

SHSMS Pollution Incident Response Management Plan (PIRMP)

NEWCASTLE – 2023-24
(Berth 2 Heron Road, Kooragang)

SHSMS-QP-20-PLN-NTL1003

Version control

Version	Change from previous	Date	Comment
1.0	First issue of the plan	28/04/2021	First issue of the plan
1.1		01/07/2022	Annual Review
1.2	Update of appendix A	01/07/2023	Annual Review

Authorised

The following managers give authority to implement the information provided within this plan.

Name	Position	Signature	Date
Scott Coxon	Operations Manager		01/07/2023

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1. Purpose

1.1 Introduction

This Pollution Incident Response Management Plan has been prepared to comply with the requirements under Part 3A Clause 98D(2) & 98D(3) of the Protection of the Environment Operations (General) Regulation 2009.

A Pollution Incident Response Management Plan must be prepared for all holders of an Environment Protection Licence (EPL).

Extracts of this document have been made available to meet the requirements of Clause 98D(2) and are made available on the Qube website.

Under the Act, the relevant authority for Lot 62 & 63 Heron Road, Kooragang is the Environmental Protection Authority (EPA).

1.2 Scope

The aim of the PIRMP is to provide an easily interpreted reference document that ensures pollution incidents can be managed and responded to in an appropriate manner. The PIRMP is applicable to all facets of Qube Ports operations and describes how incidents relating to pollution will be managed.

1.3 Objectives

The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about the pollution incident to the:
 - Qube Ports and sub-contractor personnel.
 - Environmental Protection Authority (EPA).
 - WorkCover NSW.
 - Fire and Rescue NSW.
 - Port of Newcastle.
 - Neighbours outside the facility that may be affected by the impacts of a pollution incident.
- Minimize and control the risk of pollution incident at the facility through:
 - Identification of risks.
 - Development of planned actions.
 - Implementation and close out of the planned actions in a timely manner.
- Ensure the plan is implemented by:
 - Trained personnel with responsibility for implementing the plan.
 - Regular testing for accuracy, currency and suitability.

1.4 Glossary of Terms

Officer in Charge

Means the Operations Manager, or GM Ports who are responsible for responding to and managing any emergency situation on Lot 62 & 63 Heron Road, Kooragang.

Emergency Management Team

Means a working team consisting of key personnel who are responsible for the development of procedures and guidelines for staff who are operating under the EMP.

Emergency Operations Centre

Means a facility established at the incident source from which the Officer In Charge exercises control in relation to all incidents. This is the point where coordinating agency heads assemble to receive and disseminate information and make operational decisions on the immediate rescue operation

Emergency Management Centre

Means a facility established by Qube Ports from where the EMT exercises control in relation to major, significant and/or reportable incidents.

Hazardous Materials

Means materials which, without adequate safeguards, may contaminate the environment to immediate or subsequent detriment of that environment or human society and which includes all dangerous goods.

Incident

Means the actual or imminent occurrence of an event which:

- Endangers or threatens to endanger the safety or health of Qube Ports staff, passengers or members of the public; or
- Destroys or damages, or threatens to destroy or damage, any Qube Ports property;
- Being an event, which requires immediate action and a coordinated response. Incidents may either be a crisis or a disaster; or
- Being an event, which causes or threatens to cause pollution or harm to the environment.

Response

Means the process of combating an emergency and of providing immediate relief for persons and assets affected by the emergency.

1.5 Table of Abbreviations

HRERP	Heron Road Emergency Response Plan
EMC	Emergency Management Centre
EMP	Emergency Management Plan
EMT	Emergency Management Team
ERT	Emergency Response Team
EOC	Emergency Operations Centre (Site Control)
EOT	Emergency Operations Team (Site Control)
EPA	Environmental Protection Authority
GRN	Government Radio Network
OIC	Officer in Charge
SHSMS	Safety, Health, Sustainability Management System

1.6 EOT Organisational Structure

The role of the EOT is to provide an emergency operations structure so that the organisation can effectively respond to incidents which may occur at Lot 62 & 63 Heron Road, Kooragang. The EOT addresses the need for incident command onsite, internal and external communications with stakeholders and coordination of resources.

The structure of the Emergency Operations Team (EOT) is as follows:

Role	Position	Alternative Holder (s)	Activation responsibility/action
Officer in Charge	Operations Manager	Shift Manager	Authority to Activate the Emergency Response plan on all incidents. Responds on-site for all incidents Assumes control on-site for all incidents Activate the Emergency Management plan on all major incidents and significant incidents with a potential to be major incidents
EOT Recorder	Administration Assistant	Shift Manager	Assis with the implementation of the emergency response plan Co-ordinates the set up and establishment of the EOC Maintain a current activity log

During emergency situation, wardens shall be identified by the use of coloured safety helmets as follows:

- Officer in Charge – yellow helmet
- EOT Recorder – red helmet

1.7 Environmental Protection Licence Details

Criteria	Details
Licensee	Qube Ports Pty Ltd
EPL Number	20493
Anniversary date	19 th March
Premises	Newcastle Port – Heron Road Kooragang NSW 2304
Contact details	Johl Hayes General Manager Safety Health & Sustainability Qube Ports Johl.Hayes@qube.com.au
Website	www.qube.com.au
Scheduled activity	Waste Storage

2. Description of Likelihood and Hazards


Overall hazards and risk for the Project are determined through Qube Ports Risk Management Framework and reflected in its Risk Register.

2.1 Hazard and Risk Assessments

Assessing hazards and risk on a work task level, are managed through the Job Safety Environmental Analysis (JSEA) Procedure. This procedure identified hazards associated with a work task and develops solutions for each hazard that either eliminates or controls such hazards. This is commonly referred to as the Take 5 process.

2.2 Evaluation Criteria and Risk Ratings

The qualitative measures are used to estimate the consequence or impact of an event, along with the estimate of likelihood, to produce consistent risk rankings across the identified risks. This process is defined in Qube’s Workplace risk management procedure. An extract of the manual with the matrix is below.

		First aid, near miss, hazard identified, low environmental impact	Medical treatment injury, return to work injuries, some environmental nuisance	Lost time injury, partial impairment, on-site environmental harm, substantial environment nuisance	Permanent disability, single fatality, off-site environmental harm, on-site major contamination	Multiple fatalities and / or likely environmental protection agency prosecution
		Insignificant	Minor	Moderate	Major	Critical
Expected to occur in most circumstances	Almost Certain	L 8	M 14	H 19	E 24	E 25
Probably occur in most circumstances	Likely	L 7	M 13	H 18	H 21	E 23
Should occur sometime (1 to 10 times a year)	Possible	L 4	L 9	M 15	H 20	H 22
Could occur at some time (once every 2 to 10 years)	Unlikely	VL 3	L 5	L 10	M 16	M 17
May occur only in exceptional circumstances (once every 11 to 100 years)	Rare	VL 1	VL 2	L 6	L 11	L 12
(VL) Very Low - the risk should be managed as far as reasonably practicable, work may commence and no escalation necessary (L) Low Risk- Acceptable region, should be managed by routine procedures (M) Moderate Risk- Risk considerable enough for work not to commence without consideration and use of control measures (such as preparing SWMS) (H) High Risk- Risk is unacceptable, work must not commence, risk must be treated, if reasonably practicable further consideration given to whether additional control measures are required (E) Extreme Risk- Unacceptable level of risk, controls must be immediately implemented to reduce risk or the risk eliminated (i.e. cease activity)						

3. Pre-Emptive Actions

3.1 Preparedness and inspections

The key to effective prevention of pollution incidents is regular inspections, continuous review of procedures and risk assessments. Mitigation strategies include:

- Provision of spill and containment kits at regular intervals and regular inspections.
- Activity specific and daily risk assessments.
- Review and development of work procedures and safe work method statements in consultation with relevant work teams, Safety & Assurance team members and senior management.
- Daily inspections of active work areas.
- Completion of routine environmental checklists.
- Internal and external audits on Environmental compliance.
- Community notification of major and construction updates.

3.2 Training and Drills

To ensure the workforce is ready to respond to pollution incidents, regular drills and specific training occurs. The training is to ensure that when required, an ERT and EMT can be established to and effectively respond as required. Toolbox talks on spill kit use and incident response to convey critical information and raise awareness.

The HRERP is to be tested and emergency drills conducted as follows:

- An annual drill is to be held to test the response capability of the Lot 62 & 63 Heron Road Site to a major incident. This drill is to encompass yard evacuation, testing of alarms
- Response drills will be done at least yearly and will include at least one of the following:
 - Environmental Incident – Spills;
 - Fire / Explosion;
 - Person(s) Injured;

3.3 Evacuation

Detailed information on the evacuation procedures to be followed in the event of an incident / emergency are contained within Lot 62 & 63 Heron Road Emergency Response Plan.

4. Inventory and Safety Equipment

4.1 Inventory

Qube Ports Lot 62 & 63 Heron Road currently has a mothballed plant the system includes, but is not limited to:

- Conveyor belts,
- Hoppers
- Gearboxes.
- Mobile plant of up to 6 trucks.

The site is audited periodically via internal and external stakeholders. To meet the requirements of the Act, continuous monitoring of the Hazardous Chemicals Register and Manifest is undertaken, with amendments made as required.

4.2 Safety Equipment

The Operations Manager must ensure all required emergency equipment is available at and is appropriately located and maintained in good working order. First aid provided in every truck. Each workshop has a first aid kit which must be inspected periodically and kept full stocked.

The Operations Manager is responsible for ensuring availability of an adequate stock of consumable equipment and ensure all emergency equipment is being inspected, tested and maintained as necessary

4.2.1 Emergency Control Equipment

Equipment required to manage a first response for a hydro-carbon spill to water must be located at the start of each wharf. This equipment is in addition to the oil and general spill response kits strategically located within the Site workshops and yard area.

Spill response kits are located in strategic locations within the yard. These kits are held in wheeled bins, and contain materials suitable for small hydrocarbon spills on land as well as providing back up to the first response equipment listed above.

The spill kits are stationed at the following locations:

Location	Spill kit (number, size & type)
Berth 2	1 x 120 litre - Bin
Qube office building	1 x 120 litre - Bin

5. Contacts and Communication

5.1 Contacts

If any large-scale spill or emergency occurs then Call 000 if the incident presents an immediate threat to human health or property. 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**:

- Qube Ports Office - 02 4928 0513
- Fire and Rescue NSW – phone 000
- NSW Environment Protection Authority Environment Line on – 131 555
- Local Public Health Unit – (John Hunter Hospital) – 02 4921 3000
- WorkCover NSW – 13 10 50
- Newcastle Council – 02 4974 2000
- RMS – 13 77 88

5.2 Communication Systems

The means of communication during an incident will vary, depending upon the location and nature of incident. For the purposes of managing an incident, it is important to have both primary and alternate means of communications with the incident site and EOC. The following details provide an established means of internal communications during an incident.

5.3 Radios and Telephones

Radios are the main form of communication on site but in the case of an emergency the Port Authority will sound an alarm.

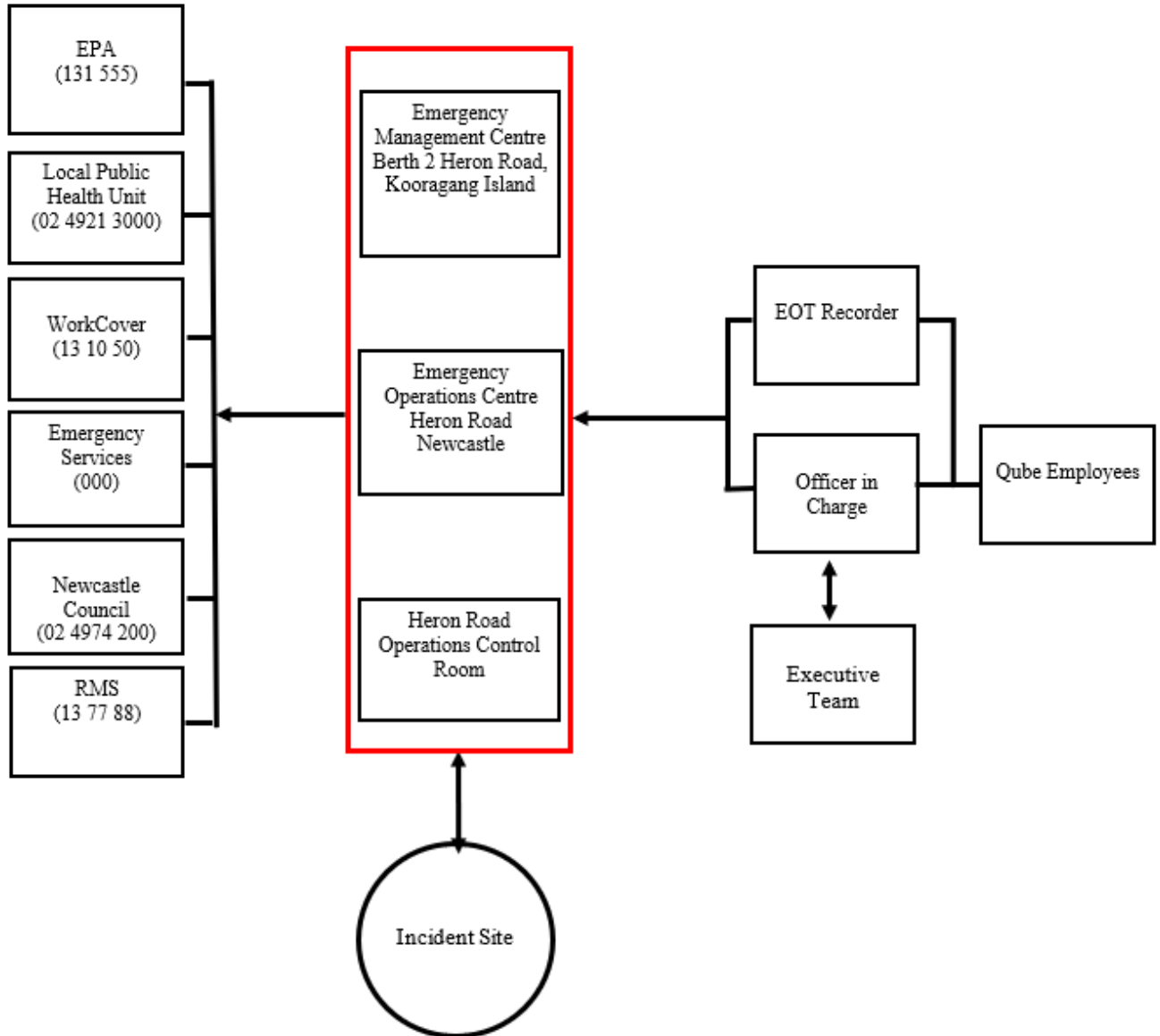
The following radio channels are used as the main communication platform at site:

- Radio channel 1 Maintenance
- Radio Channel 2 K2, K3 & Mayfield 4
- Radio Channel 3 Newcastle Agri Terminal

Mobile phone devices and fixed landlines are to be used to form part of the communication platform.

5.4 Communication Plan

The communications plan will be implemented during every significant and major incident. However, the extent to which external stakeholders will be notified of an incident will be contingent on the incident category, type and location. It must be remembered that communication is integral to the success of any incident response; therefore, all affected stakeholders must be contacted at the earliest possible opportunity. Assistance may be required in the EOC to ensure all internal/external stakeholders are contacted (e.g. any available staff to undertake phone communications).



5.5 External Notifications

Under Part 5.7, of the Act, all incidents that cause actual or potential material harm to the environment shall be reported to the relevant authority. Any employee that in conduct on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority.

Notifications to the relevant authorities shall be performed by the GM SHS Ports, NSW SHS Advisor or delegate. Any request for information that is received by any other staff should be directed to the Emergency Management Team Leader. All employees are to cooperate with any direction from the regulatory authority following a pollution incident.

5.6 Neighbours

Lot 62 & 63 Heron Road is nestled within an industrial community. In the event that an incident with an offsite impact occurs or an event that may be of concern to neighbours, the NSW Police Force and/or Fire and Rescue NSW will engage with the local community to provide information on the event. For any work that occurs outside of the normal operational parameters of the Site, neighbours are notified via written correspondence posted to their business addresses. All other routine operational work does not attract additional notification. See **Appendix A** for list of neighbours and contact details

5.7 Noise Complaints

Lot 62 & 63 Heron Road is subject to an Environmental Protection Licence. All work conducted shall be within the defined parameters. Due to the nature of works, there is noise associated with operations at the Site, however, every effort to mitigate noise shall be taken. Management will take all reasonable and practicable actions to resolve any complaints regarding operations at the Site. Concerns can be directed to **02 4928 0513**.

5.8 Emergency Operations Reporting

In the event of an incident the collection, recording and dissemination of information is essential so that accurate and up-to-date decisions can be made at all levels.

The incident log is the primary method of recording all information and action taken. For major incidents the log is kept in the EMC and for significant incidents the log is kept in the Emergency Operations Centre and completed by the person assigned with the duties of the 'recorder'.

The Operations Manager is responsible for ensuring that all incident reports and log sheets are collected following an incident. All reports are to be kept and forwarded to the Qube Ports document controller for commencement of an incident file.

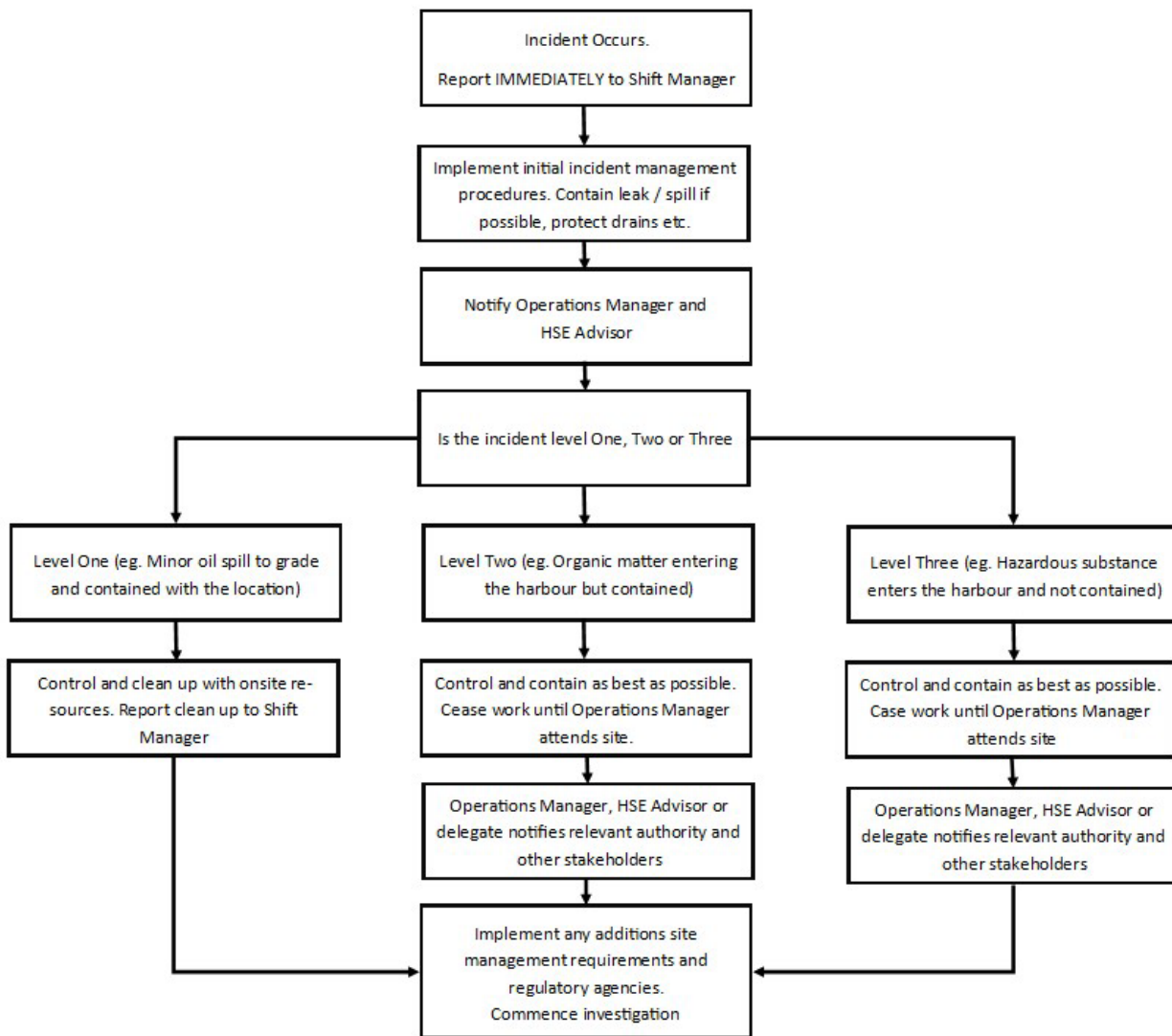
5.9 Map

The Lot 62 & 63 Heron Road Dangerous Goods Plan highlights storage locations and quantities. This is to be used as an indicative guide as to the locations and the maximum quantities that can be stored. The actual quantity on-site varies at any given time

6. Pollution Incident Response Procedure

6.1 Immediate Actions and Notifications

In the event of a pollution incident, follow response and notification procedures detailed below.



	Action	Responsibilities	Comments
1	Stop further leaks / spills.	Person causing / finding leak.	If leak from drum, reposition drum so leak is uppermost. If leak from pipe, close valve etc.
2	Inform supervisor.	Person causing / finding leak.	Stop any traffic through and isolate the area.
3	Determine severity of the leak.	Shift Manager.	For major leaks notify Operations Manager or Shift Manager
4	Form barrier / bund around leak / spill.	Shift Manager / Work Crew.	Use spill kit contents.
5	Stop the spreading of leak.	Shift Manager / Work Crew.	If possible, transfer contents from compromised storage container to alternate container.
6	Put barrier / bund around drains / outlets.	Shift Manager / Work Crew.	Barricade / bund drains and grates using sandbags etc.
7	Obtain oil spill kit and apply oil absorbent on spill.	Shift Manager / Work Crew.	Use absorbent material or equivalent.
8	Clean-up / remove absorbent material to bin.	Shift Manager / Work Crew.	Use appropriate cleaning solution to remove remaining contaminate.
9	Commence incident investigation.	Operations Manager / Shift Manager	Record incident and review procedures.

7. Declaration

I have read and understand my responsibilities as outlined in this plan.

Position	Name (print)	Signature	Date
Operations Manager	Scott Coxon		
Superintendent	Matthew Coombe		
Shift Manager	Damon Barrett		
Shift Manager	Adam Faulds		
Shift Manager	Garrett Ryan		
Shift Manager	Peter Hayes		
SHS Advisor			
Technical Training Manager	Christohpher Warriner		
Administration	Natasha Marciano		

8. Appendix A. Neighbours and Contact Details

Neighbour	Contact Details	Contact
Newcastle Council	02 4974 2000	N/A
IPL	02 4923 5454	Anthony Peters, Manager
Orica	02 4908 9329	Emergency Control room
Ameropa	0409 706 264	Jeff Cameron, Manager
KBF	0409 909 136	Malcum Muddle, Manager
Cement Australia	02 4928 2311	Peter Mayo, Team leader
Cargill	02 4928 3875	Craig Gibson, Manager
Newcastle Agri-terminal	0249 234 530	Paul Smith