

Kembla Grange Pollution Incident Response Management Plan (PIRMP)



Independent Cement

Independent Cement & Lime Pty Ltd

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1 Introduction

Building Products Supplies (BPS) Kembla Grange 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: 20747.

Licence Holder: Building Products Supplies

Site Location: 10 Canterbury Road, Kembla Grange – refer aerial shots below.



This *plan* has been prepared for use by Building Products Supplies. Environmental issues arising out of BPS operations will be covered by this *plan*. This *plan* shall be tested annually, by PIC or delegate.

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 Contact Details

BPS Kembla Grange site operates from 4:00 -24:00 Monday – Friday, 12:00 – 20:00 Saturday.

NSW sites have a designated phone number that is advertised for external people to report pollution incidents to.

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.

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:

Daniel Zohar (Pollution Incident Chief PIC) – 0432 677 490

Steve Baggott (Deputy PIC)

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
Kembla Grange EPA License Requirements	Toolbox Meetings	20/05/2024

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 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 9th November 2023.

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



- Diesel leak from diesel tank held on site.
- Cementitious product into storm water drains
- Failure of silo top
- Dust collector malfunction
- Issues whilst unloading under pressure, causing cementitious product release into air and on the ground.
- Plant, equipment, and vehicles exceeding noise emission limits.

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 storage tank	1000L
Diesel in the truck	200L per truck
Gas Cylinders	13 cylinders @ 15kgs each
Cement (including slag and fly ash) Bulk and Bag	1000T

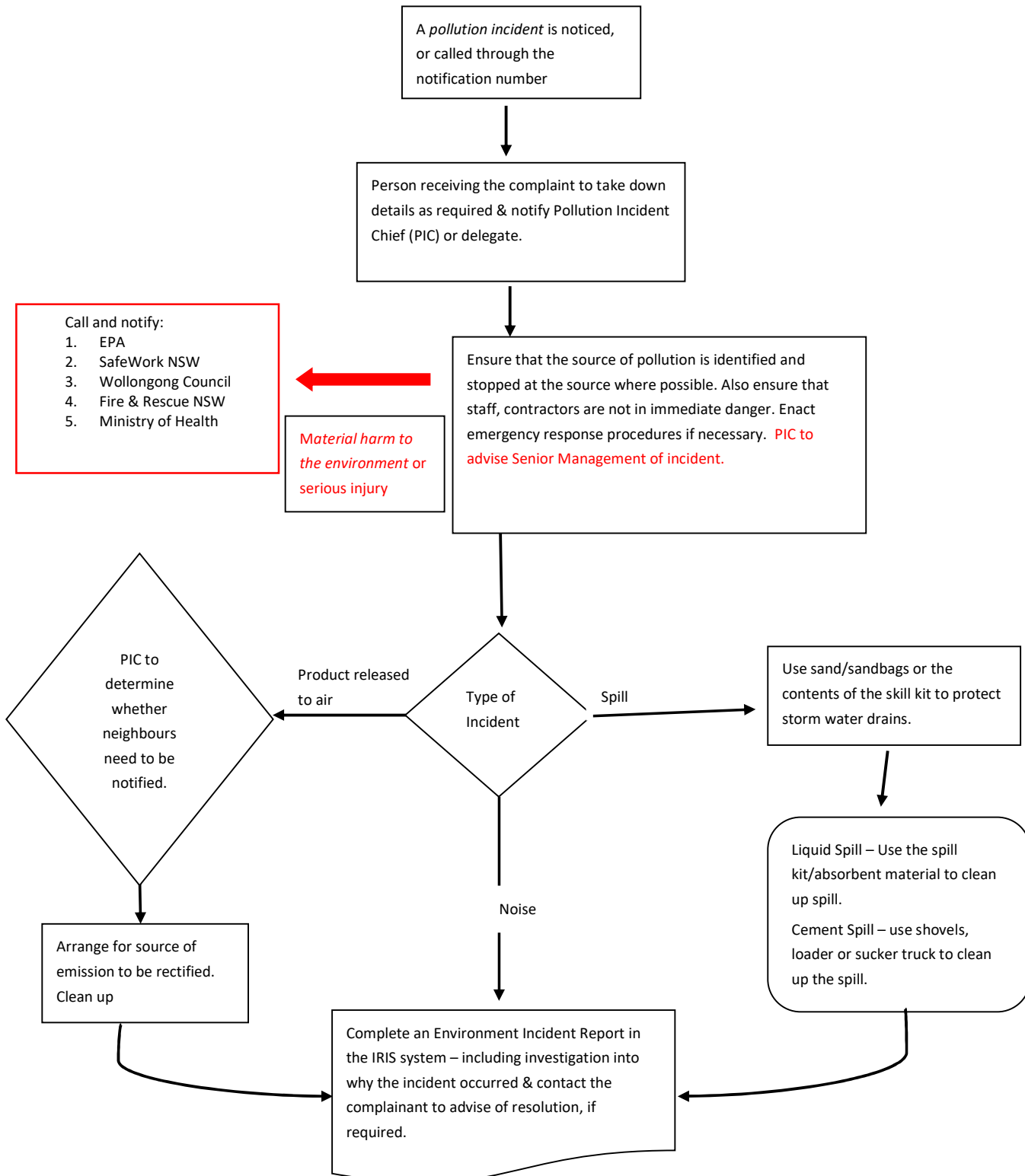


2.4 Pollution Incident Assessment

Details	Main hazards identified	Likelihood	Pre-emptive actions to be taken
Scenario 1: Truck diesel tank rupture due to collision	*Contamination of stormwater *Slip hazard	Unlikely	Established traffic management plan on site. Speed limits. Vehicle exclusion zones Traffic lights Induction for all contractors on site (including truck drivers) A spill kit and sand are available to contain and recover spills.
Scenario 2: Diesel leak from truck	*Contamination of stormwater *Slip hazard	Unlikely	A spill kit and sand are available to contain and recover spills.
Scenario 3: Diesel leak from diesel tank held on site	Contamination of stormwater Slip hazard	Possible	Battery operated pump with safety stop mechanism to prevent leaking. Tank is stored in a sheltered concrete bund. A spill kit and sand are available to contain and recover spills.
Scenario 4: Cementitious product on ground gets washed into storm water drains/tank	Contamination of stormwater	Possible	Site sweeping schedule. Monthly check of spills, cleanliness, and storage of aggregates Drain protection filters. Drain pits and protection filters to be regularly monitored and cleaned as required.
Scenario 5: Failure of silo top	*Release of cementitious product into the atmosphere *Respiratory or eye irritation	Unlikely	Overpressure vents High level alarms High level alarm test

Scenario 6: Dust collector malfunction	*Release of cementitious product into the atmosphere *Respiratory or eye irritation	Possible	Regular servicing of the dust collectors Visual observation – Daily check, weekly report
Scenario 7: Bulk tanker disconnects supply hose and cementitious product is released into the air and on the ground.	*Release of cementitious product into the atmosphere *Cementitious product spill on ground *Respiratory or eye irritation	Possible	All truck drivers to be inducted to site including loading and unloading procedures. Pressure gauge for supply hose and pressure relief valve High and high-high level alarms Interlocked infeed valve Carrier unblocking procedures
Scenario 8: Uncontrolled release of cementitious material from a silo	*Release of cementitious product into the atmosphere *Respiratory or eye irritation	Possible	Silo valve actuator is fail-to-close type. Warning sign on silo about removing actuator.
Scenario 9: Equipment in poor repair creates noise pollution	*Disturbance of neighbours' quiet enjoyment of their environment *Disturbance of neighbours' sleep	Likely	Preventative maintenance program managed through Guardian software
Scenario 10: Noise from compressor on truck creates noise pollution.	*Disturbance of neighbours' quiet enjoyment of their environment *Disturbance of neighbours' sleep	Likely	*Bulk tankers to unload using site compressor and supply hose. *Site compressor is located away from houses and is enclosed.
Scenario 11: Dust from external, raised product conveyor.	*Release of cementitious product into the atmosphere *Spill of cementitious product onto the ground.	Possible	Install hoppers underneath the conveyor to capture the dust and funnel it into bins.

2.5 Pollution Incident Management Process



3 Emergency Equipment

3.1 First Aid Personnel

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

3.3 Emergency eye wash

There are emergency eye-washing units located around site at locations where hazardous materials are handled.

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.

Fire equipment is inspected and if required, serviced every six months.

An annual fire safety statement confirming all required fire equipment is provided and serviced as required is submitted to the council.

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



Emergency Evacuation Assembly Area

3.7 Pollution Incident Response Equipment



- A spill kit is located near the diesel tank on site.
- A spill kit is located in the loading bay.
- Containment socks are located near the maintenance workshop.

3.8 Safety Data Sheets (SDS)

SDS for all hazardous chemicals kept on site can be found through the online Chemwatch system, available through the IRIS system.

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.
- 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 shall be notified:

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*, BPS' 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 BPS.

Neighbouring company	Address	Contact Number
Bunnings	640 Northcliffe Drive Kembla Grange	02 4224 5200



Total Civil Recyclers	222 Canterbury Road, Kembla Grange	0484 514 178
Wollongong City Security	7/295 Princes Hwy Unanderra	02) 4226 1966
Evermill	281 Princes Hwy Unanderra	+61242729128
J&L Borgo Peters Ice Cream	2/289-295 Princes Hwy Unanderra	+61242631600
Unanderra Auto Care	283 Princes Hwy Unanderra	02) 4272 7772
Always Rigging and Lifting Gear	279 Princes Hwy Unanderra	02) 4272 8000
Allcott Hire	275 Princes Hwy Unanderra	+61242720000

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
Daniel Zohar		26/08/2024

Deputy Chief Pollution Incident Controller

Name	Signature	Date
Steve Baggott		26/08/2024



7 Revision History

Issue	Date	Amendment	Author
1	2018	Review and Update	SHE Coordinator
2	04/10/2019	Review and Update	SHE Manager
3	10/10/2020	Review and update. Neighbour contacts updated.	SHE Manager
4	04/10/2021	Review and update. Deputy PIC updated. Neighbour contacts updated	SHE Manager
5	30/09/2022	Review and update. PIC details updated.	SHE Manager
6	02/09/2023	Review and update. PIC details updated. Additional potential pollution scenarios added. Additional control measures added to risk register. Site operating hours updated.	SHE Manager
7	27/08/2024	No changes.	SHE Manager
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Appendix 1 – Site Drainage Map

Appendix 2 – Stormwater Risk Map

