

Plan

NSW Rolling Stock Operations and Waste Transportation - Pollution Incident Response Management Plan (PIRMP)

EPL 21364 and EPL 21836

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Purpose

This Pollution Incident Response Management Plan ('PIRMP') has been prepared in accordance with section 153A of the *Protection of the Environment Operations Act 1997* (POEO Act). The document provides pollution response details for both EPL 21364 and EPL 21836.

Pacific National Pty Ltd ('**PN'**) is the holder of Environmental Protection Licence 21364 (**EPL 21364**). Pacific National's operates rolling stock operations across NSW on Licence Rail Networks defined as:

'A continuous or connected length of track greater than 30 kilometres that is operated by the same person in New South Wales.'

In addition, Pacific National Services Pty Ltd ('PN') is the holder of Environmental Protection Licence 21836 (EPL 21836). Pacific National transports Category 1 and Category 2 trackable waste (specifically 'soils contaminated with a substance or waste referred to in Part 1, Schedule 1 of the *Protection of the Environment Operations (Waste) Regulation 2014* (N120)) within, and outside of the state of New South Wales (NSW). The transportation of Category 1 and Category 2 trackable waste within, and outside of NSW is a Scheduled Activity under Schedule 1, Part 2(48) of the POEO Act.

If a pollution incident occurs in the course of an activity undertaken whilst performing operations regulated by EPL 21364 and 21836, so that material harm¹ to the environment is caused or threatened, the person carrying out the activity must **immediately** implement this plan. Figure 1 provides guidance on the activation of the plan.

This PIRMP relates to activities and operations, including the transportation of Category 1 and Category 2 trackable waste within the defined boundaries of a **Licenced Rail Network** and applies to all employees, contractors, sub-contractors, and visitors.

Approved by:	Signature:
Position Title: Environmental Manager	Date: 20 July 2024

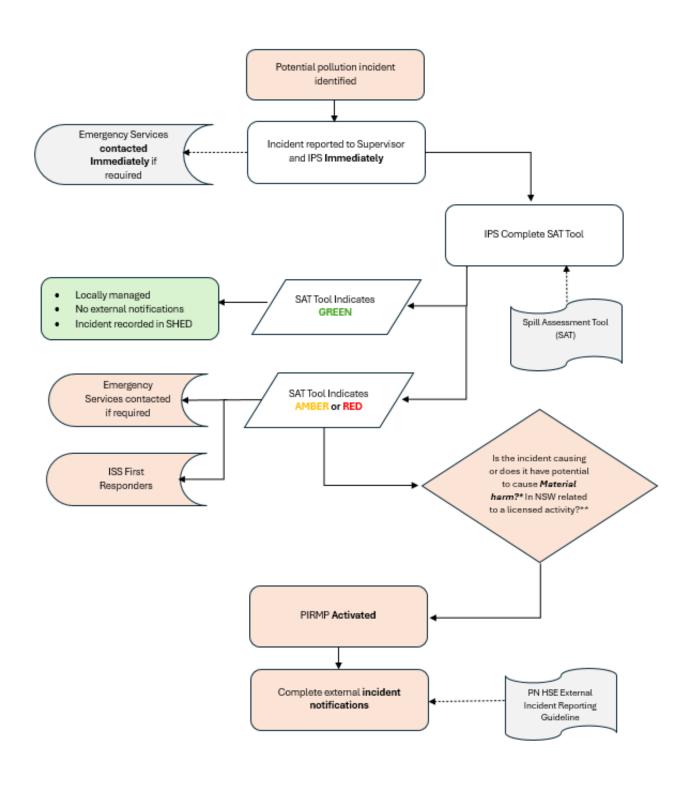
Note: loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

¹ An incident is determined to be of Material Harm, 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 \$10,000.00) (or such amounts as is prescribed by the Regulations).





^{*}Material harm as defined on Page 2 of this PIRMP

Figure 1: PIRMP Activation

^{**}Rollingstock operation on the NSW Rail Network and / or trackable waste transportation in NSW



Environmental Protection Licence Details

Details	EPL 21364	EPL 21836	
Name of Licensee	Pacific National Pty Ltd	Pacific National Services Pty Ltd	
	ABN 39 098 060 550	ABN 48 052 134 368	
EPL No.	21364	21836	
License Address	Level 1, 2 Blue Street North Sydney NSW 2	2080	
Company or business contact details	Primary Site Telephone Number: 02 8484 8000		
	Name:		
	Position or title: Environmental Manager		
	Contact Email:		
	Name:		
	Position or title: Head of Legal		
	Contact Email:	<u>u</u>	
Website Address	Pacific National - Australia's recognised leader for rail freight solutions		
Scheduled Activity	Railway Activities – rolling stock operations	Transport of Trackable Waste	
Fee Based Activity	Rolling stock operations	Transport of Category 1 trackable waste	
		Transport of Category 2 trackable waste	



Pollution Incident – person/s responsible

Details	EPL 21364	EPL 21836
PIRMP Activation	The relevant BU Operational I	Manager and/or HSE or Environment Manager can activate the PIRMP
Notifying relevant authorities	•	nning Services (IPS) are responsible for notifying relevant authorities of a pollution appropriate Operational, Planning and HSE managers determine that activation is
Managing Response to pollution incident	The person responsible for ma Business Unit involved.	naging the pollution incident will be determined by the nature of the incident and the
Pacific National Integrated Planning Services:		



Notification of Relevant Authorities

Details	EPL 21364	EPL 21836		
Responsibility	IPS are responsible for notifying relevant authorities of a pollution incident after consultation with appropriate Operational, Planning and HSE managers determine that activation is required.			
Fire and Rescue NSW/Rural Fire Service	Contact number/s:	For Emergency (000) For notification of non-urgent event 1300 729 579		
EPA	Contact number/s:	131 555		
NSW Health	Relevant Area Health Service: this can be determined by accessing https://www.health.nsw.gov.au/Infectious/Pages/phus.aspx			
SafeWork NSW	Contact number/s:	13 10 50		
Local authority/s		this can be determined by accessing https://www.olg.nsw.gov.au/public/find-my-council/local-undaries-and-mapping-information/		
Any other identified organisation or agency requiring notification		If an environmental incident involves soils contaminated with a substance or waste listed under the Regulation,		
Notification Documentation	IPS will record all not	ifications with the Incident Record		

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Local Community and Neighbourhood Notification and Communication Procedures

EPL 21364 EPL21836 Details

PN's operations cover multiple rail networks with an extensive geographical footprint. Density of private and public receptors over this area and availability of exposure pathways to a potential incident varies significantly.

Due to likely probability of limited PN resources on the scene during an incident involving rolling stock (i.e. limited to the train operators), all community notification will be performed in consultation with, and where available assistance from emergency services.

Communication methodology will be determined on a case-by-case basis that considers the types and locations of neighbouring landowners who may require information, the nature of the incident and the stage of incident response.

PN Representation for communication information will be on an incident-by-incident basis and can be provided by PN IPS on

Actions to be taken during or immediately after a pollution incident

Details	EPL 21364	EPL21836	
Action Plan:	•	n immediately to mitigate against further potential and/or actual material hare ppropriate deployment of containment materials and infrastructure appropri do so.	
	Where safe to do so, personnel in re	sponse to an event shall:	
	• Stop, Identify and Assess – S	Safety is the first priority.	
	 Identify the source of the spil 	or leak;	

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Details	EPL 21364	EPL21836	
	If safe to do so – secure, isolate and mitigate further potential environmental harm.		
	All incident responses are to be undertaken in consultation with internal subject matter experts, the network oper and emergency services and regulators as required.		
ISS National Spill Response	up. ISS First Response provious incident management and sponsets and other services. If	First Response to assist in specialist emergency response, containment, and incident cleandes an emergency response call centre service and provides full time emergency response, ecialist response services such as deployment of vacuum trucks, transportation of controlled PS will engage ISS First Response to provide specialist response services where required perintendent / Supervisor as the nominated contact person. Contacting ISS does not negate services if required.	
Coordinating with Authorities	PN Representation for comm	unication information will be on an incident-by-incident basis and can be provided by PN	

Pre-emptive actions to be taken

EPL 21364 EPL21836 Details

Pacific National transports a variety of materials and products on behalf of its customers, that may include dangerous and hazardous goods, or wastes defined as trackable as authorised by EPL 21836. Products and materials will be loaded into shipping containers or holding vessels by the customer before prior to being loaded onto a Pacific National rail wagon. As such, other than unloading and loading of the containers and vessels onto rail wagons, these materials are not directly handled by PN personnel.

IPS can confirm the nature of the product within freight containers by utilising the Train Management System (TMS) and confirming details with PN Customer Team

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Staff Training

Details EPL 21364 EPL21836

Pacific National shall maintain and implement the following forms of training and education:

- Induction Packages
- Emergency response awareness training
- Workplace engagements / information releases
- Spill Response Procedure
- · Environmental incident reporting.

Testing and updating the PIRMP

Details EPL 21364 EPL21836

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment.

To assist in the undertaking of this review process a template has been developed, refer to <u>PN-FOR-ENV Pollution Incident Response Management Plan</u> Test Checklist. The Pacific National Staff member/s undertaking this review are required to:

- Complete the review template (refer to <u>PN-FOR-ENV Pollution Incident Response Management Plan Test Checklist.</u>);
- Log a version control change in the table below; and then
- Close out the relevant SHED action, attaching the completed review form.



Details EPL 21364 EPL21836

It is imperative that following any incident that has initiated the PIRMP, a debrief meeting is held with input from relevant stakeholders and those involved in the incident response. The debrief should be conducted no greater than two weeks after the completion and rectification of the incident. The purpose of the debrief is to identify and confirm:

- Which processes worked well
- Opportunities for improvement
- Any changes to the PIRMP, EMP and/or associated tools and resources, including training and competency.

The testing and updating (as required) of the PIRMP may be performed in coordination with the debrief meeting.

Testing Log:

Date Tested	Tested by	Record Number	Туре
10 July 2024	(Environmental Advisor) (Environmental Advisor)	SHED ID 2024071057	Scenario – waste spill at Picton EPA Ref 01186538



Related Documents

RELATED DOCUMENTS	
Legislation	Protection of the Environment Operations Act 1997 Protection of the Environment Operations (General) Regulation 2021 EPL 21364 – Rolling Stock Operations EPL 21836 – Waste Transportation
Policy	Health Safety and Environment Policy
Procedure / Standards	PN-STD-SAF Environmental Management Standard
Supporting Documents	PN-GUI-HSE External Incident Reporting Guideline PN-FOR-SAF Spill Assessment Tool PN-FOR-SAF Pollution Incident Response Management Plan Checklist

Revision Summary

First Issue	Issue Date	Implementation Requirements	Approved by
1.0	12/3/2021	General review / resting after PIRMP activated. Nil changes	Environment Manager

Version	Revision Date	Summary of Revision Details	Approved by
2.0	16/7/2021	General review / resting after PIRMP activated. Nil changes	Environment Manager
3.0	17/3/2022	Updated contact details	Environment Manager
4.0	28/6/2022	General review / resting after PIRMP activated. Nil changes	Environment Manager
5.0	8/9/2022	Update contact details	Environment Manager
6.0	8/6/2023	Update template in accordance with revised format. Update community notification and relevant authority details, specialist spill response, reference to SAT tool, testing and continual improvement and include appendices	Environment Manager
7.0	18/7/2023	Updated to incorporate EPL21836 and additional requirements regarding NORM material	Environment Manager
8.0	10/7/2024	Update to reformat to EPA template and incorporate testing detail to improve clarity	Environment Manager