



PIRMP

Pollution Incident Response Management Plan

Prepared by: Mitch Anderson, Waterfront Manager

Version 9.3: Updated 23/01/2025

Name of Licensee: (Including ABN)	Royal Sydney Yacht Squadron
EPL Number	11758
Premises name and address:	Royal Sydney Yacht Squadron, 33 Peel St, Kirribilli NSW 2061
Company or business contact details:	Name: David Edwards Position: CEO Business hours contact number: 02 90170171 After hours contact number: 0408 022 282 Email: david.edwards@rsys.com.au
Website address:	www.rsys.com.au
Scheduled activity/ activities on EPL:	Marinas and boat repairs
Fee-based activity/activities on EPL:	Boat construction maintenance (general)



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Executive Summary

- **Introduction**

The Pollution Incident Response management Plan has been prepared for Royal Sydney Yacht Squadron to set out specific requirements for achieving compliance with the relevant requirements introduced in the protection of the environment legislation Amendment act 2011 related to timely notification and management of the pollution incidents causing ‘material harm’.

- **Objectives**

The Objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about the pollution incident to the:
 - Royal Sydney Yacht Squadron Staff
 - Environmental Protection Authority
 - NSW Ministry of Health
 - SafeWork NSW
 - Fire and Rescue NSW
 - North Sydney Council
- Minimise and control the risk of pollution incident at the Squadron through:
 - Identification of risks
 - Development of planned actions
 - Implementation of those planned actions
- Ensure that the plan is implemented by:
 - Trained personnel with responsibility for implementing the plan
 - Regular testing for accuracy and suitability



- **Definitions**

The definition of a pollution incident is:

Pollution incident means an incident or set of circumstances during or as a consequence of which 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, is occurring 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, but it does not include an incident or set of circumstances involving only the emission of any noise.

Material Harm

1. Harm to the environment is material if:

- a. It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- b. 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

2. 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

For the purposes of this definition, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Environment means: Components of the earth, including:

- (a) Land, air and water, and
- (b) Any layer of the atmosphere, and
- (c) Any organic or inorganic matter and any living organism, and
- (d) human-made or modified structures and areas, and includes interacting natural ecosystems that include components referred to in paragraphs (a)–(c).



EPA means: Environment Protection Authority constituted by the Protection of the Environment Administration Act 1991.

A premise includes:

- (a) A building or structure, or
- (b) Land or a place (whether enclosed or built on or not), or
- (c) A mobile plant, vehicle, vessel or aircraft.

Pollution means:

- (a) Water pollution, or (b) air pollution, or (c) land pollution.

Activity means:

An industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).

Hazardous Areas

- **Fuel Supply and Storage**

RSYS has a 12,000 litre (L) petrol tank (ULP) and a 21,000 L diesel tank on the Site. Fuel is dispensed at the waterfront by trained Staff Members to RSYS Vessels and Members boats. The bunded fuel lines run under the hardstand and were replaced in 2008.

Product loss monitoring is reported by a statistical inventory reconciliation analysis (SIRA) system which has been in place since November 2010.

Tanks and lines are pressure tested annually by **Leighton O'Brien Field Services**.

- **Trade Waste Water**

The RSYS operates a trade waste water recycling plant on the hardstand. This facility operates in a bunded area. The waste water enters the pit through a series of basket floor wastes where most of the solids are trapped. The water then flows to the first flush tank. Here a pump transfers the water to the bag farm to remove finer solids and then into the mixing and pH



correction tank and then through a CPI to remove any oil and fine solids. The water is pH corrected by the addition of a chemical which also has a flocculant called Hydrofloc.

During the rainfall a sensor turns off the pump inside the first flush tank and thereby traps the first flush volume of 4000 litres. Once this volume is reached excess water flows directly to stormwater.

- **Dangerous Goods Store**

The RSYS maintains a dangerous goods store for flammable and dangerous goods. This area has restricted access and is purpose-built.

*See Diagram 1 - Page 9

Pre-emptive actions in place

- **Fuel Supply and Storage**

Action	Description
Ground Water Monitoring	Monitoring is conducted by Douglas Partners in accordance with UPSS Compliance
Bunded and Sheltered Bowsers	Fuel Bowsers have a physically raised bunding and are sheltered
Fuel Spill Kits	The Fuel Spill Kits are in place and checked regularly
Remote Fuel Shut off (Appendix A)	A remote fuel shut switch is located away from the bowser prior to the fuel entering the bunded lines under the hardstand



- **Trade Water Waste**

Action	Description
Equipment Inspections	Physical inspection of plant is part of a regular audit (Veolia)
Water Testing	Regular analysis of samples sent to Sydney Water (ALS - Aust. Lab Services)
Regular Servicing / Cleaning	Tanks are serviced and cleaned as recommended.
Bunded Work Area	Inspection of the bunded area is part of a regular audit

- **Dangerous Goods Store**

Action	Description
Minimum Par Levels	Minimum stock of all goods. Stock ordered only for specific jobs with minimum amounts stored
Regular Inspections	Inspection of the dangerous goods area is part of a regular audit
Restricted Access	Access is restricted to authorised staff only

Inventory of Pollutants

Pollutant	Maximum quantities likely	Location
Unleaded Petrol	21,000 litres	Underground tank (Diagram 1)
Diesel	12,000 litres	Underground tank (Diagram 1)
Thinners	120 litres	Dangerous Goods Store
Antifoul	140 litres	Dangerous Goods Store
Engine Oil	100 litres	Dangerous Goods Store
Hydraulic oil	30 litres	Dangerous Goods Store
Phosphoric acid	40 litres	Dangerous Goods Store



Underground tank and Dangerous Goods Store locations (see Diagram 1)

Royal Sydney Yacht Squadron (RSYS) stores and dispenses a limited amount of fuel to its members by staff, as well as safe storage of certain supplies necessary for ship repair. RSYS has a comprehensive system for safe handling of such materials. The site uses this system that includes amongst others:

- Dangerous Goods and Hazardous Substances Manifest and Notification Procedure
- Material Safety Data Sheets
- Procedures for safe storage and use of these materials



Diagram 1





Training

Training tools including manuals and PowerPoint presentations and are to be regularly reinforced at weekly toolbox talks with all boatshed staff and these procedures are to be incorporated in the Area Safety Warden inductions and training sessions.

The above staff are to meet quarterly to review and reinforce procedures. **An annual test of these plans is to be held prior to 1 December each year.**

The record of training and attendance sheets are to be kept with the hard copy of this plan.

Spill Management Plan

The Royal Sydney Yacht Squadron is committed to being a responsible and safe waterfront operator by ensuring that practices and policies are employed that minimize its impact on the environment as much as possible.

This spill management plan approaches these objectives in three ways; avoiding spills, availability of spill equipment, and spill response procedures. In addition emergency contacts are listed at the end of this plan.

- **Avoiding Spills**

The best way to deal with spills is to avoid them all together. Detailed below is a list of procedures with staff responsibility and time frames attached that will assist in reducing the likelihood of a spill occurring at the Royal Sydney Yacht Squadron Waterfront.

Check Item	Responsibility	Time Frame
Fuel hoses are free from cuts and abrasions	Waterfront Manager	Monthly
Fuel tank on/off valves are free and not seized	Waterfront Manager	Monthly
No fuel leaks around the fuel bowser	Dock Master	Daily



Fuel line running underneath the hardstand are clear of signs of corrosion or damage.	Dock Master	Annually
Containers in dangerous goods store show no signs of leakage	Waterfront Manager	Daily
Bunding to hardstand shows no signs of breach	Dock Master	Daily

- **Spill Equipment**

The following equipment, and its location, is provided on the hardstand for dealing with spills.

Spill Equipment	Location
- Absorbent booms	Red bin next to fuel bowser
- Absorbent pads	
- Absorbent pillows	
Blue Large spill packs (2x)	Top shelf storage racks in boatshed
- 44m surface boom	
- 25 sheets 430x480 oil sorbent cloth	
Additional absorbent material	Yellow bin next to fuel bowser
Portable Spill containment pack	Green bin next to fuel bowser
- 15 pads oil sorbent	
- 2 absorbent booms	
- Protective gloves	
- Disposable bag	

- **Responding to Spills**



1. Stop the source of the spill if it is safe to do so

- a. The fuel pump shut off is located at the edge of the hard stand between the fuel pump and the Sanivac at ground level.
- b. The fuel flow shut off valves for the fuel supply lines that run under the hardstand are located at the back of the hardstand on the wall as shown in the attached photo (see next page).

2. Contain the spill

- a. Use booms to surround the spill to enable clean-up.
 - i. Small spill containment booms and absorbent equipment is contained in the RED wheelie bin positioned between the fuel bowser and the Sanivac.
 - ii. Larger volume spill booms are contained in two spill containment packs located in the Dock Master's office.
- b. Booms should be joined together before deployment.
- c. If the spill is major and cannot be contained by Royal Sydney Yacht Squadron Resources the Sydney Ports Authority Emergency Response 24 hour line should be called on 9296 4000.

3. Clean up the spill.

- a. The spill should be cleaned up as soon as possible to protect the local environment.
- b. Oil selective absorbents will take up hydrocarbons without absorbing water. Apply absorbent pads to the spill surface and allow time for the spill to be absorbed.
- c. Used spill control and absorption materials must be stored carefully for appropriate disposal to avoid secondary environmental contamination. The RED wheelie can be used for the storage of used materials.
- d. If the spill is major and cannot be cleaned up by Royal Sydney Yacht Squadron Resources the Sydney Ports Authority Emergency Response 24 hour line should be called on 9296 4000.



4. Report all spills

- a. All spills must be reported to using the Royal Sydney Yacht Squadron Incident Report form and forwarded to the Club Secretary as soon as possible following the incident.
- b. Following containment and clean-up of spills the spill should be reported to the Department of Environment and Climate Change on 131 555.

This plan is an extract from the Royal Sydney Yacht Squadron Emergency Procedures Manual and is to be used in in conjunction with the Emergency Procedures Manual and the RSYS Waterfront Work, Health and Safety Policy



Contact List

Emergency Service	'000' or call on VHF Channel 16
Water Police	'000' for emergencies
Water Police (less urgent issues)	93207499 Water Police Balmain base
Oil and Fuel Spill Emergencies	9296 4000 Sydney Ports Authority Emergency Response 24 hours
NSW Maritime Authority	13 12 56
North Sydney Police Station	9956 3199
RSYS Waterfront Manager	Mitch Anderson 0493 584 771
RSYS Maintenance Supervisor	Hamish Green 0418 446 491
RSYS Chief Executive Officer	David Edwards 0408 022 282

- **Who to contact for advice out of business hours**

If you need advice outside on what to do in a certain situation out of business hours the following Management Personnel should be contacted in the following order:

1) Mitch Anderson	Waterfront Manager	0493584771
2) Hamish Green	Maintenance Supervisor	0418 446 491
3) David Edwards	CEO	0408 022 282
4) RSYS House	Duty Manager / Security	02 9955 7171

- **Who to contact in the case of an emergency**

If an emergency occurs involving damage to property, injury to individuals, fire or fuel/oil spill, etc. the following personnel should be called until contact is achieved.

1) Mitch Anderson	Waterfront Manager	0493 584 771
2) Hamish Green	Maintenance Supervisor	0418 446 491
3) David Edwards	CEO	0408 022 282
4) RSYS House	Duty Manager / Security	02 9955 7171



Subsequently the appropriate authority below should be notified immediately:

EPA	Environment Line	131 555
Public Health Unit	Hornsby Hospital	02 9477 9123
SafeWork NSW		13 10 50
North Sydney Council		02 9936 8100
Fire and Rescue NSW		000

- **Relevant information to be given when notifying the incident**

The relevant information to be given according to section 150 of the POEO Act (1997) when notifying the incident to the regulatory authorities is as follows:

- a. Time, date, nature, duration and location of the incident
- b. 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 involved, if known
- d. The circumstances in which the incident occurred (including the cause of the incident if known)
- e. Action taken or proposed to be taken to deal with the incident any resulting pollution or threatened pollution, if known
- f. When the information relating to items c), d) or e) is not known at the time of verbal notification, this information must be provided once it becomes available

- **Actions to be taken immediately after a pollution incident**

The Incident Management team or those directly dealing with the incident in their absence will:

- a. Liaise with the appropriate authorities
- b. Engage contractor that will organise any clean up (Cleanaway Emergency Spill Management 1800 774 557)
- c. Inform any neighbours of the impact on their property



- **Communicating with Neighbours and the local community**

Consultation with community members during and/or after a reportable pollution incident will be undertaken in accordance with this PRIMP. The police will generally take on the role of interfacing with site neighbours but may require the assistance of RSYS personnel. This role (and prior to police arrival if necessary) should be delegated by the RSYS Manager on Duty so as they can remain at the site. Where emergency services do not take on this role, RSYS will consider utilising various communications tools such as phone calls, door knocking and letter box drops as appropriate for the incident and its impact.

Availability of Plans

This PRIMP will be available on the RSYS Website and will be supplied free of cost to anyone requesting the plan in writing generally within 14 days of the request being made.

PIRMP testing details				
Date Tested:	Tested by:	Details of test:	Finding of test,	Next scheduled
21 January 2025	Mitch Anderson and staff	Simulated spill, fuel cut off procedures	including issues identified: New spill kits purchased	testing date: 21 January 2026



Appendix A



Remote Fuel Shut off Valve