DOCUMENT CONTROL DETAILS	
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Pollution Incident Response Plan

The following incident plan relates to the Cogent Energy generation plant at 101-103 Miller St, Licence number 12790.
The following plan outlines Cogent energy's procedures for response to pollution incidents, and the testing of these procedures.

Classification

Cogent energy's generation site at 101-103 Miller St, is comprised of two gas fired engines providing onsite electricity for the premises. Licence 12790 is held in relation to the activity of the electrical power generation from gas- Sydney Basin. The activity scale is 0-250 Gwh generated, and this states that the Nitrogen Oxides levels produced from either engine do not exceed 250 milligrams per cubic metre.

Testing

In compliance with the environmental licence 12790, Cogent carries out annual emissions testing on both of the engines at Miller St. The testing date is in March, for an annual reporting period from the 8th of July to the 7th of July, of the following year.
Cogent Energy engages SLR to carry out the emissions testing at the Miller St site. Testing is done by running the engines at 100% load/capacity and the exhaust gas is sampled from the exit point to atmosphere of the exhaust stacks.
The results from the annual emissions testing constitutes the data included in the annual report for the EPA. These results are available to be viewed from the Cogent Energy website, at http://cogentenergy.com.au/governance/
The testing and the annual report are organized and prepared by the Operations department ,whose contact details are as follows.

Cogent Energy, Level 7, 20 Bond St, Sydney 2000

Phone 02 9503 5034
Fax 02 9503 5904

Hazard

The potential Hazard of this plant to the environment is the release of nitrogen oxides, with levels above 250 milligrams per cubic metre. Exceeding these levels however poses no immediate risk to the public or to property in the surrounding area. These are the levels set by the Environment Protection Authority to minimise emissions from industry.
The likelihood of the level exceeding 250 is very low, as the engines are designed to run under this amount while running to the operating specifications.
Along with the twice yearly emissions testing, the levels are also tested during the Engine maintenance services which are carried out twice annually on both engines. Coupled with this is the constant remote monitoring of the site by the Cogent Operations department.
If at any time the engines run outside of the operating specifications, the operation team will be notified via the Cogent Backoffice monitoring and alarm system.
The Operations department will investigate and resolve any issues, and an engine will not be run if it does not meet the operating specifications.

Incident response plan

1. During the twice annual emissions testing of the Miller St site, or the during the servicing of the engines, if the Nitrogen Oxides levels produced by either engine exceed the 250 milligrams per cubic metre, the engine will be not be put back into normal operation until the levels are reduced below the 250 mark. Hence the engine will not operate.
2. A Gas engine Service Technician from the engine manufacturer (MTU) will conduct analysis of the engine to determine the cause and the actions to be taken, to reduce the Nitrogen Oxides level. Using diagnostic software and analysis equipment, to tune the engine back to operating specifications.
3. Once this is done the engine will be retested for emissions to verify compliance with the licence.
4. The EPA will be notified of all the facts in relation to any engine that has failed the testing. The EPA will be provided with the detail of the reasons behind any failure and the work implemented to resolve the issue.

Notification of incident

The following people must be notified of any non compliance to the licence (exceeding the Nitrogen Oxides levels)

1. Mirvac building management, owners of 101-103 Miller St, Greewood Plaza retail complex. Informing the site manager that the Cogent plant has exceeded the maximum Nitrogen Oxides levels and has been shut down until the issue will be resolved.

2. North Sydney Council.
   Postal address : The General Manager, PO Box 12, North Sydney NSW 2059
   Email: council@northsydney.nsw.gov.au
   Ph: 02 9936 8100
3. Environment Protection Authority
   Postal address: Unit Head Sydney Industry, PO Box 668 Parramatta NSW 2150
   Ph: 02 9995 5000, Fax: 02 9995 6900

Testing of response plan

As per the requirements of the incident response plan, the EPA requires the holder to test the response plan on an annual basis. The testing for this site plan will involve confirming that all contact details are correct and current, and that the plan is reviewed to ensure it is up to date in regards to the legislation. A work order is active on the Cogent maintenance system Mex to carry out this review annually, Preventative maintenance No: 158.