



SUPAGAS
YES WE CAN!

SUPAGAS PTY LTD

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

SITE:

Supagas PTY Ltd

Bomaderry Carbon Dioxide Plant

220A Bolong Rd,

Bomaderry NSW, 2541

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LIST OF EMERGENCY PROCEDURES

Major Incident (MI)

Level 1 Incident

Activation of an alarm

Level 2 Incident

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1 INTRODUCTION

1.1 Background

This Pollution Incident Response Management Plan (PIRMP) has been prepared for Supagas Pty Ltd CO2 Plant in Bomaderry (NSW). The facility at 220A Bolong Rd, Bomaderry NSW 2541 is used for the purification liquefaction and distribution of Carbon Dioxide.

The contents of this document are to be read and understood by all Supagas personnel at the Bomaderry site. It is a requirement that all those with emergency responsibilities as defined in this plan to have a copy of this PIRMP, and receive the appropriate level of training needed to allow sufficient response to the incidents identified in this PIRMP.

The guidelines in this document are simple, but if you are in doubt about any aspect of safety or procedures you must consult the company supervisor in charge immediately.

This Pollution Incident Management Response Plan fulfils the requirements of the EPA, which calls upon the PIRMP to be prepared in accordance with the Protection of the Environment Operations Act 1997.

1.2 Aim of the Emergency Response Plan

The purpose of this document is to:

- provide a clear understanding of how to handle and react to any pollution incident in the storage facility;
- prevent or minimise the impact of a pollution incident; and
- Facilitate a return to normal operations as soon as possible.

1.3 Definition of a Pollution Incident

A pollution incident is defined as 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. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

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2 OBJECTIVES

2.1 Purpose

The purpose of the PIRMP is to prevent or minimise the impact of a pollution incident and to facilitate a return to normal operations as soon as possible, by providing effective:

- Pollution Incident Management;
- Training; and
- Updating and reviewing of the pollution incident procedures.

2.2 Objectives

This PIRMP provides guidance on response actions to be taken in a pollution incident which occurs within the Supagas facility limits to minimise the potential for loss of life, injury to people, damage to the environment, and damage to property.

The objectives of the PIRMP are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the relevant authorities specified in the Act and people outside the facility who may be affected by the impacts of the pollution incident
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability

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3 BRIEF SITE DESCRIPTION

Figure 3.1 shows the site location of the Supagas facility at Bomaderry. The site layout is shown in Figure 3.2 which includes the location potential pollutants and stormwater drains. The stormwater drains are connected to Sydney Water’s stormwater network.

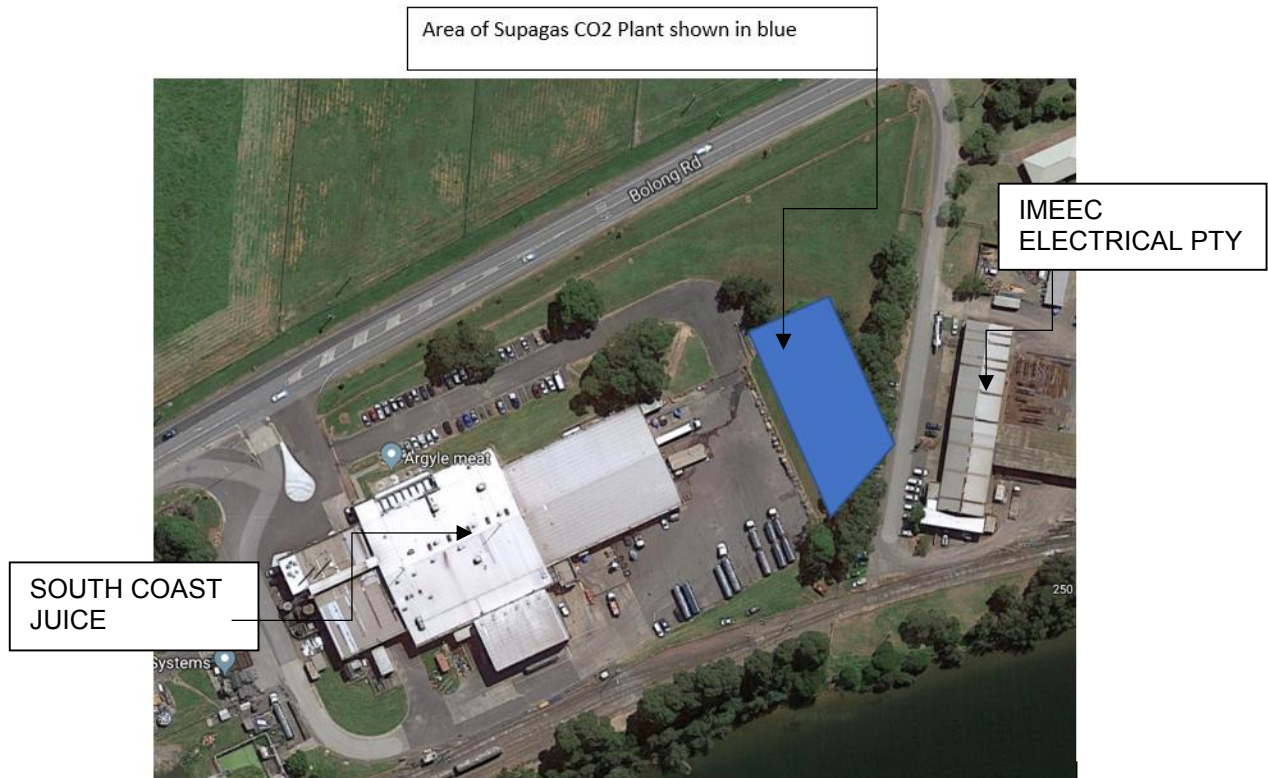
3.1 Neighbouring businesses

The businesses adjacent to the Supagas site are:

- North – N/A.
- South – N/A
- East – Electrical Contractors (IMEEC)
- West – South Coast Juice

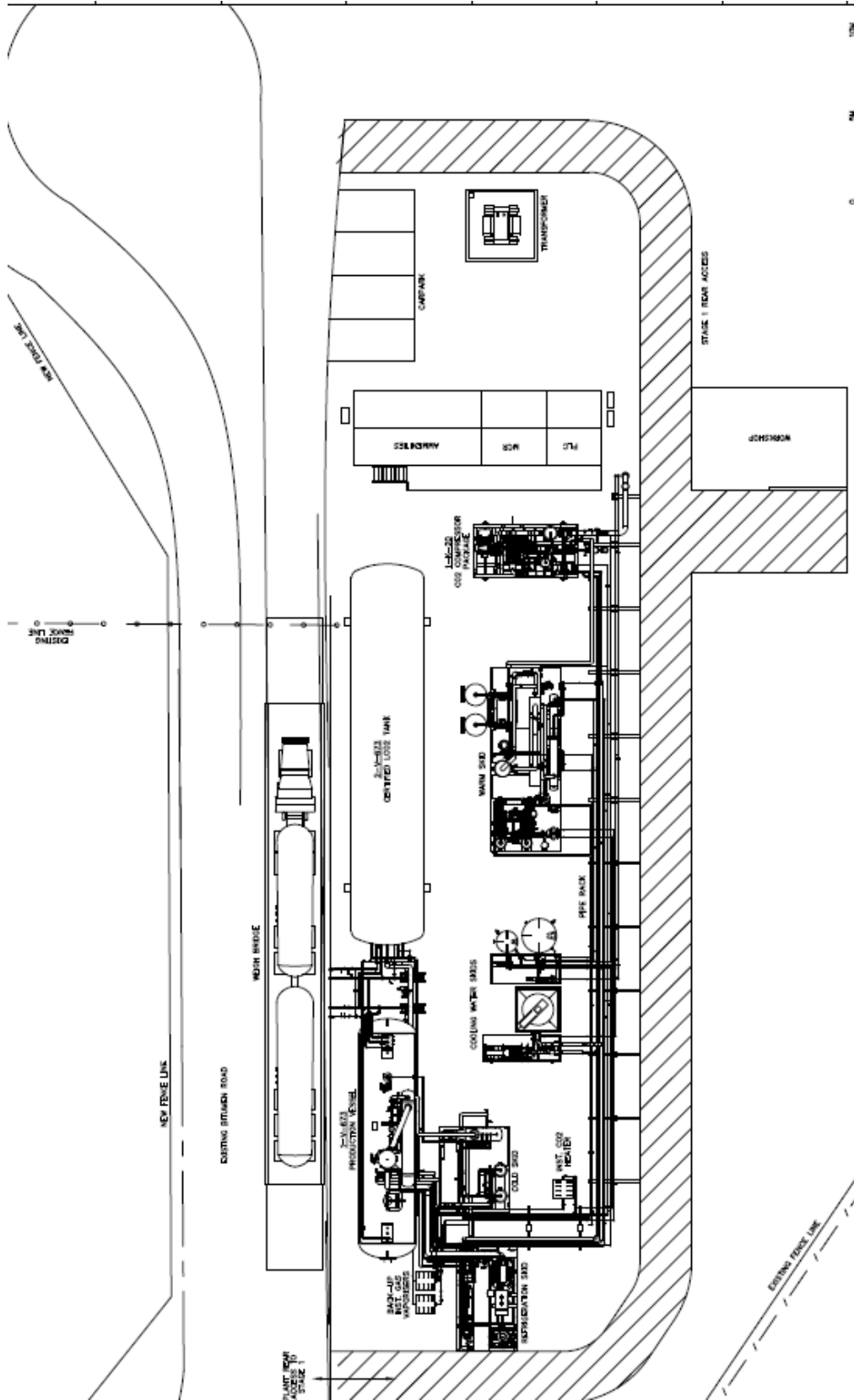
3.2 The Site

**FIGURE 3.1
SITE LOCATION OF THE SUPAGAS CARBON DIOXIDE PLANT
BOMADERRY**



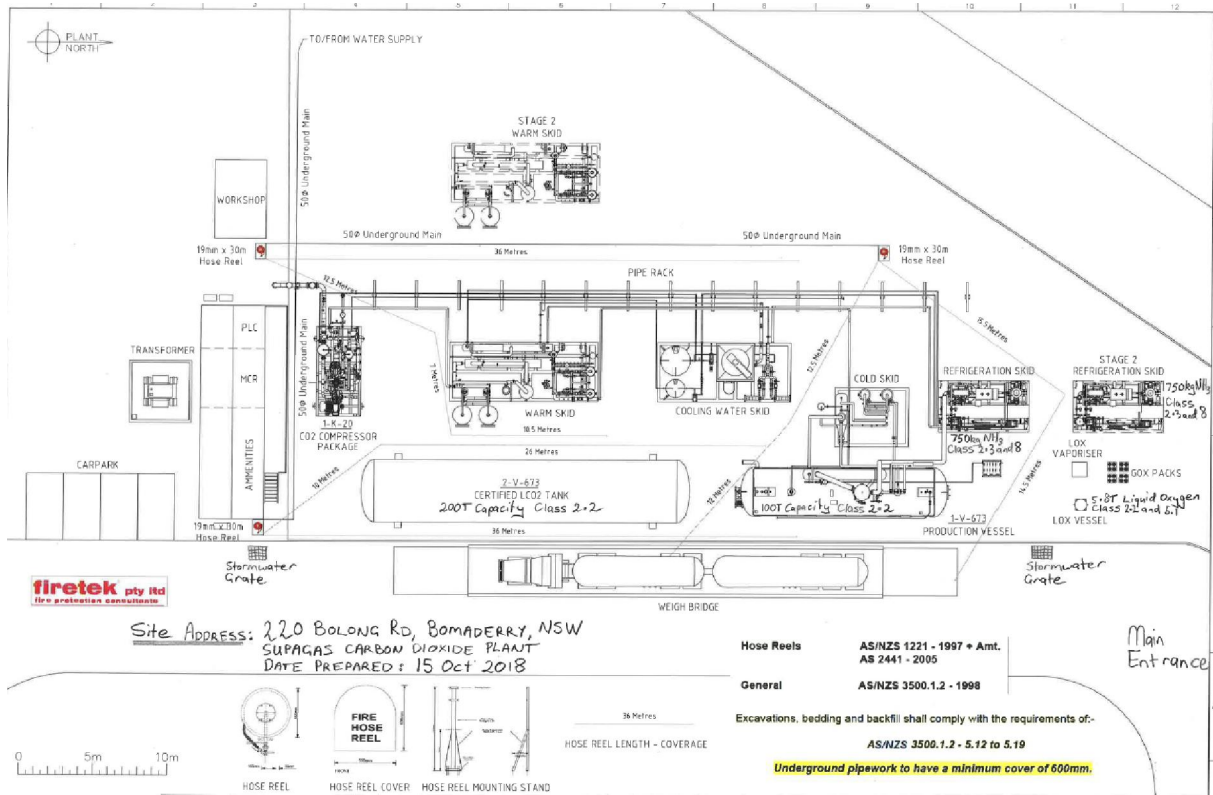
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FIGURE 3.2
SUPAGAS SITE MAP



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DANGEROUS GOODS MAP



3.3 Potential Pollutants Stored on Site

The chemicals that are present on site which have the potential of harming the environment are Monoethanolamine (MEA), Potassium Permanganate, Soda Ash, Copper Carbonate, and Antifoam. Basic health information and storage quantities are in the table below. Detailed SDS are available on our website or by request.

**TABLE 3.4
 POTENTIAL POLLUTANTS STORED AT THE SUPAGAS FACILITY, at 220A Bolong Road Bomaderry**

Chemical	Health hazard information	Maximum quantity on site
Carbon Dioxide Liquide	Corrosive - avoid contact with skin and eyes, do not inhale or ingest	300,000kg
Ammonia	Causes irritation to skin and eyes, do not inhale or ingest	1,500kg
Gaseous Oxygen	Causes irritation to skin and eyes, do not inhale or ingest	1,000kg

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4 TYPES OF EMERGENCY RESPONSE AND STRUCTURE

A PIRMP shall be co-ordinated by the Branch Manager. This shall include establishing and implementing the PIRMP, ensuring that personnel are familiar with the plan, arranging for their training, arranging to conduct simulated incident exercises, reviewing the effectiveness of the exercises, and arranging for procedural improvements.

4.1 Emergency Command Structure General Notes

4.1.1 Immediate Response and Alarm Initiation

Any person discovering a pollution incident or a situation, which is likely to give rise to a pollution incident, shall:

- **Consider** containing the situation alone.
- **Contain** it only if safe to do so.
- **Alarm** - raise the alarm by contacting the branch manager who shall decide on the level of the pollution incident and details of the emergency.
- **Rescue** - assist or alert persons in immediate danger.
- **Notify** the relevant authorities, neighbours and community if the pollution incident was unable to be wholly contained on site.

If in doubt, the alarm shall be activated first and then the doubt will be clarified.

4.2 Principle Roles and Responsibilities

It will necessary for personnel to be allocated key emergency response duties. Key positions and duties are listed below. **Appendix A** gives a summary of the roles and responsibilities of key personnel in emergency response positions on site.

4.2.1 Site Emergency Commander

The Site Emergency Commander (SEC) will be the National Operations Manager. The SEC will take responsibility for control of pollution incidents. If the SEC cannot be located, notify one of the SEC's deputies:

1. Emergency Co-ordinator (Site Manager)
2. Deputy Emergency Co-ordinator (Site Operations)
3. Logistics Controller
4. Training Manager

4.2.2 Restoration Team

A restoration team will be established by the National Operations Manager to firstly establish site operations based on the scale of the incident. The restoration team shall be responsible for establishing a recovery plan and all further actions required until the resumption of business operations. The restoration team will be headed by the Site Manager.

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4.2.3 Communications

Internal

The National Compliance Manager – LPG is nominated as the communications officer. It will be his/her task to monitor communication and facilitate the effective exchange of information between the site and the relevant authorities.

External

The Managing Director is the only person responsible for relaying information to the media and other public bodies. Staff will be instructed not to discuss issues with any persons outside the site as this is the role of the Managing Director only. In his absence, the Chairman has this responsibility.

When a significant incident occurs, a media statement should be prepared as quickly as possible, and include:

- A description of the nature of the emergency;
- The corrective action taken, and its effectiveness;
- When the emergency is expected to be over;
- The investigative action that is to be taken; and
- Any assistance that can be given by the media.

Only facts should be stated. Statements as to the cause and effects of the emergency should be avoided until a thorough investigation has been conducted.

4.2.4 Emergency Response Personnel

Rescue and First Aid

Selected site staff will be trained in first aid. It will be their task to render assistance in removing any injured staff from the emergency area and to provide effective management of injuries until the SES (ambulance) arrives. Lists of trained first aid officers are on site notice boards.

Evacuation

Evacuation will be controlled by the Site Emergency Commander (SEC). He/she will direct staff to evacuate the site should the pollution incident grow beyond manageable proportions. A site staff member will be delegated to facilitate the evacuation and ensure all staff has left the area to be evacuated. This staff member will report to the SEC when evacuation has been completed.

Traffic Control

A traffic control officer (emergency response personnel) will be nominated by the SEC. It will be this person's task to ensure the free flow of traffic in the areas immediately off-site. The task will also involve the removal of any vehicle that may obstruct the free flow of SES in and out of the site.

4.3 Principles of Pollution Incident Response

The principles of response will be based on prevention, containment, rescue and first aid. These have been summarised below:

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Prevention

- Maintenance and testing of all detection and protection equipment on a regular basis
- Inspection of all plant and storage facilities on a regular basis
- Regular emergency response drills to ensure site readiness
- Procedures and training

Containment

- Switch off any operating equipment
- Isolate electrical supplies at the main switchboard
- Take any operating equipment (e.g. forklifts) outside the warehouse
- Co-ordinate with Site Emergency Commander

Rescue

- Trained personnel only
- Approved safety clothing to be worn. NOTE: All rescue equipment will be located in lockers at specific location around the plant
- Approved and trained rescue crews only to respond

First Aid

- First aid is to be given only by trained first aid officers

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EVACUATION

4.4 Evacuation of Personnel Located Onsite

The order to evacuate the site shall be issued by the Site Emergency Commander (SEC) or the responsible emergency service.

- All personnel are to move quickly to assembly areas
- Staff are to warn others as they go.
- Fire Wardens conduct a two-sweep pass of the site to ensure the site is clear.
- Do not move or leave assembly area without permission from the SEC or responsible emergency service unless the area is under direct threat.
- Priority that must be observed during a building evacuation are:
 - Those that are able to walk without assistance leave first;
 - Those who require some assistance leave next; and
 - Those who must be carried leave last.

Mobility impaired persons should be assembled in a safe area away from immediate danger.

4.5 Evacuation of Personnel Located Offsite (adjacent properties)

In the event that an incident grows to proportions that adjoining sites may be affected, it will be necessary to contact the management of these sites and facilitate evacuation. The contract numbers for each of the adjoining sites is given in **Table 6.1**. Note that the industrial complex manager has also been included on this list as well as the industrial complex security team.

**TABLE 6.1
LIST OF CONTACTS - NEIGHBOURING SITES**

Site	Location	Contact No.	Contact Person
North	N/A		
East: IMMEEC	220 Bolong Rd Road	02 44216266	Travis Buchan
South	N/A		
West: South Coast Juice	36 Bolong Rd	0481093083	James

5 SAFETY EQUIPMENT

Equipment has been installed around the site for use in response to emergencies. It shall be maintained and accessible for immediate use, and its location appropriately sign posted. The range of equipment installed at the Supagas facility includes the following:

- Operator daily checks
- Routine maintenance of vessels and equipment
- SDS – Safety Data Sheets

In the event of a spill, the following Personal Protective Equipment (PPE) is available for the clean-up process:

- Chemical gloves
- Full face mask (ammonia)
- Personal gas monitors
- Safety glasses

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6 NOTIFICATION OF INCIDENT TO AUTHORITIES AND ADJACENT BUSINESSES

6.1 Relevant Authorities

If a pollution incident should occur, **all** relevant authorities need to be contacted. Contact details for each of the relevant authorities are listed below:

- EPA 13 15 55
- SafeWork NSW 13 10 50
- Fire and Rescue 1300 729 579
- Ministry of Health 9391 9000
- Shoalhaven Water 02 44213100
- Shoalhaven Council 02 44293111

6.2 Neighbours and local community

In the event of a pollution incident, anyone that may be affected must be notified immediately. This may include neighbouring business as well as people downstream of the stormwater outlets.

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7 POLLUTION INCIDENT RESPONSE PROCEDURES – SPECIFIC EMERGENCIES

7.1 General

In many industries, safe and efficient operation depends upon the observance of basic safety principles, which have been developed through experience, and careful analysis of the nature of potential hazards associated with the processes carried out at a site.

In any pollution incident that arises, clear and explicit communications are essential to maintain control. All Supagas staff are expected to maintain a thorough knowledge of pollution incident procedures and therefore there should be no need for reference to this material during the actual emergency. Supagas Safe Operating and Quality Procedures must also be followed; these are part of the general operating procedures and Quality Assurance procedures.

7.2 Contact Details

The telephone numbers, which should be used in a pollution incident, as appropriate, are listed in **Appendix A**.

7.3 Emergency Procedures

This section details the responses to specific emergencies as listed below. Emergency Contacts are given in **Figure 6.1**.

Subject	Emergency Procedure No.
Major Incident (MI)	Level 1 Incident
Activation of an alarm	Level 2 Incident

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ERP-01: CHEMICAL SPILL

1.0 Level 1 Incident

In the event of a LEVEL 1 INCIDENT Major Incident (MI) the alarm will be raised by either one or both methods,

- The alarm is raised by a Supagas Employee
- The police or Emergency Services personnel contact Supagas directly

This may include the following incidents:

- Tanker transfer (Loss of containment)
- Ammonia (Loss of containment)
- Gaseous Oxygen (Loss of containment)
- Vehicle impact to facility

2.0 Level 2 Incident

It may be unnecessary for the ERT will be assembled for a LEVEL 2 INCIDENT.

Activation of an alarm will automatically activate the Emergency Response Plan which will result in a response by the Supagas “Emergency Response Team” (ERT).

Notification to Emergency Services;

Call “ 000” for Police, Fire or Ambulance

Emergency Response Level 2 incidents are more likely to be product specific therefore we have provided generic initial response guidance per product and Dangerous good class refer to table below;

Generic Incident Table

Incident	Measures Taken to Control or Limit the Consequences	Protective Resources	Emergency Services Action	Response Procedure
Ammonia Leak - flammable vapor toxic and asphyxiant	Emergency stops, isolation valves. Large leak – Evacuate upwind – Activate this plan	Hose reels	Small leaks - Disperse vapors with water spray. Isolate if safe. Gases can collect in pits and drains. Fog to Disperse.	Leak of class 2.3 substance
Bulk Liquid CO ₂ – Liquid leak, asphyxiant	Emergency stops , isolation valves Large leak – Evacuate upwind – Activate this plan	Hose reels	Disperse vapors with water spray. Isolate if safe. Gases can collect in pits and drains. Fog to Disperse.	Leak of class 2.2 substance
Bulk Liquid Nitrogen & Argon – major spill. Intense cold. Dense vapour, Asphyxiant.	Natural Ventilation, determine direction of cloud.	Hose reels Large tanks outdoors gas will disperse to atmosphere	Disperse spill with water spray. Form ice dams to direct spill.	Leak of cryogenic liquids Classes 2.2
Compressed Nitrogen, Argon, CO ₂ – gas leak. Intense cold. Vapour cloud asphyxiant.	Natural Ventilation, determine direction of cloud.	Hose reels Most cases allow cylinder to expire, gas will disperse to atmosphere.	If required disperse gas leak with water spray.	Leak of compressed cylinders Classes 2.2

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Compressed Oxygen	Safety circuit on individual cylinders.	Hydrants/ hose reels	Fog cylinders from a safe distance	Leak of class 2.2/5.1
Compressed Hydrogen – leak of flammable gas. Invisible flame is likely if gas ignited.	Emergency Stops, Natural Ventilation.	Hydrants / hose reels	Disperse with water spray if required. Caution: flame may be invisible	Leak of class 2.1 substance
Acetylene – leak of flammable gas	Emergency Stops, Commence firefighting methods, flood with water or foam.	Hydrants / hose reels	Standby	Leak of class 2.1 substance

FIRST AID RESPONSE (MUST ONLY BE CONDUCTED IN A SAFE, CLEAN AND SECURE POSITION)	
Exposure /Incident	First Aid Response
CO ₂ Liquid cold burn.	<p><u>Minor Burn</u> Flood irrigate the area for 15mins with tepid water for small areas. Continue irrigation in intervals until cooling has been achieved. Should blistering be evident seek medical advice for treatment and wound hygiene.</p> <p><u>Moderate Burn</u> If the burn area is large, cover affected area with a bandage/sterile patch and continue to irrigate. Notify “000”, ambulance. Sit the patient (if practical) in a shaded/cool area, continue to irrigate in intervals until the ambulance attends. Monitor condition for signs of shock. Do not allow food, or drink until advised. Handover to emergency services.</p>
Compressed cold burn.	As per above
Ammonia exposure.	<p>Inhalation: Remove victim from area of exposure - avoid becoming a casualty. Remove contaminated clothing and loosen remaining clothing. Allow patient to assume most comfortable position and keep warm. Keep at rest until fully recovered. If patient finds breathing difficult and develops a bluish discoloration of the skin (which suggests a lack of oxygen in the blood - cyanosis), ensure airways are clear of any obstruction and have a qualified person give oxygen through a face mask. Apply artificial respiration if patient is not breathing. Seek immediate medical advice.</p> <p>Skin Contact: If spilt on large areas of skin or hair, immediately drench with running water and remove clothing. Continue to wash skin and hair with plenty of water (and soap if material is insoluble) until advised to stop by the Poisons Information Centre or a doctor. For freeze burns, immediately flood burnt area with large amounts of luke-warm water and cover with a clean, dry dressing. Do not use hot water. Seek immediate medical assistance.</p>
Offsite Impact	
Exposure /Incident	Response
Gas Spills, vapour,	<p><u>Minor</u> Monitor and assess for further action. Provide regular updates to the other team members, close off all doors and windows. Stay indoors and await instruction for all clear.</p> <p><u>Moderate – Major</u> Activated emergency plan, depress E-Stop, call “000”, commence evacuation to assembly area, if safe to do so, Notify neighbors of leak and advise them to stay indoors until advised.</p>
Environmental risk	No chemical to ground, use booms or absorbent pads to soak any spill or leak. Do not allow any liquids to drains or soils. Seek remediation advice.
Manildra Ethanol plant fire / explosion	Activate emergency plan, depress E-Stop, call “000” and seek advice if available , commence evacuation to assembly area. Should this area be downwind, relocate all personnel to a remote upwind location. Should smoke be impeding visibility take extra caution for motor vehicles, move upwind out of smoke plume.

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Smoke.	On the sighting of smoke in the immediate area. Activate emergency plan, depress E-Stop, call "000" and seek advice if available, commence evacuation to assembly area. Should this area be downwind, relocate all personnel to a remote upwind location. Should smoke be impeding visibility take extra caution for motor vehicles, move upwind out of smoke plume.
Bush Fire threat	<p>Activated emergency plan, depress E-Stop, call "000"</p> <p>Immediate Risk In the event of an immediate bush fire event, use hoses to wet the immediate grasses surrounding the facility if possible, if at risk do not undertake this task (Do not leave hoses running , as this will deplete local firefighting water pressures) Account for all staff and Evacuate with sufficient time to seek refuse or cover in a vehicle in a built-up area. <u>Do not leave at the last minute as smoke may impeded your vision to drive. Plan your escape upwind.</u> Remain in area to provide subject matter advice if requested by authorities.</p> <p>Approaching Risk (Site has time to prepare) In the event of an approaching fire. Team brief this plan and account for all staff who are remaining on site to perform tasks. Commence shutting down the facility, activate estop to shut off gas supply, turn site power off, remove all vehicles, close shed doors and remove waste bin to a protected area (behind a building, downwind). Unlock all gates and pin open for emergency service access and safe exit Commence hosing of buildings to wet gutters, douse general site surrounds. Check wind conditions for ember attack, use bucket and mop , hose etc On the approaching fire face, wet grasses and shrubs and cylinders . Account for the team members, maintain a visual at all times Continue to douse boundary, apply a second douse to buildings . Either on orders of Fire authority or staff member, account for all remaining staff then issue orders to evacuate, leave scene well in advance of fire front or heavy smoke approaching. <u>Your fire strategy is to preserve life , evacuate the team to a safe area .</u> Remain in area to provide subject matter advice if requested by authorities.</p>

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8 TERMINATING AN EMERGENCY

When the Emergency Services Commander’s role is complete, he/she will hand back control to the Site Emergency Commander.

The Site Emergency Commander should carefully consider the overall situation and review the following

- Re-organisation of staff
- Re-construction of damaged equipment
- Clean-up, safe storage and disposal of all contaminated material
- Complete relevant paperwork
- Review of incident and procedures to see if procedures are correct.

9 TRAINING

On occupation of the site, general training in emergency preparedness shall be provided to all Supagas Employees on the following subjects as a minimum:

- Definition and types of pollution incidents
- Emergency facilities, their function, location and how to use them
- Means of communication and the location of communication facilities
- Actions in case of emergency; and
- Evacuation procedures.

Specific training shall be provided to the appropriate staff on:

- First aid
- Pollution incident management
- Supagas spill containment and clean up equipment.

The training shall be provided to all new employees at the start of their employment as part of their Induction training.

Retraining shall be provided annually.

Simulated pollution incidents shall be carried out annually.

The PIRMP shall be evaluated by simulated pollution incidents. The simulated pollution incidents shall be performed annually.

Complete records of this training shall be maintained for all workplace participants.

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10 ADMINISTRATION

10.1 Action with Emergency Services

The Site Emergency Commander will invoke the provisions of the appropriate emergency plan. The site will ensure that the following occurs:

- Company Site Emergency Commander to assist the Emergency Services Commander whenever possible.
- All company personnel to assist the local Site Emergency Commander whenever possible.
- All safety, emergency and firefighting equipment to be made available to emergency services.
- Any documents to be made available to emergency services (eg. SDS)
- All entrances are cleared for emergency vehicles access.
- All access doors cleared for emergency services access.

10.2 Public Relations

Supagas personnel are **NOT** to speak to the media unless authorised by the Managing Director.

Any press releases issued to the media will be done so through the Managing Director and are to contain the following information.

- Description of the nature of the emergency;
- The corrective action taken and its effectiveness;
- When the emergency is expected to be over;
- The investigative action that will or has been taken;
- Any assistance that can be given by the media.

NOTE: ONLY THE FACTS SHOULD BE STATED

10.3 Statutory Investigation

There may be a statutory investigation into any emergency depending on the requirements in the various regulations.

A coronial inquiry may be held in the case of fire and will be held in the case of fatalities:

- Investigating authorities will be:

Police

Fire Brigade

SafeWork NSW authority

EPA

Department of Infrastructure, Planning and Natural Resources (DIPNR) Major Hazards Branch.

- The Site Emergency Commander is to ensure no movement of any evidence apart from that necessary to control the emergency.

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- The Emergency Service Commander will nominate a senior police officer to take charge of any situation which may later become subject to a coronial inquiry.

10.4 Reports

10.4.1 Incident Reports

As soon as possible after the emergency a full written report on the incident must be compiled. This will be reviewed by the Branch Manager, and the Managing Director, and passed to the appropriate authorities within 28 days of the incident.

The report must cover in detail the following items:

- Objects of the report
- Summary
- Conclusions
- Recommendations
- Remedial Action Report

10.4.2 Incident Follow-Up

A review will be conducted within 28 days of the emergency in relation to the effectiveness of the PIRMP. Areas of ineffectiveness or inefficiency will be noted and the PIRMP modified to reflect the required actions. The modifications will be tested at the ensuing drills.

10.4.3 Review and Revision of the Emergency Response Plan

In addition to review and revision arising from real emergency situations and training exercises, the PIRMP shall be subjected to a periodical review. This review shall be carried out annually to ensure that the Plan is up-to-date, effective and in line with changing community standards.

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APPENDIX A

EMERGENCY CONTACT NUMBERS

Contact Details of Relevant Authorities

If a pollution incident should occur, **all** relevant authorities need to be contacted. Contact details for each of the relevant authorities are listed below:

- EPA 13 15 55
- SafeWork NSW 13 10 50
- Fire and Rescue 1300 729 579
- Ministry of Health 9391 9000
- Shoalhaven Water 02 44213100
- Shoalhaven Council 02 44293111

SITE EMERGENCY COMMANDER

John Palmer **Mobile: 0457 848 635**

DEPUTIES

Raymond Soekianto **Mobile: 0491 158 611**

COMMUNICATIONS OFFICER

Paul Berman **Mobile: 0404 065 676**

Communicating with neighbours and local community

In the event of a pollution incident, anyone that may be affected must be notified immediately. This may include neighbouring business as well as people downstream of the stormwater outlets. The table below is a list of those that may require notification:

Business Name	Location in respect to site	Contact number
IMEEC	250 Bolong Rd, Bomaderry	02 44216266 (Travis Buchan)
South Coast Juices	220 Bolong Rd, Bomaderry	0481093083 (James)
Shoalhaven Starches	36 Bolong Rd, Bomaderry	0407 494 663 (Tony Barton)

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APPENDIX B

SDS of Potential Pollutants

- SDS Carbon Dioxide Available on the Supagas server and onsite.
- SDS Ammonia Available on the Supagas server and onsite.
- SDS Oxygen Available on the Supagas server and onsite.

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