

PULPIT POINT HOME OWNERS ASSOCIATION INCORPORATED

Pollution Incident Response Management Plan

Department: Marina Sub Committee
Activity Marinas and Boat Repairs- boat mooring and storage
Address 28 St Malo Avenue
EPA Licence Number 10542
Website address <https://pulpitpoint.com.au/>

Document Owner: PPHOA

Maintenance and Implementation Marina Sub Committee

Version	Date	Author	Change Description
V1	29/08/2012	M Hudders	Approved by Mgmt committee 30/08/2012
V1.01	04/09/2012	M Hudders	Remove ref to Duke, include Michael
V1.02	23/05/2013	M Hudders	Incorporate Fire and Rescue contact and spill kit modifications following audit
V1.03	23/03/2015	M Hudders	2015 Annual Review
V1.04	21/09/2015	M Hudders	Change of Management Committee Chairman & Secretary
V1.05	20/04/2017	M Hudders	Change of Management Committee Chairman
V1.06	10/04/2018	C Neilson	Change of Management and Marina Committee Chairman
V1.07	16/10/2018	C Neilson	Change of Marina Committee Members
V1.08	08/02/2021	M Hudders/ S Graham	Update to Contact Persons, add street and web addresses, licence, update testing log. Upload to Web site.

Pollution Incident Response Management Plan

The purpose of Pulpit Point Home Owners Association Pollution Incident Response Management Plan purpose is to identify risk and mitigation in relation to potential pollution incidents and to outline a response to a pollution incident

This document incorporates;

A definition of "Pollution Incident"

Identification of stakeholders in relation to licenced activity

Identifying and mitigating the risk of potential pollution incident

providing most appropriate response and control to a pollution incident

providing contact information for executive

providing contact information for relevant authority

identification of when appropriate notification of a pollution incident is required

identification of how and what information is publicised

to identify how often and by whom the pollution incident response management plan is tested

to identify how often and by whom the pollution incident response management plan is updated

Define Pollution Incident

An incident is required to be notified if there is a risk of 'material harm to the environment', 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.

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Stakeholder Roles and Responsibilities

Role	Responsibility	Key Contacts
Pulpit Point Home Owners Association Incorporated (License Holder 10542)	<ul style="list-style-type: none"> To identify and manage risk and inform Management Committees To Provide Pollution Incident Response Management Plan To record pollution incidents and provide statutory reporting To provide copy of plan if requested in writing To hold copy of plan accessible on site 	<p>Managing Agent Wellman Strata +61 2 8065 6575</p> <p>Facilities Manager Accord Property Services +61 2 8197 9610</p>
Marina Sub Committee	<ul style="list-style-type: none"> To activate Pollution Incident Response Management Plan or to delegate aspects of plan To Update Plan To Test Plan To Report Incidents immediately as required to Relevant Authorities To notify affected nearby neighbours (if any) 	<p>Managing Agent Wellman Strata +61 2 8065 6575</p> <p>Facilities Manager Accord Property Services +61 2 8197 9610</p>
Users Of Marina Facilities	<ul style="list-style-type: none"> To Assess Pollution Incident To Follow Pollution Incident Chart To Report Incident to Marina Sub Committee for Response Management To Report First Response Emergency Service if determined to be actual Pollution incident To identify immediate risk and inform the Marina sub committee 	<p>Contact details not published in this plan</p> <p>Available with Management Committee/ Managing Agent</p>
First Response Major Incident	<ul style="list-style-type: none"> To Provide Assistance for safely of human health or environment Fire and Rescue NSW 	<p>000</p> <p>000</p>

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Relevant Authorities – Subsequent responders	EPA Environment Line Fire and Rescue NSW (as appropriate) Service NSW (RMS Maritime) Northern Sydney Public Health (NSW Health) WorkCover NSW Hunters Hill Council	131 555 1300 729 579 131 256 9477 9400 131 050 9879 9400
Other Impacted Persons	To Assess Pollution Incident To Follow Pollution Incident Chart To be referred to Marina Sub Committee	Residents and Users of Facilities and Impacted Neighbouring Properties

Risk Assessment for pollution incident– Assessment of Hazards to relevant activity for Licence Holder 10542

Boat mooring and storage under Scheduled Activity of Marinas and Boat Repairs at and adjacent to 28 St Malo Avenue , Hunters Hill, NSW 2110

Description of potential hazards to human health or to the environment associated with Marinas and Boat Repairs activity are likely to be

1) Leaks of Diesel or Petrol upon refuelling

This is considered to be of medium environmental impact and low likelihood

- i) Mitigated by not having underground or on site storage tanks
- ii) Mitigated by not having pump refuelling capacity on site
- iii) Mitigated by not permitting refuelling from water-borne craft within the marina
- iv) Impact reduced by containment devices/ spill kits

2) Leaks of Diesel or Petrol or Oil from vessel bilges

This is considered of low environmental impact and medium likelihood

- i) Mitigated by owners residing in close proximity to their vessels
- ii) An increase is possible dispersing of after heavy rains if rain water and oil, fuel enters bilge
- iii) Impact reduced by containment devices/ spill kits

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3) Combustion and Fire of Petrol or Vessel

This is considered to be of medium to high environmental impact and high risk to human harm and extremely low likelihood

- i) Mitigated by not having refuelling capacity on site
Mitigated by owners residing nearby to vessels
- ii) Mitigated by not permitting refuelling from water-borne craft within the marina
- iii) Mitigated by providing firefighting equipment including hose reels and fire extinguishers on each arm

Risk increases at peak and festive seasons and with nearby fireworks, additional access or security measures to be considered for peak period

4) Leaks from Sewage Pump out facility

This is considered of low environmental impact and low likelihood

- i) Mitigated by connection directly in to mains sewer.

Risk increases at more active (Spring/Summer periods)

Risk Assessment and Management Table

Risk #	Risk and Description	Risk Chance	Risk Impact	Risk Priority	Risk Owner
1	Leaks of Diesel or Petrol upon refueling	Low	Medium	Medium	Marina Users
2	Leaks of Diesel or Petrol or Oil from vessels	Medium	Low	Medium	Marina Users
3	Combustion and Fire of Petrol or Vessel	Low	High	High	Marina Users
4	Leaks from Sewage Pump Out facility	Low	Low	Low	Marina Users

All residents have been provided with communication covering pump out facility, fuel spills, and fire-fighting equipment

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Inventory of hazardous substances

Marina has EPA Licence capacity of 112 vessels

The licence holder does not store hazardous materials, although hazardous materials are stored on site in individual owner's vessels

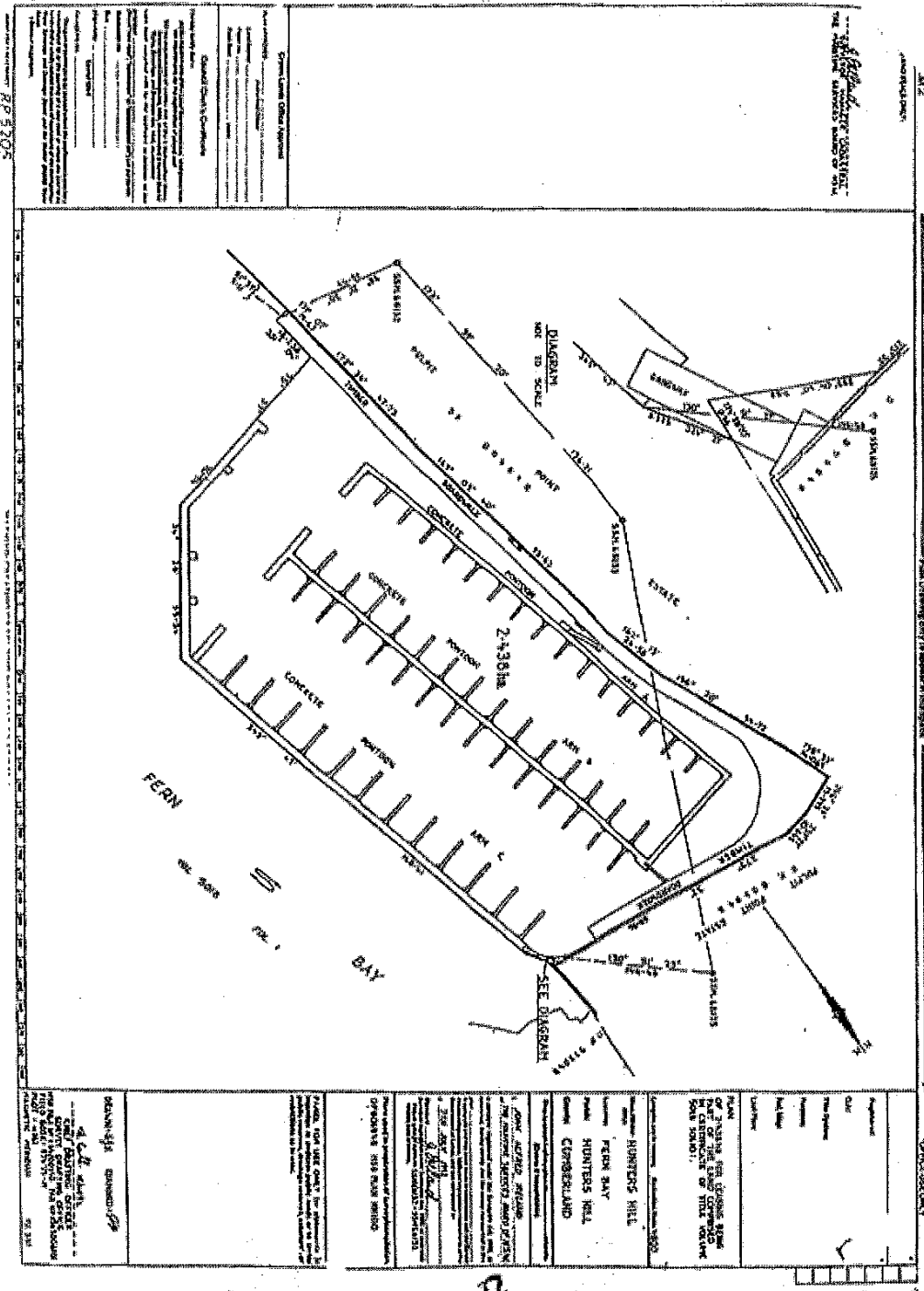
The Marina varies from 1/3 – 2/3 of capacity and we need make certain assumptions of vessel capacity at 2/3 full of its full tank capacities. At time of inventory 20/04/2017 we note 54 vessels are moored within the licenced premises.

Therefore collectively held within 54 owner's vessels we assess the following table to reflect the current inventory quantities of and types of potential pollutants, and corresponding calculation transposed assuming same type and kind of vessels is that marina is full and tanks are full.

Substance	Estimated Inventory Quantity	Potential Maximum Quantity
Oil	1080 litres	3790 litres
Diesel	24,650 litres	85,500 litres
Petrol	7800 litres	27,000 litres

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Plan of Site



<p>Site Name: Hunters Hill</p> <p>Site Address: 100-110, 115-125, 130-140, 145-155, 160-170, 175-185, 190-200, 205-215, 220-230, 235-245, 250-260, 265-275, 280-290, 295-305, 310-320, 325-335, 340-350, 355-365, 370-380, 385-395, 400-410, 415-425, 430-440, 445-455, 460-470, 475-485, 490-500, 505-515, 520-530, 535-545, 550-560, 565-575, 580-590, 595-605, 610-620, 625-635, 640-650, 655-665, 670-680, 685-695, 700-710, 715-725, 730-740, 745-755, 760-770, 775-785, 790-800, 805-815, 820-830, 835-845, 850-860, 865-875, 880-890, 895-905, 910-920, 925-935, 940-950, 955-965, 970-980, 985-995, 1000-1010, 1015-1025, 1030-1040, 1045-1055, 1060-1070, 1075-1085, 1090-1100, 1105-1115, 1120-1130, 1135-1145, 1150-1160, 1165-1175, 1180-1190, 1195-1205, 1210-1220, 1225-1235, 1240-1250, 1255-1265, 1270-1280, 1285-1295, 1300-1310, 1315-1325, 1330-1340, 1345-1355, 1360-1370, 1375-1385, 1390-1400, 1405-1415, 1420-1430, 1435-1445, 1450-1460, 1465-1475, 1480-1490, 1495-1505, 1510-1520, 1525-1535, 1540-1550, 1555-1565, 1570-1580, 1585-1595, 1600-1610, 1615-1625, 1630-1640, 1645-1655, 1660-1670, 1675-1685, 1690-1700, 1705-1715, 1720-1730, 1735-1745, 1750-1760, 1765-1775, 1780-1790, 1795-1805, 1810-1820, 1825-1835, 1840-1850, 1855-1865, 1870-1880, 1885-1895, 1900-1910, 1915-1925, 1930-1940, 1945-1955, 1960-1970, 1975-1985, 1990-2000</p>

<p>Scale: 1:1000</p> <p>North Arrow: [North Arrow]</p> <p>Site Name: Hunters Hill</p> <p>Site Address: 100-110, 115-125, 130-140, 145-155, 160-170, 175-185, 190-200, 205-215, 220-230, 235-245, 250-260, 265-275, 280-290, 295-305, 310-320, 325-335, 340-350, 355-365, 370-380, 385-395, 400-410, 415-425, 430-440, 445-455, 460-470, 475-485, 490-500, 505-515, 520-530, 535-545, 550-560, 565-575, 580-590, 595-605, 610-620, 625-635, 640-650, 655-665, 670-680, 685-695, 700-710, 715-725, 730-740, 745-755, 760-770, 775-785, 790-800, 805-815, 820-830, 835-845, 850-860, 865-875, 880-890, 895-905, 910-920, 925-935, 940-950, 955-965, 970-980, 985-995, 1000-1010, 1015-1025, 1030-1040, 1045-1055, 1060-1070, 1075-1085, 1090-1100, 1105-1115, 1120-1130, 1135-1145, 1150-1160, 1165-1175, 1180-1190, 1195-1205, 1210-1220, 1225-1235, 1240-1250, 1255-1265, 1270-1280, 1285-1295, 1300-1310, 1315-1325, 1330-1340, 1345-1355, 1360-1370, 1375-1385, 1390-1400, 1405-1415, 1420-1430, 1435-1445, 1450-1460, 1465-1475, 1480-1490, 1495-1505, 1510-1520, 1525-1535, 1540-1550, 1555-1565, 1570-1580, 1585-1595, 1600-1610, 1615-1625, 1630-1640, 1645-1655, 1660-1670, 1675-1685, 1690-1700, 1705-1715, 1720-1730, 1735-1745, 1750-1760, 1765-1775, 1780-1790, 1795-1805, 1810-1820, 1825-1835, 1840-1850, 1855-1865, 1870-1880, 1885-1895, 1900-1910, 1915-1925, 1930-1940, 1945-1955, 1960-1970, 1975-1985, 1990-2000</p>

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Control Measures – Persons Responsible for activating plan and contacting relevant authorities (noting that Marina users are to contact as first response Fire and Rescue NSW (000) in emergency situation) otherwise Marina Sub Committee members below are to notify all relevant authorities

Contact details table;

Representative	Contact Number	Purpose
Wellman Strata Management	61 2 8065 6575	To Activate plan and contact relevant authorities
Accord Property Services	61 2 8197 9610	

Control Measures – Contact Emergency Authority

Authority	Contact number	Call For Attendance
Fire / Police / Ambulance	000	Emergency Services
(Fire and Rescue NSW)	1300 729 579	Notifications Only

Then Marina Sub Committee Member is to call relevant authorities with 24 hour contact details below, pollution incident must now be notified to

Authority	Contact number
EPA (EPA environment line)	131 555
Hunters Hill Council	98799400
Workcover NSW	131050
Ministry of Health	Hornsby NSCC PHU (North Sydney/Central Coast AHS) Phone: (02) 9477 9400
Transport for NSW (Maritime)	131256 bus. hours / 000 emergency
Other authority as instructed by EPA	

Verbal notification is to be followed by notification in writing by Marina Sub Committee with authority of Management Committee within 7 days of the date on which the incident occurred

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Control Measures - Containment Equipment

The safety equipment on site to minimise the risks to human health or the environment include

Containment Devices /Spill Kits these are located in the bins located at the end of each arm.

Kit contents to contain individually adequate material to absorb 100litre spill, and each kit to contain adequate length of floating Oil in water absorbent containment booms adequate for containment between fingers

Inner Arm Kit Minimum 10m of booms

Middle Arm Kit Minimum 11m of booms

Outer Arm Kit Minimum 12m of booms

Noting than in case of oil/fuel spill to be contained between arms then the boom contents of two kits are to be used

Fire Fighting Equipment, hose reels and extinguishers are located along each arm of the marina

The Marina user is encouraged to use containment devices of spill kits or firefighting equipment when containment is possible by use of such devices

Distribution of Plan

The Pulpit Point Home Owners Association Incident Response Management Plan to be made public on web site;

<https://pulpitpoint.com.au/>

One full copy of the Pollution incident response management plan in printed format is accessible at all times at the community centre, and accessible to the Marina Sub Committee, or an authorised officer.

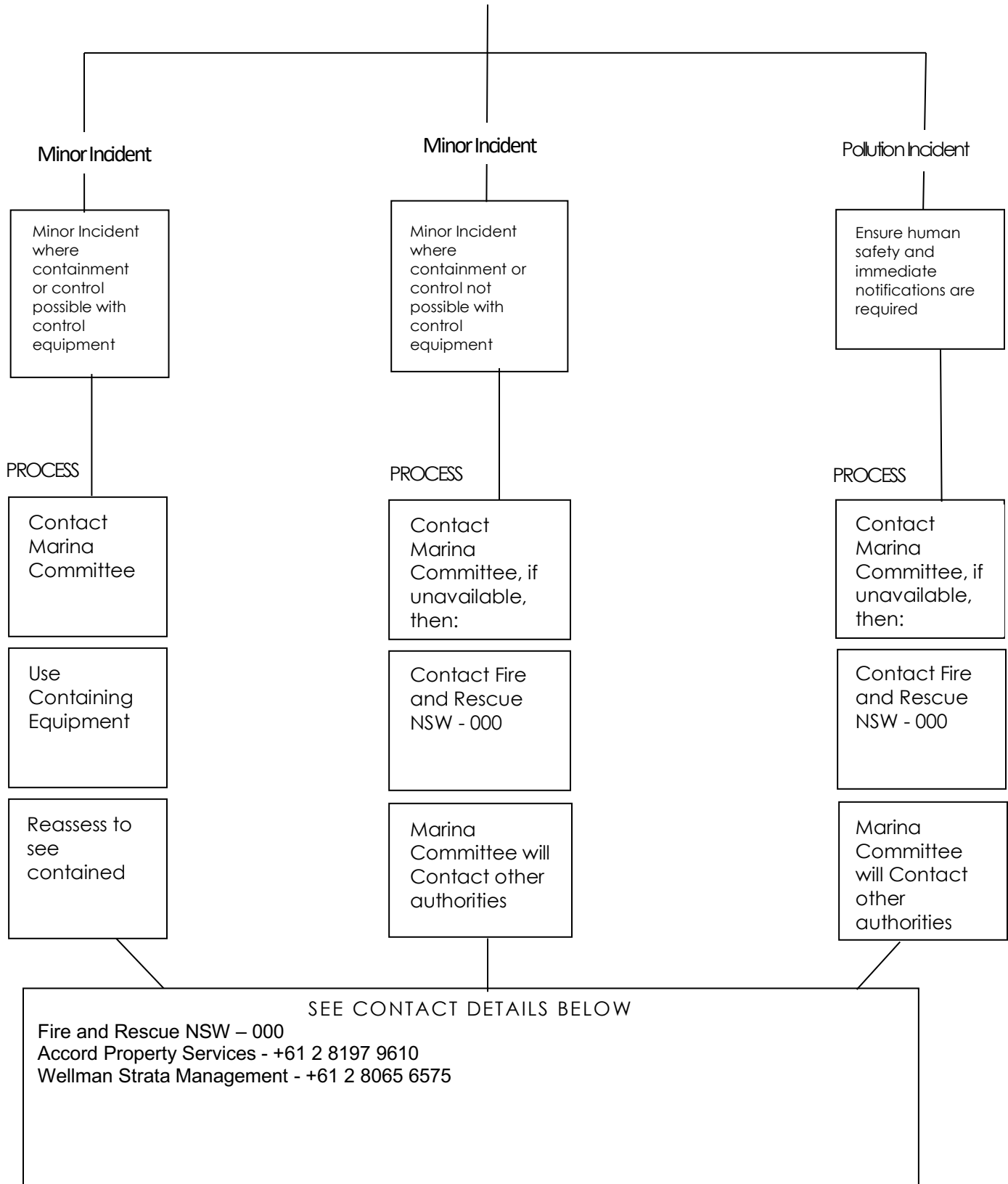
A copy must be provided to anyone applying to the licence holder with reasonable justification, requesting a copy.

Diagram

For Pollution Incident Response Management

At the scene it is necessary to determine if a pollution incident causing damage or potential damage of \$10,000 or greater has occurred

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Testing will be conducted March 2013 and September 2013, thereafter annually, and again within 1 month following a pollution incident

Plan is updated and version controlled by the Marina sub-committee

Testing will simulate scenarios including minor spill, testing contact enabled to authorities, utilising mobile phones from the three major service providers, and utilising simulation of spill kits, this may incorporate training for regular marina users

A record of tests along with incidents and complaints is to be maintained by Marina sub-committee and provided to the Management Committee annually in January for completion as appropriate of Monitoring and Complaints reporting in line with EPA Licence renewal terms.

Due consideration has been given to the quotation provided by Ramsay consultants. The sub-committee have determined that due to our low risk and unique circumstances that the key aspects for Pollution Incident Response Management are contained within this document.

Pollution Incident Response Management Plan Audit Log of Testing and Further action.

Record Name/s testing plan	Activity date	Outcome/Observations	Further Action
	28/04/2013	Variable Spill kit contents	Recommendation to Inventory and standardize for our circumstance
	23/05/2013	Contact detail change	Plan updated
	21/09/2015	Confirm Spill Kit Contents & Contact Details are correct	Plan updated
	20/04/17	Contact detail change	Plan updated
	10/04/2018	Contact detail change	Plan updated
Chris Nielson & Mark Hudders	29/01/2019	Noted light oil film in water and conducted review	Entry into Pollution Complaints Register, determined source outside of Marina
Marina Committee	21/11/2019	Marina Safety Briefing evening for community	Entry into log

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Plan Approvals

Prepared by: Mark Hudders and Marina Sub Committee

Approved by: V1.08 approval by Management Committee - TBC