Pollution Incident Response Management Plan (PIRMP) – Port Kembla Grain Terminal (Website Version)

GrainCorp

1. PURPOSE AND BACKGROUND

The Port Kembla Terminal (PKT) 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. GrainCorp currently holds Environment Protection Licence (EPL) 3693 at the GrainCorp Port Kembla Terminal (PKT) premises.

This website version of the PIRMP outlines the components of the Port Kembla Terminal Plan required to be published on GrainCorp's website (https://www.graincorp.com.au/safety-health-environment/) in accordance with the POEO Act.

Content included in this PIRMP website version addresses the following legislative requirements:

Section 153C(a) of the POEO Act: The procedures to be followed by the holder of the relevant Environment Protection Licence, or the occupier of the relevant premises, in notifying a pollution incident to:

  (i)   *the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and*
  (ii) *the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and*
  (iii) *any persons or authorities required to be notified by Part 5.7.*

Section 98C(1)(h) of the POEO Act: the contact details of each relevant authority referred to in section 148 of the Act

Section 98C(1)(i) of the POEO Act: details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on.

2. SCOPE

The PIRMP covers the PKT operations which includes the GrainCorp's Port Kembla Terminal, the Bulk Liquid storage facility and the Fertiliser Distribution Centre (the Port Kembla Terminal). This plan applies to all activities, products and services on the site over which GrainCorp has operational control. Other environmental emergency plans that are in operation across the PKT are linked to the PIRMP. Temporary activity outside of the scope, e.g. construction, would be managed using the PIRMP if it is found suitable or a supplementary response management plan specific to the temporary works.

3. NOTIFICATION PROCEDURE AND CONTACT DETAILS

The following section details GrainCorp's compliance with section 153C(a) and 98C(1)(h) of the POEO Act.

Incident notification is detailed under the appropriate sections of the existing Port Kembla ERP and the Wharf Procedure consistent with requirements specified by the POEO Act. Refer to these procedures to determine what information is required to be immediately reported to authorities in the event of a pollution incident.

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 the Port Kembla Terminal. 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 PKT, the following notification procedures must be undertaken immediately, and in alignment with internal notification and escalation procedures (escalation workflow provided in attachment A).

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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)**
- **the EPA, if it is not the ARA**
- **the Ministry of Health via the local Public Health Unit**
- **the SafeWork NSW**
- **the local authority if this is not the ARA**
- **Fire and Rescue NSW**

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 SafeWork NSW (previously WorkCover).

Table 1 - External relevant authority contact details

Authority	Contact Details
First Responders: Fire and Rescue NSW, NSW Police and NSW Ambulance Service	000
NSW Ports	(02) 4275 0700 – Port Kembla HSE & Risk Manager
NSW Environment Protection Authority (EPA)	131 555
Vessel Traffic Centre	(02) 4275 0197
NSW Ministry of Health Wollongong Public Health Unit (Illawarra Shoalhaven LHD)	(02) 4221 6700, After hours: (02) 4222 5000 (Wollongong Hospital) Ask for Public Health Officer on call
SafeWork NSW	13 10 50
Wollongong City Council	(02) 4227 7111
Fire and Rescue NSW	1300 729 579 *Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.*
Non-emergency – Hazmat Unit, Shellharbour	(02) 4297 4485
Non-emergency – Wollongong Fire Station	(02) 4224 2020
Non-emergency – Wollongong LAC	(02) 4226 7899
Non-emergency – Ambulance Illawarra	(02) 4227 0222
NSW Ministry of Health	(02) 4221 6700, After hours: (02) 4222 5000 (Wollongong Hospital)- Ask for Public Health Officer on call

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3.1. OTHER KEY STAKEHOLDERS / IMMEDIATE NEIGHBOUR NOTIFICATION CONTACT DETAILS (EXTERNAL NOTIFICATION)

Due to its industrial location in a secured and restricted port quarantine zone, there are no immediately surrounding residential properties. 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.

After consultation with the regulatory authorities, if required the Operations Manager or Site Manager will undertake the early warning of the immediate neighbours in the first instance by phone. The initial notification will be brief and contain only a description of the environmental threat together with instructions what to do.

For example:

- Due to a fire on site, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice.
- An accidental discharge occurred from the site. Emergency vehicles may possibly be present on roads leading to the terminal.

Table 1 outlines the contact details of each relevant authority referred to in section 148 of the Act.

Table 2 lists nearby neighbours and key stakeholders that may need to be contacted following a pollution incident. Determining who to contact and when is up to the discretion of the terminal manager and upper management.

Table 2 - Other key stakeholders and neighbors contact details

Agency	Phone Number
NSW Ports – Office Hours After hours – BSMS Security	
Port Kembla Port Corporation VTIC	
Australian Amalgamated Terminals (AAT)	
Autocare	
Prixcar Services	**Personal information has been removed for privacy purposes**
CEVA Logistics	
AutoNexus	
Port Kembla Coal Terminal	
Pacific National	
Quattro Port Kembla	

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3.2.   INTERNAL CONTACT DETAILS

Table 3 lists the names, positions and 24-hour contact details of those key individuals who:

- are responsible for activating the plan
- are authorised to notify relevant authorities under section 148 of the Act
- are responsible for managing the response to a pollution incident.

Table 3 - GrainCorp 24-hour Internal Notification details Port Kembla Terminal

Internal Notification		
Contact Position	**Contact Name**	**Contact Details**
SNSW Regional Operations Manager	Craig Cochrane	
Site Manager	Dylan Clarkson	**Personal information has been removed for privacy purposes**
Hygiene and Pest Control Supervisor	Tom Zimmermann	
Maintenance Supervisor	Daniel Kadwell	
Distribution Centre Manager	Mick Davies	

3.3.   COMMUNICATION

Contact details for the Port Kembla Terminal are publicly available via local directories and to surrounding industry via signage on the GrainCorp security gate. The contact details for Port Kembla Terminal are as follows:

Address: Corner of Tom Thumb Road & Farrer Road, Wollongong NSW 2500

Phone: (02) 4224 6444

Communication and updates to neighbours and staff regarding pollution incidents will be undertaken in accordance with existing procedures as detailed in the existing ERP, Incident & Escalation Procedure and contact details provided within this document.

Table 4 - Procedures for stakeholder communication including existing ERPs

Document	Format
Port Kembla Emergency Response Procedure	Flipchart on site
GrainCorp Incident and Injury Management Standard	Controlled document on SharePoint
Bulk Liquids Wharf Unloading Emergency Procedure (Wharf Procedure)	Hard copy at berth

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4. MINIMISING THE RISK OF HARM

The following section details how GrainCorp satisfies section 98C(1)(i) of the POEO Act.

The following section includes actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises, who are likely to be on the premises or are located in the vicinity of the site and may be impacted should an incident occur.

At all times minimising harm to persons on premises shall be a priority and is achieved through the activation of the emergency evacuation procedure, engineering controls, administrative controls and standard site PPE enforced across site.

4.1. EMERGENCY EVACUATION PROCEDURE – ACTIVATION OF A WARNING ALARM

As is standard on site, the alarm may be raised by anyone noting an emergency situation. It is also crucial that personnel notify the Control Room on either **(0) 26408 or 02 4224 6808** 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
- 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 and emergency evacuation procedure is included during site training and site inductions.

Port Kembla Terminal has in place comprehensive site-based emergency response and evacuation procedures.

4.2. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

1. **Assess and notify of incident if required:** Follow the internal incident management procedures, including the Environmental Emergency tab of the *Port Kembla Emergency Response Procedure* (flipchart) and when unloading oil ships the *Bulk Liquids Wharf Unloading Procedure*. These provide detail on immediate action to be undertaken during or after an incident, dependent upon type and classification.

2. **Control the incident** with available response equipment and procedures.

3. **Classify incident and escalate**: Follow internal notification requirements and classify incidents according to the *Group Incident Notification & Escalation Procedure.* The procedure provides details on classifying emergency incidents as either Level One, Two, Three or Four where Four is the most critical incident.

4. **Report the Incident:** Follow the *Port Kembla Emergency Response Procedure (flipchart)*, report to Sphera and contact PKT neighbours.

In the event of a pollution incident for the hazards identified, as an example the following steps would be undertaken:

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- Raise the alarm to alert the Site Manager as per the PK Emergency Response Procedure (flipchart).
- Identify the material spilt/contaminant and contain in accordance with SDS (protect drainage using methods outlined in SDS), 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 reporting requirements within the Group Incident Notification & Escalation Procedure.
- Notify stakeholders (internal and external).
- Work with authorities.
- DO NOT ATTEMPT TO CLEANUP IF UNAWARE OF SUBSTANCE NATURE

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4.3.   EMERGENCY ACCESS TO PORT KEMBLA TERMINAL

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1 ATTACHMENT A - ESCALATION PROTOCOL (GRAINCORP INTERNAL)

Incident Notification and Escalation Flow

The flowchart below pictorially shows the incident reporting, notification and escalation requirements set out in the above incident notification table. Key phone numbers are also shown on the chart below.

For all Level 5 (Extreme) & Level 4 (Major) incidents

For Fraud, Bribery, Corruption or Illegal Activity events – please refer to the *Whistleblower Procedure* if you would prefer to make a confidential disclosure in relation to these events – the procedure is available on Jumbunna and the GrainCorp website

SHE ORGANISATION (SHE Incidents)

Site / Plant / Terminal / Corporate Manager
→ SHE Manager → GM SHE

As appropriate:
GM Human Resources
Environment Advisor
Rail Compliance Mgr
Road Compliance Mgr

LINE ORGANISATION (All Incidents)

Site / Plant / Terminal / Corporate Manager
→ Line Manager → GM Operations

Level 4 Lost Time Injury
Site / Plant / Terminal / Corporate Manager to call CEO within 24 hrs
CALL (24hrs):
+61 419 133 433

All Level 5 Incidents
Site / Plant / Terminal / Corporate Manager to immediately call *Incident Reporting Hotline*
CALL (24hrs):
+612 9266 9436

From initial notification until last notification not more than 2 hours

Consult with Group Legal (General Counsel) about, and prior to, potential notification to regulatory authorities, unless a significant incident requires immediate notification to regulatory authorities in order to mitigate risk.

Ensure notification to:
Chief Operations Officer (+61 400 362 311)
Corporate Affairs (+61 447 894 834)
General Counsel & Company Secretary (+61 421 616 828)
Insurance Manager (+61 419 427 665)
Chief People & Transformation Officer (+61 413 177 758)
and email
incidentreportinglegal@graincorp.com.au

DECISION POINT: ACTIVATE CRISIS MGMT TEAM

If appropriate:
CEO
All ELT
Board of Directors (required for Fraud events)

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