

8. Emergency & Security Management

8.1.11 Pollution Incident Response Management v9.1

16/04/2020

Document History

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1 Purpose

1.1 Introduction

This Pollution Incident Response Management Plan¹ has been prepared to comply with the requirements under Part 3A Clause 98D(2) & 98D(3) of the Protection of the Environment Operations (General) Regulation 2009.

A Pollution Incident Response Management Plan must be prepared for all holders of an Environment Protection Licence (EPL).

Extracts of this document have been made available to meet the requirements of Clause 98D(2) and are made available on the Transdev Sydney Ferries website "Beyond The Wharf".

Under the Act, the relevant authority for the Balmain Shipyard is the Environmental Protection Authority (EPA).

1.2 Scope

The aim of the PIRMP is to provide an easily interpreted reference document that ensures pollution incidents can be managed and responded to in an appropriate manner. The PIRMP is applicable to all facets of Transdev Sydney Ferries operations and describes how incidents relating to pollution will be managed.

1.3 Objectives

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about the pollution incident to the:
 - Transdev Sydney Ferries and sub-contractor personnel.
 - Environmental Protection Authority (EPA).
 - WorkCover NSW.
 - Fire and Rescue NSW.
 - Leichardt Council.
 - Neighbours outside the facility that may be affected by the impacts of a 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 the plan is implemented by:
 - Trained personnel with responsibility for implementing the plan.
 - Regular testing for accuracy, currency and suitability.

¹ This document is a summary of the full plan and is published for information of Transdev customers, stakeholders and the general public.

1.4 Glossary of Terms

Officer in Charge

Means the Duty Manager, or GM Assets who are responsible for responding to and managing any emergency situation on a Vessel, wharf and Balmain Shipyard.

Emergency Management Team

Means a working team consisting of key personnel who are responsible for the development of procedures and guidelines for staff who are operating under the EMP.

Emergency Operations Centre

Means a facility established at the incident source from which the Officer In Charge exercises control in relation to all incidents. This is the point where coordinating agency heads assemble to receive and disseminate information and make operational decisions on the immediate rescue operation

Emergency Management Centre

Means a facility established by Transdev Sydney Ferries' from where the EMT exercises control in relation to major, significant and/or reportable incidents.

Hazardous Materials

Means materials which, without adequate safeguards, may contaminate the environment to immediate or subsequent detriment of that environment or human society and which includes all dangerous goods.

Incident

Means the actual or imminent occurrence of an event which:

- Endangers or threatens to endanger the safety or health of Sydney Ferries' staff, passengers or members of the public; or
- Destroys or damages, or threatens to destroy or damage, any Sydney Ferries' property;
- Being an event, which requires immediate action and a coordinated response. Incidents may either be a crisis or a disaster; or
- Being an event, which causes or threatens to cause pollution or harm to the environment.

Response

Means the process of combating an emergency and of providing immediate relief for persons and assets affected by the emergency.

1.5 Table of Abbreviations

BERP	Balmain Shipyard Emergency Response Plan
EMC	Emergency Management Centre
EMP	Emergency Management Plan
EMT	Emergency Management Team
ERT	Emergency Response Team
EOC	Emergency Operations Centre (Site Control)
EOT	Emergency Operations Team (Site Control)
EPA	Environmental Protection Authority
GRN	Government Radio Network
OIC	Officer in Charge
SHEQMS	Safety, Health, Environmental Quality Management System

1.6 EOT Organisational Structure

The role of the EOT is to provide an emergency operations structure so that the organisation can effectively respond to incidents which may occur at Sydney Ferries. The EOT addresses the need for incident command onsite, internal and external communications with stakeholders and coordination of resources.

The structure of the Emergency Operations Team (EOT) is as follows:

Role	Position	Alternative holder(s)	Activation responsibility/action
Officer in Charge	GM Assets	Duty Manager	Authority to Activate the Emergency Response plan on all incidents. Responds on-site for all incidents Assumes control on-site for all incidents Activate the Emergency Management plan on all major incidents and significant incidents with a potential to be major incidents
Area Warden	Supervisors	Supervisors	Authority to Activate the Emergency Response plan on all incidents Responds on site to all major and significant incidents Assumes on-site control until the arrival of the officer in Charge

Role	Position	Alternative holder(s)	Activation responsibility/action
			Assumes on-site control of all routine incidents Advises Marine Engineering Manager on all incidents
Wardens	Shipyard Supervisors	Senior SRT's and / or SRA's	Assist with the implementation of the emergency response plan Responds to all incidents as directed when on-site Assumes on-site control of routine incidents Advises Production Supervisors on all incidents
EOT Recorder	Administration Assistant – Shipyard	Stores Co-ordinator Supervisor	Co-ordinates the set up and establishment of the EOC Maintain a current activity log

During emergency situation, wardens shall be identified by the use of coloured safety helmets as follows:

- Area Warden – yellow helmet
- Wardens – red helmet

2. Description of Likelihood and Hazards

Overall hazards and risk for the Project are determined through Transdev Sydney Ferries Risk Management Framework and reflected in its Risk Register. Workplace Health and Safety (WHS) application is detailed within Balmain Critical Procedures Manual, Trade Wastewater Treatment Plant Manual and Fleet Generic Operations Manuals.

2.1 Hazard and Risk assessment

Assessing hazards and risk on a work task level, are managed through the Job Safety Environmental Analysis (JSEA) Procedure. This procedure identified hazards associated with a work task and develops solutions for each hazard that either eliminates or controls such hazards. This is commonly referred to as the Take 5 process.

2.2 Evaluation Criteria & Risk Rating

The qualitative measures are used to estimate the consequence or impact of an event, along with the estimate of likelihood, to produce consistent risk rankings across the identified risks. This process is defined in 2.2.1 Risk Assessment Manual. An extract of the manual with the matrix is below.

Environmental	Safety	C	Severity	Risk					
				Incredible	Improbable	Remote	Occasional	Probable	Frequent
Irreparable damage to an ecosystem	Multiple fatalities	C6	Catastrophic	6	12	18	24	30	36
Major spill, long term damage to local environment	1 fatality or multiple major injuries	C5	Disastrous	5	10	15	20	25	30
Major spill, medium term damage to local environment	1 permanent disability (major injury) or multiple serious injuries	C4	Critical	4	8	12	16	20	24
Minor spill, short-term damage to local environment	1 serious injury or multiple minor injuries	C3	Major	3	6	9	12	15	18
Insignificant spill, easily contained, little or no harm to local environment	1 minor injury	C2	Minor	2	4	6	8	10	12
Negligible spill, no harm to local environment, no requirement to contain	Illness, 1st Aid treatment or injury not requiring treatment	C1	Negligible	1	2	3	4	5	6
Target Actions				Incredible	Improbable	Remote	Occasional	Probable	Frequent

3. Pre-Emptive Actions

3.1 Preparedness and inspections

The key to effective prevention of pollution incidents is regular inspections, continuous review of procedures and risk assessments. Mitigation strategies include:

- Provision of spill and containment kits at regular intervals and regular inspections.
- Activity specific and daily risk assessments.
- Review and development of work procedures and safe work method statements in consultation with relevant work teams, Safety & Assurance team members and senior management.
- Daily inspections of active work areas.
- Completion of routine environmental checklists.
- Internal and external audits on Environmental compliance.
- Community notification of major and construction updates.

3.2 Training and drills

To ensure the workforce is ready to respond to pollution incidents, regular drills and specific training occurs. The training is to ensure that when required, an ERT and EMT can be established to and effectively respond as required. Deployment of the spill boom to test the serviceability and to aid with ensuring crew competency. Toolbox talks on spill kit use and incident response to convey critical information and raise awareness.

The BERP is to be tested and emergency drills conducted as follows:

- An annual drill is to be held to test the response capability of the Balmain Shipyard to a major incident. This drill is to encompass yard evacuation, testing of alarms and deployment of spill booms (smaller local spills and larger containment bom).
- Response drills will be done monthly and will include at least one of the following:

- Unlawful Act;
- Bomb Threat – Telephone/ Written;
- Discovery of Unattended Property;
- Environmental Incident – Spills;
- Fire / Explosion;
- General Evacuation;
- Person(s) in Water;
- Person(s) Injured;
- Unlawful Seizure / Robbery; and
- Vessel Alongside Emergency.

3.3 Evacuation

Detailed information on the evacuation procedures to be followed in the event of an incident / emergency are contained within 8.1.2 Balmain Shipyard Emergency Response Plan.

4. Inventory and Safety Equipment

4.1 Inventory

Transdev Sydney Ferries operated Balmain Shipyard stores, handles and uses a large number of chemicals in maintenance and operations and has a comprehensive system for safe handling of such chemicals. This system includes, but is not limited to:

- Hazardous Chemicals Register and Manifest.
- Safety Data Sheets (SDS).
- Procedures for the approval of new chemicals on site.
- Procedures for safe storage and use of these chemicals.

The Shipyard is audited periodically via internal and external stakeholders. To meet the requirements of the Act, continuous monitoring of the Hazardous Chemicals Register and Manifest is undertaken, with amendments made as required.

4.2 Safety Equipment

The GM Assets must ensure all required emergency equipment is available at and is appropriately located and maintained in good working order. An equipped first aid room is located in the main office block. Each workshop has a first aid kit which must be inspected periodically and kept full stocked.

The GM Assets is responsible for ensuring availability of an adequate stock of consumable equipment and ensure all emergency equipment is being inspected, tested and maintained as necessary.

4.2.1 Emergency Control Equipment

The yard spill containment boom is the primary containment control for major spills to the harbour. The yard spill boom is to be deployed in the event local spill kit booms snakes / sausages are not adequate to contain a spill. Deployment of the spill boom is to occur at least twice a year and when testing of the PIRMP. Procedures for deployment of the spill containment boom is contained in **Appendix A**.

Equipment required to manage a first response for a hydro-carbon spill to water must be located at the start of each wharf. This equipment is in addition to the oil and general spill response kits strategically located within the Shipyard workshops and yard area.

Spill response kits are located in strategic locations within the Shipyard precinct (see **Appendix A**). These kits are held in wheeled bins, and contain materials suitable for small hydrocarbon spills on land as well as providing back up to the first response equipment listed above.

The spill kits are stationed at the following locations:

Location	Spill kit (number, size & type)
BSY Wharf 3	1 x 660 litre - Floating booms. 2 x 15m containment booms. 2 x 240 litre – Marine spill kits. 1 x 240 litre – Floating booms. 1 x 240 litre – Hydrocarbon spill kit.
BSY Wharf 2	1 x 660 litre - Floating booms. 2 x 240 litre – Marine spill kits. 1 x 240 litre – Floating booms. 1 x 240 litre – Hydrocarbon spill kit.
BSY Wharf 1	1 x 660 litre - Floating booms. 2 x 240 litre – Marine spill kits.
Fuel pod end of Jetty 1	1 x 240 litre – hydrocarbon spill kit.
Trade Waste Plant	2 x 240 litre – hydrocarbon spill kit.
Paint Store (Depot 3)	1 x 120 litre HAZCHEM spill kit.
Store Apron	2 x 240 litre – hydrocarbon spill kit.
Fitters / Machining / Refit	1 x 240 litre – hydrocarbon spill kit.
Plumbers / Boilermakers / Shipwrights workshop	1 x 240 litre – hydrocarbon spill kit.
Battery Store	1 x Wall mounted battery spill kit.

5. Contacts and Communication

5.1 Contacts

Any large-scale spill to harbour that is unable to be contained by spill kit contents, Sydney Ports are the primary responders. Call 000 if the incident presents an immediate threat to human health or property. If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the **following order**:

- Balmain Shipyard - 02 8622 9685
- Transdev Sydney Ferries Control – 02 8113 3004
- Harbour Control Emergency Line (Sydney Ports) – 02 9296 4000
- Fire and Rescue NSW – phone 000
- NSW Environment Protection Authority Environment Line on – 131 555
- Local Public Health Unit – (Royal Prince Alfred Hospital) – 02 9515 6111
- WorkCover NSW – 13 10 50
- Leichhardt Council – 02 9367 9222
- Sydney Harbour Foreshore Authority – 02 9240 8500
- RMS – 02 9563 8511
- Sydney Water Police – 02 9320 7499

5.2 Communication Systems

The means of communication during an incident will vary, depending upon the location and nature of incident. For the purposes of managing an incident, it is important to have both primary and alternate means of communications with the incident site and EOC. The following details provide an established means of internal communications during an incident.

5.3 Telephones

Mobile phone devices and fixed landlines are to be used to form part of the communication platform.

5.4 Radios

- Operations channel Primary channel 7D
- Emergency channel Primary channel 8D

5.5 Emergency Channel Operation

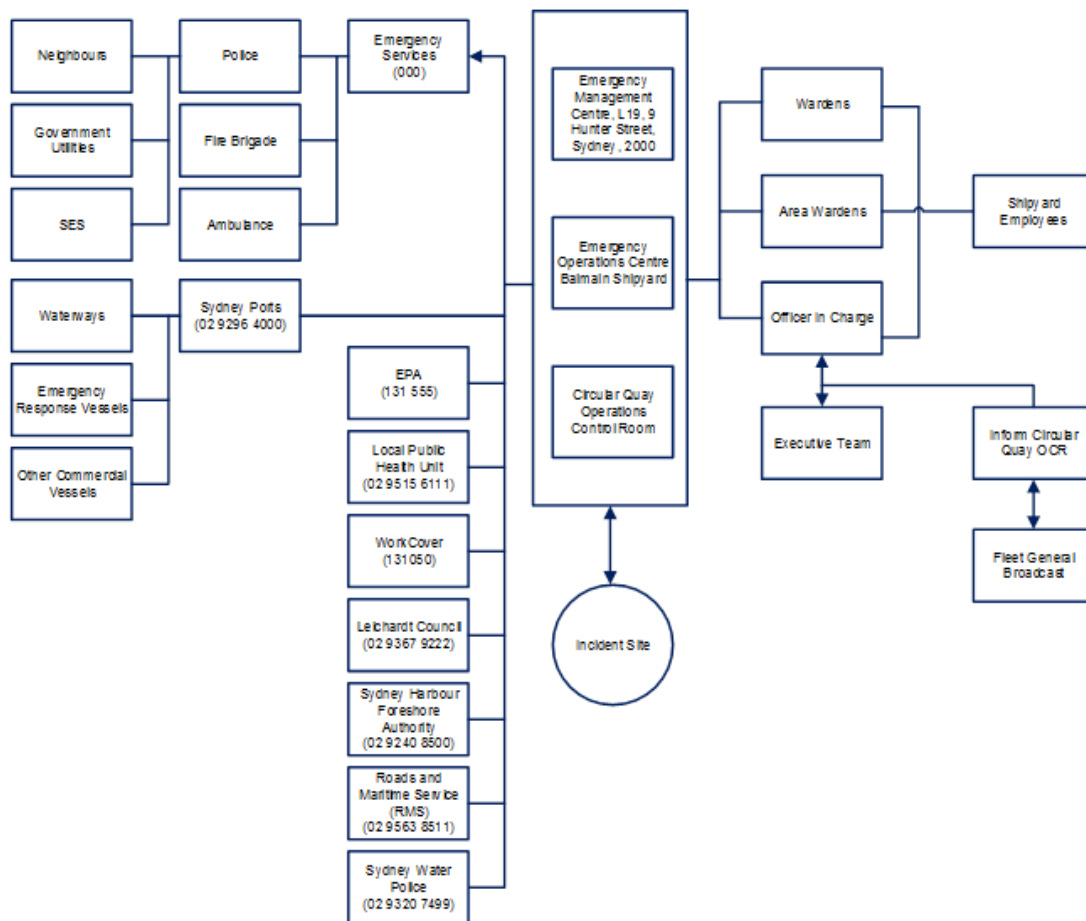
In the event of any significant or major incident the Balmain Shipyard Safety Office will issue a direction to all Balmain Shipyard Wardens (response personnel) to switch from the operations Channel 7D to the emergency Channel 8D for the duration of the incident. Once staff have switched to the emergency channel, they need to conduct a radio check to ensure all parties have communications.

The direction to switch back to the operations Channel 7D will be issued by the Balmain Shipyard Person in Charge.

Note: During a bomb threat incident CED (current emitting devices, mobile phones / radios) cannot be used within minimum 50 meters of the suspected device. Therefore, a runner or telephone landline will have to be utilised to convey information.

5.6 Communication Plan

The communications plan will be implemented during every significant and major incident. However, the extent to which external stakeholders will be notified of an incident will be contingent on the incident category, type and location. It must be remembered that communication is integral to the success of any incident response; therefore, all affected stakeholders must be contacted at the earliest possible opportunity. Assistance may be required in the EOC to ensure all internal/external stakeholders are contacted (e.g. any available staff to undertake phone communications).



5.7 External Notifications

Under Part 5.7, of the Act, all incidents that cause actual or potential material harm to the environment shall be reported to the relevant authority. Any employee that in conduct on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority.

Notifications to the relevant authorities shall be performed by the GM SHEQ, GM Assets or delegate. Any request for information that is received by any other staff should be directed to the Emergency Management Team Leader. All employees are to cooperate with any direction from the regulatory authority following a pollution incident.

5.8 Neighbours

The Balmain Shipyard is nestled within a residential community. In the event that an incident with an offsite impact occurs or an event that may be of concern to neighbours, the NSW Police Force and/or Fire and Rescue NSW will engage with the local community to provide information on the event. For any work that occurs outside of the normal operational parameters of the shipyard, neighbours are notified via written correspondence posted to their home addresses. All other routine operational work does not attract additional notification.

5.9 Noise Complaints

The Balmain Shipyard is subject to an Environmental Protection Licence. All work conducted shall be within the defined parameters. Due to the nature of works, there is noise associated with operations at the Shipyard, however, every effort to mitigate noise shall be taken. Management will take all reasonable and practicable actions to resolve any complaints regarding operations at the Shipyard. Concerns can be directed to 02 8622 9685.

5.10 Emergency Operations Reporting

In the event of an incident the collection, recording and dissemination of information is essential so that accurate and up-to-date decisions can be made at all levels.

The incident log is the primary method of recording all information and action taken. For major incidents the log is kept in the EMC and for significant incidents the log is kept in the Emergency Operations Centre (Sheriff's Office) and completed by the person assigned with the duties of the 'recorder'.

The GM Assets is responsible for ensuring that all incident reports and log sheets are collected following an incident. All reports are to be kept and forwarded to the Transdev Sydney Ferries document controller for commencement of an incident file.

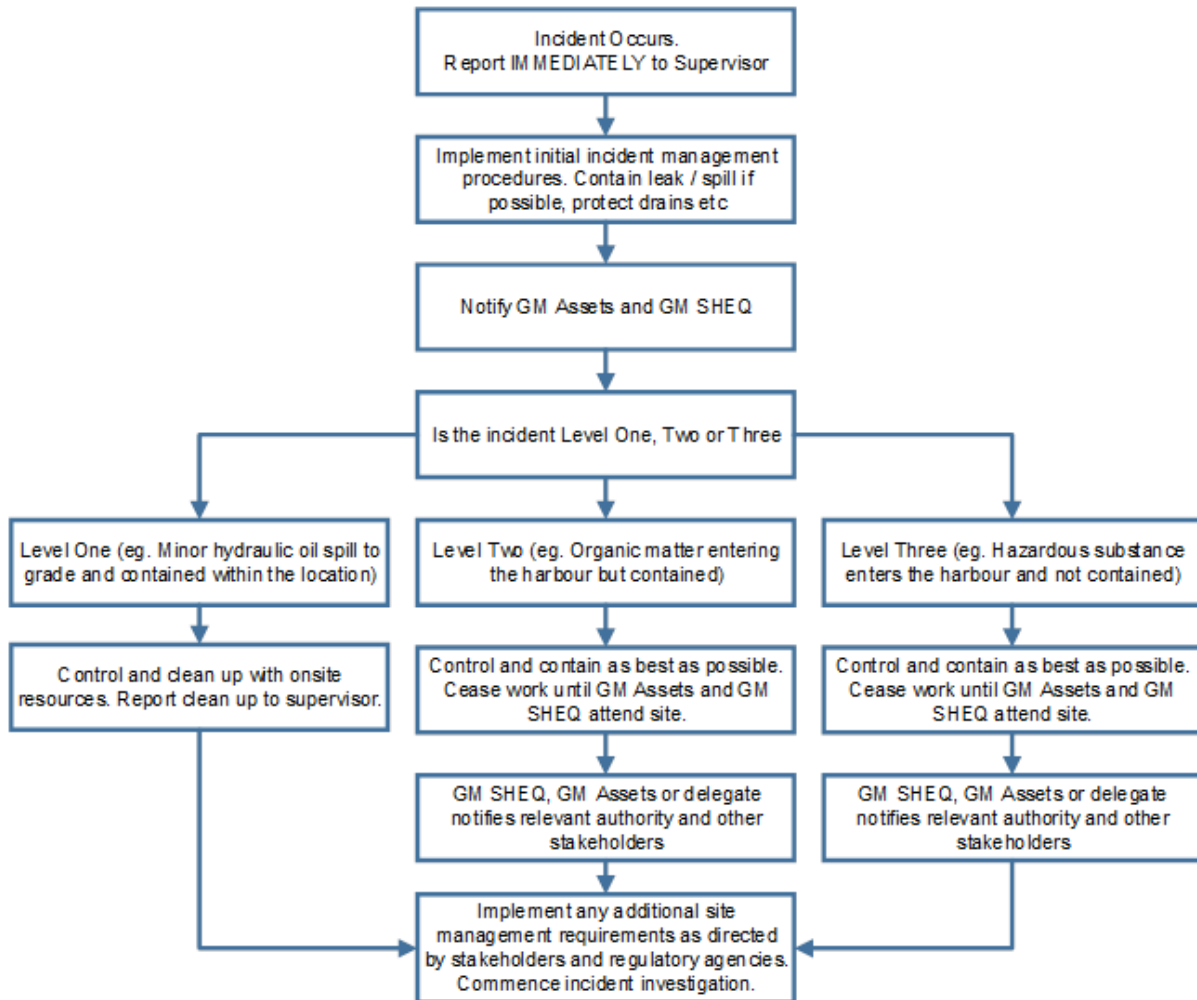
5.11 Map

The Balmain Shipyard Dangerous Goods Plan the highlights storage locations and quantities. This is to be used as an indicative guide as to the locations and the maximum quantities that can be stored. The actual quantity on-site varies at any given time

6. Pollution Incident Response Procedures

6.1 Immediate Actions and Notifications

In the event of a pollution incident, follow response and notification procedures detailed below.



	Action	Responsibilities	Comments
1	Stop further leaks / spills.	Person causing / finding leak.	If leak from drum, reposition drum so leak is uppermost. If leak from pipe, close valve etc.
2	Inform supervisor.	Person causing / finding leak.	Stop any traffic through and isolate the area.
3	Determine severity of the leak.	Supervisor.	For major leaks notify GM Assets and GM SHEQ.
4	Form barrier / bund around leak / spill.	Supervisor / Work Crew.	Use spill kit contents. If spill to harbour deploy spill boom.
5	Stop the spreading of leak.	Supervisor / Work Crew.	If possible, transfer contents from compromised storage container to alternate container.
6	Put barrier / bund around drains / outlets.	Supervisor / Work Crew.	Barricade / bund drains and grates using sandbags / boom socks etc.
7	Obtain oil spill kit and apply oil absorbent on spill.	Supervisor / Work Crew.	Use absorbent material or equivalent.
8	Clean-up / remove absorbent material to bin.	Supervisor / Work Crew.	Use appropriate cleaning solution to remove remaining contaminate.
9	Commence incident investigation.	Tech Super / Engineering Manager	Record incident and review procedures.