

JEMALONG IRRIGATION LTD

**POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN**

AMENDED 31/5/2023

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 5102

Approved by **Matthew Toohey**
Position/Title: **Environmental Officer**

Signature:
Date: **31st May 2023**

PURPOSE:

Jemalong Irrigation Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Jemalong Irrigation Ltd. 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

Name of licensee: (including ABN)	Jemalong Irrigation Ltd (ABN 76 067 197 782)
EPL number:	5102
Premises name and address:	Jemalong Irrigation Ltd 1805 Lachlan Valley Way, Forbes, NSW, 2871
Company or business contact details	Name: Neil Toole Position or title: General Manager Business hours contact number/s: 02 6857 4201 After hours contact number/s: 0415 559 768 Email: admin@jemalong.net.au
Website address:	www.jemalongirrigation.com.au
Scheduled activity/activities on EPL:	Irrigated Agriculture
Fee-based activity/activities on EPL:	Irrigated Agriculture

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.

PIRMP activation	Name of person responsible: Matthew Toohey Position or title: Environmental Officer Business hours contact number/s: 02 6857 4201 After hours contact number/s: 0450 878 889 Email: enviro@jemalong.net.au
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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 of person responsible: Neil Toole Position or title: General Manager Business hours contact number/s: 02 6857 4201 After hours contact number/s: 0415 559 768 Email: admin@jemalong.net.au
Managing response to pollution incident	Name of person responsible: Matthew Toohey Position or title: Environmental Officer Business hours contact number/s: 02 6857 4201 After hours contact number/s: 0450 878 889 Email: enviro@jemalong.net.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 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.

Fire & Rescue NSW / Rural Fire Service	Contact number/s:	Forbes Fire Station 02 6851 1843
EPA	Contact number/s:	131 555
NSW Health	Relevant Area Health Service:	Forbes District Hospital
	Contact number/s:	02 6850 2000
SafeWork NSW	Contact number/s:	131 050

Notification of relevant authorities, continued

Local authority/s 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:	Forbes Shire 02 6850 2300 Condobolin Shire 02 6895 1950
Any other identified organisation or agency requiring notification (if applicable) e.g. Water NSW, Department of Planning Industry and Environment, Roads and Maritime Services	Contact number/s:	Water NSW 1300 662 077

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):

Jemalong Irrigation has contact details for all members located within the Area of Operations.

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):

JIL has an up to date list of telephone contacts for every landholder in its area of operations. The landholders have been grouped according to their location in relation to the irrigation supply channels. This will enable a timely and ordered contact process to operate in the event of a pollution event occurring in or near the channel system.

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:

Airway and skin damage from chemical exposure can be a hazard to human health.

Environmental hazards include soil contamination from both chemical and fuel spills. Chemicals entering irrigation channels can cause environmental damage should the contaminated water be released onto farmland or into waterways.

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

Chemical exposure could occur if the employee failed to wear the required PPE for chemical handling.

Fuel and chemical spillage onto soil at the JIL depot would be unlikely as most areas of the depot have either concrete or bitumen as the ground base. Chemical spillage could occur in the field if correct procedures are not followed as per existing chemical handling and application of chemicals policies.

It is unlikely that bulk chemicals could accidentally enter the irrigation channel system.

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:

Employees are to ensure that they follow existing JIL policies relating to WHS and the handling and application of chemicals. JIL also has an existing Chemical Contingency Plan in accordance with their EPA licence.

The chemicals listed below marked with * are stored in a 4,500-litre poly tank located inside the chemical shed which is more than enough area to capture chemical if any leakage occurs. A minimum amount of herbicide is purchased by Jemalong Irrigation and is stored at any one time on the premises.

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.

Example

Location/Tank	Max. quantity	Contents	Comments
Underground tank Depot	2,000 litres	Distillate	
Underground tank Depot	2,000 litres	Petroleum	
Storage tank Chemical shed	1,000 litres	Amitrole	*
Storage tank Chemical shed	100 litres	2,4-D Herbicide	*
Storage tank Chemical shed	1,000 litres	Glyphosate	*
Storage shed Depot	1,000 litres	Acrolein/ Magnacide H	
Storage shed Workshop	400 litres	Engine and Transmission oils	

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:

Only JIL employees with current Chemcert accreditation are to handle and apply chemicals. JIL employees are to ensure that they are wearing the appropriate PPE when handling and applying chemicals.

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:

JIL has an up to date list of contacts for every landholder in its area of operations. The landholders have been grouped according to their location in relation to the irrigation supply channels. This will enable a timely and ordered contact process to operate in the event of a pollution event occurring in or near the channel system. Jemalong Irrigation also operates an SMS service which could be used to provide updates to members.

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: All visitors to the JIL depot are to be given an induction which includes the location of chemicals and other hazardous substances as well as evacuation procedures and muster locations.

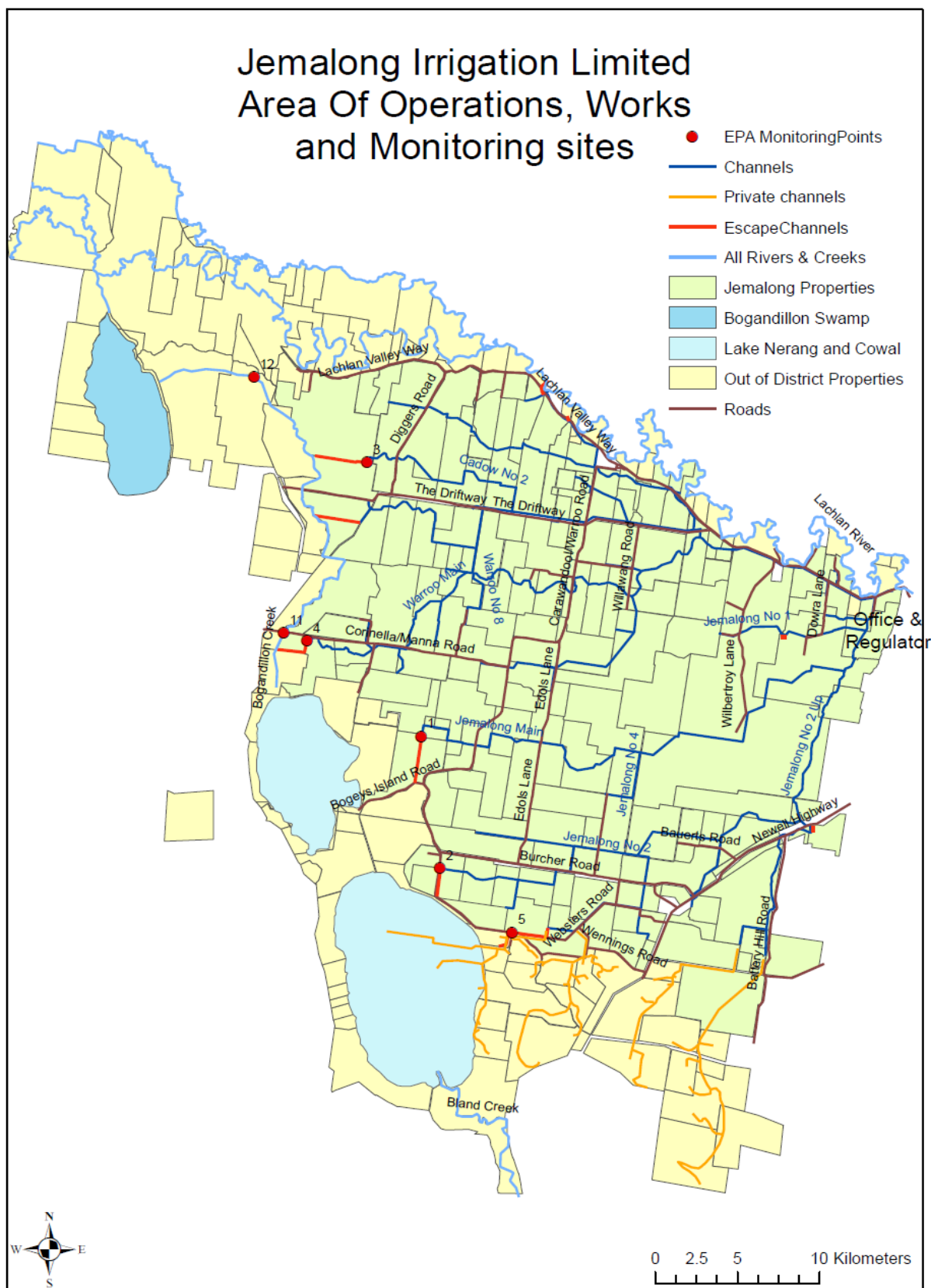
Maps

Provide a detailed map (or set of maps) showing the:

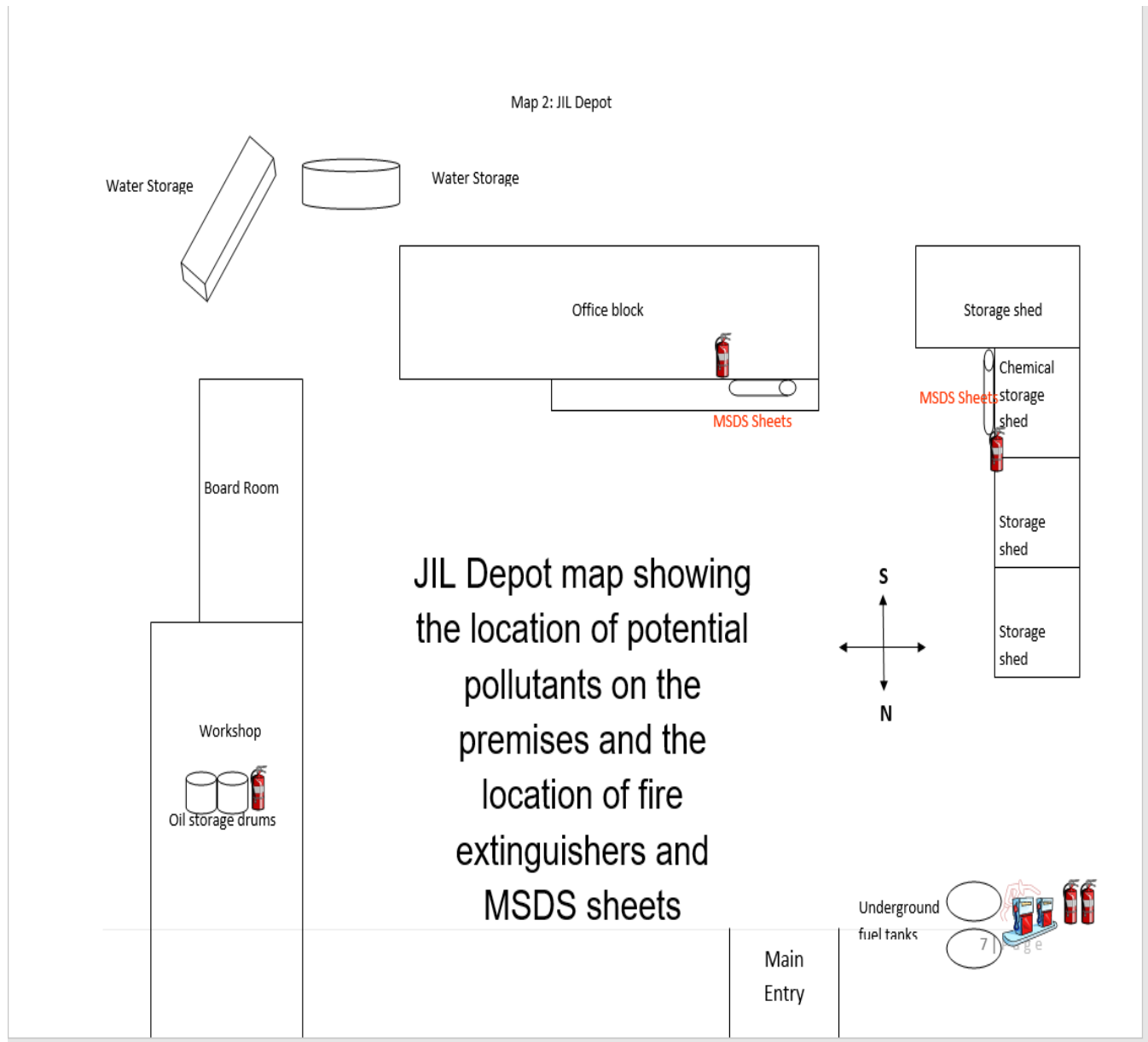
- location of the premises to which the licence relates
- surrounding area likely to be affected by a pollution incident
- location of potential pollutants on the premises
- location of any stormwater drains on the premises.

It is also recommended the position of any discharge points or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body that stormwater drains located on the premises discharge to).

Map 1: JIL Area of Operations



Map 2: JIL Depot



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:

The licence holder will contact the appropriate authorities immediately following a pollution incident. Any actions required by the authorities will be undertaken by the licence holder. Affected landholders will be contacted immediately and they will also be provided with regular updates.

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 the event of a pollution incident all relevant people that may be affected will be notified immediately by either phone or SMS. They will be provided with updates on the situation and informed of any actions being undertaken to address the pollution incident.

Coordinating with persons

Identify the procedures to be followed for coordinating with the authorities or persons who have been notified: Jemalong Irrigation employees are the first point of contact for the notification of a pollution event. The relevant authorities will be contacted by JIL employees and any further instructions from these authorities will be adhered to as required.

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

Neil Toole and Matthew Toohey

Staff training

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

The training involves each employee reading the Pollution Response Management Plan as well as the corresponding JIL policy. The employees are given scenarios based on possible pollution incidents that may occur. The employees must be able to implement the plan using these scenarios.

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.

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 plan will be tested and assessed annually on the 31st of May where management and staff will be required to read the plan and associated JIL policy. A simulated pollution event scenario will be provided to the staff to ensure that they are aware of what steps are required in the reporting of such pollution incidents. Any identified issues arising from the simulated reporting of pollution incidents will be noted and addressed. Amended plans will be printed and kept at the JIL office and uploaded to the JIL website.

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):

Detail the dates on which the plan was updated:

PIRMP testing details

Date tested	Tested by (to include the names of all people involved in testing)	Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan.	Finding of test, including issues identified	Next scheduled testing date (must be within 12 months from current test)
31.05.23	Matt Toohey, Neil Toole, Pat Nicholson, Tim Picker, David Vollmann, James Doyle	Desktop simulation – chemical spill at JIL depot (1,000 litre pod)	No issues identified	31.05.24

PIRMP update details

Date update occurred	Reason for update (e.g. address issues identified in testing, contact details/personnel have changed)	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Date of completion
22.04.20	Outdated items identified in annual testing	Contact details, chemical inventory updated	23.04.20	31.05.20
18.05.23	Outdated items identified in annual testing	Contact details updated	23.04.20	18.05.23