

Pollution Incident Response Management Plan McDonald's Hexham Sewage Treatment System



1. Purpose

This Pollution Incident Response Management Plan (PIRMP) has been prepared pursuant to Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) in respect of the licenced premises at Hexham operated by McDonald's Australia Limited (**McDonald's**).

Part 5.7A of the POEO Act requires McDonald's as the holder of an Environment Protection Licence (**Licence**) to prepare, keep, test and implement a pollution incident response management plan. This PIRMP has been prepared specifically for the following Licence at McDonald's Hexham:

Licence Number:	329
Licence Holder:	McDonald's Australia Limited ABN 43 008 496 928
Premises:	McDonald's Hexham, 23 Maitland Road, Hexham NSW 2322
Licensed Activity:	Sewage Treatment Systems

McDonald's is aware that the POEO Act requires this PIRMP to be:

- tested routinely at least once every 12 months, and within 1 month of any pollution incident occurring; and
- immediately implemented if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened.

2. Definitions

The definition of a pollution incident pursuant to the POEO Act 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.”*

Pursuant to s148 of the POEO Act, McDonald's is required to notify each relevant authority of a pollution incident immediately after becoming aware of the incident, if '**material harm to the environment**' as defined in section 147 of the POEO Act is caused or threatened:

- 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.*

Further definitions are as follows:

*“**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).”*

*“**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 (a)–(c).”

*“**Environment Management System (EMS)** means a part of the McDonald’s management system that is used to develop and implement the Environment Policy and manage the Environmental Aspects of its operations.”*

*“**Environment Policy** means the document in which senior management formally expresses the overall intentions and direction of McDonald’s related to its environmental performance.*

*“**Environmental Aspects** means elements of McDonald’s operations that can interact with the environment.”*

*“**EPA** means the Environment Protection Authority constituted by the Protection of the Environment Administration Act 1991.”*

*“**Pollution** means:*

(a) water pollution, or (b) air pollution, or (c) noise pollution, or (d) land pollution.

*“**Premise** includes:*

(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.”

3. Notification Protocol

Under Section 148 of the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- The person carrying on the activity;
- An employee or agent carrying on the activity;
- An employer carrying on the activity; and/or
- The occupier of the premises where the incident occurs.

If a pollution incident occurs which causes or threatens material harm to the environment, the incident must be immediately reported to each relevant authority as described below.

Notification must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident.

If a pollution incident occurs, and it presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance (phone 000). The other response agencies must still be contacted after that to satisfy notification obligations.

If the incident does not require an initial combat agency, or once the 000 call has been made, the following relevant authorities must be immediately notified (see contact details in section 9):

1. Environment Protection Authority;
2. The Ministry of Health via the local Public Health Unit;

3. Fire and Rescue NSW;
4. WorkCover Authority; and
5. Newcastle City Council.

5. Description and likelihood of hazards

The main hazards to human health and the environment associated with the Sewage Treatment System located at the Hexham McDonald's are in relation to risk of exposure to the following:

- Treated human/restaurant waste (effluent);
- Partially treated human/restaurant waste;
- Untreated human/restaurant waste;
- Contact with/discharge of chemicals on site;
 - Sodium Thiosulfite
 - Trichloroisocyanuric Acid (Chlorine).

There is also the potential for the above pollutants to be discharged into the Hunter River environment, either upstream or downstream, depending on tidal conditions.

The likelihood of exposure or risk of these hazards occurring is considered minimal.

Circumstances or events that could increase the likelihood of these hazards occurring include, but are not limited to:

- Electrical Storm activity;
- Planned/Unplanned power interruptions;
- Periods of high rainfall activity; and
- Changes to stormwater drainage on-site that could intrude on the wastewater system.

6. Pre-emptive actions to be taken

McDonald's has engaged Earthsafe to undertake pre-emptive actions in respect of the sewage treatment system to minimise or prevent any risk of harm to human health or the environment. These pre-emptive actions include:

- weekly, monthly and quarterly service calls;
- early warning electronic alarm systems; and
- the provision for 'back-to-base' monitoring and control systems.

Additionally, reserve capacity is contained within the design of the sewage treatment system which provides a spill- containment factor.

Other pre-emptive actions taken to minimise the likelihood of potential environmental hazards include:

- Provision and use of spill kits;
- Ongoing facility maintenance schedule; and
- Onsite inductions for employees, contractors and suppliers.

7. Inventory of Pollutants

The potential pollutants kept on the premises are as follows:

- Wastewater in the treatment system
- Liquid Chlorine
 - Maximum Volume of 100L on site. This is diluted in a 1 to 5 ratio, and is dosed into the effluent to disinfect it before disposal.
 - The solution is kept in a black polyethylene drum with dosing pump within spill containment.
- Sodium Thiosulfite
 - Maximum Volume of 100L on site. This is diluted to a 1 in 5 ratio, and is dosed into the effluent to disinfect it before disposal.
 - The solution is kept in a black polyethylene drum with dosing pump within spill containment.

Refer to the map in section 12 for identification of the storage locations of these potential pollutants.

8. Safety equipment

Personal Protection Equipment (PPE) requirements are in place for all McDonald's employees and contractors who work within the onsite Sewage Treatment System.

Safety Equipment includes

- Gloves;
- First aid kits;
- Appropriate signage; and
- Fire Extinguishers.

Other onsite safety-related equipment includes:

- Spill kits;
- Material Safety Data Sheet (MSDS) Register;
- Appropriate process and chemical identification signage; and
- Restricted chemical access.

9. Contact details

If, under application of internal incident classification procedures and pursuant to the POEO Act, a pollution incident is determined to have caused or threatened material harm to the environment at the McDonald's Hexham site, the following internal and external stakeholders must be contacted immediately, in alignment with internal notification and escalation procedures (see table 9.1 below).

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order:

- the EPA and Newcastle City Council
- the Ministry of Health via the local Public Health Unit
- the WorkCover Authority
- Fire and Rescue NSW.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.

Table 9.1: Summary of incident management contact details

Organisation	Name	24 hour contact Number	Other
Earthsafe (Service) Pty Ltd	Owen Hill Managing Director	1800 043 635	Primarily responsible for activating the plan and managing the response
McDonald's Australia Limited	Brad McMullen Sustainability Manager	██████████	Responsible for, and authorised to, notifying relevant authorities
Environment Protection Authority	Pollution Line	131 555	Notify in the event of material harm
Newcastle City Council	Environmental Health Officer	(02) 4974 2000	Notify in the event of material harm
NSW Ministry of Health	Public Health Officer	(02) 4924 6477	Newcastle Office (diverts to John Hunter Hospital). Notify in the event of material harm
WorkCover NSW	Work cover officer	131 050	Notify in the event of material harm
Fire and Rescue NSW	N/A	000 / 1300 729 579	Notify in the event of material harm

Neighbouring Properties - To be notified in the event of material harm.



[REDACTED]

Note the names, addresses and phone numbers of surrounding private residences have been withheld from public viewing for privacy reasons. These details however are kept on the McDonald's and Earthsafe systems as required under this PIRMP.

10. Communication with neighbours and the local community

The mechanisms to be employed by McDonald's and Earthsafe for providing early warnings and regular updates to owners/occupiers of premises which may be affected by an incident are:

The most effective form of communicating any early warnings or updates would be the McDonald's website, and official media and press releases, along with any updates passed along to the RMS service, to advise people to avoid recreational activities in the Hunter River.

Important information can include ensuring minimal activities in the Hunter River located up or downstream from the discharge location, avoiding the area around the spillage on the McDonald's site, or closing the store and advising the public.

In response to the introduction of changes to 5.7 of the POEO Act, and as part of this regularly updating this PIRMP, McDonald's will formally contact properties in close proximity to the site's operational boundary, with a request for the provision of the most appropriate contact details, to be included under this plan.

In the event of a notifiable pollution incident, and dependent upon nature and scale, immediate neighbouring properties will be contacted via the provided details, under the direction of Emergency Services with immediate response information.

Contact details for McDonald's Hexham are publically available via local directories and signage in store.

11. Minimising harm to persons on the premises

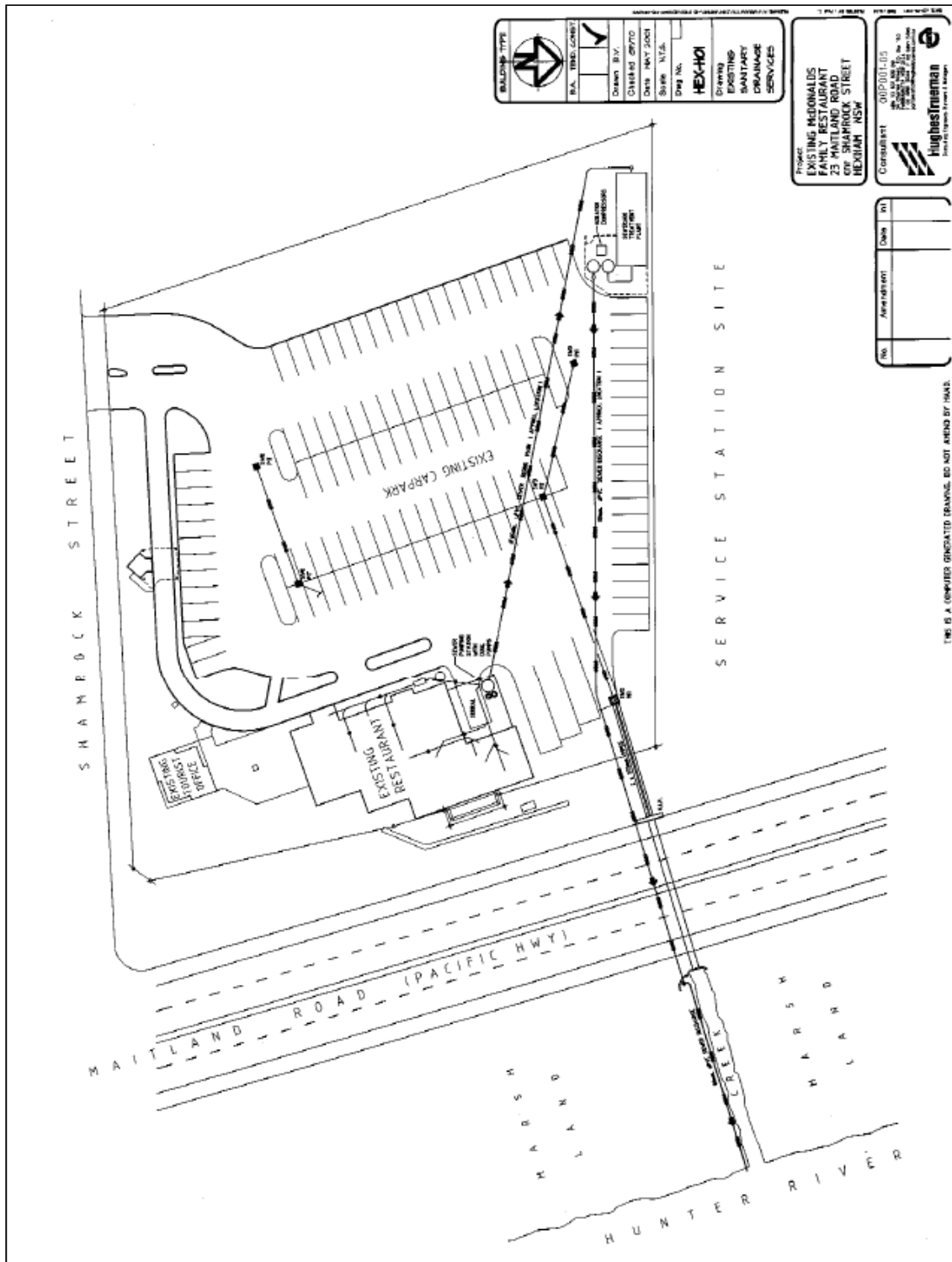
Any persons on the premises or involved in the incident response will be required to follow the instruction of lead emergency response teams and Earthsafe personnel.

Prior to the arrival of these response teams the standard McDonald's operation evacuation procedures, muster locations and audible warning (alarm) systems will be utilised to remove occupants and site personnel from the hazards. These procedures should be followed unless for some unforeseen reason they place site occupants directly in harm's way.

In the event of a large leak, spill or release McDonalds may choose to gain external expert advice for toxicology and environmental impacts.

12. Maps

The plan attached indicates the locations of the onsite stormwater drains, the location of the sewage treatment plant and the drain and discharge creek that are likely to be affected by a pollution event.



13. Actions to be taken during or immediately after a pollution incident

Depending on the size of the spill, as well as the pollutant type, certain responses are necessary.

For chemical spills:

Small spills are made safe, contained, and cleaned as dictated in the most recent MSDS. Large spills are reported to the relevant Authorities (000, Hazmat, EPA etc).

For wastewater incidents:

The incident should be rectified with the removal of excess liquid by Vacuum Truck, replacement of faulty parts causing the problem, and overflow areas cleaned with spill kits or lime, depending on the size of the incident.

14. Staff training

All Earthsafe staff attending Hexham McDonald's are informed of all procedures and operation of the sewage treatment system and this PIRMP by senior Earthsafe personnel, and monthly toolbox talks/safety meetings are held, with minor weekly toolbox talks. Simulated excessive chemical discharge exercises are carried out on an annual basis so all staff remain up to date with the latest response procedures.

Earthsafe maintain records of toolbox talks, safety meetings, training and simulation exercises within a database system kept at the Earthsafe Office at Unit 2/6 Paddock Place, Rutherford NSW.

15. Availability

In accordance with our obligations under the POEO Act, a copy of this PIRMP is held at the following locations and can be provided upon request:

1. Earthsafe (Service) Pty Ltd offices at Unit 2/6 Paddock Place, Rutherford NSW 2320;
2. Manager's Office at McDonald's Hexham, 23 Maitland Road, Hexham NSW 2322; and
3. www.mcdonald's.com.au/about-us/responsibility.

16. Annual Testing

This PIRMP is routinely tested on an annual basis with the objective of ensuring that every employee is able to respond to any potential pollution incident. The annual test consists of a practical simulation of all likely scenarios in relation to the hazards associated with the license on site, including but not limited to chemical spills, wastewater spills power failures.

The plan will also be tested by McDonald's and Earthsafe within one month of any pollution incident occurring. This will provide an assessment, in the light of that incident, whether the information included in the plan is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

17. Implementing the PIRMP

If a pollution incident occurs in the course of an activity at the premises so that material harm to the environment (within the meaning of section 147) is caused or threatened, McDonald's must immediately implement this PIRMP.