

Narellan Field Service Centre (EPL 13025)

Pollution Incident Response Management Plan

Prepared by Endeavour Energy Sustainability and
Environment
Version 11





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1. Introduction

1.1 Background

An environment protection licence (EPL) (licence number 13025) was established by Endeavour Energy in 2009 for the Narellan Field Service Centre (FSC). The licence is regulated by the NSW Environment Protection Authority (EPA) and is required under the *Protection of the Environment Operations Act 1997* due to the volume of waste oil that can potentially be stored at the Narellan FSC.

In 2012, the *Protection of the Environment Operations Act 1997* was amended and the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012* was gazetted. One of the outcomes of this amendment was a requirement for all holders of an environment protection licence to prepare and implement a pollution incident response management plan.

The pollution incident response management plan must:

- be kept at all times at the premises;
- include information as required in the amendment;
- be tested on an annual basis; and
- be implemented if a pollution incident does occur.

Endeavour Energy has prepared a Risk Assessment for Emergencies at Narellan FSC. This pollution incident response management plan supports the Risk Assessment by providing additional guidance on the response and reporting of pollution events.

1.2 Objectives

The objectives of the pollution incident response management plan are to:

- provide guidance on responding to a pollution incident, such that potential harm to the environment and humans is minimised; and
- ensure timely and correct reporting of a pollution incident.

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2. Site Information

2.1 Site Address and Description

The Narellan FSC is located at 17 and 19a McPherson Road, Smeaton Grange, NSW, 2567.

The site is currently an operational FSC for Endeavour Energy with typical activities including truck and equipment storage, office tasks, mechanic workshops, and oil storage and handling.

2.2 Surrounding Land Uses

The Narellan FSC is located within the Smeaton Grange Industrial Park. The land uses surrounding the site are industrial and commercial in nature. There is a Caltex Service Station located approximately 200 metres to the south east of the site.

2.3 Surrounding Sensitive Environments

Narellan Creek is located directly west of the site, while Annan Creek (tributary of Narellan Creek) is located approximately 60 metres to the north. Stormwater drainage outlets leaving the site are connected to Annan Creek. Annan Creek joins into Narellan Creek 180 metres north of the site, which flows further north west through Harrington Park then eventually flows south-west into the Nepean River. The junction of Narellan Creek and Nepean River is 5.3 kilometres south-west of the site.

The nearest residential property to the site is located 160 metres to the south.

The nearest school is the Madgalene Catholic High School, located 250 metres west of the site.

2.4 Environmental Hazards and Pollutant Inventory

2.4.1 Environmental Hazards

The primary environmental hazard at Narellan FSC is associated with the storage of oil and the potential for containment failures and consequent loss of oil to the surrounding environment. It is noted that all oil containment facilities were constructed in 2009 in accordance with Australian Standard 1940:2004 (The Storage and Handling of Flammable and Combustible Liquids) and Endeavour Energy’s internal design standards. As such, the likelihood of containment failure is considered to be, as low as reasonably practicable.

Factors which may increase the likelihood of a containment failure are the use of unqualified contractors and equipment deterioration (e.g. bund integrity). However, these factors are controlled by:

- Only contractors licensed by the EPA undertake the unloading of waste oil from the 20 kL waste oil tanks; and
- the depot bunds are inspected for integrity issues (e.g. cracks) every six months.

2.4.2 Pollutant Inventory

The Narellan FSC includes the following oil storage and handling facilities:

- 2 x 20,000 L above ground tanks (in bunded areas) used for storing waste transformer oil;
- bunded areas for storage of 205 L and 1,000 L oil drums; and
- bunded areas for storage of transmission and distribution transformers.

A list of the pollutants and maximum quantities that may be stored at the Narellan FSC, and the approximate locations of each pollutant is detailed in **Table 2.1** below.

Table 2.1- Inventory of pollutants

Pollutant	Maximum Quantity ¹	Location
Transformer (insulating) oil	80,000 L ²	The above ground storage tanks are located in a covered bunded area in the south west corner of the site. Transformer oil is also contained in transformers which are periodically stored at the site in the uncovered bunded areas in the western portion of the site and the south east corner of the site.

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Pollutant	Maximum Quantity ¹	Location
Hydraulic oil, transmission fluid, engine oil, anti freeze, gearbox and diff oil	2,000 L ³	These are stored in drums on either bunded pallets in the mechanic workshop, or in the bunded vehicle wash bay located adjacent to the mechanic workshop.
Gas cylinders (LPG, oxyacetylene, SF ₆)	15 bottles	Adjacent to the truck garage (see Figure 1)
Asbestos (waste)	1 x 1,100 L bin	Bin storage area located in the western portion of the site.
Mercury (in waste fluoro light globe bins)	240 L wheelie bins	Bin storage area located in the western portion of the site.
Lead acid (in waste batteries)	1 x pallet load	Stored on covered bunded pallet in the bunded vehicle washbay.
Silica gel beads (waste)	1 x 200 L drum	Stored in lined 200L drum near store.

Notes:

- 1- Quantities indicated in Table 2.1 above are maximums only, and actual volumes will vary.
- 2- The quantity of transformer oil being stored at the site can vary greatly based on the number of transformers stored in the bunded area in the south west corner of the site. The maximum capacity was reduced to 40,000 litres in 2016.
- 3- The quantity of each type of oil being stored in the mechanic workshop will vary depending on stock at any one time.

In addition, **Figure A** details the approximate location of the pollutants potentially present.

2.5 Off-site hazards

Given the licensed facility is located in an industrial area; it is possible that neighbouring sites handle dangerous goods or explosive materials. However, it is considered unlikely that a potential pollution incident at the Narellan FSC would impact these facilities or set off a pollution incident from these facilities. In the event of a fire or explosion, notification of neighbouring properties is to be considered as detailed in Section 3.5 of this PIRMP.

3. RESPONDING TO POLLUTION INCIDENTS

3.1 Health and Safety

Before responding to a pollution incident, health and safety risks are to be identified and assessed by Endeavour Energy employees and contractors (where relevant). A site-specific risk assessment has been developed and shall be followed in the event of an emergency. The emergency risk assessment, forms part of the emergency management plan and is available in the Endeavour Energy Emergency Evacuation Response Folder which is retained on-site at all times. If the site is required to be evacuated because of a pollution event, evacuation procedures and muster points are detailed in the Emergency Evacuation Response Folder.

Safety Datasheets (SDS) for relevant chemicals are retained in the Endeavour Energy Chemwatch Database and stored on-site in the store cabinet.

3.2 Pollution Control Measures

Preventive and mitigation controls established at Narellan FSC include:

- bunds equipped with oil water separators exist around major oil storage areas, such as around the above-ground storage tanks and dedicated storage areas for oil-filled equipment (eg transformers);
- spill kits are located around the FSC in proximity to oil storage areas;
- a sluice gate is installed in the stormwater outlet leaving the site, which allows the stormwater outlet to be closed in the event of a spill.

3.3 Spill Response

3.3.1 Spill response procedure

Endeavour Energy Company Environmental Management Standard EMS 0008 *Environmental incident response and management* provides guidance on incident response procedures. This procedure is summarised in the flowchart on the following page (**Figure 3.1**).

Endeavour Energy has spill response teams that are available at any time to assist with spills that are beyond the capabilities of site personnel to control and clean up. The Endeavour Energy spill response teams can be mobilised by calling the Call Centre (13 10 03) as specified in the incident response flowchart (**Figure 3.1**).

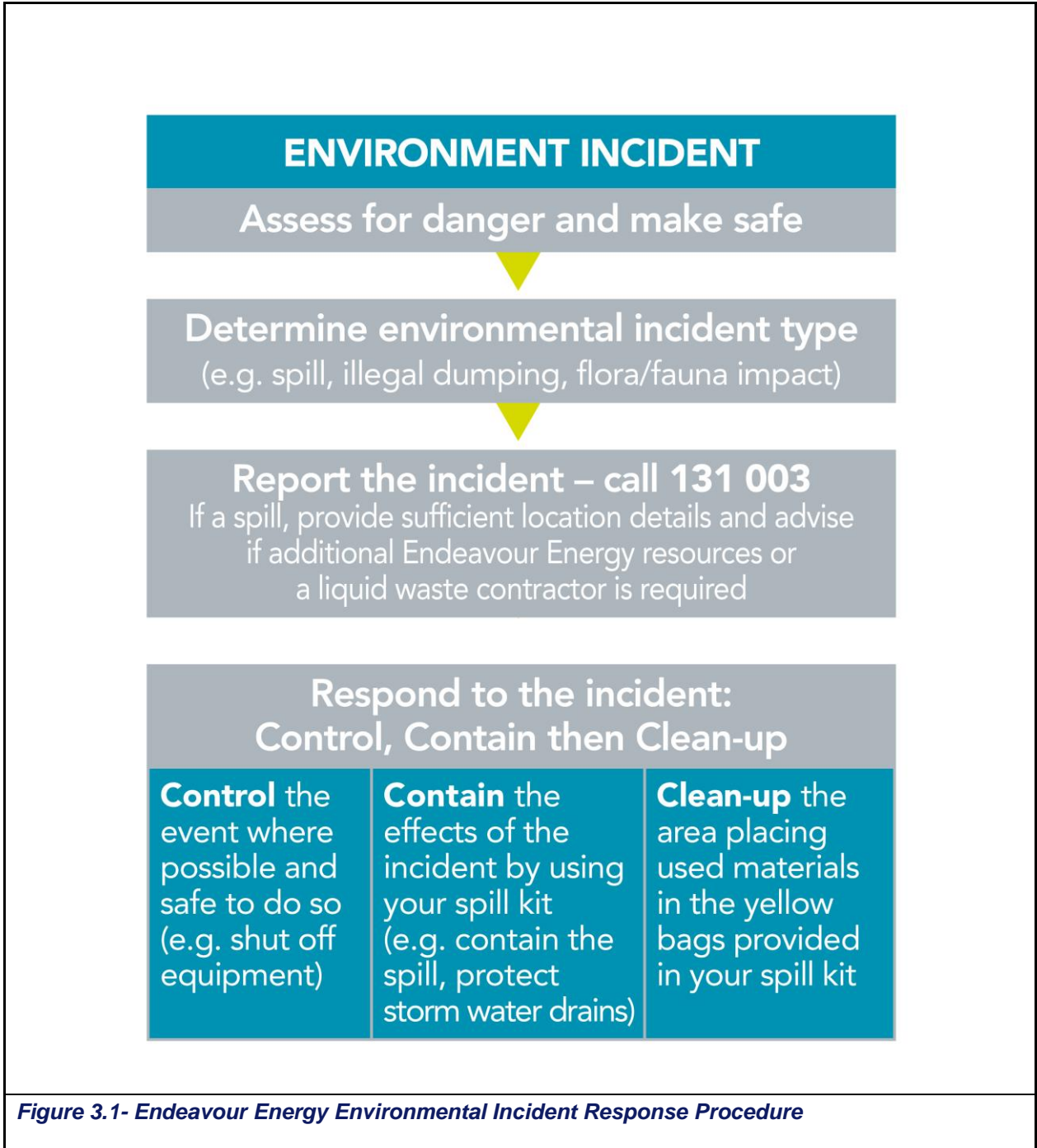
Materials contained in on-site spill kits should be used by site personnel to control, contain and clean up a spill. If a spill does occur, priority should be made to protecting the stormwater drains to ensure the spill does not migrate into the drains. The location of the stormwater drains are shown on **Figures B and C**. Stormwater drainage outlets leaving the site are connected to Annan Creek. If the spill does migrate into the stormwater drains, then refer to Section 3.3.2.

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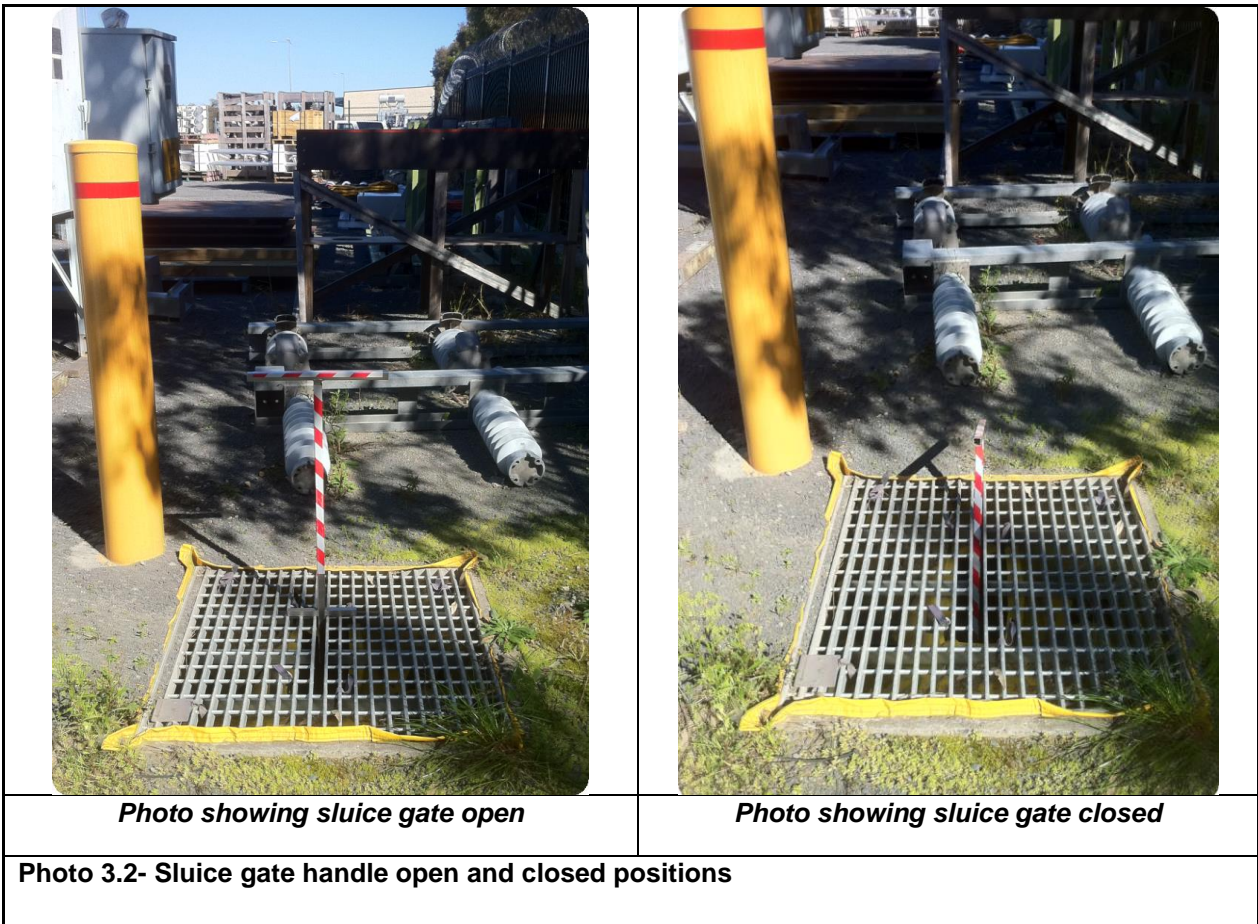
Photo 3.1- Photo showing onsite spill kits

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3.3.2 Sluice Gate

The loss of pollutants to stormwater may be prevented by the timely closure of the stormwater sluice gate. This gate is located in the discharge pipe at the northern corner of the Narellan FSC (near the site exit) as shown on **Figure C**. Timely closure of the sluice drain will prevent the spill from migrating off-site. **Photo 3.2** below shows the sluice gate handle in the open and closed positions.



3.3.3 Recovery of spill

Following containment of the spill, a licensed liquid waste contractor should be engaged to recover the spill. Endeavour Energy has established a contract with a licensed liquid waste disposal contractor for emergency work. The licensed liquid waste disposal contractor can be mobilised by the Call Centre (13 10 03).

3.4 Contact Details

3.4.1 Endeavour Energy Contact Details

All environmental incidents must be reported to the Endeavour Energy Call Centre (131 003) as per EMS 0008 *Environmental incident response and management* (see Section 3.3.1).

Internal staff should also contact their relevant Endeavour Energy Environmental Business Partner.

Table 3.2- Emergency contact details for Endeavour Energy:

Position	Contact Phone Numbers
Endeavour Energy Call Centre	131 003

The Environmental Services Manager will undertake reporting of pollution incidents to external agencies in accordance with the POEO Act. Contact details for external agencies are provided below.

Table 3.3- Contact details for external agencies

Department	Contact Phone Numbers
Environment Protection Authority	131 555
Local Council – Camden Council	4654 7777
Ministry of Health	9515 9420
SafeWork NSW	13 10 50
Fire and Rescue NSW - Narellan	4647 7266 1300 729 579 OR 000 if required*

* Firstly, call 000 the incident presents an immediate threat to human health or property

3.5 Community Communication

3.5.1 Endeavour Energy Communications with the Community

A pollution event from the Narellan FSC may affect the neighbouring community in the following ways:

- pollution of stormwater system/creek; and/or
- smoke hazard from a fire.

Community populations that may potentially be impacted by a pollution event from the Narellan FSC include:

- adjacent industrial and commercial facilities;
- premises adjacent to the stormwater system/creeks;
- the nearest residents to the site (approximately 160 m south and 240 m east of the site); and/or
- the nearest school (Magdalene Catholic High School, located 250 m west of the site)

In the event of a pollution incident that has the potential to affect surrounding neighbours, the Endeavour Energy Corporate Communications branch should be consulted for advice on community communication. In the event of a pollution incident impacting the stormwater system, premises adjacent to the system must be notified. The relevant premises adjacent to Annan Creek are listed in Table 3.6 and shown in Figure D. These communications will be undertaken by the Environmental Services Manager, the Manager Corporate Communications and/or the Manager Sustainability and Environment.

Table 3.6- Contact details for Premises Adjacent to the Stormwater System

Company (and Figure D reference ID)	Contact Phone Numbers
Safety and Industrial Supplies (1)	4648 2622
Signs Lines'N Scrolls (2)	4647 6722
Narellan Truck Wash (3)	4647 6066
U-Wreck (4)	4628 1000
Multispares Truck Parts (5)	4628 1000
WOMA Australia (6)	4648 2311

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3.6 Testing of Pollution Incident Response Management Plan

In accordance with the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*, this Pollution Incident Response Management Plan must be tested annually.

Sustainability and Environment will manage the testing of this Plan. Testing may involve a “mock” spill event at the Narellan FSC or a desktop “mock” exercise. A record will be maintained of test events in accordance with **Appendix A**.

In the unlikely event of a pollution incident, this plan must be tested within one month of the incident occurring.

3.7 Staff Training

A tool box talk will be completed with relevant staff located at Narellan FSC annually as part of the testing of the management plan. The toolbox talk will include instruction on the location and use of spill kit materials in accordance with the incident response flow chart, and instruction on the sluice gate. A record of toolbox talks will be maintained in accordance with **Appendix A**.

In addition, an internal factsheet summarising the requirements of this Plan will be laminated and provided to Endeavour Energy vehicles that are involved in the oil handling process.

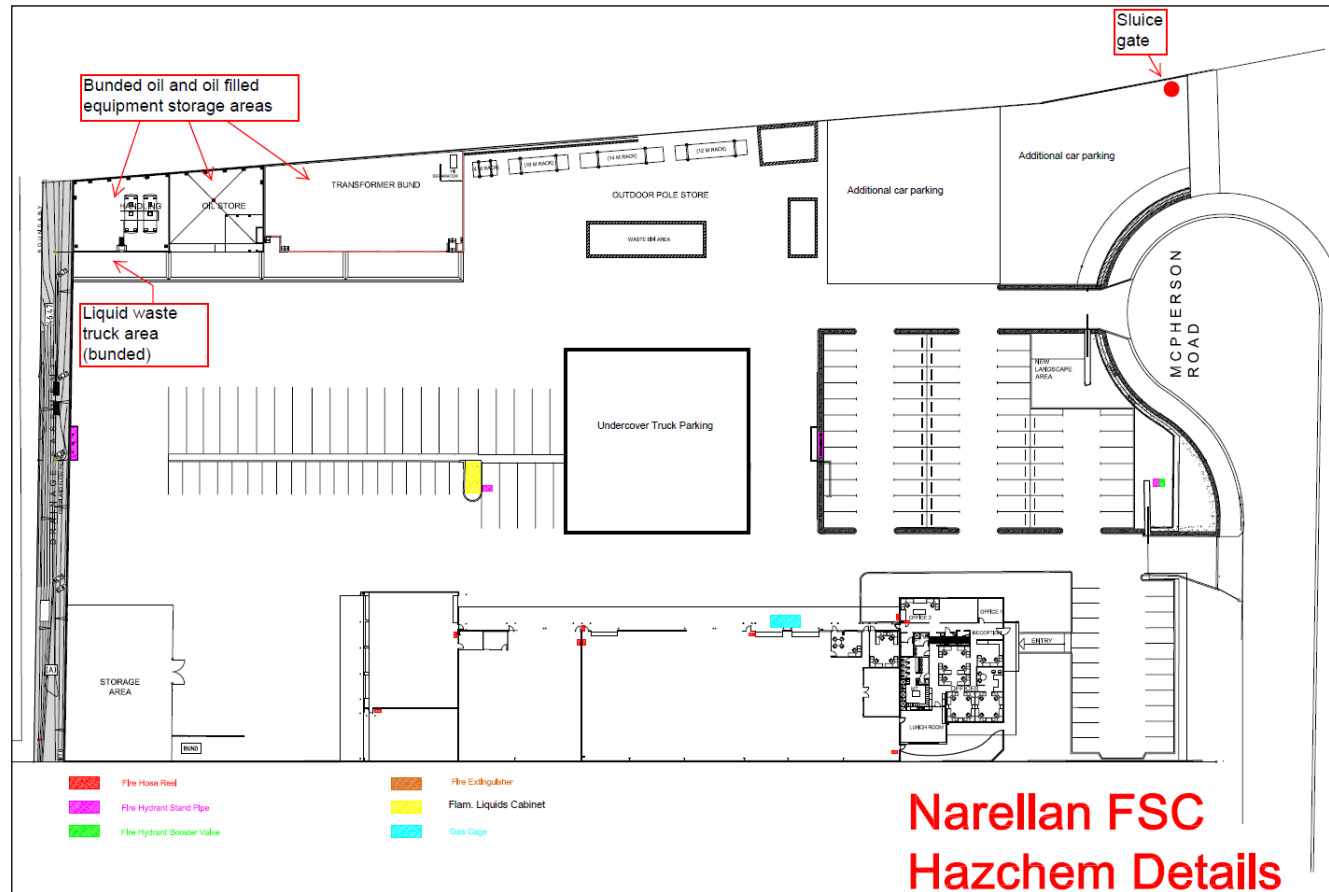


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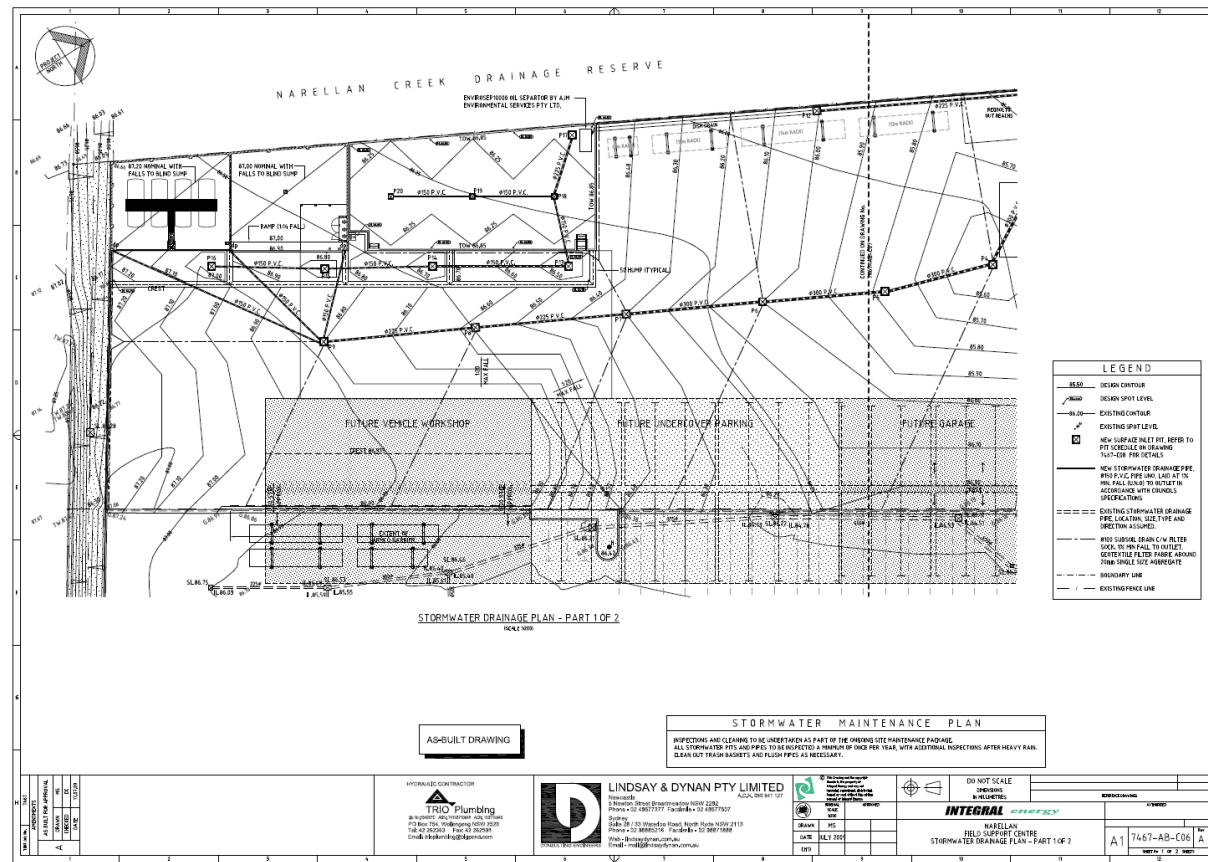
Figure A- Hazchem Details



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Figure B- Stormwater Drainage Plan (1 of 2)

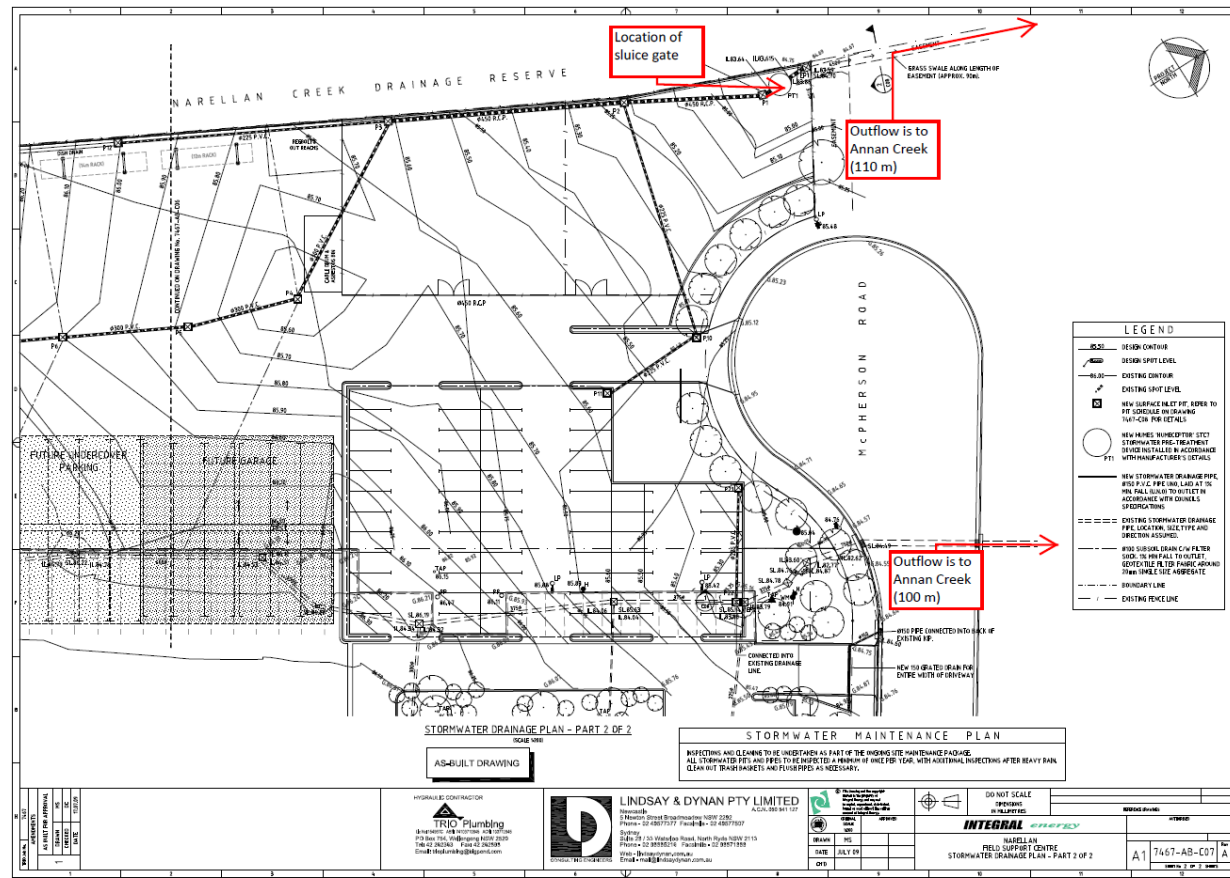


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Figures

Figure C- Stormwater Drainage Plan (2 of 2)



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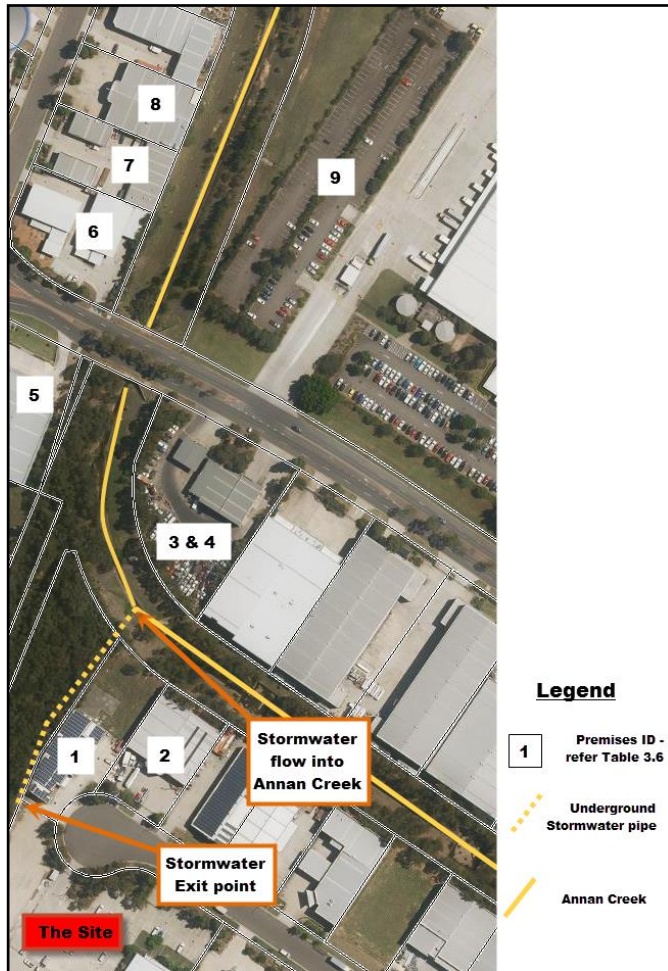


Figure D- Premises adjacent to stormwater system

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Appendix A

Appendix A- Records of Testing Events

Records of Testing Events		
Date of Testing Event	Names of staff member who carried out the testing	Signatures of staff member who carried out the testing
12-1-23	Andread Ventura	<i>AV</i>
12-1-23	PAT COOPER	<i>PC</i>
12-1-23	Corey Lutman	<i>CL</i>
12-1-23	Gavon Cra	<i>G</i>
12-1-23	RICK SMITH	<i>RS</i>
12-1-23	Marling Smith	<i>MS</i>
12-1-23	Dylan Moulbray	<i>DM</i>
12-1-23	Ben Mounsey	<i>BM</i>
12-1-23	PETER TOWNSEND	<i>PT</i>
12-01-23	Timothy Brown	<i>TB</i>



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