

COVE MARINE PTY LIMITED

**60 FREDERICK DRIVE
OYSTER COVE NSW 2318**



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Revised Date: 5th July 2024

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1. Key details

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|-------------------------|--|
| Licensee | Cove Marine Pty Limited |
| Licence No. | 13223 |
| Premises name | Cove Marine Pty Limited |
| Address | 60 Frederick Drive Oyster, Cove, NSW, 2318 |
| Licensee contact | Robert Bailey, Managing Director |
| Key activities | Maintenance and repair marine craft Retail sale motors & accessories etc. |
| Trading hours | Monday to Friday 8.00 to 4.00 Weekend DIY customers by appointment |
| EPA Region | Hunter |
| Regional Officer | Kyle Finlay |

2. Site background

Cove Marine Pty Limited is a family owned and operated business located on the shores of Port Stephens at Swan Bay. It adjoins the village of Oyster Cove with a population of about 150. The Company provides slipping facilities, vessel storage plus a range of marine servicing and repair services to boat owners. Work can be carried out on a 'do-it-yourself' or contract basis. The average annual turnover of vessels through the yard is about 150. The Company employs 7 employees trained in vessel hauling, shipwright, mechanical repairs plus support administrative and sales functions.

The Company operates under an Environment Protection Licence (No. 13223) with the NSW Environment Protection Authority. This licence is regularly amended as regulations and circumstances dictate. Cove Marine Pty Limited is currently addressing some environmental issues (PAH and heavy metal ground contaminates) sourced from past oyster farming and boat maintenance operations on the site. As these contaminants are contained within the substrate, they pose a low risk to the ecosystem and to personnel accessing the

premises. By nature, marine servicing operations have the potential to deliver some risks to the environment and to personnel engaged in the work. These include:

- Slipping and vessel transportation to work cradles located within the yard.
- Vessel washdown and descaling
- Sanding of materials such as timber, paint, or fiberglass
- Painting of antifoul.
- Mechanical servicing requiring oils and lubricants.
- Storing of chemicals including paints, solvents, polishes etc

Cove Marine Pty Limited has previously implemented a range of measures to minimize environmental incident exposure. These include an *Occupational Health and Safety policy*, to protect staff and customers from accidents and exposure to chemicals. Storage of fuels, oils, paints, solvents, and chemicals meet regulatory standards. Air borne pollutants such as dust is minimized with the mandatory use of vacuum dust collecting sanders. Work areas are either sealed or particle covered to minimize dust. Customer work activities are strictly controlled by a 'Customer Site Rules agreement. The site is securely fenced to exclude all other than staff, duly signed in customers and visiting suppliers.

Liquid pollutants such as wash down water containing hull growth material and antifoul residue (in solution or suspension) are collected within a sealed and bunded enclosure. This water then drains to sedimentation pits and is pumped to a wastewater treatment plant.

Cove Marine Pty Limited management is working closely with representatives of the Newcastle EPA Regional Office to achieve sound environmental management and compliance with the regulations. The Company subscribes to 'best practice' policy.

3. Legislative requirements

3.1 Definition of 'pollution incident'

The following *Pollution Incident Response Management Plan* takes account of the **Protection of the Environment Operations Act (1997) Section 147**. The plan identifies potential environmental incident risks which could harm the environment, human beings and/or the surrounding property. Actual or potential 'loss or property damage more than the \$10,000 is taken as the control. An environmental pollution incident could be a liquid spillage, a gas leak, dust or other airborne contaminant, chemical damage etc. Noise impact is excluded in accordance with the Act.

3.2 Implementation of the plan

The plan (PIRMP) recognizes the Company's legal and moral obligations to immediately address environmental incidents. This requires emergency corrective actions to control the causes of the incident. Assistance to personnel injured as a result is to be rendered. Notification of all relevant authorities identified in the plan plus contact and advice to neighbours to the site is of urgent priority.

Pre-emptive obligations include the training of all staff, the provision of safety equipment and the familiarization of the plan by the staff. Close supervision of all customers working with hazardous materials within the site is necessary. The plan is to regularly be tested and updated to reflect current circumstances.

4. Identification of site hazards

4.1 A range of petroleum-based fuels, oils and lubricants, paints and solvents are stored on the site. These products are contained in approved tanks (both above and below ground), drums and manufacturer supplied cans. Above ground fuel is stored in covered tanks on concrete bunded floors.

Emergency fuel/oil spillage clean up equipment is located adjacent to these tanks.

4.2 No bulk liquified petroleum gas (LPG) is stored on the site. However, some vessels may house LPG in domestic cylinders attached to the vessels. Such installations must, by law, comply with the relevant code.

Fire extinguishes and hoses are located adjacent within the site.

4.3 Waste process water is collected within the bunded wet bay drained to two sedimentation pits then pumped to the filtration plant. Clean re-usable water is then pumped to a 10 KL storage tank where it is available for later re-use. Isolation and shut-off valves protect this storage. The system is fully contained having a very low spillage risk.

Waste process water unsuitable for re-use (about 10%) is pumped to a dedicated 5 KL tank where it is tinkered off site as required. This wastewater is considered hazardous.

4.4 Storm water run-off from the site flows, principally to the waters of Port Stephens. A flow path of about 30% of the site area drains easterly to an open drain, the responsibility of Port Stephens Council. The drain flows direct to the bay. Some rainwater ingress percolates to the subgrade and the aquifer underlying the land. An environmental incident from flooding is most unlikely as positive ground gradients allow full drainage. Contamination of surface water is minimal as site rule preclude the scraping of vessels over bare earth (ground sheets are mandatory)

No special pollution provisions are responsible in the management plan for storm water.

4.5 Sewage wastewater from the two amenity blocks on the site flow direct to Council approved septic tanks. Surcharge events, although most unlikely, would be immediately cleaned up followed by clean water dispersal and disinfectant sanitation. Any exposure by staff to the same would be treated by standard practice cleansing etc with the necessary clothing (gloves, boots) protection.

4.6 Other risk hazards could include exposure to chemical spills and dust inhalation from liberated contaminants and ground loss. These risks are minimal. Any incidents would be dealt with by staff adopting first aid measures.

4.7 There is a very low risk (likelihood) of hazard occurrence within the site and arising from the nature of operations carried out. All fuels/oils etc. are contained within industry approved storages (bunded as required). Spillage of the very limited quantities of marine paints, solvents etc. would be contained to small quantities (part of an opened can) where instant mop-up actions are mandatory. Dust suppression measures are tightly controlled with the use of suction vacuum equipment. Ground dust is limited by the presence of a tile particle cover. Process water (as in vessel wash downs) are collected within a dedicated wet bay area and piped to a treatment facility. A substantial dilution factor applies to this process water.

4.8 Pre-emptive actions to minimize or prevent any risk of harm to human health or the environment include the daily inspection of all fuel/oil, paint/solvent storages, the inspection of the process water collection system and monitoring of stored water quality parameters, the daily surveillance of all work sites (particular attention to any DIY work areas) to ensure compliance with work agreements. The checking of all safety and spill clean-up equipment is included. All staff and visitors to the site are obliged to wear minimal safety attire. The Company maintains a daily checklist sign-off document to cover the site inspections.

5. Inventory of pollutants

| POLLUTANT | MAXIMUM QUANTITY | TYPICAL QUANTITY | STORAGE ARRANGEMENTS |
|-------------------------------|-------------------------|-------------------------|--|
| Distillate | 16500 Lt. | 3000 Lt | Above ground tank Covered enclosure with bunded concrete floor |
| Liquid petroleum Gas (LPG) | 50 Kg. | 50 Kg. | Gas bottles located on vessels |

| | | | |
|--------------------|---------|---------|-----------------------------|
| Paints | 250 Lt. | 150 Lt. | 4 Lt. sealed cans |
| Solvents | 100 Lt. | 50 Lt. | Sealed cans & drums |
| Adhesives/sealants | 50 Kg. | 40 Kg. | Sealed tubes |
| Oxy/acetylene gas | 50 Kg. | 50 Kg. | Industry cylinders |
| Oils | 2500Lt | 1000Lt | 205/20L & Retail Containers |

6. Safety equipment

The following safety equipment is kept on the premises.

- Fuel/oil clean up equipment
- Emergency pumps
- Air breathing equipment
- Storage drums
- First aid kits
- Protective clothing
- Fire extinguishers and hoses
- Wash down (eye etc) showers/basins
- Emergency alarm horn

Note. All Company staff have basic first aid training and access to First Aid kits stored on the premises. The Company has implemented a strict occupational health and safety policy to cover all staff members, customers, and visitors to its site. As part of this policy an emergency evacuation assembly point immediately outside the premises has been established. All personnel visiting the premises must sign in on arrival or departure. A site emergency would automatically trigger contact with these people and involve their escort to the assembly point for account.

7. Key contacts

| Agency | Phone number |
|---|---|
| • Cove Marine Managing Director | 49824832 (Bus) 49824123 (A/h) 0419223453(Mob) |
| • Cove Marine Yard Supervisor (Mick Noon) | 0412572465(Mob) |
| • NSW Fire & Rescue Service | 000 |
| • NSW Police Service | 000 |
| • NSW Ambulance Service | 000 |
| • NSW Dept. of Health | 93919000 |
| • Workcover NSW | 131050 |
| • Environment Protection Authority | 49086800 |
| • NSW Dept. of Fisheries | 49821232 |

- Marine Park Authority 49848270
- NSW Roads & Maritime Service 132213 / 1300308349
- Port Stephens Council 49800255 A/H 0408493378

8. Communication with neighbours and relevant authorities

The Cove Marine Pty Limited premises at Oyster Cove is adjoined by the following landowners:

- Western boundary...Land & dwelling owned by Mrs. Maree Hoyle
- Southeastern boundary... Land and a distant dwelling owned by a Mr. Geoff Miles
- Southern boundary. A Company Road, thence a dwelling owned by a Mr. Don Watkins.
- Southern boundary...Vacant land owned by Cove Marine Pty Limited

The Company's land lies to the north of Frederick Drive, Oyster Cove, a village comprising about 34 houses. No sensitive residential establishments such as Nursing Homes, Hospitals, Aged Care facilities, schools etc. are located within the village.

- Emergency contact, in the event of a serious environmental incident, would be made by Company staff and family members, in person, direct to the landowners and occupiers. All properties are readily accessible (within 200 metres) of the Company's offices and owners' residences. If unattended printed advice notes would be left at the door.
- Emergency contact with local and relevant authorities in the event of a pollution incident is affected by telephone as per the contact list in Sec 7.

As the natural drainage profile of the Cove Marine Pty Limited site is away from all neighbouring properties (to the waters of Port Stephens) water borne pollutants would not affect them. Air borne pollutants, such as excessive dust or gas escape, could drift towards some of the neighbouring properties but would most likely be dispersed by any prevailing wind responsible for the drift.

9. Incident response action

The actions to follow immediately after a pollution incident include but are not necessarily confined to the following. The nature and severity of the incident will largely determine their sequence. The actions could include the simultaneous attention of all trained staff. The actions include:

- The sounding of the site alarm horn
- Immediate phone contact to emergency authorities via phone 000
- Marshalling of all site visitors to the emergency evacuation point

- Immediate attention to any injured or incapacitated persons on site
- Action to correct (immobilize etc) the source of the pollution such as system shutdown
- Clean up operations where necessary.
- Documentation (including photographs) of pollution causes and responses.
- Post incident review to isolate circumstances leading to the incident.
- A remedial action plan to eliminate recurrence of risk factors is to be prepared.
- Full report to EPA and relevant authorities

The Cove Marine Managing Director, and in his absence, the Yard Supervisor, is to co-ordinate all emergency actions, their priorities, and responses. Critical attention is to be directed towards the minimization of harm to human health. The systematic notification of all relevant authorities forms part of this responsibility.

10. Maps

A site map showing the principal buildings, work areas, bulk fuel storages, fire hoses and extinguishers, natural drains etc is attached as an annexure to this plan.

Refer to page 8 for Site Map

11. Staff training

Adoption of this plan will require the Company to fully familiarize all staff with its contents. Regular training and discussion sessions are scheduled and will be documented.

Group sessions are to be conducted. Reinforcement of procedures will form part of these sessions. Where practical the Company will make available resources for off-site staff safety training.

12. General

Registered copies of this Pollution Incident Response Management Plan will be distributed to all employees.

A copy of the Plan is available to the public in the Company's offices at all times. Authorized officers of the EPA or other relevant authorities have access to the Plan.

The Company will test the Plan, in a prescribed manner, at least every 12 months. Testing could include desktop simulations and yard drills that reflect possible incidents.

13. Risk assessment matrix

**COVE MARINE PTY LIMITED
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
RISK ASSESSMENT MATRIX**

| ITEM | ISSUE | OCCURRENCE LIKELIHOOD | IMPACT | RISK | MANAGEMENT STRATEGIES |
|------|---|--------------------------|---|--|--|
| 1 | Mechanical failure in process water collection system & treatment plant | Possible | Escape of wastewater to ground & waters of Swan Bay | Low Wetbay sealed & bunded to collect spillages | Daily check of all mechanical components Water quality compliance monitoring |
| 2 | Structural failure of above ground fuel storages & pipework | Unlikely | Escape of fuel to ground | Low Bunded concrete enclosures | Daily check of tanks, support structures & pipework |
| 3 | Corrosion failure in below ground fuel tanks | Possible | Escape fuel (petrol) to ground | Moderate Risk to groundwater contamination | Regular fuel level monitoring of tanks |
| 4 | Spillage of paints or solvents to ground | Unlikely | Small quantity contaminant to ground | Low | Storage of all products in enclosed sealed areas Strict customer rules on container handling Ground sheets in use under work sites |
| 5 | Noise pollution | Possible | Disturbance to neighbours | Low | All machinery noise suppressed Set hours of operation within premises Surrounding area zoned Industrial 4(a) |
| 6 | Airborne pollution | Possible | Wind blown dust contaminants | Low | All sanding operations with vacuum collection Site areas dust suppressed with crushed tiles |

DIAGRAM OF SITE

