

Plan

EPS-ENV-PLN-002



Eraring Power Station Pollution Incident Response Management Plan (PIRMP) – EPL1429

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Contents

1. Introduction	3
2. PIRMP Reference Table	4
3. Document Control	11

1. Introduction

This plan has been developed in accordance with the requirements of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, which commenced on 29th February 2012, hereafter referred to as the Amendment.

One of the requirements of the Amendment is that 'Pollution Incident Response Management Plans' or PIRMPs be prepared by the holders of environment protection licences in relation to the activities carried out under such licences. In particular, it specifies the additional information that is required to be included in a plan, the manner in which it is to be made available to stakeholders and the occasions on which it is to be tested.

This PIRMP for Eraring Power Station (EPS) references existing Origin Energy incident response documentation and provides a summary outlining how the existing documentation satisfies each requirement in the Amendment. The PIRMP has been developed for Environmental Protection Licence 1429.

2. PIRMP Reference Table

The table below summarises the existing documentation Origin maintains which satisfies the requirements of the Amendment in relation to PIRMPs:

Document reference numbers are provided within the Document Control Table in Section 3.

Clause No. of Amendment	Requirements	Relevant Origin Energy Documentation
98b (2)	<p>Form of plan</p> <p>(1) A plan is to be in written form. (2) A plan may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document.</p>	<p>This document will be the PIRMP. It will reference existing documentation to satisfy the requirements.</p>
98c (note)	<p>Additional matters to be included in plan</p> <p>The note refers to Section 153C (a-c) of the Act. The plan must include the following:</p> <p>153C (a) The procedures are to be followed... in notifying</p> <ul style="list-style-type: none"> - Owners or occupiers of premises in the vicinity of the premises; - The local authority; - Persons or authorities required to be notified. <p>153C (b) Detailed description of actions to be taken after pollution incidents to reduce or control pollution.</p> <p>153C (c) Procedures for coordinating action and communication.</p>	<ul style="list-style-type: none"> • Guidance on who is required to be notified for different levels of emergency response is given Section 3, 4 & 5 of the EPS Emergency Response Plan). • Section 6.5 of the EPS Emergency Response Plan details contact numbers of adjacent facilities. • Appendix 12.5 of the Emergency Response Plan lists those parties (both internal and external) that may need to be contacted in the event of an incident. • Section 6 of the EPS Emergency Response Plan details initial response in the event of an emergency. • Section 6 of the EPS Emergency Response Plan mentions environmental response to incidents – detailed information on responding to reducing/controlling pollution in the event of an incident can be found in the Environment Emergency Response Scenarios (Appendix 12.11 of Emergency Response Plan).

Clause No. of Amendment	Requirements	Relevant Origin Energy Documentation
		<ul style="list-style-type: none"> • Checksheets for Site Communicators and Scene Controllers are provided in the EPS Emergency Response Plan Appendices (Section 12).
98c	<p>Additional matters to be included in plan</p> <p>(1) General The matters required under section 153C (d) of the Act to be included in a plan are as follows:</p> <p>(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity)</p> <p>(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood</p> <p>(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</p> <p>(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity</p>	<ul style="list-style-type: none"> • The Origin Risk Database (accessed through the Origin intranet) lists environmental hazards relating to licensed activities. • The EPS Environmental Management Plan outlines key aspects and impact for the site and how these are managed. • The Origin Risk Database lists the likelihood of hazards occurring, before and after controls have been put into place. • Where significant risks have been identified in the Origin Risk Database, Corrective Actions are developed to minimise the likelihood of an incident occurring. • Origin maintains an ISO14001:2015 certified Environmental Management System for EPS, which is available on the Origin Intranet. • Appendix 12.8 &12.9 of the EPS Emergency Response Plan) and the Dangerous Goods Manifest (list all dangerous goods on site (which represent many of the most serious potential pollutants), as well as the location at which they are stored and the maximum quantities.

Clause No. of Amendment	Requirements	Relevant Origin Energy Documentation
		<ul style="list-style-type: none"> • Inventories for air, water, and fugitive pollutants are maintained annually for EPA Annual Returns, NPI and NGERS reporting (this includes the EPS ash dam). • Chemwatch provides additional MSDS information and safety and environment considerations for most substances on site. • The EPS Emergency Response Plan for EPS lists significant environmental aspects relating to potential pollutants.
	(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	See (d) above.
	(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	<ul style="list-style-type: none"> • The EPS Environmental Management Plan lists the resources available for responding to environmental incidents (Section 12)
	(g) the names, positions and 24-hour contact details of those key individuals who: <ul style="list-style-type: none"> (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 	<ul style="list-style-type: none"> • The EPS Emergency Response Plan states that the ‘Scene Controller’ is the duty Shift Manager (0409 917 391). Therefore this person is responsible for activating the plan and managing the response to a pollution incident. • The EPS Emergency Response Plan also mentions a ‘Site Communicator’ who is identified as an Operator communicating with external agencies during emergencies. • Section 12.5 of the Emergency Response Plan provides contact details for key individuals. • Appendix 12.19 states that the Eraring Power Station Manager (Group Manager Eraring Operations) is responsible for notification of pollution incidents as per section 148 of the Act.

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	(h) the contact details of each relevant authority referred to in section 148 of the Act	<ul style="list-style-type: none"> The EPA contact details and Fire and Rescue details are included in Appendix 12.5 of the Emergency Response Plan and the relevant Environmental Emergency Response Scenarios (Appendix 12.11). Appendix 12.19 of the EPS Emergency Response Plan outlined a protocol for notifying regulators of pollution incidents.
	(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	<ul style="list-style-type: none"> Section 6.5 of the EPS Emergency Response Plan states that the Site Communicator is responsible for advising adjacent facilities (businesses) of incidents. Section 6.7 outlines a protocol for media briefings. The external 'controlling authority' for incidents, normally the NSW Police or Fire Brigade, are responsible for sending out SMS updates to the community for pollution incidents.
	(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	<ul style="list-style-type: none"> Section 12.13 of the EPS Emergency Response Plan provides details of site evacuation procedures where there is a significant risk to employees.
	(k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises	<ul style="list-style-type: none"> Appendix 12.10 of the EPS Emergency Response Plan lists the drawing numbers of all of the items in (k). Chemwatch gives details of the locations of potential pollutants, through the Level 2 database search. Maps are located in repositories around site in the vicinity of potential pollutants. The Vault system is an electronic repository for any site maps, including stormwater layout. EPA Licence 1429 Premises Plan outlines all licenced discharge points.

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	(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	See responses for Sections 98c (c), (i) and (k) above.
	(m) the nature and objectives of any staff training program in relation to the plan	<ul style="list-style-type: none"> Section 7 of the EPS Emergency Response Plan details Emergency Response training for general staff and contractors, and staff who have roles identified in the Emergency Response Plan, such as Operators and OHS Staff. Operators have specific Emergency Response Training (see OHS007 Course Outline), OHS Staff have first aid training, and all other staff and contractors are briefed on their roles and responsibilities in the general site induction. Some training specific to environmental emergency response is also available in Environment Training and Boom Deployment Training, as outlined in Section 9 of the EPS Environmental Management Plan
	(n) the dates on which the plan has been tested and the name of the person who carried out the test	<ul style="list-style-type: none"> The EPS Emergency Response Plan states in Section 2 that the Group Manager Eraring Operations is responsible for ensuring the adequacy of the Emergency Response Plan. Testing of the Plan is delegated to the EPS Health and Safety Manager to coordinate.
	(o) the dates on which the plan is updated	<ul style="list-style-type: none"> The EPS Emergency Response Plan (Section 8 details a Plan Review Cycle, which includes periodic reviews entered into the WMS system, as well as post incident review. This plan and the EPS Emergency Response Plan contain document control detailing dates of updates.

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	(p) the manner in which the plan is to be tested and maintained.	<ul style="list-style-type: none"> • EPS Emergency Response Plan Section 8 details the format of testing and plan maintenance.
98d	<p>Availability of plan</p> <p>(1) A plan is to be made readily available:</p> <p>(a) to an authorised officer on request, and</p> <p>(b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who's responsible for implementing the plan.</p> <p>(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:</p> <p>(a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan,</p> <p>(b) if the person does not have such a website—by providing a copy of the plan, without charge, to any person who makes a written request for a copy.</p> <p>(3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:</p> <p>(a) section 153C (a) of the Act:</p> <p>153C (a) The procedures (that) are to be followed... in notifying</p> <ul style="list-style-type: none"> - Owners or occupiers of premises in the vicinity of the premises; - The local authority; - Persons or authorities required to be notified. <p>and</p> <p>(b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).</p> <p>(4) Any personal information within the meaning of the <i>Privacy and Personal Information Protection Act 1998</i> is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).</p>	<ul style="list-style-type: none"> • The PIRMP is available on the intranet, internet and in the Origin Document Management System. • A copy of the PIRMP will be located at Eraring Power Station Main Gate (Security). <ul style="list-style-type: none"> • The PIRMP is available on the intranet, internet and in the Origin Document Management System. <p>See Section 98c (h) and (i) above.</p> <ul style="list-style-type: none"> • The PIRMP is publicly available. Personal information will not be included in the PIRMP.

Clause No. of Amendment	Requirements	Relevant Origin Energy Documentation
98e	<p>Testing of plan</p> <p>(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.</p> <p>(2) Any such test is to be carried out:</p> <p>(a) routinely at least once every 12 months, and</p> <p>(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.</p>	<ul style="list-style-type: none"> • The EPS Health & Safety Manager is responsible for carrying out annual tests of the plan with the approval of the Group Manager Eraring Operations. It outlines that internal exercises are undertaken every year, with full scale internal/external exercises every 2 years. • Testing requirements are detailed in the Emergency Response Plan Section 8. • Tests are also carried out with 1 month of a pollution incident occurring. • The plan was last tested on 29/10/2019 by the Senior Environment Business Partner and ash dam team.

3. Document Control

Author (To Whom any changes are to be recommended)			
Position		Incumbent	
Senior Environment Business Partner		Gemma Dobson	
Stakeholders and other contributors			
Position		Incumbent	
Reviewed by			
Position		Incumbent	Review date
Approved by			
Position		Incumbent	Approval date
Senior Environment Business Partner		Gemma Dobson	25/08/2020
History			
Date	Author	Version	Nature of change
27/06/2012	Gemma Dobson Neil Williams	1.0	Document created.
17/08/2012	Peter Harvey	2.0	Changes to reflect review of Emergency Response Plan and Incident Management Plan.
25/10/2012	Gemma Dobson	3.0	Clarification of which EPLs are covered by this PIRMP.
30/06/2013	Gemma Dobson	4.0	Reviewed with no changes made – waiting on generator sale transaction
31/05/2014	Gemma Dobson Neil Williams	5.0	Change details from Eraring Energy to Origin Energy, change references to Incident Management Plan
19/05/2015	Gemma Dobson	6.0	Update position titles, review document references to Emergency Response Scenarios
23/06/2016	Matthew Quinn	7.0	Updated PIRMP following EPA Audit – Changed section references, updated plan testing, aligned with ERMP.
15/10/2016	Matthew Quinn	8.0	Updated and Reviewed after Ash Dam Incident.
12/01/2016	Matthew Quinn	9.0	Updated and EPL 4297 Removed from PIRMP
06/12/2018	Gemma Dobson	9.1	Minor Change – Controlled document changed from EPS-EMT-PLN-001 to EPS-

			ENV-PLN-002 – Updated test details and references to latest ERP revision
30/06/2020	Gemma Dobson	9.2	Minor Change – updates following change to new Document Management System and updates to testing dates.
Related Documents			
Title			Document ID
Eraring Power Station Emergency Response Plan			35204622
Environmental Management Plan			30816164
EPL1429 Premises Plan			35015144
Review Requirements			
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