emergency response plan and drills • PIRMP drills • Risk management incident, hazard and near miss reporting
Exposure to emissions & chemicals	• Personal protective Equipment available and used where relevant to site activities. • Assessment of potential occupational exposures where relevant to site activities. • Safe work instructions outlining activity control
Fire	• Plant operated & maintained to OEM standards, Plant shutdown when no required in use. Competent personnel operating. • Pre-start inspections with defect and repair management process established. • Plant suppression system or extinguisher fitted to plant, secondary egress points and emergency hammer. • Firefighting equipment throughout site as per emergency response plan
Explosion	• In addition to fire mitigations. • Limited quantity of combustible materials at site. • Segregation of incompatible products.
Pedestrian / Traffic interaction	• Implementation of the provisions of the LINX Traffic Management Critical Risk Controls (CRC). Through compliance with this CRC, the possibilities of interactions between personal, equipment and other plant will be minimised. • Implementation of Port Serves Exclusion Zone Standard. Through compliance with this standard, the possibilities of line of fire events will be minimised.
Loss of load/ containment failure	• Implementation of the provisions of the LINX Road Transport CRC. Through compliance of the CRC, LINX will ensure that all heavy vehicle operators are competent to perform their duties (COR) and have been appropriately trained and assessed in the operation of their equipment, including load restraint/containment and dangerous good training where relevant. • Pre-start inspections with defect and repair management process established.
Impacting community	• Site activities amended where environmental conditions are unsuitable (i.e., wind) • Site Environmental Management plan • PIRMP available on company website. Company contact details available on web site to enable reporting of community complaints. • Communicating with neighbours and the local community is an important element in managing the response to any incident. Emergency and other contact details are provided in this document

Location map



Port Precinct and EBDC leased area

Stormwater map

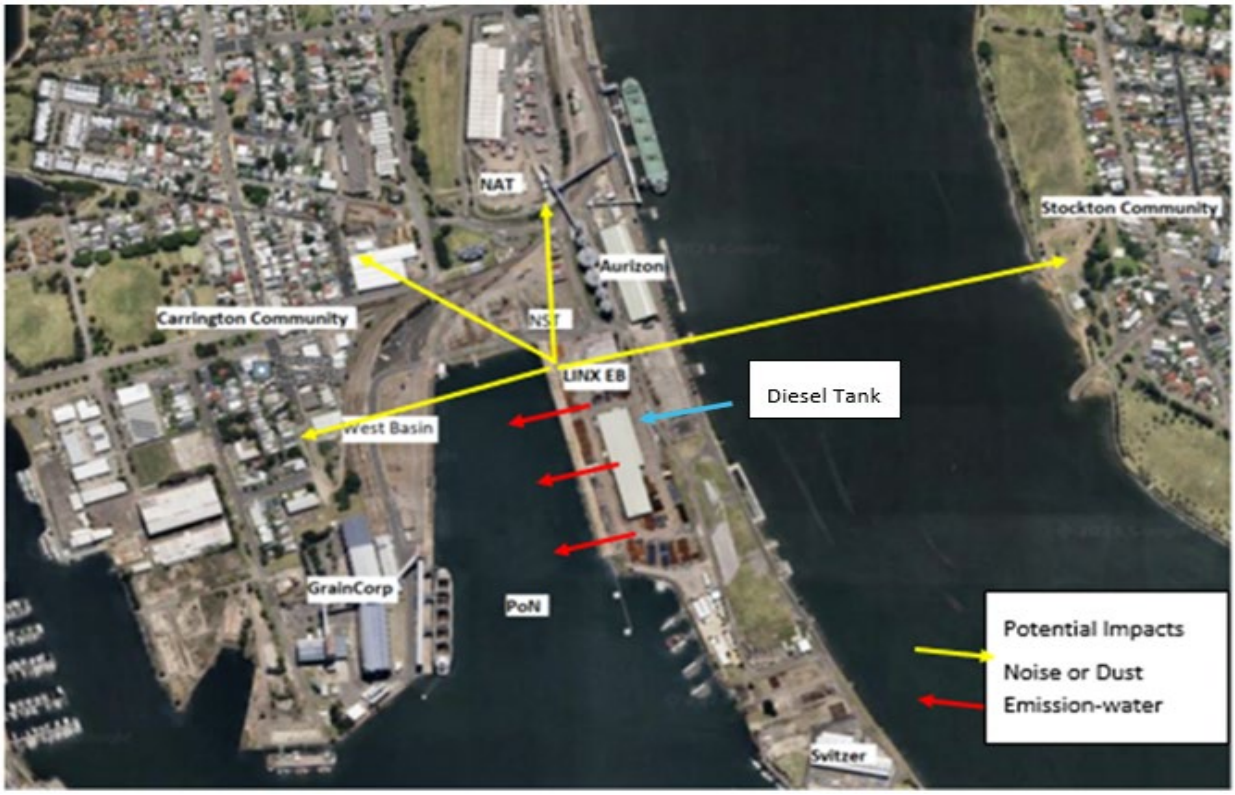


Surrounding area map

Provide a detailed map (or set of maps) showing the surrounding area likely to be affected by a pollution incident.

Premises pollutants map

Provide a detailed map (or set of maps) showing the location of potential pollutants on the premises.



Note: mobile plant operating throught site, refer to apendix xx

Immediate actions after a pollution incident

IMMEDIATE ACTIONS	
Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident.	
Action	Description
Stop	Stop the source and assess the severity
Call	**If an emergency, call IIS, otherwise call Manager, communicate any resources required.** **ISS First Response 1300 131 001** Emergency contact for external spills response where there is risk of environmental harm - ISS can mobilise resources including an emergency response coordinator, vac truck, street sweeper, pressure washing, confined space access for drainage, scheduled waste disposal etc.
Respond	Plan and implement the response to stop pollution
Restore	Restore the work environment, remediate impacts.
Report	Report incident internally and externally as required.
Actions to be taken during or immediately after a pollution incident	in the event of an incident, the Operations Manager is to assume responsibility for the site and is to coordinate all actions/activities under the guidance of emergency personal and relevant authorities' procedures/requests. This includes actions to combat pollution incident response. All staff are to be aware of and understand the provisions of the emergency procedures, the location of the Emergency Response Plan, and the Assembly Areas. Copies of the Site Emergency Response plan (including the contact list and site map) are to be held on site and controlled by the Operations Manager. A site map is included in the site induction and clearly shows the locations of: • hazardous/flammable chemicals stored on-site; • Safety Data Sheets (SDS); • emergency response equipment such as fire extinguishers; • first aid kits, spill kits, etc; and • assembly areas. The Site map is also displayed in a number of buildings throughout the site. Copies of the plan can be obtained through the Operations manager. All emergency incidents shall be recorded and an investigation coordinated by the relevant Operational Manager and the HSE Business Partner to determine the cause(s) of the incidents. An investigation report shall be developed explaining the causes and the corrective and preventative measures taken. The Site Emergency Response equipment will be tested/inspected on a regular basis. It is the responsibility of the relevant Operations Manager to ensure that these tests/inspections are conducted and recorded. This PIRMP shall be tested annually in accordance with legislative requirements.

Risk mitigation

RISK MITIGATION	
Develop 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 action(s) to be taken during, or immediately after, a pollution incident to reduce that risk.	
Action/Event	Description/ Safeguard controls
Incident Occurs	Workers to assesses the pollution event and determine if an emergency event or controllable event. Refer to Spill Severity Assessment Tool (SSAT) Note appendix 1. Where event is under control initiate spill response procedure immediately.
Evacuation Alarm	Evacuation Sirens (3) are located at the main office emergency evacuation point, the distribution centre wall and in the weighbridge. Further communications may be via UHF radio channel 21 EBDC / 1 & 2 Stevedoring or Portable Load speaker. Upon sounding of emergency alarm, workers shall retreat to the emergency evacuation point as per the site Emergency Response Plan. Wardens to identify risk of and injures and report to chief warden.
Emergency support	Chief warden is to assess the nature of emergency and facilitate response from required emergency services.
Initial Response	Consider any risk that may increase the potential for harm to people or environment (e.g., wind direction) Prevention of access to scene by unauthorised people. Where safe to do so, immediate actions will be undertaken to contain or mitigate the pollution event as per the spill's response procedure. Where safe to do so, first aid to be performed until relieved by emergency services.
Control	LINX Chief Warden is in charge unless relieved by emergency services. Emergency services have control of the scene until control is handed back to operations

Clean-up and funding actions

CLEAN-UP AND FUNDING ACTIONS	
Identify actions to be taken when combating the pollution caused by an incident, and how any clean-up and associated funding will be undertaken.	
Action	Description
Utilising external specialist serviced	ISS first response, Cleanaway eg: vac truck or drain cleaning
Investigating and remediate substantial spill to identify any risk to underlying soil and ground water	Follow company procurement policy
Replenish spills response equipment	Local spills response equipment supplier

Response responsibilities & training

The following roles are required to complete the listed activities, and the training requirements.

Activity	Responsibility	Training /Action
General Staff Training	Business Manager - Stevedoring & Eastern Basin	All site staff, contractors and visitors are provided with general environmental training in accordance with the provisions of this PIRMP. This training is delivered through a number of mediums including: • site induction and safety training. • familiarisation with this PIRMP and its content. • Spills response training • established company emergency response procedures. • equipment maintenance and operation practices and procedures, and • instruction in site operating practices. This requirement for training is reviewed on an annual basis in accordance with established procedures. This review is to be undertaken by the HSE Business Partner and Business Manager.
Reporting a pollution incident	All personnel and contractors	Company & Site Induction Spill Response Training (Awareness) as identified
Notification of pollution incident:	Business Manager - Stevedoring & Eastern Basin	Requirements of the NSW POEO Act PIRMP requirements Notification thresholds
Clean-up activities following a pollution incident, to mitigate potential environmental harm.	Business Manager - Stevedoring & Eastern Basin	Coordinated with other parties as required (e.g., PoN) Rely upon SME advice from HSE/Environment.
Generation of record using the PIRMP Test Drill Record template for each activation or drill of PIRMP	Business Manager - Stevedoring & Eastern Basin. All operational staff	As per PIRMP requirements • Scheduling and conducting annual drill • Recording drill • Recording events
Lifeguard incident reporting	Business Manager - Stevedoring & Eastern Basin	As per Incident Management Program
Maintaining equipment to respond to pollution incident	Business Manager - Stevedoring & Eastern Basin	As per PIRMP requirements

Testing and updating of this PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.

Detail below how the plan is to be tested and maintained to ensure 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. Note: Testing must cover all components of the plan. How the testing is to be documented and recorded must also be outlined (this must include the testing dates and the names of all staff members who carried out the testing). Detail the dates on which the plan was updated.

PIRMP TESTING				
Test date	**Tested by (all involved)**	Test details	**Findings**	**Next test date**
07/08/2019	Erin Bartley *HSE Advisor* Jamie Waddekk *Site Manager*	Simulation - fuel spill occurred when employee was refuelling a forklift	Contact details out of date	6/08/2020
28/07/2020	Erin Bartley *HSE Advisor* Darren Pozniak *Site Manager*	Simulation - Main hydraulic hose on forklift burst during operation 300L of hydraulic fluid lost	Contact details out of date, Additional spill response equipment required and new PIRMP template to be used	27/07/2021
13/8/2021	*Darren Pozniak* *Erin Pettit*	*Record not located however annual return identified as completed 13/8/2021*	N/A	13/8/2022
16/8/2022	*Darren Pozniak* *Erin Pettit*	*Record not located however annual return identified as completed 16/8/22*	N/A	16/8/23
28/7/2023	Jeff Collins Cory Page Glen Beckingham	Simulated spill using water to represent chemical spill from container.	Spill kit inspection can be improved Spill response training for EB personnel	28/7/2023
26/7/2024	Cooper Pozniak Stuart Giffney Darren Pozniak	Simulated fuel spill at diesel tank/bowsers	Plan contact details require update	26/7/25

PIRMP Activation and Drill Records

Records are to be retained for each activation of the PIRMP and for each testing (drill) and must be retained as an attachment to a Lifeguard Inspection, and any corrective actions managed via Lifeguard

Detail below how the plan is updated based on testing or periodic review.

PIRMP UPDATING				
Update date	**Reason for update**	Update details	**Date uploaded to website *if applicable***	**Date completed**
7/08/2019	Outdated items identified during annual testing	Contact Details	8/08/2019	8/08/2019
28/07/2020	Outdated items identified during annual testing and new template available for use	Contact details and new template including new maps and pollutant inventory	14/09/2020	14/9/2020
13/8/2021	Outdated items identified during annual testing	Contact Details	14/08/2021	14/08/2021
12/08/2022	Outdated items identified during annual testing	Contact Details	14/12/2022	14/12/2022
01/09/2023	Outdated items identified during annual testing	Contact Details	01/09/2023	01/09/2023
02/08/2024	Outdated items identified during annual testing and new template available for use	Full review and transferred to new IMS template	08/08/2024	08/08/2024

Spill Severity Assessment Tool (SSAT)

As the first responder, use the following table to determine the potential severity of a spill to people & environment. It will help you determine first steps and notifications required in response.

Circle the relevant colour below on each row – escalate UP to the highest category for potential severity. Then follow the corresponding first responder steps.

	SEVERITY POTENTIAL		
SPILL DETAILS	**HIGH – RED**	**MEDIUM – AMBER**	**LOW - YELLOW**
Product and size	• DG/Hazchem Spill > 10L • Hydrocarbons - *diesel, fuel, oil* - major > 100L • Chemicals, dissolvable > 50kg • Unidentified container spills/fume	• DG/Hazchem spill - *trivial amounts only* • Hydrocarbons *diesel, fuel, oil* 10-100L • Chemicals, dissolvable < 50kg • Inert materials - *e.g. grain* > 50kg	• Contaminated waters - *sediment, oily sheen, dissolved products, wastewaters* < 100L • Hydrocarbons - *trivial amounts (drips)* <10L • Inert materials <50kg
Location	**Offsite** • Into or near creek, river, waterways or wetlands/stormwater drainage • Public accessible site (roads etc), rail	**Other party's site** • Port • Customer	**Onsite** • On our LINX CC sites only
Impacting upon *consider if there is rainfall, wind, drainage, traffic etc*	• Waterways, wetlands, creeks, • Stormwater drainage network impacted • Marine • Public property / community	• Unsealed areas/dirt • Work areas compromised/impacted • Potential impact to stormwater drainage or on site retention • Could reach site boundary to neighbour	• Within bunds • Contained on sealed areas only • No potential impact on stormwater drainage • Confined to site – not beyond site boundary
FIRST RESPONDER STEPS: STOP CALL RESPOND RESTORE & REPORT	• Stop work • If on port /third party/customer site, follow site protocols as per induction • **If in public - call 000 if potential for harm** • **Where safe, stop leak/spill** • Call Supervisor/Customer Site Contact • Call HSE support • Request for external assistance e.g. vac truck	• Stop work • Call Supervisor/Customer Site Contact • **Where safe, stop leak spill** • Call HSE support • Respond to spill using spill response materials and follow site requirements • Report to LifeGuard LifeGuard	• Stop work • **Where safe, stop leak spill** • Call Supervisor • Clean up and dispose waste • Report to LifeGuard LifeGuard

Do not put yourself in harm's way. If you cannot identify the spilled material, treat it as hazardous and avoid contact.

Appendix 2 – Traffic Management Plan Map

Appendix 3 – Emergency Response Plan Map