

Pollution Prevention Plan (*Template*) for (*Company Name*)

Plan for managing land and water pollution risks

**Site/Process to which this PPP
applies** _____

Date _____

Version No.: <i>insert version no./code</i> Revision date: <i>insert date</i>
Prepared by: <i>insert author(s)</i> Position: <i>insert author(s) job position</i>
Approved by: <i>insert approver</i> Position: <i>insert approve job position</i>
Approvers signature: Date:
COPY No.: <i>insert e.g. 2 of 4</i> HELD BY: <i>insert staff/contractor name and position</i>

UPDATES: Check for updates before using this PPP as it must be reviewed and updated at least every three years to ensure it continually improves and remains up-to-date in terms of the NRMP and Stormwater Bylaw provisions.

Document Control Statement:

To ensure this Pollution Prevention Plan (PPP) is kept up-to-date and that the most recent version is used by staff and contractors, its distribution and revision will be controlled. The *job title of person responsible (Person's name)* will:

- manage the master copy and any other paper or electronic copies of the PPP
- keep a summary of updates, versions and dates and distribution lists
- ensure PPP updates are distributed to all relevant staff as controlled copies
- ensure any uncontrolled copies are marked as uncontrolled copies
- ensure any out-of-date copies are clearly marked as such when updates are distributed

Refer to the Introduction section of the PPP Guide for further instructions on how to use the PPP Template. Explanatory notes are highlighted grey and prompts to insert site specific information and in italics. Grey highlighted text can be deleted once the relevant information is inserted into the template. To remove the grey highlighting, find the 'text highlight' button on your toolbar in MSWord (for more information search 'text highlighting' in the MS Word Help menu by pressing F1). Turn on formatting marks in MS Word (Ctrl + *) to show where section breaks are and take care not to delete section breaks in this document. Double click on the header text to change 'CompanyName' – double click back on the paragraph text when finished.

This 'PPP Template (Version 3 2008)' is part of Nelson City Council's information to assist industries in meeting the requirement of the Stormwater Bylaw 2006 and Freshwater Plan. The document is complemented by the 'Guide to developing a Pollution Prevention Plan' (Version 3 2008). A PPP is a legal requirement for some industrial or trade operations in the Nelson region. If you have not received the other supporting documents (i.e. the PPP Template, Checklist, Stormwater Bylaw 2006) contact Nelson City Council (Manager Infrastructural Assets, Michael Schruer. Phone 546 0309 or email michael.schrueer@ncc.govt.nz). Note that these NCC documents will be updated to reflect requirements and feedback obtained from businesses. Please forward your comments to .

NOTE TO USER:

- The amount of information you need to provide in this document will vary significantly depending on the size and complexity of your business.
- For small and simple businesses, some of the sections may be irrelevant or require minimal information.
- For larger and more complex businesses you will likely require specialist input.
- If in doubt, call NCC for advice and/or send your partially completed Prevention Pollution Plan in for feedback on what other information you need to supply.

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1. Company details and where this plan applies

1.1 Company description and site location

Briefly describe your company and details of the location (see Section 1.1 of the PPP Guide).

Site Address:

Legal Description:

Company Operations:

Staff Numbers:

Environmental Policy

If your company has or develops an Environmental Policy, summarise it here and/or include it in Attachment A.

1.2 Scope of this PPP

Describe below what aspects of your business this PPP covers (see Section 1.2 of the PPP Guide)

NCC requirements for 'high risk industries'

Company name has developed this Pollution Prevention Plan to assist with compliance with NCC's Stormwater Bylaw 2006 provisions. The operation is listed as a high risk activity under 'Schedule 1 – High Risk Industrial or Trade Processes' of the Stormwater Bylaw.

The following aspects of our business operation are covered by this PPP:

- ...
- ...

The following aspects of our business operation are not covered by this PPP:

- ...
- ...

1.3 Site activities, facilities and stores

Briefly outline your site's activities, facilities and stores (see Section 1.3 page 5 of the PPP Guide).

List all materials, equipment and processes used on site that could possibly contribute to pollution.

(This will help to identify all your actual and potential sources of pollution in Section 2.1 below).

Section 1.3 of the PPP Guide describes Common Stormwater Contaminants.

Attach any maps or plans in Attachment A to your PPP

1.4 Site layout and drainage plan(s)

Briefly describe the general layout of your site and drainage here.

Attach a copy of your Site Layout and Drainage plan(s) in Attachment A. Refer to Section 1.4 on page 5 of the PPP Guide to see what needs to be shown.

Use the Checklist on Page 23 of the PPP Guide if it helps to identify any drainage issues on your site.

Keep a copy of your plan(s), checklist and any notes regarding issues that need fixing to help with the Part 2 'Your Pollution Risks and Controls' Sections.

1.5 Site receiving environments – Where does your stormwater discharge to?

Insert information about your site's receiving environments (see Section 1.5 on page 7 of the PPP Guide).

Attach any supporting maps, photos or plans in Attachment B to your PPP.

You will also use this information later on to help you with the Sections in Part 2

1.6 Site Authorisations, consents and permits

Outline the authorisations, consents and permits that your site has or requires in order to manage pollution risks (see Section 1.6 on page 7 of the PPP Guide). Complete Table 1 below if it helps you to summarise this information.

You will use this information later on to help you with the Sections in Part 2

Table 1: Summary of authorisations, consents and permits (refer section 1.6 above)

Type and number	Status	Summary of key conditions and monitoring required
<i>Tradewaste discharge permit – No. XYZ</i>	<i>Granted (expires 2012)</i>	<i>Relates to discharge from factory and wastewater treatment bund – Discharge Xm3/s (continual monitoring) pH maximum 8 (daily monitoring, mid-flow)</i>

2. Site Assessment – Pollution Risks and Controls

Complete Table 2 (below) to identify your sources of pollution and how these currently are or will be, controlled on site.

As well as completing Table 2, insert copies/plans/design details of structural controls in Attachment D and a copy of all the written procedural controls in Attachment E of this document.

2.1 Identify your Pollution Risks arising from your Actual and Potential Sources of Pollution

In Table 2 list details of actual and potential sources of pollution that pose risks for your site (refer to Sections 2.1 to 2.4 on pages 9-11 of the PPP Guide). Section 1.3 of the PPP Guide describes Common Stormwater Contaminants. See Table 2a on page 13 of the PPP Guide for examples of how to complete the Table.

It may be more practical to split your site into areas or deal with different aspects of your operation, so use a separate copy of Table 2.1 for each area / aspect if you wish.

For each risk identified, put the contaminant(s) of concern in the adjacent column.

In assessing your site use the checklists on pages 22-23 of the PPP Guide if they help.

Include all risks regardless of whether controls are in place or not.

2.2 Identify your Existing Pollution Controls (Structural and Procedural)

In Table 2 list your existing structural and procedural controls for each risk (i.e. 'Existing pollution controls' columns of Table 2). Refer to section 2.2 of the PPP Guide, pages 9-10.

Note: if your company has details of existing controls in documents such as operating manuals, you can list the ones that relate to pollution risks in your PPP and attach copies of them (if there are too many to include, attach the key sections or documents).

Note: Details and copies of the pollution controls should be recorded in Table 2 and any additional information can be included in Attachments D&E.

Spill Prevention

In Table 2 in your procedural controls, include details of the procedures your company has to prevent spills from occurring. See Section 2.2 in the PPP Guide and use the checklist on Page 23 of the PPP Guide if it helps.

Emergency Spill Response Plan

An Emergency Spill Response Plan (ESRP) is a key pollution control method of Hazardous Substances. Insert a cross reference to your ESRP in Table 2 to the documents and insert the ESRP documents in Attachment F.

2.3 Identify Best Practicable Options for new or improved pollution controls

In Table 2 assess the existing pollution controls you have listed in Table 2 to determine whether they are sufficient to achieve legal compliance and put a 'Yes' or 'No' in the 'Comply?' column of Table 2. (Refer to the Stormwater Bylaw and FWr 22 for what is permissible in stormwater discharge).

For every 'No' (i.e. where compliance isn't being achieved) you will need to identify practical option(s) and solutions to mitigate these risks. Include details of what solution is needed to achieve compliance (either an improvement to an existing control or

development of a new control) and record this in the 'Improved or New Pollution Controls' columns in Table 2.

To achieve compliance you must ensure that the impact of your industry's activities on the environment is minimised as much as is practically achievable. This means you must address each contaminant identified in 2.1 above and make changes to prevent the contaminant from entering the stormwater or treat your stormwater to reduce the contaminant concentrations as much as is practically achievable.

Part 4 of the PPP Guide (page 17) has some suggestions on practical options and solutions to common pollutants. Note that the information provided is a guide only and site specific advice from a suitably qualified and experienced professional is likely to be required to minimise your risk of non-compliance.

Tip: Keep notes of the process you follow and the decisions you make as this information may be useful for prioritising and implementing your actions, and also in the future when you review and update your PPP.

NCC may request information explaining the timeframes for these future actions (including how you determined the 'pollution risk priority' for the actions and the factors that determined the proposed timeframes).

2.4 Address your pollution control actions

Review any new or improved pollution controls that you have identified for your site and indicate timeframes of the actions you will undertake to address your pollution risks (see Section 2.4 of the PPP Guide).

2.5 Assessment of Environmental Effects

Once you have completed Table 2 as directed above, briefly discuss the overall effects your industry will have on the environment once your Pollution Prevention Plan is implemented. Your Pollution Prevention Plan once implemented, should result in a minimal impact of your industry on the environment, i.e. minimal discharge of contaminants.

Table 2: Pollution Risks and Controls (Sections 2.1 -2.4 above and in the PPP Guide)

This table relates to sections 2.1, 2.2, 2.3 and 2.4 above (as noted in superscript numbers). Fill out this table using the guidelines in the text of the corresponding sections of this template and the PPP Guide. Further examples are shown in Table 2a page 12 in the PPP Guide). You may use the below table or create a similar one of your own.

Note: 'Comply' in the following table(s) relates to whether the pollution controls achieve compliance with NCC's Stormwater Bylaw, NRMP and any other relevant legislation. Pollution Risk Priority should reflect the risk of pollution posed by the contaminant(s)

Area of site:

Activity/facility/store:

Actual and Potential Sources of Pollution ^{2.1}		Existing pollution controls ^{2.2}		Comply ?	Improved or new pollution controls required ^{2.3}				Timeframe for Future Actions ^{2.4}		
Pollution Risk	Contaminant (s)	Structural	Procedural	Yes / No	Structural	Procedural	Pollution Risk Priority	Order for Completion	Initiation	Completion	Person Responsible
<i>Carpark runoff to stream</i>	<i>Hydrocarbons, metals, litter, sediment</i>	<i>Asphalted carpark. Stormwater sumps & grates</i>	<i>Pick up litter weekly Sweep up leaves in autumn Clean out sumps every 6 months and dispose of sediments appropriately Check for oily stains, and maintain vehicles to minimise leaks Check for potholes and repair if developed</i>	<i>No</i>	<i>Stormwater filter to remove metals, hydrocarbons, and fine sediments</i>	<i>Inspect device according to manufacturers recommendations (annually) and clean every two years</i>	<i>medium</i>	<i>1</i>	<i>January 2009</i>	<i>December 2009</i>	<i>John Roberts</i>

3. Maintenance, Training and Review

3.1 Inspection and maintenance

Summarise your 'Inspection and maintenance programme' here and attach a copy of the Programme including any supporting forms (e.g. instructions, checklists, forms etc) in Attachment G (see Section 3.1 of the PPP Guide).

3.2 Stormwater management and monitoring

If you have existing or proposed stormwater treatment devices, briefly describe your 'Stormwater management and monitoring programme' here and attach a copy of the Programme including any supporting forms in Attachment H (see Section 3.2 of the PPP Guide).

Note: If you don't have stormwater treatment devices or resource consents conditions with monitoring requirements, state this here and move on to 3.3.

3.3 Training

Outline how you will inform staff of the Pollution Prevention Plan. Attach a copy of your Training Programme in Attachment I (see Section 3.3 of the PPP Guide).

3.4 Record keeping

Briefly describe the records you will keep to ensure and demonstrate your PPP works effectively (see Section 3.4 of the PPP Guide).

3.5 Roles and Responsibilities

Briefly describe the roles and responsibilities you give to staff members to ensure your PPP is implemented effectively (see Section 3.5 of the PPP Guide). Attach any further supporting information in Attachment I.

3.6 PPP Review & Update

Provide details of how you will ensure your PPP is kept up-to-date and continually improved (see Section 3.6 of the PPP Guide). Note: as a minimum PPP's must be reviewed every three years but a more frequent review (e.g. annually or monthly) may be appropriate for some activities particularly if you have lots of 'future actions' to implement in your initial PPP.

Include any forms relating to your PPP review as Attachment J to the PPP Template

ATTACHMENTS

Insert attachments to support your PPP; use the following list as prompts for what to insert (as outlined in the PPP Guide), and then update the heading names to reflect your attachments.

Note: Insert page breaks (Ctrl+Enter) between each of these headings to make header pages for your final PPP.

ATTACHMENT A SITE LAYOUT AND DRAINAGE PLAN(S)

Attach your Site Layout and Drainage plan(s) (see Section 1.3 and page 5 of PPP Guide).

Note: If you have Site Layout and Drainage plan(s) in another location / document, you can insert a legible A4 or A3 copy here and cross-reference to the original for further detail.

ATTACHMENT B RECEIVING ENVIRONMENTS INFORMATION

Attach information about your site's receiving environments (maps, photos, plans) (see Section 1.5 and page 7 of PPP Guide).

ATTACHMENT C AUTHORISATIONS, CONSENTS AND PERMITS

Attach summaries of your site's authorisation, consents and permits (see Section 1.6 and page 7 of PPP Guide).

ATTACHMENT D EXISTING POLLUTION CONTROLS - STRUCTURAL

Attach information regarding your sites structural controls e.g. as-built plans (see Section 2.2 and page 9 of PPP Guide). You can also include (or cross-reference to) any supporting information such as manufacturers specifications.

ATTACHMENT E EXISTING POLLUTION CONTROLS - PROCEDURAL

Attach copies of your procedural controls e.g. 'standard operating procedures' (see Section 2.2 and page 9 of PPP Guide). Your Spill Prevention Plan and Emergency Spill Response Plan are a key procedural controls and should be attached separately.

Note: If you have procedures in other documents (e.g. Operating Manuals) cross-reference to them and insert a copy of key procedures.

ATTACHMENT F SPILL PREVENTION PLAN(S) AND SPILL RESPONSE PLAN(S)

Attach a copy of your Spill Prevention Plan(s) and Emergency Spill Response Plan(s) (see Section 2.2 and page 10 of PPP Guide)

ATTACHMENT G INSPECTION AND MAINTENANCE PROGRAMME

Attach copies of the forms for your Inspection and Maintenance Programme (see Section 3.1 and page 13 of PPP Guide)

ATTACHMENT H STORMWATER MANAGEMENT AND MONITORING PLAN

Attach a copy of your Stormwater Management and Monitoring Programme (see Section 3.2 and page 14 of PPP Guide).

ATTACHMENT I TRAINING PROGRAMME

Attach copies of your 'Training programme' content and forms (see Section 3.3 and page 14 of PPP Guide).

ATTACHMENT J PPP REVIEW

Attach details of the process you will follow to review your PPP (see Section 3.6 and page 16 of PPP Guide).