

SUPAGAS PTY LIMITED

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

SITE: INGLEBURN



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ERP-01-ING Emergency Response Plan Ingleburn

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1 INTRODUCTION

1.1 Background

This Pollution Incident Response Management Plan (PIRMP) has been prepared for Supagas Ingleburn (NSW) depot of Supagas Pty Limited. The facility at 3 - 5 Benson Rd, Ingleburn will be used for the filling and distribution of LPG and industrial gas cylinders.

The contents of this document are to be read and understood by all Supagas personnel at the Ingleburn 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 Pollution Incident Response Management 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 Ingleburn. 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 in Table 3.1:

TABLE 3.1: NEIGHBOURING BUSINESSES

Company	Relationship to Facility	Contact Details
Inghams Chickens	North East 60m	02 9618 3299
Paslode Australia	South East 30m	02 9829 4000
Ali-Baba, Fresh Cut	South 60m	02 9829 8600
Pax Australia	South West	02 9829 2322
Serioplast	South West	02 9829 3608
Gold Tiger	North	0412 541 029
M5 Highway	West 20m	02 9825 1000

3.2 The Site

FIGURE 3.1
SITE LOCATION OF THE SUPAGAS GAS CYLINDER FILLING FACILTY
INGLEBURN

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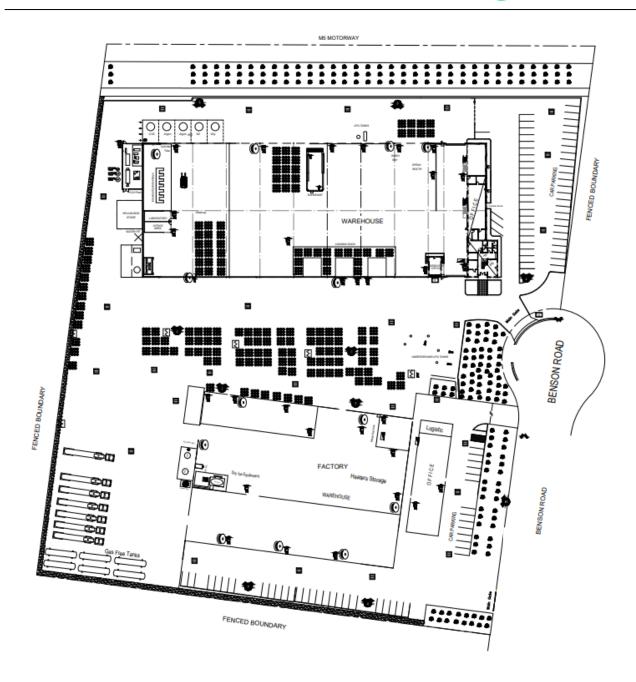




FIGURE 3.2 SUPAGAS SITE MAP

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3.3 Potential Pollutants Stored on Site

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The chemicals that are present on site which have the potential of harming the environment are in Table 2. Detailed SDS are available on the Supagas website or in HAZCHEM Boxes at the site entrances.

TABLE 3.2
POTENTIAL POLLUTANTS STORED ON SITE

Chemical	Health Hazard Information	Maximum Quantity on Site
Thinners	Avoid contact with eyes and skin. Do not inhale or ingest	1000L
Paint	Causes irritation to eyes and skin. Do not inhale or ingest	1000L
Carbon Monoxide (CO)	Asphyxiant - Effects are proportional to oxygen displacement	1000L
Diesel	Causes irritation to eyes. Causes drying and defatting of skin	40L
Ad Blue	Avoid contact with eyes and skin. Do not inhale or ingest	40L

4 TYPES OF EMERGENCY RESPONSE AND STRUCTURE

A PIRMP shall be implemented by the Site Manager, supported by the HSEQ Co-Ordinator. 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 to contain the situation alone.
- Contain it only if safe to do so.
- Alarm raise the alarm by contacting the Emergency Response Team Controller (ERTC), who shall decide on the level of the pollution incident and details of the emergency. They will activate the site Emergency Response Plan (ERP) if required.
- 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 situation shall be clarified.

4.2 Principle Roles and Responsibilities

Personnel will be allocated key emergency response duties by the ERTC. Key positions and duties are listed below. Refer to ERP-01-ING Emergency Response Plan Ingleburn, for the roles and responsibilities of key personnel in emergency response positions on site.

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Key personnel responsible for activating the PIRMP and managing the response to a pollution incident are:

Emergency Response Team Controller (ERTC)

Position: Shift Production Manager

Contact: D/S: Ben Agres 0449 803 497

A/S: Jason Bugeja 0472 590 672 N/S: Des Deanshaw 0405 184 042

Key personnel authorised to notify relevant authorities are:

Communications Controller

Position: HSEQ Co-Ordinator

Contact: Dev Vellanikaran 0490 852 743

Position: Process Safety Manager

Contact: George Lambropoulos 0417 652 034

The ERP outlines the Emergency Response Team structure and the roles of each position. The ERTC is in charge of the site and emergency and will coordinate with Emergency Services.

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:

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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4.4 Evacuation

4.4.1 Evacuation of Personnel Located Onsite

The order to evacuate the site shall be issued by the ERTC or the responsible emergency service. The procedures outlines in ERP-01-ING shall be followed. The key points are:

- All personnel are to move quickly to assembly areas
- Staff are to warn others as they go.
- Area Wardens conduct a sweep of the site to ensure the site is clear.
- Do not move or leave assembly area without permission from the ERTC or responsible emergency service unless the area is under direct threat.

4.4.2 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 **Section 3.1**.

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:

- Spill kit
- Chemical storage cabinet
- Waste Water pit (Test Shop)
- 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
- Half face mask
- Chemical suit
- Safety glasses

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6 NOTIFICATION OF INCIDENT TO AUTHORITIES

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

NSW Health (02) 9391 9000

Sydney Water 13 20 90

Campbelltown Council (02) 4645 4111

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.

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. Supagas staff are expected to maintain a thorough knowledge of pollution incident procedures related to their operations. Supagas Safe Operating and Quality Procedures must also be followed.

7.2 Emergency Procedures

This section details the responses to specific emergencies as listed below.

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7.2.1 Spills

7.2.1.1 General

Spills within the site are generally preventable and would only occur due to equipment failure or impact.

In the event of spill, the following procedure should be followed. Refer to the SDS of the chemical for the specific hazards and safe handling.

7.2.1.2 Procedures

- (a) Warn any personnel in immediate danger.
- (b) If safe, protected (i.e. PPE) and trained, contain the spill by turning off any immediate equipment, isolate any valves, and use equipment in the spill kit where necessary.
- (c) Protect storm water drains using spill kit equipment (snakes, booms etc).
- (d) Ensure spill is contained to the site and protect boundaries to prevent spill from impacting public areas.
- (e) Report the spill to the ERTC.
- (f) If not trained in spill clean-up, evacuate the area and contact the ERTC

7.2.2 Emissions

7.2.2.1 **General**

Emissions within the site are generally preventable and would only occur due to equipment failure or impact. These would generally involve the contents of cylinders.

In the event of a release, the following procedure should be followed. Refer to the SDS of the chemical for the specific hazards and safe handling.

7.2.2.2 Procedures

- (g) Warn any personnel in immediate danger.
- (h) If safe, protected (i.e. PPE) and trained, contain the release by turning off any immediate equipment and isolate any valves.
- (i) Report the release to the ERTC.
- (i) If not trained in the process, evacuate the area and contact the ERTC

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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 ERTC.

The ERTC 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

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

- Company ERTC to assist the Emergency Services Commander whenever possible.
- All company personnel to assist the local ERTC 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 ERTC is to ensure no movement of any evidence apart from that necessary to control the emergency.
- 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.

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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 Site Manager, the National Operations Manager, the National HSEQ 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
 SafeWork NSW
 Fire and Rescue
 NSW Health
 Sydney Water
 Campbelltown Council
 13 15 55
 13 10 50
 13 10 50
 13 20 90
 (02) 9391 9000
 (02) 4645 4111

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Emergency Response Team Controller (ERTC)

Position: Shift Production Manager

Contact: D/S: Ben Agres 0449 803 497

A/S: Jason Bugeja 0472 590 672 N/S: Des Deanshaw 0405 184 042

Key personnel authorised to notify relevant authorities are:

Communications Controller

Position: HSEQ Co-Ordinator

Contact: Dev Vellanikaran 0490 852 743

Position: Process Safety Manager

Contact: George Lambropoulos 0417 652 034

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:

Company	Relationship to Facility	Contact Details
Inghams Chickens	North East 60m	02 9618 3299
Paslode Australia	South East 30m	02 9829 4000
Ali-Baba, Fresh Cut	South 60m	02 9829 8600
Pax Australia	South West	02 9829 2322
Serioplast	South West	02 9829 3608

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APPENDIX B

SDS of Potential Pollutants

Chemical	SDS Location
Thinners	Available on the Supagas server and onsite
Paint	Available on the Supagas server and onsite
Carbon Monoxide (CO)	Available on the Supagas server and onsite
Diesel	Available on the Supagas server and onsite
Ad Blue	Available on the Supagas server and onsite

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