

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)



200 Power St.
Glendenning, NSW, 2761

Telephone:
1300 440 072

Version 7 July 2018

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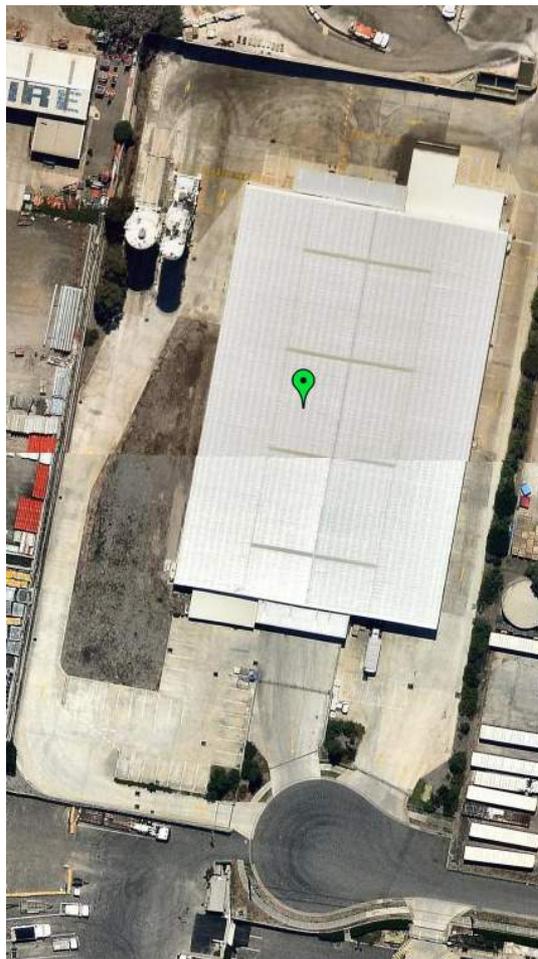
INTRODUCTION

Independent Cement and Lime (ICL) Glendenning depot operates under an EPA license, as such this *plan* is created, maintained and tested in compliance with Part 5.7A of the POEO Act 1997 and Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (POEO General Regulation). This plan shall be reviewed annually.

EPA License Number: 12294. A copy of the license can be found in Appendix 1

License Holder: Independent Cement and Lime

Site Location: 200 Power St, Glendenning - refer aerial shots below.



This *plan* has been prepared for use by Independent Cement and Lime. Environmental issues arising out of ICL operations, and those co-located on site will be covered by this *plan*. This *plan* shall be tested annually, by PIC or delegate.

Definitions

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.

A *pollution incident* has reporting requirements if there is risk of **‘material harm to the environment’** which is defined in section 147 of the Protection of the Environment Operations Act (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 of property damage of an amount, or amounts in aggregate, exceeding \$10,000
- 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.

Plan means a *pollution incident* response management plan required to be prepared under Part 5.7A of the Act.

Contact Details

ICL Glendenning has the capacity to operate 24 hours a day, 7 days a week.

All *pollution incidents* are to be reported to ICL through the following number

1300 440 072

As an EPA licence condition, this number is displayed on the perimeter fencing for environmental incident notifications by members of the public, from both Power St and Belfast Place entry points.

Training Requirements

The PIC and all other employees who have a responsibility for the site will be trained in the contents of this plan, and the appropriate response to an incident that could cause actual or potential material harm to the environment including

- The contents of and how to use the spill kit
- The procedure to be followed after a *pollution incident* and who should be contacted during and after the incident
- The procedure on how to contain a product spill

All training will be recorded in ICL Group’s training register

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Possible Pollution Incidents

The following have been identified as possible *pollution incidents* at the BPS site:

- Truck diesel tank rupture due to collision
- Diesel leak from truck
- Cementitious product into storm water drains
- Failure of silo top
- Dust collector malfunction
- Loading/Unloading issues causing cementitious product release into air

Flora and Fauna that could be affected

There is no known flora and fauna on site that could be affected by the operations.

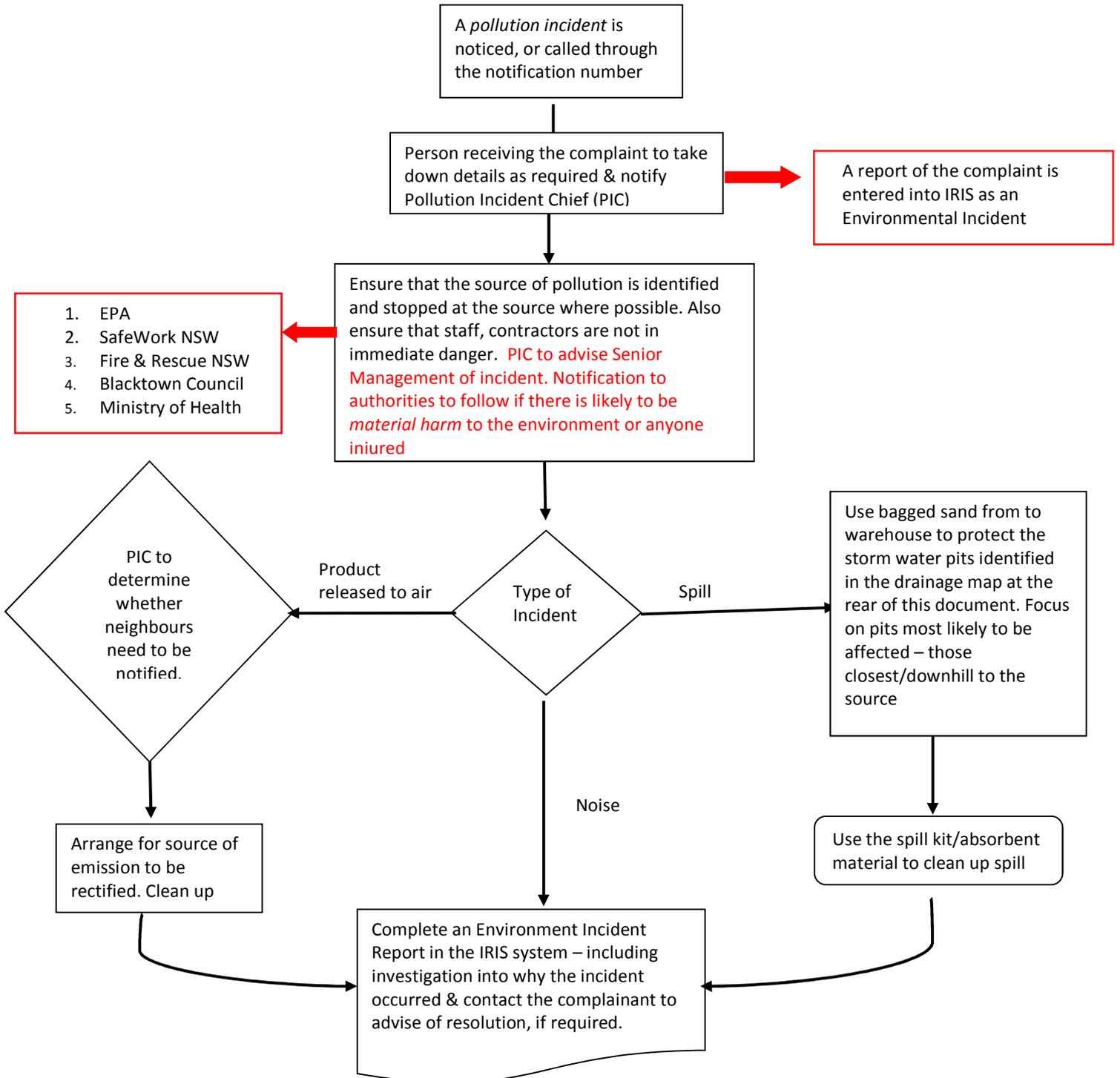
Inventory of Pollutants

Potential pollutant kept on site	Maximum quantity kept on site
Diesel in the truck	200L per truck
Gas Cylinders	10 cylinders @ 15kgs each
Cement (including slag and fly ash) Bulk and Bag	550T

Pollution Incident Assessment

Main hazards identified	Likelihood	Details	Pre emptive actions to be taken
Contamination of stormwater		Scenario 1: Truck diesel tank rupture due to collision	Established traffic management plan on site Induction for all contractors on site (including truck drivers)
		Scenario 2: Diesel leak from truck	Spill kit available on site
		Scenario 3: Cementitious product into storm water drains/tank	Scheduled maintenance program in place for underground tank
Release of cementitious product into the atmosphere		Scenario 1: Failure of silo top	Overpressure vents High level alarms
		Scenario 2: Dust collector malfunction	Dust collector excursion monitoring system Product valves isolate automatically if dust collector fails Visual observation
		Scenario 3: Loading/Unloading issues causing cementitious product release into air	All truck drivers to be inducted to site including loading and unloading procedures.

Pollution Incident Management Process



EMERGENCY EQUIPMENT

First Aid personnel

There are a number of first aid personnel on site at any given time. If you have an injury that requires first aid attention, contact the site manager or supervisor for assistance. They can arrange appropriate treatment.

First Aid equipment

There is a first-aid kit in a number of locations around site. The first aid kit is marked with a green sign with a white cross on it.

Emergency eye wash

There are emergency eye-washing units located inside the BPS building and also under the ICL silos.

Firefighting equipment

Firefighting equipment is located around the site.

In an emergency, fight a fire only if you are trained in firefighting techniques and if it is safe to do so.

Emergency Exits

There are emergency exits in all buildings on site. These are identified by the green and white "EXIT" signs above the door. Be aware of the nearest emergency exit to your work area. Always keep emergency exits clear.

Pollution Incident Safety Equipment

Spill containment equipment is located under the silos as per the picture below.



Safety Data Sheets (SDS)

SDS for all hazardous chemicals kept on site can be found in the office.

PROTOCOL FOR NOTIFICATION OF INCIDENTS

The number mentioned above is manned 24 hours. The person manning the telephone will try and capture as much information as possible from the complainant, including:

- The date and time of the complaint
- The method by which the complaint was made
- Any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect
- The nature of the complaint

All this information can be captured through an Environment Incident Report in IRIS.

The person receiving the complaint MUST make the Pollution Incident Chief aware of the complaint immediately.

ICL Transport Manager, Dave Schultze has been designated the Pollution Incident Chief (PIC). He is responsible for managing the *pollution incidents*.

If the *pollution incident* does or is likely to be a breach of EPA License requirements, or *material harm to the environment* is caused, Senior Management Team must be advised immediately. The relevant member of the Senior Management Team will either notify the relevant authorities in the event of a *pollution incident* or instruct the PIC to do so.

Authorities to be notified

The following authorities shall be notified:

Authority	Contact Number
Fire & Rescue NSW*	000
EPA	131 555
SafeWork NSW	13 10 50
Blacktown Council	9839 6000 – After hours 1300 133 491
Ministry of Health	93919000

Communicating with neighbours and local community

In the event of a *pollution incident*, ICL's neighbours are to be notified if the incident is likely to have an impact on their property or operation.

The most likely scenario affecting neighbours would be air emissions.

Below is a list of the closest neighbours to ICL.

Neighbouring company	Address	Contact Number
Coates Hire	204 Power St	(02) 9912 0500
Hy-Tec concrete	202 Power St	(02) 8805 3800
Double D Products	17/197 Power St	1800 676 825
Quirks Australia	198 Power St	(02) 8805 2500
Robert Holmes Transport	196 Power St	(02) 9625 0600
Endeavour Energy Civil Works Centre	15 Belfast Place	(02) 9853 6666

All notification is to be done by PIC via the above noted telephone numbers.

Dependant on the type of incident, wind conditions, PIC will determine which neighbours need to be contacted. PIC will provide them with specific information to minimise the risk of harm and keep them updated on progress.

As part of the communication process, the PIC will need to communicate with the complainant to notify them of the following:

- The action taken in relation to the complaint
- If no action was taken by the company, the reason why no action was taken

TESTING AND MAINTENANCE OF THE PLAN

This plan shall be tested for appropriateness and effectiveness through an annual pollution incident practise drill. The drill can be a desktop exercise or a practical exercise depending the scenario. The drill shall be based on a real scenario that is documented beforehand.

The drill shall involve any employee who would be involved in a real situation. Details of the drill and actions arising from it shall be recorded in the Drill Evaluation Report form through the Inform module in the IRIS system.

Details of the previous drill are listed below.

Date: 02/05/2018

Participants: David Shultz, Blake Robertson, Wayne Patrick, Raymond Ellu, Lauren Hopwood, Trevor Caruana and Allycia Martens

Following the annual practise drill, a review of the PIRMP shall be conducted to include any lessons from the drill and to ensure that it is current and accurate. The updated plan shall be available through the IRIS system and on the organisations internet site.