

Pollution Incident Response Management Plan (PIRMP)				PL710/3	
Created by	Paul Wynn-Hatton	Created On	Oct 2015	Review Date	Oct 2017

Scope:

This document describes the Pollution Incident response Management Plan (PIRMP) of Gulf Western Oil, 92 – 96 Links Rd, St Marys, 2760.

Background:

[98B Form of plan (1) A plan is to be in written form.]

This procedure incorporates both the specific actions of PL140 (Oil Spill Containment and Clean Up), and the additional reporting requirements mandated by the **Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012**. References to the specific parts of the regulation are given in *[red boxed italics]* before each section.

Procedure:

This procedure will be relevant in the event of a pollution incident. A pollution incident is defined as if there is a risk of “material harm to the environment”.

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 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.

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[(1) General

The matters required under section 153C (d) of the Act to be included in a plan are as follows:

*(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the **relevant activity**)*

Gulf Western Oil performs the following operations on site:

- Storage of bulk base oil and lubricant additives
- Manufacture of lubricating oils
- Storage of lubricating oils
- Filling of lubricating oils into finished packages

Considerable effort has been made by Gulf Western Oil to ensure that both the environment and personnel are not exposed to any undue hazard from these operations.

Storage of bulk base oil and lubricant additives

Bulk base oil is delivered in sealed tanker directly into the factory premises. The entire factory is bunded to ensure there is no release to the environment. The bunding capacity of the factory is capable of handling the entire volume of stored oil on-site.

Lubricant additives are delivered in bulk, sealed 205L drums or sealed 1000L containers. Any drums and pallecons are immediately stored within the bunded factory area.

Manufacture and storage of lubricating oils

The entire blending operation is a closed system, with the exception of the additive adding tank (maximum 8000L capacity). All bulk base oils and bulk lubricating oils are stored in solid tanks contained in the tank farm (a separate bunded area) within the bunded factory.

Filling of lubricating oils into finished packages

All filling of lubricating oils is done within the bunded factory area. All finished product storage is also within the bunded factory area.

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[(1) General

*The matters required under section 153C (d) of the Act to be included in a plan are as follows:
 (b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood]*

Assessment of risk:

Any oil spill, whether from bulk storage, or individual packaged units is highly unlikely to occur.

Spills within the factory area can come from bulk storage, product transfer, or from individual packaging units, and these spills are isolated from the environment due to the factory bunding.

Spills in the storage shed or loading / unloading yard will come only from packaged units, of which the maximum would be a 1000L container. Gulf Western has a separate specific procedure to deal with oils spills that occur in this area. This procedure is titled "PL140 Oil Spill Containment and Clean Up".

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[(1) General

The matters required under section 153C (d) of the Act to be included in a plan are as follows:
(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
(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.]

All new factory employees are trained in the procedure “PL140 Oil Spill Containment and Clean Up” as part of their induction to the company by the Quality Manager. Facilities and materials are inspected monthly by the Production Manager and Quality Manager.

[(1) General

The matters required under section 153C (d) of the Act to be included in a plan are as follows:
(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity]

Gulf Western maintains an up to date inventory of stock levels for both base oil and materials, and finished products. This is updated daily and confirmed by physical count monthly.

[(1) General

The matters required under section 153C (d) of the Act to be included in a plan are as follows:
(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 maximum capacity of bulk oil storage at Gulf Western Oil at any point in time is less than 1,000,000L. This bulk material is contained within a bunded area within the factory which is also bunded. The maximum amount in any one tank within this bunded area is ~60,000L. Maximum holdings of finished product within the bunded factory area at any point in time is of the order of 1,000,000L, with the maximum amount being 1,000L.

[(1) General

The matters required under section 153C (d) of the Act to be included in a plan are as follows:
(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]

Bulk material is contained within a bunded area within the factory which is also bunded. Finished product is contained in sealed packaging in dedicated racking within the factory, which is bunded.

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[(1) General

The matters required under section 153C (d) of the Act to be included in a plan are as follows:

- (g) the names, positions and 24-hour contact details of those key individuals who:

 - (i) are responsible for activating the plan, and*
 - (ii) are authorised to notify relevant authorities under section 148 of the Act, and*
 - (iii) 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]*

Responsibility for the plan, authorisation and response contacts are:

Ben Vicary – General Manager 0417 244 439
 Paul Wynn-Hatton – Quality Manager 0409 711 784

Relevant authority contacts are:

- the EPA, Environment Line on 131 555
- the Ministry of Health
 - Ph: 02 4734 2022 (work hours)
 - Ph: 02 9845 5555 (after hours)
- the WorkCover Authority – phone 13 10 50
- Penrith Council – phone 4732 7777
- Fire and Rescue NSW – phone 000.

[(1) General

The matters required under section 153C (d) of the Act to be included in a plan are as follows:

- (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,*
- (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]*

In the case of a major spill or environmental hazard the Emergency Alarm will be sounded. All staff will immediately shut down critical equipment and proceed to the assembly area. The General Manager (or other management team representative) will immediately notify the required Emergency Service and proceed to the assembly point with the manifest. The primary assembly point is outside the main gate at the Emergency Assembly Area Sign on the fence. Wardens will ensure that all staff have evacuated their respective areas quickly and safely, then proceed to the assembly point to verify that all staff are present by marking the Staff Checklist.

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[98E Testing of plan

(1) The testing of a 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.

(2) Any such test is to be carried out:

(a) routinely at least once every 12 months, and

(b) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.]

Oil Spill Training and Emergency Evacuation Training

A trial oil spill response (according to PL140) and Emergency Evacuation is conducted annually, documented and reviewed as part of the quality management system.

Maintaining facilities

Emergency spill kits are located throughout the factory. It is the responsibility of all employees to ensure they are easily accessible and ready to be used. The Factory or Quality Manager inspect the spill kits monthly. Spill kits that are deficient or unacceptable are remedied as soon as possible. This is reported in the monthly SHEQ report.

The emergency evacuation alarm system and sprinkler system is tested monthly by external contractor.

Version Control:

- Version 1 New document created by Paul Wynn-Hatton (3rd May 2012)
- Version 2 Update to new premises (March 2014)
- Version 3 Update to frequency of inspection of facilities and materials (October 2015)