Pollution Incident Response Management Plan for Coonamble Public Pool

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Table of Contents

Introduction

Council has prepared this plan as required by the *Protection of Environment Operations Act 1997* (PoEO Act). This legislation stipulates that all holders of environment protection licenses must prepare a plan in order to manage pollution incident responses. The plan must be prepared in a form detailed in the associated Regulation and be kept on the premises to which the license relates.

1.0 Objectives

The objectives of this Pollution Incident Response Management Plan (the Plan) are:

- To ensure comprehensive and timely communication about a pollution incident to staff at the premises, other Council staff as appropriate, the Environment Protection Authority (EPA), other relevant authorities and the community that may be affected by impacts of the incident
- Minimise and control risk of a pollution incident by identifying risks and developing planned actions to manage those risks
- Ensure that this Plan is effectively implemented by trained staff, identifying persons responsible for implementing it, and regularly testing and reviewing it to ensure that it is current and suitable.

2.0 Definition of a Pollution Incident

A pollution incident is defined in s147 of the PoEO Act 1997 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.

3.0 Description and Likelihood of Hazard

Hazards relevant to this Plan were ranked using the matrices provided below. The process involved firstly ranking the consequence and likelihood of the hazard and then cross referencing the score with the risk assessment matrix to assign a risk level: High, Moderate, or Low.

Example:

A particular hazard could have minor safety implications but have a moderate but reversible short-term environmental impact with remediation estimated to cost around $2M. Residents are largely unaffected. Therefore the consequence rating is 3 (as the environmental/economic factors ranked highest).

As the event is considered unlikely to happen (possibly because of regular monitoring etc.) then the rank for likelihood is D.

Cross-referencing with the risk assessment matrix gives a hazard rating of 3D a risk level of ‘Low’.

Step 1. Assess Consequence and Likelihood of the Hazard

Consequence					Likelihood	
Rank	**Safety**	**Environmental**	**Economic**	**Social**	**Rank**	**Likelihood**
1	Multiple Fatalities (>100)	Disastrous environmental impact, remediation not possible	>$50M cost	Significant Regional Impact (>10000 residents)	A	Almost certain to happen
2	Major Fatalities (10-100)	Serious environmental impact with medium term effect, major remediation	$5-50M cost	Minor impact on entire region (>10000 residents) and significant impact on local area (>2000)	B	Likely to happen
3	Fatalities (1-10)	Moderate, reversible environ. impact, short term effect, moderate remediation	$1-5M cost	Minor impact of local area (>2000) and significant impact on several residents (>100)	C	Could happen occasionally
4	Serious Injuries	Minor, reversible environmental impact, requiring minor remediation	$0.25-1M cost	Minor impact on several residents (>100) and some impact on residents (>10)	D	Unlikely to happen
5	Minor medical treatment	Negligible, reversible environmental impact, requiring very minor/no remediation	less than $0.25M	Minor impact on residents (>10)	E	Extremely rare to happen

Step 2. Assign Risk Level based on Hazard Rating

		Likelihood				
		A	B	C	D	E
Consequence	1	High	High	High	Moderate	Moderate
	2	High	High	Moderate	Moderate	Low
	3	High	Moderate	Moderate	Low	Low
	4	Moderate	Moderate	Low	Low	Low
	5	Moderate	Low	Low	Low	Low

Hazard Identification and Risk Level

Hazard Description	Hazard Rating	Risk Level
Chemical Spill	3D	Low
Gas Leak	3D	Low

4.0 Pre-emptive Actions to be Taken

The following pre-emptive actions shall be implemented to mitigate the hazards identified above.

Hazard Description	Pre-emptive Action
Chemical Spill	1. Spill kits on-site 2. Bunding constructed around storage area. 3. Fire extinguishers located at entrance/exits to storage area 4. Chemical SDS updated regularly 5. Fire extinguishers checked and maintained annually by accredited person 6. Staff to be trained in use of appropriate fire extinguisher
Gas Leaks	1. Respirators on site. 2. Staff trained in the use of respirators. 3. Chemical SDS and SWMS updated regularly. 4. Gas Alarm installed in Chlorine Shed. 5. Chlorine shed located in the remotest vicinity of the facility. 6. Storage area is well ventilated.

5.0 Inventory of Potential Pollutants

The table below details the potential pollutants kept at this site.

Potential Pollutant	Max. Possible Quantity	Storage Details
Chlorine Gas	900ltrs	Gas cylinder located in chlorine shed north western area of facility
Hydrochloric Acid	200ltrs	Storage room underneath Grandstand
Soda Ash		Storage room northern end of Grandstand

6.0 Safety Equipment

This section details safety equipment at the facility and its location. Appropriate Safety Data Sheets (SDS) and their locality are also registered here.

Safety Equipment	**Location**
Respirator	Lifeguard office
Gas Alarm	Chlorine Shed

Hazardous Material	**SDS No.**	**Locality**
Chlorine Gas		Lifeguard Office
Hydrochloric Acid		Lifeguard Office
Soda Ash		Lifeguard Office

7.0 Contact Details

The following lists key personnel responsible for actioning this Plan and managing the response to a pollution incident. Also listed are contact details of relevant authorities that must be notified immediately (meaning promptly and without delay) in order if an incident occurs.

Council Key Personnel		
Name	**Title**	**24-hour contact**
Peter Hurst	SNR Technical Officer	0427271922
Bruce Quarmby	DDUCS	0427221449

Other Notification Numbers	
Police Ambulance Fire and Rescue	000
EPA	131 555
Dubbo Base Hospital – Public Health Officer (Office Hours) (After Hours)	(02) 6885 8666 0418 866 397
WorkCover	13 10 50
Coonamble Shire Council	(02) 68271 900
NSW Fire and Rescue	1300 729 579

8.0 Communicating with Neighbours and the Local Community

In the event of a pollution incident the level of communication with the community will vary depending upon the nature of the incident. Mechanisms for contacting the community for each identified hazard are provided below.

Hazard Description	Level of Consultation	Method of Communication
Chemical Spill / Gas Leak	Localised/District/Regional	• Local Community Radio 91.9 • Regional Radio – 2WEB , 2DU , ABC • Door Knock • Letter box drops • Phone • Council Facebook Page • Council Website

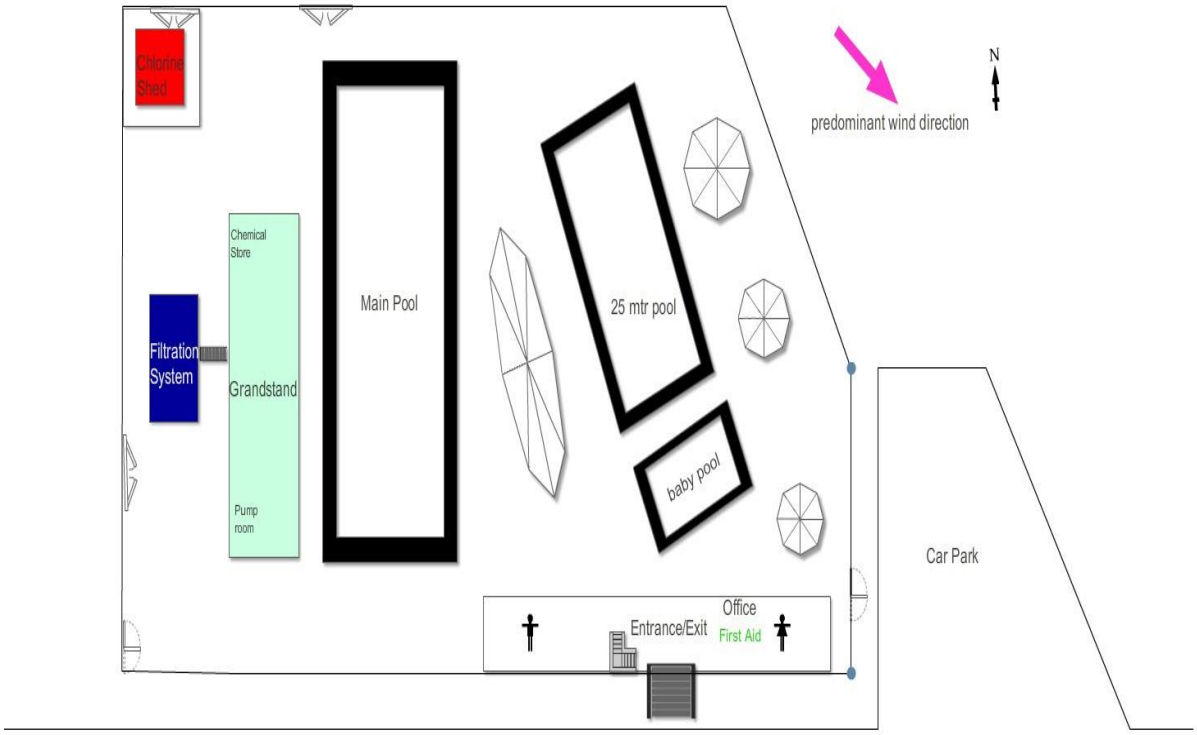
9.0 Minimising Harm to Persons on the Premises

Procedures to prevent harm to persons at the facility as a result of a pollution incident are detailed in this section. These persons may include employees, members of the public or contractors.

Procedures for identified hazards are:

Hazard Description	Action
Gas Leak	• Use P/A system to announce all patrons to leave the pool • Identify the evacuation point for all patrons to congregate • Ring Ambulance and request assistance to examine and convey patients to hospital
Chemical Spill	• Use P/A system to announce all patrons to leave the pool • Identify the evacuation point for all patrons to congregate • Ring Ambulance and request assistance to examine and convey patients to hospital

10.0 Maps



11.0 Actions During or Immediately After Pollution Incident

This section of the Plan details specific response measures that are to be actioned to contain the magnitude of pollution during and after an incident. Measures are linked to the hazards identified in Section 3.0.

Hazard Description	Action
Chemical Spill / Gas Leak	1. Don protective clothing and safety apparatus if chlorine. Sound alarms and if possible notify relevant agencies 2. Isolate source of pollution wherever possible. 3. Contain the pollution wherever possible 4. Call Hazmat / fire brigade if chlorine (if possible include this process in step 1). 5. Notify Senior Council Management. 6. Notify relevant statutory authorities under 148 of POEO Act 1997. 7. Communicate with affected neighbours and community through measures outlined in section 8 of this plan. Reassure community that the matter is being dealt with appropriately. 8. Ensure formal all clear is given before resuming normal operations 9. Undertake any remedial action as required.

12.0 Staff Training

All staff entering this facility are required to be inducted on the content of this Plan. Staff should be familiar with the hazards and associated procedures should a pollution incident occur. Staff should also be familiar with sections of the Plan and how to quickly find contacts and other information such as the location of safety equipment.

This Plan should also be reviewed annually in consultation with staff to ensure that the level of training is commensurate with the risk rating and that the Plan remains current and suitable. The table that follows outlines training appropriate to this facility and this Plan.

Item	Action	Timeframe
Introduction to this Plan	Induction	Upon commencement
Review of this Plan	Toolbox meeting	Annually
Review of SWMS	Staff meeting	Annually
Fire Extinguisher Training	RTO	Annually

13.0 Access to this Plan

A copy of this Plan is located Lifeguard Office, administration complex, Coonamble Pool Complex. The Plan is also available from Council website at www.coonambleshire.nsw.gov.au at a prominent location

14.0 Testing Plans

This Plan must be tested once every 12 months to ensure that the information contained within is accurate and up to date and that the Plan is effective. All aspects of this Plan should be tested.

There are two usual methods for testing. These include desktop simulations which should assist in undertaking a review of this Plan as outlined is Section 13.0. The second method is practical simulations or drills. These will assist in identifying practical shortfalls of the Plan and provide opportunities for improvement. The testing regime for this plan is provided below:

Item	Date	Method
Stocktake of Potential pollutants	Annually	Inspection
PIRMP for Pool	Annually	Desktop Simulation
PIRMP for Pool	2 – 3 years	Simulation exercise with LEMC

15.0 Implementing this Plan

This Plan shall be implemented if a pollution incident occurs as defined in Section 2.0. The person(s) responsible for implementing this Plan is identified in Section 7.0.