



Division	Fuels & Infrastructure
Type	Plan
Title	Kurnell Terminal Pollution Incident Response Management Plan (PIRMP)

Pollution Incident Response Management Plan

Kurnell Terminal

1. INTRODUCTION

The Pollution Incident Response Management Plan (PIRMP) has been prepared for Caltex Australia Petroleum Pty Ltd - Kurnell Terminal (EPA Licence No 837), to set out specific requirements for achieving compliance with the relevant requirements introduced in the Protection of the Environment Legislation Amendment Act 2011 (POELA Act, 2011) related to timely notification and management of the pollution incidents causing “material harm”.

2. OBJECTIVES

The objectives of this PIRMP are to:

- ensure comprehensive and timely communication about the pollution incident to:-
 - Caltex and sub-contractor personnel;
 - Environmental Protection Authority;
 - NSW Ministry of Health;
 - SafeWork NSW;
 - Fire and Rescue NSW;
 - Kurnell Government Agency ;
 - Wider community outside the facility who may be affected by the impacts of the pollution incident.
- minimize and control the risk of pollution incident at the facility through
 - Identification of risks;
 - Development of planned actions ;
 - Implementation and close out of the planned actions in a timely manner.
- ensure that the plan is implemented by
 - trained personnel with responsibility for implementing the plan;
 - regular testing for accuracy, currency and suitability .

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3. DEFINITIONS

Pollution Incident

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.

Material Harm

- 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.*

For the purposes of this definition, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Environment means components of the earth, including:

- (a) *land, air and water, and*
- (b) *any layer of the atmosphere, and*
- (c) *any organic or inorganic matter and any living organism, and*
- (d) *human-made or modified structures and areas,*

and includes interacting natural ecosystems that include components referred to in paragraphs (a)–(c).

EPA

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means the Environment Protection Authority constituted by the Protection of the Environment Administration Act 1991

A premise includes:

A building or structure, or (b) land or a place (whether enclosed or built on or not), or (c) a mobile plant, vehicle, vessel or aircraft.

Pollution means:

(a) water pollution, or (b) air pollution, or (c) land pollution.

Activity means:

An industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).

4. TYPES OF INCIDENTS TO BE NOTIFIED

Only those incidents which occur in the course of an activity so that material harm to the environment is caused or threatened are to be reported.

Note on exclusions:

- (a) Definition of "Pollution Incidents" excludes **Noise**;
- (b) **Odour is not required to be reported** as a Pollution Incident under Part 5.7, s.148 (7) of Protection of the Environment Operations (POEO) Act 1997.
- (c) A person is not required to notify an incident if the incident is an ordinary result of action required to be taken to comply with an Environment Protection Licence, an Environment Protection Notice or other requirement of or made under this act (s.151 of POEO Act, 1997).

5. NOTIFICATION RESPONSIBILITY

The Kurnell Terminal Operations Manager (TOM) or Environment Specialist, Lic Sites has primary responsibility for calling the five Agencies identified in the Key Contact List in Table 9.1. Responsibilities for statutory reporting are identified in the **Incident and Injury Management Responsibilities for Statutory and Internal Reporting** (refer MD-OEMS-Proc-16.2)

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As indicated in Section 3.3 of the Emergency Response Plan for Kurnell Terminal, the Terminal Operations Manager (TOM) is responsible for ensuring that all site personnel are properly trained in their roles and responsibilities with respect to execution and maintenance of this plan. This responsibility extends to all third parties entering the site, including contractors, tanker drivers and visitors whose emergency response training shall take place via the site induction.

Following the initial notification, the Terminal Operations Manager (TOM) is responsible for consulting with the Emergency Services, Support Agencies, external authorities and neighbouring premises in matters relating to this plan.

All site based personnel are responsible for being familiar with this PIRMP, and in particular, being fully conversant with the actions expected of them in the event of an emergency.

6. DESCRIPTION OF ENVIRONMENTAL HAZARDS

The Kurnell site's Environment Management System (EMS) is ISO14001 certified. As part of the EMS, the Kurnell site has identified the environmental aspects and impacts of its activities and has documented these in area specific Environmental Aspect and Impact Registers. The combined environmental risk register for the Kurnell site. This register includes the aspects, risks and controls associated with the terminal operations, soil regeneration facility, tank maintenance, and demolition and remediation works. Identified risk control improvement are also included in the register.

These Registers are reviewed annually. Following are some of the environmental hazards identified:

Table 6-1

Potential Risk Scenario	Remarks
Fire and explosion	The scale, extent, duration and nature of the material relating to each of the identified risks will likely determine if the consequence is causing or has the potential to cause material environmental harm.
Loss of Containment to land or water - examples are uncontrolled releases of hydrocarbons waste	
Pollution of waterways during shipping discharge or other activity	

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Oil spill requiring response	Licence Exceedances are not included in this plan as these are reported as per the licence reporting conditions and in the "Annual Return".
Oil sheen in bay during rain event or shipping activity	
Ship refuelling incident	
Equipment damage resulting in an uncontrolled release	
Failure of power system	
Tanker truck accident (offsite)	

7. INVENTORY OF POLLUTANTS

Kurnell Terminal receipts, stores, handles and distributes a large number of fuel products and fuel additives, and has a comprehensive system for safe handling of such materials. The site uses this system that includes amongst others,

- Dangerous Goods and Hazardous Substances Manifest and Notification Procedure
- Safety Data Sheets
- procedures for the approval of new chemicals on site
- procedures for safe storage, use and disposal of these materials

In addition, to meet the requirements of Acts other than the environmental legislation, updates of the Dangerous Goods and Hazardous Substance Manifest and List are undertaken and provided to NSW SafeWork Authority.

Section 5.6 of the ERP provides a list of Hazardous Chemicals and other relevant data.

8. COMPREHENSIVE EMERGENCY RESPONSE PLAN

The Kurnell site (land and wharf) is staffed 24 hours a day, 365 days a year by an experienced Operations team. In addition, a security team located on site (land and wharf) undertake regular patrols around the site. There are a number of early detection systems installed on tanks, piping and other storage units to monitor flow movements and tank fill rates. These systems include:

- Tank gauging
- High and high-high level alarms

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- Independent tank over-fill alarms which trip out fill valves
- Lower Explosive Level (LEL) monitors/alarms in bunds (for Gasoline)
- CCTV and flame detectors on tank tops - images back to Terminal Control room
- Monitoring and alarms for uninitiated tank fill (and flows to/from or in incorrect direction)

Similar detector and alarm systems are in place at the Wharf. They are automatically activated during ship tanker discharge in the event of flow irregularities or losses from the system.

A key part of the Operations Coordinators role (land and wharf) is to monitor product flow/movements and the systems mentioned above. All such movements are monitored and tracked using the Digital Control System (DCS). In cases where an alarm is activated, their role is to acknowledge the alarm, investigate the reason for the alarm and respond accordingly as a *first responder*. They have a number of *first responder* tools available:

- Use of spills kits strategically located around the site along with additional back up equipment and supplies, as needed
- Use of marine oil spill booms and marine vessels to contain and/or disperse a Level 1 spill where possible
- Activate the Kurnell site alarm and notify Caltex Emergency Hotline and other agencies, as appropriate
- Shut down all terminal operations via the DCS

The Kurnell Terminal operates a comprehensive Emergency Response Plan (ERP) as part of the Caltex Crisis Management Framework (Doc SD101421). The ERP describes:-

- various procedures to be followed or complied with;
- available response equipment & safety gear;
- outline of the teams of trained people to support the implementation of that plan.

In addition to the ERP, a number of Scenario Guidance Notes (SGN) have been developed to deal with the types of possible emergency events. Amongst these SGN's are ones that deal with pollution events to land and water. These tools, along with the ERP, are also used as training aids for the

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Operations Coordinators and the other members of local emergency response team.

To date the ERP and the SGN's has been successful in protecting and minimizing impacts on the environment. Regular exercises are carried out and changes to the plan are made as required to incorporate learning from the exercises. Copy of the Kurnell Transitional Emergency Response Plan is published in the Caltex DMS and available to third parties on request.

The components of the Emergency Response Plan and this PIRMP are cross-referenced to the relevant sections of the Environment Operations Act 1997 and POEO (General) Regulation 2009 – refer to Appendix B.

The site operates a 24 Hour Kurnell Community Hotline for the community to report any possible off site pollution events. To assist in an emergency situation, Caltex also operates a centralised emergency response service through the 24/7 ERS Provider (IXOM), referred to as the Caltex Emergency Hotline. This is **a 24 HOUR, 7 DAYS per week emergency response unit.**

The 24/7 ERS Provider Service has been contracted by Caltex to:

- provide a single point of contact with all appropriate Caltex response staff, on a 7 day/24 hour basis
- ensure contact is established with all appropriate Emergency Services
- ensure Caltex management and appropriate crisis management personnel are notified
- provide specialist response /first aid /technical advice (e.g. safety data sheet information)

The Caltex Emergency Hotline will be used by employees to ensure that all relevant staff and authorities are notified.

The Caltex Emergency Hotline contact number is (toll free):

1 800 033 111

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9. CONTACT DETAILS OF THE RELEVANT AUTHORITIES TO BE NOTIFIED OF POLLUTION INCIDENT

Table 9-1 KEY EXTERNAL CONTACT INFORMATION

Relevant Authority (Order of Calling)	Telephone	Email	Communication Responsibility
Mandatory Agencies to Contact in Priority Order – NB. Request a Call Reference No.			
1. Whether there is threat to human health or property or not			
Fire & Rescue NSW	000	NA	Security Guards
2. Appropriate Regulatory Authority (ARA) – Only one of the three			
NSW EPA (our licence no. 837)	13 15 55 or 9995 5555	info@ environment.nsw.gov.au	Kurnell Terminal Ops Mgr. or Environment Specialist- Lic Sites
Sutherland Shire Council	9710 0333 or 85362224* (*EM contact)	ssc@ssc.nsw.gov.au	Kurnell Terminal Ops Mgr. or delegate
Ports Authority NSW	9296 4000 or 9296 4001	www.sydneyports.com.au	Terminal Operations Specialist - Wharf
3. Environmental Protection Authority (when not an ARA)			
NSW EPA (our licence no. 837)	131555 or 9995 5555	info@ environment.nsw.gov.au	Kurnell Terminal Ops Mgr. or delegate
4. NSW Health (Public Health Unit – Randwick)			
South Eastern Sydney Local Health District (Public Health Unit)	9382 8233 AH:9382 2222	No specific email available: call on numbers listed	Kurnell Terminal Ops Mgr. or delegate
5. SafeWork NSW			
SafeWork NSW	13 10 50 A/H: 92149220	contact@safework.nsw.go v.au	Kurnell Terminal Ops Mgr. or delegate

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6. Local Council (If not the ARA)			
Sutherland Shire Council	85362224 0414193743* (*EM contact)	ssc@ssc.nsw.gov.au dkelly@ssc.nsw.gov.au	Kurnell Terminal Manager or delegate
7. Where there is no threat to human health or property			
NSW EPA (our licence no. 837)	13 15 55 or 9995 5555	info@ environment.nsw.gov.au	Kurnell Terminal Ops Mgr. or Environment Specialist- Lic Sites
Other Emergency & Regulatory Agencies - if Required			
Poisons Information	24hr Call Centre	13 11 26	Kurnell HSSE Representative
Davidson Trahaire Corpsych	Caltex Employee Assistance	1300 360 364	
Key Caltex Contacts			
Caltex Crisis Management Team – Duty Manager	1 800 033 111		Notified by Kurnell Terminal Ops Mgr. or Caltex Duty Manager
Senior Media Adviser			
National Infrastructure Ops Manager			
(NSW) Regional Terminal Ops Manager			

9.2 Community

Consultation with community members during and/or after a reportable pollution incident will be undertaken in accordance with this PIRMP. The police will generally take on the role of interfacing with site neighbours but may require the assistance of Caltex personnel. This role (and prior to police arrival if necessary) should be delegated by the Caltex Emergency Controller so that adequate resources remain at the site to respond to the emergency. Where emergency services do not take on this role, Caltex will consider utilising various communications tools such as phone calls, door knocking and letter box drops as appropriate for the incident and its impact.

9.3 Kurnell Neighbouring Sites – Contact Details

A list of contact details for neighbouring sites is presented in Table 9-3 below.

Table 9-3 Neighbour Contact List

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Organization/Neighbour	Telephone	Communication Responsibility
Kurnell Public School (e-mail: kurnell-p.school@det.nsw.edu.au)	(02) 9668 9864	Kurnell Terminal Operations Manager or delegate
Kurnell Pre-School Kindergarten	(02) 9668 9638	
Kurnell Progress and Precinct Residents Association Inc	(02) 9668 9246	
Neighbours (impacted only)	As per contact details in EOC	
Desalination Plant, Sydney Water	1300 139 967	
CBOX Containers	0416202441 1800433455	
Kurnell Community Sports & Recreation Club	(02) 9668 9259	
National Parks Botany Bay National Park Duty Officer	(02) 9668 2000 0419 428 054	

Note:

Caltex has collected personal information (telephone numbers) for the sole purpose of communication to its neighbours in the event of an emergency where adjoining premises need to be advised of the emergency so that appropriate action (if required) can be taken. Personal information held by Caltex in accordance with the Privacy Act 1988 can be accessed by asking a privacy-related question or obtaining a copy of Caltex's Privacy Policy statement. Please write to "the Privacy Compliance Officer, Level 24, 2 Market Street, Sydney 2000". Caltex's privacy Statement can also be viewed at www.caltex.com.au

9.4 Incident Risk Ranking

Table 9-4 - Incident Risk Ranking below, provides a list of products stored at Kurnell Terminal and the need for early warning, depending on the nature of the incident. Early warning requirements for neighbours are included. Where the likely impact on Neighbours is rated Medium or High, action must be taken to advise neighbours of the incident. The Police shall inform affected neighbours and adjacent businesses. In their absence or at their request, the Terminal Emergency Controller or their delegate, shall inform affected neighbours and adjacent businesses.

Table 9-4 Incident Risk Ranking

Chemical	Chemical Hazard?	Amount Stored (kl)	Need for Early Warning	Potential Hazards Identified	Level of Impact	Likelihood	Priority	Impact on Neighbours
Gasoline	Yes	<330000	Yes	• Release to ground;	M	L	M	L - M

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Chemical	Chemical Hazard?	Amount Stored (kl)	Need for Early Warning	Potential Hazards Identified	Level of Impact	Likelihood	Priority	Impact on Neighbours
				• Release into stormwater;	H	L	H	H
				• Vapour cloud; odour	H	L	H	H
				• Ignition – explosion, fire, smoke	H	L	H	H
Diesel	Yes	<285,000	Yes	• Release to ground;	M	L	M	L-M
				• Release into stormwater;	H	L	H	H
				• Ignition – fire, smoke	M	L	H	M
Jet Fuel	Yes	<145,000	Yes	• Release to ground;	M	L	H	L-M
				• Release into stormwater;	H	L	H	H
				• Ignition – fire, smoke	H	L	H	H
Additives	No	<45,000	Yes	• Release to ground;	M	L	M	L-M
				• Release into stormwater;	H	L	H	H
				• Ignition – fire, smoke	L	L	M	M
Slops	Yes	<50,000	Yes	• Release to ground;	M	L	M	L - M
				• Release into stormwater;	H	L	H	H
				• Ignition – fire, smoke;	H	L	H	H
				• Vapour cloud	H	L	H	H
Oily Water	No	<45,000	Yes	• Release to ground;	M	L	M	L

9.5 Contact Details of Site Contact for Waste Transport Incident

In the event of a pollution event involving the transport of waste from the Kurnell site to a waste treatment facility (e.g. landfill), the Caltex Emergency Response Hotline (*toll free*) can be contacted to alert us of the incident and request our response.

Title	Direct
Caltex Emergency Response Hotline	1800 033 111

10. RELEVANT INFORMATION TO BE GIVEN WHEN NOTIFYING

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The relevant information to be given according to Section 150 of the POEO Act (1997) when notifying the incident to the regulatory authorities is as follows:

- a) Time, date, nature, duration and location of the incident
- b) Location of the place where pollution is occurring or is likely to occur
- c) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- d) The circumstances in which the incident occurred (including the cause of the incident if known)
- e) Action taken or proposed to be taken to deal with the incident, and any resulting pollution or threatened pollution, if known
- f) When the information relating to items c), d) or e) is not known at the time of verbal notification, this information must be provided once it becomes available

11. PROCEDURES TO BE FOLLOWED

The relevant parts of the Caltex Kurnell Emergency Response Plan and its procedures would be activated for delivering this Pollution Incident Response Management Plan (PIRMP). If a pollution event occurs, the emergency controller will take actions according to the Kurnell Terminal Emergency Response Plan.

However, for completeness of the Pollution Incident Response Management Plan, the following additional information is presented:

11.1 Other Notification of Pollution Incidents

The EPA may, as per section 151A of the POEO Act (1997),

- direct the person verbally to notify such other persons of the incident as it requires;
- specify the manner and form of notification;
- direct that any initial verbal notification be followed by written notification.

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11.2 Identification of Appropriate Regulatory Authority

Should a pollution incident occur, the Senior Environmental Specialist (SES) Licensed Sites will have the responsibility of determining the “Appropriate Regulatory Authority” (ARA). This, in turn, will determine the party or parties to be notified.

11.3 Notification of employees and other site personnel

All personnel on site (employees and contractors) will be informed immediately of a site emergency (which can include a “Pollution Incident”) via the Site Emergency Alarm or the Terminal public broadcast system.

Members of the Kurnell Terminal Emergency Response Team and other personnel involved with the implementation of the ERP related to the pollution incident are notified by phone or SMS as soon as the emergency has been identified.

11.4 Roles and Responsibilities

The roles and responsibilities defined in the Kurnell Terminal ERP are not in any way reduced by the preparation of this PIRMP.

The responsibilities specific to the PIRMP are included in the relevant parts of this report for clarity.

11.5 Response Triggers

Triggers requiring a response or update of this PIRMP include:-

- Community complaints that warrant an update;
- Regulatory response or instruction;

Odour events are classified as Class B or A events in accordance with Section 5.2 of procedure “Responding to Community Concerns M-OEMS-STD-14.7.

12. AVAILABILITY OF PLAN

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This PIRMP will be available on the Caltex Public Website and will be supplied free of cost to anyone requesting the plan in writing, generally within 14 days of the request being made.

This PIRMP will be included as an Appendix in the Kurnell Terminal Transitional Emergency Response Plan.

Hard copies of the Plan will be retained at the Kurnell Terminal at:

NAME	LOCATION
Operations Coordinator	Operations Control Room
Duty Operations Coordinator	Emergency Operations Centre (EOC)
Terminal Operations Manager	TOB Office
Emergency Manifest Box	Kurnell Terminal Main Entrance – Emergency Operations Centre (EOC)

Soft copies will be stored in the Caltex Document Management System (DMS), with easy access via the Terminal Environment Key Information page.

Details of this Plan will be made available to authorised personnel on request.

13. STAFF TRAINING

Staff training requirements of this PIRMP are included in Environmental Awareness Training which is provided to all Terminal personnel via the Caltex Learning Management System (LMS).

14. TESTING OF PLANS

This plan will be tested routinely once every 12 months and the accuracy of the information contained within the plan checked and confirmed. Consistency with other related procedures developed in the preceding 12 months will also be confirmed.

A specific aspect of this Plan will be tested in a Desktop Exercise every 12 months, and concurrent field tests will be conducted as needed.

This plan will also be tested,

- within one month of the occurrence of any “pollution incident”, or

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- at the discretion of Distribution Leadership Team (DLT), to incorporate improvements to the effectiveness and workability of the plan as well as changes to responsibilities of the persons implementing this plan, for example, within one month of the occurrence of any “pollution incident”.

Results of the tests will be used for incorporating:

- improvements to the effectiveness and workability of the plan;
- changes to responsibilities of the persons implementing the plan;
- changes in contact details.

These changes will be incorporated into the Plan within 3 months of the tests taking place. A log of tests, showing the dates, and learnings is included at the rear of this Plan in Appendix A. Any actions arising from the post event debrief will be held in Cintellate and tracked to completion.

Note: The Kurnell Terminal ERP has its own testing plan and timelines for testing relevant equipment appropriately as per Legislative Requirements, Australian Standards and International Standards where available and in that order. If the testing requirements detailed in this section are also mentioned in the ERP then they are to be regarded as the same otherwise the testing requirements are to be regarded as over and above those listed in the Emergency Response Plan.

15. REPORTING

A post –incident Debrief report will be prepared following any Incident which triggers this PIRMP. In such instances, Caltex will appoint a Lead Investigator who will report to Management, under Legal Privilege if required.

Where the report identifies recommended changes to the Plan, such changes will be incorporated into revisions in the Plan.

Diagrams

Diagram 1. Geographical Location of Kurnell Terminal Site

Diagram 2. Street Map of the Kurnell Peninsula

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Diagram 3. Kurnell Terminal Layout (Land Based Operations)

Diagram 4. Kurnell Terminal Surrounding Land Use

Diagram 5. Emergency Services Briefing Map

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Appendices

Appendix A. Log of Plan Tests

Appendix B. Kurnell PIRMP and ERP Alignment with Environment Operations Act 1997 and POEO (General) Regulation 2009

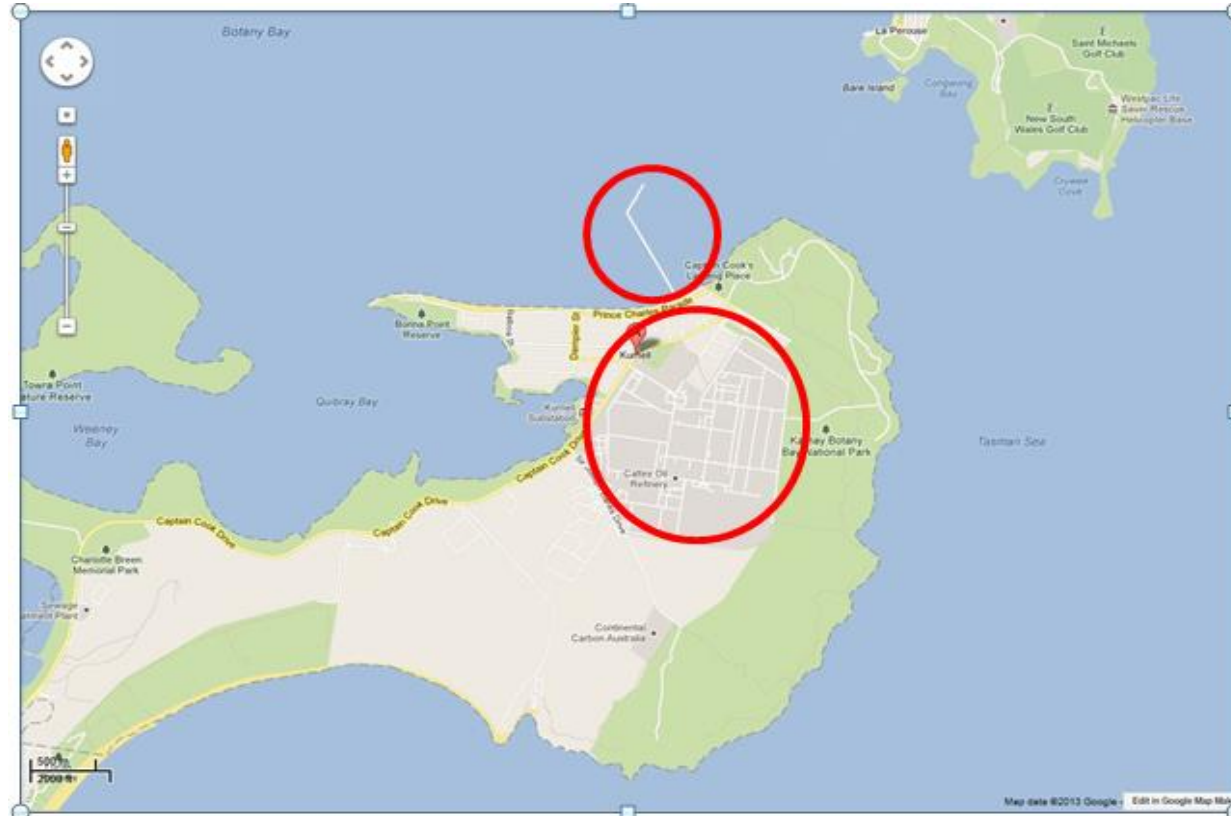
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Diagram 1. Geographical Location of Caltex Terminal Site (Land and Wharf)



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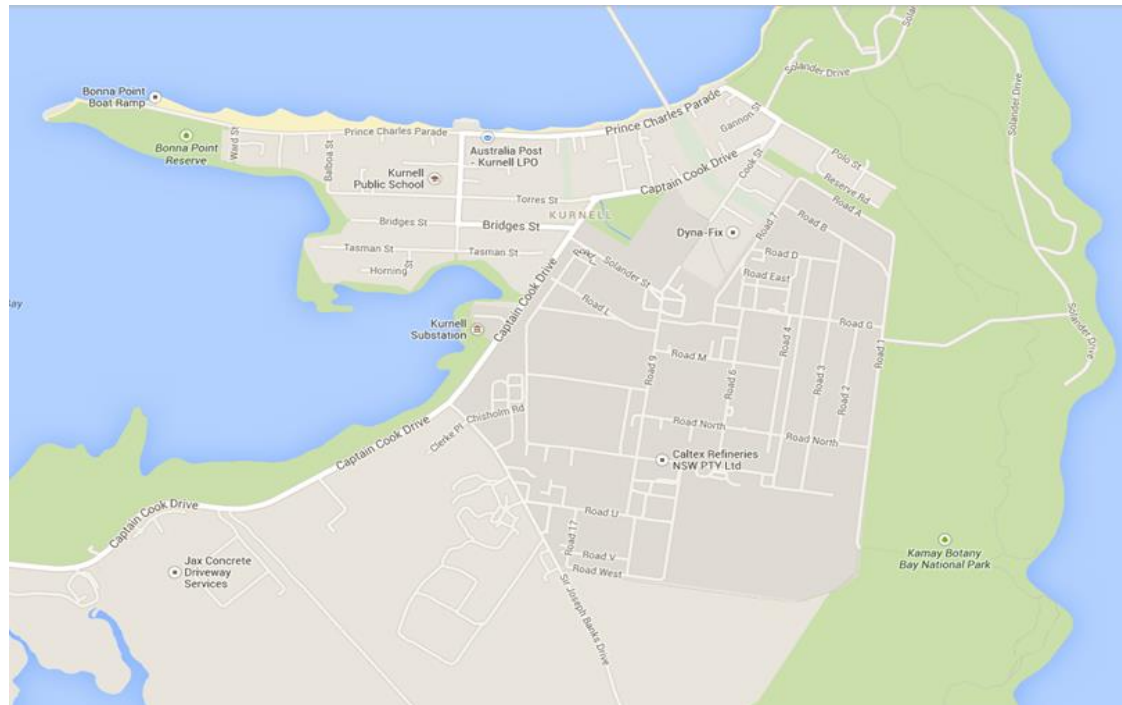
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Diagram 2. Street Map of the Kurnell Peninsula



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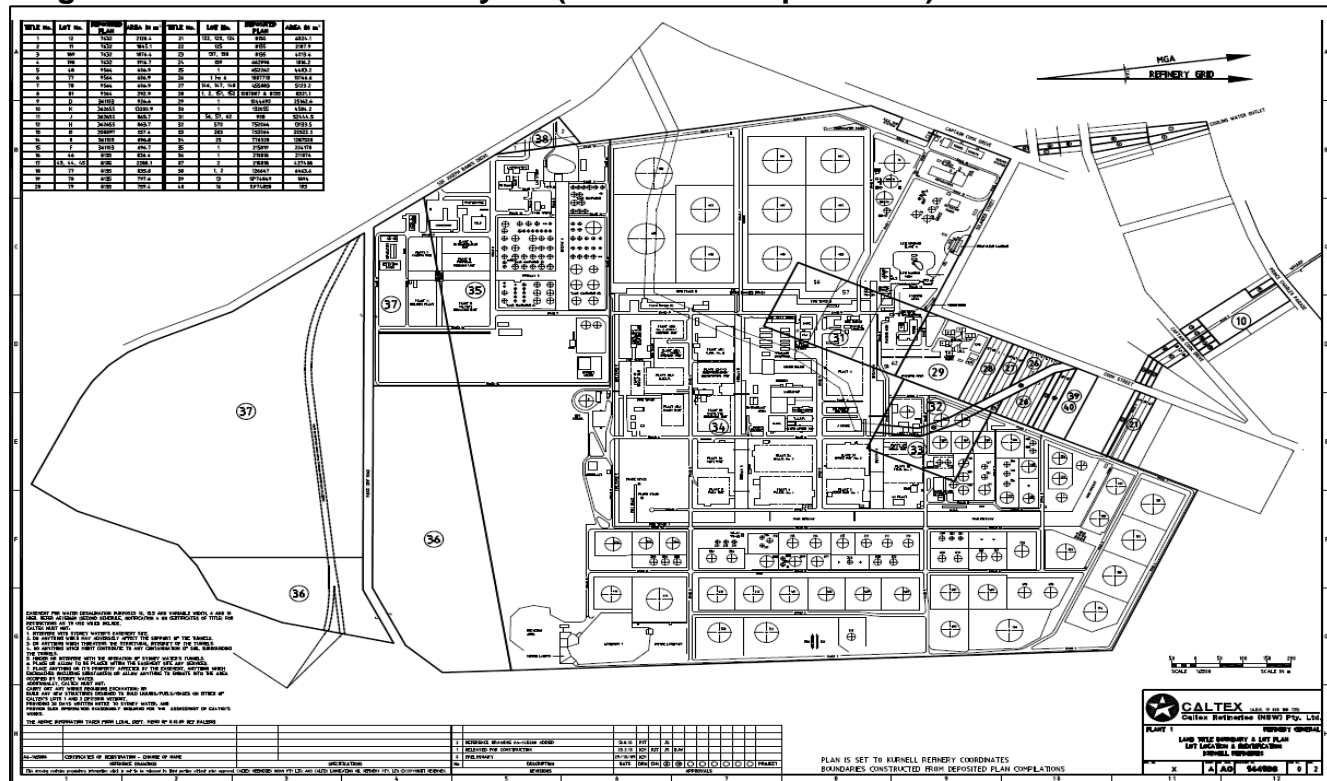
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Diagram 3. Kurnell Terminal Layout (Land Based Operations)

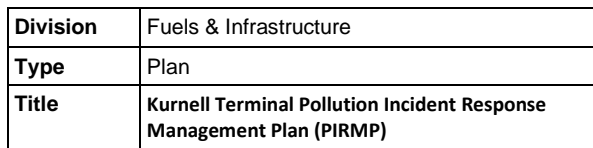


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Diagram 4. Kurnell Terminal Surrounding Land Use



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Appendix A.

Log of Plan Tests

Test Date	Results	Actions Resulting
2016 Program		
24 August 2016	Exercise completed successfully	Administrative changes required to ERP and PIRMP
2017 Program		
7 March 2017	Exercise completed successfully	Nil PIRMP changes needed
22 June 2018	Exercise completed successfully	Nil
2018 Program		
23 October 2018	Exercise completed successfully	Administrative changes required to PIRMP
21 June 2018	Activation of Oil Spill Equipment Exercise completed successfully	Nil
2019 Program		
12 March 2019	Full Surface Tank Fire Exercise – PIRMP activation test	Nil PIRMP changes needed
22 August 2019	Pool Fire - Pipeway and pump slab - PIRMP activation test	Nil PIRMP changes needed
2020 Program		
25 Feb 2020 Half Day event: PIRMP Regulatory framework training conducted by A. Doig, ASBG and accompanying Scenario Exercise: Jet Fuel line LOC – localised pollution to soils	All NSW Terminals represented at the Training and the scenario exercise. Draft EPA Guideline discussed All PIRMP's will be revised (format and extra Maps) once the EPA Guideline is published	Change to the contact details for Bayside Council: Now 1300 581 299 Updated Test Log details

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Appendix B.

Kurnell PIRMP and ERP Alignment with Environment Operations Act 1997 and POEO (General) Regulation 2009

Environment Operations Act 1997		
Section of Act	PIRMP Section Reference	Kurnell ERP (where relevant)
153A	1. Introduction	3. Introduction
153C	5. Notification Responsibilities 8. Comprehensive Emergency Response Plan 9. Contact Details of Relevant Authorities to be Notified of Pollution Event <ul style="list-style-type: none"> Table 9.1: External Contact Information Table 9.2: Internal Contact Information Table 9.3: Neighbourhood Contact List 	7.0 Roles and Responsibilities 9.1 Notification of an emergency
153D	12. Availability of Plans	2.0 Distribution List
153E	14. Testing of Plans	6.10 Training, Testing, Exercises
153F	5. Notification Responsibilities 8. Comprehensive Emergency Response Plan 11. Procedures to Follow	8.3 Spills Containment & First Aid Resources 9.0 Response procedures 9.1 Notification of an emergency
POEO (General) Regulation 2009		
Section of Act	PIRMP Section Reference	Kurnell ERP (where relevant)
98C(1) (a)	6, Description of Environmental Hazards	5. Site Profile
98C(1) (b)	6, Description of Environmental Hazards <ul style="list-style-type: none"> Table 9.4 Incident Risk Ranking 	5.7 Major Incident Hazards 6.2 Risk Assessment
98C(1) (c)	8. Comprehensive Emergency Response Plan	Kurnell ERP (whole)
98C(1) (d)	7. Inventory of Pollutants	5.6 DG and Hazardous Materials 5.7 Major Incident Hazards
98C(1) (e)	<ul style="list-style-type: none"> Table 9.4 Incident Risk Ranking 	5.7 Major Incident Hazards 6.2 Risk Assessment
98C(1) (f)	8. Comprehensive Emergency Response Plan	Kurnell ERP (whole)
98C(1) (g)	<ul style="list-style-type: none"> Table 9.2: Internal Contact Information 	6.7 Local Emergency Management Team 8.1 Emergency Contacts
98C(1) (h)	<ul style="list-style-type: none"> Table 9.1: External Contact Information 	6.6 Regional Emergency Management Team 6.7 Local Emergency Management Team 6.8 Incident Control 6.9 Emergency Operations Centre

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POEO (General) Regulation 2009		
Section of Act	PIRMP Section Reference	Kurnell ERP (where relevant)
98C(1) (i)	9.2 Community	6.8 Incident Control 6.9 Emergency Operations Centre 7 Local Emergency Management Team 7.1 Emergency Incident Command & Control 8.1 Emergency Contacts
98C(1) (j)	11.3 Notification of employees and other site personnel	7.1 Emergency Incident Command & Control 8.1 Emergency Contacts
98C(1) (k)	Diagrams 1, 2 and 4	5. Site Profile 5.2 Site Boundaries 5.3 Surrounding Land Use
98C(1) (l)	8. Comprehensive Emergency Response Plan	Kurnell ERP (whole)
98C(1) (m)	13. Staff Training	6.10 Training, Testing, Exercises
98C(1) (n)	Appendix A. Log of Plan Tests	11.4 Post Incident Assessment
98C(1) (o)	Appendix Y Document Stewardship	2.0 Distribution List
98C(1) (p)	14. Testing of Plans	6.10 Training, Testing, Exercises 11.4 Post Incident Assessment
98D(1)	12. Availability of Plans	2.0 Distribution List
98D(2)	12. Availability of Plans	2.0 Distribution List
98E(1)	14. Testing of Plans 15. Reporting	2.1 Controlled Hard Copies 2.2 Electronic Copies
98E(2)	14. Testing of Plans	6.10 Training, Testing, Exercises

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