Pollution Incident Response Management Plan (PIRMP)

25 GROVES AVENUE, MCGRATHS HILL

EPL LICENCE NUMBER: 3269
DANGEROUS GOODS PRODUCTION

Pollution Incident Response Management - Plan – McGraths Hill

Contents

1. Purpose

Fulton Hogan Industries Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for McGraths Hill. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at McGraths Hill and be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available on the publicly accessible Fulton Hogan website and by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the *Protection of the Environment Operations (General) Regulation 2009*.

NOTE: This plan has been developed in accordance with the *Protection of the Environment Operations Act 1997* and the *Protection of the Environment Operations (General) Regulation 2009*.

Reference has also been made to the NSW EPA's *Guideline: Pollution Incident Response Management Plans*.

2. Environment Protection Licence (EPL) Details

Table 1 Environmental Protection Licence (EPL) details

Name of licensee (including ABN)	Fulton Hogan Industries Pty Ltd 54 000 538 689
EPL number	3269
Premises name and address	McGraths Hill 25 Groves Avenue, McGraths Hill, NSW 2756
Company or business contact details	**Name:** Scott Peterson **Position or title:** Regional HSEQ Manager **Business hours contact number/s:** 02 24931 8802 / 0408 115 382 **After hours contact number/s:** 0408 115 382 **Email:** Scott.Peterson@fultonhogan.com.au
Website address	www.fultonhogan.com
Scheduled activity/activities on EPL	Chemical production
Fee based activity/activities on EPL	Dangerous goods production

3. Pollution incident – Person/s responsible

► Table 2: Persons responsible for responding to a pollution incident

TASK	PRIMARY CONTACT	SECONDARY CONTACT
PIRMP activation	**Name of person responsible**: Tim Caldwell **Position or title:** Blending Manager **Business hours contact number/s:** 0419 966 153 **After hours contact number/s:** **Email:** tim.caldwell@fultonhogan.com.au	**Name of person responsible:** Rob Howland **Position or title:** Blending Foreman **Business hours contact number/s:** 0427 269 916 **After hours contact number/s:** 0427 269 916 **Email:** rob.howland@fultonhogan.com.au
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company	**Name of person responsible:** Alan Tight **Position or title:** Regional Environment and Sustainability Manager **Business hours contact number/s:** 02 4399 9001 / 0499 777 652 **After hours contact number/s:** 0499 777 652 Email: alan.tight@fultonhogan.com.au	**Name of person responsible:** Stephen Long **Position or title:** Regional Manager **Business hours contact number/s:** 0411 219 914 **After hours contact number/s:** 0411 219 914 Email: Stephen.Long@fultonhogan.com.au
Managing response to pollution incident	**Name of person responsible:** Tim Caldwell **Position or title:** Blending Manager **Business hours contact number/s:** 0419 966 153 **After hours contact number/s:** 0419 966 153 **Email:** tim.caldwell@fultonhogan.com.au	**Name of person responsible:** Rob Howland **Position or title:** Blending Foreman **Business hours contact number/s:** 0427 269 916 **After hours contact number/s:** 0427 269 916 **Email:** rob.howland@fultonhogan.com.au

4. Notification of relevant authorities

The persons and authorities required to be notified as per Part 5.7A of the POEO Act in case of a pollution incident that causes or threatens to cause material harm to the environment are listed below:

► Table 3: Contact details for relevant authorities

AUTHORITY	CONTACT DETAILS
Fire & Rescue NSW / Rural Fire Service	**Contact number/s:** 000
Environment Protection Authority	**Contact number/s:** 131 555
Health NSW	**Relevant Area Health Service:** Nepean Blue Mountains Local Health District **Contact number/s:** (02) 4734 2022 **After hours:** (02) 4734 2000 - ask for Public Health Oncall Officer
SafeWork NSW	**Contact number/s:** 131 050
Local authority/s Identify the local authority for the area in which the premises to which the environment protection licence relates, and any area affected, or potentially affected, by the pollution.	**Relevant Local Authority:** Hawkesbury City Council (Windsor) **Contact number/s:** (02) 4560 4444
Any other identified organisation or agency requiring notification (if applicable) e.g. Water NSW, Department of Primary Industry, Roads and Maritime Services	**Organisation / Agency:** Transport for NSW (Incident Line) **Contact number/s:** 131 700
	Organisation / Agency: Transport NSW (Rail) **Contact number/s:** 131 500
	Organisation / Agency: Water NSW **Contact number/s:** 1800 061 069

5. Notification of neighbours and the local community

Owners or occupiers of premises in the vicinity of the licensed premises that are most likely to require early warnings of the incident and how they will be informed have been identified in Table 4 below.

There are no sensitive premises (e.g. schools, preschools, hospitals, nursing homes) in the vicinity of the site.

► Table 4: Contact details for neighbours and local community

OWNER / OCCUPIER	ADDRESS	INFORMED BY	CONTACT NUMBER
Hogan Engineering	31 Groves Ave, Mulgrave NSW 2756	Door knock, phone call	(02) 4587 8899
Western Precast	63-73 Railway Rd N, Mulgrave NSW 2756	Door knock, phone call	(02) 4577 5844
Business Complex	21 Groves Avenue	Door knock	N/A

Regular updates will also be provided via the Hawkesbury City Council Emergency Dashboard, social media networks and letterbox drops as required.

Refer to Section 10 of this plan for further information.

6. Description and likelihood of hazards

Identifying environmental aspects and impacts provides a comprehensive understanding of actual and potential hazards to human health or the environment associated with the activity to which this licence relates. This process also includes the assessment of the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood in accordance with the company's Manage Risk and Opportunity and Develop Environmental Risk Assessment (ERA) processes.

The Environmental Risk Assessment in Appendix 2 documents this process.

7. Pre-emptive actions to be taken

Pre-emptive measures focus on the carrying out of site activities in a controlled manner, taking into account environmental risks, to prevent pollution incidents from occurring on the site. This includes measures such as works planning, implementation and compliance with the McGraths Hill Environmental Management Plan (EMP) and an inspection and maintenance regime.

Additional pre-emptive measures for high risk activities include proper and adequate storage of materials and hazardous substances including adequate bunding and dust suppression. Detailed Safe Work Method Statements are prepared to identify specific risks, including environmental risks, and develop task specific actions and controls to prevent incidents and ensure compliance. Measures and controls are also detailed in the site Environmental Risk Assessment (Appendix 16.3). The pollution incident flowchart included in Appendix 16.5 should be made available on-site so all staff are aware of basic reporting parameters.

In the event of an environmental incident, the Manage Incident Response, Notification & Investigation process is followed, involving consultation and communication, identification and assessment, implementation of controls and revision and management of the incident.

8. Inventory of pollutants

Pollutants for the site were identified and incorporated into the risk assessment described in Section 6 of this plan.

A pollutant inventory has been developed for the site and includes details of chemicals and fuels likely to be stored and used during operations, including the approximate volume and the location of storage.

The Pollutant Inventory is included in Appendix 16.4.

9. Safety equipment

Personal protective equipment (PPE) suitable for handling and using chemicals on the site are maintained on site along with the relevant Safety Data Sheets (SDS) information for each chemical to be stored on the site.

Equipment stored and available for use in the handling of chemicals includes:

- Bitumen PPE (as per the Fulton Hogan Bitumen Product Handling PPE Standard)
- rubber gloves;
- respirators;
- goggles;
- tyvek suits; and
- fire extinguishers

The PPE and equipment required for handling each individual chemical can be found on the specific SDS for that chemical.

Spill kits are located strategically on the site near high-risk activities. Spill kits are checked and serviced internally on a six monthly basis and are also checked as part of workplace inspections and audits. These kits are designed for immediate containment and management of pollution incidents and, as a minimum, are stocked with the following material;

- absorbent mats;
- absorbent floor sweep material;
- floating booms to control spills in water; and
- disposal bags.

10. Communicating with neighbours and the local community

10.1. Stakeholder Notification

The process in determining community notification requirements depends on the type, intensity and potential of impact to the community. Community stakeholder notification is required for incidents or events on the site which:

- will result in an unacceptable impact to community stakeholders during the incident (where community stakeholders are present e.g. residing in their houses or using adjacent motorways at the time of the incident).
- will result in an unacceptable impact to a community area that is to be used by community members in the days and weeks following the incident. These community stakeholders may not be present during the incident but might be present in the following days.

An unacceptable impact is defined as one which has the potential adversely affect the health of a member of the community. This takes into consideration immediate health impacts (that occur during the incident) and health risks in the period following the incident.

The Environment Manager in consultation with the Department Manager will make the above determination and trigger the stakeholder notification process.

It is likely that during the notification process, the incident will likely be under the control of emergency services personnel. In such an event the Environmental Manager and Department Manager will provide all the necessary assistance to the incident controller including to the provision of access to the details of this plan.

10.2. Community Stakeholder Notification Process

The process for notification of stakeholders relates directly to the nature of the hazard. If there is an unacceptable risk to the community from the pollution incident, the identified community will be notified.

In this event, community stakeholders will be contacted either face to face or by telephone to advise the stakeholder of the incident with recommended actions (that the community stakeholder can take to prevent or minimise harm) (for example close windows, evacuate buildings, not to drink or swim in watercourses etc.).

Further follow up communications will be undertaken as directed by the Environment Manager. This may include but not be limited to:

- further face to face/telephone contact;
- letterbox drops;
- email;
- update to company website;
- use of technology such as Variable Message/Motorway signage and Radio communications.
- use of social media networks
- reporting through the Hawkesbury City Council Emergency Dashboard

The site team will use a combination of the above mechanisms to ensure that relevant community messages are quickly and effectively distributed amongst the affected community.

10.3. Intervention by an Emergency Service

If the incident is unable to be contained or managed in a safe manner using the available resources on site and intervention by an Emergency Service is required (e.g. Fire and Rescue Services), the relevant emergency service will direct and control the response to the incident, including any planned evacuation or rescue of any community stakeholders.

This plan will maintain the contact details of receivers (where available) and will show the location of the premises, the environmentally sensitive areas and the types of environmental controls that are in place. Refer to Appendix 16.1.

11. Minimising harm to persons on the premises

Safe Work Method Statements and toolbox talks relating to harm minimisation will be implemented for the site to minimise harm to the workforce.

These tools detail how activities are to be undertaken and the processes around these activities. They include specifics about the handling and management of any hazardous substances associated with the activities undertaken. For significant incidents relating to hazardous materials management controls are referenced under the site Safety Plan.

A summary of the process to minimise harm to personnel and the community are provided below. The Department Manager directs available site resources (labour, equipment, materials) to prevent and mitigate harm to persons on the premises.

This includes (but is not limited to):

- induction procedures;
- evacuation procedures;
- clearly signed muster points; and
- activating audible and/or visible warning alarms.

Plans include actions or arrangements that will be put in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premises should an incident occur. Access to a range of expert consultants is also available to provide expert medical, toxicology or environmental impact advice. Their contact telephone numbers are below (Table 5).

▶ Table 5: Contact details for experts available for consultation

EXPERT AREA	NAME	TELEPHONE
Emergency	Emergency Services	000
Public Health	NSW Public Health Unit (Nepean)	(02) 4734 2022 or (02) 4734 2000 (After Hours)
Medical	Nepean Hospital	(02) 4734 2000
Toxicology	Poisons Information hotline	13 11 26
Environment	Scott Peterson (HSEQ Manager)	0408 115 382
Bitumen Burns	Concord Hospital	(02) 9767 7776

12. Actions to be taken during or immediately after a pollution incident

In the event of a pollution incident the Department Manager in consultation with the Regional Environment Manager will take the lead on management of the pollution incident in reference to the relevant Fulton Hogan incident and emergency response flowchart. The Department Manager will be supported by the Regional Manager who will make available the required resources to accomplish identified tasks. Resources may include labour, excavators or liquid waste vacuum trucks etc.

Immediately following the pollution incident, waste will be appropriately disposed of either using resources onsite or employing subcontractors where necessary. During clean-up, documentation of quantities and a description of waste will be recorded.

The Regional Environment Manager will conduct an investigation into the incident to identify the root causes and preventative actions that can be implemented to ensure that the incident does not re-occur.

13. Coordinating with persons

The procedures to be followed for coordinating with the authorities or persons who have been notified is illustrated in the Pollution incident Management Flowchart in Appendix 16.5.

Post incident all communications are to be made through the Environment Manager or General Manager. The General Manager may delegate this responsibility to the Regional Manager as appropriate.

ROLE	PIRMP RESPONSIBILITY	NAME	TELEPHONE
General Manager	Responsible for state wide management post incident	Jason Hourigan	0418 722 916
Regional Manager	Responsible for state wide management post incident if delegated by GM	Stephen Long	0411 219 914
Department Manager	First Contact – Responsible for coordinating on-site management and liaise with Environmental Manager.	Tim Caldwell	0419 966 153
HSEQ Manager	First Contact – Responsible for liaising with personnel at pollution site and providing guidance to the team to minimise environmental impact. Inform appropriate agencies and service providers in the event of a notifiable incident. Responsible for contacting local Community Services / Parties as required.	Scott Peterson	0408 115 382

14. Staff training

To ensure that the PIRMP is implemented effectively in the event of an incident, training will be provided to personnel involved in the implementation of the PIRMP.

The training will include:

- identification of the notification protocol;
- identification of the incident response equipment and its location; and
- training in the procedures for emergency response.

The principles around the training for the PIRMP are:

- prevention/mitigation activities: Provide training to assist in eliminating or reducing the impact of hazards;
- preparedness activities, which establish arrangements and plans to deal effectively with incidents on the site; and
- response activities, which activate arrangements and plans to deal with incidents and emergencies if they occur.

A register of personnel trained under the PIRMP will be maintained in PDP AU and updated regularly (at least annually) following the review of the PIRMP. Staff responsible under the PIRMP will be trained on an annual basis (as a minimum).

Appendix 16.5 attached is a condensed site ready flowchart detailing the required response from a pollution incident. This flowchart should be made available around the site, but should always be presented in connection with this PIRMP.

15. Testing and updating of the PIRMP

It is a legal requirement to test this plan every 12 months and within one (1) month of any pollution incident. Testing of the PIRMP will be included in the site Incident and Emergency Response Drill Schedule.

The PIRMP is to be tested through a mock exercise or a desktop simulation which covers all components of the plan. This process will confirm that the information included in the PIRMP is accurate and up to date and that the plan is capable of being implemented in a workable and effective manner.

The testing must be documented and recorded in accordance with the Fulton Hogan Conduct Emergency Response Drills process. An Incident and Emergency Response Drill Record must be completed and include the testing date and the names of all staff members who carried out the testing.

The PIRMP must be reviewed at least annually. The plan must be uploaded to theHub and include the following information in the revision comments:

- Reason for the update (e.g. address issues identified in testing, contact details/personnel have changed)
- Details of update (nature of changes to PIRMP)

Once the updated PIRMP has been published on theHub, the updated version must be sent to the Group Communications Manager for upload to the Fulton Hogan website (www.fultonhogan.com).

16. Appendices

16.1. Location and Surrounding Area Map

Figure 1 Location of the premises to which the licence relates and surrounding area likely to be affected by a pollution incident

16.2. Stormwater and Discharge Point Map

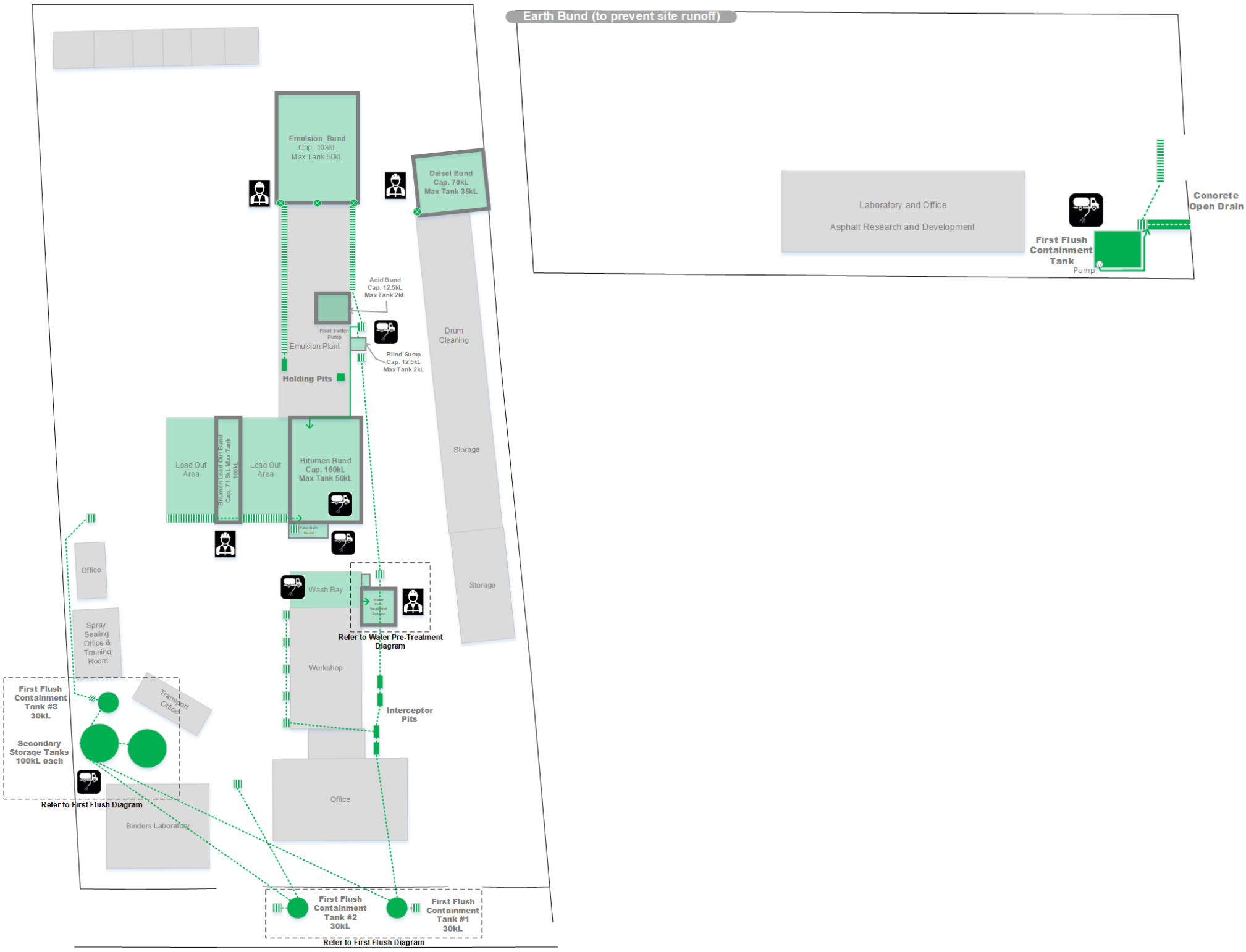
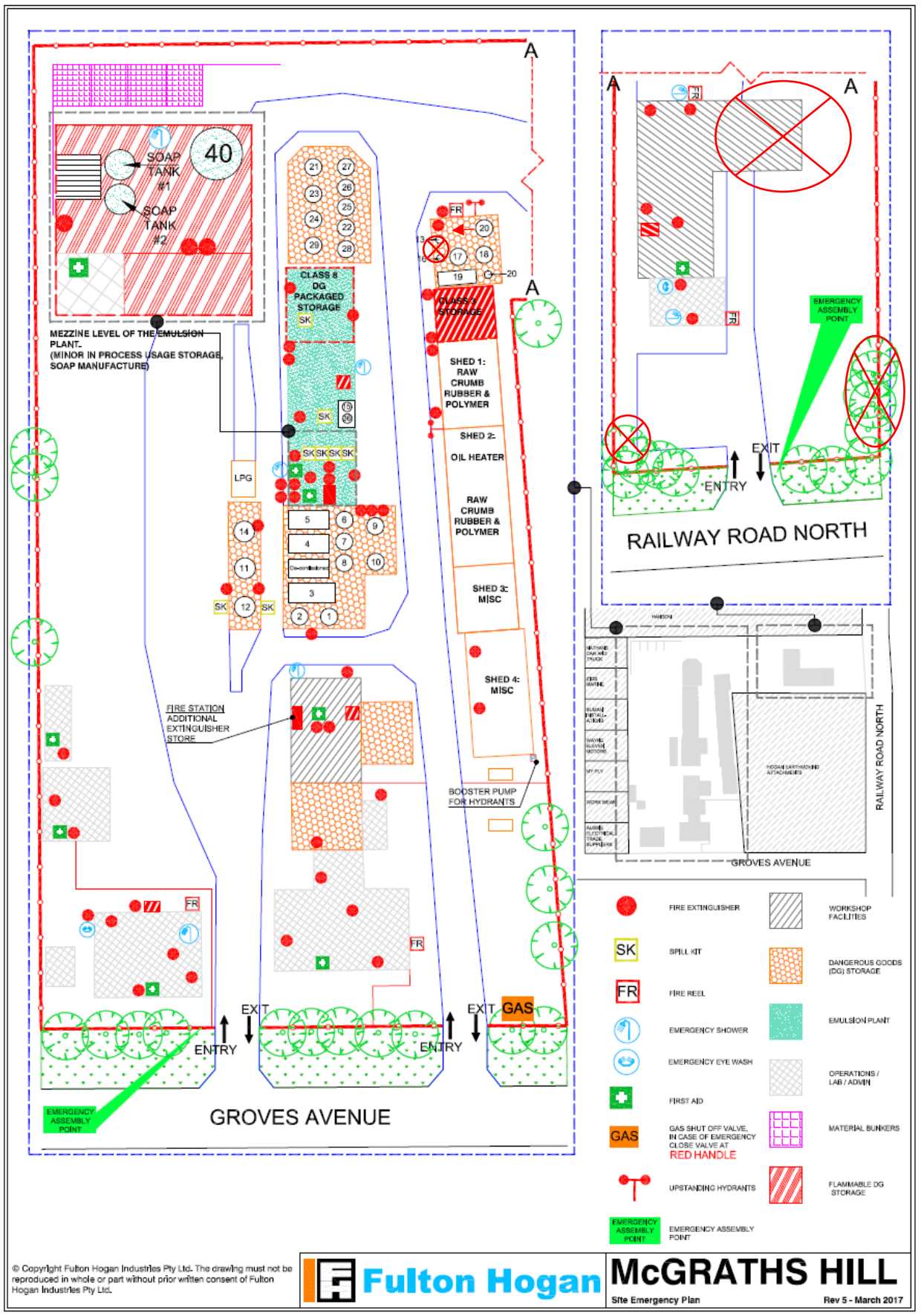


Figure 2: Location of stormwater drains on the premises including discharge point

16.3. Environmental Risk Assessment

16.4. Inventory of Pollutants



Tank	Pollutant	Vol (kL)	Tank	Pollutant	Vol (kL)	Tank	Pollutant	Vol (kL)
1	C170 Bitumen	50	12	Empty	0	25	Emulsion	50
2	Blend Oil	50	14	S45R Bitumen	35	26	Empty	0
3	Blend Oil	35	Soap Tank 1		5	27	Emulsion	50
4	C170 Bitumen	35	Soap Tank 2		3.5	39	Water	10
5	C170 Bitumen	35	40	Water	1	20	Diesel	4
6	C170 Bitumen	43	15	Diesel	5	13	Offgrade Emulsion	30
7	PMB Storage	50	18	Precoat Slops	35	16	Offgrade Emulsion	20
8	PMB Storage	50	21	Emulsion	50	17	Empty	0
9	PMB Mixing	14	21	Emulsion	22	19	Mexcut	16
10	PMB Storage	14	23	Emulsion	50	36	Hydrochloric Acid	2.35
11	C170 Bitumen	100	24	Emulsion	50	LPG		4.5

16.5. Pollution Incident Management Flowchart