



Environment Compliance Report Requirements for Preparing and Implementing Pollution Incident Response Management Plans

More information

For technical information on the matters discussed in this paper contact Compliance and Assurance Section on (02) 9995 5000.

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Glossary

ARA	Appropriate regulatory authority
Audit	A systematic, independent and documented verification process of objectively obtaining and valuating audit evidence to determine whether specified criteria are met
Audit criteria	The audit criteria are defined requirements against which the auditor compares collected audit evidence and criteria may include regulatory requirements, standards, guidelines or any other specified requirements.
Audit scope	The scope defines the extent and boundaries of the audit such as locations, organisational units, activities and processes to be audited, and the time period covered by the audit
Compliance	There is sufficient and appropriate evidence to demonstrate the particular requirement has been complied with and is within the scope of the audit.
Environmental harm	Includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.
Environment Protection Licence (EPL)	A licence that authorises the carrying out of scheduled development work or scheduled activities or controls water pollution arising from non-scheduled activities, being a licence issued under Chapter 3 of the <i>Protection of the Environment Operations Act 1997</i> and in force.
Licensed (premises)	<p>A premise (as defined in the <i>Protection of the Environment Operations Act 1997</i>; POEO Act) on which an activity listed in Schedule 1 of the POEO Act is carried out. The person or company undertaking the activity is required to hold an Environment Protection Licence to carry out the activity.</p> <p>Premises includes:</p> <ul style="list-style-type: none">(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.
Non-compliance	Clear evidence has been collected to demonstrate the particular requirement has not been complied with and is within the scope of the audit
Pollution	Means water pollution, air pollution, noise pollution, or land pollution.

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.
Premise	A facility where a scheduled or non-scheduled activity is undertaken.
Public register	<p>The public register under s.308 of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) is an online searchable database and contains:</p> <ul style="list-style-type: none"> · environment protection licences · applications for new licences and to transfer or vary existing licences · environment protection and noise control notices · convictions in prosecutions under the POEO Act · the results of civil proceedings · licence review information. Submissions regarding licence review can be made at any time · exemptions from the provisions of the POEO Act or regulations · approvals granted under cl.9 of the POEO (Control of Burning) Regulation · approvals granted under cl.7A of the POEO (Clean Air) Regulation.
Scheduled activity	An activity listed in Schedule 1 of the <i>Protection of the Environment Operations Act 1997</i> .
Waste tracking	The transport of some wastes presents a high risk to the environment. These wastes must be tracked when transported into, within or out of NSW. The waste consignor, transporter and receiving facility all have obligations to ensure that the waste is properly tracked.

Executive summary

Changes to the *Protection of the Environment Operations Act 1997* (POEO Act) in 2012 require holders of an Environment Protection Licence (EPL) to prepare and implement a pollution incident response management plan (PIRMP). The legislative requirements that relate to the preparation, keeping, testing and implementation of PIRMPs are set out in Part 5.7A of the POEO Act 1997 and Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (POEO General Regulation). The Environment Protection Authority (EPA) has completed a compliance audit program to determine the extent to which holders of EPLs are complying with the legislative requirements relating to PIRMPs. The EPA completed audits of 30 licensed premises regulated by the EPA.

The objectives of the audits were to assess the level of licensees' compliance with the requirements of Part 5.7A of the POEO Act 1997 and Part 3A of the POEO (General) Regulation 2009 relating to the preparation and implementation of PIRMPs, and to provide information to inform the review of the EPA's *Environmental Guidelines: Preparation of pollution incident response management plans*.

The auditors examined PIRMPs prepared by the licensees to assess whether the plans had been prepared and implemented in accordance with Part 5.7A of the POEO Act and Part 3A of the POEO (General) Regulation.

About this report

This report summarises the findings of the compliance audits completed. The report also:

- provides guidance to licensees on how they can improve their level of compliance with the requirements to prepare and implement a PIRMP and
- informs other initiatives that the NSW Government has recently implemented to ensure that pollution incidents are managed appropriately.

Key findings

A total of thirty licensees were subject to the compliance audit. All licensees audited were found to have prepared a PIRMP.

Twenty-two licensees were found to have complied with over 80 per cent of the audited requirements. Of these, fifteen licensees were found to comply with 90 per cent of the audited requirements. One licensee was found to be fully compliant with all the audited requirements.

Although all licensees had plans in place to respond to pollution incidents, some plans did not include all of the required information. The audit found that some of the plans did not include;

- maps that showed the location of the premises, the surrounding area likely to be affected by a pollution incident, and the location of stormwater drains.
- an inventory of all potential pollutants
- the maximum quantity of potential pollutants able to be stored on site
- the mechanisms for providing early warnings and updates to premises in the vicinity in the event of a pollution incident

- the contact details for all relevant authorities
- all the contact details for key individuals responsible for activating plans, notifying relevant authorities and managing the response to a pollution incident.

The audits also found that some licensees were not publishing certain required information about their plans on a publicly available website of the licensee.

A follow-up by the EPA has confirmed that all issues identified during the compliance audits have been addressed.

The EPA will continue to monitor licensees' compliance with the requirements of the POEO Act and POEO (General) Regulation in relation to preparation, keeping, testing and implementation of PIRMPs.

Related initiatives

Pollution incident notification requirements

Changes have been made to the provisions in the POEO Act relating to the duty to notify pollution incidents. These changes commenced on 6 February 2012, and are intended to ensure that appropriate authorities have the information they need to respond to the incident effectively and in a timely manner.

A pollution incident is required to be notified, under s.148 of the POEO Act if there is a risk of material harm to the environment. Pollution incidents are required to be notified *immediately* to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW, and the local council.

These strengthened provisions will help ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

For more information see www.epa.nsw.gov.au/pollution/notificationprotocol.htm.

PIRMP requirements for trackable waste transporters

The requirements to prepare, keep, test and implement a PIRMP also apply to transporters of trackable waste who are licensed by the EPA.

For more information see www.epa.nsw.gov.au/owt/index.htm

Ongoing compliance and enforcement activities

The EPA will continue to pro-actively monitor licensees' levels of compliance with the requirements to report pollution incidents immediately, and the requirements relating to PIRMPs, using a range of mechanisms that include site inspections, targeted compliance audits and campaigns, and investigating complaints relation to pollution incidents.

In addition, all licensees must report annually to the EPA on their level of compliance with licence conditions, including details of their compliance with the requirements to prepare, implement and test their PIRMPs.

Introduction

The NSW Government introduced an extensive reform package to strengthen environmental regulation including provisions set out in the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) that includes:

- establishing the Environment Protection Authority (EPA) as an independent, accountable and modern environmental regulator
- strengthening the requirements for industry to report and respond to pollution incidents
- improving communication and information flow to the community about industry environmental performance, and
- ensuring response agencies are well coordinated and have the necessary information to effectively manage and respond to pollution incidents.

The EPA has completed a targeted compliance audit program of thirty EPA regulated premises to confirm that licensees understand and are complying with the requirements.

The POELA Act introduced several changes to improve the way pollution incidents are reported, managed and communicated to the general community, including a new requirement under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) that requires the holders of Environment Protection Licence (EPLs) to prepare, keep, test and implement a pollution incident response management plan (PIRMP).

These requirements were introduced to ensure that licensees have measures to protect local communities and the environment from a pollution incident, and that licensees are well prepared to manage and respond, should pollution incidents occur.

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (POEO General Regulation). In summary, the requirements that relate to PIRMPs are:

- All holders of EPLs must prepare a PIRMP (s.153A, POEO Act).
- The PIRMP must include the information detailed in the POEO Act (s.153C) and be in the form required by the POEO General Regulation (cl.98B).
- EPL holders must keep the PIRMP at the premises to which the EPL relates. In the case of transporters of trackable waste and operators of mobile plant, the PIRMP must be kept at the location where the relevant activity is taking place (s.153D, POEO Act).
- Holders of EPLs must test the PIRMP in accordance with the POEO General Regulation (cl.98E).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the EPL holder must immediately implement the plan (s.153F, POEO Act).

New offences have been created, for individuals and corporations, for not complying with the requirements to prepare, keep, test and implement the PIRMP.

Obligations and transitional period for complying with requirements

The new provisions relating to PIRMPs commenced on 29 February 2012.

Holders of an existing EPL issued on or before 29 February 2012 were required to prepare and implement a pollution incident response management plan by 1 September 2012. Holders of licences issued after 29 February 2012 are required to have a plan in place prior to commencing operations.

Focus of the audit program

The focus of the audit program was to assess the level of licensees' compliance with the requirements of Part 5.7A of the POEO Act and Part 3A of the POEO (General) Regulation relating to the preparation, keeping, testing and implementation of PIRMPs.

The objectives of the compliance audits were to:

- determine whether licensees had prepared PIRMPs as required by the POEO Act and Regulation.
- determine the extent to which the PIRMPs prepared complied with the requirements of the POEO Act and Regulation.
- provide information to inform the review of the EPA's guidance document: *Environmental guidelines: Preparation of pollution incident response management plans*, to ensure that this document is a valuable resource to licensees by helping them understand the requirements of the POEO Act and Regulation that relate to PIRMPs and help them achieve a high level of compliance with those requirements.

Audit scope

The scope of the audits was limited to an examination of each licensee's PIRMP in relation to the activities carried out at the licensee's premises. The temporal scope adopted for the assessment of compliance was the day of the audit inspection.

Audit criteria

The audit criteria (the requirements against which the auditor compares collected audit evidence) were:

- Chapter 5, Part 5.7A of the *Protection of the Environment Operations Act 1997* and
- Chapter 7, Part 3A of the *Protection of the Environment Operations (General) 2009*.

These chapters can be accessed at www.epa.nsw.gov.au/legislation/index.htm

Premises audited

A total of thirty premises licensed by the EPA under the POEO Act were audited by the EPA.

The premises selected included those premises where one or more of the following scheduled activities were being carried out:

- wood or timber milling preservation or processing
- agricultural processing
- paper or pulp production
- chemical production and storage
- extractive activities
- railway systems activities
- waste disposal (thermal treatment)
- waste processing (non-thermal treatment)

- sewage treatment
- resource recovery
- ceramic works
- metallurgical activities
- mining for coal
- crushing, grinding or separating.

Note: Only premise-based activities were selected for audit. No mobile based operations were selected. See Appendix A for a full list of the audited premises.

Audit methodology

In carrying out the compliance audits, EPA auditors followed the procedures and protocols in the EPA's *Compliance Audit Handbook* (www.epa.nsw.gov.au/resources/licensing/cahandbook0613.pdf).

Notification letters were sent to all licensees prior to the commencement of the audit program, advising that as of 1 September 2012, all licensees would be required to ensure they had prepared and implemented a PIRMP. The notification letter also advised that the EPA would be undertaking compliance activities in relation to the requirements regarding PIRMPs.

Audit inspections were carried out between October 2012 and January 2013.

A list of audited premises including the name of the licence holder and licence number can be found at Appendix A.

The audits involved assessing each audited licensee's compliance with the audit criteria. The audits were limited to an examination of each licensee's PIRMP in relation to the activities carried out at the licensee's premises. Audit evidence was collected during discussions with site personnel, examination of documentation provided by the licensee, together with observations made during the audit inspection.

The audit findings were then presented to the licensee in a draft compliance audit report. The reports contain recommended actions to correct any non-compliance identified, and timeframes for licensees to achieve compliance. Each licensee was provided with an opportunity to comment on the findings presented in the draft report. Any comments provided by the licensee were considered by the EPA in finalising the compliance audit report.

Final compliance audit reports are available on the EPA's Public Register at www.epa.nsw.gov.au/prpoeoapp/

Importance of addressing all non-compliances

Given the importance of PIRMP requirements in ensuring that the risks associated with pollution incidents can be affectively managed, minimized, responded to and communicated, the EPA considers that all non-compliances identified should be addressed as a matter of priority.

The EPA has followed up on the recommended actions to ensure that the licensees have implemented the actions within the agreed timeframes outlined in each report. A systematic and rigorous monitoring program that tracks these follow-ups is being used to ensure that each audited premise completes all the required actions.

This report is a collation of the findings presented in the individual compliance audit reports presented to the licensees.

Audit findings

This section of the report collates and summaries the various issues identified and reported in the individual compliance audits undertaken by the EPA.

All 30 licensed premises audited were found to have prepared a Pollution Incident Response Management Plan

Out of these thirty licensed premises:

- twenty-two were found to have prepared a stand-alone PIRMP
- eight had plans which formed part of another document (e.g. Emergency Management Plan, Emergency Response Plan or Emergency Procedures documents) required to be prepared under or in accordance with other legislation.

General findings

Twenty-two licensees were found to have complied with over 80 per cent of the audited requirements. Of those fifteen licensees complied with 90 per cent of the audited requirements. One licensee was found to be compliant with all the audited requirements.

All licensees fully complied with the requirements to have the following information included in their plans;

- a description of the hazards to human health or the environment,
- a description of the actions that are to be taken immediately after a pollution incident occurs to reduce or control pollution,
- the arrangements that are in place to minimise the risk of harm to any persons on site,
- the manner in which plans are to be tested and maintained.

Summary of audit findings

This section summarises the audit findings.

Procedures for notifying a pollution incident (s.153C (a) of the POEO Act)

Twenty-five of the thirty plans included procedures for notifying a pollution incident to all the necessary parties including: owners and occupiers of premises in the vicinity of the premises, the local authority, any area affected or potentially affected, by the pollution, and any other persons or authorities required to be notified. Five plans did not include procedures to notify one or more of these parties. In some instances, procedures to notify a particular party were not included as the licence holder had not identified a party as needing to be notified. It is important that PIRMPs include the procedures to be followed in notifying a pollution incident to premises in the vicinity and to the relevant authorities, so that communication with all necessary parties occurs in a timely manner to minimise the impact of a pollution incident on the environment and human health.

***25/30 licensees complied
5/30 licensees did not comply***

Details of key individuals (s.98C(1)(g) of the POEO General Regulation)

Twenty-five of the thirty PIRMPs included the details of key individuals who are responsible for managing pollution incidents. Plans must include the names, positions and 24-hour contact details of key individuals who are responsible for activating the plans, notifying the relevant authorities, and individuals who have responsibilities for managing the response to a pollution incident. It is important that these people can be contacted promptly so that the appropriate response to a pollution incident can be undertaken in a timely manner.

***25/30 licensees complied
5/30 licensees did not comply***

Contact details of relevant authorities (cl.98C(1)(h) of the POEO General Regulation)

PIRMPs must include the contact details of the appropriate regulatory authority including the EPA or the local council (as applicable), the Ministry of Health, WorkCover NSW, and Fire and Rescue NSW. Twenty-five of the thirty plans contained contact details for all relevant authorities. One plan did not include any contact details of the relevant authorities. The remaining four plans included details of some relevant authorities but not all. It is important that the PIRMP includes the contact details for all relevant authorities. This will help ensure that relevant authorities are informed of a pollution incident in a timely manner, so follow-up actions can be coordinated to minimise harm to the environment and human health.

***25/30 licensees complied
4/30 licensees complied in part
1/30 licensees did not comply***

Communicating with neighbours and the local community – mechanisms for providing early warnings and updates to premises in the vicinity (cl.98C(1)(i) of the POEO General Regulation)

Communicating with neighbours and the local community is essential when managing the response to a pollution incident. Twenty-one of the thirty plans included mechanisms for providing early warnings and updates to premises in the vicinity. PIRMPs must include the mechanisms that will be used to provide early warnings and regular updates to the owners and occupiers of premises who may be affected by a pollution incident occurring on the premises.

***21/30 licensees complied
9/30 licensees did not comply***

Maximum quantity of potential pollutants (cl.98C(1)(d) and (e) of the POEO General Regulation)

PIRMPs must include the maximum quantity of potential pollutants likely to be stored or held at or on the premises. Twenty-two of the thirty plans included the maximum quantity of potential pollutants. It is important that this information is readily available to site staff and emergency services personnel who may be involved in responding to a pollution incident at the premises. The availability of such information helps staff and emergency services personnel understand the potential scale and likely impact of a pollution incident and also helps inform decision making in relation to the response to the incident.

***22/30 licensees complied
8/30 licensees did not comply***

Inventory of pollutants (cl.98C(1)(d) and (e) of the POEO General Regulation)

PIRMPs must include an inventory of potential pollutants that are likely to be stored or used at the premises. It is important that PIRMPs include a list of all the potential pollutants that may be stored or held on the premises and the locations where those pollutants are stored. Maintaining an updated inventory of all potential pollutants that may be discharged from the premises in the event of a pollution incident helps ensure that information can be made available to the emergency services personnel when responding to a pollution incident. Fourteen plans included an inventory of all potential pollutants that were identified by the licensees as being used or stored on the premises. A further fourteen PIRMPs listed as potential pollutants only hazardous chemicals and dangerous goods that are stored or used on the premises. It is important that the inventory of potential pollutants include pollutants likely to be contained in contaminated stormwater, contaminated wastes, dust from stockpiles, etc. Two plans did not include an inventory of potential pollutants.

***14/30 licensees complied fully
14/30 complied in part
2/30 licensees did not comply***

Making certain information publicly available (cl.98D of the POEO General Regulation)

Licensees are required to place certain information from their plan on a publicly accessible website. The information that licensees are required to place on a publicly accessible website includes the procedures that the licensee will follow when notifying the owners and occupiers of premises who may be affected by an incident occurring on the premises, the names of relevant authorities and their contact details. This provides the community with some assurance that the licensee has procedures in place for notifying the community and appropriate agencies of incidents that may cause an impact on the environment. Twenty-eight of the licensees audited had web sites. Of these, twenty licensees had published PIRMP information on their web site. Seven of the twenty licensees that published PIRMP information did not publish all of the required information. Eight licensees did not publish any PIRMP information on their web sites.

***13/28 licensees that have web sites complied
7/28 licensees that have web sites complied in part
8/28 licensees that have web sites did not comply***

Maps (cl.98 C(1)(k) of the POEO General Regulation)

PIRMPs must include a detailed map (or set of maps) showing the location of the premises, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises, and the locations of any stormwater drains on the premises.

These maps are considered to be important operational and emergency management tools and are essential in helping to ensure proper emergency planning and response. During a pollution incident, accurate maps serve as an effective method for locating all potential sources of risks, including the area likely to be impacted by a pollution incident. Maps also serve as a valuable tool for emergency managers to assist in determining the most appropriate course of action to take, in order to minimise environmental impact in the event of a pollution incident. While most plans audited included some maps, they did not contain all the details required to be included in such maps.

Of the thirty plans audited, seven included maps showing all the required details, twenty included maps showing some of the required details, and three did not include any maps.

Of the twenty plans that included some of the required details, the following issues were identified:

- Twelve did not include the surrounding area likely to be affected by a pollution incident.
- Three did not have maps showing the location of potential pollutants.
- Fifteen did not include maps showing the location of any stormwater drains on the premises.
- Nine did not include a map showing the location of the premises

***7/30 licensees complied fully
20/30 licensees complied in part
3/30 licensees did not comply***

After the audit

Follow-up by the EPA

A follow-up by the EPA has confirmed that the issues identified during the compliance audits have been addressed.

The majority of licensees promptly addressed the non-compliances when presented with the draft compliance audit report for their premise. In their response to the EPA in relation to the draft audit findings some licensees provided an updated copy of their PIRMP to demonstrate that the PIRMP had been updated to include all the required details.

The EPA will continue to monitor licensees' compliance with the requirements of the POEO Act and POEO (General) Regulation as they relate to PIRMPs.

Related initiatives

Pollution incident notification requirements

The [Protection of the Environment Legislation Amendment Act 2011](#) introduced several changes to the *Protection of the Environment Operations Act 1997* (POEO Act) designed to improve the way pollution incidents are reported and managed. The changes apply to:

- all holders of an environment protection licence (licensees) under the POEO Act
- appropriate persons that undertake activities resulting in a pollution incident.

These changes commenced on 6 February 2012.

What are the changes to the POEO Act?

The changes are to:

- make the duty to notify of a pollution incident *immediately* (instead of *as soon as practicable*, as was previously the case under s.148 of the POEO Act). The term *immediate* is taken to mean that the pollution incidents must be reported promptly and without delay. This will help ensure that the appropriate agencies have the information they need to respond within an appropriate time.
- notify all relevant authorities, and not just the appropriate regulatory authority (ARA) under the POEO Act. All relevant authorities comprise: the ARA, the Environment Protection Authority (EPA) if they are not the ARA, the Ministry of Health, the WorkCover Authority, the local authority such as the local council if they are not the ARA and Fire and Rescue NSW.
- the maximum penalty for failure to notify of a pollution incident in accordance with the requirements of the POEO Act, which has doubled from \$1 million to \$2 million.
- allow the EPA to formally direct a person who is the occupier of a premises where a pollution incident has occurred to notify such other persons of the incident as the EPA thinks necessary.

A pollution incident is required to be notified if there is a risk of material harm to the environment. Material harm is defined in s.147 of the POEO Act as:

(a) *harm to the environment is material if:*

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

These strengthened provisions will help ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information that is required to manage in a timely manner.

(For more information, see the Protocol for industry notification of pollution incidents at www.epa.nsw.gov.au/pollution/notificationprotocol.htm and the frequently asked questions at www.epa.nsw.gov.au/legislation/poefaqnotify.htm.)

PIRMP requirements for trackable waste transporters

The requirements to prepare, keep, test and implement a PIRMP also apply to trackable waste transporters licensed by the EPA. These requirements also commenced on 29 February 2012 with PIRMPs required to be in place within 6 months, i.e. by 1 September 2012.

A PIRMP is available for trackable waste transporters (www.epa.nsw.gov.au/legislation/trackwastetrans.htm). Further information on the requirements as they relate to trackable waste transporters is available (www.epa.nsw.gov.au/legislation/poefagspirmmps.htm).

Ongoing compliance and enforcement activities

The EPA will continue to pro-actively monitor compliance by environment protection licence holders with the requirements to prepare, keep, test and implement a PIRMP. This will be undertaken using a range of mechanisms, including site inspections, targeted compliance audits and campaigns, and investigation of complaints and incidents.

In addition, all licensees must report annually to the EPA on their level of compliance with licence conditions, including details of their compliance with the requirements to prepare, implement and test their PIRMPs.

Appendix A Premises audited in this audit program

Individual compliance audit reports for these facilities are publicly available on the EPA's Public Register at: www.epa.nsw.gov.au/prpoeoapp/.

Scheduled activity	Licence number	Accountable party (Licensee)
Agricultural processing	883	Shoalhaven Starches Pty Ltd
Ceramic works	2692	CSR Viridian Limited
Chemical production	11164	BOC Limited
Chemical production	2491	Chemprod Nominees Proprietary Limited
Chemical production	11640	Howard & Sons Pyrotechnics (Australia) Pty Ltd
Chemical storage	660	The Shell Company of Australia Limited
Chemical storage	1969	Sydney Metropolitan Pipeline Pty Ltd
Crushing, grinding or separating	2688	Perilya Broken Hill Limited
Crushing, grinding or separating	12559	Broken Hill Operations Pty Ltd
Extractive activities	11701	Duralie Coal Pty Ltd
Extractive activities	1698	Boral Cement Ltd
Metallurgical activities	1098	Crane Enfield Metals Pty. Limited
Metallurgical activities	6934	Sims Group Australia Holdings Limited
Mining	12290	Werris Creek Coal Pty Limited
Mining for coal	12040	Gujarat Nre Coking Coal Limited
Paper or pulp production	1272	Norske Skog Paper Mills (Australia) Limited
Railway systems activities	3142	Australian Rail Track Corporation Limited
Resource recovery	4995	J.R. & E.G. Richards (N.S.W.) Pty Ltd
Sewage treatment	3850	Dubbo City Council
Sewage treatment (large plant)	1728	Sydney Water Corporation
Sewage treatment (small plant)	573	Coffs Harbour City Council
Waste disposal (application to land)	11436	Veolia Environmental Services (Australia) Pty Ltd
Waste disposal (application to land)	4669	Scott Robert Greenwood
Waste disposal (thermal treatment)	4848	Thales Australia Limited
Waste processing (non-thermal treatment)	4560	Transpacific Industries Pty. Ltd.
Wood or timber milling or processing	821	Duncan's Holdings Ltd
Wood or timber milling or processing	3035	Borg Panels Pty Limited
Wood or timber milling or processing	11566	Carter Holt Harvey Wood Products Australia Pty Limited
Wood preservation	11413	Coffs Harbour Hardwoods (Trading) Pty Ltd
Wood preservation, processing	12091	McVicar Timber Group Limited