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8. Emergency & Security Management

8.1.11 Pollution Incident Response Management Plan v12.0

Date 16/04/2025

SAFETY HEALTH ENVIRONMENT & QUALITY

Contents

1. Purpose

This Pollution Incident Response Management Plan (PIRMP) complies with the requirements under section 153A of the Protection of the Environment Operations Act 1997 (POEO Act) and as a holder of an Environment Protection Licence (EPL).

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about the pollution incident to:
  - Transdev Sydney Ferries (TDSF) staff and contractors
  - Environmental Protection Authority (EPA)
  - Safework NSW
  - Fire and Rescue NSW
  - Inner West Council
  - Neighbours outside the facility that may be affected by the impacts of a pollution incident.
- Minimize and control the risk of pollution incident at the facility by risk identification, planned actions implementation and closed out in a timely manner.
- Ensure the plan is implemented by trained personnel with responsibility for implementing the plan and regular testing for accuracy, currency, and suitability.

2. Scope

The aim of the PIRMP is to provide an easily interpreted reference document that ensues pollution incidents can be managed and responded to in an appropriate manner. The PIRMP is applicable to all facets of TDSF operations and describes how incidents relating to pollution will be managed.

3. Definitions

Officer in Charge. Means the Duty Manager or GM Assets or Technical Superintendent at Balmain Shipyard who are responsible to respond and manage any emergency on a Vessel, wharf, and Balmain Shipyard respectively.

Emergency Management Team (EMT). Means a working team consisting of key personnel who are responsible for the development of procedures and guidelines for staff who are operating under the Balmain Emergency Response Plan (BERP).

Emergency Operations Centre (EOC). Means a facility established at the incident source from which the Officer in Charge exercises control in relation to all incidents. This is the point where coordinating agency heads assemble to receive and disseminate information and make operational decisions on the immediate rescue operation.

Emergency Management Centre. Means a facility established in TDSF head office from which the EMT exercises control in relation to major, significant and/or reportable incidents.

Hazardous Materials. Means materials which, without adequate safeguards, may contaminate the environment to immediate or subsequent detriment of that environment or human society and which includes all dangerous goods.

Incident. Means the actual or imminent occurrence of an event which:

- Endangers or threatens to endanger the safety or health of TDSF staff, passengers, or members of the public; or

- Destroys or damages, or threatens to destroy or damage, any TDSF property.
- Being an event, which requires immediate action and a coordinated response. Incidents may either be a crisis or a disaster; or
- Being an event, which causes or threatens to cause pollution or harm to the environment.

Response. Means the process of combating an emergency and of providing immediate relief for persons and assets affected by the emergency.

Small Spills and Leaks. Spills less than 1 Litre and manageable using spill container content.

Large spills. Spills more than 1 litre and required additional controls to clean it.

4. Emergency Response Organisational Structure

The role of the EMT is to provide an emergency operations structure so that the organisation can effectively respond to incidents which may occur at TDSF. The EMT addresses the need for incident command onsite, internal, and external communications with stakeholders and coordination of resources. The structure of the EOT is as follows:

Role	Position	Alternative holder(s)	Activation responsibility/action
Officer in Charge	GM Assets	Fleet Maintenance Manager	Authority to Activate the Emergency Response plan on all incidents. Responds on-site for all incidents. Assumes control on-site for all incidents. Activate the Emergency Management plan on all major incidents and significant incidents with a potential to be major incidents.
Area Warden	Supervisors	Technical Superintendents	Authority to Activate the Emergency Response plan on all incidents. Responds on site to all major and significant incidents. Assumes on-site control until the arrival of the officer in Charge. Assumes on-site control of all routine incidents. Advises Marine Engineering Manager on all incidents.
Wardens	Shipyard Supervisors	Senior SRT's and / or SRA's	Assist with the implementation of the emergency response plan. Responds to all incidents as directed when on-site. Assumes on-site control of routine incidents. Advises Production Supervisors on all incidents.
EOT Recorder	Administration Assistant – Shipyard	Stores Co-ordinator Supervisor	Co-ordinates the set up and establishment of the EOC. Maintain a current activity log.

During emergency, wardens shall be identified using coloured safety helmets as follows:

- Area Warden – yellow helmet
- Wardens – red helmet

5. Pre-Emptive Actions

5.1 Preparedness and inspections

The key to effective prevention of pollution incidents is regular inspections, continuous review of procedures and risk assessments. Mitigation strategies include:

- Provision of spill and containment kits at regular intervals and regular inspections.
- Activity specific and daily risk assessments.
- Review and development of work procedures and safe work method statements in consultation with relevant work teams, SHEQ team members and senior management.
- Daily inspections of active work areas.
- Completion of routine environmental checklists.
- Internal and external audits on Environmental compliance.
- Community notification of major and construction updates.

5.2 Training and drills

To ensure the workforce is ready to respond to pollution incidents, regular drills and specific training is undertaken. The training is to ensure that when required, an emergency management response can be established to and effectively respond as required.

The BERP is to be tested and emergency drills conducted as follows:

- An annual drill is to be held to test the response capability of the Balmain Shipyard to a major incident. This drill is to encompass yard evacuation, testing of alarms and deployment of spill booms (smaller local spills and larger containment boom). Deployment of the spill boom to test the serviceability and the crew competency is undertaken.

- Toolbox talks on spill kit use and incident response to convey critical information and raise awareness.

- Response drills will be done monthly and will include at least one of the following:
  - Unlawful Act;
  - Bomb Threat – Telephone/ Written;
  - Discovery of Unattended Property;
  - Environmental Incident – Spills;
  - Fire / Explosion;
  - General Evacuation;
  - Person(s) in Water;
  - Person(s) Injured;
  - Unlawful Seizure / Robbery; and
  - Vessel Alongside Emergency.

5.3 Evacuation

Detailed information on the evacuation procedures to be followed in the event of an incident / emergency are contained within SHEQP8.1.12 Balmain Shipyard Emergency Response Plan.

6. Inventory and Safety Equipment

6.1 Inventory

TDSF operate Balmain Shipyard stores, handles, and uses a large number of chemicals in maintenance and operations and has a comprehensive system for safe handling of such chemicals. This system includes, but is not limited to:

- Hazardous Chemicals Register and Manifest.
- Safety Data Sheets (SDS).
- Procedures for the approval of new chemicals on site.
- Procedures for safe storage and use of these chemicals.

The Shipyard is audited periodically via internal and external stakeholders. To meet the requirements of the Act, continuous monitoring of the Hazardous Chemicals Register and Manifest occurs, and amendments made when required.

6.2 Safety Equipment

The GM Assets shall ensure all required emergency equipment is available at and is appropriately located and maintained in good working order. An equipped first aid room that can be utilized in an emergency is in the main office block. Each workshop location has a first aid kit and is to be kept full stocked and always maintained.

The GM Assets is responsible for ensuring availability of an adequate stock of consumable equipment and ensure all emergency equipment is being inspected, tested, and maintained as necessary.

6.2.1 Emergency Control Equipment

The yard spill containment boom is the primary containment control for major spills to the harbour. The yard spill boom is to be deployed in the event local spill kit booms snakes / sausages are not adequate to contain a spill. Deployment of the spill boom is to occur at least twice a year and when testing the PIRMP. Procedures for deployment of the spill containment boom is contained within Annex A, SHEQP8.1.12 Balmain Shipyard Emergency Response Plan.

Equipment required to manage a first response for a hydrocarbon spill to water will be located at the start of each wharf. This equipment is in addition to the oil and general spill response kits strategically located within the Shipyard workshops and yard area.

Spill response kits are in strategic locations within the Shipyard precinct. These kits are held in wheeled bins and contain materials suitable for small hydrocarbon spills on land as well as providing back up to the first response equipment listed above.

The spill kits are stationed at the following locations, refer to emergency plans in each location:

Location	Spill kit (number, size & type)
Wharf 3	1 x 660 litre - Floating booms 2 x 15m containment booms 2 x 240 litre – Marine spill kits 1 x 240 litre – Floating booms 1 x 240 litre – Hydrocarbon spill kit
Wharf 2	1 x 660 litre - Floating booms 2 x 240 litre – Marine spill kits 1 x 240 litre – Floating booms 1 x 240 litre – Hydrocarbon spill kit
Wharf 1	1 x 660 litre - Floating booms 2 x 240 litre – Marine spill kits
Fuel pod end of Jetty 1	1 x 240 litre – hydrocarbon spill kit
Trade Waste Plant	2 x 240 litre – hydrocarbon spill kit
Paint Store (Depot 3)	1 x 120 litre HAZCHEM spill kit
Store Apron	2 x 240 litre – hydrocarbon spill kit
Fitters / Machining / Refit	1 x 240 litre – hydrocarbon spill kit
Plumbers / Boilermakers / Shipwrights workshop	1 x 240 litre – hydrocarbon spill kit
Battery Store	1 x Wall mounted battery spill kit

7. Contacts and Communication

7.1 Contacts

Any large spill to harbour that is unable to be contained by spill kit contents, Harbour Control Emergency Line Sydney Ports (02 9296 4000) are the primary responders.

Call 000 if the incident presents an immediate threat to human health or property.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the **following order**:

External stakeholders	Phone number
Harbour Control Emergency Line (Sydney Ports)	02 9296 4000
Sydney Harbour Foreshore Authority	02 9296 4444
Fire and Rescue NSW	000
NSW Environment Protection Authority Environment	131 555
Local Public Health Unit – (Balmain Hospital)	02 9395 2111
SafeWork NSW	13 10 50
Inner West Council	02 9392 5000
Road & Maritime Services -RMS (Maritime)	13 12 36
Sydney Water Police	02 9320 7499
Internal stakeholders	**Phone Number**
General Manager Assets (Primary contact)	0428 479 821
General Manager Safety, Health, Environment and Quality (Alternate contact)	0424 665 417
Safety and Systems Specialist (Alternate contact)	0447 340 008
Balmain Shipyard	02 8622 9661
TDSF Control	02 8113 3004
TDSF Head Office	02 8113 5430

7.2 Communication

7.2.1 Communication Systems

The means of communication during an incident will vary, depending upon the location and nature of incident. For the purposes of managing an incident, it is important to have both primary and alternate means of communications with the incident site and EOC. The following details provide an established means of internal communications during an incident.

- Mobile phone devices and fixed landlines are to be used to form part of the communication platform.
- BSY Radios, see section 7.2.1.1
    - Operations channel Primary channel 7D
    - Emergency channel Primary channel 8D

7.2.1.1 Emergency Channel Operation

In the event of any significant or major incident the Balmain Shipyard Safety Office will issue a direction to all Balmain Shipyard Wardens (response personnel) to switch from the operations Channel 7D to the emergency Channel 8D for the duration of the incident. Once staff have switched to the emergency channel, they need to conduct a radio check to ensure all parties have communications.

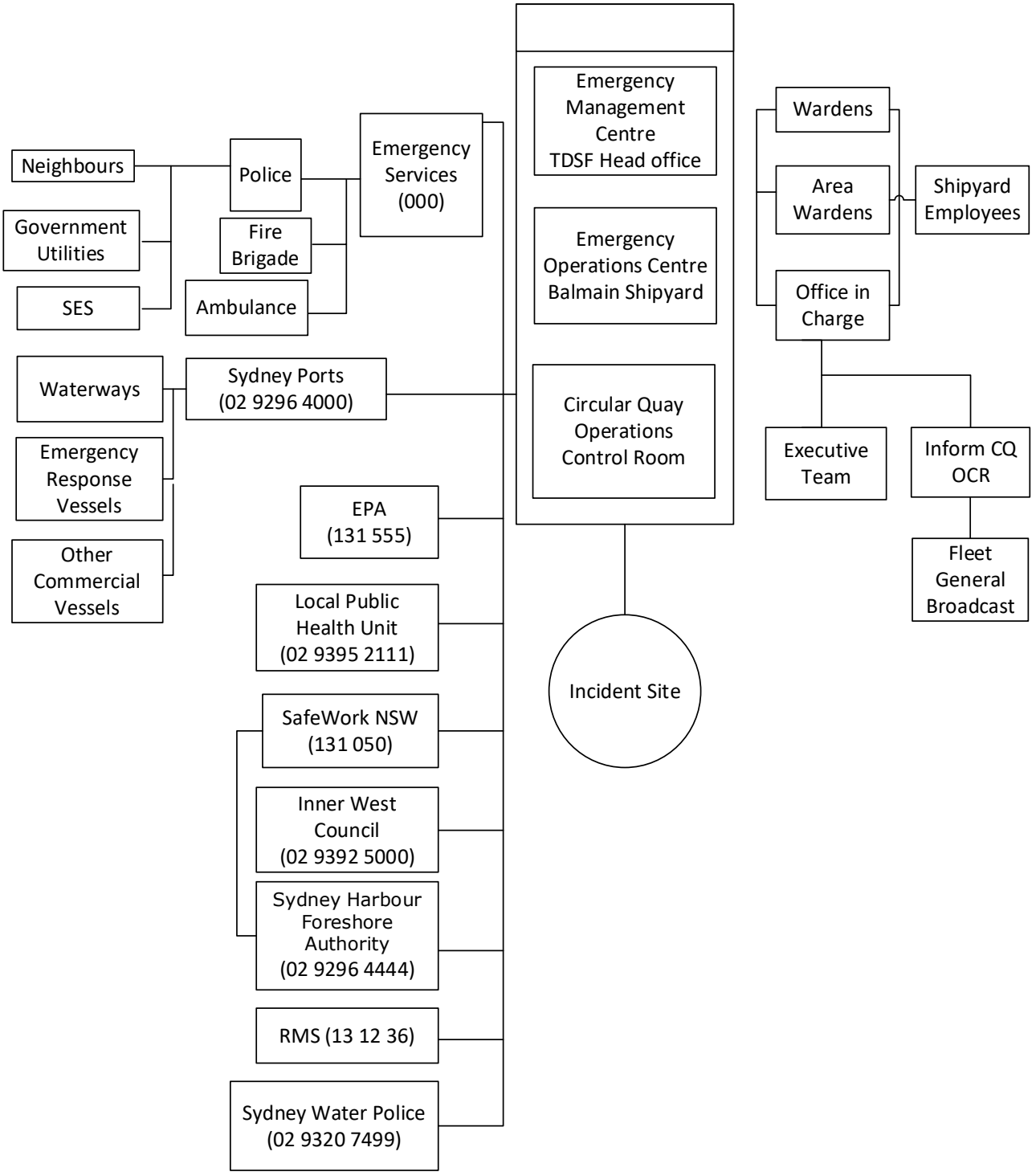
The direction to switch back to the operations Channel 7D will be issued by the Balmain Shipyard Safety Office.

Note: During a bomb threat incident CED (current emitting devices, mobile phones / radios) SHALL NOT be used within minimum 50 meters of the suspected device. Therefore, a runner or telephone landline will have to be utilised to convey information.

7.2.2 Communication Plan

The communications plan, as shown below, will be implemented during every significant and major incident. However, the extent to which external stakeholders will be notified of an incident will be contingent on the incident category, type, and location. It must be remembered that communication is integral to the success of any incident response; therefore, all affected stakeholders must be contacted at the earliest possible opportunity. Assistance may be required in the EOC to ensure all internal/external stakeholders are contacted (e.g., any available staff to undertake phone communications).

Figure.1 BSY Communication plan in case of spill or leak



7.2.3 External Notifications

All incidents that cause actual or potential material harm to the environment shall be reported to the relevant authority. Any worker who is conducting an activity that has led to an incident must, immediately after the person becomes aware of the incident, notify their manager/supervisor/etc of the incident and provide all relevant information about the incident. If the

manager/supervisor/etc cannot be contacted, the person is required to notify each relevant authority.

Notifications to the relevant authorities shall be performed by the GM SHEQ, GM Assets, or delegate. Any request for information that is received by any other staff should be directed to the Officer in Charge. All workers are to cooperate with any direction from the regulatory authority following a pollution incident.

- **Media.** All media inquiries must be directed to the GM Customer Experience and Communications who will coordinate an official statement. No other person is authorised to provide comments to the media.
- **Neighbours.** The Balmain Shipyard is nestled within a residential community. If an incident with an offsite impact occurs or an event that may be of concern to neighbours, the NSW Police Force and/or Fire and Rescue NSW will engage with the local community to provide information on the event. For any work that occurs outside of the normal operational parameters of the shipyard, neighbours are notified via written correspondence posted to their home addresses. All other routine operational work does not attract additional notification.

7.2.4 Noise Complaints

The Balmain Shipyard is subject to an Environmental Protection Licence. All work conducted shall be within the defined parameters. Due to the nature of works, there is noise associated with operations at the Shipyard, however, every effort to mitigate noise shall be taken. Management will take all reasonable and practicable actions to resolve any complaints regarding operations at the Shipyard. **Concerns can be directed to 02 8622 9661.**

7.3 Emergency Operations Reporting

In the event of an incident the collection, recording and dissemination of information is essential so that accurate and up-to-date decisions can be made at all levels.

The incident log is the primary method of recording all information and action taken. For large or small spills or leaks the log is kept in BSY Office by Administrator.

The GM Assets is responsible for ensuring that all incident reports and log sheets are collected following an incident. All reports are to be kept and forwarded to the SHEQ team for commencement of an incident file.

7.4 Map

The Balmain Shipyard Dangerous Goods Plan the highlights storage locations and quantities of hazardous materials and substances. This Plan is to be used as an indicative guide as to the locations and the maximum quantities that can be stored. The actual quantity on-site varies at any given time.

8. Pollution Incident Response Procedures

8.1 Immediate Actions and Notifications

In the event of a pollution incident, follow response and notification procedures detailed below.

Figure 2. BSY response and notification plan in case of spill or leak

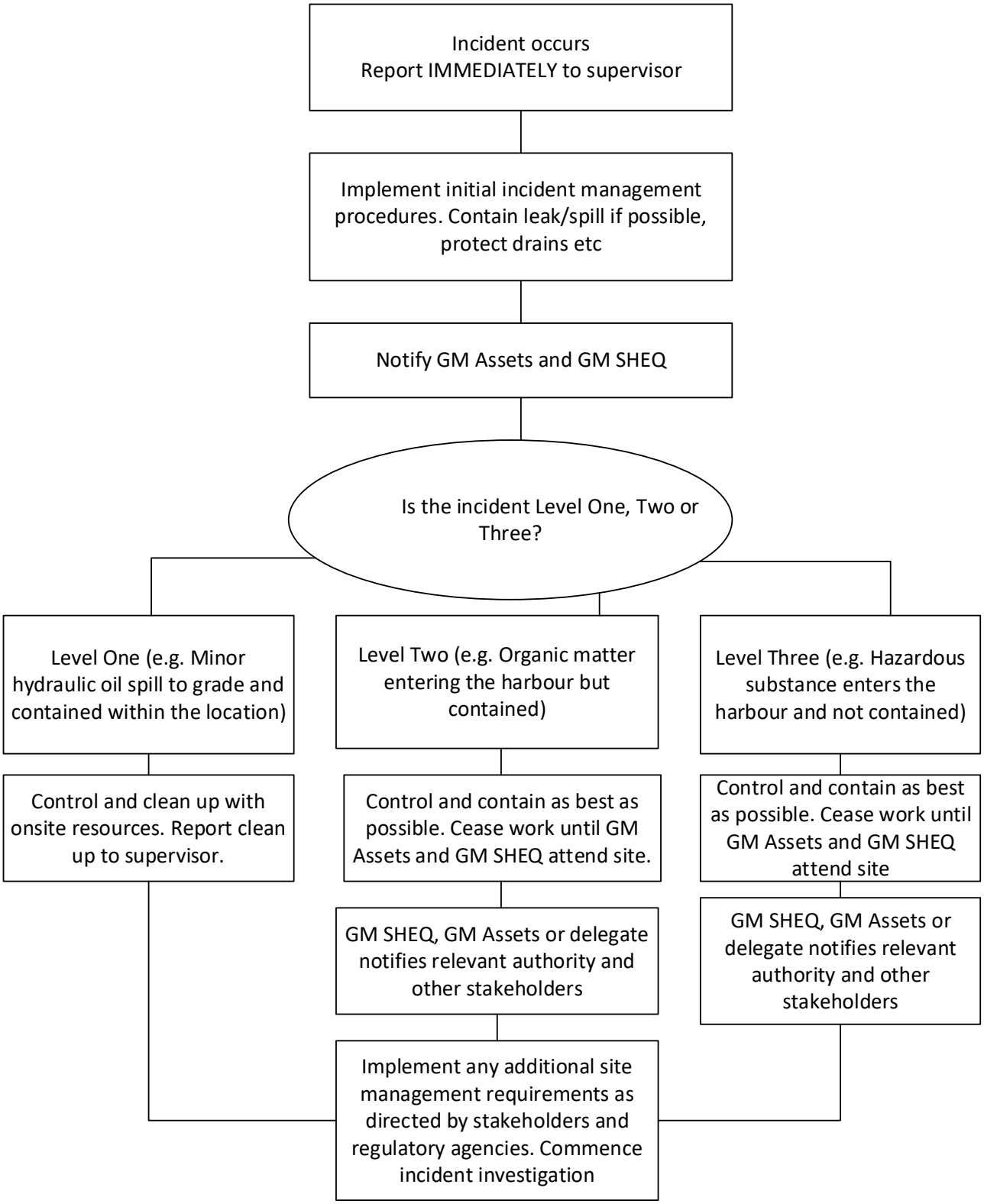


Figure 3. Pollution incident response action & responsibility plan

	Action	Responsibilities	Comments
1	Stop further leaks / spills	Person causing / finding leak	If leak from drum, reposition drum so leak is uppermost. If leak from pipe, close valve etc
2	Inform supervisor	Person causing / finding leak	Stop any traffic through and isolate the area
3	Determine severity of the leak	Supervisor	For major leaks notify GM Assets and GM SHEQ
4	Form barrier / bund around leak / spill	Supervisor / Work Crew	Use spill kit contents. If spill to harbour deploy spill boom
5	Stop the spreading of leak	Supervisor / Work Crew	If possible, transfer contents from compromised storage container to alternate container
6	Put barrier / bund around drains / outlets	Supervisor / Work Crew.	Barricade / bund drains and grates using sandbags / boom socks etc
7	Obtain oil spill kit and apply oil absorbent on spill	Supervisor / Work Crew	Use absorbent material or equivalent
8	Clean-up / remove absorbent material to bin	Supervisor / Work Crew	Use appropriate cleaning solution to remove remaining contaminate
9	Commence incident investigation	Supervisor / Work Crew	Record incident and review procedures

9. Risk Matrix

As per Transdev Australasia guideline procedure (TDA-02.STD.0004 Risk & Opportunities Management Standard)

Likelihood	Likelihood % For risks that are activity based	Likelihood Description	Frequency Frequency is for risks that are time based	Similarity Similarity is for risks that are contract based	LIKELIHOOD		CONSEQUENCE Insignificant	Minor	Moderate	Major	Catastrophic
							first aid treatment; non-core business halted >1 week; damage to assets which can be repaired as BAU; <0.5% NPAT; insignificant spill, no requirement to contain; routine worksite visits; compliance audits	medical treatment with no loss of work capacity; disruption managed by altered operations; multiple core functions affected >1 week; damage to assets which can be repaired within 7 days; 0.5-1% NPAT; low impact spill easily contained; little or no harm to the local environment; non-routine worksite visits; PIN / corrective action notices	serious injury / multiple minor injuries; lost time injury <7 days; disruption to a number of opertional areas / core business functions for >1 day; damage to assets which can be repaired within 1 month; 1-2.5% NPAT; significant impact spill; short term damage to local environment; regulatory direction; mandatory improvement notice; client notification	fatality; multiple serious injuries; lost time injuries >7 days; all opoerations in one business unit and / or core business halted for 1-4 weeks; total destruction of 1 vehicle or partial destruction of 1 building / infrastructure item; 2.5-5% NPAT; major impact spill; medium term damage to local environment; multiple breaches; potential suspension of operating licence; show cause notice	multiple fatalities (employee, customer or third party); multiple serious permanent disability; total shutdown of operations for >4 weeks; total destruction of several vehicles; building or infrastructure item; >5% NPAT; irreparable damage to the eco-system or long term damage to the local environment; loss of operating licence; shutdown of service delivery
							1	2	3	4	5
Almost certain	90-95%	Most likely to occur	Event occurs on a monthly basis	Event occurs in almost all similar contracts	**Almost Certain** - expected to occur in most circumstances - more than 10 times a year	5	**Medium**	**High**	**High**	**Extreme**	**Extreme**
Likely	60-89%	Is expected to occur	Event occurs on a quarterly basis	Event occurs in most similar contracts	**Likely** - will probably occur in most circumstances - between 1-10 times per year	4	**Medium**	**Medium**	**High**	**High**	**Extreme**
Possible	30 - 59%	May occur	Event occurs on an annual basis	Event occurs in half of similar contracts	**Possible** - will probably occur in some circumstances - once every 1-5 years	3	**Low**	**Medium**	**Medium**	**High**	**High**
Unlikely	6 - 29%	Not likely to occur	Event occurs once during the contract	Event occurs in some similar contracts	**Unlikely** - could occur at some time but is not expected - once every 5-20 years	2	**Low**	**Low**	**Medium**	**Medium**	**High**
Rare	0- 5%	Most unlikely to occur	Event unlikely to occur during the contract term	Event does not occur in most similar contracts	**Rare** - may occur only in exceptional circumstances - less than once every 20 years	1	**Low**	**Low**	**Low**	**Medium**	**Medium**

Consequence	Reputation	Financial	Operations	Information Technology	Health & Safety	Legal & Compliance	Environmental	Customer Service
Catastrophic	Substantiated, repeated, adverse national media coverage	Loss of greater than $3M or >20% of annual contract profit	Total shutdown of operations / core business functions for >7 days; total destruction of several vehicles, building / infrastructure asset	Critical system(s) unavailable >12 hours; multiple v. important systems unavailable for >48 hours; deliberate loss or theft of data; malicious security breach	Multiple employee, customer or third party fatalities or serious permanent disability	Loss of operating licence; shutdown of service delivery; criminal investigation (including fraud/bribery)	Irreparable damage to the eco-system or long term damage to the local environment	Potential loss of Operating Contract due to breakdown of client relationship
Major	Substantiated, repeated, adverse state-wide media coverage	Loss of greater than $1M to $3M or 5-20% of annual contract profit	All operations in one business unit compromised and / or core business halted for 2-7 days; total destruction of one vehicle or partial destruction of 1 building / infrastructure asset	Critical systems unavailable 4-12 hours; multiple very important systems unavailable for 24-48 hours; accidental loss of data; repeated successful attacks on data security	Single fatality or possible fatality; permanent disability (major injury); or multiple serious injuries (long term lost time injuries >7 day)	Multiple breaches / non-compliance; potential suspension of operating licence; show cause notice; civil prosecution, privacy breach	Major spill; medium term damage to the local environment	Lost commercial opportunity due to breakdown of client relationship
Moderate	Substantiated adverse local media coverage	Loss of greater than $200k to $1M or 1- 5% of annual contract profit	Disruption to a number of operational areas and / or core business functions for >1 day; damage to assets which can't be recovered / repaired within 7 days	Critical systems unavailable for up to 4 hours; multiple very important systems unavailable for <24 hours; repeated consistent attempted attacks on data security	Serious injury; multiple minor injuries (lost time injury <7 days)	Regulatory direction; mandatory improvement notice or condition of accreditation; client notification	Minor spill; short term damage to the local environment	KPI abatements
Minor	Interest from primary stakeholders	Loss of $25,000-$200,000 or 0.025% - 1% of annual contract profit	Disruption managed by altered operational routine and / or multiple core functions affected >2 days; damage to assets which can't be recovered / repaired within 2 days	Single important system unavailable for >6 hours; single instance of loss of data (other than privacy breach)	Minor injury (medical treatment with no loss of work capacity)	Non-routine worksite visit; provisional improvement / corrective action notice	Spill easily contained; little or no harm to the local environment	Dissatisfied stakeholders
Insignificant	Interest internally from employees	Loss <$25,000 or <0.025% of annual contract profit	Non-core business halted >3 days; damage to assets which can be repaired as part of business as usual within 1 day	Multiple routine systems unavailable for >3 days	First aid treatment; illness	Routine worksite visits; compliance audits	Insignificant spill; no requirement to contain or report	Increased monitoring by client or stakeholders

Risk Rating	Action
Extreme	Escalated to the TDA Board; Action plan reviewed and approved by the Executive Leadership Team of TDA
High	Managed by the Senior Leadership Team of Operating Subsidiary Oversight by the Operating Subsidiary Board
Medium	Managed by the relevant Managing Director
	Oversight by the Senior Management Team of the Operating Subsidiary
Low	Managed at a local level (i.e. Depot / Area Manager)
	Oversight by the relevant Managing Director and Senior Management Team of the Operating Subsidiary
Insignificant	Managed at workshop / operational level with local management oversight

10. References:

- SHEQP8.1.12 Balmain Shipyard Emergency Response Plan
- TDSF Hazardous Chemicals Register
- 9.1.1.1 Safety Report Form V2.0
- TDA-02.STD.0004 Risk & Opportunities Management Standard V5.0

11. Document History

Version	Revision	Revision Date	Description	Prepared By	Reviewed by	Approved by
1.0	All	02/05/2014	Consolidated into new SHEQ Manual.			Wayne Potter
2.0	All	01/06/2015	Complete re-write to align with requirements set out in EPA Guidelines for preparation of Pollution Incident Response Management Plans.			Wayne Potter
3.0	All	05/01/2016	Complete review following test of PIRMP and review of spill response equipment			Wayne Potter
4.0	5.2.3 and Flow charts	12/02/2016	Reviewed external notification requirements to better align with the Act and changed flow chart formatting to make more legible			Wayne Potter
5.0	All	30/03/2017	Review during PIRMP test drill			GM SHEQ
6.0	All	07/08/2017	Policy reformatted in line with Branding			GM SHEQ
7.0	All	08/02/2018	Formatting			Madeleine Di Vito
8.0	All	20/05/2019	Document Review Addition of a new Appendix A.			GM – S&A
9.0	All	27/01/2020	Document Review post PIRMP test drill	Louise Mabiala		GM – S&A

9.1	All	05/02/2020	Public Version – Removal Appendix A			GM – S&A
9.2	All	16/04/2020	Update Balmain Complaints Tel No.			GM – S&A
10.0	All	29/10/2021	Review of document. Update of formatting and template.	S&A Advisor		GM SHEQ
11.0	All	27/05/2022	Review of document. Update of contacts and communication table, and Risk Matrix aligning it with TDA guidelines.	S&A Advisor		GM SHEQ
12.0	All	16/04/2025	Update Internal Stakeholder Phone Numbers.	Sharon Fairbanks	Travis Winter	GM SHEQ