Port Kembla Pollution Incident Response Management Plan (PIRMP)

Independent Cement & Lime Pty Ltd

Address Gate 7, Foreshore Rd, Port Kembla, NSW, 2505

Phone 1300 440 072

Contents

1 Introduction

Independent Cement and Lime's (ICL) Port Kembla depot operates under an EPA licence, 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 Licence Number: 20730. A copy of the licence can be found in Appendix 1

Licence Holder: Independent Cement and Lime

Site Location: Gate 7 Foreshore Road, Port Kembla. Located within the Morgan Cement International (MCI) Site, refer aerial shots below.

This *plan* has been prepared for use by Independent Cement and Lime. Environmental issues arising out of ICL operations will be covered by this *plan*. This *plan* shall be tested annually, by PIC or delegate. The testing may be done in conjunction with MCI.

As can be seen above, the ICL facility is surrounded by Morgan Cement International (MCI), another EPA licensed facility. In the event of an MCI event, MCI's environmental Management Manual can be found at the following link:

http://www.adelaidebrighton.com.au/assets/download/MCI_Environment_Management_Manual.pdf

1.1 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.

1.2 Authority

A Chief Pollution Incident Controller and Deputy shall be nominated to be responsible for this PIRMP, and its implementation during a pollution incident. These are as follows;

Blake Robertson (Pollution Incident Chief PIC) – 0438 475 579

Chris Lanyon (Deputy PIC) – 0456 028 208

1.3 Contact Details

ICL's Port Kembla site is an unmanned terminal.

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

1300 440 072

This number is answered by the Allocations team at the Glendenning site who are available 24 hours a day, 7 days a week. The Allocations team will notify the Pollution Incident Controller or their deputy.

As an EPA licence condition, this number is displayed on the perimeter fencing for environmental incident notifications by members of the public.

1.4 Training Requirements

The PIC and Deputy PIC shall participate in the annual review of this plan.

Drivers attending the site shall be made aware of the appropriate response to an incident that could cause actual or potential material harm to the environment through the driver induction program, including:

- The procedure to be followed after a *pollution incident* and who should be contacted during and after the incident.
- Contractor induction records are stored in the 'Contractor' module of the IRIS system.

1.5 Drill Exercise

A drill exercise shall be conducted annually to test the effectiveness of this plan and serve as an annual refresher in the appropriate response to an incident that could cause actual or potential material harm to the environment.

The exercise can be desktop or practical and shall pick one of the identified risks and follow the appropriate response, ensuring that the requisite knowledge and provisions are in place to facilitate the response.

The annual test shall be recorded using the Drill Evaluation Report Form through the IRIS system.

The last drill exercise was conducted on the 25th September 2021 by Blake Robertson.

2 Pollution Incident Response Management Plan

2.1 Possible Pollution Incidents

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

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

2.2 Flora and Fauna that could be affected

Any flora and fauna present on site would need to be dealt with in accordance with Morgan Cement EMP. Refer link below:

http://www.adelaidebrighton.com.au/assets/download/MCI_Environment_Management_Manual.pdf

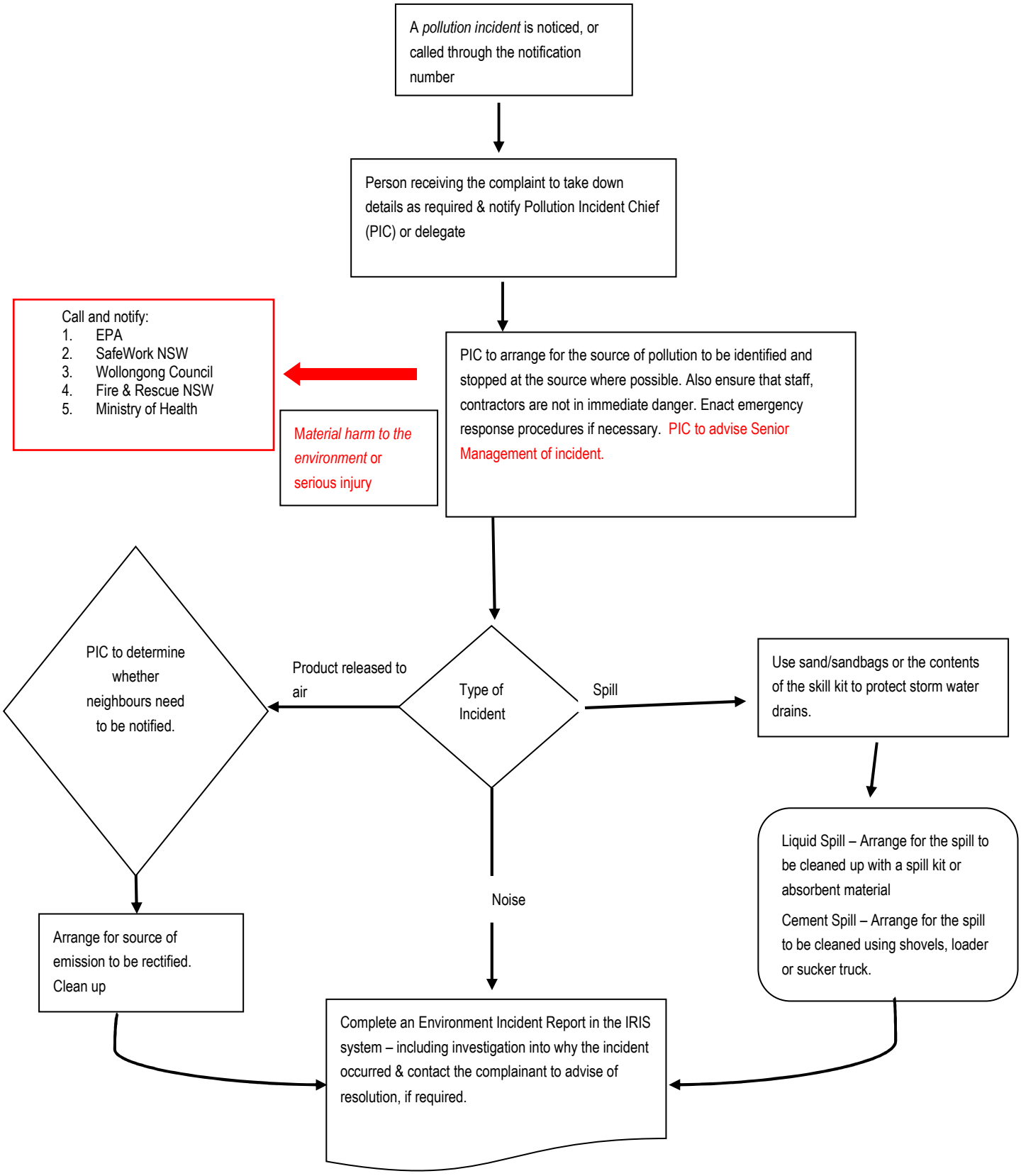
2.3 Inventory of Pollutants

Potential pollutant kept on site	Maximum quantity kept on site
Diesel in the truck	500L per truck
Cement	120 Tonnes
Fly Ash	200 Tonnes
Slag	100 Tonnes

2.4 Pollution Incident Assessment

Details	Main hazards identified	Likelihood	Pre-emptive actions to be taken
Scenario 1: Truck diesel tank rupture due to collision	Contamination of stormwater	Unlikely	Established traffic management plan on site Induction for all contractors on site (including truck drivers) Spillage barriers exist on site to prevent diesel entering waterway.
Scenario 2: Diesel leak from truck	*Slip hazard	Unlikely	Spill kit available on site
Scenario 3: Cementitious product into storm water drains	Contamination of stormwater	Possible	Drain protection filters Drain protection filters to be regularly monitored and cleaned as required
Scenario 1: Failure of silo top	Release of cementitious product into the atmosphere	Possible	Overpressure vents High level alarms High level alarm test
Scenario 2: Dust collector malfunction	*Release of cementitious product into the atmosphere *Respiratory or eye irritation	**Possible**	Visual observation
Scenario 3: Loading/Unloading issues causing cementitious product release into air	*Release of cementitious product into the atmosphere *Respiratory or eye irritation	**Possible**	All truck drivers to be inducted to site including loading and unloading procedures.

2.5 Pollution Incident Management Process



3 Emergency Equipment

3.1 First Aid Personnel

This is an unmanned site, hence there are no trained first-aid personnel on site. If you have an injury that requires first aid attention, contact the MCI workshop for assistance. They can arrange appropriate treatment.

3.2 First Aid Equipment

There is a first-aid kit in each of the portable buildings on site.

3.3 Emergency eye wash

There are emergency eye-washing units located under the silos.

3.4 Firefighting Equipment

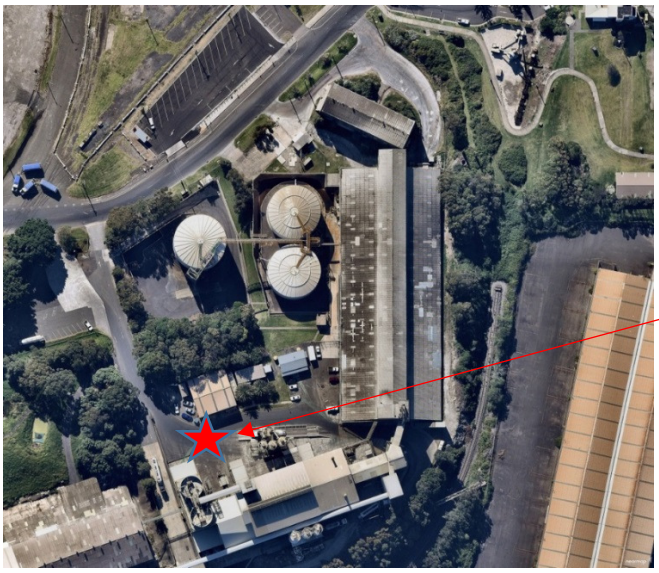
Firefighting equipment is located around the site.

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

3.5 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.

3.6 Emergency Evacuation Area



3.7 Pollution Incident Safety Equipment

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

3.8 Safety Data Sheets (SDS)

SDS for all hazardous chemicals kept on site can be found in the ICL office. As this is an unmanned site, requests for MSDS need to come via the ICL's website http://www.independentcement.com.au/msds/ or via the PIC.

4 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's Transport and Distribution Manager, Blake Robertson has been designated the Pollution Incident Chief (PIC). He can be contacted on 0438 475 579. **Chris Lanyon** has been nominated as the Deputy PIC for the site, he can be contacted on 0456 028 208. The PIC and/or the Deputy PIC are responsible for managing the *pollution incidents*.

If the *pollution incident* does or is likely to be a breach of EPA licence 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.

4.1 Authorities to be Notified

The following authorities may need to be notified in the event of material harm to the environment:

Authority	Contact Number
Fire & Rescue NSW*	000
EPA	131 555
SafeWork NSW	13 10 50
Wollongong Council	4227 7111 – After hours 1300 557 980
Ministry of Health	93919000

4.2 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
Morgan Cement International	Gate 7, Foreshore Rd. Port Kembla	Paul Bollen – 0407 667 220
Port Kembla Port Corporation	91 Foreshore Rd. Port Kembla	02 4275 0100
IXOM	Gate 1, Foreshore Rd Port Kembla	61 2 4255 2700
Pace Logistics	1 Darcy Rd. Port Kembla	1300 389 307
Kayaks2Fish	10 Darcy Rd, Port Kembla NSW 2505	(02) 4067 2465
Vesuvius Australia	40-46 Gloucester Blvd, Port Kembla NSW 2505	(02) 4267 9000

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

Dependent 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 the progress.

5 Waste Disposal

After a spill has been cleaned up it is important to dispose of the material and the contaminated clean-up products correctly. Disposal requirements for the two identified spill risks for the site are listed below:

- Diesel – Diesel is classified as a 'liquid waste' under the NSW EPA classification system. Liquid waste cannot be disposed of as 'general waste' and must be disposed through a licensed waste disposal facility.
- Cement – Cement is classified as 'hazardous waste' under the NSW EPA classification system. Hazardous waste cannot be disposed of as 'general waste' and must be disposed of through a licensed waste disposal facility.

6 Authorisation

This PIRMP has been reviewed for currency and suitability. It shall now be considered effective from the signed date below.

Chief Pollution Incident Controller

Name	Signature	Date
Blake Robinson		01/10/2021

Deputy Chief Pollution Incident Controller

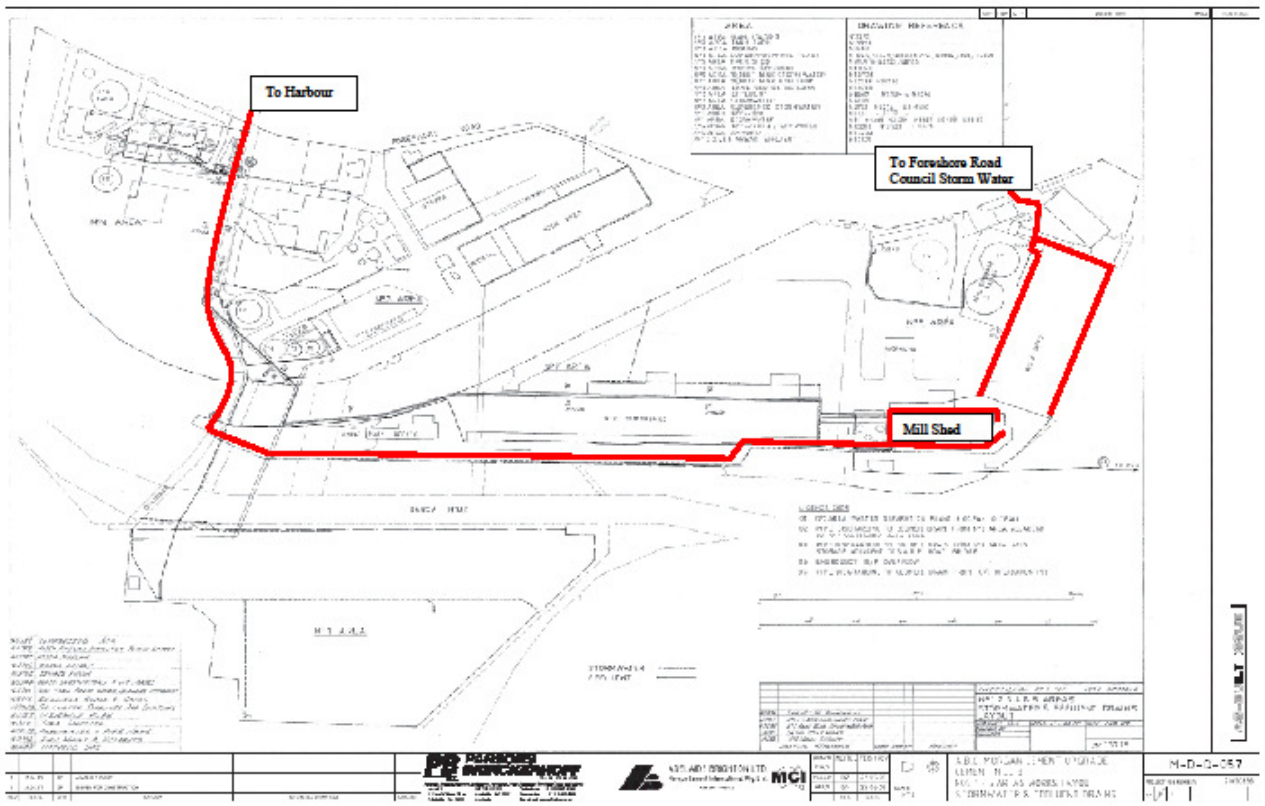
Name	Signature	Date
Chris Lanyon		01/10/2021

7 Revision History

Issue	Date	Amendment	Author
1	26/10/2020	New Document	SHE Manager
2	22/09/2021	Review and update. Deputy PIC updated. Neighbour contacts updated	SHE Manager

Appendix 1 – Site Drainage Map

STORMWATER DRAINS SITE PLAN



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