

PORT KEMBLA

Pollution Incident Response Management Plan

MCW-PTK-REC-EMG-0002
(Web version)



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LIST OF ACRONYMS

ACRONYM	DEFINITION
PIRMP	Pollution Incident Response Management Plan
SARP	Spent Acid Regeneration Plant
SBS	Sodium bisulphite
Velocity EHS	Safety, Health, Environment and Community Incident Reporting System

1 INTRODUCTION

Ixom Port Kembla operates under Environment Protection Licence No. 549. NSW legislation requires all Environment Protection Licence holders to have a Pollution Incident Response Management Plan (PIRMP).

This document has been prepared in accordance with requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act).

It applies to all activities and operations of Ixom Port Kembla.

1.1 Relationships with Other Documents

The Environmental Management Plan for Port Kembla as well as the AECOM Report 60216391 (Stack Assessments) were reviewed.

This Plan should be read in conjunction with **Environmental Incident Notification Procedure – Port Kembla** which includes the statutory definition of a pollution event, and the **Checklist and Record of Regulator Notification**.

References are made to the **Emergency Response Plan** (MCW-PTK-PRO-EMG-001) for Port Kembla. It is important to note that not all pollution events are an emergency and not all emergencies are pollution events.

1.2 Plan Authority

The plan is issued on the authority of the Site Leader. Contact details are:

Street Address: Gate 1, Foreshore Road, Port Kembla NSW 2505

Telephone (Mon – Fri, Bus Hours): 02 4255 2700

24 hour contact: Ixom Emergency Response Service 1800 033 111

1.3 Document Control and Distribution

The master controlled copy of the PIRMP is on the Port Kembla Document Management System (DMS). Document control, revision, retention and authorisation are managed through the functionality of the DMS. All personnel have access to the plan via the DMS. There is a link to the plan on the Port Kembla Operation Intranet site <https://ixom365.sharepoint.com/sites/BLG/PortKemblaOperations/SitePages/Home.aspx>

A copy of this Plan is available at Gate 1 in the Emergency Information box and in the Control Room

Emergency Response section of the Ixom Port Kembla website <http://www.ixom.com/being-responsible/environmental-monitoring-data/port-kembla> has a redacted PDF copy of this plan. The full version is available on written request.

2 OBJECTIVES

This document aims to meet the following objectives outlined in the NSW EPA Guidelines for the Preparation of pollution incident response management plans (State of NSW and EPA, March 2012):

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the EPA, other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) 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; and
- 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 effectiveness in achieving these objectives.

3 LEGISLATIVE REQUIREMENTS

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

4 NATURE OF OPERATIONS

4.1 SARP (Spent Acid Regeneration Plant)

The SARP was a purpose sized and designed acid plant to enable environmentally sound regeneration of waste sulphuric acid from oil refineries in Eastern Australia. It is no longer in operation following closure of the refineries that were serviced.

4.2 SBS Manufacture

The SBS plant operates as a batch process to produce product 31% sodium bisulphite solution for customers such as the water treatment industry.

Sodium Bisulphite Solution Manufacture Process

- SMBS (sodium meta bisulphite) powder is added from bulk bags into a mixing tank containing water.
- The mixed solution is tested, and the concentration is adjusted by adding extra water or powder (if required) to meet the product quality specification.
- The product is then pumped into a holding tank ready for despatch to customers via bulk road tanker.

4.3 Acid Dilution

This plant operates as a batch process to produce one main dilute acid grade to order.

Dilute Sulphuric Acid Manufacture Process

- Fresh 98.5% sulphuric acid is transferred via road tanker from the imported acid terminal to the 98.5% storage tank in the dilution plant.
- Plant operators determine when a new batch of dilute acid (70% acid is the primary grade produced) is required and start the system up to produce it.
- The computerised control system in the plant then controls the ratio of water and acid to mix to produce the desired product acid concentration.
- The acid and water are mixed through a special mixing system which is cooled by cooling water circulating through a small cooling tower.
- The cooled product acid is then stored in a specially designed fibreglass storage tank ready for despatch to customer via bulk road tanker.

4.4 Acid trading

Customers for this acid include local steelmaking, electrical power generation, water treatment, other industrial chemical producers and repack facilities. A general description of the process and facilities follows:

The Process:

- Concentrated sulphuric acid (98.5%) is sourced from various locations around Australia and the world and is ordered in bulk for supply to Ixom Port Kembla.
- Large, specially designed chemical tanker ships are contracted to load the nominated tonnage of acid at the designated load port for delivery to Port Kembla as well as other Ixom terminals in other locations as required.
- Due to the time required to organise a suitable vessel to arrive at the load port, load and then sail to Port Kembla, these shipments are booked months in advance of requirements
- Once nominated the Port Kembla site is advised of the vessel's estimated time of arrival in port and planning for its arrival begins.
- When the vessel arrived in port it is berthed at the No. 4 Jetty , now known as Bulk Liquids Berth 206.
- Following a prescribed set of operating procedures Ixom's trained acid handling personnel connect the ship's discharge system to the shore pipeline) via specially designed chemical hoses.
- The acid is then transferred using the ship's on-board pumps to the Ixom shore tanks located on Foreshore Rd opposite No.3 Jetty.
- Acid is then stored in these tanks ready for despatch to customers in road bulk tankers through purpose designed tanker loading systems.



4.5 Acid Tanker Loading

In order to despatch bulk loads of sulphuric acid, whether manufactured or imported, from the Port Kembla site to customers, specialised sulphuric acid handling and loading systems are required. A brief description of these activities follows:

The Process:

- As mentioned in other sections of the site operations, concentrated acid is stored in dedicated, and purpose designed storage tanks ready for despatch to customers.
- Orders from customers are received and the relevant paperwork generated to allow specifically selected and fully trained and licensed chemical road tanker carriers to arrive on site to be loaded.
- Once an order is confirmed by Ixom operations personnel and the tanker driver positions the tanker beneath the road load out gantry ready for connection to the tanker loading system.
- Following a prescribed procedure, trained Ixom personnel, wearing the specialist personal protective equipment supplied, connect the tanker to the Ixom loading system via dedicated and purpose designed chemical hoses.

- A computer controlled batch loading system is then programmed to ensure the exact quantity of acid ordered and which can be legally carried by the relevant tanker is loaded into the tanker.
- The loading process is automatically managed by the control system and is supervised by Ixom operations personnel. The system is protected by the computer control system, a separate high level emergency shut off probe and a bunded area inside which the tanker is parked whilst loading. These systems ensure the safety of the personnel and protect the environment in the unlikely event of any spillage.

4.6 Waste Water Treatment Plant

The site operates a comprehensive wastewater treatment system which takes all liquid process waste generated on site. All liquid waste generated in operating areas on the site is treated for re-use in production processes. Stormwater from Area 3 bunds is tested and discharged via the sites single licensed discharge point described as LDP4 in the site's EPA licence.

Wastewater Treatment Plant Process

- Wastewater generated in process areas is collected and pumped to the treatment plant for processing.
- In the treatment plant the wastewater is filtered to remove colour and particulate material, producing a clean, clear filtrate.
- This clean filtrate is then held in a storage tank where it may be reused in the process.

Area 3 Stormwater Discharge Process

- The stormwater water is transferred to a batch tank in which automatic pH monitoring is installed.
- The discharge tank also continuously has instrumentation to measure the total suspended solids (TSS) of the stormwater, to ensure it is within range of the site licence.
- When the system registers the water in this tank as within the licensed parameters the tank discharge valve is opened to allow the stormwater to be discharged via the site's only liquid discharge point, LDP4.
- The pH, TSS, flow rate and volume are monitored throughout each discharge. The monitoring results are recorded every time the system discharges and are reported on this website as required to the EPA.

4.7 Staffing

The Port Kembla site operates the following hours:

- During normal business hours (6am to 4pm Monday to Friday), site occupancy will be approximately 4 people.
- The Area 5 tanker loading bay is available 24 hours per day 365 days per year for driver self-loading. Outside business hours it is not permanently staffed and is monitored by security guards.

- Staffing may vary periodically, including outside normal business hours. For example:
 - During shipping operations
 - Support personnel
 - Contract service providers
 - Labour for significant maintenance tasks
 - Project work

4.8 Neighbouring Facilities and the Community

The Port Kembla site is within the industrial section of the outer harbour and is surrounded by industrial neighbours – see *MCW-PTK-REC-EMG-004 Port Kembla Emergency Plan* (Location of The Facility, page 7).

5 HAZARD IDENTIFICATION AND RISK ASSESSMENT PROCESS

5.1 Environmental Aspects Identification – Scenario selection

The Environmental Management Plan has been reviewed.

5.2 Ixom Possible pollution sources

See Emergency Management Plan (Emergency Plan - Appendix F) for inventory of potential pollutants on the premises -

- the maximum quantity of any pollutant that is likely to be stored or held at particular locations;

Appendices A to F of this plan show description of the hazards to human health or the environment, the likelihood of any such hazards occurring, the likely pollution scenarios including the details of any conditions or events that could, or would increase that likelihood.

6 CONTROLS TO PREVENT AND MINIMISE THE IMPACT OF A POLLUTION INCIDENT

6.1 Pre-emptive actions to be taken (Controls)

Safety, Health and Environment is the number 1 priority for Ixom. Ixom's systems include measures to prevent and minimise incidents (including safety and pollution incidents) throughout the planning, development and implementation of our projects and operations.

6.2 Safety Equipment

Gas monitors located in SBS stack
 Portable gas monitor

Safety Showers
PPE including respirators for emergencies
Secondary containment including bunding
On site weather station

6.3 Minimising Harm to Persons on the Premises

The Port Kembla site has restricted access and all employees and contractors are required to undertake induction training before entering the site.

Visitors are accompanied by staff while on site.

Employees undertake specific SH&E training as well as procedure and work instruction training. Contractors can only work on site after a permit to work is issued and a JSERA completed and controls to minimize risks are implemented.

The integrity of the site's plant and equipment, PPE and maintenance programs are audited by Ixom Corporate as well as internal auditors. Housekeeping inspections and job cycle checks are regularly done and recorded

6.4 Actions to be Taken During or Immediately After a Pollution Event

The actions to be taken in response to an emergency are outlined in the Port Kembla Emergency Management Plan emergency scenarios appendices and the Notification Procedures.

See also Appendices A to F for detailed responses to potential pollution incidents

The only pollution event at the Ixom Port Kembla site with the potential for off-site impact on the general community, a sustained sulphur dioxide gas release from a sulphur fire, will be managed by Emergency Services as per Wollongong DISPLAN

In the event of a pollution discharge to stormwater and the Outer Harbour, Ixom will work with the Port authorities and Emergency Services to define the impacted area and the Emergency Services would prevent access to minimise harm.

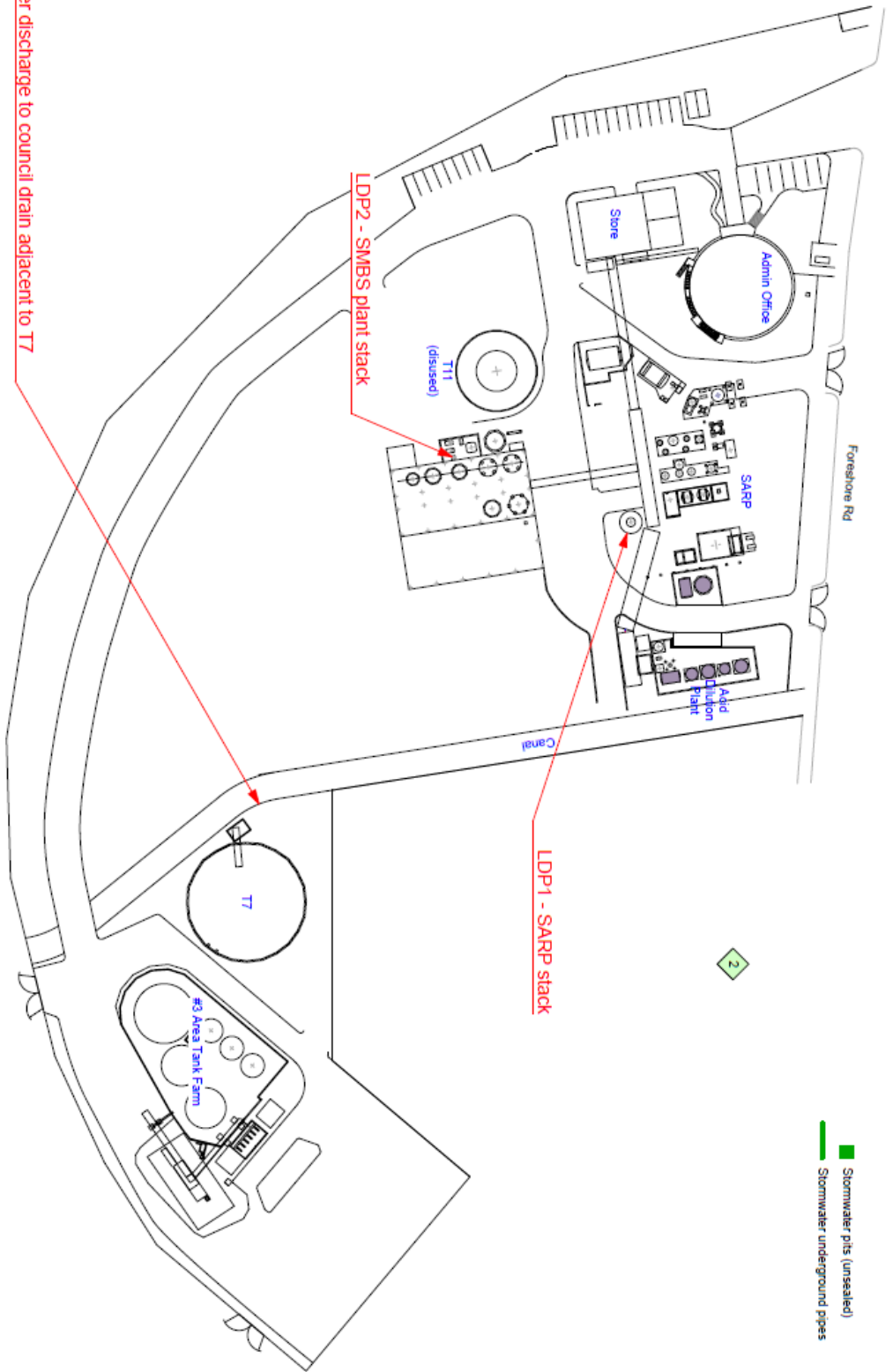
7 MAPS

7.1 List of Relevant Maps

- i. Stormwater – N17600.3 (below)
- ii. Surrounding area – see Appendix D - Emergency Response Management Plan

In the event of an air based pollution event Ixom will utilise these maps, in concert with wind direction and wind speed information, to estimate the geographical impact of the pollution events and this will then inform communication requirements.

The impact of a pollution of waters event would be estimated using information about the location of the discharge, the estimated volume of material discharged (based on the rate and duration).



■ Stormwater pits (unsealed)
— Stormwater underground pipes

LDP4 - Waste water discharge to council drain adjacent to T7

LDP2 - SMBS plant stack

LDP1 - SARP stack

For Information

IXOM

13/4/15		Changed to 100L	
DATE	TIME	REVISION	BY
IXOM - Port Kembla Site Emergency Information #3 / #4 Areas Licenced Discharge Points			
No. PN 1101 DWG 003 Title: N17600 Date: 13/4/15 Author: RPH Checker: RPH		Scale: 1 : 1 Drawing No: N17600 Project No:	

genesis cm
 Genesis CM Pty Ltd
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8 CONTACT DETAILS

See also Appendix A – Site Emergency Plan

8.1 Ixom Chemicals Port Kembla

Ixom PK staff with responsibilities under this Plan:

Position Titles	Name	24 Hour Contact Details	Responsible for Activating this Plan (Y or N)	Authorised to Notify relevant Authorities Under Notification of Pollution Incidents (Y or N)	Responsible for managing the Response to a Pollution Incident (Y or N)
Site Leader			Y	Y	Y
Control Room Operator			Y	Y	Y
Head of Regional Operations			Y	Y	N

8.2 Relevant Authorities

Section 148 of the POEO Act requires relevant authorities to be immediately contacted where a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened. Details for Authorities to be immediately contacted are listed in the Notification Procedure stored in the company DMS.

Government Agency – Immediate Contact List

The protocol for industry notification of pollution incidents specifies that the employer or any person carrying on activities in which a pollution incident occurs to immediately notify each of the following relevant authorities in the order specified when material harm to the environment is caused or threatened:

- 1) 000 – If the incident presents an immediate threat to human health or property. Fire Rescue NSW, the police and NSW Ambulance Service are the first responders responsible for controlling and containing incidents. In an emergency this may have already been completed by the emergency commander
- 2) If the incident does not require an initial combat agency (or once 000 has been called) notify the relevant authorities in the following order

- | | |
|--|--------------|
| a) EPA Environment Line - | 131 555 |
| b) NSW Health – | |
| Office Hours | 4221 6700 |
| Outside office hours (Request Environmental Officer) | 4222 5000 |
| c) SafeWork NSW (previously The Workcover Authority) | 131 050 |
| d) Local Council (Wollongong) | 4227 7111 |
| e) Fire and Rescue NSW | 1300 729 579 |

In case of an incident during shipping operations or potentially impacting NSW Ports land or assets

- | | |
|--|-----------|
| f) Port Authority of NSW – Vessel Traffic Services | 4275 0197 |
| g) NSW Ports – Port Operations Manager | |

For full details see Environmental Incident Notification Procedure and Checklist

9 COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

Ixom understands that there is a high level of community expectation around the notification of pollution events. This Section of the report outlines who is to be notified in the event of a pollution event, what methods will be used for making notifications and guidance on the content of notifications and updates.

9.1 Fast acting – Emergency Commander → Fire & Rescue → Police

9.2 Slow acting – Door knock/letterbox drop → Community Relations

9.3 Defining Who Is To Be Notified

The following groups may need to be notified in the event of a pollution event:

- Port Kembla Harbour Environment Group with members from industry, community, academic and government representatives.
- Local residents
- People under the care of others:
 - school children, St Patrick’s School at 45 Kembla St
 - aged (Cringila HACC Respite Centre at 32 Lake Avenue Cringila)
 - health care (Port Kembla Hospital Rehabilitation at Warrawong)
- Adjacent industry
- Workers in the area
- Visitors and people passing through the local area

In the event of a pollution incident, notifications will be made to those individuals potentially impacted or impacted. Refer to site Emergency Plan for contact details.

9.4 Notification Methods

9.4.1 Initial incident notification

In the event of a pollution event that is an emergency with the potential for off-site impact, the key means of community notification will be via Emergency Services.

Section 339 of the Illawarra Emergency Plan,

<http://www.wollongong.nsw.gov.au/emergency/Documents/Illawarra%20Emergency%20Management%20Plan.pdf> outlines Warning Arrangements

Acting on the advice of Fire & Rescue NSW Hazmat Controller (Police, Site Controller, LEOCON or REOCON)

Evacuation warnings, public safety directions and warnings relating to spillages.

Illawarra Shoalhaven Local Area Health/Public Health Unit) Provide health warnings in the event of persons being affected by hazardous materials.

Site Controller

A police officer appointed by and subject to the direction of an emergency operations controller to be responsible to determining the site, establishing site control and controlling on the ground response to an emergency. Until the Emergency Operations Controller appoints a Site Controller, the Senior Police Officer will assume control.

If a pollution event is not an emergency with potential for off-site impact the following notification methods will be utilised:

- Ixom Media releases
- Phone calls to industrial neighbours
- Website updates <http://www.ixom.com/being-responsible/environmental-monitoring-data/port-kembla> Door knocks in a defined geographical area if pollution event sustained and wind directions are directing it to residential areas.

One, some, or all of the above notification methods will be utilised, depending on the nature of an incident and the potential for impact on the community. The Incident Commander or delegate is responsible for determining the community notification method/s.

9.4.2 Follow up incident notification

An initial notification will be followed by an update (to the original recipients, or a smaller or larger group as deemed relevant) in the event that Ixom:

- determines that a new or different response is required by members of the community or site neighbours in response to the pollution incident; or
- decides to provide an update on the status of the investigation.

9.5 Notification Content

Notifications made under this plan are to be timely, clear and concise. Initial notifications may be followed with subsequent notifications and additional or more

detailed information over time as required. As a minimum, notifications should include:

- A brief statement on the nature and timing of the pollution incident (e.g. there has been a sulphur dioxide release)
- Which party is responsible for responding (e.g. Emergency Services are in attendance or the EPA has been advised)
- The action (if any) required by the recipient of the notification (e.g. you do not need to take any action, or will be advised by Emergency Services.
- Contact details for seeking further information (in most cases this will be the site 24 hr contact number (see section 1.2 above)
- or Company Spokesperson.

10 STAFF TRAINING

Relevant Ixom Port Kembla staff will be trained in the implementation of this Plan in order to ensure it is implemented as planned in the event of a pollution event.

All staff are trained in pollution incident response management plan, notification procedures and Emergency Plan annually

All records are maintained in site training database indefinitely.

Training records are maintained electronically under employee records in Ixom's Learning Management System found on our people site – Ixsite (provided by SAP Success Factors) accessible via Ixom intranet.

STAFF TRAINING

11 PLAN TESTING AND REVISIONS

Every 12 months this plan will be routinely tested using a pollution incident scenario and the plan reviewed.

This Plan will also be tested within one month of a pollution event, using a desktop exercise. This will ensure that learnings from the event debrief are incorporated into the Plan as required. Pollution event debriefs are included in the Incident report in Ixom Velocity EHS Incident Reporting database and any corrective actions will be raised in the Ixom Velocity EHS Action Management database.

The revision status on the cover of this Plan indicates the latest version and the date it was issued.

Summary of test and revision dates:

Date completed	Details	Involved
30 / 9 /16	Reviewed plan details, incorporated feedback from EPA PIRMP review on 23 August 2016, checked contact details on notification list to be current.	
22 / 9 /17	Reviewed plan details, reviewed findings from emergency desktop exercise on 16	

	March 2017 (no changes required), check contact list.	
24 / 9 /18	Reviewed plan details, checked contact details on notification list to be current. Reviewed training records all up to date. Updated map image to one with IXOM logo and included link to PK Ops intranet site. Completed scenario of leak on shipping pipeline. No changes needed.	
5/3/2019	Reviewed plan details, Updated contact details names and contact numbers.	
15/5/2020	Conducted emergency exercise (leak on flange during shipping) and updated PIRPM – checked contact details.	
29/6/2021	Reviewed plan details and updated contact list – prepared redacted version for online publication.	
30/9/21	Reviewed plan details, reviewed findings from emergency desktop exercise on 30 Sep 2021 (no changes required), checked contact list. Reviewed training records all up to date.	
15/6/22	Update plan based on changes to site with SARP closure and NSW Ports feedback recommendations.	
17/1/2023	Investigation and review of response plans following Incident on 12 January 2023	
8/3/2023	Update of plan after review following testing and investigation in January	

12 LIST OF APPENDICES

A Sulphuric Acid Pollution Incident Scenario



PIRMP Appendix A
Sulphuric Acid.docx

B no longer relevant (Spent Sulphuric Acid Incident Scenario)

C Caustic Soda Pollution Incident Scenario



PIRMP Appendix C
Caustic Soda.docx

D no longer relevant (Sulphur Oxides Pollution Incident Scenario)

E no longer relevant (Molten Sulphur Pollution Incident Scenario)

F SBS Pollution Incident Scenario



PIRMP Appendix F
SBS.docx

Table 1: What could affect the Community

Table 1: What could affect the Community

What are the types of potential pollution incidents?	What is the likelihood of the pollution incident occurring?	Who or what is likely to be affected and to what extent?	How will the site notify the community?	What actions do I need to take to minimise harm?
Discharge of sulphuric acid to stormwater drains, bypassing secondary containment	<p>Very unlikely</p> <p>Could be caused by tank or pipe failure.</p> <p>Unlikely to impact downstream users as stormwater runs into outer harbour and site has secondary containment.</p>	<p>Site</p> <p>Storm water drain and outer harbour</p>	<p>Telephone Port Authority</p> <p>Emergency services will advise wider community if required.</p> <p>Website will be used for updates</p>	<p>Stay away from liquid clean up area</p> <p>Industrial neighbours and passers-by should follow advice from site and emergency services.</p>
Contaminated Storm water (low pH)	<p>Very unlikely</p> <p>Heavy rain event for a continued period may increase the likelihood</p> <p>No downstream users</p> <p>Site has secondary containment.</p>	<p>Storm water channel and harbour</p>	<p>Telephone Port Authority</p> <p>Emergency services will advise wider community if required</p> <p>Website will be used for updates</p>	<p>Avoid channel entrance to harbour</p> <p>Industrial neighbours and passers-by should follow advice from site and emergency services.</p>
Sulphuric acid leak to harbour during shipping operations	<p>Very unlikely</p> <p>Pipeline and hoses are routinely tested, maintained and monitored for leaks during operation.</p> <p>In the event of a leak pumping operations would immediately cease, minimising any impact.</p>	<p>Outer harbour in vicinity of berth 206 (Jetty #4)</p>	<p>Telephone port authorities.</p> <p>Emergency services will advise wider community if required</p> <p>Website or press releases may be used for updates</p>	<p>Avoid vicinity of berth 206.</p> <p>Industrial neighbours and passers-by should follow advice from site and emergency services.</p>