

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459 Page 1 of 24

Contents

	[Defini	tions	3
1.	I	NTRO	DUCTION	4
	1.1	· Pι	ırpose	4
	1.2	Ba	ackground	4
	1.3	Sc	ope	4
	1.4	Ol	ojectives	5
2.	F	RESPC	NSIBILITIES	6
3.	L	EGISI	ATIVE AND OTHER REQUIREMENTS	7
	3.1	Le	gislative Requirements	7
	3	3.1.1	Work Health and Safety Act 2011	7
	3	3.1.1.	Part 2 – Item: 19 Primary duty of care	7
	3	3.1.1.2	Part 3 – Item 35: What is a notifiable incident	8
	3	3.1.1.3	Part 3 – Item 36: What is a "serious injury or illness" (relating to fire)	8
	3	3.1.1.4	Part 3 – Item 37: What is a "dangerous incident" (relating to fire)	8
	3	3.1.1.5	Part 3 – Item 38: Duty to notify notifiable incidents	9
	3	3.1.2	Work Health and Safety Regulation 2011	9
	3	3.1.2.2	Clause 355 – Specific Control – fire and explosion	9
	3	3.1.2.2	Clause 355 – Fire protection and firefighting equipment	. 10
	3	3.1.3	Environmental Planning and Assessment Regulation 2000	. 10
	3	3.1.4	Dangerous Goods Regulation 2014	10
	3	3.1.5	Rural Fires Act 1997	. 11
	3.2	Er	vironmental Protection Licence Requirements	11
	3.3	De	epartment of Planning, Industry and Environment: 2009 Approval Conditions	11
	3	3.3.1	Conditions 21 and 22 – Fire Control	11
	3.4	Po	olicies and Standards	. 13
4.	9	SITE O	PERATIONS	14
	4.1	Al	E Site Interactions with PKCT	14
5.	ľ	MANA	GEMENT STRATEGY	. 17
	5.1	. O _I	perational Activities and Potential Issues	. 17
	5.2	Er	vironmental Aspects and Impacts	17

This is a Controlled Document in SharePoint Controlled Documents Library

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459

Page 2 of 24

	5.3	Risk and Change Management	17
	5.4	Asset Management	17
	5.5	Operations	18
	5.6	Training, Competencies, Drills	18
	5.7	Management Strategy Effectiveness and Improvement	1
6.	. E\	VENT MANAGEMENT	2
	6.1	Emergency Response and Investigation	2
		IONITORING	
		OMPLAINTS RECORDING AND REPORTING	
_	Di	FFFFNOTC	_

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459

Page 3 of 24

Version	Date	Reviewer	Comments
10	14 th	Luke Pascot	Review following 2020 Triennial Independent Audit, no material
	September		changes, no suggestions made by auditors, only minor updates
	2020		
11	12 th	Luke Pascot	Review and update following DPIE RFI and PKCT site separation
	February		for AIE site.
	2021		
12	14 th	Michael Curley	Annual review – no changes made.
	September		
	2022		
13	21st August	Luke Pascot	Annual review – no material changes made. Updates to document I.D's
	2023		where required.
14	5 th	Luke Pascot	Annual review – no material changes made. Updates to document I.D's
	September		where required.
	2024		

Definitions

DPIE refers to the Department of Planning, Industry and the Environment

EPA refers to the Environment Protection Authority

EPL refers to Environment Protection Licence

NSWP refers to NSW Ports

PKCT refers to Port Kembla Coal Terminal

PRP refers to Pollution Reduction Program

WCC refers to Wollongong City Council

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459 Page 4 of 24

1. INTRODUCTION

1.1 Purpose

The purpose of this Fire Management Plan (FMP) is to outline Port Kembla Coal Terminal's (PKCT's) processes for managing its fire protection equipment and the required actions of persons conducting business or undertaking/s (PCBU's), in the event of a fire.

This Management Plan seeks to ensure that PKCT has appropriate fire fighting equipment onsite in suitable locations and to ensure that PKCT personnel are informed, trained and competent relating to their responsibility and duties in the event of a fire.

1.2 Background

Port Kembla Coal Terminal (PKCT) provides a coal product receival, storage and shipping loading service to its customers. PKCT is located on the northern side of the inner harbour and operates premises leased from NSW Ports (NSWP).

PKCT has been in operation since 1990 and operates under an Environment Protection Licence (EPL) No. 1625 in accordance with the *Protection of the Environment Operations Act 1997* (POEO Act).

In June 2009, the Department of Planning and Environment (formerly Department of Planning and Infrastructure) (DoPE) set new approval conditions for PKCT's operations as part of the development consent under Part 3A of the *Environmental Planning & Assessment Act 1979*, for PKCT's Existing Operations & Increased Road Receival Hours Major Development application (08 0009).

Australian Industrial Energy (AIE) is working to develop Australia's first liquefied natural gas (LNG) import terminal at PKCT's Berth 101. PKCT has reached a commercial agreement with NSW Ports and AIE to surrender the southern area of its lease for AIE to construct and operate the LNG import terminal. The date of surrender is 31/03/2021. The impact of this surrender and the changes in the context of fire management are unknown at the time of publication of this revised FMP. Refer to further details in Section 4.1 of this FMP.

1.3 Scope

This FMP applies to PKCT premises and site operations, ensuring that PKCT:

- Retains and maintains suitable fire fighting equipment to respond to an onsite fire; and
- Documents its fire response procedures and trains staff appropriately to protect themselves in case of fire and to allow the greatest level of assistance to fire and emergency services in the event of an onsite fire.

Fire Management Plan



MP.019 Status: Pending Version: 14 Doc ID: 459 Page 5 of 24

Management Plan

1.4 Objectives

The objectives of this FMP are to:-

- Identify potential fire causing activities on the PKCT site and the likelihood of the fire that could eventuate
- Identify and document fire fighting equipment that is suitable for the detection and suppression of the potential fire
- Identify and document suitable locations for fire fighting equipment at PKCT premises.
- Document the PKCT response procedure in relation to a fire onsite
- Document staff training requirements for fire safety and fire response
- Document intervals for a review of this FMP and the procedures contained herein.

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459 Page 6 of 24

2. RESPONSIBILITIES

The roles and responsibilities relevant to environmental management at PKCT are defined in Table 1 below.

Table 1 Responsibilities

Role	Responsibility
PKCT employees, contractors and site personnel	All PKCT employees, contractors and other site personnel are responsible to comply with this management plan. PKCT employees, contractors and other site personnel must take appropriate action detailed in this management plan in accordance with PKCT's legal and environmental obligations.
Environmental Specialist	Is responsible to the HSER Lead for the coordination and implementation of the management plan to PKCT site operations.
Health Safety Environment and Risk (HSER) Lead	Is responsible to the General Manager for site monitoring and operation of environmental control systems.
Operations Manager	Is responsible for managing and supporting the shift and daywork teams to effectively and safely operate the business in line with customer, community and regulator expectations.
Maintenance Superintendent	Is responsible to the General Manager for work execution ensuring environmental control equipment is maintained, reliable and effective.
Asset Manager	Is responsible for asset management and planning, ensuring environmental control equipment is fit for purpose, reliable and effective.
General Manager	Is accountable for PKCT's legal and environmental compliance.

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14

Doc ID: 459 Page 7 of 24

3. LEGISLATIVE AND OTHER REQUIREMENTS

3.1 Legislative Requirements

3.1.1 Work Health and Safety Act 2011

The management of safety from fire events at the PKCT premises is covered by legislation under the *Work Health and Safety Act 2011* (WHS Act 2011) and *Work Health and Safety Regulation 2011* (WHS Regulation 2011). The sections detailed below outline the legislative obligations required by PKCT to adhere to at the site.

3.1.1.1 Part 2 – Item: 19 Primary duty of care

- (1) A person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of:
 - (a) workers engaged, or caused to be engaged by the person, and
- (b) workers whose activities in carrying out work are influenced or directed by the person, while the workers are at work in the business or undertaking.
- (2) A person conducting a business or undertaking must ensure, so far as is reasonably practicable, that the health and safety of other persons is not put at risk from work carried out as part of the conduct of the business or undertaking.
- (3) Without limiting subsections (1) and (2), a person conducting a business or undertaking must ensure, so far as is reasonably practicable:
 - (a) the provision and maintenance of a work environment without risks to health and safety, and
 - (b) the provision and maintenance of safe plant and structures, and
 - (c) the provision and maintenance of safe systems of work, and
 - (d) the safe use, handling, and storage of plant, structures and substances, and
 - (e) the provision of adequate facilities for the welfare at work of workers in carrying out work for the business or undertaking, including ensuring access to those facilities, and
 - (f) the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking, and
 - (g) that the health of workers and the conditions at the workplace are monitored for the purpose of preventing illness or injury of workers arising from the conduct of the business or undertaking.

(4) If:

- (a) a worker occupies accommodation that is owned by or under the management or control of the person conducting the business or undertaking, and
- (b) the occupancy is necessary for the purposes of the worker's engagement because other accommodation is not reasonably available, the person conducting the business or undertaking

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459 Page 8 of 24

must, so far as is reasonably practicable, maintain the premises so that the worker occupying the premises is not exposed to risks to health and safety.

(5) A self-employed person must ensure, so far as is reasonably practicable, his or her own health and safety while at work.

Note. A self-employed person is also a person conducting a business or undertaking for the purposes of this section.

3.1.1.2 Part 3 – Item 35: What is a notifiable incident

The above Primary Duty of Care, among other requirements of the WHS Act, requires PKCT to control potential fire causing activities at the PKCT, as well as notifying the regulator (NSW WorkCover) of any "notifiable incident", which under *Part 3 - Incident Notification* of the WHS Act 2011, is catergorised as follows:

In this Act, *notifiable incident* means:

- (a) the death of a person, or
- (b) a serious injury or illness of a person, or
- (c) a dangerous incident.

3.1.1.3 Part 3 – Item 36: What is a "serious injury or illness" (relating to fire)

Under Part 3, *serious injury or illness* of a person means an injury or illness requiring the person to have:

- (a) immediate treatment as an in-patient in a hospital, or
- (b) immediate treatment for:
 - (iv) ...a serious burn...
- (c) medical treatment within 48 hours of exposure to a substance,

This also includes any other injury or illness prescribed by the regulations but does not include any illness or injury of a prescribed kind.

<u>Note:</u> the above is the excerpt from the WHS Act that is specifically relevant under this Fire Management Plan

3.1.1.4 Part 3 – Item 37: What is a "dangerous incident" (relating to fire)

Under Part 3, Clause 37 of the WHS Act 2011 a "dangerous incident" means an incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person's health or safety emanating from immediate or imminent exposure to:

(b) ...an uncontrolled implosion, explosion or fire... but does not include any illness or injury of a prescribed kind.

Note: the above is the excerpt from the WHS Act that is specifically relevant under this Fire.

Fire Management Plan



MP.019 Status: Pending Version: 14 Doc ID: 459 Page 9 of 24

Management Plan

3.1.1.5 Part 3 – Item 38: Duty to notify notifiable incidents

Under **Part 3, Clause 38** of the WHS Act 2011 the following requirements need to be considered in relation to specific notification requirements:

- (1) A person who conducts a business or undertaking must ensure that the regulator is notified immediately after becoming aware that a notifiable incident arising out of the conduct of the business or undertaking has occurred.
- (2) The notice must be given in accordance with this section and by the fastest possible means.
- (3) The notice must be given:
 - (a) by telephone, or
 - (b) in writing.

Example. The written notice can be given by facsimile, email or other electronic means.

- (4) A person giving notice by telephone must:
 - (a) give the details of the incident requested by the regulator, and
 - (b) if required by the regulator, give a written notice of the incident within 48 hours of that requirement being made.
- (5) A written notice must be in a form, or contain the details, approved by the regulator.
- (6) If the regulator receives a notice by telephone and a written notice is not required, the regulator must give the person conducting the business or undertaking:
 - (a) details of the information received, or
 - (b) an acknowledgement of receiving the notice.
- (7) A person conducting a business or undertaking must keep a record of each notifiable incident for at least 5 years from the day that notice of the incident is given to the regulator under this section.

3.1.2 Work Health and Safety Regulation 2011

The WHS Regulation 2011 supports the WHS Act 2011 through the provision of more detailed requirements and the following extract from *Subdivision 1* "General obligations relating to management of risk" which includes clauses 355 and 359, are pertinent to fire management at PKCT and are described below.

3.1.2.1 Clause 355 – Specific Control – fire and explosion

A person conducting a business or undertaking at a workplace must, if there is a possibility of fire or explosion in a hazardous area being caused by an ignition source being introduced into the area, ensure that the ignition source is not introduced into the area (from outside or within the space). described below.

Fire Management Plan



MP.019 Status: Pending Version: 14 Doc ID: 459 Page 10 of 24

Clause 355 - Fire protection and firefighting equipment

- (1) A person conducting a business or undertaking at a workplace must ensure the following:
 - (a) the workplace is provided with fire protection and firefighting equipment that is designed and built for the types of hazardous chemicals at the workplace in the quantities in which they are used, handled, generated or stored at the workplace, and the conditions under which they are used, handled, generated or stored, having regard to:
 - (i) the fire load of the hazardous chemicals, and
 - (ii) the fire load from other sources, and
 - (iii) the compatibility of the hazardous chemicals with other substances and mixtures at the workplace,
 - (b) the fire protection and firefighting equipment is compatible with firefighting equipment used by the primary emergency services organisation,
 - (c) the fire protection and firefighting equipment is properly installed, tested and maintained,
 - (d) a dated record is kept of the latest testing results and maintenance until the next test is conducted.
- (2) If a part of the fire protection and firefighting equipment provided at the workplace becomes unserviceable or inoperative, the person must ensure that:
 - (a) the implications of the equipment being unserviceable or inoperative are assessed, and
 - (b) for risks that were controlled by the equipment when functioning fully, alternative measures are taken to manage the risks.
- (3) The person must ensure that the fire protection and firefighting equipment is returned to full operation as soon as practicable.

Environmental Planning and Assessment Regulation 2000 3.1.3

The Environment Planning and Assessment Regulation 2000 includes provisions pertaining to fire. Provisions include the requirement to supply an Annual Fire Safety Statement (AFSS) covering designated fire protection equipment. For PKCT, the regulator is Wollongong City Council. An AFSS is required for PKCT's automatic fire alarm monitoring communications link to Fire and Rescue NSW. The AFSS is due in March, annually, and must be supported by a System Condition Report, that will be supplied by PKCT's nominated service provider.

3.1.4 Dangerous Goods Regulation 2014

Dangerous Goods regulations require SafeWork NSW notification if a dangerous good exceeds manifest quantity. Generally, dangerous goods held on site are below manifest level. Inergen, a non hazardous compressed gas, is used on site for fire suppression. If the quantity of Inergen held on site exceeds manifest quantity i.e. 10,000 litres, a notification will be submitted to SafeWork NSW together with the following:

(a) An emergency plan submitted to Fire and Rescue NSW.

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459 Page 11 of 24

- (b) Two manifest boxes, which contain information for emergency services, are located on site at PKCT at the following locations:
 - (1) East wall of pump house adjacent to the main boom gate; and
 - (2) In Administration Building foyer adjacent to the fire indicator panel.

3.1.5 Rural Fires Act 1997

The Rural Fires Act 1997 provides for Total Fire Bans to be declared when there is an intolerable fire risk. In NSW, Total Fire Bans are declared by the NSW Rural Fire Serves Commissioner. During a Total Fire Ban, it is not permitted to light, maintain or use fire in the open or carry out any activity in the open that causes, or is likely to cause, a fire. No general purpose hot works, such as welding and cutting can be done in the open. Exemption may be sought if an entity believes it has appropriate controls in place.

As part of operations, PKCT regularly conducts various forms of hot work and many of the areas on site are open. To enable continuity of operations, PKCT may seek exemption. With the necessary controls in place, it may be prudent to do this annually, at the start of spring/ summer seasons.

Significant penalties and fines are applicable for individuals and the body corporate, not complying with the requirements of these statutory instruments.

3.2 Environmental Protection Licence Requirements

PKCT is licenced by the NSW EPA under the POEO Act 1997. This licence is reviewed at least every 5 years after the issue of the EPL. There are no specific EPL requirements pertaining to fire. There are provisions, however, related to causing pollution and requirements for competent operations and maintenance of facilities.

It is noted that a fire event and the associated emergency response may result in air emissions and onsite and offsite discharges which will have environmental impacts and may require notification and other actions pertaining to PKCT's environmental obligations.

3.3 Department of Planning, Industry and Environment: 2009 Approval Conditions

On the 12th June 2009, the Minister for Planning approved a Project Application (08_0009) which was submitted by PKCT to change receival arrangements. The project approved by the Minister was defined as the development described in the environmental assessment. The project was approved with conditions, including a requirement for PKCT to prepare and implement strategies to control fire.

3.3.1 Conditions 21 and 22 - Fire Control

Conditions 21 and 22 identifies the key details to effectively respond to, and manage fire incidents, Table 2 below summarises the conditions and identifies where the condition details are addressed in this plan.

Fire Management Plan



Management Plan MP.019 Status: Pending

Version: 14 Doc ID: 459 Page 12 of 24

This is a Controlled Document in SharePoint Controlled Documents Library

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459 Page 13 of 24

Table 2 Condition of Approval (Conditions 21 and 22)

Condition Details	Area addressed
Condition Details	in AQMP
21 The Proponent shall:	Section 5 & 7

- a) ensure that it maintains suitable equipment to respond to any fires on site; and
- b) assist the fire and emergency services as much as possible if there is a fire on site.

21. The Proponent shall The Proponent shall ensure that it maintains a Fire Management Plan for the site.

This FMP is designed to meet these requirements by identifying necessary equipment, their location and providing a fire response plan to ensure staff are kept safe, assist, or at least do not hinder, emergency services in the event of a fire.

3.4 Policies and Standards

PKCT is managed by South32 (Illawarra Coal) and has a management system in place which operates in accordance with its Work, Health and Safety (WHS) Policy (PO.001), Sustainable Development Policy (PO.003), Environment Policy (PO.002) and Quality Policy (PO.004). PKCT's compliance with Australian Standards or other regulations for fire management will be managed in consultation with PKCT's nominated service provider.

These policies are summarised in Table 3 below.

Table 3 PKCT Policies and Standards

Table 3 FRCT Folicies and Standards				
Policy / Standard	Description			
Work Health and Safety	The WHS policy outlines the commitment PKCT commits to enuring an safe, and			
Policy	injury free workplace to all staff and visitors. PKCT operates with a well			
	maintained and effective Health and Safety Management System within our			
	HSEC framework which includes the following key concepts:			
	 Identify, assess and manage risk to employees, contractors (including labour hire) visitors, the public and the environment Establish measurable objectives and targets to ensure continual improvement aimed at elimination work-related injury and illness and the protection of the environment in which PKCT operates Provide training, information and supervision of health, safety to all employees, contractors (including labour hire) visitors and the public 			
Sustainable	The sustainable development policy outlines the objectives PKCT undertake to			
Development Policy	ensure site operations are undertaken in a sustainable manner which considers			
	the following key concepts:			
	 The health and safety values of PKCT staff, contractors and site personnel 			

This is a Controlled Document in SharePoint Controlled Documents Library

UNCONTROLLED IF VIEWED OUTSIDE OF SHAREPOINT; valid for 48 Hours from time printed

AUTHORISED BY: Michael Curley, Health Safety Environment & Risk Lead - Date Authorised: 27/09/2024

Fire Management Plan



MP.019 Status: Pending Version: 14 Doc ID: 459 Page 14 of 24

Management Plan

- Set and achieve sustainable development targets with respect to energy and water efficiency targets which promotes the efficient use of resources and include reducing and preventing pollution throughout the lifecycle of PKCT products
- Develop partnerships that foster the sustainable development of our local communities, enhance economic benefits from our operations
- Ongoing consultation with customers, employees, indigenous land owners and the local community
- Provide appropriate information, instruction, training and supervision of health, safety to all employees, contractors (including labour hire) visitors and the public
- Establish measurable objectives and targets to ensure continual improvement aimed at elimination work-related injury and illness and the protection of the environment in which PKCT operates.

Environmental Policy

The environmental policy outlines PKCT's commitment to improved environmental performance and ensuring site operations are undertaken in an environmentally responsible manner which includes:

- Understanding and controlling impacts of site operations on the environment and community
- Maintain the highest possible standards of environmental management and monitoring
- Compliance with regulatory requirements, conditions of approval and licence conditions
- Ongoing consultation with customers, employees, indigenous land owners and the local community.

Quality Policy

PKCT Business Management System provides a framework for managing quality and establishing, achieving and reviewing quality objectives in compliance with the requirements of AS/NZS ISO 9001:2016 and ISO 14001:2015. PKCT staff, contractors and site personnel will fulfil the requirements detailed in the AS/NZS ISO 9001:2016 and ISO 14001:2015 and continually seek opportunities to improve system effectiveness.

4. SITE OPERATIONS

4.1 AIE Site Interactions with PKCT

Australian Industrial Energy (AIE) is working to develop Australia's first liquefied natural gas (LNG) import terminal at PKCT's Berth 101. PKCT has reached a commercial agreement with NSW Ports and AIE to surrender the southern area of its lease for AIE to construct and operate the LNG import terminal. The date of surrender is 31/03/2021. The revised site boundary for PKCT, as shown in Figure 1 has resulted in a change in PKCT's site operations, infrastructure and environmental management strategies.

The changes include:

This is a Controlled Document in SharePoint Controlled Documents Library

Fire Management Plan



Management Plan MP.019 Status: Pending Version: 14 Doc ID: 459 Page 15 of 24

- Reduced lease area due to the surrender of the Bulk Products Area, Berth 101 and Seawall Road
- The removal of five (5) collection ponds / sumps and two (2) wet weather discharge points from the PKCT Contaminated Water Collection Treatment System (CWCT), which include:
 - Pump 1 Southern Pond (wet weather discharge point)
 - Pump 8 T3 Pond (wet weather discharge point)
 - o Pump 9 Conveyor C7 Sump
 - o Pump 16 Berth 101 North Sump
 - o Pump 17 Berth 101 South Sump
- The addition of two (2) collection ponds / sumps and two (2) wet weather discharge points to the CWCT System, which include:
 - Pump 24 TS8 Sump (wet weather discharge point)
 - o Pump 25 South Eastern Pond (wet weather discharge point)
- Amendment to the Air Quality Monitoring network which includes the relocation of the southernmost continuous dust monitor (nominated as C1)
- Traffic management and site access arrangements from the southern end of the revised PKCT site boundary.

The impact of the surrender and the changes in the context of fire management are unknown at the time of publication of this revised FMP, due to the limited detailed engineering and operational information available from AIE. At this stage, this FMP has been written without consideration of changes that may be required in PKCT's fire management processes and procedures for AIE's construction and operational activities. This FMP will need to be reviewed in detail when information does become available from AIE.

When the above has been resolved, PKCT and AIE will work collaboratively during the operation of the AIE site to ensure environmental obligations are met, site operations for PKCT and AIE can be run effectively and safely, and any issues raised are dealt with in a timely manner.

Fire Management Plan



MP.019 Status: Pending Version: 14 Doc ID: 459 Page 16 of 24

Management Plan

Figure 1: PKCT Site Layout



Fire Management Plan



MP.019 Status: Pending Version: 14 Doc ID: 459 Page 17 of 24

Management Plan

5. MANAGEMENT STRATEGY

5.1 Operational Activities and Potential Issues

The following activities at PKCT have the potential to cause a fire hazard:

- Electrical equipment, wiring and cabling;
- Operating conveyors, rollers;
- Stackers, reclaimers and ship loaders;
- Friction in general associated with moving components;
- Hot work including welding, oxy cutting and grindings;
- Flammable and combustible materials including, coal, fuel;
- Mobile plant operations/ vehicle movements;
- Coal stockpiles/ internal combustion;
- Coal build up under belts.

PKCT's Risk Register documents the potential risk and controls that are in place to mitigate these risks in the case of a fire event.

5.2 Environmental Aspects and Impacts

Potential for fire incidents occuring on site is recognised as an important environmental aspect as identified in the *Environmental Aspects and Impacts Register* (RG.001). Fire incidents provide a number of adverse environmental impacts including:-

- Air emissions
- Contaminated water discharges on land and to waterway
- Waste generation.

5.3 Risk and Change Management

Processes are in place for the identification, evaluation and control of hazards associated with site operations and associated activities. Risk assessments are carried out at strategic and operational levels to ensure risks, such as fire are considered and satisfactorily controlled.

5.4 Asset Management

Site assets, structures and equipment are provided, maintained and managed to minimise the likelihood of fire. PKCT has a Works and Assets Maintenance system in place to drive preventative maintenance. Fire protection equipment includes:-

- Fire detection and alarming;
- Fire suppression sprinklers, fire extinguishers, gas flooding;
- Portable fire extinguishers;

Fire Management Plan



MP.019 Status: Pending Version: 14 Doc ID: 459 Page 18 of 24

Fire hose reels.

Fire protection equipment is monitored, inspected and maintained in accordance with site and legal requirements including Australian Standards where applicable. Fire fighting equipment is located across the PKCT site, and is shown in Figure 2 below.

5.5 **Operations**

Site operations and activities are carried out with consideration of hazards, including fire. Contractor's work is controlled through a preferred contractor process, an Authority to Work system and PKCT and contractor personnel are required to plan tasks. Planning includes assessment, communicate and coordination through Job Safety Environment Analysis, Take Two and toolbox meetings. Particular attention is given to hot work.

Key procedures relating to fire are as follows:

- Fire System Isolations PR.HS.104
- Action when fire is spotted PR.HS.9
- Use of Fire Extinguishers PR.HS.305.

5.6 **Training, Competencies, Drills**

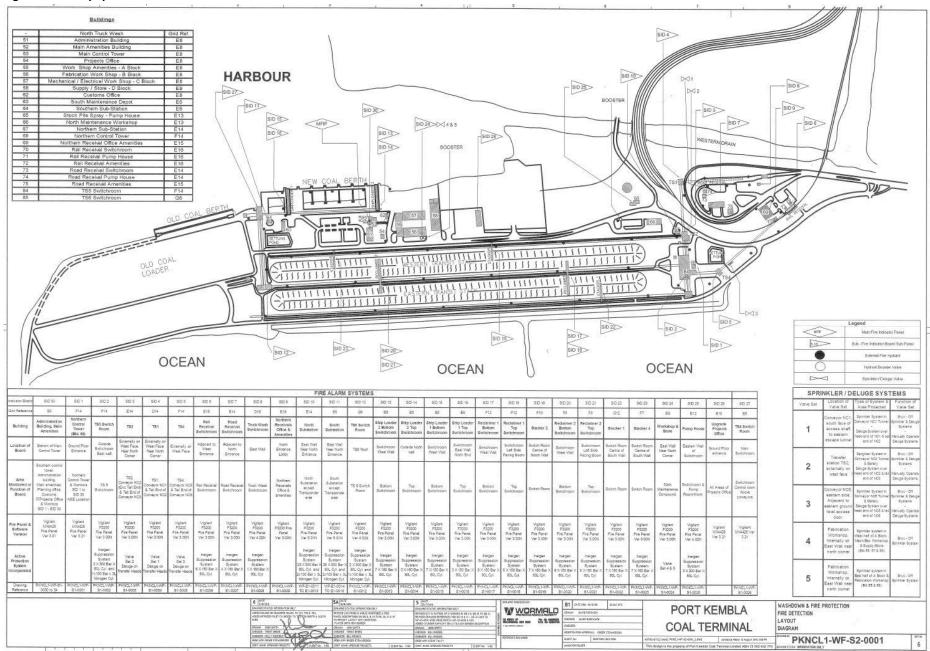
The Operations Manager shall liaise with PKCT staff and relevant contractors to ensure that appropriate fire protection equipment is available, information is available and appropriate training is given. Site personnel are provided periodic training and instruction in the following to ensure competency:

- Safety awareness;
- Fire extinguisher training;
- Emergency procedures;
- Drills/ exercises;
- Hazard identification/ evaluation;
- Reporting and notification requirements;
- Fire system isolations.

Training in emergency response includes, but is not limited to, the following:

- Decision making to fight a fire or evacuate the premises;
- How to raise an alarm
- What are notifiable events and who needs be notified;
- Process for contacting emergency services and what information to provide;
- Evacuation points if a direction to evacuate is given;
- Responsible for liaison with emergency services and the information to have readily available;
- PKCT staff to not interfere with emergency service personnel.

Figure 2: Fire Equipment Location



PORT KEMBLA COAL TERMINAL HSEC

Fire Management Plan



Printed By:

Management Plan MP.HS.459 Status: Pending Version: 14

Doc ID: 459
Page 1 of 24

5.7 Management Strategy Effectiveness and Improvement

Effectiveness of existing controls shall be evaluated through management reviews, processes such as audits, reviews, risk assessments and site observations. PKCT's insurers also visit periodically assessing PKCT's fire management capability and assisting to identifying appropriate improvements.

Improvements may be developed at an operational level but also strategically through management reviews and PKCT's business planning process and capital works program as follows:-

- Major upgrades through the Business Planning and Capital Works process;
- Major remedial actions through PKCT's asset management program;
- At an operational level, minor improvements or actions may be undertaken within defined authorisation levels.

Management reviews are primarily undertaken as follows:

- Business Planning 5 year strategic and annual business plans (financial year) developed identifying improvements projects;
- Business Management System Reviews quarterly system reviews. Inputs include legal compliance, ISO14001 and environmental matters.

PORT KEMBLA COAL TERMINAL HSEC

Fire Management Plan



Management Plan MP.HS.459 Status: Pending

Version: 14 Doc ID: 459 Page 2 of 24

6. EVENT MANAGEMENT

6.1 Emergency Response and Investigation

PKCT has emergency response processes in place in case of a fire incident occurring at the site. These processes provide for an immediate response in terms of mobilising site personnel and arranging emergency services, and for action to be taken to mitigate impacts.

In terms of emergency services:

- An emergency plan has been submitted to Fire and Rescue NSW.
- Two manifest boxes, which contain information for emergency services, are located on site at PKCT at the following locations:
 - East wall of pump house adjacent to the main boom gate; and
 - o In Administration Building foyer adjacent to the fire indicator panel.

Events are investigated to develop corrective actions. Events and actions are managed through PKCT's event management system.

The Emergency Management Plan (MP.001) outlines the emergency activation and response process at the PKCT site. The Emergency Management Plan is supported by the Pollution Incident Response Management Plan (MP.013) which outlines response measures to an environmental pollution event.

Printed By:

PORT KEMBLA COAL TERMINAL HSEC

Fire Management Plan



Management Plan MP.HS.459 Status: Pending

Version: 14 Doc ID: 459 Page 3 of 24

7. MONITORING

PKCT operates 24 hours/ 7 days per week. Monitoring and site control is provided by the Main Control Room (MCR). MCR personnel's responsibilities include site surveillance (direct visual / cameras), focal point for notifications if fire is spotted, and activation of an emergency response.

Fire detection systems are in place at various locations on site including electrical equipment rooms, some transfer stations, workshops, store, some buildings. These detection systems activate automatic fire alarms. Refer to Figure 2, as referenced in Section 5.4, for more details.

PKCT will monitor the success of staff response to a fire drill to assist in deciding if this FMP or any PKCT fire response processes and/or procedures require alteration. Following a fire event at the premises, PKCT will review the success of this FMP and associated processes and/or procedures in dealing with the event.

PORT KEMBLA COAL TERMINAL HSEC

Fire Management Plan



Management Plan MP.HS.459 Status: Pending Version: 14

Doc ID: 459 Page 4 of 24

8. COMPLAINTS RECORDING AND REPORTING

PKCT has a 24 hour, 7 day free call community hotline number (1800 111448) and email link i.e. communitylinks@pkct.com.au which is advertised on the PKCT website (refer www.pkct.com.au). This provides a mechanism by which complaints and general enquiries regarding the environment or community issues associated with operational activities can be managed.

PKCT has a Community and Stakeholder Management Procedure (PR.055) process in place which ensures complaints are recorded, registered and investigated. Where appropriate, corrective actions are developed and implemented.

Incident reporting, submission and publication of this FMP shall be in accordance with the conditions of approval in the 2009 Major Project 08_0009 Application.

NSW WorkCover authority shall be informed of any incidents which are deemed to be "notifiable" under the requirements of the WHS Act 2011 and the WHS Regulation 2011.

Printed Date: Printed By:

PORT KEMBLA COAL TERMINAL HSEC

Fire Management Plan



Management Plan MP.HS.459 Status: Pending Version: 14

Doc ID: 459
Page 5 of 24

9. REFERENCES

NSW EPA Environmental Protection Licence (EPL) 1625. New South Wales Environment Protection Authority.

NSW DOP (2009) Project Approval 08_009. New South Wales Government Department of Planning.

PKCT Sustainable Development Policy PO.003. Port Kembla Coal Terminal.

PKCT Quality Policy PO.004. Port Kembla Coal Terminal.

PKCT Emergency Management Plan MP.001. Port Kembla Coal Terminal.

PKCT Environmental Aspects and Impacts Register RG.001. Port Kembla Coal Terminal.

PKCT Environment Policy PO.002. Port Kembla Coal Terminal.

PKCT Pollution Incident Response Management Plan MP.013. Port Kembla Coal Terminal.