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# Narellan Field Service Centre (EPL 13025)

## Pollution Incident Response Management Plan

Prepared by Endeavour Energy Sustainability and  
Environment  
Version 13



Version Control

Version	Date
2	30 September 2013
3	9 October 2014
4	30 September 2015
5	30 September 2016
6	4 October 2017
7	31 January 2018
8	8 October 2019
9	27 October 2021
10	21 September 2022
11	03 February 2022
12	30 January 2024



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## 1. Introduction

### 1.1 Background

An environment protection licence (EPL) (licence number 13025) was established by Endeavour Energy in 2009 for the Narellan Field Service Centre (FSC). The licence is regulated by the NSW Environment Protection Authority (EPA) and is required under the *Protection of the Environment Operations Act 1997* due to the volume of waste oil that can potentially be stored at the Narellan FSC.

In 2012, the *Protection of the Environment Operations Act 1997* was amended and the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012* was gazetted. One of the outcomes of this amendment was a requirement for all holders of an environment protection licence to prepare and implement a pollution incident response management plan.

The pollution incident response management plan must:

- be kept at all times at the premises;
- include information as required in the amendment;
- be tested on an annual basis; and
- be implemented if a pollution incident does occur.

Endeavour Energy has prepared a Risk Assessment for Emergencies at Narellan FSC. This pollution incident response management plan supports the Risk Assessment by providing additional guidance on the response and reporting of pollution events.

### 1.2 Objectives

The objectives of the pollution incident response management plan are to:

- provide guidance on responding to a pollution incident, such that potential harm to the environment and humans is minimised; and
- ensure timely and correct reporting of a pollution incident.

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## **2. Site Information**

### **2.1 Site Address and Description**

The Narellan FSC is located at 17 and 19a McPherson Road, Smeaton Grange, NSW, 2567.

The site is currently an operational FSC for Endeavour Energy with typical activities including truck and equipment storage, office tasks, mechanic workshops, and oil storage and handling.

### **2.2 Surrounding Land Uses**

The Narellan FSC is located within the Smeaton Grange Industrial Park. The land uses surrounding the site are industrial and commercial in nature. There is a Caltex Service Station located approximately 200 metres to the south east of the site.

### **2.3 Surrounding Sensitive Environments**

Narellan Creek is located directly west of the site, while Annan Creek (tributary of Narellan Creek) is located approximately 60 metres to the north. Stormwater drainage outlets leaving the site are connected to Annan Creek. Annan Creek joins into Narellan Creek 180 metres north of the site, which flows further north west through Harrington Park then eventually flows south-west into the Nepean River. The junction of Narellan Creek and Nepean River is 5.3 kilometres south-west of the site.

The nearest residential property to the site is located 160 metres to the south.

The nearest school is the Madgalene Catholic High School, located 250 metres west of the site.

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Source: SIX Maps (<https://maps.six.nsw.gov.au/#> viewed 08/02/23)

**Figure 2.1- Narellan FSC and location of Narellan Creek and Annan Creek**

## 2.4 Environmental Hazards and Pollutant Inventory

### 2.4.1 Environmental Hazards

The primary environmental hazard at Narellan FSC is associated with the storage of oil and the potential for containment failures and consequent loss of oil to the surrounding environment. It is noted that all oil containment facilities were constructed in 2009 in accordance with Australian Standard 1940:2004 (The Storage and Handling of Flammable and Combustible Liquids) and Endeavour Energy's internal design standards. As such, the likelihood of containment failure is considered to be, as low as reasonably practicable.

Factors which may increase the likelihood of a containment failure are the use of unqualified contractors and equipment deterioration (e.g. bund integrity). However, these factors are controlled by:

- Only contractors licensed by the EPA undertake the unloading of waste oil from the 20 kL waste oil tanks; and
- the depot bunds are inspected for integrity issues (e.g. cracks) every six months.

### 2.4.2 Pollutant Inventory

The Narellan FSC includes the following oil storage and handling facilities:

- 2 x 20,000 L above ground tanks (in bunded areas) used for storing waste transformer oil;
- bunded areas for storage of 205 L and 1,000 L oil drums; and
- bunded areas for storage of transmission and distribution transformers.

A list of the pollutants and maximum quantities that may be stored at the Narellan FSC, and the approximate locations of each pollutant is detailed in **Table 2.1** below.

**Table 2.1- Inventory of pollutants**

Pollutant	Maximum Quantity <sup>1</sup>	Location
Transformer (insulating) oil	80,000 L <sup>2</sup>	The above ground storage tanks are located in a covered bunded area in the south west corner of the site. Transformer oil is also contained in transformers which are periodically stored at the site in the uncovered bunded areas in the western portion of the site and the south east corner of the site.

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Pollutant	Maximum Quantity <sup>1</sup>	Location
Hydraulic oil, transmission fluid, engine oil, anti freeze, gearbox and diff oil	2,000 L <sup>3</sup>	These are stored in drums on either bunded pallets in the mechanic workshop, or in the bunded vehicle wash bay located adjacent to the mechanic workshop.
Gas cylinders (LPG, oxyacetylene, SF <sub>6</sub> )	15 bottles	Adjacent to the truck garage (see Figure 1)
Asbestos (waste)	1 x 1,100 L bin	Bin storage area located in the western portion of the site.
Mercury (in waste fluoro light globe bins)	240 L wheelie bins	Bin storage area located in the western portion of the site.
Lead acid (in waste batteries)	1 x pallet load	Stored on covered bunded pallet in the bunded vehicle washbay.
Silica gel beads (waste)	1 x 200 L drum	Stored in lined 200L drum near store.

Notes:

- 1- Quantities indicated in Table 2.1 above are maximums only, and actual volumes will vary.
- 2- The quantity of transformer oil being stored at the site can vary greatly based on the number of transformers stored in the bunded area in the south west corner of the site. The maximum capacity was reduced to 40,000 litres in 2016.
- 3- The quantity of each type of oil being stored in the mechanic workshop will vary depending on stock at any one time.

In addition, **Figure A** details the approximate location of the pollutants potentially present.

### 2.5 Off-site hazards

Given the licensed facility is located in an industrial area; it is possible that neighbouring sites handle dangerous goods or explosive materials. However, it is considered unlikely that a potential pollution incident at the Narellan FSC would impact these facilities or set off a pollution incident from these facilities. In the event of a fire or explosion, notification of neighbouring properties is to be considered as detailed in Section 3.5 of this PIRMP.



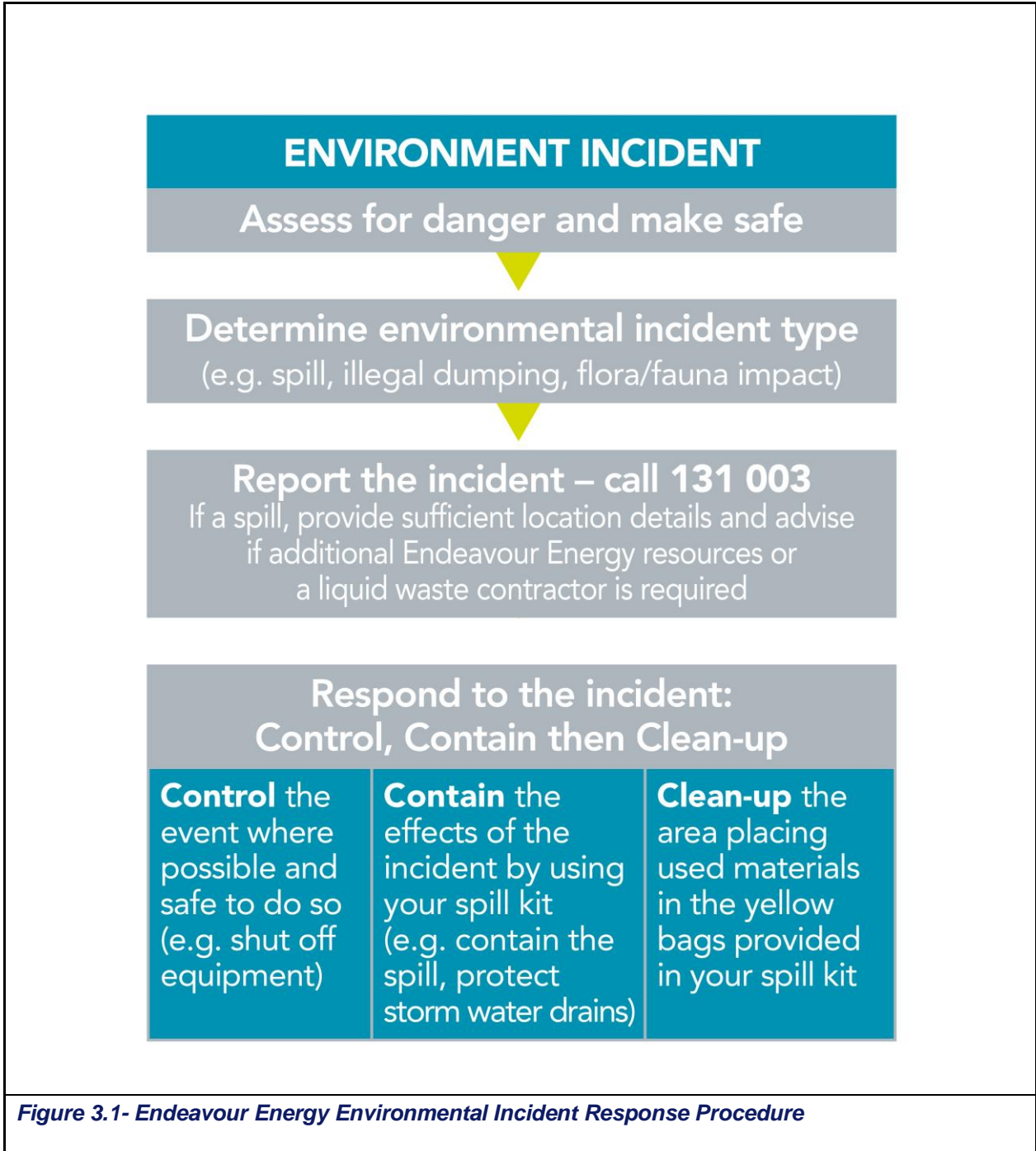


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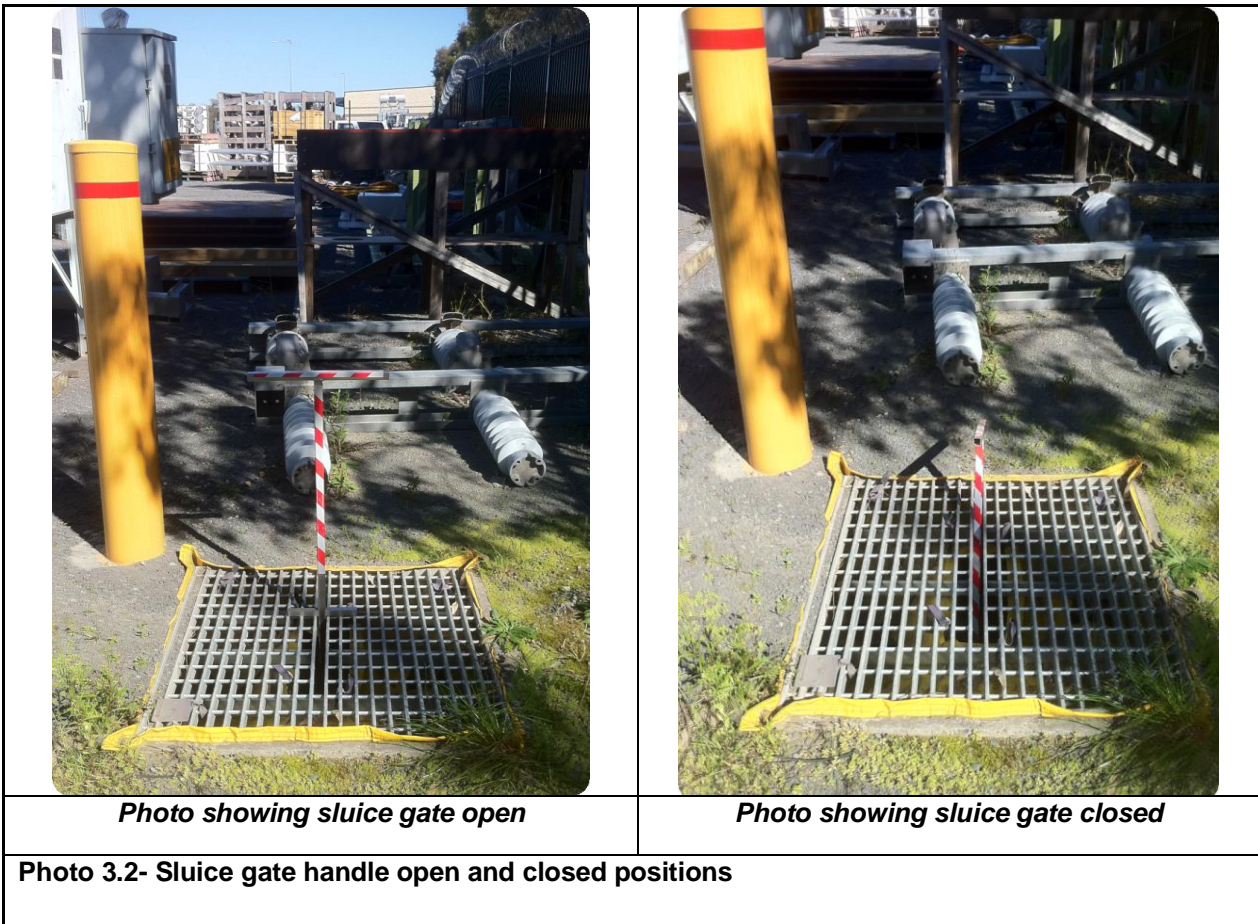
*Photo 3.1- Photo showing onsite spill kits*

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### 3.3.2 Sluice Gate

The loss of pollutants to stormwater may be prevented by the timely closure of the stormwater sluice gate. This gate is located in the discharge pipe at the northern corner of the Narellan FSC (near the site exit) as shown on **Figure C**. Timely closure of the sluice drain will prevent the spill from migrating off-site. **Photo 3.2** below shows the sluice gate handle in the open and closed positions.



### 3.3.3 Recovery of spill

Following containment of the spill, a licensed liquid waste contractor should be engaged to recover the spill. Endeavour Energy has established a contract with a licensed liquid waste disposal contractor for emergency work. The licensed liquid waste disposal contractor can be mobilised by the Call Centre (13 10 03).



### 3.5 Community Communication

#### 3.5.1 Endeavour Energy Communications with the Community

A pollution event from the Narellan FSC may affect the neighbouring community in the following ways:

- pollution of stormwater system/creek; and/or
- smoke hazard from a fire.

Community populations that may potentially be impacted by a pollution event from the Narellan FSC include:

- adjacent industrial and commercial facilities;
- premises adjacent to the stormwater system/creeks;
- the nearest residents to the site (approximately 160 m south and 240 m east of the site); and/or
- the nearest school (Magdalene Catholic High School, located 250 m west of the site)

In the event of a pollution incident that has the potential to affect surrounding neighbours, the Endeavour Energy Corporate Communications branch should be consulted for advice on community communication. In the event of a pollution incident impacting the stormwater system, premises adjacent to the system must be notified. The relevant premises adjacent to Annan Creek are listed in Table 3.6 and shown in Figure D. These communications will be undertaken by the Environmental Services Manager, the Manager Corporate Communications and/or the Manager Sustainability and Environment.

**Table 3.6- Contact details for Premises Adjacent to the Stormwater System**

Company (and Figure D reference ID)	Contact Phone Numbers
Safety and Industrial Supplies (1)	4648 2622
Signs Lines'N Scrolls (2)	4647 6722
Narellan Truck Wash (3)	4647 6066
U-Wreck (4)	4628 1000
Multispares Truck Parts (5)	4628 1000
WOMA Australia (6)	4648 2311



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### 3.6 Testing of Pollution Incident Response Management Plan

In accordance with the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*, this Pollution Incident Response Management Plan must be tested annually.

Sustainability and Environment will manage the testing of this Plan. Testing may involve a “mock” spill event at the Narellan FSC or a desktop “mock” exercise. A record will be maintained of test events in accordance with **Appendix A**.

In the unlikely event of a pollution incident, this plan must be tested within one month of the incident occurring.

### 3.7 Staff Training

A tool box talk will be completed with relevant staff located at Narellan FSC annually as part of the testing of the management plan. The toolbox talk will include instruction on the location and use of spill kit materials in accordance with the incident response flow chart, and instruction on the sluice gate. A record of toolbox talks will be maintained in accordance with **Appendix A**.

In addition, an internal factsheet summarising the requirements of this Plan will be laminated and provided to Endeavour Energy vehicles that are involved in the oil handling process.



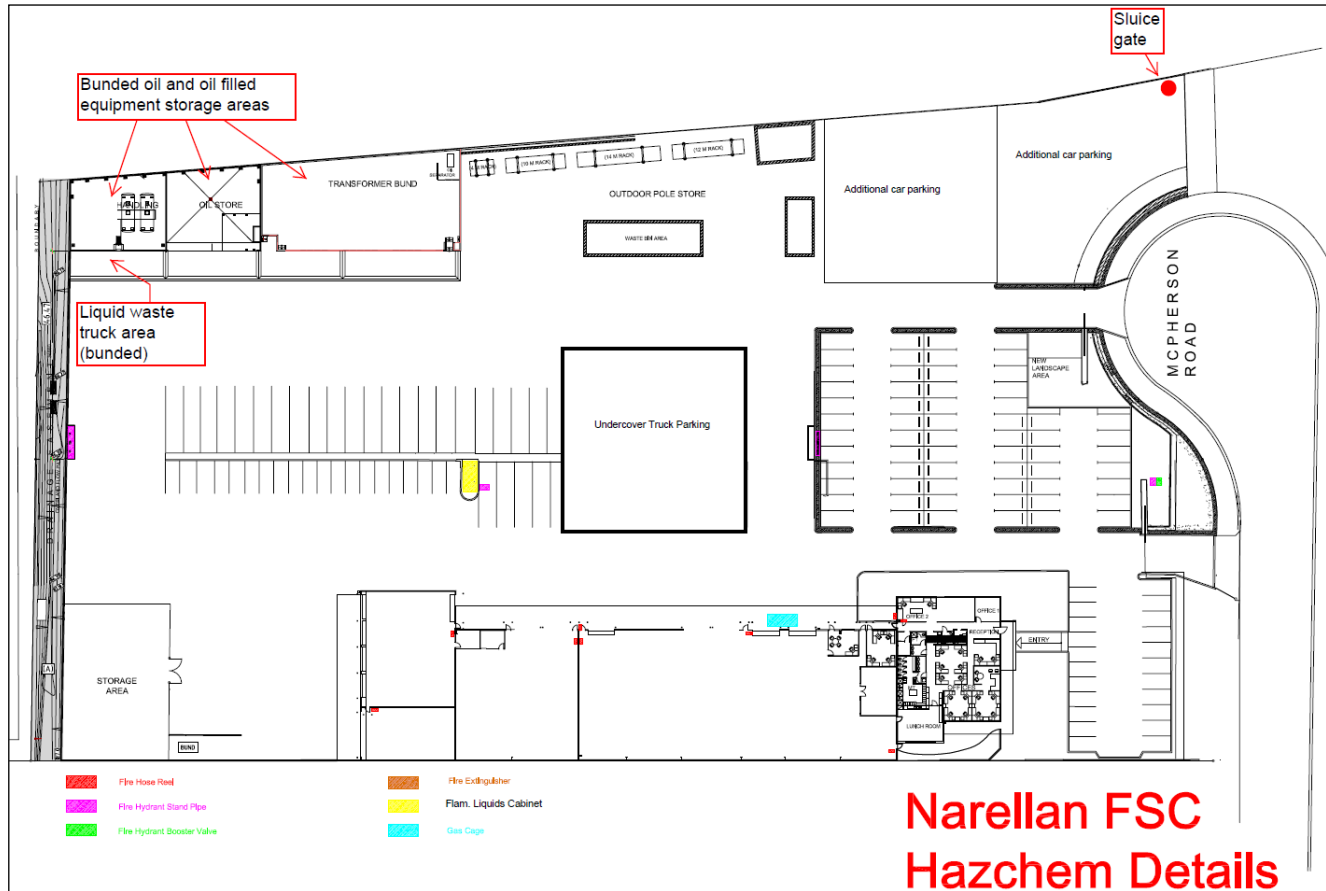


# Figures

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## Figures

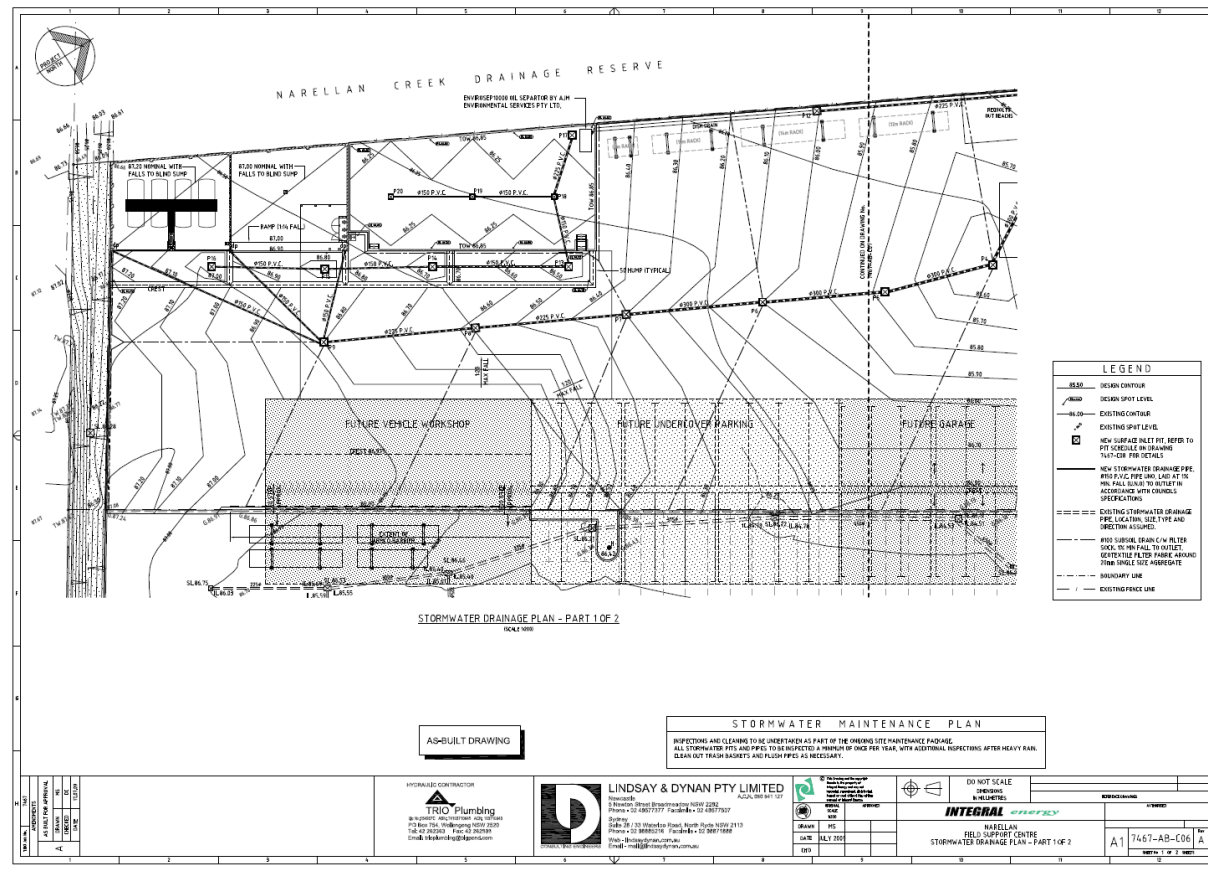
Figure A- Hazchem Details



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Figures

Figure B- Stormwater Drainage Plan (1 of 2)



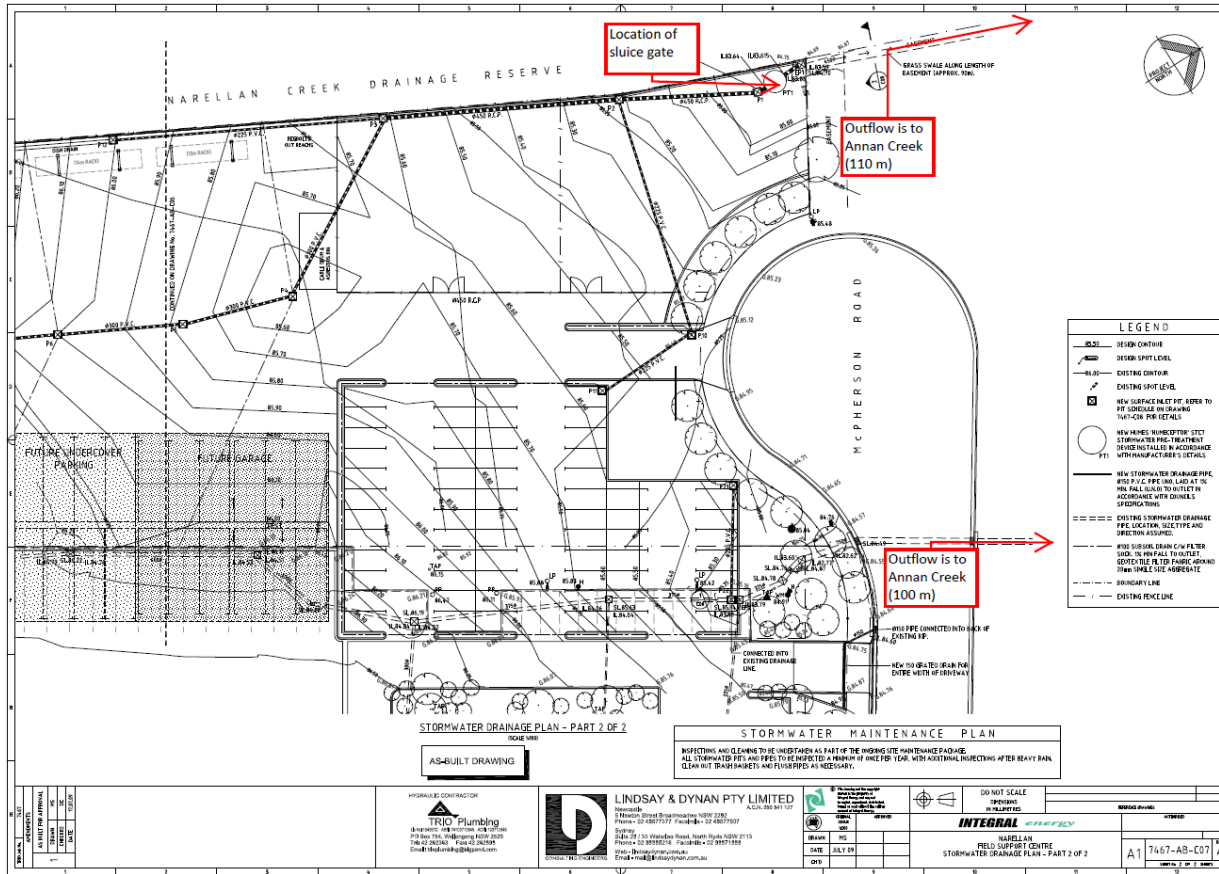
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## Figures

### Figure C- Stormwater Drainage Plan (2 of 2)



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## Figures



Figure D- Premises adjacent to stormwater system

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• **Appendix A**

**Appendix A – Records of Testing Events**

<b>Records of Testing Events</b>		
<b>Date of Testing Event</b>	<b>Names of staff member who carried out the testing</b>	<b>Signatures of staff member who carried out the testing</b>

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### Appendix A

<b>Records of Testing Events</b>		
<b>Date of Testing Event</b>	<b>Names of staff member who carried out the testing</b>	<b>Signatures of staff member who carried out the testing</b>





