



Generator Property Management Pty Ltd

Kerosene Vale Ash Repositories EPL 21185
Pollution Incident Response Management Plan

INTERNET VERSION

November 2024

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1. Introduction

1.1 Status

Generator Property Management (GPM) is a small NSW Government owned specialised business that takes ownership of closed power stations sites and manages the process of remediating the sites for long term future use.

GPM was formed in 2016 following privatisation of the NSW Electricity generation industry with ownership of the Munmorah Power Station site on the Central Coast of NSW. GPM successfully managed the demolition of the original power station and is now working on the remediation and repurposing of the site.

In September 2020 GPM took over ownership of 528 Hectares of land at Lidsdale in the western Blue Mountains region. The property at Lidsdale was the area that the closed Wallerawang Power Station used for the disposal of fly ash, boiler ash, asbestos, and original power station demolition materials.

The Wallerawang Power Station was shut down in 2014 and at that time placement of ash onto the property ceased. Since this time the site has largely been left in an operational state under care and maintenance.

1.2 Full Version

This is the web-based version of the PIRMP that has been prepared in accordance with EPA requirements. The full version of the PIRMP is held at Generator Property Management (GPM) Head Office Building (HOB). The full version is readily available to the persons responsible for implementing the plan, and to any authorised officer of the NSW Environment Protection Authority (EPA) who may request it.

1.3 Objectives

This PIRMP sets out the requirements for the notification, response and management of pollution incidents as defined in the [Protection of the Environment Operations Act 1997](#) (POEO Act) and the [Protection of the Environment Operations \(General\) Regulation \(2022\)](#) (POEO Regulation) for the Kerosene Vale Ash Repositories, including external plant and perimeter lands, GPM Lidsdale personnel and/or contractors to the Lidsdale site.

1.4 Scope

This PIRMP:

- Applies to all GPM Lidsdale personnel, visitors and contractors working on the site.
- Sets out the responsibilities and specific requirements in relation to notifying, responding to and managing pollution incidents as defined in the POEO Act.
- Assigns responsibilities and actions to GPM Lidsdale personnel.

A pollution incident must be notified to the NSW Environment Protection Authority and other regulatory agencies as detailed in the POEO Act where there is a risk of actual or potential 'material harm' to the environment. The definition of material harm from section 147 of the POEO Act is set out in Section 1.7 below.

1.5 Reference Documents

The following reference documents are also available for additional information or detail:

- EPA website - [Incident Management](#)
- Greenspot Wallerawang – [Wallerawang Power Station PIRMP](#).

1.6 Pollution Incident Definition

A **Pollution Incident** means an incident where 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 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.

A pollution incident is required to be notified if '**material harm to the environment is caused or threatened**', which 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.

2. Pollution Incident Response

The following section details responsibilities of designated Lidsdale personnel during a pollution incident. It also details management measures for minimising the risk of harm to site personnel during a pollution incident and the actions to be taken during and immediately after a pollution incident.

2.1 Responsibilities

IN THE EVENT OF A POLLUTION INCIDENT:

The Western Region Manager Site Manager will:

- **Act as Emergency Coordinator and must assess and implement this PIRMP.**
- **Manage the information flow & ensure calls and messages relating to the incident are logged**
- **Ensure an [Incident Summary Log](#) is maintained (refer Appendix A)**
- **Remain Emergency Coordinator until other arrangements are in place.**

The Western Region Manager may appoint a delegate to act as the Emergency Co-ordinator.

Any person on the Kerosene Vale Ash Repository site who discovers an actual (or potential) **pollution incident** should immediately notify the Western Region Manager or the other GPM Senior Staff listed in Table 1, or the most senior person on site. Contact telephone numbers are set out in Table 1 below.

2.2 Contact details

[POEO Reg c72(g)(h)]

Table 1 contains details of the key Lidsdale personnel and details of regulatory authorities and other stakeholders that require notification in the event of a pollution incident.

Table 1 Kerosene Vale Ash Repository PIRMP Incident Contact Details

Contact Name	24-hour Contact Phone Number and Email
Lidsdale Personnel	
Western Region Manager (Paul Glasson) (GPM)	0418 708 113 Paul.Glasson@gpmco.com.au
GPM Managing Director (Stephen Saladine)	0407 919 472 Steve.Saladine@gpmco.com.au
Manager Safety & Environment (John Pola)	0429 205 290 John.Pola@gpmco.com.au
GPM Community Information & Complaints Line	1800 817 711
Relevant Authorities	
NSW Fire and Rescue	000 (if an immediate threat to human health or property)
Lithgow City Council	(02) 6354 9999
EPA Pollution Incident Hotline	131 555
NSW Health – Nepean Blue Mountains Health District	(02) 4734 2022
SafeWork NSW	131 050
NSW Fire and Rescue	1300 729 579 (incident notification only)

2.3 Management Measures to Minimise Harm to Site Personnel

[POEO Regulation c72 (j)]

The safety of personnel involved in pollution incident response is a priority. Only properly trained personnel equipped with appropriate safety gear and protective clothing may take part in incident response where the risk of injury is evident. Any response action is to consider the requirements for support systems such as back-up personnel and equipment, first aid, hoses, mobile plant, etc.

The Kerosene Vale Ash Repositories site is attended Monday to Friday by GPM permanent staff during daytime hours and is patrolled by contract security services at all other times. The site services contractor maintains a 7-day presence during daytime hours.

All persons required to work on the site will be inducted prior to first attending the site and advised of the safety and notification procedures in the event of pollution incident, this can be done via the site sign in system via mobile devices.

2.4 Actions to be taken during and immediately after a pollution incident

[POEO Regulation c72(l)]

2.4.1 First Strike Action

First strike action should target isolation and containment of the spill. The person discovering the incident should attempt first strike action, but only if it is safe to do so. Then the Western Region Manager should be notified. For minor spills, clean-up procedures will be implemented as required.

The Western Region Manager should determine the appropriate further actions to ensure isolation and containment of the spill to prevent further leakage or spread to the surrounding environment.

2.4.2 Incident Response Procedures

Lidsdale has a number of incident response procedures which detail the actions to be taken by site personnel after a pollution incident to reduce or control any pollution. The incident response procedures are to be followed where there is NO threat to the safety of site personnel responding to the incident.

Incident Response Procedures are available for the following situations:

1. Hazardous Substance Guidance
2. Oil / Fuel Spill Response
 - 2.1. Response Plan Components
 - 2.2. Procedure 1: Spills on Land
 - 2.3. Procedure 2: Spills to Cooling Water Canals
3. Response for Other Hazards
 - 3.1. Flooding
 - 3.2. Sedimentation and Erosion
 - 3.3. Fugitive Dust
 - 3.4. Bushfires
 - 3.5. Subsidence and Landslip
 - 3.6. Unexpected Finds

The Incident Response Procedures are kept in the Lidsdale Emergency Response Manual which is held at the Lidsdale Western Region Office (The Cottage).

2.4.3 Pollution Incident Clean-up

Procedures for the clean-up of pollution incidents will largely depend on the type and extent of the pollution incident.

Clean-up procedures will consider the following:

- Type of pollutant;
- Extent/Area of pollution;
- Medium in which pollution has occurred (land, air, water);
- Requirements for specialist advice in relation to the removal and remediation of the pollution;
- Potential additional environmental impacts by the proposed clean-up processes; and
- Costs to remove the polluted material to a waste facility licensed to accept the waste.

The Western Region Manager will be responsible for determining the method of clean-up, in consultation the EPA and/or NSW Fire & Rescue; and other experts where required.

Funding of clean-up procedures will be determined by the Western Region Manager.

Figure 1: Kerosene Vale Ash Repositories PIRMP Notification Protocol



3. Pollution Incident Communications and Training

The following section provides the notification requirements for Lidsdale personnel during a pollution incident. The section also details how neighbours and in what circumstances neighbours will be advised of an incident.

3.1 Immediate Notifications of Incident to Relevant Authorities

The PIRMP Notification Protocol is summarised in [Figure 1](#). The Western Region Manager is required to immediately notify the relevant authorities (refer to [Table 1](#) for contact details) where a pollution incident has occurred **that is causing or threatening material harm to the environment** (i.e. it is not trivial). Section 147 of the POEO Act comprehensively defines when notification is required.

Note: 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

Any person on the Kerosene Vale Ash Repositories site who discovers an actual (or potential) pollution incident should make every practical effort to notify the Western Area Manager or the other GPM Senior Staff listed in Table 1, or failing that, the most senior person on site. They should provide information as requested. Contact telephone numbers are set out in Table 1 above.

An [Incident Summary Log](#) in Appendix A of the PIRMP (or a similar incident log) should be used to document the notification of relevant authorities.

The information required to be provided as part of the notification process includes:

- a) the time, date, nature, duration and location of the incident;
- b) the location of the place where pollution is occurring or is likely to occur;
- c) the nature, the estimated quantity or volume and the concentration of any pollutants, if known;
- d) the circumstances in which the incident occurred (including the cause of the incident, if known);
- e) the action taken or proposed to deal with the incident and any resulting pollution or threatened pollution, if known; and
- f) other information prescribed by the POEO Regulation.

Lack of information should not prevent the Western Region Manager from making an immediate notification in the case where the incident has been deemed to be causing or threatening material harm to the environment. As additional information becomes available, it should be communicated with all the relevant agencies immediately.

The Incident Summary Log should be updated as required and used to document any information updates made to the relevant agencies.

3.2 Communicating with Neighbours and the Local Community

[POEO Reg c72(i)]

The principle in identifying neighbours is based around members of the community or businesses that:

- Adjoin the EPL boundary;
- Have a direct line of sight to the KVAR or its infrastructure; and
- Sensitive receivers, such as schools, nursing homes etc.

There are 130 residences, businesses, or sensitive receivers within 1km of the main body of the EPL boundary.

There are 25 residences or businesses that abut the EPL boundary. Another 44 lie within 250 metres of the main body of the EPL boundary. No residences, businesses or sensitive receivers have direct line of sight. The only sensitive receivers are two heritage listed buildings (not owned by GPM), which will not be impacted by any of the potential incidents that may occur at the Kerosene Vale Ash Repositories.

In the event of a material incident, subject to advice from the regulatory authorities, the following methods of communication can be used to communicate with the local community.

3.2.1 Recorded Voice Announcement (mandatory)

A recorded voice announcement will be placed on the GPM Community Information & Complaints Line and local residents will be notified. This enables local residents to receive information on the nature of the incident and any arrangements following an incident.

3.2.2 Optional Communication Modes

The following optional communication modes may be implemented: Updating the GPM web page; newsletter drop; and advertisements.

3.3 Information to be provided to the Community

Decisions to notify neighbours and the local community will be made in consultation with regulatory authorities based on an initial risk assessment (for example, considering the type of pollutant, concentration of emission, prevailing wind and height of the emission), and ongoing risk assessments if the situation escalates.

Advice provided to the community will depend on the type and extent of the pollution incident and guidance from the regulatory authorities. The following examples are provided as a guide:

- For a significant material incident, such as a structural risk or extreme flood event at the Sawyers Swamp Creek Ash Dam, neighbouring residences deemed at risk will be doorknocked. In addition the Emergency Services database will be used to contact the at risk residents and the wider community.
- Uncontrolled emission of air pollutant: – Community advised by telephone, door knocking and applicable media outlets to close windows and doors turn off air conditioning equipment and stay indoors.
- Uncontrolled release of contaminant into a waterway: – Advise local community to avoid fishing in affected waterways, to restrain pets from entering affected waterways or utilising the waterway for recreation (e.g. swimming, skiing) until the waterway is deemed safe to use following sampling and monitoring.

The Western Region Manager will be responsible for co-ordinating the notification and update of information to neighbours, the local community, regulatory authorities and media.

Kerosene Vale Ash Repositories

INCIDENT SUMMARY LOG

DATE:	TIME OF CALL:
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SITE/AREA OF INCIDENT: POWER STATION / KVAR /SSCAD / BUFFER ZONE / SAWYERS SWAMP CREEK
EXACT PLANT LOCATION OF INCIDENT:
TYPE & DURATION OF INCIDENT:
ESTIMATED NUMBER OF CASUALTIES:
ARE CASUALTIES TRAPPED OR FREE: TRAPPED / FREE
DETAILS OF ANY INJURIES:
WEATHER CONDITIONS AT TIME OF INCIDENT: TEMP: WIND SPEED: (calm / light / moderate / gusting) WIND DIR'N: RAIN: (wet/dry)
IS INCIDENT CAUSING OR THREATENING ENVIRONMENTAL HARM: YES / NO / UNCERTAIN
TYPE OF ENVIRONMENTAL HARM: (air pollution, water pollution, exposure to hazardous chemicals)
TYPE, VOLUME AND CONCENTRATION OF ANY POLLUTANTS DISCHARGED:
CALLERS NAME / POSITION:
CALLERS TELEPHONE NO.:
DETAILS OF ANY WITNESSES TO THE INCIDENT: (name / address / position)
DETAILS OF NOTIFICATION OF KEY GPM PERSONNEL: (name / position / time contacted)
DETAILS OF NOTIFICATION OF RELEVANT AUTHORITIES: (name / position / time contacted)