

# Pollution Incident Response Management Plan (PIRMP) for Mobile Oil Polish Plant (MOPP)

## ReOil Pty Ltd

EPL- 12555

Currently Located 41 Kyle st Rutherford

Version	Revision description	By	Date
20210914	Initial document	S. Panquet	14 Sep 2021
20220223	Minor text updates / formatting	A.Steynberg	23 Feb 2022
20230116	Update now that the MOPP is under Cleanaway EPL	S. Panquet	16 Jan 2023

# When To Use This Plan

## Box 1.3: When does notification need to be given of a pollution incident?

Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm is defined in section 147 of the POEO Act as:

'(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.'

Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2).

Section 148 of the POEO Act sets out additional pollution incident notification requirements.

In summary, the licensee (or another person) is required to report a pollution incident *immediately* to:

- the EPA
- the Ministry of Health (via the appropriate Local Health District Public Health Unit)
- Fire and Rescue NSW
- SafeWork NSW
- the relevant local council.

The dictionary meaning of *immediately* is promptly and without delay. This allows response agencies to know as soon as a pollution incident is identified, so it can be dealt with quickly. The EPA's [Protocol for industry notification of pollution incidents](#) provides more details about this.

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 21402

**Approved by:** Antony Steynberg

**Position/Title:** Technical Director ReOil PTY LTD

**Signature:** *Antony Steynberg*

**Date:** 14/9/2021

### PURPOSE:

ReOil PTY LTD operates process machinery on the Cleanaway Rutherford Site, who holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for MOPP (Mobile Oil Polish Plant), currently operating at 41 Kyle street Rutherford. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Licencees should also refer to the EPA's *Guideline: Pollution incident response management plans*.

## Environment Protection Licence (EPL) Details

<b>Name of licensee:</b>	Cleanaway Refiners PTY LTD
<b>EPL number:</b>	12555
<b>Premises name and address:</b>	41 KYLE STREET, RUTHERFORD, NSW, 2320
<b>Company or business contact details</b>	<b>Name: Nick Welbourne</b> <b>Position or title:</b> Engineer <b>Business hours contact number/s:</b> 0435968176 <b>After hours contact number/s:</b> 02 4939 1150 <b>Email:</b> <a href="mailto:nick.welbourne@cleanaway.com.au">nick.welbourne@cleanaway.com.au</a>
<b>Website address:</b>	<a href="https://www.cleanaway.com.au/">https://www.cleanaway.com.au/</a>
<b>Scheduled activity/activities on EPL:</b>	Mobile Waste Processing
<b>Fee-based activity/activities on EPL:</b>	Mobile Waste Processing

## Pollution incident – person/s responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.

<b>PIRMP activation</b>	<b>Name: Antony Steynberg OR Sebastien Panquet</b> <b>Position or title: AS:</b> Technical Director, <b>SP:</b> Chemical Process Engineer <b>Business hours contact number/s: AS:</b> 0439072644, <b>SP:</b> 0448189107 <b>After hours contact number/s: SP:</b> 0448189107, <b>AS:</b> 0439072644, <b>Email:</b> <a href="mailto:Antony@reoil.com.au">Antony@reoil.com.au</a> , <a href="mailto:Sebastien@reoil.com.au">Sebastien@reoil.com.au</a>
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## Pollution incident – person/s responsible, continued

### Notifying relevant authorities

Notification should be made by a person with an appropriate level of authority within the company.

**Name:** Antony Steynberg  
**Position or title:** Technical director  
**Business hours contact number/s:** 02 4049 2304  
**After hours contact number/s:** 0439072644  
**Email:** [admin@reoil.com.au](mailto:admin@reoil.com.au) / [antony@reoil.com.au](mailto:antony@reoil.com.au)

### Managing response to pollution incident

**Name:** Sebastien Panquet or Antony Steynberg  
**Position or title:** **AS:** Technical Director **SP:** Chem Process Engineer  
**Business hours contact number/s:** **AS:** 0439072644, **SP:** 0448189107  
**After hours contact number/s:** **SP:**0448189107, **AS:** 0439072644,  
**Email:** [Antony@reoil.com.au](mailto:Antony@reoil.com.au), [Sebastien@reoil.com.au](mailto:Sebastien@reoil.com.au)

## Notification of relevant authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.

Relevant authorities include:

1. Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (first notification)
2. EPA – 131 555
3. NSW Health (nearest public health unit)

See [www.health.nsw.gov.au/Infectious/Pages/phus.aspx](http://www.health.nsw.gov.au/Infectious/Pages/phus.aspx) for local contact details.

4. SafeWork NSW – 131 050
5. Local authority (usually the local council) in which the pollution has occurred.

Note: The local council and public health unit will vary depending on the location of the pollution incident. For mobile plant licences the PIRMP will need to include the person or people who are responsible for identifying the local authority and nearest public health unit.

<b>Fire &amp; Rescue NSW / Rural Fire Service (RUTHERFORD FIRE STATION)</b>	<b>Contact number/s:</b>	000 (or 40154055 without immediate threat)
<b>EPA</b>	<b>Contact number/s:</b>	131 555
<b>NSW Health</b>	<b>Relevant Area Health Service:</b> <b>Contact number/s:</b>	John Hunter Public Health Officer 4924 6477
<b>SafeWork NSW</b>	<b>Contact number/s:</b>	131 050

## Notification of relevant authorities, continued

### Local authority/s (*MAITLAND COUNCIL*)

Identify the local authority for the area in which the premises to which the environment protection licence relates, and any area, is affected, or potentially affected, by the pollution.

Contact number/s:

02 49349700

### Hunter Water

Contact number/s:

1300 657 000

### Department of Planning an industry and Environment

Contact number/s:

1300 305 695

### Operator of Mobile Plant to identify local authority and nearest Public Health unit

Contact number/s:

0448189107

## Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):  
Cleanaway Refiners PTY LTD

Details of how the neighbours will be informed of the incident, including early warnings and regular updates (e.g. door knock, phone call, emergency alert):  
Mobile Plant located inside Cleanaway Refiners Plant (Restricted Access Area). Operators onsite will be informed either in person or over phone

## Description and likelihood of hazards

Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:

1. Spill outside of MOPP bunded area
2. Stack emissions exceed allowable specs per licence
3. Fire/ explosion

Identify the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood:

1. Low Likelihood. MOPP has multiple levels of protection against spills, including a final failsafe, double alarmed bund, triggered with only a small percentage of bund capacity. Feed Valve to MOPP closes upon bund trip. Outlet from MOPP is one-way. Connections between MOPP bund and Cleanaway bund are pressure tested, stainless steel braided hose. All Sample points are inside MOPP bund with lockable vales and point down (not out of bund). Bund Drains are lockable valves and are plugged. In the case of a ruptured tank inside the MOPP, the doors are closed by default, so a sideways gush of liquid will not escape the bund. This same principle applies to a broken pipe.
2. Low Likelihood. Emissions will be checked formally as per EPL requirements. Extra precautions taken by ReOil include a Zirconia oxygen sensor in the stack, to monitor effectiveness of emission treatment including catalytic converter. Falling outside of spec results in immediate stop of emission.
3. Low Likelihood. The MOPP operates with checks and interlocks to prevent oil coming into contact with temperatures above 100C (flash point is ~180C) outside of the specific conditions for sorbent reactivation. This control will help to ensure there is no opportunity for fire outside of the specifically controlled combustion within the columns. In the event of a power failure during a fire, the Cleanaway plants fire suppression system is diesel backup based

## Pre-emptive actions to be taken

Provide detailed descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises:

1. Oil spills inside MOPP bund are cleaned immediately with sorbent spill pads and where appropriate also bio degreaser. This is to ensure oil is not tracked out of the bund during entry and egress. After an internal spill is cleaned, there will be spill pads from our spill kit stuck to the floor outside the internal access to the MOPP to allow for boots to be cleaned of oil. Cleanaway have a system for reusing oil that is spilled into bund or drained from pipes into buckets, this easy-to-use system helps ensure no shortcuts are taken. Appropriate procedures have been developed for the depressurising and draining of the MOPP
2. The Oxygen sensor has been installed, and the PLC code performs a “health check” on the sensor before allowing a reactivation to begin, to ensure the reading from the sensor is reliable. ReOil has installed a handrailed area on the roof of the MOPP and a chest height, arms-reach sample point for stack testers. Facilitating easy access will help with maintaining a proper system of effective and regular testing.
3. The MOPP has 2 fire extinguishers fitted to provide quick relief in the event of a small fire, before it can expand. The E-stop will remove all motor/heater power to the unit, as well as withdraw the remote permissive to prevent auto restarts. This action will also trigger fail safe isolation from the site tank farm. In the event of a large fire, the power will be isolated at the site MCC. The site has many break-glass fire alarms. The Cleanaway site has 6 fixed firefighting foam cannons at strategic locations, as well as many site suitable fires extinguishers.

The MOPP has many alarms which are designed to fail safe stop operation and will be triggered under abnormal conditions. The MOPP is designed to run without direct supervision 24/7 with remote monitoring capability.

## Inventory of pollutants

### Provide an inventory of potential pollutants on the premises or used in carrying out the activity to which the licence relates:

Identify the maximum quantity of any pollutant/s likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates.

Location/Tank	Max. quantity	Contents	Comments
Buffer tank Clean section	2000 L	CWR150 GII Base Oil	
Sorbent Columns	12x 180L	Sorbent Media	
Buffer tank Dirty section	500 L	CWR150 GII Base Oil Combustion products including water	

## Safety equipment

Describe the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident:

PPE: Site rules require all staff are in long sleeve high vis, high vis pants, carry cut proof gloves and wear safety glasses and eye protection. A H2S monitor is carried at all times on the Cleanaway site. Multi-gas meters are carried for hot-work.

For work around oil, oil proof gloves are used.

There are Fire extinguishers mounted to the rear entrance of the MOPP.

## Communicating with neighbours and the local community

Identify details of the mechanisms for providing early warnings and regular updates to owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried out:

There is a continuous live communications system setup between the MOPP and the Cleanaway site control room. The status of the MOPP is visible at all times with real time feedback. MOPP alarm events are remotely visible to the control room without requiring contact to the MOPP. High level alarms (eg bund alarm) trigger Operator to enact a “remote estop” and to close the valve feeding oil to the MOPP and stop all MOPP operations.

Develop any specific information that could be provided to the community, so it can minimise the risk of harm:

The MOPP will be operating within the environment of the Cleanaway site, thus Cleanaway is considered the closest neighbour to the MOPP. CLWY have access to a panel of data, and can access, inspect and isolate the MOPP as required.

## Minimising harm to persons on the premises

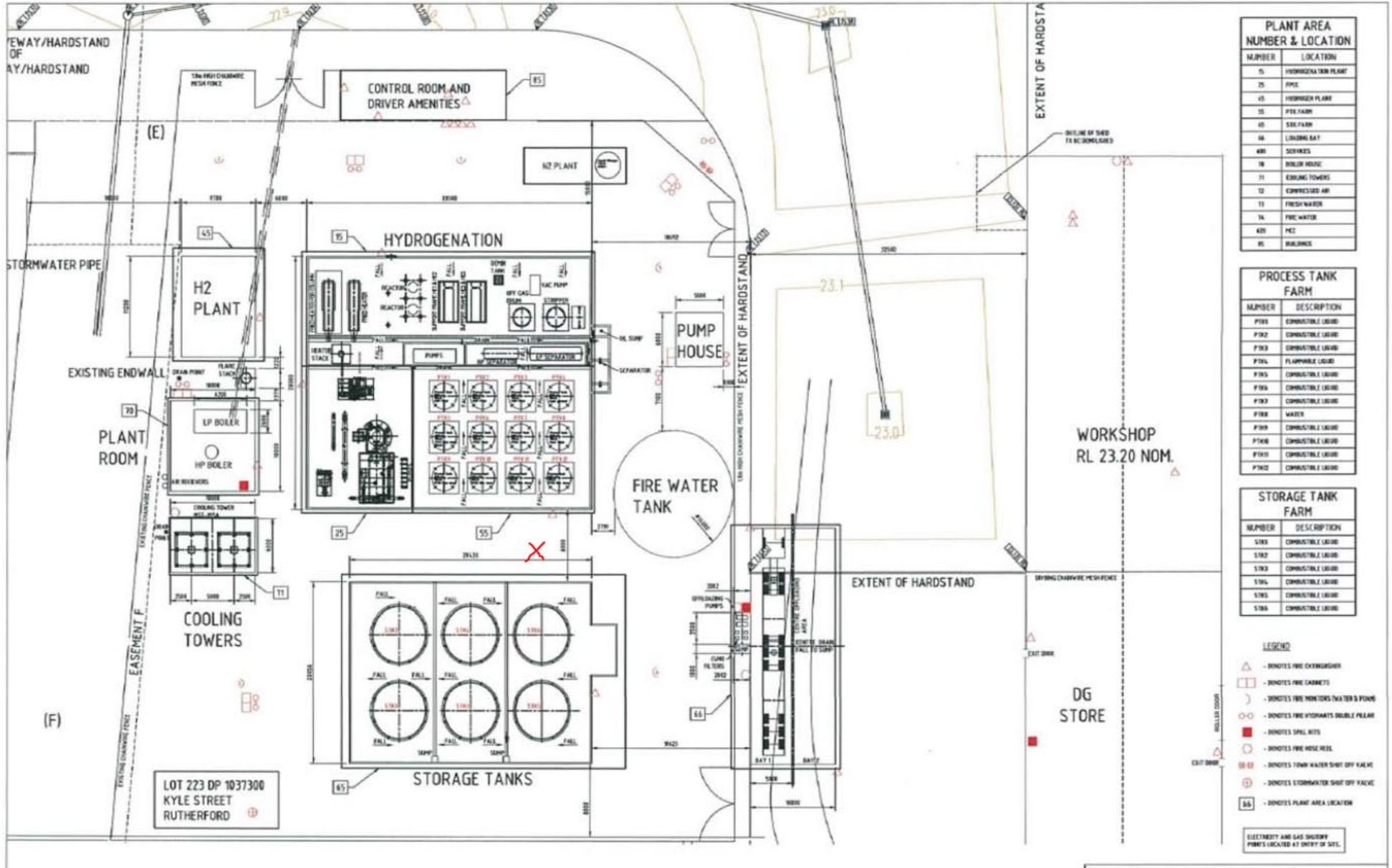
Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out: The MOPP is located inside a restricted access plant. Entry requires mandatory site induction, therefore all staff will already be familiar with site evacuation methods. The siren is tested weekly. In the event that the alarm siren is active, all employees should head across wind to the nearest exit and meet at the evacuation area. No staff member can remain in the plant without explicit permission and instruction from the operators. The plant has the potential for a fire to be the cause of an alarm, but also serious gas leaks.

In the event of a scenario occurring, before an alarm has sounded, the operator of the MOPP will need to assess. In the event of an explosion, the employee must immediately trigger the emergency fire alarm and evacuate. In the event of a small fire, it is reasonable to E-Stop the MOPP and try to control it with the available fire extinguishers, before pulling the alarm and evacuating if the fire is uncontrollable.

## Maps



MAP 1- = Cleanaway Plant (MOPP marked with Red X)



MAP 2- Cleanaway Plant and Surrounding Area

Green shows nearest stormwater drain.

Red Shows Cleanaway plant, Yellow Dot shows MOPP



## Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident:

Spills, When safe to do so:

- Raise alarm, stop the MOPP via estop. This will limit flow of oil significantly.
- Stop the direct source of spill (close manual valve etc)
- Retrieve spill kit
- Ensure you are wearing appropriate PPE (may need oil proof gloves or face shield)
- Confirm spill material and check SDS if unfamiliar with the spill. (this should not be a problem for the MOPP oil)
- Contain the spill
- Clean Up: Spills are to be cleaned with absorbent pads, spill kits or sand. Spent absorbent products are to be placed in an empty drum for correct processing. Outside of bunded areas, hoses should not be used, so prevent washing spill into the soil, stormwater or sewerage.
- Incident reporting and post event investigation and review

Air Pollution

If the stack's controls fail to prevent the release of improperly treated exhaust, the operator is to immediately e-stop the skid. The contacts in this PIRMP should be notified and the operation of the MOPP ceased until the cause investigated.

Minor Fire:

- A small fire can be attempted to be stopped with the fire extinguishers located on the MOPP. This is acceptable for small, controllable events, such as an oily rag catches on fire. If successful, the MOPP must be e-stopped and the Cleanaway operators must be immediately informed. If the fire cannot be extinguished quickly, it is considered the start of a serious fire and the instructions below should be followed.
- Incident reporting and post event investigation and review

Serious Fire/ Explosion

- The break-glass alarm for fire should be done immediately. This will inform Cleanaway of the incident and start the siren.
- Workers near the MOPP should head directly for the exit as per standard site emergency rules.
- Power should be removed from the MOPP by an operator in the MCC.
- The emergency services will be automatically called by using the break-glass. This will also start Cleanaway's fire suppression system.
- Evacuation protocol will have all staff come together at the front gate, unable to re-enter without permission from emergency services
- Incident reporting and post event investigation and review

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Develop a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk:

In terms of human health, the main concern is the fire/explosion risk. The MOPP operator and nearby workers will see this quickly and we able to leave and trigger the break-glass. This triggers the site-wide evacuation alarm. This includes the office staff in nearby buildings on site.

In all cases incidents will be reported, investigated and reviewed to improve safety of persons and environment as well as reliability of the operations.

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## Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified:

The immediate safety aspects must be addressed first, eg, contain the spill, alert the Cleanaway operators, evacuate the site etc.

Then once the spill is contained, the fire controls in place, and the staff safety evacuated, the list on page 5&6 should be called through, to alert the necessary parties of the incident.

Identify the person/s through whom all communications are to be made:

As listed on page 4, Antony Steynberg is the technical director for ReOil. Sebastien Panquet is the 24hr contact for the MOPP. At least one of these people should be contacted.

## Staff training

Identify the nature and objectives of any staff training program in relation to this plan:

ReOil staff operating the MOPP have both developed the operation of the plant and all its paperwork and are extremely familiar with the MOPP's procedures. Close calls and near misses form a part of the weekly reporting for the MOPP's operation. ReOil staff have received suitable basic fire fighting training for emergency situations. Site inductions for CLWY are maintained for employees as well as contractors which includes information related to emergency protocols, emergency exists, location of spill kits and fire extinguishers.

## Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.

- The PIRMP test has been scheduled for annual review and sign off.

Detail the manner in which the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

- The PIRMP will be verified via a mock incident which would require action. This will be tested and signed off and recorded in the maintenance register.

Detail how the testing is documented and recorded (this must include the testing dates and the names of all staff members who carried out the testing):

- ReOil maintains a spreadsheet document, specifically for EPL compliance. This spreadsheet contains a register of any updates to the PIRMP, as well as a record of when tests were carried out, as well as findings. Importantly, this also notes the date for the next test.