

Glendenning Pollution Incident Response Management Plan (PIRMP)



Independent Cement

Independent Cement & Lime Pty Ltd

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Version 10



**Independent
Cement**

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1 Introduction

Independent Cement and Lime (ICL) Glendenning 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 License No. 12294

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.

1.1 Definitions

Environmental incident

Environmental incidents are any incident where there is:

- a spill of material
- release of material or noise
- loss of containment of a material

Even if the spill can be recovered it is still considered an environmental incident.



Reportable/Notifiable Environmental Incident

This is an incident that involves:

- a spill of material
- release of material or noise
- loss of containment of a material

and has resulted in or created a 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 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.

1.3 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 Controller) – 0438 475 579

David Schultze (Deputy Pollution Incident Controller) – 0439 117 124

1.4 Training Requirements

The PIC and Deputy PIC shall participate in the annual review of this plan. The review is recorded at the end of the plan. Employees who may be involved in a pollution incident response, including the use of pollution control equipment shall receive appropriate instruction on these subjects through toolbox meetings or training sessions.

SUBJECT	FORUM	DATE
Glendenning EPA license requirements	Toolbox Meeting	29/05/2024

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 including the procedure to be followed after a *pollution incident*, and who should be contacted during and after the incident. Drivers shall be made aware of this through the following inductions.

OPSTRA001 – ICL Glendenning Bagged Truck Driver Induction

OPSTRA002 – ICL Glendenning Bulk Tanker Driver Induction

Contractors are made aware of ICL's environmental responsibilities and how to respond to and report an environmental incident through the site induction (OPSTRA003 ICL Glendenning Site Induction).

Contractor induction records are stored in the 'Contractor' module of the IRIS system.



2 Pollution Incident Response Management Plan

2.1 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 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

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

2.3 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
Fly Ash	550T

2.4 Noise Sources

The main noise sources at the site are the equipment associated with the silos and weighbridges. There are two blowers attached to the silo which operate when tankers are loading product out of the silos. One is based under the silos next to the compressor. The 2nd blower is located upstairs next to the electrical panel. There is also a compressor, however the noise that it emits is minimal compared to the blowers. One compressor runs all silos. It is located at ground level, underneath silo 1.

When tankers are unloading into the silos, they use a blower attached mounted to their prime mover. Most are the same model and would emit a similar level of noise.

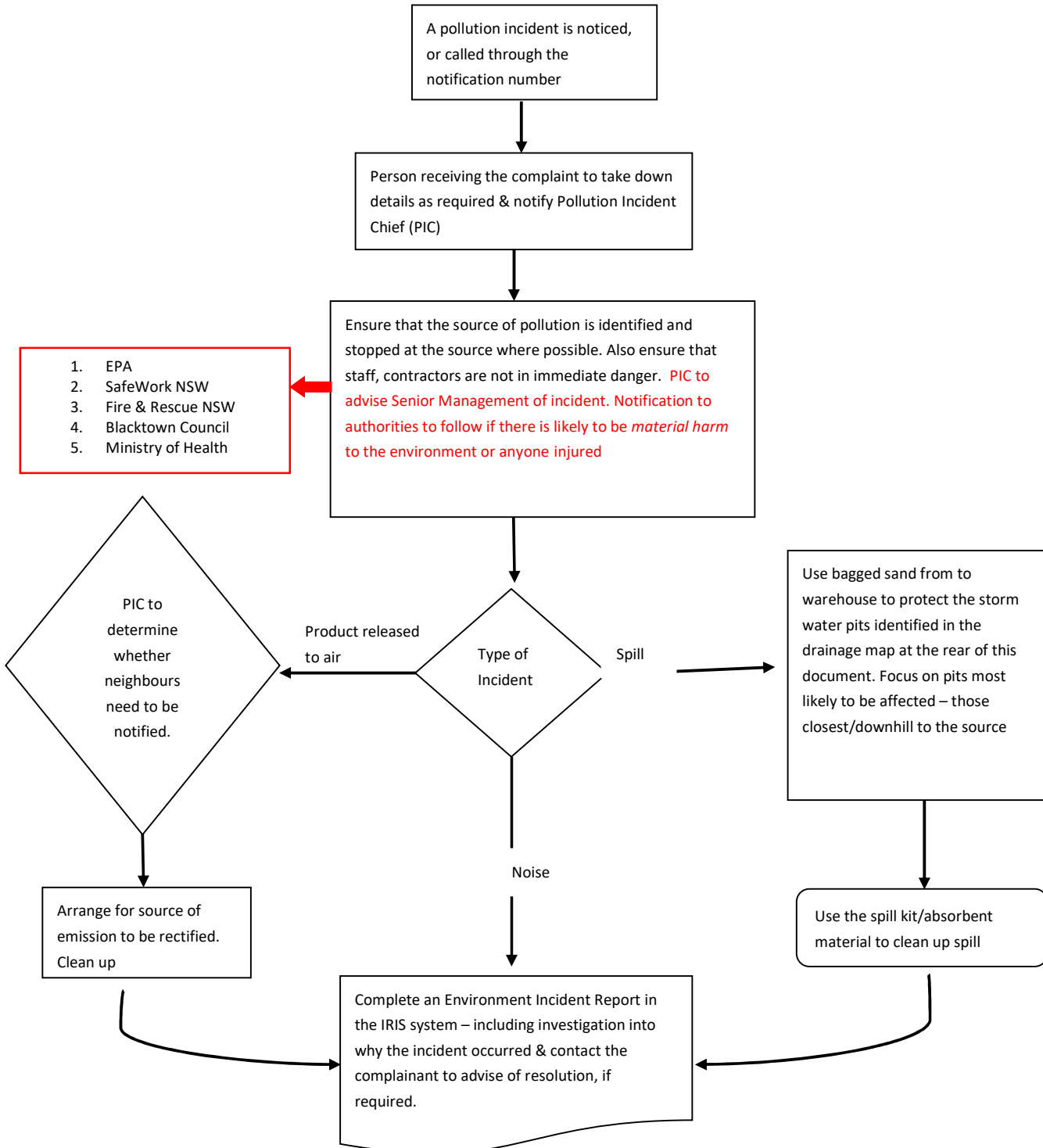
There are no ground-based extraction fans, however there are filtration units at the top of each silo. The dust collector runs continuously whilst tankers are unloading. These would emit a minimal level of noise, but the blowers are considerably louder.



2.4 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 and underground Onsite Stormwater Detention (OSD) tank if it's raining at the time.	Spill Kits Driver induction including spill response Scheduled maintenance program in place for underground OSD 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.
Noise emissions above license conditions or causing offence to neighbours.			

2.5 Pollution Incident Management Process



3 Emergency Equipment

3.1 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.

3.2 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.

3.3 Emergency eye wash

There are emergency eye-washing units located inside the BPS building and also under the ICL 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 Pollution Incident Safety Equipment

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



3.7 Safety Data Sheets (SDS)

SDS for all hazardous chemicals kept on site are stored on the online Chemwatch system. They can be accessed through computers in the office.



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 Transport Manager, Blake Robertson 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 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.

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

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
Earthmoving Equipment Australia	204 Power St	(02) 9671 1000
Hy-Tec concrete	202 Power St	(02) 8805 3800
Double D Products	17/197 Power St	1800 676 825
Boylan Group	198 Power St	1300 500 055
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.

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.

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.

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 and Cementitious Products – 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 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 on 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: 29/05/2024

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.

7 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 Robertson		05.06.2024



Deputy Chief Pollution Incident Controller

Name	Signature	Date
David Schultze		05.06.2024

8 Revision History

Issue	Date	Amendment	Author
1	June 2013		
2	June 2014		
3	May 2015		
4	May 2016		
5	June 2017	Change to Independent Cement format	SHE Manager
6	May 2018	Added date of last training, date of last drill and sign off by PIC and deputy	SHE Manager
7	May 2019	New Document	SHE Manager
8	May 2020	Review and update. Neighbour contacts updated.	SHE Manager
9	May 2021	Review and update. Deputy PIC updated. Neighbour contacts updated	SHE Manager
10	31/05/2021	Update pollution incident assessment	SHE Manager
11	02/06/2022	Clarify definitions of an environmental incident and a notifiable environmental incident. Update neighbour contacts.	SHE Manager
12	05/06/2023	Add section 2.4 noise sources. Update the PIC and Deputy PIC roles. Add details of inductions in training section Update neighbour details	SHE Manager



13	03/06/2024	Updated training and PIRMP drill dates.	
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