Tomago MHF Facility 10017

Pollution Incident Response Management Plan

12 Old Punt Rd, Tomago

Authorised by: Tomago Facility Emergency Controller	**Purpose**	To provide a supporting document to the Facility Emergency Response Plan that details how Pollution Incidents are identified and managed. This plan makes use of procedures and managerial responsibility described in the Facility Emergency Response Plan.
	Scope	Covers the management response for all Pollution Incident events, as defined in the NSW POEO Act, relating to Environment Protection Licence 20125.
	Responsibility	Responsibilities are defined with the plan.

Table of Contents

1. Executive Summary

This pollution incident response management plan has been established to:

- Comply with NSW legislative requirements,
- Provide clear and efficient response procedures for emergency situations that present a pollution incident,
- Provide supplementary information to the facility's emergency response plan for pollution incidents.

A revised copy of this plan will be issued whenever an amendment to the plan changes the roles of responsibilities, emergency procedures, emergency equipment on site, nature of emergencies, organisational structure, contact lists or any other factor which changes the nature or scope of the plan. Mere spelling, grammatical or formatting changes will not necessarily result in a reissue of this plan.

2. References

- AS1940 the storage and handling of flammable and combustible liquid
- Protection of the Environment Operations Act
- Tomago Environmental Protection License - 20125
- Tomago Major Hazard Facility (MHF) License – 10017-1
- MIN O FOR 011 Asbestos Register

3. Definitions

- **EPA**
  Environmental Protection Agency
- **FEC**
  Facility Emergency Controller
- **IMS**
  Incident Management System
- **POEO**
  Protection of the Environment Operations Act

4. Distribution List

Location	No. of Copies	Copies Issued
Emergency Information Box	1	1
Toll Intranet	1	1

Table 1: Distribution List

5. Potential Pollutants

- Ammonium Nitrate – 4800 tonne storage
- Diesel / Hydrocarbons – 67500 litres
- NOx gases from ammonium nitrate thermal decomposition
- Toxic plume from combustible fire

6. Pollutant Incidents

6.1 Definition

A pollution incident means an incident or set of circumstances during or as a consequence of which there is or 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.

A pollution incident is required to be notified if there is a risk of "material harm to the environment". Harm to the environment is material if:

- if involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000

Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measurements to prevent, mitigate or make good harm to the environment.

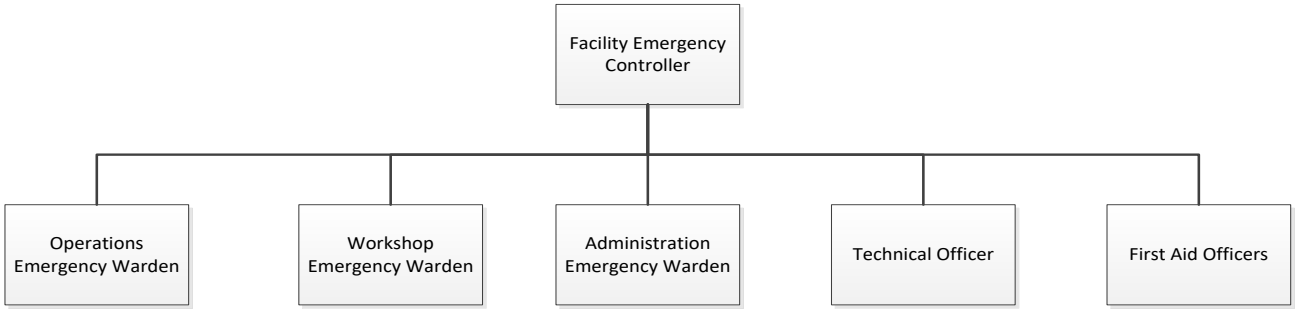
6.2 Pollutant Hazards

Hazard	Controls	Likelihood
Ammonium Nitrate Release To The Environment	• Ammonium nitrate stored in licensed stores on sealed surfaces and undercover • Ammonium nitrate stored in bulk IBC, meaning any spill will not exceed 1 tonne • Forklift operators are trained and regularly assessed • Forklift maintenance program • Facility Emergency Response Plan • Facility inspection/housekeeping program. • Provision of onsite spill kits.	Unlikely
Ammonium Nitrate Thermal Decomposition – NOx Gases	• Ammonium nitrate not stored with combustible materials • Ammonium nitrate stores have non-combustible materials of construction • Facility is a non-smoking facility • Procedure for issue of Hot Work Permits (MIN O NAT PRO-006) • 5m physical clearance around stores • Facility Emergency Response Plan • Facility inspection/housekeeping program. • Detailed risk assessments conducted as per Safety Case for Tomago MHF (license number 10017-1)	Very unlikely
Diesel Release To The Environment	• Diesel stored in double walled Transtank • Diesel transfer occurs on a sealed surface inside a bund • Diesel stored in AS1940 compliant vessel and store • Facility Emergency Response Plan • Facility inspection/housekeeping program. • Provision of onsite spill kits.	Unlikely
Toxic Plume From Fire	• Separation of combustible materials and ignition sources • Diesel stored in AS1940 compliant vessel and store • Procedure for issue of Hot Work Permits (MIN O NAT PRO-006) • Vehicle maintenance program • Facility inspection/housekeeping program.	Unlikely

Hazard	Controls	Likelihood
	• Provision of onsite firefighting equipment • Facility Emergency Response Plan.	
Asbestos Fibre Generation – Fire or Maintenance	• Asbestos register (MIN O FOR 011) (attached in hardcopy form) • Procedure for Hazardous Chemicals and Dangerous Goods (HSE-07-PRO-GLO-MIN-ALL-011)	Unlikely

Table 2: Pollution Hazard and Likelihood

7. Emergency Structure



The Facility Emergency Controller (FEC) declares when a pollution incident has occurred and subsequently manages the response and recovery from that pollution incident. The FEC will ensure that pollution incident notifications are made immediately after any ***000*** phone call.

The FEC has the responsibility to ensure that facility pollution response equipment is maintained and in good working order, furthermore the FEC has the responsibility to test this plan.

Emergency Wardens provide support and supervision of response activities on behalf and when called upon by the FEC.

8. Emergency Procedures

The response to any abnormal event within the facility is governed by the philosophy and procedures detailed in the facility emergency response plan. This plan provides details on what is a pollution incident and the notification requirements required under legislation if such an event occurs. Specific response procedures, such as chemical spill or gas release, are covered in the facility emergency response plan. A brief summary is provided here.

8.1 Chemical Spill

- The 3 Cs approach is taken; Control, Contain and Clean-up
- The identifier of a spill will first attempt to stop and contain the flow if safe to do so – This includes:
  - Deployment of onsite spill kits as necessary to protect storm water drains and release to the surrounding environment.
  - Establishment of an exclusion zone around the spill. For large diesel spill, this should include a minimum 10m exclusion zone to prevent the introduction of ignition sources.
- The identifier will then notify the FEC
- The FEC will assess the event and administer the Facility Emergency Response Plan and the Pollution Incident Response Management Plan as required.

8.2 Fire Emergency

- The identifier makes an immediate assessment of the fire and if safe to do so, as well as being appropriately trained, the identifier is to respond to a fire with a portable fire extinguisher or hose reel
- The identifier notifies the FEC

- The FEC makes an assessment of the fire and subsequently decides on whether external emergency services are required and whether a site evacuation is required
- The FEC implements the Emergency Response Plan and Pollution Incident Response Management Plan as required
- A fire impacting on ammonium nitrate storage is an external emergency requiring facility evacuation and activation of the Emergency Response Plan and this plan.

8.3 NOx and Other Toxic Gas Release

- NOx gases will not be released without a fire. Initial response is that to a fire emergency. The management of NOx exposure is to ensure that persons evacuated from the facility assemble up wind or in a protected location from the ammonium nitrate decomposition event
- Toxic gases resulting from a fire can occur and the assembly area for evacuated persons must be up wind or protected from the fire gas plume

9. Pollution Incident Notification

9.1 Agency Notification

The POEO Act stipulates a hierarchical notification process for pollution incidents. For this facility, the notifications required are listed in the table below, after first calling ***"000".***

EPA	131 555 (24hr Emergency Hotline) 02 4908 6800 (Newcastle Office)
Public Health Unit	1300 066 055 (24hr) 02 4924 6477 (Public Health Officer 24hr)
Safe Work NSW	13 10 50
Port Stephens Shire Council	02 4980 0255
Fire and Rescue (if 000 has not been called)	Mayfield West: 02 4967 7550 Raymond Terrace: 02 4987 2627

Table 3: Pollution Incident Reporting

9.2 Information to be notified

Upon reporting a pollution incident the following information is required:

- Time, date, nature, duration and location of the pollution incident
- Where the pollution is occurring or likely to occur
- The chemicals involved in the incident
- If known, the quantity or volume of pollution, including the concentration
- If known, how the incident occurred
- Action taken to deal with the pollution incident

9.3 Internal Notification & Reporting

A pollution incident is an emergency event under the Facility Emergency Response Plan.

Initial verbal reporting within Toll follows the protocols prescribed in MIN O NAT GUD 001 – Toll Mining Incident Management Process.

All pollution incidents must be investigated and reported in TRAC in accordance with HSE-13-PRO-ALD-ALL-001 - Incident Management and Reporting

10. Pollution Control (Emergency Resources)

10.1 Fire Equipment

- For details provided in the Tomago Emergency Response Plan.
- Fire Equipment includes portable fire extinguishers, fixed hose reels and a fire hydrant.

10.2 Spill Response Equipment

- 3 x 240 litre mobile spill response bins are positioned in the facility; diesel store, workshop and oil store
- Spill retention and clean up materials stored in an emergency trailer primarily for road transport emergencies.

10.3 Alarm Systems

- A site evacuation siren is positioned on the rear of the administration office and is activated by a push button at the operations office entry/ exit door.

10.4 Emergency Exits

- Signposting and lighting are maintained for all emergency exits.
- Emergency lighting is located in the main administration office, workshop office and general store.

11. Management of the Plan

11.1 Review

Review of this plan must be managed in accordance with requirements prescribed in *HSE-03-PLA-GLO-MIN-ALL-001 – Toll Mining HSEQ Management Plan.*

In line with the abovementioned document, this plan must be reviewed on a minimum 3-yearly basis or following any of the following circumstances:

- Introduction of new or changed legislation, standards or codes.
- Outcomes from incident investigations, audits or similar.
- Recommendations from risk or management system reviews;
- Agreed improvement opportunities identified by Toll Group employees, or industry;
- Changes to Toll's business objectives;
- Changes to customer, contractual and voluntary commitments; and
- Significant changes to Toll's business operations or structure.

11.2 Testing the Plan

In accordance with *HSE-03-PLA-GLO-MIN-ALL-001 – Toll Mining HSEQ Management Plan*, the FEC must ensure the facility Emergency Response Plan is tested in line with the following minimum requirements:

Review / Drill Requirement	Minimum Frequency	Responsibility	Documentation Required	Comments
Desktop review of site ERP	Within 1 month of site start-up and 6-monthly thereafter	Facility Emergency Controller (in consultation with HSE Manger / Adviser)	Documented evidence of review via meeting minutes, audit records or similar	Review should assess the currency and availability of response procedures, contact lists, equipment test records and names of key personnel, including First Aiders
Emergency response drill	Within 6 months of site start-up and annually thereafter	Facility Emergency Controller (in consultation with HSE Manger / Adviser)	*MIN O NAT FOR 008 Record of Emergency Event or Exercise*	The scope of the emergency drill must be determined by the Operations Manager, however, over time they should be sufficiently varied to test a range of emergency responses, including pollution incidents. As a minimum, drills must include a full site evacuation on a minimum annual basis.

12. Training

Role	Training Need	Frequency
Facility Emergency Controller (FEC)	• PIRMP duties and responsibilities	Annually
All site personnel	• PIRMP duties and responsibilities • Use of pollution response equipment	Annually

13. Contact List

13.1 Facility Personnel

Position	Name	Contact
Senior Operations Manager	Paul Nicou	0421 585 536
Compliance Administrator	Sharon Walters	(02) 4013 2220
HSE Manager	Jeane Forget	0417 922 551
Tomago Depot Manager (Facility Emergency Controller)	Emma Boyce-Bacon	04456 957 126

13.2 Neighbours

A contact listing for neighbours affected by a pollution incident is maintained in the Facility Emergency Response Plan. Contact will not be made to neighbours until a direction has been provided by the EPA or the neighbour(s) are at immediate risk of harm.

Toll will not undertake direct contact with neighbours or the community within engaging with emergency services in attendance. Contact with the community, during the pollution incident, will occur either through a media release or phone call.

Where appropriate after a pollution event has ceased, Toll will provide communication with the affected community by way of the most appropriate method. Such a method may include written correspondence, media release, community meeting or phone contact.

Revisions

Revision No	Date	Description	Revised by:	Approved by:
00	01/06/2016	New Plan developed	S. Holman	S. Holman
1.0	17/07/2020	Revision of plan.	A. Newbold	P. Nicou
1.1	03/11/2020	Assigned new document number and header	Sharon Walters	
1.2	28/03/2023	Revision and update of contact details	T. Anderson	P. Nicou
1.3	25/04/24	Revision and update contact details	S. Nightingale	E. Boyce-Bacon

14. Map 1. – Facility Chemical Storage Locations

15. Map 2. – Facility Location and Surrounding Land Use