

LINX



Pollution Incident Response Management Plan (PIRMP)

1 Cowper St North, Carrington

This document outlines the considerations, risk assessments, and management and control measures associated with the environmental management of the LINX Eastern Basin Distribution Centre and its associated infrastructure.



1. Background

Eastern Basin Distribution Centre is a LINX run port facility operating out of premises leased from the Port of Newcastle. The facility is located inside the Port of Newcastle Carrington precinct with a wharf apron comprised of two berths known as East Basin 1 Berth (EB1) and East Basin 2 Berth (EB2). Adjacent to the berths is the storage area comprising of undercover and hard stand storage.

There is an administration complex and container storage yard within the leased area adjacent to an operational rail siding.

The facility operates as an import/export facility for a variety of cargoes including export Aluminium and steel and import of break bulk steel and timber products. From time to time project cargo and boats are also handled through the facility.

The site at 1 Cowper Street, Carrington operates under EPL number 20484.

2. Definition of 'Pollution Incident'

The definition of pollution incident is:

Pollution incident means 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.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

- (a) harm to the environment is material if:
 - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

3. Description and Likelihood of Hazards

The following is a summary of the potential hazards to human health or the environment associated with the activity being undertaken at the premises and the likelihood of any such hazards occurring (including details of any circumstances or events that could, or would, increase that likelihood).

Potential Environmental Hazards

Is the Environmental issue applicable to the site?	Environmental Issues	Likely Impacts
✓\}	Air Quality	<p>Photochemical smog is an important air quality issue in the metropolitan regions. Ground level ozone (largely resulting from motor vehicle emissions) is the major constituent of photochemical smog which can have adverse effects on human health, vegetation and building materials.</p> <p>Diesel fumes contribute to brown haze and reduced visibility.</p> <p>Impacts of dust (coarse particles) are generally local and more in terms of nuisance such as damage to or soiling of materials, or adverse effects on sensitive vegetation through surface coating. However, contaminated dust (e.g. lead) can cause adverse health effects.</p>
✓\}	Surface Water Quality	<p>Stormwater run-off carries loose soil particles from disturbed soil surface (soil erosion) into the receiving surface waters and causes turbidity which can reduce light penetration and limit plant growth, fish movement and the ability of predatory fish and birds to see their prey. It can also restrict fishing and recreational activities.</p> <p>Sediment run-off is also considered to be the most significant contributor to increasing nutrient levels in wet weather conditions.</p> <p>Elevated levels of nutrients (phosphorous and nitrogen) in water often promote excessive growth of algae. Algal blooms reduce light and may release toxic compounds into the water killing aquatic organisms as well as restricting fish migration, fishing and recreational activities.</p>
✓\}	Noise	<p>Noise can affect human health in a number of ways such as annoyance reaction, sleep disturbance, interference with communication and hearing loss.</p>
✓\}	Waste	<p>Construction and demolition waste contributes 1.5 million tonnes of waste to landfill each year. Land is a scarce natural resource and landfills are expensive to establish and maintain. Furthermore, there are a lot of political issues attached in siting landfills, especially in large cities, as no one wants a landfill in their backyard. Hence, landfill space should be used sparingly. Landfills can adversely impact on the quality of soil and groundwater as well as greenhouse effect through emission of methane gas.</p>

Is the Environmental issue applicable to the site?	Environmental Issues	Likely Impacts
✓	Energy Use	<p>Australians are dependent on fossil fuels for their major source of energy. The world's fossil fuel reserves are limited and are considered to be non-renewable and scarce.</p> <p>The combustion of fossil fuels generates carbon dioxide, which is a greenhouse gas. The emission of greenhouse gases from power stations increases the greenhouse gas concentration in the atmosphere which in turn adds to the greenhouse effect and can potentially cause climate change/global warming.</p>

4. Preparation of PIRMP

The following pre-emptive actions have been considered and responsibility for their implementation identified:

4.1 Air Quality

ISSUE/ACTION	IMPLEMENTATION	
Environmental issues	Work Instructions/Control Measures	Responsibility
<ul style="list-style-type: none"> Dust emission from exposed soil areas and stockpiles 	<ul style="list-style-type: none"> Dust emissions are to be monitored at regular intervals through visual assessment. Dust suppression is to be used should dust emissions rise to a level where product contamination or off site transfer of particles may occur to an unacceptable level. Site Traffic Management Plan to be complied with at all times. 	All site employees to observe. Operations Manager (or his delegate) to instigate.
<ul style="list-style-type: none"> Vehicle Fumes 	<ul style="list-style-type: none"> Regularly maintain machinery for maximum efficiency. Minimise unnecessary movement of machinery on-site 	Individual machine operator/ Maintenance Division
<ul style="list-style-type: none"> Other emissions 	<ul style="list-style-type: none"> N/A 	

4.2 Flora & Fauna

ISSUE/ACTION	IMPLEMENTATION	
Environmental issues	Work Instructions/Control Measures	Responsibility
Tree preservation/ Weed Management	<ul style="list-style-type: none"> The Business Unit Manager or the Industrial Services Manager must approve the removal of any trees from the site. All noxious and other weeds to be removed through the use of a suitable pesticide. 	Operations Manager (or his delegate) to instigate.

4.3 Waste

ISSUE/ACTION	IMPLEMENTATION	
Environmental issues	Work Instructions/ Control Measures	Responsibility
<ul style="list-style-type: none"> General 	<ul style="list-style-type: none"> Site mobile plant clean out facilities to be established and maintained as required. All waste to be sorted and recycled where possible Keep the sorting area tidy. Record though purchase order the types and amounts of waste removed from site. i.e. recycled waste, waste sent to landfill, etc. 	Operations Manager (or his delegate)

4.4 Energy Use

ISSUE/ACTION	IMPLEMENTATION	
Environmental issues	Work Instructions/Control Measures	Responsibility
Diesel used for heavy machinery and equipment used on site	<ul style="list-style-type: none"> Monitor fuel usage and types of machinery used. Minimise the unnecessary movement of heavy machinery on-site. Minimise machinery idling time. 	Operations Manager (or his delegate)

4.5 Noise

ISSUE/ACTION	IMPLEMENTATION	
Environmental issues	Work Instructions/ Control Measures	Responsibility
Noise emission from site activities	<ul style="list-style-type: none"> All practicable steps should be taken to reduce noise emissions from the site. During shipping transfers however the site is expected to operate 24 hours a day. 	Operations Manager (or his delegate)

5. Inventory of Pollutants

An inventory of all bulk products stored on site is to be maintained. Total quantities of stored materials must be available should they be called for in the unlikely event of an environmental incident.

The attached site diagram identified storage areas across the site.

6. Safety/Environmental Equipment

In an attempt to minimise the risk to humans and the environment from a safety and/or environmental incident, the following control measures are in place:

6.1 Implementation of the provisions of the LINX Traffic Management Critical Risk Controls (CRC).

Through compliance with this CRC, the possibilities of interactions between personal and equipment will be minimised. The implementation will also reduce the possibility of vehicle collisions with other vehicles and/or equipment through the establishment and maintenance of dedicated vehicle traffic flow practices.

6.2 Implementation of the provisions of the LINX Road Transport CRC.

Through compliance with the CRC, LINX will ensure that all heavy vehicle operators are competent to perform their duties and have been appropriately training and assessed in the operation of their equipment.

6.3 The on-site Emergency Response Equipment.

The LINX Operations Manager will be responsible for the maintenance and serviceability of the spill kits. The Operations Manager is responsible to ensure that the spill kits are appropriately stocked at all times and available in the event of an environmental incident. The Operations Manager is also to ensure that suitably trained and qualified staff are available to utilise the spill kits at all times.

6.4 Communicating with neighbours and the local community

Communicating with neighbours and the local community is an important element in managing the response to any incident. Emergency and other contact details are provided at the Emergency Contact Details section of this document. A Patrick complaints line has been established and advertised. The administration number is 49 620 600.

6.5 Minimising harm to persons on the premises

Emergency response and management plans are provided at all visitors and staff through the LINX induction process. All visitors on site shall be escorted at all times and should follow the directions of their host or other EBDC Staff in the event of an emergency.

6.6 Actions to be taken during or immediately after a pollution incident

In the event of an incident, the Operations Manager is to assume responsibility for the site and is to coordinate all actions/activities under the guidance of emergency personal and relevant authorities' procedures/requests. This includes actions to combat pollution incident response.

All staff are to be aware of and understand the provisions of the emergency procedures, the location of the Emergency Response Plan, and the Assembly Areas.

Copies of the Site Emergency Response plan (including the contact list and site map) are to be held on site and controlled by the Operations Manager.

A site map is included in the site induction and clearly shows the locations of:

- hazardous/flammable chemicals stored on-site;
- Safety Data Sheets (**SDS**);
- emergency response equipment such as fire extinguishers;
- first aid kits, spill kits, etc; and
- assembly areas.

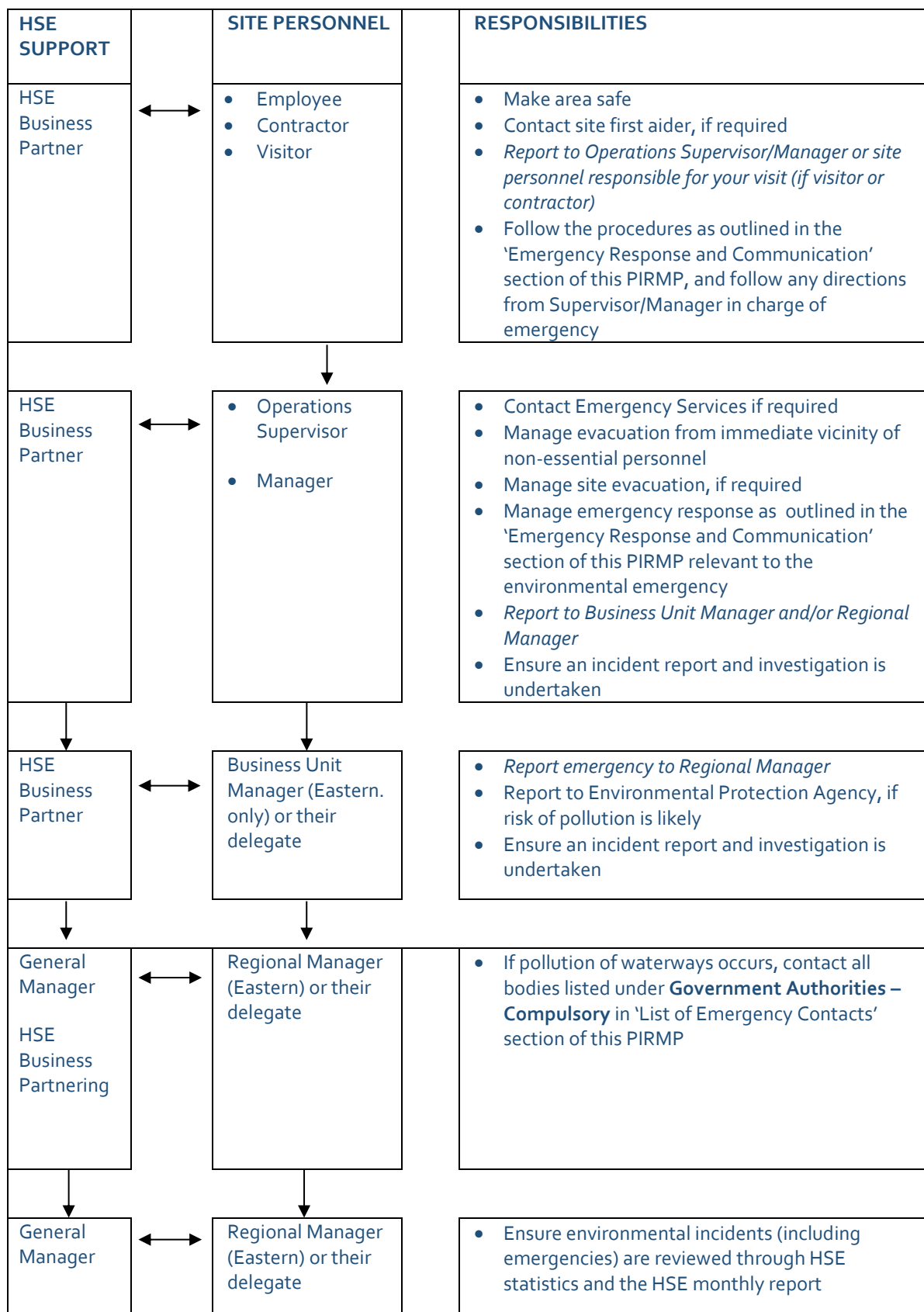
The Site map is also displayed in a number of buildings throughout the site. Copies of the plan can be obtained through the Operations manager.

All emergency incidents shall be recorded and an investigation coordinated by the relevant Operational Manager and the HSE Business Partner to determine the cause(s) of the incidents. An investigation report shall be developed explaining the causes and the corrective and preventative measures taken.

The Site Emergency Response equipment will be tested/inspected on a regular basis. It is the responsibility of the relevant Operations Manager to ensure that these tests/inspections are conducted and recorded.

This PIRMP shall be tested annually in accordance with legislative requirements.

7. Reporting Flow Chart



HSE Business Partnering		
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8. Emergency Response & Communication

The following emergency response & communication provisions are to be considered in response to an incident

POTENTIAL EMERGENCIES	WHAT TO DO?	RELEVANT AUTHORITIES & PERSONS
<p>Injury caused by:</p> <ul style="list-style-type: none"> • Fire • Explosion • Machinery accidents • Major injuries 	<ul style="list-style-type: none"> • For serious injuries, the Operations Manager (or a member of management) will ensure that the ambulance service has been called. • Immediately inform a First Aider who can provide assistance. • Follow the guidance provided through the Site map. • For serious injuries and/or potential serious incidents, contact the HSE Advisor. • Ensure compliance with emergency personnel and relevant authorities procedures/requests. This includes actions to combat pollution incident response which is to be coordinated by the Operations Manager. The General Manager HSE and the General Manager Operations are to ensure that reportable environmental incidents are reported to the EPA within the relevant timeframe. 	<ul style="list-style-type: none"> • Operations Manager • HSE Business Partner • Refer to Reporting Flowchart

POTENTIAL EMERGENCIES	WHAT TO DO?	RELEVANT AUTHORITES & PERSONS
<p>Fire</p> <ul style="list-style-type: none"> • Fire involving machinery • Fire caused by vandalism 	<ul style="list-style-type: none"> • Evacuate all personnel to the site muster point immediately. • Operations manager to ensure that the Fire Brigade (Emergency Services) has been called. • Follow the procedures as detailed in the Emergency Procedures. • Ensure compliance with emergency personnel and relevant authorities procedures/requests. This includes actions to combat environmental incident response which is to be coordinated by the Operations Manager. General Manager HSE is also to ensure that environmental incidents are reported to the EPA within the relevant timeframe. • If it is safe and you have the necessary qualifications and experience, try to put the fire out using the fire extinguishers provided on the site (the locations of the fire extinguishers are shown on the site map attached to the Emergency Response Plan). • Verbally report the incident to senior management and complete an incident report • General Manager HSE and the General Manager Operations are to ensure that reportable environmental incidents are reported to the EPA within the relevant timeframe. 	<ul style="list-style-type: none"> • Operations Manager • HSE Business Partner • Refer to Reporting Flowchart
<ul style="list-style-type: none"> • Explosion (e.g. rupture of gas tank) 	<ul style="list-style-type: none"> • Evacuate all personnel to a safe area immediately. • Call the Emergency Services immediately. • Contact the neighbouring residents. • If service related, call the relevant service provider (e.g. AGL) • If site related, contact Elgas – Elgas has an emergency response team. • Contact the Operations Manager • The General Manager HSE and the General Manager Operations are to ensure that reportable environmental incidents are reported to the EPA within the relevant timeframe. 	<ul style="list-style-type: none"> • Operations Manager • HSE Business Partner • Refer to Reporting Flowchart

<p>Spills</p> <ul style="list-style-type: none"> • Spill or release of other hazardous chemicals or material. • Spill during on site refuelling of plant. 	<ul style="list-style-type: none"> • For serious spills, immediately call the Fire Brigade. • Identify the source of the spill. • Contact the Operations Manager • If the material is dangerous, evacuate the site immediately and notify the neighbours. • If it is safe, stop the source of the spill immediately. • Contain the spill and control its flow. Ensure the correct spill equipment is used (e.g. hydrocarbons). • Block stormwater drains downstream of the spill. • Refer to the Safety Data Sheet (SDS) for further spill management requirements and/or first aid requirements (if needed). • Clean up small spills promptly to prevent run-off into the stormwater system. • The General Manager HSE and the General Manager Operations are to ensure that reportable environmental incidents are reported to the EPA within the relevant timeframe. EPA and local council must be notified about the spills that are likely to threaten the environment. 	<ul style="list-style-type: none"> • Operations Manager • HSE Business Partner • Refer to Reporting Flowchart
<p>Discovery of items of conservation value (e.g. Flora & fauna, heritage)</p>	<ul style="list-style-type: none"> • Fence off the area as a "no go" zone and contact the Operations Manager immediately for further action. 	<ul style="list-style-type: none"> • Operations Manager • HSE Business Partner • Refer to Reporting Flowchart
<p>Discovery of contaminated material on-site.</p>	<ul style="list-style-type: none"> • Fence off the area as a "no go" zone and contact the Operations Manager immediately for further action. 	<ul style="list-style-type: none"> • Operations Manager • HSE Business Partner • Refer to Reporting Flowchart
<p>In the event of an incident that has the potential to impact on neighbours or others in the vicinity</p>	<ul style="list-style-type: none"> • Effected or potentially effected neighbours to be contacted by phone immediately after an incident has been identified which has the potential to impact on site neighbours. • Once initial contact is made effected neighbours to be contacted once the incident has been addressed. • Verbally report the incident to senior management and complete an incident report • In the event of a prolonged incident, affected and potentially effected neighbours are to be contacted regularly and updated on the status of the incident. Additional contact may be necessary. Such decisions will be 	<ul style="list-style-type: none"> • Operations Manager • HSE Business Partner • Refer to Reporting Flowchart

	made by the Operations Manager in consultation with the Regional Manager.	
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9. Staff Training

All site staff, contractors and visitors are provided with general environmental training in accordance with the provisions of this PIRMP. This training is delivered through a number of mediums including:

- site induction and safety training;
- familiarisation with this PIRMP and its content;
- established company emergency response procedures;
- equipment maintenance and operation practices and procedures, and
- instruction in site operating practices.

This requirement for training is reviewed on an annual basis in accordance with established procedures. This review is to be undertaken by the HSE Business Partner and Operations Manager.

10. Environmental Management Auditing, Monitoring, and Reporting practices

Auditing of the provisions of this PIRMP is to be conducted in accordance with legislative requirements. All environmental incidents are to be reported and investigated in accordance with the provisions of the company's Incident Reporting procedures. The relevant business unit manager is to ensure that the Newcastle Business Manager is advised of any incident that impacts or is likely to impact on the environment.

In addition to the above, environmental issues are to be included as a standard agenda item at all company Toolbox Meetings. Relevant managers are to ensure that environmental concerns are discussed in detail at these meetings and where necessary documented for further consideration.

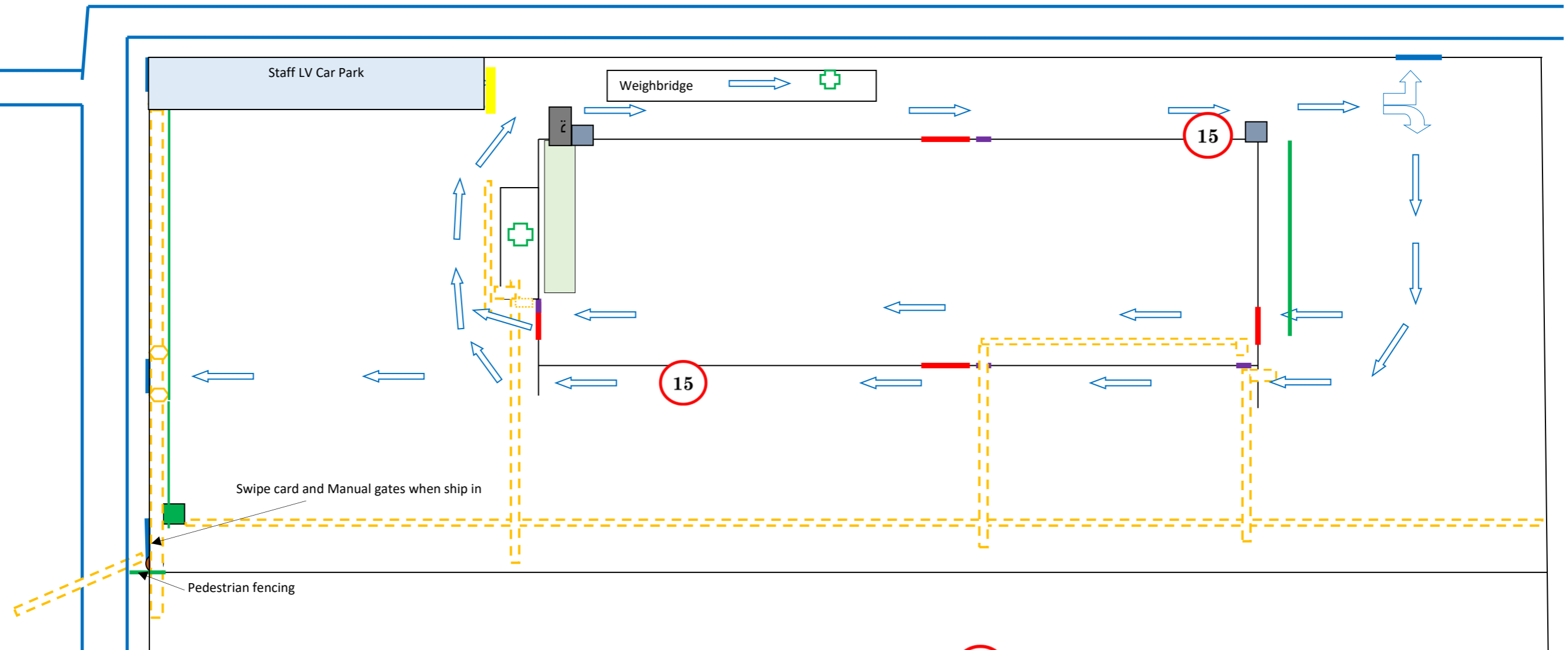
Approval







Title	Name	Date
Eastern Basin Site Manager	Darren Pozinack	13/08/2021







11. Emergency Contacts

Internal Management	
General Manager Operations	0419 366 280
Operations Manager – Darren Pozinack	0418 656 326
Operations Manager (Stevedores) – Mathew Grech	0437 049 731
HSE Business Partner– Erin Pettit	0412 169 220
Government Authority – Compulsory	
NSW EPA	131 555
Emergency Services including Fire Brigade, Ambulance and Police	000
Local Council – Newcastle City Council	02 4974 2000
Fire and Rescue NSW (FRNSW)	1300 729 579
NSW Ministry of Health	02 9391 9000
SafeWork NSW	13 10 50
Emergency Contacts	
Nearest Medical Centre Sonic HealthPlus, 57 Belford St Newcastle	02 4978 6666
Nearest Hospital: Calvary Mater Hospital Corner of Edith & Platt Streets Waratah	02 4921 1211
Poison's Information Centre	131 126
Hunter Water	1300 657 000
AGL Electricity	Emergency Line: 132 080
AGL Gas	Emergency Line: 131 909
Waste Disposal and spill clean-up services (Economy Sweepers)	0403 255 856
Neighbouring Sites:	
GrainCorp	02 4961 8100
ConPorts	02 4962 1666
Svitzer	02 4920 2200
National Agri Terminal	02 4962 4006
Commercial Metals Company	02 4927 6966
Newcastle Stevedores	
Port of Newcastle Gatehouse	02 4961 6856 0437 691 082

SITE MAP/PLAN



- Site UHF **CH 40**
- Truck route (*preferred*) 
- Gate house 
- Emergency Muster Point 
- Boom Gate 
- Pedestrian Gates 
- Traffic flow may change based on operational requirements
- Truck parking area indicated by signage
- Spill Kits 

- Site Speed Limit 
- Pedestrian walkways 
- Pedestrian fencing 
- First Aid Boxes 
- Swipe card Gate 
- Maintenance area 
- Diesel Tank 