

Document Title: Pollution Incident Response Management Plan	Author: R Tracey / T Roberts / L Peppertrees/M Grech Approved By: Mark Grech
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POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

CRAWFORDS FREIGHTLINES SANDGATE SITE

LOT 12 OLD MAITLAND RD SANDGATE 2304

NSW

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1. PURPOSE

To provide the procedures for pollution incident and spill response, including internal and external notifications for specific hazards at Crawfords Freightlines Lot 12 Old Maitland Rd, Sandgate site.

Guidance is provided on the notification and containment procedures to be employed in the event of losses of containment that have the potential to harm the environment within or adjacent to the Sandgate site boundaries.

2. BACKGROUND AND SCOPE

The Protection of the Environment Legislation Amendment Act 2011 (POELA Act) requires holders of an environmental protection licence to prepare and implement a pollution incident response management plan (PIRMP).

Specific requirements for PIRMPs are prescribed in Part 5.7A of the POELA Act. In summary, the legislation requires the following:

- holders of an EPL must prepare a pollution incident response management plan;
- the plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B);
- licensees must keep the plan at the premises to which the EPL relates;
- licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E); and
- if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

Crawfords Freightlines is the holder of EPL 20295, and is therefore required to comply with the provisions of the POEO Act.

Prior to the release of this document Crawfords Freightlines managed environmental incidents in accordance with the relevant procedures detailed in the site Emergency Response Plan. Due to growth and diversity of operations within the Sandgate site, and in the interests of best environmental practice, Crawfords Freightlines management have made the decision to implement a standalone PIRMP.

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3. OBJECTIVES

The objectives of the PIRMP are to:

- ensure comprehensive and timely notification regarding a pollution incident to persons employed at the site, the EPA, other regulatory authorities and emergency services, and neighbouring facilities that may be affected by the impacts of the incident;
- minimise and control the risks associated with a pollution incident at the site by risk identification and development of mitigating actions to control, minimise, and manage risk;
- ensure that the responses detailed within the plan are invoked by trained staff, response personnel are identified; and
- ensure the plan is tested for accuracy and currency and addresses the risks associated with the site operations.

4. REFERENCES

- Protection of the Environment Legislation Amendment Act (POELA) 2011;
- Protection of the Environment Operations Act (POEO) 1997;
- Protection of the Environment Operations Regulation (General) 2009;
- Environmental Guidelines: Preparation of pollution incident response management plans 2012; and
- Crawford's Freightlines Sandgate Emergency Response Plan.

5. DEFINITIONS

Absorbent Material

Materials that recover hydrocarbon spills through absorption or adsorption

Area Wardens

As defined in the site Emergency Response Plan

Incident Controller

As defined in the site Emergency Response Plan

Emergency Response

Actions to manage or control an emergency situation.

Emergency Response Teams

As defined in the site Emergency Response Plan

Emergency Services

- Fire and Rescue
- Ambulance
- SES
- Police

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Environmental Emergency

A sudden unplanned or unforeseen occurrence requiring prompt response, including but not limited to;

- a serious accident
- a medical emergency
- vehicle or plant damage
- fire
- loss of containment
- explosion

Hydrocarbon

All fuels, oils and the majority of lubricants are classified as hydrocarbons

Loss of Containment

An unplanned, uncontrolled loss of containment of a pollutant in any form (typically gas, dust, liquid, solid, gel)

Material Harm to the Environment

Actual or potential harm to the health and safety of humans, animals, bird life (including nesting habitats), fishes or ecosystems.

Pollution Incident

An incident during which or as a consequence of which there is an actual or potential loss of containment or uncontrolled escape of a pollutant.

Spill Kit

Absorbents, spill booms, mats, drain seals, or other control measures designed to control or contain losses of containment.

6. EMERGENCY PLAN ROLES

The roles and responsibilities defined in this plan are consistent with the site Emergency Response Plan (ERP) and as such all respective roles and responsibilities are the same as those identified in Sections 17 and 21 of the site ERP.

The following table 1 and table 2 are an extract of the ERP Section 17 and 21 respectively and detail the roles of all persons involved in the management of a site emergency.

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TABLE 1 ROLES AND RESPONSIBILITIES - RESPONSE

Role	Responsibility	Method
All persons identifying an emergency	<ul style="list-style-type: none"> Report emergency to Chief Warden 	<ul style="list-style-type: none"> Phone/UHF Radio/verbal
Security Patrols after hours	<ul style="list-style-type: none"> Report emergency to Emergency Controller or 000 	<ul style="list-style-type: none"> Mobile phone
Chief Warden	<ul style="list-style-type: none"> Alert site response team OR Advise Area Wardens to evacuate Advise other site users to evacuate Advise Emergency Controller Brief Emergency Services on arrival Establish cordon at Old Maitland Rd intersection 	<ul style="list-style-type: none"> UHF Radio Mobile Phone Verbal
Deputy Chief Warden	<ul style="list-style-type: none"> Fulfil duties of Chief Warden in absence Conduct roll call at muster point 	<ul style="list-style-type: none"> As above
Area Wardens	<ul style="list-style-type: none"> Ensure all staff evacuated in area of responsibility 	<ul style="list-style-type: none"> Conduct sweep of area
Incident Controller	<ul style="list-style-type: none"> Alert Emergency Services Establish site cordons Alert neighbouring facilities Ensure evacuation complete Advise Crawfords Directors Monitor first response Coordinate Disaster Victim Registration 	<ul style="list-style-type: none"> Mobile phone Allocate traffic control duties Mobile phone Liaise with Deputy chief Warden Mobile phone As required Assist Emergency Services: visitor/contractor/employee registers
Deputy Incident Controller	<ul style="list-style-type: none"> Fulfil duties of Incident Controller 	<ul style="list-style-type: none"> As above
Emergency Controller (As defined in table:2)	<ul style="list-style-type: none"> As defined in Table:2 of this plan On notification of incident/arrival on site Crawfords 	<ul style="list-style-type: none"> Incident Controller and Deputy Incident Controller follow verbal directions given by Emergency

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	Freightlines representatives will follow all directions given by the emergency controller.	Services until they arrive on site. <ul style="list-style-type: none"> Once Emergency Services arrive on site Crawfords representatives relinquish responsibility to the Emergency Controller and assist under their direction
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TABLE 2 ROLES AND RESPONSIBILITIES - REPORTING

Event Type	Reporting Requirement	Reporting Responsibility
Fire	<ul style="list-style-type: none"> Fire and Rescue NSW SafeWork NSW ONRSR if Rail Infrastructure involved EPA if loss of containment Product owner Crawfords Directors 	<ul style="list-style-type: none"> Incident Controller or his delegate Incident Investigation Stakeholders
Explosion or Potential Explosion	<ul style="list-style-type: none"> Fire and Rescue NSW SafeWork NSW ONRSR if Rail Infrastructure involved EPA if loss of containment Product owner Crawfords Directors 	<ul style="list-style-type: none"> Incident Controller Incident Investigation Stakeholders
Major Transport Incident	<ul style="list-style-type: none"> Fire and Rescue NSW SafeWork NSW ONRSR if Rail Infrastructure involved EPA if loss of containment Product owner Crawfords Directors 	<ul style="list-style-type: none"> Incident Controller Incident Investigation Stakeholders
Loss of Containment	<ul style="list-style-type: none"> SafeWork NSW if DG involved ONRSR if Rail Infrastructure involved EPA if pollutant, DG or Hazardous Goods involved Product owner Crawfords Directors 	<ul style="list-style-type: none"> Incident Controller Incident Investigation Stakeholders
Subversive Activity	<ul style="list-style-type: none"> NSW Police SafeWork NSW ONRSR if Rail Infrastructure involved EPA if loss of containment 	<ul style="list-style-type: none"> Incident Controller Incident Investigation Stakeholders

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	<ul style="list-style-type: none"> • Product owner • Crawford's Directors 	
Natural Event	<ul style="list-style-type: none"> • Fire and Rescue NSW • Product owner • Crawford's Directors 	<ul style="list-style-type: none"> • Incident Controller

7. POLLUTION INCIDENT HAZARDS

HAZARDOUS MATERIALS ON SITE

Hazardous materials and Dangerous Goods used or stored on site are listed in Section 9 Table 3.

Ammonium Nitrate:

Crawford's Freightlines Sandgate site is classified as a Major Hazards Facility due to the storage of Ammonium Nitrate on the site, the Ammonium Nitrate is stored in bulka bags typically 1.2 tonnes net weight. Ammonium Nitrate is an effective fertiliser, therefore it is regarded as a potential pollutant. The storage and handling of Ammonium Nitrate is strictly controlled by Standard Operating Procedures and is subject to regular scrutiny by audit and reporting requirements from regulators and Crawford's customers alike.

Any loss of containment of Ammonium Nitrate on the site would be accidental, most likely through the handling of bulka bags of Ammonium Nitrate within Stores A and B, or when loading/unloading trucks transporting Ammonium Nitrate.

Care must be taken to ensure spill ingress to waterways is avoided.

Diesel Fuel:

Diesel is used on site to fuel trucks, forklifts, various plant such as front-end loaders, and trains arriving/departing the site. The diesel is stored in an above ground self-bunded tank.

Loss of containment of diesel is most likely due to accidental damage to vehicle or plant fuel tanks.

Lubricating Oils and Hydraulic Fluids:

Oils and hydraulic fluids are used for maintenance and servicing of plant, vehicles and equipment stationed at the site. The majority of the servicing work is performed within the workshop area on a concrete floor. Plant that is too large to drive into the workshop is maintained and serviced on an external concrete hardstand area adjacent to the western wall of the workshop.

Aside from minor accidental spills during servicing and maintenance work, the most likely cause of loss of containment would be through catastrophic failure of hydraulic hoses or oil seals/gaskets.

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Aluminium Smelting By-Product

Aluminium smelting by product commonly known as Tapped Bath is stored in bulka bags each typically 1 tonne net weight. The product is classified as a Marine Pollutant for transport by sea.

Any loss of containment of Tapped Bath on the site would be accidental, most likely through the handling of bulka bags of Tapped Bath within Store C, or when loading/unloading trucks transporting Tapped Bath.

Care must be taken to ensure spill ingress to waterways is avoided.

8. PRE-EMPTIVE ACTIONS

In addition to staff training and competency assessments in Risk Assessments and Standard Operating Procedures specific to each product listed below. There are a number of pre-emptive actions employed and documented in the Standard Operating Procedures for each potential environmental pollution risk. These are detailed in the following sections of the plan.

8.1 Ammonium Nitrate

- Stored in dedicated Ammonium Nitrate storage warehouses
- Decanting operations performed within warehouses
- Spill kits located in warehouses
- Fire-fighting water is directed to retention ponds, automatic pump out can be manually overridden
- Strictly controlled product distribution protocols and stock accountability
- All losses of containment of Ammonium Nitrate are recovered by sweeping and containing the product dry.
- Under no circumstances is hosing away of spilt Ammonium Nitrate permitted
- Daily and weekly inspections of storage areas
- Equipment prestart checks

8.2 Diesel Fuel

- The diesel is stored in an above ground self-bunded tank
- All refuelling operations are performed on bunded refuelling “pads” which are located remotely from stormwater drains
- Hydrocarbon spill kits are located at each refuelling location for use in an emergency situation
- Hydrocarbon spill kits are located at each refuelling location for use in an emergency situation
- Regular depot environmental inspections

8.3 Lubricating Oils and Hydraulic Fluids

- Oils and hydraulic fluids are stored in bunded areas of the maintenance workshop located adjacent to the southern perimeter of the site
- A quantity of hydrocarbon spill kits and dry absorbent material is maintained in the workshop to manage minor fluid spills
- Equipment prestart checks

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8.4 Aluminium Smelting By-Product

- There is no decanting performed on site, any loss of containment would be accidental
- All losses of containment of Tapped Bath are recovered by sweeping and containing the product dry.
- Under no circumstances is hosing away of spilt Tapped Bath permitted.
- Spill kits available in store

9. INVENTORY OF POLLUTANTS

TABLE 3 POTENTIAL POLLUTANTS

Chemical or Common Name	DG Class	UN No.	HAZCHEM Code	Maximum Inventory	Storage Type	Location Reference
Ammonium Nitrate	5.1	1942	1Y	4500 tonnes per store	Enclosed warehouse	A Shed & Shed B
Diesel Fuel	C1	N/A	N/A	66,000 litres	above ground tank	corner of Lot 12
Diesel Fuel	C1	N/A	N/A	Variable	Trucks, plant & equipment train locomotives	Whole of site
Lubricating Oil	None	None	None	400 litres	Consumables container	Container storage area
Hydraulic Fluid	None	None	None	400 litres	Consumables container	Container storage area
Smelting by product Tapped Bath	9	3077	2Z	2000 tonnes	Enclosed warehouse	C Shed

10. SAFETY EQUIPMENT AND HARM MINIMISATION

Emergency resources for use in a site emergency are listed in the following table 4 and table 5

Facility Emergency Control Centre

The FECC shall be situated in Crawfords Operations Office. An alternative FECC location is the Emergency Controllers grab bag located in the Emergency Controllers vehicle. The following information and equipment shall be retained in the FECC by the Chief Warden:

- Site Emergency Plan (ERP)
- Site Pollution Incident Response Management Plan (PIRMP)
- Current SDS
- Site plans
- Current manifest quantities

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- Emergency Contact numbers
- UHF radios
- Mobile telephone
- Vehicle and equipment keys

TABLE 4 EMERGENCY RESOURCES

Function	Resources	Location
Emergency Notification	UHF Radio /Mobile phone Land line	Area Wardens Chief Warden Deputy Warden Emergency Controller Deputy Emergency Controller Neighbouring Facilities
Spill Recovery and Flood Mitigation Inventory	<ul style="list-style-type: none"> • Bulk Ammonium Nitrate vehicles • Forklifts/ Front End Loader • 980m 250 micron polythene • Diesel sump pumps • 4 person boat • Emergency Response Plan • Emergency Response Guide • Pollution Incident Response Management Plan • Safety Data Sheets • Brooms x 2 • Shovels x 2 • Wheel Barrow • Dam boom • 1 x pallet sandbags • 1 x pallet dryorb • 1 x Hydrocarbon spill kit • Diesel Pump • Pressure washer & 35mm hose • Fire Monitor & 4 x hoses 	Based at facility Ammonium Nitrate stores Ammonium Nitrate stores Ammonium Nitrate stores Based at facility Based at Facility Emergency Response Container

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	<ul style="list-style-type: none"> PPE-Goggles, sperm suits, gloves & gumboots 	
Transport	Light vehicles including utilities and passenger vehicles	Based at facility
Control Room	Initially operations office, would become mobile in the event of an incident escalation	Operations office based at facility, Incident Controllers light vehicle to be used as mobile control room

TABLE 5 EMERGENCY EQUIPMENT

Equipment Type	Location
Hydrant booster and backflow control Sprinkler system booster	Adjacent to weighbridge
External Hydrants	C Shed East and West walls D Shed All external walls A and B Sheds North and South Walls
Hose Reels	Located adjacent to store emergency exits
Lay flat hose, branch pipe and stortz fittings	Adjacent to Hydrants
Dry Chemical Extinguishers	All forklifts All heavy vehicles All DG Trailers All Stores Internal all administration buildings
Standard response sprinkler system	All AN Stores
Emergency Warning System	All Buildings
Heat and Smoke Detection	General Store/Mechanics and Admin/Amenities Buildings
Generator Sets	Depot operations areas
Power Isolation	Western end of car park
UHF Radios	Operations office Warden work areas
Vests	Warden work areas

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11. CONTACT DETAILS

Emergency contact details including neighbouring facility contacts are listed in Table 6 on the following page.

Note a general Emergency Contact Listing is appended to the site ERP as Appendix D. Amendments to the site ERP Emergency Contact Listing must be reflected accurately in Table 6 of the PIRMP.

Responsibility for maintaining an accurate contact list is assigned to Crawfords Freightlines HSSE Manager.

TABLE 6 CONTACT DETAILS

EMERGENCY SERVICES / SECURITY CONTACTS	
SERVICE	PHONE
Police / Fire / Ambulance	000
State Emergency Service (SES)	132 500
RMS Transport Management Centre	131 700
ARTC (RAIL) Emergencies 1. Train Transit Manager (TTM) 2. Lower Hunter Network Controller	02 4902 9490 02 4902 7969
Nation Security Hotline	1800 123 400
Crawfords 24hr Response Line	1800 210 694
Crawfords Public Complaints Line	1800 218 615
Crawfords Sandgate 24hr Security	0490 531 000

EMERGENCY CONTACTS: CRAWFORDS			
LOCATION	CONTACT	PHONE	AFTER HOURS
Emergency Response	Crawfords 24hr Response	1800 210 694	1800 210 694
Public Complaints Line	Crawfords 24hr Contact	1800 218 615	1800 218 615
Incident Controller	Mark Grech	0427010838	0427010838
Chief Fire Warden	Brian Littlewood	0408 582 476	0408 582 476
Deputy Incident Controller	Terry Roberts	0491 082 121	0401 050 429
Deputy Fire Warden	James Bowen	0437 733 555	0437 733 555
Managing Director	Peter Crawford	0429 010 111	0429 010 111

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EMERGENCY CONTACTS:		NEIGHBOURING FACILITIES	
St Josephs Home	4967 0600	0417 022 643	(Helen Gaynor)
Calvary Independent Living Units	49541802	0477 306 704 0477 376 381	(Liz Jacobs) (Michelle Jenkins)
Adbri Masonry	4967 3844	0418 684 558	(Mark Durbridge)
HL Mullane	4960 8999	0490 673 660	(Kathy Clarkson)
Golf Range	4951 2692	0409 661 801	(Rick MacLean)
Clean Valley (Sibelco)	4964 8942	0418 649 266 0412 366 3345	(Wendy) (Simon Livingston)
Daracon Construction	043 354 518	0439 354 518	(Peter Hibbert)

12. NOTIFIABLE POLLUTION INCIDENT

A notifiable pollution incident is defined as being an occurrence that causes or has the potential to cause material environmental harm. As a guide, a pollution incident is notifiable if it is an uncontrolled release or movement of a pollutant into a waterway or unsealed surface or crosses the site boundary. Examples of notifiable incidents include:

- A spill impacting 2HD swamp.
- A spill with potential to impact Iron Bark Creek.
- A significant oil spill on an unsealed surface.
- A significant diesel spill on an unsealed surface.
- A chemical spill.
- A major fire event.
- An explosion.

If the Emergency Controller is unable to establish whether the incident is a notifiable Pollution Incident, the EPA should be notified as a precautionary measure.

13. NOTIFICATION

An Emergency Contact listing is located on the previous page.

14. ACTIONS DURING AND AFTER INCIDENT

14.1 General Spill Response Requirements

In the event of a spill in a warehouse, loading / unloading area or yard area:

Refer to specific product Safety Data Sheet

14.1.1 Identify and Control

- The person identifying a spill shall advise their immediate supervisor.

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- The supervisor shall inform the Incident Controller.
- Response management persons shall ensure no run off to sensitive areas by use of bunding, earth damming or other suitable means of containment such as booms or pads.
- All spills shall be recovered as soon as possible - note if the spill involves hazardous materials assistance from Emergency Services will be requested by ringing 000.
- Casualties must be assessed to determine if medical assistance is required.
- Clear area of personnel not required to manage the emergency.
- Use dry clean up procedures and avoid generating dust.
- Wear protective clothing, gloves, safety glasses and dust respirator.
- Place recovered materials in suitable containers for disposal.
- Do not contaminate recovered material with fuel, organic materials, or other chemicals.
- SSAN spills shall also be managed in accordance with TERP and Site Security Plan

14.1.2 Response

- The person raising an alarm shall do so by reporting the situation to the Chief Warden
- After hours emergencies shall be communicated directly to the Incident Controller or in his absence the Deputy Incident Controller by mobile phone.
- The Incident Controller or Deputy Incident Controller shall assess the situation and alert Emergency Services in accordance with 9.2 Levels of Emergency.
- The Chief Warden on duty shall assess the situation and either despatch a response team or initiate the Emergency Procedure by alerting area wardens to evacuate the area
- The Chief Warden shall notify the Incident Controller or in his absence the Deputy Incident Controller
- In the event of an evacuation the Chief Warden shall advise other site users to evacuate
- Area Wardens shall arrange the movement of all personnel to a remote Muster Point dependant on the prevailing wind direction and conduct a roll call

14.1.2 Emergency Muster Points

Incident Controller/Deputy Incident Controller will:

- Instruct wardens (Chief & Area) to direct staff to meet at Muster Points.
- The Chief Warden will conduct roll call to ensure all staff are accounted for. Staff will follow direction from Incident Controller, if incident declared critical, on direction from Incident Controller access private vehicles and exit site in orderly fashion directly to the Evacuation point at McDonalds Carpark Hexham.
- Chief Warden will conduct a secondary roll call at Evacuation Point to ensure all staff have evacuated Sandgate Terminal and are accounted for.
- Notify neighbouring facilities (Emergency Contact List)
- No access permitted to site until Emergency Services or the Incident Controller has declared the site is safe to re-enter.

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All Staff

- All staff will meet at Muster Points and the Chief Warden will conduct roll call to ensure all staff are accounted for. Staff will follow direction from Incident Controller, if incident declared critical, on direction from Incident Controller access private vehicles and exit site in orderly fashion directly to the Evacuation Point at McDonalds Carpark Hexham.
- If incident is not of a critical nature, await direction from Incident Controller or Emergency services advising site is declared safe to re-enter.

14.1.4 Reporting

- Pollution incidents shall be reported to the Environmental Protection Agency in accordance with the Protection of the Environment Legislation Amendment Act 2011.
- The Incident Controller, or in his absence the Deputy Incident Controller is responsible for the reporting of incidents
- As soon as practically possible following the handover of an incident scene to Crawfords Incident Controller or his deputy, the pollution incident shall be reported to NSW EPA by calling 131 555.

1. TREATMENT OF SPILL TYPES

15.1 Sealed Surface Areas

1. Block inlets to nearby surface water drains and sewers with a physical barrier such as:
 - absorbent boom or sock;
 - drain seal covers;
 - a mound of absorbent material such as earth or spill sorb
2. Where possible isolate the source of the spillage
3. Wearing the correct PPE, scoop or shovel as much pooled substance as possible into a container or containment area for disposal
4. Label the container with the appropriate markings – refer SDS for guidance
5. In the case of a wet spill, once the spill is removed apply absorbent material to the spill area
6. In the case of a dry spill, sweep the area with an approved broom and place the sweepings in an approved recovery bag
7. Once all the wet spill has been removed, shovel absorbent into an approved recovery container and request disposal instructions
8. Do not hose down contaminants or excess absorbents into drains
9. Follow incident reporting protocols

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15.2 Unsealed Surface Areas

To remove any contaminants that is absorbed into unsealed surfaces and prevent further contamination, the following steps are to be followed.

1. Block inlets to nearby surface water drains and sewers with a physical barrier such as:
 - absorbent boom or sock;
 - drain seal covers;
 - a mound of absorbent material such as earth or spill sorb
2. Where possible isolate the source of the spillage
3. Wearing the correct PPE, scoop or shovel as much pooled substance as possible into a container or containment area for disposal
4. Label the container with the appropriate markings – refer SDS for guidance
5. Excavate the contaminated soil
6. Store the contaminated soil in a containment area on site until arrangements have been made for disposal. The containment area should be concrete or plastic lined
7. Contact the HSSE Manger for disposal instructions
8. Significant spills may require collection and analysis of soil samples from the site of the spill recovery, the HSSE Manager will advise regarding this requirement
9. When advised by the HSSE Manager, backfill the excavated area using clean fill material
10. Follow incident reporting protocols

15.3 Spill Adjacent to Wetlands

To prevent environmental harm to sensitive aquatic environmental receptors, the following steps should be followed.

1. Immediately cease all activities in the area. Advise the HSSE Manager
2. Where possible isolate the source of the spillage
3. Place booms or absorbent socks adjacent to and on the downslope of the spill area to prevent further movement of the contaminant
4. Place booms or absorbent socks adjacent to affected wetlands areas
5. Request further instructions from the HSSE Manager

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16. SITE LOCATION AND SURROUNDING INFRASTRUCTURE

Figure 1 shows the location of the site (outlined in yellow) with neighbouring industrial and residential infrastructure.

Figure 1 Site Location



17. PLAN TESTING TRAINING AND REVIEW RECORDS

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The PIRMP shall be reviewed at least annually, or prior to a new process or potential contaminant being introduced to the site, or as the result of a plan test.

1. Plan testing shall initially be in the form of a table top review and test, then field tested annually, or within 1 month of a pollution incident occurring.
2. Review and testing participants must include the Incident Controller and appropriately selected area wardens.
3. The PIRMP may be tested and reviewed in conjunction with the site ERP.
4. Amendments, revisions and testing history shall be recorded in Table 7 Testing and Revision History.

18. AVAILABILITY OF THE PIRMP

A master copy of the PIRMP shall be maintained in Crawfords Freightlines R Drive as well as stored in the Emergency Response Container. A PDF version of the plan shall also be displayed in Crawfords Freightlines Shared Drive and in a prominent position on the Crawfords Freightlines website.

19. REVISION HISTORY

TABLE 7 TESTING AND REVISION HISTORY

Date	Test Type (Field or Desktop)	Participants	Comments Plan Amendments Required
15.04.21	Desktop	R. Tracey T. Roberts L. Peppertrees J. Conners	Desktop review: Potential diesel spill (broken hose) at Fuel Cell <ul style="list-style-type: none"> • Operator present. System shut off. Bunded hardstand • Spill kit on-hand and stocked. • UHF radio. Proximity to workshop/other staff No amendments req'd
23.03.22	Desktop	R. Tracey T. Roberts L. Peppertrees J. Conners	Desktop review: Previous scenario revisited (including rail siding – no changes required. <ul style="list-style-type: none"> • Spill kit seals checked Contact list updated Formatting changes

Document Title: Pollution Incident Response Management Plan	Author: R Tracey / T Roberts / L Peppertrees/M Grech Approved By: Mark Grech
Revision Date: 31 st May 2024	Next Review Date: 31 st May 2025

17.05.2023	Field	M.Grech R.Tracey L.Pepptrees J.Connors C.Trees P.Crawford A.Thompson	Field Review based on Rocsil Foam LS1 Component (Resin) incident-loss of containment. <ul style="list-style-type: none"> • Contact list updated. • Emergency Controller and Deputy Emergency Controller titles changed to Incident Controller and Deputy Incident Controller • Muster Point information updated • Emergency Controller role added to Table:1 • Emergency Response container Inventory updated - Table:4 • Emergency Response Container – Audit against inventory -Table:4 required every 6 months or each time after use
05.04.2024	Field	M.Grech L.Peppertrees T.Roberts	Field test based on EPA alert notification Wet Weather forecast preparation and recommendations and review of entire plan. The PRIMP has been assessed adequate based on an inspection based on the EPA suggestions in the alert.
31.05.2024	Desktop Review	M.Grech L.Peppertrees T.Roberts	Annual review of Plan. Updated Deputy Fire Warden name and contact details. No additional amendments required.