



Division	Fuels and Infrastructure
Type	Plan
Title	Pollution Incident Response Management Plan (PIRMP) Kurnell Terminal

Pollution Incident Response Management Plan (PIRMP)

Kurnell Terminal – Redacted Version

1. INTRODUCTION

The Pollution Incident Response Management Plan (PIRMP) has been prepared for Ampol Australia Petroleum Pty Ltd - Kurnell Terminal (EPA Licence No 837), to set out specific requirements for achieving compliance with the relevant requirements introduced in the Protection of the Environment Legislation Amendment Act 2011 (POELA Act, 2011) related to timely notification and management of the pollution incidents causing “material harm”.

2. OBJECTIVES

The objectives of this PIRMP are to:

- ensure comprehensive and timely communication about the pollution incident to:-
 - Ampol and sub-contractor personnel;
 - Environmental Protection Authority;
 - NSW Ministry of Health;
 - SafeWork NSW;
 - Fire and Rescue NSW;
 - Sutherland Shire Council
 - Wider community outside the facility who may be affected by the impacts of the 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 that the plan is implemented by
 - trained personnel with responsibility for implementing the plan;
 - regular testing for accuracy, currency and suitability

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3. DEFINITIONS

Pollution Incident

An Incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.

It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Material Harm

- 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.*

For the purposes of this definition, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Environment means:

components of the earth, including:

- (a) land, air and water, and*
- (b) any layer of the atmosphere, and*
- (c) any organic or inorganic matter and any living organism, and*
- (d) human-made or modified structures and areas,*

and includes interacting natural ecosystems that include components referred to in paragraphs (a)–(c).

EPA means:

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the Environment Protection Authority constituted by the Protection of the Environment Administration Act 1991

A premise includes:

A building or structure, or (b) land or a place (whether enclosed or built on or not), or (c) a mobile plant, vehicle, vessel or aircraft.

Pollution means:

(a) water pollution, or (b) air pollution, or (c) land pollution.

Activity means:

An industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).

4. TYPES OF INCIDENTS TO BE NOTIFIED

Only those incidents which occur in the course of an activity so that material harm to the environment is caused or threatened are to be reported.

Note on exclusions:

- (a) Definition of “Pollution Incidents” excludes **Noise**;
- (b) **Odour is not required to be reported** as a Pollution Incident under Part 5.7, s.148 (7) of Protection of the Environment Operations (POEO) Act 1997.
- (c) A person is not required to notify an incident if the incident is an ordinary result of action required to be taken to comply with an Environment Protection Licence, an Environment Protection Notice or other requirement of or made under this act (s.151 of POEO Act, 1997).

5. NOTIFICATION RESPONSIBILITY

The Kurnell Terminal Operations Manager (TOM) and the National Environment Manager, Distribution (for EPA contact) have primary responsibility for calling the Agencies identified in the Key Contact list in Table 9.1. Responsibilities for statutory reporting are identified in the Ampol *Incident Notification and Investigation Standard* (CD3824).

As indicated in Section 3.3 of the Emergency Response Plan for Kurnell Terminal, the Terminal Operations Manager (TOM) is responsible for ensuring that all site personnel are trained in their roles and responsibilities with respect to execution and maintenance of this plan. This responsibility extends to all third parties entering the site, including contractors, tanker drivers and visitors whose emergency response training shall take place via the site induction.

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Following the initial notification, the Kurnell Terminal Operations Manager (TOM) is responsible for consulting with the Emergency Services, Support Agencies, external authorities and neighbouring premises in matters relating to this plan.

All site based personnel are responsible for being familiar with this PIRMP, and in particular, being fully conversant with the actions expected of them in the event of an emergency.

6. DESCRIPTION OF ENVIRONMENTAL HAZARDS

The Kurnell site's Environment Management System (EMS) is ISO14001 certified. As part of the EMS, the Kurnell site has identified the environmental aspects and impacts of its activities and has documented these in area specific risk registers, as part of the combined Environmental Aspect and Impact Register for the site. This register includes the aspects, risks and controls associated with the terminal operations, tank maintenance, and remediation project works. Identified control improvements are also included in the register, as needed.

These Registers are reviewed bi-annually, following an incident impacting environmental performance when controls were found to be inadequate and/or when there are changes to operational activities . Following are some of the environmental hazards identified:

Table 6-1 Potential Environmental Hazards - Pollution Event

Potential Initiating Conditions/ Events	Potential Risk Scenario	Remarks
In operational areas: Unauthorised hot work generating spark Sparks from unauthorised use of electrical equipment petrol driven vehicles in high risk areas	Fire and explosion	The scale, extent, duration and nature of the material relating to each of the identified risks will likely determine if the consequence is causing or has the potential to cause material environmental harm.
Failure of plant and equipment e.g. connections, valves. Loss from stored chemicals and products Procedural lapses/errors - spills	Loss of Containment to land or water -examples are uncontrolled releases of hydrocarbons waste	Licence Exceedances are not included in this plan as these are reported as per the licence reporting conditions and in the "Annual Return"

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Potential Initiating Conditions/ Events	Potential Risk Scenario	Remarks
Failure of plant and equipment e.g. wharf loading arms, during product discharge Procedural lapses/errors	Pollution of waterways during shipping discharge incident or other activity	<p>The scale, extent, duration and nature of the material relating to each of the identified risks will determine if the consequence is causing or has the potential to cause material environmental harm.</p> <p>Licence Exceedances are not included in this plan as these are reported as per the licence reporting conditions and in the “Annual Return”</p>
Failure of plant and equipment e.g. connections, valves. Stored chemicals and products loss – container failure Procedural lapses/errors	Oil/product spill requiring response	
Failure of plant and equipment e.g. loading arms, during product discharge Procedural lapses/errors by Ampol employee or ship crew	Oil/product sheen in bay during rain event or ship refuelling activity	
Vehicle collision Procedural lapses/errors – Ampol employee or contractor	Equipment damage resulting in an uncontrolled release	
Off-site Sub Station failure black out following lightning strike	Failure of power system	
Kurnell is considered a bushfire-prone area	Bushfire spread from or to the adjacent national park	
Collision with third party vehicle Truck roll over during travel or following collision	Tanker truck accident (offsite)	

Table 6-2 Potential Human Health Hazards - Pollution Event

Potential Initiating Conditions/ Events	Potential Receptors	Exposure Pathways
Fire – generating smoke and vapours Loss of containment impacting surface waters	Site personnel	Ingestion and dermal contact with contaminated surface water; groundwater; vapour inhalation
Fire – generating smoke and vapours Loss of containment impacting surface waters Intercepted product lines during trenching	Maintenance workers and excavation workers at, and in the vicinity of, the site	Ingestion and dermal contact with groundwater
		Ingestion and dermal contact with contaminated soil
		Vapour inhalation in trenches and pits
Bushfire / Natural threat impacting on-site and offsite	Site personnel and adjacent commercial or residential site users	Inhalation (hot bushfire ash and smoke) Dermal contact with hot flying ash
Loss of containment impacting surface waters and groundwater	Adjacent Commercial or Residential Site Users	Ingestion of groundwater and vapour inhalation
Loss of containment impacting surface waters and groundwater	Surface Waters (Kurnell Peninsula)	Lateral migration of contaminants in shallow groundwater

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7. INVENTORY OF POLLUTANTS

Kurnell Terminal receipts, stores, handles and distributes a large number of fuel products and fuel additives, and has a comprehensive system for safe handling of such materials. The site uses this system that includes amongst others,

- Dangerous Goods and Hazardous Substances Manifest and Notification Procedure
- Safety Data Sheets for Ampol Fuel Products and other chemical agents stored on site
- procedures for the approval of new chemicals on site
- procedures for safe storage, use and disposal of these materials

In addition, to meet the requirements of Acts other than the environmental legislation, updates of the site's Manifest of Schedule 11 Hazardous Chemicals (CD18647) are undertaken and provided to NSW SafeWork Authority and NSW EPA.

Section 5.6 of the ERP also provides a list of products classified as Dangerous Goods and Hazardous Chemicals and other relevant data.

8. COMPREHENSIVE EMERGENCY RESPONSE PLAN

The Kurnell site (land and wharf) is staffed 24 hours a day, 365 days a year by an experienced Operations team. In addition, a security team located on site (land and wharf) undertake regular patrols around the site. There are a number of early detection systems installed on tanks, piping and other storage units to monitor flow movements and tank fill rates. These systems include:

- Tank gauging
- High and high-high level alarms
- Independent tank over-fill alarms which trip out fill valves
- Lower Explosive Level (LEL) monitors/alarms in bunds (for Gasoline)
- CCTV and flame detectors on tank tops - images back to Terminal Control room
- Monitoring and alarms for uninitiated tank fill (and flows to/from or in incorrect direction)

Similar detector and alarm systems are in place at the Wharf. They are automatically activated during ship tanker discharge in the event of flow irregularities or losses from the system.

A key part of the Operations Coordinators role (land and wharf) is to monitor product flow/movements and the systems mentioned above. All such movements are monitored and tracked using the Digital Control System (DCS). In cases where an alarm is activated, their role is to acknowledge the alarm, investigate the reason for the alarm and respond accordingly as a *first responder*. They have a number of *first responder* tools available:

- Use of spills kits strategically located around the site along with additional back up equipment and supplies, as needed

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- Use of marine oil spill booms and marine vessels to contain and/or disperse a Level 1 spill where possible
- Activate the Kurnell site alarm and notify Ampol Emergency Hotline and other agencies, as appropriate
- Shut down all terminal operations via the DCS

The Kurnell Terminal operates a comprehensive **Emergency Response Plan - ERP** (CD2037), in line with the requirements of the Ampol Group Emergency Management Standard (CD3158). The ERP describes:-

- various procedures to be followed or complied with;
- available response equipment & safety gear;
- outline of the teams of trained people to support the implementation of that plan.

In addition to the ERP, a number of Scenario Guidance Notes (SGN) have been developed to deal with the types of possible emergency events. Amongst these SGN's are ones that deal with pollution events to land and water. These tools, along with the ERP, are also used as training aids for the Operations Coordinators and the other members of local emergency response team.

To date the ERP and the SGN's has been successful in protecting and minimizing impacts on the environment. Regular exercises are carried out and changes to the plan are made as required to incorporate learning from the exercises. Copy of the Kurnell Emergency Response Plan is published in the Ampol DMS and available to third parties on request.

The components of the Emergency Response Plan and this PIRMP are cross-referenced to the relevant sections of the Environment Operations Act 1997 and POEO (General) Regulation 2009 – refer to Appendix B.

The site operates a 24 Hour Kurnell Community Hotline for the community to report any possible off site pollution events. To assist in an emergency situation, Ampol also operates a centralised emergency response service through the 24/7 ERS Provider (IXOM), referred to as the Ampol Emergency Hotline. This is **a 24 HOUR, 7 DAYS per week emergency response unit.**

The 24/7 ERS Provider Service has been contracted by Ampol to:

- provide a single point of contact with all appropriate Ampol response staff, on a 7 day/24 hour basis
- ensure contact is established with all appropriate Emergency Services
- ensure Ampol management and appropriate crisis management personnel are notified
- provide specialist response /first aid /technical advice (e.g. safety data sheet information)

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Employees will use the Ampol Emergency Hotline to ensure that all relevant staff and authorities are notified.

The Ampol Emergency Hotline contact number is (toll free):

1 800 033 111

9. CONTACT DETAILS OF THE RELEVANT AUTHORITIES TO BE NOTIFIED OF POLLUTION INCIDENT

Table 9-1 KEY EXTERNAL CONTACT INFORMATION

Relevant Government Agencies		
1. Whether there is threat to human health or property or not		
2. Always request a Call Reference No.		
Fire & Rescue NSW	000	000
EPA (Kurnell Terminal Licence #837)	24 hour notification line info@environment.nsw.gov.au	131 555
SafeWork NSW (formerly WorkCover)	24 hours notification line	131 050
Port Authority of NSW (formally SPC)	Port Emergencies - 24 hours	9296 4003
Ministry for Health (Public Health Unit – Randwick) South Eastern Sydney Local Health District (Public Health Unit)	Business Hours After Hours (ask for Public Health Nurse) <i>Email:</i> <i>SESLHD-PublicHealthUnit-EH@health.nsw.gov.au</i>	9382 8333 9382 2222 9382 8233 (Option 4) AH: 9382 2222
Sutherland Shire Council	Local Emergency Management Officer David Kelly. <i>ssc@ssc.nsw.gov.au</i>	9710 0551 0414 193 743
Regional Emergency Management Officer	Phil Bow - REMO	9285 3124 0413 388 580
Department of Home Affairs	Marine Security Incidents	1300 791 581
<i>https://www.homeaffairs.gov.au/ https://www.homeaffairs.gov.au/help-and-support/departamental-forms/online-forms/maritime-security-incident-report-form</i>		

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Department of Planning and Infrastructure	It is a condition of consent to notify DPI of all incidents with potential offsite impact within 7 days of the incident occurring	9228 6111
Fire and Rescue NSW	24 hour hotline for reporting pollution incidents	1300 729 579
Fire / Loss of Containment Incident contacts		
FRNSW Zone Commander Peter Cleary	Metropolitan South 2 Georges River	0427 416 163
FRNSW Operational Media Coordinator	Media Coordinator	(02) 9265 2999 0418 181 000
FRNSW	24-hour Hotline for reporting pollution incidents	1300 729 579
NSW RFS	Sutherland Shire Fire Control Centre	(02) 8508 4040
NSW Police	Sutherland Police Station Cronulla Police Station Sutherland Operations / Emergency Management Office: Kelly Dale. PAC Duty Officer PAC Supervisor Police Media Unit	(02) 9542 0899 (02) 9527 8199 (02) 9542 0754 0417 341 171 0409 560 966 (02) 8263 6100
CHUBB emergency foam	24 hours (response)	1800 099 255
Bureau of Meteorology	General (Sydney Office)	(02) 9296 1555
Sydney Airport	Control Tower Operations Airports Duty Manager Fire Control (Fire Rescue Response - 24 hours)	(02) 9556 6663 (02) 9667 6097 (02) 9556 6888 (02) 9556 6889

Table 9-2 KEY INTERNAL CONTACT INFORMATION

Position	Name	Contact
Primary Emergency Numbers		
Emergency Services	24 hour emergency services call out	000
Ampol Emergency Response (Duty Manager)	IXOM ERS – 24 hours	1800 033 111
Ampol Kurnell Terminal	Terminal Operator – 24 hours	0460 884 602 (02) 8543 8550 (02) 8543 8551 (02) 8543 8549
Ampol Guardhouse	24 hours	Internal only - ext. 333 (02) 8543 8637

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Ampol Management			
Ampol AMT Duty Manager	24 hours		1800 033 111
General Manager - Distribution	Amanda Keogh		0412 487 917
Head of Terminals Australia	George MacLeod		0499 486 492
Kurnell Terminals Operations Manager	Zoe Devos		0403 120 068 0402 370 851
Kurnell Terminal – Operations Specialist	Richard Muslic	(02) 8543 8535	0403 922 851
Kurnell Terminal – Operations Specialist	Rod Hassall		0401 678 672
Kurnell Terminal – Operations Specialist	Bill Bain	(02) 8543 8544	0447 643 825
HSEQ Manager, Infrastructure.	Lejla Makas	(03) 9287 9528	0418 591 359
WHS Business Partner - Distribution	Rebecca Heywood		0497 643 118
Senior Safety Specialist	Alex Mann	(02) 8543 8545	0468 970 780
National Environment Manager Distribution	Jos Kusters	(02) 9668 1093	0478 303 105
Senior Environment Management Systems Specialist	Amanda Basten		0407 959 572
Ampol Management			
Kurnell Remediation Manager	Damien Davidson	(02) 9250 5724	0478 310 289
Corporate Risk & Compliance Mgr.	Jason Moore		0406 662 050
Senior Manager Communications	Sam Sheldon	(02) 9250 5398	0449 514 074
Distribution Emergency Response Specialist	Julian Taylor		0491 242 113
Community Engagement Manager	Daniel Scully	(02) 8543 8556	0407 711 454

Note:

Refer to (CD2037) Kurnell Emergency Response Plan – Contact List for full list of contact phone numbers

9.2 Community

Consultation with community members during and/or after a reportable pollution incident will be undertaken in accordance with this PIRMP. The police will generally take on the role of interfacing with site neighbours but may require the assistance of Ampol personnel.

If an incident has potential for community impact, the community may be notified through the use of the Whispir messaging platform. This will provide initial alerts and information that is clear and easy to understand. Advice around evacuation and other actions, remain the responsibility of emergency services and the community is advised to always follow their directions.

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In the days following a pollution incident, appropriate platforms are to be considered for implementation to communicate further with the community. These include but are not limited community drop-in centre, door knocking and the distribution of community updates via letterbox drop. The community may also contact the Terminal via the dedicated 24hour hotline on **1800 719 669** or community@ampol.com.au

9.3 Kurnell Neighbouring Sites – Contact Details

A list of contact details for neighbouring sites is presented in Table 9-3 below.

Table 9-3 Neighbour Contact List

Organization/Neighbour	Telephone	Communication Responsibility
Kurnell Public School (e-mail: kurnell-p.school@det.nsw.edu.au)	Lisa Owen – Principle (02) 9668 9864	Kurnell Terminal Operations Manager or delegate
Kurnell Pre-School Kindergarten	Kelly - Director (02) 9668 9638 0418 284 660	
Kurnell Community & Sports & Recreation Club	Peter Cavdarovski – General Manager (02) 9668 9259 Mob: 0401 292 829 David Cavdarovski – President Mob: 0401 292 829	Kurnell Terminal Operations Manager or delegate
Kurnell Progress and Precinct Residents Association Inc.	Rob Stanley-Jones – President 0416 202 441	
Kamay Botany Bay National Park	Sam Reid – Ranger 0437 497 423 Jeremy Malgras – Ranger 0486 030 989 Ben Kahn - Manager 0438 285 943	

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Organization/Neighbour	Telephone	Communication Responsibility
Sir Joseph Banks Drive		
Desalination Plant	Phil Narezzi – Manager 0421 580 180	Kurnell Terminal Operations Manager or delegate
Desalination Plant - Veolia	Reece Karamihas – O&M Manager 0419 427 319 0457 857 816 – Duty Operator (02) 9710 9727 – Operations Desk Colin Storey – Safety & Quality Advisor 0408 969 001	
Holloway Removals (Chislom Road)	Lachlan Yard Manager 0434 370 804	
Aldridge Electrical Industries	Karen Liddy 02 9540 9966	
Vision Packaging	Leanne 02 9668 9122	
All Valve Industries	Trent Kilner 02 8543 9811	
Bricor Pty Ltd	Bruce Little 02 8543 5333	
TCF International	02 8336 9000	
Activ Mail	02 9540 5488	
Australian Toy Distributors	02 9668 9800	
ESG Asia Pacific	alicea@esgasiapacific.com	
Pro Beauty Solutions	Jacqui 0403 821 070	
C Box Containers	Luke Talbot 0416 202 441	
D Houghton Plumbing	Jack Houghton 0400 870 630	

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MCM Skip Bins	Matt Mahoney	Kurnell Terminal Operations Manager or delegate
DJD Brick & Blocklaying	Dennis Souvleris 0408 241 016	
Cook Street		
Complete Home Tuning	Richie 9668 8288 0415 282 322	Kurnell Terminal Operations Manager or delegate
Local Cleaning	Miae Common 0419 000 023	
Sydney Rope Supplies	Byron 0401 920 603	
Kurnell Kustoms	Russel Keen 0401 265 495	
Fire System Products	Troy Suttor 0447 551 511	
LabSports	Bruce Stubbs 0448 688 576	

Note:

Ampol has collected personal information (telephone numbers) for the sole purpose of communication to its neighbours in the event of an emergency where adjoining premises need to be advised of the emergency so that appropriate action (if required) can be taken. Personal information held by Ampol in accordance with the Privacy Act 1988 can be accessed by asking a privacy-related question or obtaining a copy of Ampol's Privacy Policy statement. Please write to "the Privacy Compliance Officer, 29-33 Bourke Road, Alexandria, NSW, 2015". Ampol's Privacy Statement can also be viewed at www.ampol.com.au

9.4 Incident Risk Ranking

Table 9-4 - Incident Risk Ranking below, provides a list of products stored at Kurnell Terminal and the need for early warning, depending on the nature of the incident. Early warning requirements for neighbours are included. Where the likely impact on Neighbours is rated Medium or High, action must be taken to advise neighbours of the incident. In these cases, external emergency services such as the Police generally initiate contact with affected neighbours and adjacent businesses. In their absence or at their request, the Terminal Emergency Controller or their delegate, shall inform affected neighbours and adjacent businesses and advise on necessary action/s to be taken. This would include mustering at a suitable location in Kurnell.

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Table 9-4 Incident Risk Ranking

Chemical	Chemical Hazard?	Amount Stored (kl)	Need for Early Warning	Potential Hazards Identified	Level of Impact	Likelihood	Priority	Impact on Neighbours
Gasoline	Yes	<330000	Yes	• Release to ground & groundwater	M	L	M	L - M
				• Release into surface waters, stormwater; waterways	H	L	H	H
				• Ignition – explosion, fire, smoke with potential effect on emergency responders, local community	H	L	H	H
				• Vapour cloud with potential effect on emergency responders, local community	H	L	H	H
Diesel	Yes	<285,000	Yes	• Release to ground & groundwater	M	L	M	L-M
				• Release into surface waters, stormwater; waterways	H	L	H	H
				• Ignition – fire, smoke with potential effect on emergency responders, local community	M	L	H	M
Jet Fuel	Yes	<145,000	Yes	• Release to ground & groundwater;	M	L	H	L-M
				• Release into surface waters, stormwater; waterways	H	L	H	H
				• Ignition – fire, smoke Ignition – fire, smoke with potential effect on emergency responders, local community	H	L	H	H
				• Vapour cloud with potential effect on emergency responders, local community	H	L	H	H
Additives	No	<45,000	Yes	• Release to ground & groundwater;	M	L	M	L-M
				• Release into surface waters, stormwater; waterways	H	L	H	H
				• Ignition – fire, smoke with potential effect on emergency responders, local community	L	L	M	M
Slops	Yes	<50,000	Yes	• Release to ground & groundwater;	M	L	M	L - M
				• Release into surface waters, stormwater; waterways	H	L	H	H
				• Ignition – fire, smoke with potential effect on emergency responders, local community	H	L	H	H
				• Vapour cloud with potential effect on emergency responders, local community	H	L	H	H
Oily Water	No	<45,000	Yes	• Release to ground & groundwater;	M	L	M	L
				• Release into surface waters, stormwater; waterways	H	L	H	H

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9.5 Contact Details of Site Contact for Waste Transport Incident

In the event of a pollution event involving the transport of waste from the Kurnell site to a waste treatment facility (e.g. landfill), the Ampol Emergency Response Hotline (*toll free*) can be contacted to alert us of the incident and request our response.

Title	Direct
Ampol Emergency Response Hotline	1800 033 111

10. RELEVANT INFORMATION TO BE GIVEN WHEN NOTIFYING

The relevant information to be given according to Section 150 of the POEO Act (1997) when notifying the incident to the regulatory authorities is as follows:

- Time, date, nature, duration and location of the incident
- Location of the place where pollution is occurring or is likely to occur
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- The circumstances in which the incident occurred (including the cause of the incident if known)
- Action taken or proposed to be taken to deal with the incident, and any resulting pollution or threatened pollution, if known
- When the information relating to items c), d) or e) is not known at the time of verbal notification, this information must be provided once it becomes available.

11. PROCEDURES TO BE FOLLOWED

The relevant parts of the Ampol Kurnell Emergency Response Plan and its procedures would be activated for delivering this Pollution Incident Response Management Plan (PIRMP). If a pollution event occurs, the emergency controller will take actions according to the Kurnell Terminal Emergency Response Plan.

However, for completeness of the Pollution Incident Response Management Plan, the following additional information is presented:

11.1 Other Notification of Pollution Incidents

The EPA may, as per section 151A of the POEO Act (1997),

- direct the person verbally to notify such other persons of the incident as it requires;
- specify the manner and form of notification;
- direct that any initial verbal notification be followed by written notification.

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11.2 Identification of Appropriate Regulatory Authority

Should a pollution incident occur, the National Environment Manager, Distribution will have the responsibility of determining the “Appropriate Regulatory Authority” (ARA). This, in turn, will determine the party or parties to be notified.

11.3 Notification of employees and other site personnel

All personnel on site (employees and contractors) will be informed immediately of a site emergency (which can include a “Pollution Incident”) via the Site Emergency Alarm or the Terminal public broadcast system.

Members of the Kurnell Terminal Local Emergency Response Team (LERT) and other personnel involved with the implementation of the ERP related to the pollution incident are notified by phone or SMS as soon as the emergency has been identified.

11.4 Roles and Responsibilities

The roles and responsibilities defined in the Kurnell Terminal ERP are not in any way reduced by the preparation of this PIRMP.

The responsibilities specific to the PIRMP are included in the relevant parts of this report for clarity.

11.5 Response Triggers

Triggers requiring a response or update of this PIRMP include:-

- Community complaints or feedback that warrant an update;
- Regulatory response or instruction;

Odour events are dealt with in the Kurnell Emergency Response Plan (CD2037) and the Kurnell Community Engagement Framework (CD17864).

12. AVAILABILITY OF PLAN

This Kurnell PIRMP will be available on the Ampol Public Website and will be supplied free of cost to anyone requesting the plan in writing, generally within 14 days of the request being made.

This PIRMP is also referenced in the Kurnell Terminal ERP. Hard copies of the Plan will be retained at the Kurnell Terminal at:

NAME	LOCATION
Operations Coordinator	Operations Control Room
Duty Operations Coordinator	Emergency Operations Centre (EOC)
Terminal Operations Manager	TOB Office
Emergency Manifest Box	Kurnell Terminal Main Entrance – Emergency Operations Centre (EOC)

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Soft copies will be stored in the Ampol Document Management System (DMS), with easy access via the Terminal Environment Key Information page. Details of this Plan will be made available to authorised personnel, upon request.

13. STAFF TRAINING

Staff training requirements of this PIRMP are included in Environmental Awareness Training which is provided to all Terminal personnel via the Ampol Learning Management System (LMS).

The Kurnell Terminal Operations team constitute the *first responder* emergency response (ER) team and are instructed in the requirements of this plan as part of their ER training. The annual ER training program includes a pollution event scenario.

14. TESTING OF PLANS

The Kurnell Terminal Operations Manager has delegated responsibility for the regular testing of the PIRMP to the Kurnell Terminal Operations Specialist. This role is responsible for:

- arranging for this plan to be tested routinely once every 12 months and;
- the accuracy of the information contained within the plan checked and;
- confirming consistency with other related emergency response procedures developed in the preceding 12 months

A specific aspect of this Plan will be assessed in a Desktop Exercise every 12 months, supported by concurrent field scenario exercises/tests, whenever possible. Refer to Appendix A: Log of Plan Tests details completed to date.

Note: Emergency response exercises –dates and scenario details held in Cintellate as a Meeting.

This plan will also be tested:

- within one month of the occurrence of any “pollution incident,” or
- at the discretion of Fuels Supply Chain Leadership Team (FSC LT), to incorporate improvements to the effectiveness and workability of the plan as well as changes to responsibilities of the persons implementing this plan, for example, within one month of the occurrence of any “pollution incident.”

Any actions arising from the post event debrief and tests will be held in Cintellate and tracked to completion

Note: The Kurnell Terminal ERP has its own testing plan and timelines for testing relevant equipment appropriately, as per Legislative requirements, Australian Standards and International Standards where available and in that order.

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If the testing requirements detailed in this section are also mentioned in the ERP, then they are to be regarded as the same, otherwise the testing requirements are to be regarded as over and above those listed in the Emergency Response Plan.

15. PLAN REVIEWS AND UPDATES

Results of the tests will be used for incorporating:

- improvements to the effectiveness and workability of the plan;
- changes to responsibilities of the persons implementing and/or maintaining the plan;
- changes in contact details.

Such changes will be incorporated into the Plan within 3 months of the tests taking place. A log of tests, showing the dates, and learnings is included at the rear of this Plan in Appendix A.

The Distribution Senior Environment Management Systems (EMS) Specialist has delegated responsibility for maintaining this plan. Plan versions will be managed in accordance with the Ampol Group Controlled Documents Standard (CD6547).

Table 15-1 Plan Updates

Version Number & Date	Updates/Changes/Inclusions	Responsible Person
Version 1.0 2016	New document	Pam Meers
Version 2.0 Nov 2018	Review – currency of operational details, phone numbers, test exercise dates	Amanda Basten
Version 3.0 Feb 2020	Training exercise at BMT- involving KNT, BMT and NCT ER Leads. PIRMP scenario and document review by ASBG – Andrew Doig Review of phone numbers – currency of operational details, phone numbers, test exercise dates	Amanda Basten
Version 4.0 Sept 2020	Plan revised- EPA feedback: Specifics who is responsible for testing of plan and schedule Inclusion of new Section 15 called <i>Plan</i> Revised & new diagrams <ul style="list-style-type: none"> • Revised Emergency Services • ELP Identification Points • DG Depot locations 	Amanda Basten Jos Kusters
Version 4.0 March 2021	Additional feedback from NSW EPA. PIRMP: <ul style="list-style-type: none"> • needs additional details of conditions or events that could or would increase likelihood of hazards occurring • Inclusion of a stormwater drainage diagram 	Amanda Basten Jos Kusters
May 2021	Revised PIRMP sent to NSW EPA. PIRMP.	Amanda Basten

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	Advised no further comments to make re need to make further change the PIRMP	
May 2022	Post Kurnell Terminal Flood event – debrief and review of the PIRMP. Refer to MEET-008510	Amanda Basten
Version Number & Date	Updates/Changes/Inclusions	Responsible Person
April 2023	Review and revision of the Tables 9.1 and 9.2 Contact List (internal and external agencies) to better align the PIRMP with the KNT ERP (CD2623) following SafeWork NSW feedback.	Amanda Basten
November 2023	<p>Further amendments to PIRMP arising from NSW EPA 'Compliance Audit Report - Liquid Chemical Storage and Handling – PIRM Plan audit findings. The following changes/additions have been made:</p> <ul style="list-style-type: none"> • Inclusion of bushfire/natural threat impacts onsite and offsite in Table 6-1 and 6-2 • Updated GM name and other contact details • Amendments regards mechanism for notifying community • New Diagram (No.3) showing proximity of offsite critical infrastructure that may be impacted during major incident at Kurnell Terminal (including wharf) • Larger A3 (legible) Diagrams 4-7 inserted 	Amanda Basten
January 2024	<p>Further amendments to PIRMP arising from further discussions with NSW EPA regards:</p> <p><u>Diagram 6-Kurnell Terminal Stormwater Draining System</u> - insertion of Text Box Note stating larger (A1) Diagram is located in the EOC</p> <p><u>Diagram 8- Dangerous Goods Depot Locations</u> - Diagram amendment to place the Tank numbers outside of tank for better visibility/clarity</p>	Amanda Basten
May 2025	Review – currency of operational details, phone numbers, latest test exercise dates added.	Amanda Basten

16. REPORTING

An incident debrief and incident investigation report will be prepared following any Incident which triggers the Kurnell ERP and /or this PIRMP. In such instances, Ampol will appoint a Lead Investigator who will report to the designated incident owner, under Legal Privilege if requested by Ampol Legal Counsel.

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Where the report identifies gaps and/or opportunities for improvement, all such recommended changes will be incorporated into the Plan. The Kurnell Terminal Operations team and any other affected/interested parties will be informed of the Plan changes.

Diagrams

Diagram 1	Geographical Location of Ampol Kurnell Terminal Site
Diagram 2	Street Map of the Kurnell Peninsula
Diagram 3	Offsite Critical Infrastructure Potentially Impacted by Major Tank Fire or Major Petrochemical Spill (Marine)
Diagram 4	Kurnell Terminal Surrounding Land Use
Diagram 5	Kurnell Terminal Layout and Environment Protection Licence – EP Identification Points
Diagram 6	Kurnell Terminal Stormwater Draining System
Diagram 7	Emergency Services Briefing Map
Diagram 8	Dangerous Goods Depot Locations

Appendices

Appendix A.	Log of Plan Tests
Appendix B.	Kurnell PIRMP and ERP Alignment with Environment Operations Act 1997 and POEO (General) Regulation 2009

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Diagram 1. Geographical Location of Ampol Kurnell Terminal Site (Land and Wharf)



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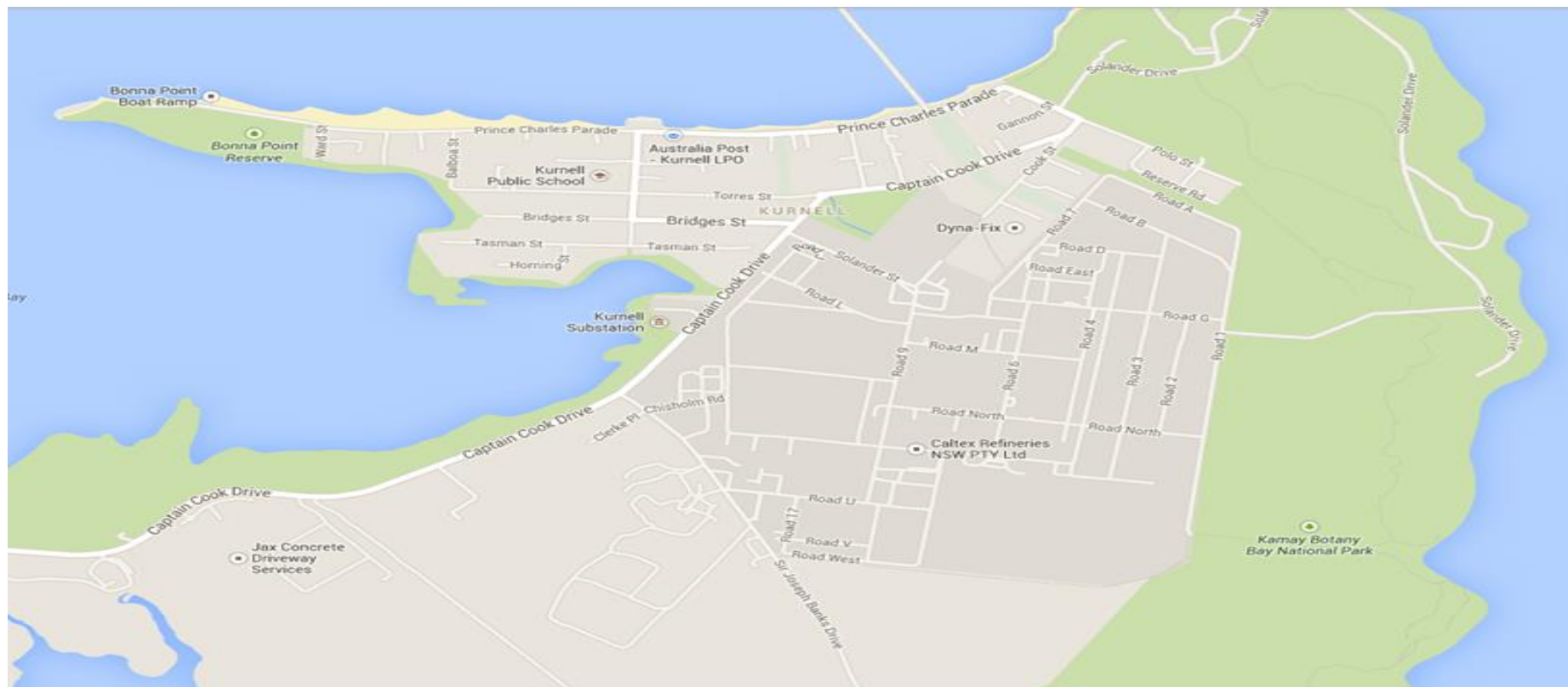
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Diagram 2. Street Map of the Kurnell Peninsula

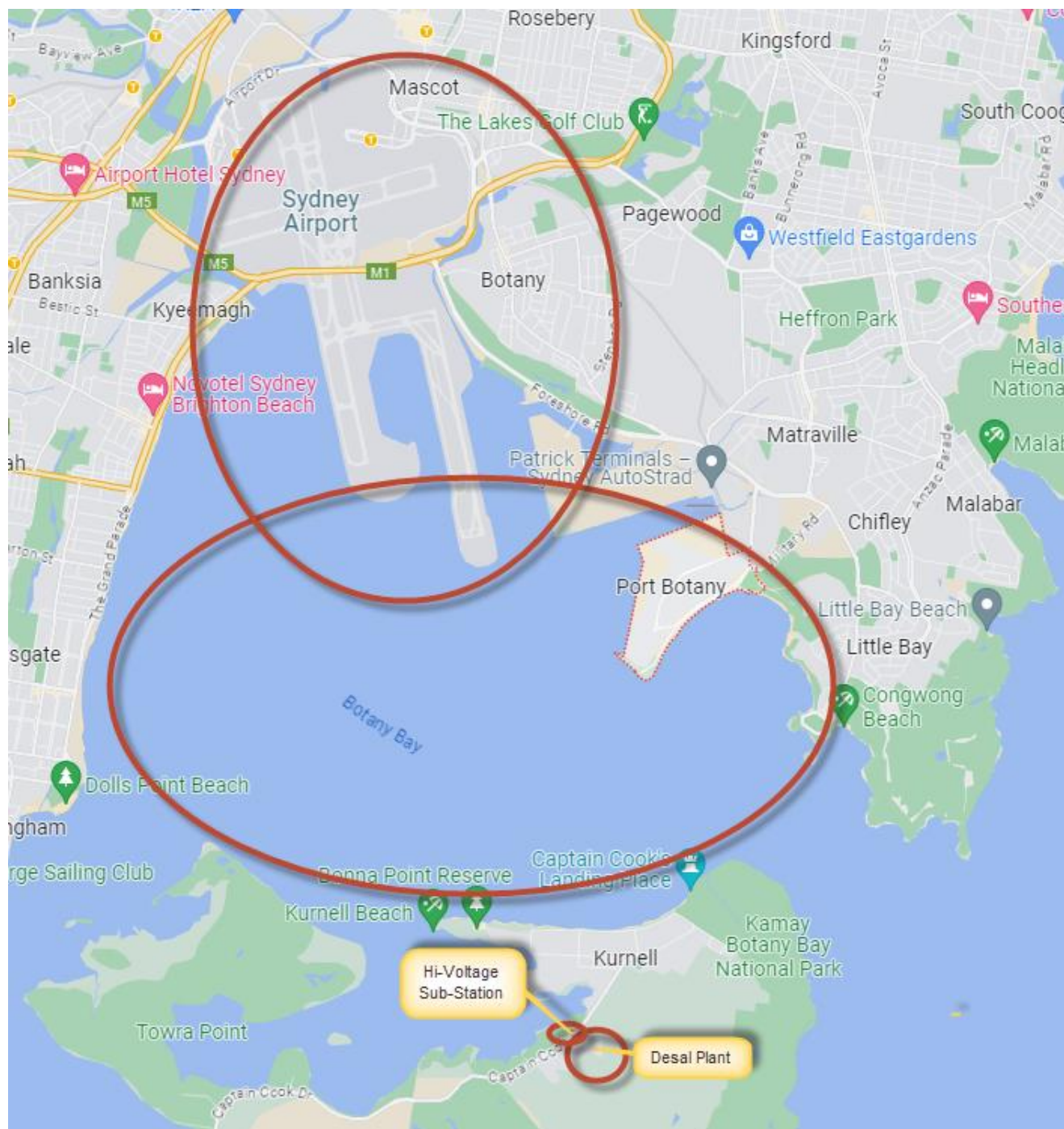


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Diagram 3. Offsite Critical Infrastructure Potentially Impacted by Major Tank Fire or Major Petrochemical Spill (Marine)



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Diagram 4. Kurnell Terminal Surrounding Land Use



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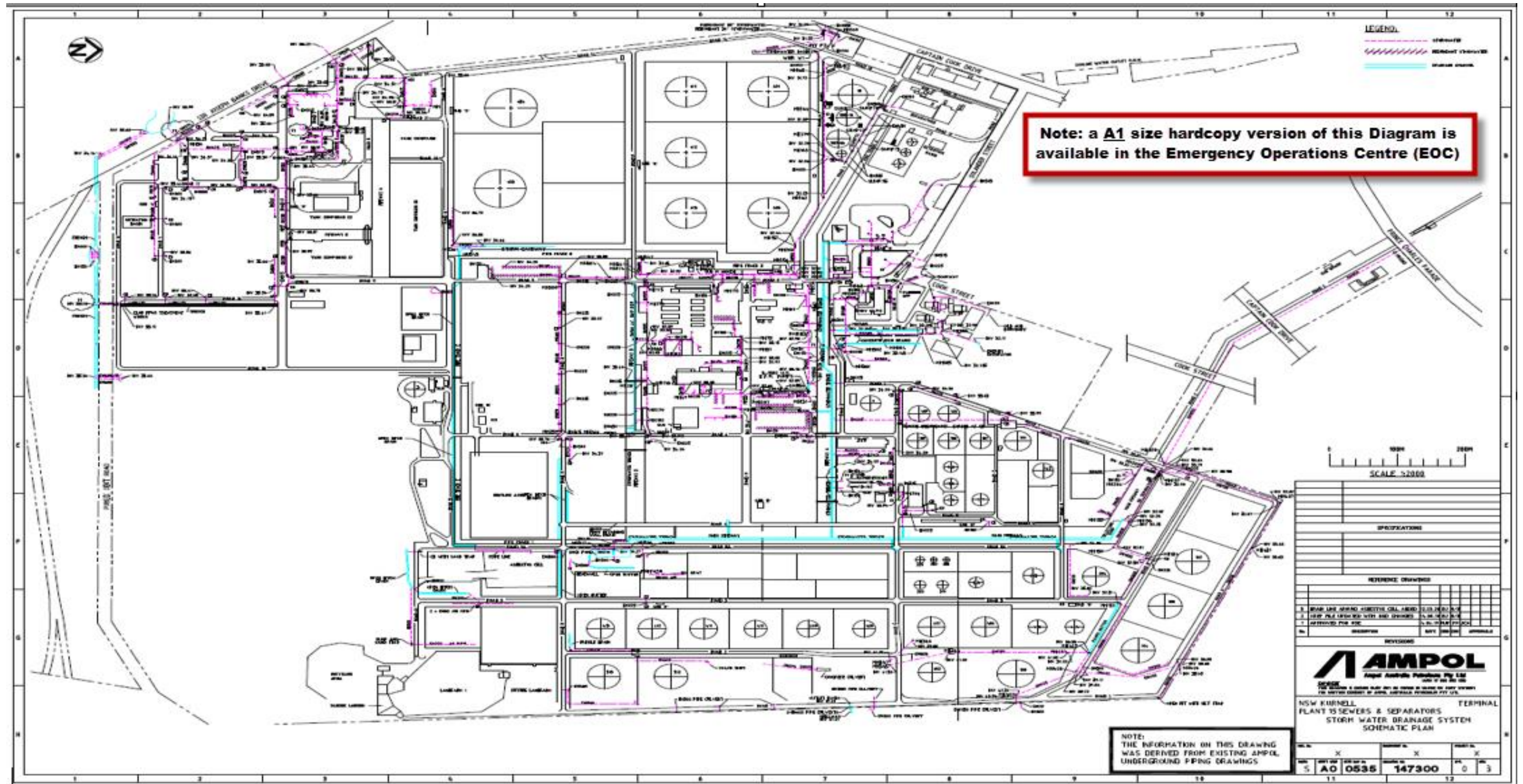
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Diagram 6. Kurnell Terminal Stormwater Draining System



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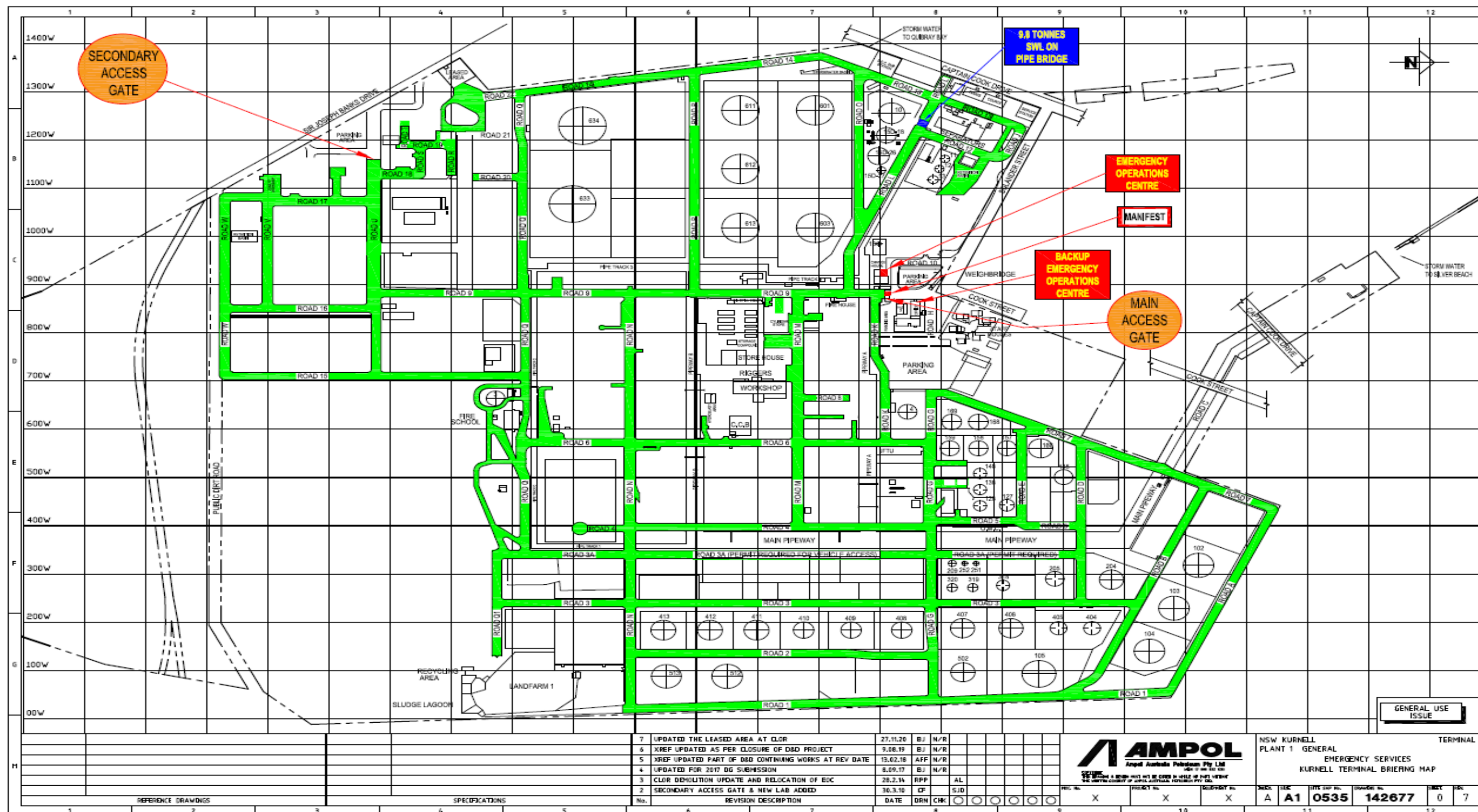
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Diagram 7. Emergency Services Briefing Map



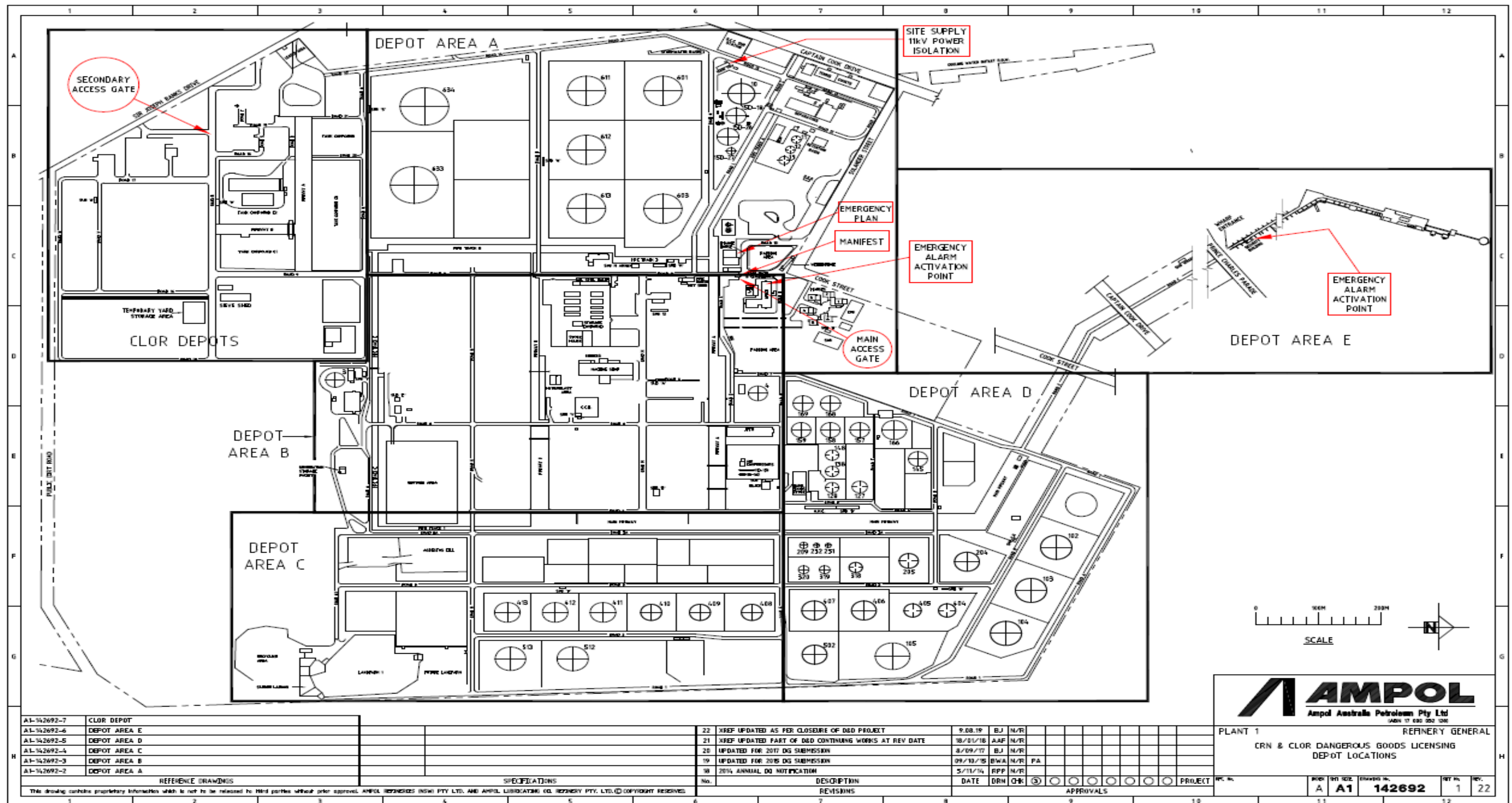
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Diagram 8. Dangerous Goods Depot Locations



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Appendix A. Log of Plan Tests

Test Date	Coordinated By	Results	Actions Resulting
2016 Program			
24 August 2016	Kurnell Operations Specialist	Exercise completed successfully	Administrative changes required to ERP and PIRMP
2017 Program			
7 March 2017	Kurnell Operations Specialist	Exercise completed successfully Scenario details not available	Updated Test Log details Nil PIRMP changes needed
22 June 2018	Kurnell Operations Specialist	Exercise completed successfully Scenario details not available	Nil
2018 Program			
23 October 2018	Kurnell Operations Specialist	Exercise completed successfully – Scenario details not available	Updated Test Log details Administrative changes required to PIRMP
21 June 2018	Kurnell Operations Specialist	Activation of Oil Spill Equipment Exercise completed successfully	Nil
2019 Program			
12 March 2019	Kurnell Operations Specialist	Full Surface Tank Fire Exercise – PIRMP activation test	Updated Test Log details Checked contact details Nil PIRMP changes needed
22 August 2019	Kurnell Operations Specialist	Pool Fire - Pipeway and pump slab - PIRMP activation test	Updated Test Log details Nil PIRMP changes needed
2020 Program			
25 Feb 2020 Half Day event: PIRMP Regulatory framework training conducted by A. Doig, ASBG and accompanying Scenario Exercise: Jet Fuel line LOC – localised pollution to soils	Amanda Basten, EMS Specialist	All NSW Terminals represented at the Training and the scenario exercise. Draft EPA Guideline discussed All PIRMP's will be revised (format and extra Maps) once the EPA Guideline is published	Change to the contact details for Bayside Council: Now 1300 581 299 Updated Test Log details Revised & new diagrams <ul style="list-style-type: none"> Revised Emergency Services ELP Identification Points DG Depot locations

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Test Date	Coordinated By	Results	Actions Resulting
2021 Program			
<p>20 May 2021</p> <p>Exercise started 08:00hrs and declared over at 12:20hrs</p>	<p>Kurnell Operations Specialist In conjunction with NSW Ports Emergency Response Co-ordinator</p>	<p>Joint (Ampol & NSW Ports) Oil Spill Exercise with EOC activation</p> <p>Scenario: Marine incident – loss of bunkering fuels into Botany Bay during backloading activity at Kurnell Wharf – reported to be 80kL loss</p> <p>Ampol ER team - deployment of marine booms using launch via Silver Beach</p> <p>NSW Ports deployed spill response equipment (booms via launch) VTS comms tested – all OK</p> <p>PIRMP activation test – call to all regulatory agencies (test only) EOC and EEC opened Ampol</p> <p>Call to IXOM ERS and activation of CMT (test)</p> <p>Debrief conducted between Ampol and Ports completed</p> <p>Additional meeting planned for week of 7 June</p>	<p>Updated Test Log details</p> <p>Ops Mgr. – Desalination Plant name & contact details changes made – direct to operations now</p> <p>All other contact details in PIRMP correct - Nil other PIRMP changes needed</p> <p>Internal contact list in EOC needs updating – ERP is current but list on wall incorrect</p>
2022 Program			
<p>Post Flood Event</p>	<p>Kurnell Terminal Ops Manager</p>	<p>Post 7th April Flood event review – Desktop exercise to consider outcomes of feedback from community and those on shift that night.</p>	<p>PIRMP will remain the same – pending outcomes of: EPA investigation. Improvements suggested from Kurnell Community Working Groups have reported back.</p>

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Test Date	Coordinated By	Results	Actions Resulting
2023 Program			
<u>MEET-009663</u> Oil Spill Exercise 28 February 23	Kurnell Terminal Ops Coordinator (J. Pavett)	Oil spill exercise to go over the equipment (booms, launch, curtains, etc.) needed to respond to and contain 'oil spills to water'. Discussion regards the maintenance requirements of this type of equipment (on M7 program) Session led by John Pavett 8 participants included in the session A Shift team names detailed in the Meeting notes.	PIRMP contact list check OK. Nil changes required
<u>MEET-007761</u> Oil Spill Exercise 17 March 2023	Kurnell Terminal Ops Coordinator (T. Edwards/ J. Pavett)	Oil Spill response equipment familiarisation and checks. Land deployment and training of equipment – Marine based Field Exercise. 6 participants Review the response plan requirements. D Shift team names detailed in the Meeting notes	PIRMP Contact List to be amended to align with changes to the KNT ERP contact list – Expansion of 3 rd party agencies to call
<u>MEET-010785</u> Emergency Response Debrief/Test PIRMP 21/08/2023	Kurnell Terminal Compliance & Training Specialist (V. Mayes)	Debrief to go over our response to the emergency alarm being raised for the ERS Emergency Release System fault at Kurnell Wharf – PIRMP test	No changes to the PIRMP required at this time. Other actions associated with incident debrief assigned and recorded in the Meeting record.

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Test Date	Coordinated By	Results	Actions Resulting
2024 Program			
<u>MEET-014118</u> 12 Sept 2024 And <u>MEET-014544</u> 31 Oct 2024	Kurnell Terminal Compliance & Training Specialist (V. Mayes)	Field and familiarization of the wharf fire systems with trainer (Al Richardson) referencing both ERP (CD2037) and testing accuracy of PIRMP (CD4187)	PIRMP confirmed as current and accurate.

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Appendix B.

Kurnell PIRMP and ERP Alignment with Environment Operations Act 1997 and POEO (General) Regulation 2022

Environment Operations Act 1997		
Section of Act	PIRMP Section Reference	Kurnell ERP (where relevant)
153A	1.Introduction	3. Introduction
153C	5.Notification Responsibilities 8. Comprehensive Emergency Response Plan 9. Contact Details of Relevant Authorities to be Notified of Pollution Event <ul style="list-style-type: none"> Table 9.1: External Contact Information Table 9.2: Internal Contact Information Table 9.3: Neighbourhood Contact List 	7.0 Roles and Responsibilities 9.1 Notification of an emergency
153D	12. Availability of Plans	2.0 Distribution List
153E	14. Testing of Plans	6.10 Training, Testing, Exercises
153F	5.Notification Responsibilities 8. Comprehensive Emergency Response Plan 11. Procedures to Follow	8.3 Spills Containment & First Aid Resources 9.0 Response procedures 9.1 Notification of an emergency
POEO (General) Regulation 2022		
Section of Act	PIRMP Section Reference	Kurnell ERP (where relevant)
98C(1) (a)	6, Description of Environmental Hazards	5. Site Profile
98C(1) (b)	6, Description of Environmental Hazards <ul style="list-style-type: none"> Table 9.4 Incident Risk Ranking 	5.7 Major Incident Hazards 6.2 Risk Assessment
98C(1) (c)	8. Comprehensive Emergency Response Plan	Kurnell ERP (whole)
98C(1) (d)	7. Inventory of Pollutants	5.6 DG and Hazardous Materials 5.7 Major Incident Hazards
98C(1) (e)	<ul style="list-style-type: none"> Table 9.4 Incident Risk Ranking 	5.7 Major Incident Hazards 6.2 Risk Assessment
98C(1) (f)	8. Comprehensive Emergency Response Plan	Kurnell ERP (whole)
98C(1) (g)	<ul style="list-style-type: none"> Table 9.2: Internal Contact Information 	6.7 Local Emergency Management Team 8.1 Emergency Contacts
98C(1) (h)	<ul style="list-style-type: none"> Table 9.1: External Contact Information 	6.6 Regional Emergency Management Team 6.7 Local Emergency Management Team 6.8 Incident Control 6.9 Emergency Operations Centre

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POEO (General) Regulation 2009		
Section of Act	PIRMP Section Reference	Kurnell ERP (where relevant)
98C(1) (i)	9.2 Community	6.8 Incident Control 6.9 Emergency Operations Centre 7 Local Emergency Management Team 7.1 Emergency Incident Command & Control 8.1 Emergency Contacts
98C(1) (j)	11.3 Notification of employees and other site personnel	7.1 Emergency Incident Command & Control 8.1 Emergency Contacts
98C(1) (k)	Diagrams 1, 2 and 4	5. Site Profile 5.2 Site Boundaries 5.3 Surrounding Land Use
98C(1) (l)	3. Comprehensive Emergency Response Plan	Kurnell ERP (whole)
98C(1) (m)	13. Staff Training	6.10 Training, Testing, Exercises
98C(1) (n)	Appendix A. Log of Plan Tests	11.4 Post Incident Assessment
98C(1) (o)	Appendix Y Document Stewardship	2.0 Distribution List
98C(1) (p)	14. Testing of Plans	6.10 Training, Testing, Exercises 11.4 Post Incident Assessment
98D(1)	12. Availability of Plans	2.0 Distribution List
98D(2)	12. Availability of Plans	2.0 Distribution List
98E(1)	14. Testing of Plans 15. Reporting	2.1 Controlled Hard Copies 2.2 Electronic Copies
98E(2)	14. Testing of Plans	6.10 Training, Testing, Exercises

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