

Pollution Incident Response Management Plan (PIRMP)

Newcastle Grain Terminal

Rev No	Reviewer	Review Date
V1	M.Farnham, E.Dugan	Nov 2012
V2	M. Farnham, E.Dugan	June 2013
V3	M. Farnham, P.Lino	May 2014
V4	M. Farnham, M.Sierszycki	June 2015
V5	M. Farnham, M.Sierszycki, Damien Pfeiffer	May 2016
V6	M Farnham, J Mann, C Casey	May 2017

1.0 Purpose and Background

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the *Protection of the Environment Operations Act 1997* (POEO Act) and associated *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) for licensed facilities.

Under GrainCorp's Emergency Management System, detailed emergency response procedure is already in place for the classification and management of incidents, across GrainCorp operational sites. Under the provisions of Part 3A 98B(2) of the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*, to allow for the integration of requirements into existing plans in respect to pollution incident response, requirements under POEO legislation have been integrated into these existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans and associated procedure. It also details additional supplementary site specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

2.0 Scope

This PIRMP covers GrainCorp's Newcastle (Carrington) Grain Terminal (the Terminal). This plan applies to all activities, products and services on the site over which GrainCorp has operational control.

3.0 Legislative Requirements

Specific legislative requirements for the development and implementation of this PIRMP are provided in the following table.

Table 1

Part 5.7A of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act)
Part 5.7A of the <i>Protection of the Environment Legislation Amendment Act 2011</i> (POELA Act)
The <i>Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012</i>
Environment Protection License (EPL) 1296

4.0 Terms and Definitions

4.1 Definition of a pollution incident

A *pollution incident* means an incident or set of circumstances during or as a consequence of which there 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. It includes an incident or set of circumstances in which a substance has been

Once determined that the incident causes or threatens material harm to the environment, notification must be given immediately, ie. promptly and without delay, after the person becomes aware of the incident.

5.3 Emergency Response

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance (phone 000). The other response agencies must still be contacted after that to satisfy notification obligations.

5.4 Contaminated Land

Persons whose activities have contaminated land and owners of land who become aware, or ought reasonably to be aware, that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination, if the contamination meets certain criteria. The duty to notify is a requirement under section 60 of the *Contaminated Land Management Act 1997* (CLM Act).

6.0 Reference Documentation

The following existing internal plans and procedure documentation underpin this PIRMP.

Table 3

Doc. No	Document
hs-3-00822	Level One Site Emergency Response Plan
hs-3-00823	Level Two Regional Emergency Response Plan
hs-3-00107	Level Three Emergency Response Plan
hs-3-00045	Incident Notification and Escalation Flow Chart
hs-3-00103	Initial Verbal Escalation Chart
hs-3-00162	Incident Notification Form
	Desktop Emergency Kit
	Newcastle Site Emergency Planning Manual

7.0 Newcastle PIRMP

7.1 Description of Potential Hazards and their Likelihood

An *environmental hazard* is a term for any situation or state of events which poses a threat to the surrounding environment. Incident types and associated hazards are detailed in the following sections of existing ERPs.

Table 4

Type of pollution	Hazard	Consequence	Likelihood	Risk Score
Soil & Water	Contamination of soil from Hydraulic hose failure	Moderate	Likely to occur	8
Soil & Water	Contamination of soil and ground water from Application and handling of contact insecticides	Serious	Extremely unlikely to occur	6
Soil & Water	Contamination of soil and ground water from Fuel and chemical storage areas	Serious	Extremely unlikely to occur	6
Soil & Water	Contamination of soil and ground water from Fuel and chemical dispensing	Serious	Extremely unlikely to occur	6
Soil & Water	Contamination of surface water through grain entering stormwater drains	Serious	Extremely unlikely to occur	6
Air	Generating dust through train wagon grain unloading	Serious	Extremely unlikely to occur	6
Air	Generate dust through product transfer on conveyor	Serious	Extremely unlikely to occur	6
Air	Generate dust through loading grain ships	Serious	Unlikely to occur	9
Air	Contamination of air and human health exposure through unexpected release of Methyl Bromide	Critical	Unlikely to occur	14

Storm Water Grates/Mesh

A site stormwater risk assessment has been completed and stormwater grates/mesh have been installed at drain locations which represent the highest risk of spilled grain entering the stormwater system.



Other pre-emptive actions taken to minimise the likelihood of potential environmental hazards include:

- The implementation of a site-specific Environmental Management System (EMS);
- Onsite inductions for employees, contractors and suppliers;
- Monthly environmental inspections.

7.4 Inventory of Potential Pollutants

The main potential pollutants associated with the sites activities are the various types of bulk grains (as listed in Table 6 below which can generate excessive dust in the absence of dust minimisation controls. Total capacity of throughput for the terminal is approximately 1 million tonnes per annum. This throughput is impacted by the weather conditions season to season.

Table 6

Name of Shipped Bulk Material
• Durum Wheat
• Bread Wheat
• Sorghum
• Barley
• Chickpeas
• Canola

In addition, an inventory of all chemicals is maintained under the SAP system, and monthly audits are undertaken to determine actual volumes stored onsite. There are no underground storage facilities at the Newcastle Grain Terminal site. Chemical storage locations are detailed on Map 1, Appendix 1.

The following chemicals are stored on the Newcastle Grain Terminal site:

Table 7

Chemical	Quantity
Alfacron	Approx. 50kg
Dryacide	Approx. 50kg

In response to requirements under changes to 5.7 of the POEO Act regarding pollution incident notifications, the following specific information and contact details are provided for Newcastle Grain Terminal, in the event of an environmental incident.

Excerpt from EPA Website - Protocol for Industry Notification of Pollution Incidents:
<http://www.environment.nsw.gov.au/pollution/notificationprotocol.htm>

Recent changes to Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act) specify new requirements relating to the notification of pollution incidents. The changes take effect from **6 February 2012** and require the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution incident.

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

- the appropriate regulatory authority (ARA) for the activity under the POEO Act (usually the EPA or local authority) – the local authority is a local council of an area under the Local Government Act 1993), the Lord Howe Island Board for Lord Howe Island, or the Western Lands Commissioner for the Western Division (except any part of the Western Division within the area of a local council)
- the EPA, if it is not the ARA – phone Environment Line on 131 555
- the Ministry of Health via the local Public Health Unit – see www.health.nsw.gov.au/publichealth/infectious/phus.asp
- the WorkCover Authority – phone 13 10 50
- the local authority if this is not the ARA
- Fire and Rescue NSW – phone 000.

The appropriate contact for the relevant local authority and Public Health Unit will vary. All necessary contact numbers should be found in advance and stored for immediate access should a pollution incident need to be notified. These contact numbers should also be identified in the Pollution Incident Response Management Plan prepared for the premises.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkCover.

If, under application of internal incident classification procedures, an environmental incident is determined to have caused or threatened material harm to the environment at the GrainCorp Newcastle site, the following internal and external stakeholders must be contacted immediately, in alignment with internal notification and escalation procedures.

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents. If the incident does not require an initial combat agency, or once the

NSW Ministry of Health	Newcastle Office (diverts to John Hunter Hospital)	Phone: (02) 4924 6477 (Ask for Public Health Officer on call)
NSW WorkCover Authority		131 050
Local Council	Newcastle City Council	Phone: (02) 4974 2000

7.6.3 Other Key Stakeholders / Immediate Neighbour Notification Contact Details

Table 11

Stakeholder	Contact Name	Contact Details
Newcastle Port Corporation / Environment Officer	Jackie Braithwaite	Phone: (02) 4985 8204
Newcastle Community Transport	Robyn Houston	Phone: (02) 4961 3113 0427 247 251
Newcastle Stainless	Scott Kerslake	Phone: (02) 4965 3633 0449 867 365
Newcastle Mini Cranes	Lee Taylor	Phone: (02) 4961 5777 0412 098 777
Residents	Not disclosed due to Privacy Act	Not disclosed due to Privacy Act

7.7 Communicating with Neighbours and the Local Community

7.7.1 Communication

Communication and updates regarding pollution incidents will be undertaken in accordance with existing procedure as detailed in existing ERPs. Internal ERPs (Levels One, Two and Three) provide detailed procedure for communicating with neighbours and the local community, dependent upon the nature and scale of an incident. In the event of a notifiable incident, the appropriate emergency response plan and associated external communication process will be deployed.

Procedures for stakeholder communication are detailed under the following sections of existing ERPs.

Table 12

Doc. No	Document	Reference
hs-3-00822	Level One Site Emergency Response Plan	Section 5.1
hs-3-00823	Level Two Regional Emergency Response Plan	Section 4
hs-3-00107	Level Three Emergency Response Plan	Section 6

7.7.2 Immediate Neighbours and community

In response to the introduction of changes to 5.7 of the POEO Act, and as part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, decisions to notify neighbours and the local community will be made in consultation with regulatory authorities.

- Caged areas for gassed cylinders located at the Maintenance Workshop and the Fumigation Compound
- Vesda system

Training:

Training is provided to GrainCorp employees and any other person entering the site so that they are aware of site hazards and processes in the event of a pollution incident. Training includes inductions, toolbox talks and simulated desktop scenarios and simulated exercises. A full training matrix is located in Appendix 3.

Administrative:

Administrative controls to minimise harm to persons on site include;

- Risk assessments for tasks undertaken on site
- Safe Work Method Statements
- Safety Signage across the site
- SDS register
- Site safety, health and environment inspection checklists
- Site Emergency Procedures booklet
- Toolbox talks, safety alerts

PPE:

See section 7.5

Activation of a Warning Alarm:

The alarm may be raised by anyone noting an emergency situation. It is also crucial that personnel notify the SEO (Site emergency officer) of what has occurred, what your actions have been and any identified issues. Response actions will be initiated based on this information.

A combination of, communication methods are available. They include:

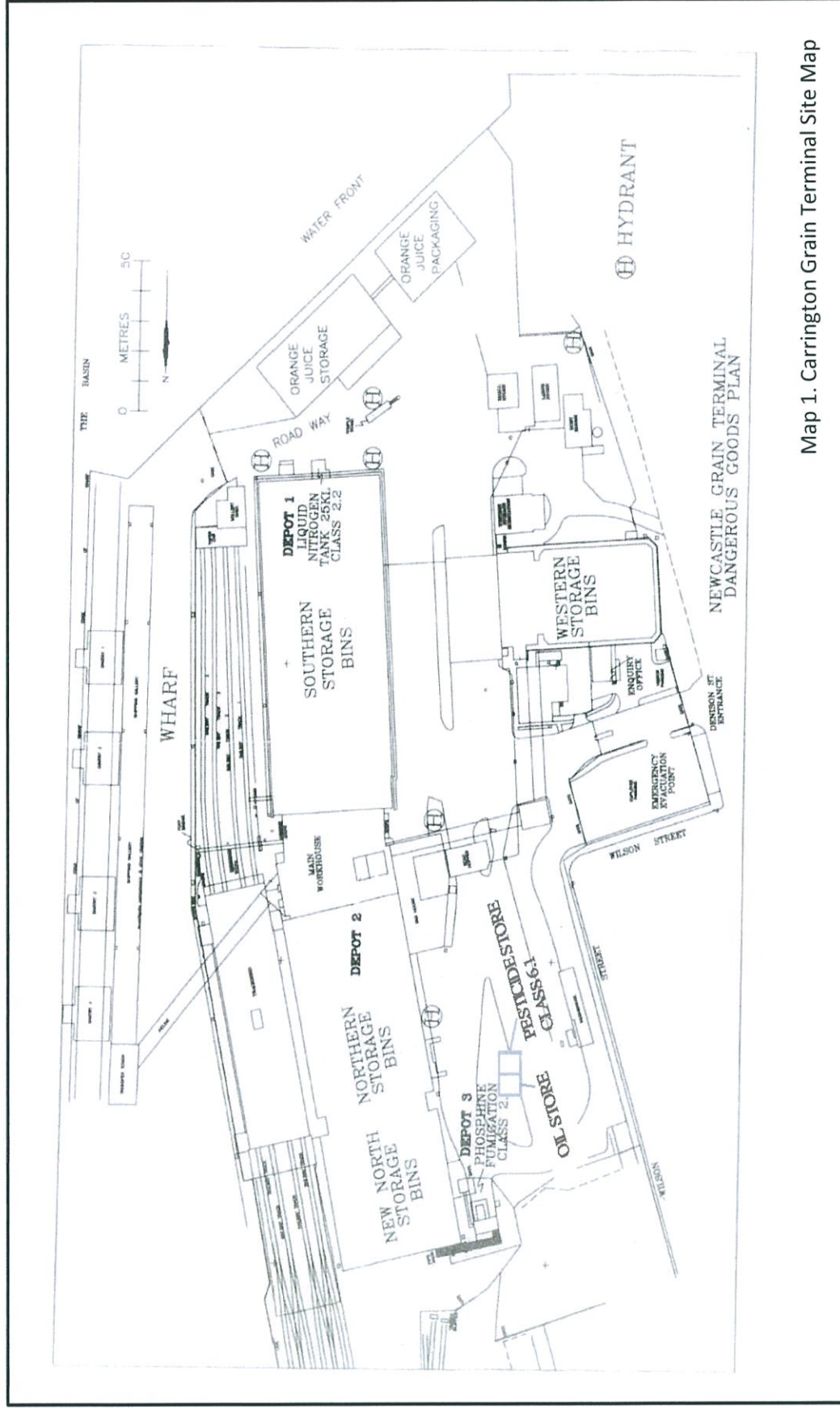
- Verbal communication between employees and others
- Radio communication
- Audible alarm
- Loud speaker system
- Siren(s)
- Telephone - including mobiles

Electronic alarms are tested and maintained at regular intervals.

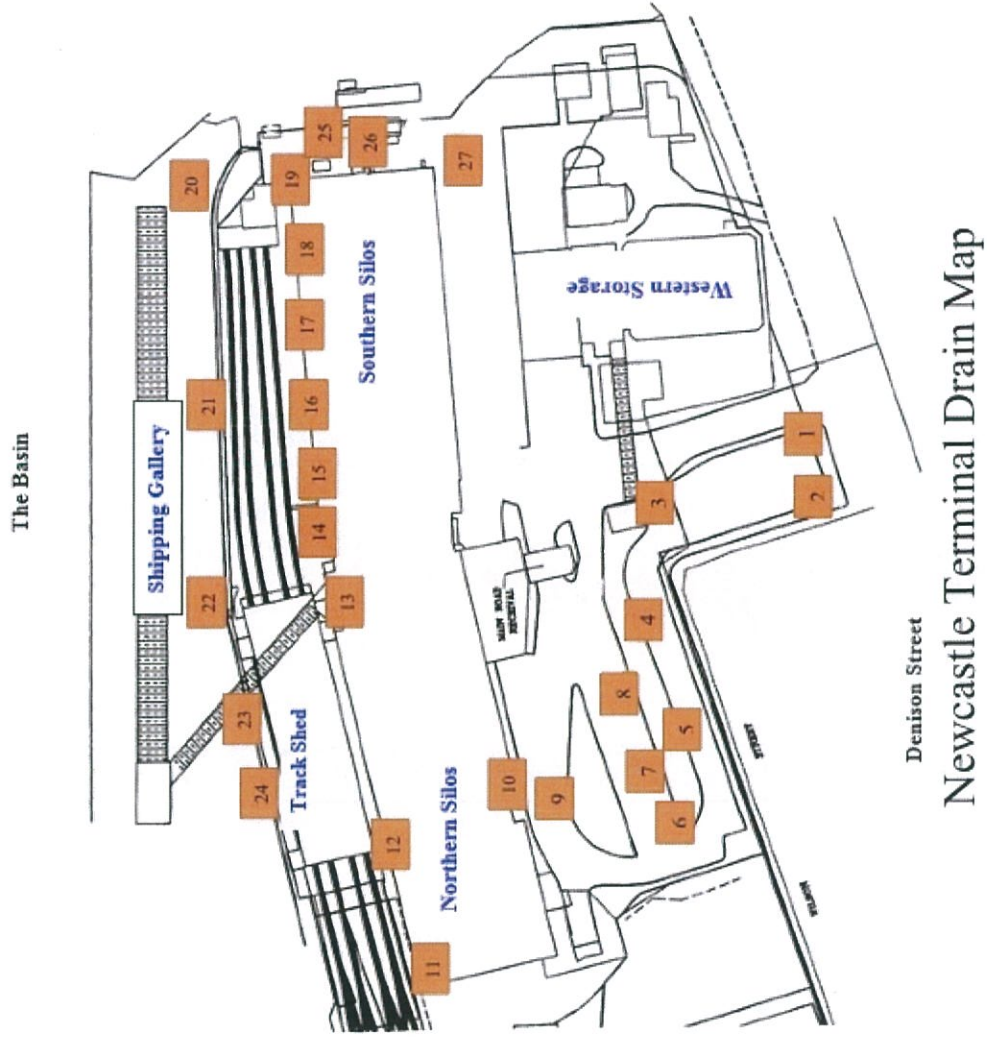
Practice evacuations are conducted regularly to meet the requirements of the OHS Management System Program. The alarm system is covered during training and induction processes.

		<ul style="list-style-type: none"> Initiate “Internal Emergency” procedures as per the Emergency Procedures booklet
Minor Chemical Spills/Leaks	Generally, small quantities of hazardous materials are held on site and are managed following strict procedures and used by trained and experienced staff. Spill kits are provided as appropriate	<ul style="list-style-type: none"> Raise the alarm to alert the site supervisor Identify the material spilt and contain in accordance with MSDS (protect drainage using methods outlined in MSDS), if it is safe to do so If unable to contain, Dial 000 and give name, location and details to the operator, secure the area and, if required, evacuate the site Ensure access and guidance for emergency services Account for all personnel (including visitors) Follow GrainCorp OHS reporting requirements DO NOT ATTEMPT TO CLEANUP IF UNAWARE OF SUBSTANCE NATURE Initiate “Internal Emergency” procedures as per the Emergency Procedures booklet
Spillage of bulk grain into stormwater drains	Spills generally contained within storage and conveyor areas (internal). Minimal opportunity for grain to be in proximity to drains.	<ul style="list-style-type: none"> Raise the alarm to alert the site supervisor Contain spillage to minimise impact Notify stakeholders (internal and external) Clean up spillage Work with authorities
Dust from loading/unloading operations Ship/Truck/Rail	Dust generated as a result of grain movement	<ul style="list-style-type: none"> Cease operation Assess dust extraction systems functionality Assess dust suppression systems functionality Analyse TEOM data Recommence as appropriate

7.10 Training and Testing of the Plan



Map 1. Carrington Grain Terminal Site Map





Appendix 3

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