

	Management System Procedure	EN-821
		Pollution Incident Response Management Plan

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PURPOSE

The purpose of the Pollution Incident Response Management Plan (PIRMP) is to illustrate how Nepean Building & Infrastructure will respond to a potential environmental incident and be compliant under the Protection of Environment Operations Act 1997.

SCOPE

This plan covers the Galserv, Weldlok and Galintel operational businesses located at 117 – 153 Rookwood Road, Yagoona, NSW 2199, but predominantly covers the Galserv business to meet the EPA licence requirements.

SITE DETAILS

Item	Details
Site Name	Nepean Building & Infrastructure
Site address	117 – 153 Rookwood Road, Yagoona NSW 2199
Local Government Authority	Bankstown Council
Site phone number	(02) 9707 5000

INTRODUCTION

The site is located in the industrial area of Yagoona and there are eight buildings presently on the site including Weldlok, Galserv, Weldlok Despatch and three office buildings.

The Galserv business operates 3 x shifts over a 5 day week and the scheduled activities include Metallurgical hot dip galvanising. Pre-treatment includes treatment of metal products with an alkaline degreasing solution and an acid pickling solution prior to hot dip galvanising.

Pedestrian and vehicle access to the site is via gates one to three off Rookwood Road.

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HAZARD & RISK IDENTIFICATION

Workers and others may be exposed to a range of hazards or risks in the course of their daily work activities, the risks from these work activities are identified and assessed and if assessed as unsafe must be eliminated or minimised so far reasonably practicable. A risk assessment is used in the identification and assessment of the hazards or risks to safety, health and environment in the workplace; and development of options implementing the best methods of controlling and eliminating these risks, the process is outlined as below.

	Consequence				
People	Report Only - Injuries or ailments not requiring medical treatment.	Minor injury or First Aid Treatment Case.	Serious injury requiring hospitalisation or medical treatment.	Multiple serious injuries.	Death or multiple life threatening injuries.
Reputation	Internal Review	Scrutiny required by internal committees or internal audit to prevent escalation.	Scrutiny required by external committees or ACT Auditor General's Office, or inquest, etc.	Intense public, political and media scrutiny. E.g.: front page headlines, TV, etc.	Assembly inquiry or Commission of inquiry or adverse national media.
Environment	No lasting effect. Low level impacts on biological or physical environment. Limited damage to minimal area of low significance	Minor effects on biological or physical environment. Minor short-medium term damage to small area of limited significance	Moderate effects on biological or physical environment but not affecting the ecosystem function. Moderate short to medium term impacts.	Serious environmental effects with some impairment to the ecosystem With medium to long term impacts	Long term, widespread effects on the environment
Business Process & Systems	Minor errors in systems or processes requiring corrective action, or minor delay without impact on overall schedule.	Policy procedural rule occasionally not met or services do not fully meet needs.	One or more key accountability requirements not met. Inconvenient but not client welfare threatening.	Strategies not consistent with Nepean's agenda. Trends show service is degraded.	Critical system failure, bad policy advice or ongoing non-compliance. Business severely affected.
Legal	Low-level legal issue	Minor legal issues. Non-compliances and breaches of regulation.	Serious breach of regulation with prosecution and/or moderate fine possible	Major breach of regulation. Major litigation.	Significant prosecution and fines. Very serious litigation / class action
Financial	<\$2K	\$2,001 to \$25K	\$26K to \$100K	\$101K to 500K	\$500K
Manufacturing and Design	No Effect to the Operation of the Business (Typically Ex Stock Standard Products)	Impact Minimal with some bespoke fabrication (i.e. Standard Handrail Pre-Fab and Grating Fab)	Increase costs likely to comply with requirements (Can be catered for with vigilance)	Moderate Strain to the operations (Outside current capabilities or capacity)	Significant strain to the operations due to system failure
	Negligible	Minor	Moderate	Major	Extreme

Likelihood ↑	Is expected to occur in most circumstances	5	Certain	M	H	H	E	E
	Will probably occur	4	Likely	M	M	H	H	E
	Might occur at some time in the future	3	Possible	L	M	M	H	E
	Could occur but doubtful	2	Unlikely	L	M	M	H	H
	May occur but only in exceptional circumstances	1	Rare	L	L	M	M	H

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RISK CONTROL

Risk control is a method of managing the risk with the primary emphasis on controlling the hazards at source. For a risk that is assessed as “high”, steps should be taken immediately to minimize risk of injury. The method of ensuring that risks are controlled effectively is by using the “hierarchy of controls”. The Hierarchy of Controls are:

Order No.	Control	Example
Firstly	Eliminate	Removing the hazard, eg taking a hazardous piece of equipment out of service.
Secondly	Substitute	Replacing a hazardous substance or process with a less hazardous one, eg substituting a hazardous substance with a non-hazardous substance.
Thirdly	Isolation	Isolating the hazard from the person at risk, eg using a guard or barrier.
Fourthly	Engineering	Redesign a process or piece of equipment to make it less hazardous.
Fifthly	Administrative	Adopting safe work practices or providing appropriate training, instruction or information.
Sixthly	Personal Protective Equipment	The use of personal protective equipment could include using gloves, glasses, earmuffs, aprons, safety footwear, and dust masks. NOTE: This is a last resort control and should be for interim periods only, while higher level control is developed or implemented.

PULLANTANT INVENTORY MANIFEST

Pollutant	Storage Location	SDS available	Emission controls	Quantity
Sodium Hydroxide	Inground tank	Yes	<ul style="list-style-type: none"> 'Storm water valve close off to prevent discharge on contain on site 'Over flow bund area with alarm and lighting, linked to alarm system if no-one on site 'Polymer coating inside pre-treatment tank and under ground bunding of pre-treatment tanks Ground Water remediation strategy 'Storm water testing by external company with regular monitoring and review of data 	60,000L

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Hydrochloric Acid	Inground Tank	Yes	<ul style="list-style-type: none"> • 'Storm water valve close off to prevent discharge on contain on site • 'Over flow bund area with alarm and lighting, linked to alarm system if no-one on site • 'Polymer coating inside pre-treatment tank and under ground bunding of pre-treatment tanks • Ground Water remediation strategy • 'Storm water testing by external company with regular monitoring and review of data 	235,000L
Sulphuric Acid	Inground Tank	Yes	<ul style="list-style-type: none"> • 'Storm water valve close off to prevent discharge on contain on site • 'Over flow bund area with alarm and lighting, linked to alarm system if no-one on site • 'Polymer coating inside pre-treatment tank and under ground bunding of pre-treatment tanks • Ground Water remediation strategy • 'Storm water testing by external company with regular monitoring and review of data 	44,000L
Sodium Dichromate	Inground Tank	Yes	<ul style="list-style-type: none"> • 'Storm water valve close off to prevent discharge on contain on site 	48,000L

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			<ul style="list-style-type: none"> 'Over flow bund area with alarm and lighting, linked to alarm system if no-one on site 'Polymer coating inside pre-treatment tank and under ground bunding of pre-treatment tanks Ground Water remediation strategy 'Storm water testing by external company with regular monitoring and review of data 	
Zinc	Inground tank	Yes	<ul style="list-style-type: none"> 'Over flow bund area with alarm and lighting, linked to alarm system if no-one on site Alarm linked to kettle to maintain temperature Baghouse for air emissions 	

CHEMICAL STORAGE AND HANDLING

A number of chemicals are required for the galvanising process some of these are stored and handled on site however some of the chemicals required are delivered to site by tanker and transferred directly to the appropriate chemical tank on site.

A dangerous goods manifest and Hazardous Chemical Register is available which includes storage locations including with map, minimum and maximum levels on site at one time and class type. Safety Data Sheets are available for all chemicals and are located with each business unit.

DIPOSAL

To ensure environmentally responsible disposal of contaminated material as per the Safety Data Sheet, company Policy and relevant legislation, Disposal must be arranged licenced external contractor.

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An Incident Form must be completed in accordance with Nepean's internal incident reporting procedures.

SAFETY EQUIPMENT

Safety Equipment	Description	Location
Chemical SDS	Information regarding chemical	Each Business Unit
Spill kits	Equipment to absorb spills at designated locations.	Emergency Shower Shed
PPE	Personal protection equipment which is required in accordance with SDS specifications	Storage/Office Areas
Emergency Safety Drain valve shut off	To close of drains onsite in the event of a chemical spill	Emergency Shower Shed

ENVIRONMENTAL EMERGENCY

Following are examples of environmental emergencies:

- Fire – Infrastructure, vehicles, hydraulic systems
- Acid/alkali spills – potential discharge to storm water drains
- Molten metal explosion/spill
- Hazardous airborne emissions
- Flammable gas fire/explosion

Internal Notification

Safety		<ul style="list-style-type: none"> • Care for workers - Evacuate Area, • Care for the Environment – e.g. Contain spills, put out fires; ONLY if safe to do so
Treatment		Provide First Aid or Medical Treatment, if required
Dr: Corporate Medical Consultants	Phone: 02 8323 6222	Dr Address: Suite 2, Level 1, 402-410 Chapel Rd, BANKSTOWN NSW 2200

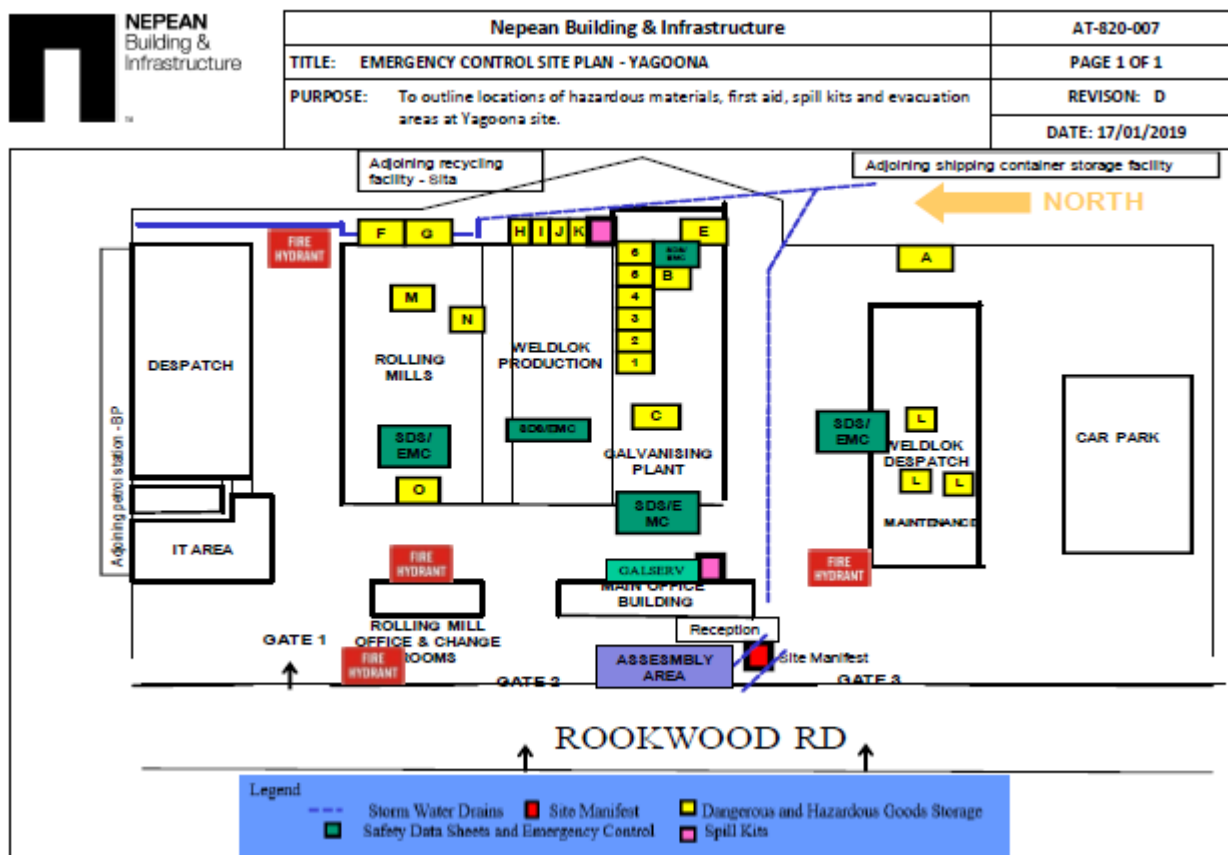
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Ambulance:		000 (triple zero)	
Hospital: BANKSTOWN	Phone: 9881 8000	Hospital Address: Bankstown-Lidcombe Hospital Eldridge Road BANKSTOWN NSW 2200	
Minor Spills <ul style="list-style-type: none"> Identify the substance causing the emission if it can be safely identified and refer to the SDS for information regarding first aid instructions, advice on appropriate Personal Protection Equipment that may be required. Contain the spill (Spill Kits) and control its flow from the site. If it is not safe or the substance cannot be identified, contact the Fire Brigade on "000". Clear the area of all personnel and shut down all plant if required. Report the spill to the General Manager- Galserv or Senior Management representative, if pollution has escaped the site or if the spill has potential to harm the environment Report any pollution incident no matter how small, to your direct supervisor 			
Major Spills <ul style="list-style-type: none"> For large-scale hazardous spills call NSW Fire and Rescue immediately on 000 zero. Identify the substance causing the emission, if it can be safely identified refer to the SDS for information regarding first aid instructions, advice on appropriate Personal Protection Equipment (PPE) that may be required and contain the spill (Spill Kits) and control its flow from the site if safe to do so Report the spill to the General Manager- Galserv or Senior Management representative if pollution has escaped the site or if the spill has potential to harm the environment Call Transpacific Industries (TPI) with details of spill so their emergency response crews can assist. 1800 774 557 (24hr Emergency Response Hotline) Call Key People listed below in order 			
Notify Key People		Key people to be notified – work down the list until contact is made verbally	
General Manager - Galserv		Phone:	
Production Manager - Galserv		Phone:	
Managing Director		Phone:	
Operations Manager - Galserv		Phone:	
General Manager - Weldlok		Phone:	
During and After Incident		Follow all instructions given by the emergency services. All emergency and evacuation procedures including the notification and evacuating of neighbours are the responsibility of the emergency services. Emergency services are to advise when it is safe to return to work.	

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Media Relations

In the event of any pollution related incident, **ONLY** the Managing director or his delegate are authorised to make any statements to the media or public.



MANAGEMENT ACTION

Contact management immediately (refer emergency phone numbers on flip chart)

- The General Manager- Galserv is responsible for notifying the authorities in order as listed below.
- If the General Manager - Galserv is not available or immediately contactable, the Production Manager shall be the person to take the responsibility for notifying the authorities immediately.
- In the event that the General Manager - Galserv or Production Manager are both not available and contactable, the Managing Director shall be the person to take the responsibility for notifying the authorities immediately.

Fallback, the responsibility to call the relevant authorities will reside with the Operations Manger - Galserv or the Production Manager for Weldlok or Galintel in the event the General Manager - Galserv, Production Manager and Managing Director have not been contactable.

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In the event of a major incident on site, **ONLY** the Managing Director or his delegate, shall be authorised to make any statements to the media or public.

In the event of an environmental emergency, it is the responsibility of most senior management position holder to notify neighbouring businesses and to contact the following authorities immediately:

SITE MANAGEMENT TEAM		AUTHORITIES TO NOTIFY OF POLLUTION INCIDENTS
General Manager - Galserv	Phone:	Environment Protection Authority (EPA) Tel: 131 555
Managing Director	Phone:	Ministry of Health Tel: (02) 9391 9000
Production Manager - Galserv	Phone:	WorkCover NSW Tel: 131 050
General Manager - Weldlok	Phone:	Bankstown Council Tel: (02) 9840 9840
Operations Manager - Weldlok	Phone:	Fire and Rescue Tel: 000

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NEIGHBOURING BUSINESSES



Community Contact List			
	Company	Address	Contact No.
1	BP Petrol Station Potts Hill	155 – 157 Rookwood Road Yagoona NSW 2199	Ph 9790 5377

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2	Container Depot	Rookwood Road Yagoona NSW 2199	Ph 9793 7874
3	Construction Site	15 Muir Road Chullora NSW 2199	TBA
4	Toll SPD	10 Brunner Rd, Chullora, NSW 2190	(02) 8713 7200

TRAINING

Training and Awareness sessions will be held with key stakeholders upon revision of the PIRMP. All new employees receive a structured information package which includes safety, environmental and Quality policies and procedures in their induction program. All training records are held with each business unit.

Contractors will be made aware of the PIRMP requirements via Conditions of Entry for working on site. Records are held with Maintenance

Recorded toolbox training sessions are conducted on a daily basis or as needed to cover any safety, environmental or quality incidents which may have occurred over the last 24 hours.

TESTING & REVIEW

Nepean Building & Infrastructure will test the plan a minimum of every 12 months by assessing and reviewing and making any necessary changes following the assessment. The PIRMP plan will be reviewed within 1 month of an incident occurring and/or test. The PIRMP has been tested on the following dates;

PIRMP Update Dates	Testing Dates	Tested by
01/05/2015	16/05/2016	Quality Coordinator
22/08/2017	22/02/2017	HSEQ Coordinator - Galserv
29/10/2018	24/08/2018	NB&I HSEQ Coordinator
21/01/2018	03/12/2018	NB&I HSEQ Coordinator

CONTROL OF DOCUMENTATION AND RECORDS

All documents and records are kept and maintained within the Nepean Business System which comprises of 14001:2015 Environmental, 9001:2015 Quality and 45001:2018 Safety Standards. A copy of the PIRMP is also displayed on the Galserv Webpage. All records are kept electronically indefinitely within the companies document control software and backed up to the cloud.

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The following documents/references have been used to assist in the preparation of this PIRMP

- Emergency Control Procedure
- Dangerous Goods Manifest
- Dangerous Goods and Hazardous Chemical Register
- Emergency Procedure Flipchart
- Emergency Site Diagram
- Storm Water Management Plan
- Protection of the Environment Operations (General) Regulation 2009