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1. INTRODUCTION

This Pollution Incident Response Management Plan has been developed to meet the requirements of the Protection of the Environment Legislation Amendment Act 2011 (POELA Act). On 29 February 2012 the POELA Act introduced changes to the Protection of the Environment and Operations Act 1997 (POEO Act) to improve the way that pollution incidents are reported, managed and communicated to the general community. The Port Kembla Coal Terminal (PKCT) holds Environmental Protection Licence (EPL) No. 1625 under the Protection of the Environment and Operations Act 1997 (POEO Act) and therefore must meet the requirements under the Act.

PKCT also needs to operate their site in accordance with Major Project Approval 08_0009, whereby Schedule 4 requires that the Department of Planning and Environment (DP&E) shall also be notified within 24 hours of any incident which has caused (or may cause) material harm to the environment.

This Plan provides a reference for the procedures and responsibilities for pollution incident response within the PKCT premises, as well as the day to day management measures for the prevention and mitigation of an incident.

COMPANY	Port Kembla Coal Terminal Limited
EPL NUMBER	1625
POSTAL ADDRESS	PO Box, 823, Wollongong East, NSW 2520
SCHEDULED ACTIVITIES	Coal Work
FACILITY NAME AND ADDRESS	Port Kembla Coal Terminal Limited Port Kembla Road Wollongong NSW 2520

Table 1: Facility Details

2. OVERVIEW OF OPERATIONS

PKCT operates as a coal terminal providing receipt, storage and ship loading services to a range of customers whom predominantly constitute mining companies in the NSW Southern and Western Coal Fields.

PKCT is located within a heavy industrial and port precinct on the northern side of the port of Port Kembla inner harbour and currently operates on land leased from NSW Ports. A head lease relating to over the water structures i.e. 102 is held with Roads and Maritime Services.

3. PLAN OBJECTIVES

The objectives of this Plan are to:

- Outline the responsibilities and contact details of responsible persons during an emergency event.
- Guide appropriate responses to a specific pollution incident.
- Outline the communications and notification protocol for emergency events.
- Provide a Plan for the locations of site entrances/egresses and locations of hazardous materials.
- Identify the risks of hazardous materials kept on site.
- Identify the management measures to control or minimise potential harm from hazardous materials.

- Identify neighbours to the site and provide their contact details.
- Outline the personnel training and auditing regimes for the emergency responses outlined within the plan.

4. DEFINITION OF A POLLUTION INCIDENT

The definition of a pollution incident is;

> *"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."*

Notifications of a pollution incident are required 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:

   a. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

   b. it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $50,000 (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.

Possible material pollution events that have been identified at PKCT premises include:

- Oil Spill in the Harbour
- Major Fire
- Road and Rail Transport Related Spill.
- Coal Storage and Dust Management
- Water Pollution Event

These potential material events and others have been assessed by PKCT and included within the Environmental Aspects and Impacts Register RG.001. Each hazard has been assessed for likelihood on a scale of 1 to 10 with 10 being very likely. Controls have been enacted to reduce the likelihood and consequence of these hazards. The 5 major hazards are discussed below.

5. DESCRIPTION AND LIKELIHOOD OF HAZARDS

This section outlines the main pollution hazards to human health or the environment associated with the activities being undertaken at the PKCT premises, including details of any circumstances or events that could, or would, increase that likelihood.

Plans showing PKCT likely pollution hazards and locations, as well as stormwater drains are presented as ***Figure 1*** and ***Figure 2***. A description of each of the main likely hazards follows.

Figure 1: Northern Site Plan, Location of Hazard Zones

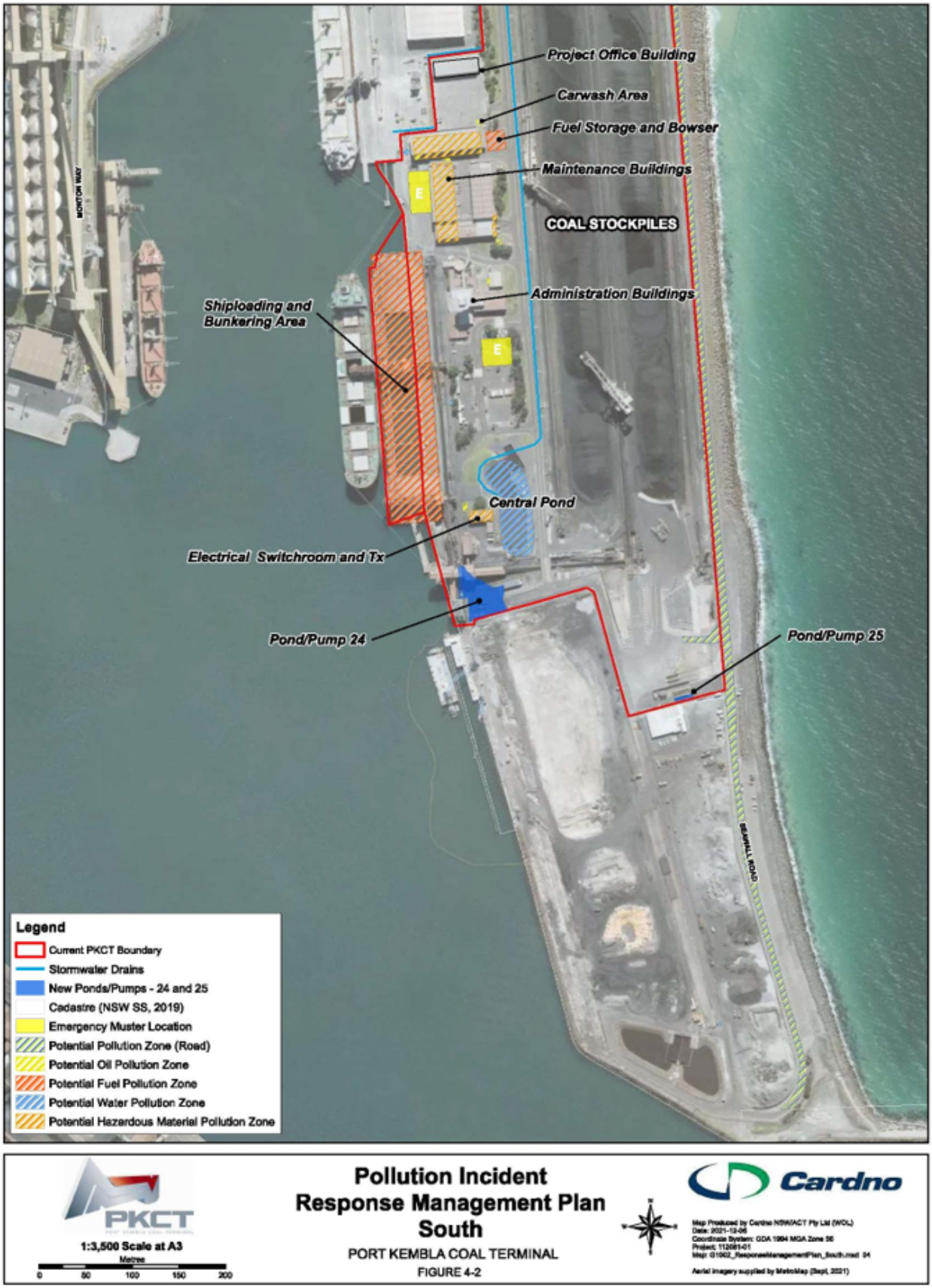

Figure 2: Southern Site Plan, Location of Hazard Zones

5.1 Oil Spill in the Harbour

Possible causes may be from the discharge of a ship, an oil/fuel mishap on or near the wharf, a ship bunkering pipeline mishap, an underground fuel tank rupture or fuel tank mishap when filling, or contaminated ballast discharge.

The likelihood of an Oil Spill in the Harbour occurring is 3 (Unlikely). This likelihood may be increased if controls are not followed, such as unlicensed tanker drivers using the dock or lack of maintenance. Administrative controls are in place to ensure minimisation of this occurrence. It is acknowledged that this type of incident would require reporting to all authorities.

An oil bunkering pipeline and mobile tankers are used to supply ships with fuel at Berth 102. This activity is managed by Park Fuels who are responsible for their operations. Park Fuels have an agreement with NSW Ports to operate the bunkering services and PKCT's EPL 1625 references this external responsibility for the pipeline and bunkering services provided by ParkFuels. PKCT has a duty to monitor, control access and respond if a bunkering related pollution incident was to occur on their site.

Should a fuel spill event occur then the main risks are injury to persons from ingestion or contact with spilled material. Offsite environmental impacts from fuel and hydrocarbon spills would depend on the scale of spill and the location of the incident and may result in contamination of waterways which could potentially be toxic to marine ecosystems.

5.2 Major Fire

The **PKCT Fire Management Plan MP.019** outlines the processes for managing its fire protection equipment and the required actions in case of a fire. The Management Plan aims to ensure that there is appropriate firefighting equipment onsite in suitable locations.

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

- Electrical equipment, wiring and cabling
- Operational 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 and fuel
- Refuelling operations using mobile tankers and fixed bowsers
- Mobile plant operations/vehicle movements
- Coal stockpiles/internal combustion
- Coal build up under belts

The likelihood of a Major Fire occurring is 1 "Unlikely". The likelihood may be increased by poor housekeeping, maintenance or a poor fire fighting system. Controls are in place to mitigate in case of fire.

Due to the nature of the site, with moving equipment and the extent of coal across the site, the whole site would be considered a fire risk location.

Should a significant fire event occur then the main risks are injury to persons from burns and/or smoke inhalation. Offsite impacts from smoke would be unlikely and would depend on the scale of fire event and prevailing weather conditions.

Refer to section "*General Emergency Response"* and section "Major Fire" within this document for additional details relating to a major fire emergency.

5.3 Road or Rail Transport Related Spill or Leak

Incidents involving vehicles transporting coal, hydrocarbons or other materials to site could occur on either the road or rail. **The likelihood of a significant Fuel Spill or Leak occurring is 3 (Unlikely)**. Potential locations on and near site are shown in ***Figure 1***, however this can occur anywhere between the off-site material pickup location and PKCT site.

PKCT has a duty to monitor, control access and respond if a road & rail transport related pollution incident was to occur on their site.

PKCT stores minimal fuel for onsite use. Fuel is stored in approved containers placed on bunding containment systems designed to contain leaks or spills. Underground tanks previously in use have been decommissioned. Diesel is brought to site as required by a third party and vehicles are filled via a mobile refueller.

Should a fuel spill event occur then the main risks are injury to persons from ingestion or contact with spilled material or a vehicle fire event. Offsite environmental impacts from fuel and hydrocarbon spills would depend on the scale of spill and the location of the incident. This may have the potential to result in contamination of waterways which can potentially be toxic to marine ecosystems.

It is anticipated that the emergency combat agency (i.e. fire brigade) will be called and they would take control of the situation during a significant event.

5.4 Coal Storage and Dust Management

Dust related incidents associated with stockpiling of coal could occur during the stacking and reclaiming process as well as due to weather events causing lift-off from in situ stockpiles.

The following activities have the potential to cause a dust event:

- Severe wind event
- Existing dust controls unable to cope with the event
- Operations preparation is inadequate for a wind event
- Equipment failure

The **PKCT Dust Management Plan MP.014** outlines the controls in place and mitigating actions to prevent dust events occurring and how to respond to an event if one was to occur.

The likelihood of a significant Dust Event creating air quality issues for PKCT Personnel and our community is 3 (unlikely).

5.5 Water Pollution Event

Water pollution events could occur as a result of operations at PKCT. The most likely scenarios for water pollution from PKCT are those associated with discharge of dirty water from a berth or pond. The likely causes of a dirty water discharge are failure of a dosing system, clay contaminated coal or discharge from a berth due to failure of a containment system or process.

The likelihood of a significant water pollution event creating water quality issues for PKCT Personnel and our community is 1 (unlikely).

5.6 Loss of Water Supply to Site

PKCT relies on a shared supply of potable "Process Water" and Recycled Water "Tertiary Treated Effluent (TTE)" for managing dust and fighting fires. Water is piped in from two separate Sydney Water Supply lines to an onsite 3ML storage tank where it is pumped around site for use in the stockyard sprays, truck wash and fire and wash down hoses. The lines supplying these water sources are shared between other Port users and at times may be interrupted due to reasons outside of PKCT's control. If either supply lines are disrupted, or supply from one or more lines is limited, PKCT may rapidly run short of water and put our licence to operate at risk. The likelihood of a loss of water leading to total depletion of our 3ML water storage tank is 0.3 (unlikely).

6. INVENTORY OF POLLUTANTS

PKCT maintains a register for hazardous materials and pollutants. The information requirements for the hazardous materials register are detailed in the Hazardous Materials Management Procedure PR.012. A copy of the Safety Data Sheets (SDS) for each hazardous material is maintained within a Hazardous Materials Register, ChemAlert.

Details of pollutant storage locations and methods for storage are provided in the **Hazardous Chemicals Procedure PR.012**. and are broadly illustrated within ***Figure 1*** and ***Figure 2.*** A list of the hazardous substances with large maximum storage quantities at PKCT are listed below.

HAZARDOUS SUBSTANCE	MAXIMUM STORAGE QUANTITY
Coal	850,000 tonnes
Coreshell 71303	4,000 litres
Ultrion 8187	5,000 litres
Inergen	8,350 litres
Mine Clean Plus	2,000 litres

Table 2: PKCT Hazardous Substances with Large Storage Quantities

7. PRE-EMPTIVE ACTIONS TO BE UNDERTAKEN AND MINIMISING RISK TO PERSONS ON PREMISES

PKCT have a number of pre-emptive actions that are undertaken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises. This includes a Risk Based facility design, the strategic provision of spill kits and fire protection equipment.

PKCT aims to minimise or prevent risk of harm to human health or the environment from hazardous material as outlined in the **Hazardous Chemicals Procedure PR.012**. The plan includes provisions for the safe storage of hazardous materials, a stringent review process for the design of these facilities and up to date plans and figures are available to site personnel where required.

The **Fire Management Plan MP.019** outlines the process for managing PKCT's fire protection equipment.

PKCT uses and Aspects and Impacts Register to identify and risk rank each environmental risk associated with the PKCT operation.

A Health, Safety, Environment and Community (HSEC) Management System has been established for all controlled activities and controlled sites. HSEC hazards and associated risks must be managed in accordance with **Risk Management Procedure PR.002**.

A current copy of the National Code of Practice compliant SDS for each hazardous material is to be maintained in ChemAlert.

A health surveillance system is in place to monitor the long and short term exposure to hazardous materials on-site and will be conducted in accordance with the Work Health Safety Regulation 2011.

Transportation of hazardous material that is also classed as dangerous goods will be undertaken in accordance with the requirements outlined in the **Hazardous Chemicals Procedure PR.012**.

PKCT also provide emergency response equipment and facilities, including spill kits, eyewash stations, safety showers, emergency alarms and pumps. This equipment is available at various locations across the site and in close proximity to high pollution risk areas. A summary of the various safety equipment on site and their location is provided below;

SAFETY EQUIPMENT	LOCATION AT PKCT
Spill Kits and Booms	Spill Kits are located on Berth 102, within and outside the Store, In and outside of the East and West Workshop, at Road Receival. Spares and booms can be found in the PPE room attached to the Main Store.
PPE	PPE supply is located in the Main Store
Stockyard Sprays	Stockyard sprays are used to control and manage dust events at PKCT. These are controlled electronically by the Control Tower Operators.
Fire Extinguishers	Fire Extinguishers and alarms are located within each building at PKCT. Spare extinguishers are located in the main Store. Inergen systems are installed in the Substations and yard machines and will deploy automatically in case of a fire. Fire Hoses are located on yard machines and buildings across site
Factory Talk Monitoring and Alarming System	All networked computers on site, 24/7monitoring within Control Tower
Continuous Dust Monitors	Located at the PKCT South Truckwash and Wollongong Sewerage Treatment Plant. Access to data via PKCT Factory Talk.
Water dosing systems	Systems located at the Settlement Lagoon, Central Pond (plumbers shed) and Northern Pond to assist with clarification of water on site.

Table 3: List of Major Safety Equipment and Locations at PKCT

8. WHEN TO REPORT AN INCIDENT

Licensees are required to report “material” pollution incidents immediately instead of “as soon as practical” (section 148 POEO Act). Licensees must notify each relevant authority about any incidents deemed to be “material”, not just the appropriate regulatory authority (ARA) under the POEO Act.

An incident will be deemed to be significant, requiring external notification and reporting if it results in or involves:

- **Material Harm** – harm to the environment is material if it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- **Actual or potential loss or property damage** of an amount, or amounts in aggregate, exceeding $50,000.

- **Hazardous Substances** – Any substance present in the workplace, which is on the List of Designated Hazardous Substances [NOHSC: 10005] or may be classified as such using the Approved Criteria for Classifying Hazardous Substances [NOHSC: 10008].

Important Note: Hazardous substances are harmful to health, and include substances that may cause chronic illnesses such as cancer, asthma, dermatitis and other diseases. Hazardous substances have health effects that are not always obvious – symptoms may develop only years after repeated and prolonged exposure.

9. EMERGENCY RESPONSE PROCEDURE AND REPORTING AN INCIDENT

This section provides information on the emergency response actions that must be undertaken immediately after a pollution incident to reduce or control any pollution.

A Trigger Action response Plan (TARP) has been developed for each likely "Material" pollution event. The TARP tables are to be utilised by Management and operational staff as a guide to assist in responding to an Environmental emergency and providing information to personnel about who needs to be contacted in the case of a "Material" Pollution Event. The TARP tables are located at the end of this PIRMP as **Appendix A**.

In the event that an Environmental Event occurs that does not have a specific TARP developed, or the event is not deemed material, then refer to following documents for guidance;

- Emergency Management Plan MP.001
- Incident Reporting and Investigation Procedure PR.011
- Emergency Response Procedure PR.001

If an environmental event occurs, PKCT personnel shall follow the process outlined in ***Figure 3*** below.

It is important to note that once an event has been assessed as "material", all relevant authorities must be notified immediately as outlined in ***Table 4***.

The Incident Reporting and Investigation Procedure PR.011 provides guidelines for incident management, ensuring reporting, notification, investigation, corrective preventive action, follow-up and closure at the PKCT site. This procedure covers incidents associated with activities at PKCT or where employees are undertaking offsite activities for PKCT.

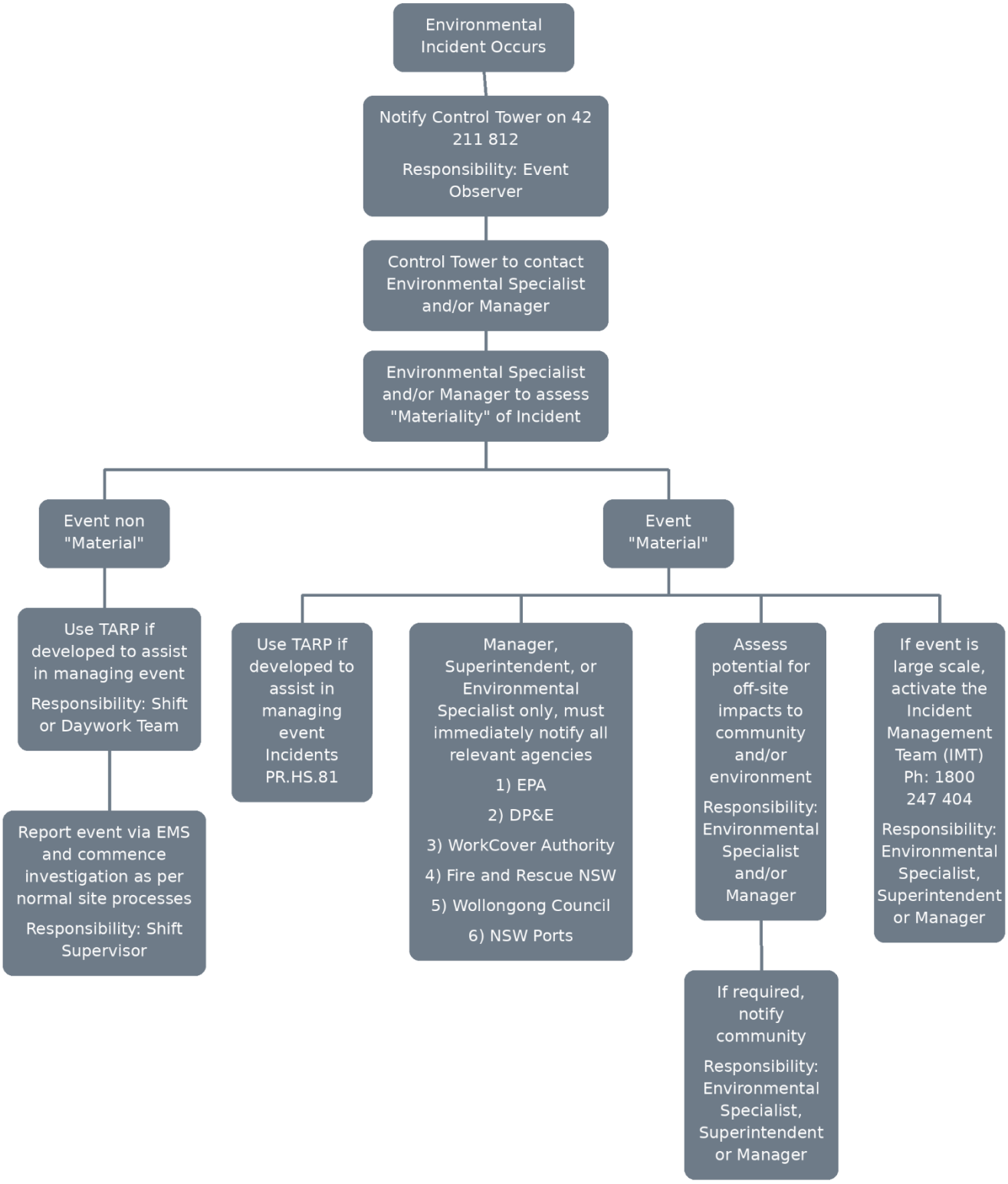

Figure 3: Environmental Event Response Process Flow

10. CONTACT DETAILS AND RESPONSIBILITIES

Once an event has been assessed as "material", all relevant authorities must be notified immediately as outlined in ***Table 4***.

In order to maintain consistency during the reporting process, external notification to the required agencies is to be made by a Manager, Superintendent or the PKCT Environmental Specialist only.

REGULATORY AUTHORITY	CONTACT DETAILS
Response Priority 1. If the incident is "Material" and presents an immediate threat to human health or property:	
Fire and Rescue NSW	000
Response Priority 2. If the incident is assessed as "Material" and does not require an initial combat agency, or once the 000 call and the emergency response has been activated, all relevant authorities must be notified by a manager, superintendent or Environmental Specialist as follows:	
EPA Pollution Incident Line	131 555
Department of Planning, Industry and Environment (Compliance, Wollongong Office)	02 4247 1852 or compliance@planning.nsw.gov.au (24 hours), and report via the Portal below; https://majorprojects.planningportal.nsw.gov.au/prweb/IAC/app/MP_/nFOlhaSdMtGYtjTH1uzqzw*/!STANDARD
Safework NSW	Ph: 13 10 50
Fire and Rescue NSW	000; 1300 729 579 **NB:** if the event warrants calling"000", there is no need to contact Fire and Rescue again
Wollongong City Council	Business hours: 02 4227 7111 After Hours Emergencies: 1300 557 980
Port Authority of NSW – (Harbour Master, Sharad Bhasin) - or Vessel Traffic Control	Harbour Master: 0409 811 810 After Hours Emergencies: VTC 42 750197
NSW Ports	Port Operations Manager – 0417 217 274

Table 4: Incident Response Procedure and 24 Hour Contact Details

The contact details of other organisations or agencies that may need to be contacted in response to particular incidents are provided in ***Table 5*** below

ORGANISATIONS / AGENCY	CONTACT DETAILS
Port Authority of NSW Vessel Traffic Control	02 4274 4571
Sydney Water Recycled Water Plant	132 090 (24 hours)
NSW Ports, Port Operations Manager	0417 217 274
Department of Planning Industry and Environment	02 6391 3100
Endeavour Energy	131 003
Department of Agriculture (old Australian Quarantine – Port Kembla)	02 80355391
AAT - Car Terminal Berths 103, 105, 106 and 107	02 4221 0940
Grain Corp- Berth 105	02 4224 6444
Quattro- Berth 103	42 272 911
Australian Industrial Energy (AIE)	0421 360 358
Sydney Water Recycled Water Plant	132090
Customs & Border Protection	02 42223900 or 1800 061 800 (24hrs)
Pacific National	02 4253 0726; 0404 048 650
Aurizon Co-ordinator	0458 468 418
RailCorp	02 4223 5616 or 131 500
Roads Maritime Services	132 701
Wollongong City Council	02 4227 7111
Endeavour Energy	131 003 (24 hours)
Linfox Supervisor	
Westcliff Weighbridge	02 4640 4109
NALCO	0407 174 268
NSW Poisons Information Centre	131 126 (24 Hours)
Wollongong Hospital	02 4222 5000

Table 5 – Other Contacts

PKCT's Incident Management Team Contact details are below in ***Table 6***.

ORGANISATIONS / AGENCY	CONTACT DETAILS
General Manager: David Richards	0400 798 776
Operations Manager: Darren Coleman	0403 579 255
Business Services Manager: Vanessa Harvey	0412 264 045
Planning and Logistics Superintendent: Mark Beale	0408 424 349
Asset Manager: Bruce Chapple	0409 115 739
Maintenance Superintendent: Kelly Quigley	0433 610 646
Environmental Specialist: Luke Pascot	0419 657 929
Superintendent Process, Reliability and HSEC: David Zancolich	0413 711 625

Table 6: PKCT Incident Management Team Contact Details

11. 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. PKCT employs a Community Engagement Plan which provides a framework and details the approach taken to engage the local community.

The PKCT Community Engagement Plan provides strategies which will provide the community with the information to understand what they may expect during a pollution incident or emergency, the sections below outline the mechanisms used to notify the community and neighbours of the PKCT site of a material pollution incident.

The following mechanisms will be used for providing early warning to the owners and occupiers of premises who may be affected by an incident occurring on the premises.

- Telephone calls to neighbouring sites and operations (as per contacts detailed in ***Table 7***)
- Incident notification and updates on the PKCT website (www.pkct.com.au)
- Email and telephone notification of CCC contacts (as detailed within the Community Engagement Plan);
- Media notification (as required).

The location and proximity of PKCT neighbours are provided below in ***Figure 4***.

NEIGHBOURING STAKEHOLDER	CONTACT NAME	CONTACT DTAILS
BlueScope Steel (Port Kembla)	Environment Officer on-call (Varies)	02 4275 7522 (24 Hours – Ask to be put through to Environment Officer on-call)
AAT Car Terminal (Berths 103, 105, 106 and 107)	Terminal Manager	02 4221 0940
Grain Corp (Berth 104)	Control Room (Varies)	02 4222 6408
Quattro (Berth 103- Grain)	Control Room; Operations Supervisor	4227 1296; 0497 075 821
Sydney Water Recycled Water Plant	Emergency Line	0418426916 (24 Hours)
Port Authority of NSW	Port Emergency Line	02 4275 0159
NSW Ports	Head of Operations	0467 764 476
Wollongong City Council	Duty Environment Officer	02 4227 7111 or 1300 557 980
PKCT Community Consultative Committee Members Contacts	CCC Members	Contact PKCT Environment Specialist

Table 7: Community Contact Details

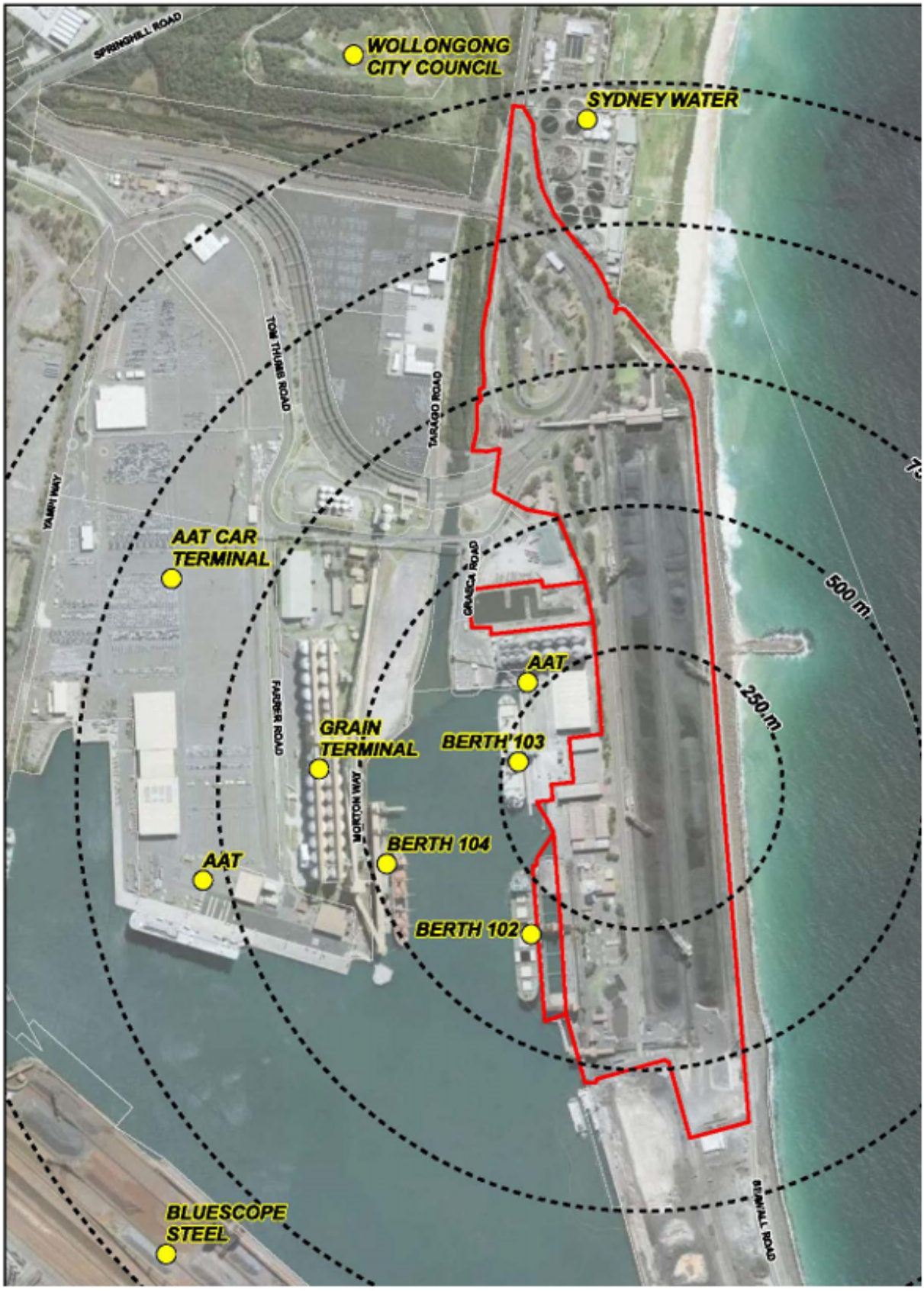

Figure 4: Proximity to Neighbours

12. STAFF TRAINING

Details of the staff training program for emergency response at PKCT are provided in the **Emergency Management Plan MP.001**. PKCT also have a number of incident specific emergency response plans such as the **Fire Management Plan MP.019** and **Hazardous Chemicals Procedure PR.012**. These plans provide staff training programs which outline the nature and objectives of the program as well as the frequency of the training to be undertaken and how records for any training are to be maintained.

Where appropriate, sub-contractors, visitors and external stakeholders may be trained in and understand the emergency response plans, their roles and responsibilities, and the use of emergency response resources.

Training records are maintained in Pegasus and electronic copies and training frequency information is stored in the following location;

I:\HSEC\Safety Training Day

13. PLAN ADMINISTATION

In accordance with Part 3A clause 98D(2) & 98D(3) of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, a publically available version of this Pollution Incident Response Management Plan (see **Appendix B**) will be made available on the PKCT website www.pkct.com.au.

If the plan is unavailable at the PKCT website and a person has made a written request the Public version of the Pollution Incident Response Management Plan (see **Appendix B**) will be provided without charge.

A copy of this entire plan will also be maintained at the PKCT premises at the Main Control Room and will be made readily available to those responsible for its implementation as well as any authorised officer upon request.

14. TESTING AND MANAGEMENT PLAN REVIEW

The Pollution Incident Response Management Plan and supporting plans and procedures will be tested routinely at least once every 12 months. Testing will ensure that the information included in the plan will be accurate and up to date and that the plan will be capable of being implemented in a workable and effective manner.

Plans will be tested within one month of a “material” pollution incident occurring in the course of an activity, to which a licence relates, that requires activation of PKCT’s Emergency Management Team. This follow up test will be to assess, in light of that specific incident, whether the information included in the plan is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

An annual review of the PIRMP document will be undertaken. Tracking of this review is managed through PKCT’s “TICKIT” legal compliance system.

15. REFERENCE DOCUMENTS AND RELATIONSHIP WITH OTHER EMEGENCY PLANS

According to section 153D Clause 98B(2) of the POELA Act, licensed premises that already have a plan (or equivalent plan), are not necessarily required to prepare a new or separate plan under the legislative changes. A plan may form part of another existing emergency or incident response plan as long as the information in the plans are in accordance with section 153C of the POEO Act and the POEO(G) Regulation.

PKCT have a number of existing Management Plans and documents that are relevant to this Pollution Incident Response Management Plan. It is recommended that these documents are consulted in conjunction with this Plan, particularly where they have been referenced as such.

The following documents are relevant to this Pollution Incident Management Plan:

REFERENCE	TITLE
https://legislation.nsw.gov.au	Protection of the Environment Operations Act 1997
https://www.epa.nsw.gov.au	Protection of the Environment Operations Legislation Amendment Act 2011
MP.001	Emergency Management Plan
PR.001	Emergency Response Procedure
PR.012	Hazardous Chemicals Procedure
PR.011	Incident Reporting and Investigation Procedure
PR.055	Stakeholder Management Procedure
MP.019	Fire Management Plan
PR.002	Risk Management Procedure
MP.014	Dust Management Plan
RG.001	Environmental Aspects and Impacts Register – currently a controlled register
MP.027	Community Engagement Plan

16. VERSION HISTORY

VERSION	CHANGES MADE	DATE
7	Whole document revision and rewrite to streamline. Earlier document has been archived.	02/01/2018
8	Annual review and check of document	28/12/2018
9	Annual review and check of document	11/12/2019
10	Updated volumes of Ultrion storage due to North Pond coagulant dosing system install	17/04/2020
11	Update to add NSW Ports Emergency Contact number and updated PKCT contacts list	17/07/2020
12	Annual review, updated document expiry date. No other material changes	07/10/2020
1.0	Removal of Berth 101 / Bulk Products references. Update to PKCT referenced document numbers. Update PKCT contact names / numbers Template and Format upgrade.	07/09/2021
2.0	Annual review undertaken. Updated figures to remove reference to Berth 101. Checked emergency contact details.	2/11/2021
2.0	Annual review, updated document expiry date. No other material changes	19/12/2022
2.0	Annual review, updated document expiry date and checked numbers. No other material changes	5/10/2023
2.0	Addition of Chemical “Mine Clean Plus” to Inventory of Pollutants section, page 8.	20/06/2024
2.0	Annual review, updated document expiry date and checked numbers. No other material changes	6/11/2024
3.0	Annual review, updated document expiry date and checked numbers. No other material changes	24/9/2025

4.0	Changes made to remove the “Ministry of Health” as a required authority when reporting a Pollution Incident. As per changes to the PoEOA 1997 on 23rd September 2025.	12/12/2025
5.0	Annual review. Change made to the threshold for “Material Harm” being increased from $10,000 to $50,000 as per new EPA regs. Added AIE contact details to plan.	26/10/2026

APPENDIX A – PKCT EMERGENCY EVACUATION PROCEDURE AND MAP

1. PKCT Emergency Services Rendezvous Point
2. Road Receival Emergency Rendezvous Point
3. Northern Tower Emergency Rendezvous Point
4. Berth 102 Emergency Rendezvous Point
5. TS8 Emergency Rendezvous Point

1. Emergency Assembly Point - Project Office
2. Emergency Assembly Point - Admin Car Park

APPENDIX B - TRIGGER ACTION RESPONSE PLANS - DUST

EVENT TYPE	TRIGGER	ACTION / RESPONSE	RESPONSIBLE
Minor Event **DER Level 1 and 2**	First Dust Alert email received by Tower	• Check site for visible dust, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle if required and direct water cart to problem areas. • Log actions and information in Tower logs.	Control Tower
	Short duration (<5mins) visible dust generation from a stockpile, Transfer station/conveyor etc.	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle if required and direct water cart to problem areas. • Ensure belt misting sprays are operational. Run cycle. • Log actions and information in Tower logs.	Observer and Control Tower
	Intermittent visible dust lift-off from vehicle operation (driving, excavating pushing up etc.) Equivalent to DER Level 1 and 2.	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle if required and direct water cart to problem areas. • Stop work if required to manage dust levels • Log actions and information in Tower logs.	Vehicle Operator, Observer and Control Tower
Moderate Event **DER Level 3 and 4**	Second and additional Dust Alert emails received by Tower	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle if required and direct water cart to problem areas. • Stop work to manage dust levels. Dust levels must be controlled prior to re-starting work. • EMS event to be entered. • Log actions and information in Tower logs.	Control Tower and Supervisor

	Moderate duration (>5mins) visible dust generation from a stockpile, transfer station/conveyor	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle if required and direct water cart to problem areas. • Ensure belt misting sprays are operational. Run cycle. • Stop work to manage dust levels. Dust levels must be controlled prior to re-starting work. • Log actions and information in Tower logs.	Observer and Control Tower
	Constant visible dust lift-off from vehicle operation (driving, excavating pushing up etc.) Equivalent to DER Level 3 and 4.	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle if required and direct water cart to problem areas. • Stop work to manage dust levels. Dust levels must be controlled prior to re-starting work. • EMS event to be entered. • Log actions and information in Tower logs.	Vehicle operator, Observer and Control Tower
Major Event **DER Level 5 and 6**	Dust Alerts system records an exceedance of dust criterion.	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle/s to wet area and direct water cart to problem area/s. • Stop work/operation to manage dust levels. Dust levels must be controlled prior to re-starting work. • Log actions and information in Tower logs. Include other visible dust sources/fog etc. in commentary. • EMS Event to be entered. Superintendent/Environmental Specialist to be contacted. • Environmental Specialist and Superintendent to assess whether EPA/DPIE reporting is required.	Control Tower, Environmental Specialist and Superintendent
	Visible dust lift-off from stockyard or other area that	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations.	Observer,

	leaves PKCT boundary or could be visible by person off site.	• Run spray cycle/s to wet area and direct water cart to problem area/s. • Ensure belt misting sprays are operational. Run cycle. • Stop work/operation to manage dust levels. Dust levels must be controlled prior to re-starting work. • Log actions and information in Tower logs. • EMS Event to be entered. Superintendent/Environmental Specialist to be contacted. • Environmental Specialist and Superintendent to assess whether EPA/DPE reporting is required.	Control Tower, Environmental Specialist and Superintendent
	Visible dust lift-off from vehicle operation (driving, excavating pushing up etc.) leaves PKCT boundary or could be visible by person off site. Equivalent to DER Level 5 and 6.	• Contact Control Tower, confirm spray guns are set to appropriate cycle and operational, check for gun isolations. • Run spray cycle/s to wet area and direct water cart to problem area/s. • Stop work/operation to manage dust levels. Dust levels must be controlled prior to re-starting work. • Log actions and information in Tower logs. • EMS Event to be entered. Superintendent/Environmental Specialist to be contacted. • Environmental Specialist and Superintendent to assess whether EPA/DPIE reporting is required.	Vehicle Operator, Observer, Control Tower, Environmental Specialist and Superintendent

APPENDIX C - TRIGGER ACTION RESPONSE PLANS - FIRE

EVENT TYPE	TRIGGER	ACTION / RESPONSE	RESPONSIBLE
Minor Event	Smoke/ heat detected/ potential/ minor smouldering material or fire e.g. • Small quantity of combustible material, localised, not likely to spread • Hot roller	Ensure personal safety and safety of others; • Contact team coordinator or supervisor. If safe to do so, fight the fire. Ensure you have an escape path and retreat if necessary. • Arrange for MCR and Manager/ Superintendent notification. • Arrange for EMS entry.	Event Observer, Team Supervisor, Main Control Tower
Moderate Event	Minor smouldering, moderate fire or fire with a risk that a major fire may develop e.g. • Coal on belt • Hot roller in contact with belt / coal under belt • Flammable/ combustible materials, electrical	Ensure personal safety and safety of others; • Contact Main Control Room and provide details of the event. MCR to consider activation of emergency response/ siren. • If safe to do so, contain/ fight the fire. Ensure you have an escape path and retreat if necessary. • Utilise stockpile sprays and water cart if needed • Take over management of emergency response through Field Response Team and support emergency service or expert external service providers as needed. • If called, meet and support Fire and Rescue NSW- assist in identifying site hazards e.g. stored energy- electrical, conveyor belts, uncontrolled movements if belts burn through ensure safe access to the location of fire, identify location of any combustible and flammable materials. • Arrange for MCR and Manager/Environmental Specialist/ Superintendent notification. • If needed, secure site, cease operations • Environmental Specialist/Superintendent/Manager to consider whether notification to relevant agencies should be undertaken/ Activation of PIRMP	Event Observer, Team Supervisor, Main Control Tower Manager/Environmental Specialist

Major Event	Potential or actual fire which can't be controlled e.g. • Coal on belt/ risk of fire in ship hatch • Coal under belt during ship loading • Flammable/ combustible materials, electrical • Coal in stockyard/ internal combustion.	• Ensure personal safety and safety of others; • Contact Main Control Room and provide details of the event. MCR to consider activation of emergency response/ siren. • If safe to do so, contain/ fight the fire. Ensure you have an escape path and retreat if necessary. • Utilise stockpile sprays and water cart if needed • Take over management of emergency response through Field Response Team and support emergency service or expert external service providers as needed. • Activate IMT if needed. • If called, meet and support Fire and Rescue NSW- assist in identifying site hazards e.g. stored energy- electrical, conveyor belts, uncontrolled movements if belts burn through ensure safe access to the location of fire, identify location of any combustible and flammable materials. • Arrange for MCR and Manager/Environmental Specialist/ Superintendent notification. • If needed, secure site, cease operations • Environmental Specialist/Superintendent/Manager to consider whether notification to relevant agencies should be undertaken/ Activation of PIRMP	Event Observer, Team Supervisor, Main Control Tower Superintendent/Environmental Specialist

APPENDIX D - TRIGGER ACTION RESPONSE PLANS – OIL SPILL

EVENT TYPE	TRIGGER	ACTION / RESPONSE	RESPONSIBLE
Minor Event	Minor spill, easily contained, small quantity, clean up straightforward, spill not a health hazard, severity not likely to escalate e.g. • leak from mobile plant or vehicle • truck hydraulic hose failure • leak from storage container	Ensure personal safety and safety of others; • Stop discharge if possible, contain the spill. • Contact team supervisor. Arrange clean up. Get support if needed. Ensure spill residues are disposed of in drums in front of wash-down bay • Arrange for EMS entry.	Event Observer, Team Supervisor,
Moderate Event	Moderate spill, material quantity, difficult containment, may or may not have health implications, severity may escalate. e.g. • Leak from storage container • Ship bunkering mishap • Oil escaping from ship	Ensure personal safety and safety of others; • Stop discharge if possible, contain the spill. Support emergency response as needed. • Contact Main Control Room and team supervisor and provide details of the event. • Contact NSW Ports Signal Station for assistance if a harbour spill. • Utilise booms and bunds in store and spill kits as necessary • Contact Environmental Specialist/Manager/Superintendent • Environmental Specialist/Manager/Superintendent to notify relevant agencies if deemed necessary	Event Observer, Team Supervisor, Main Control Tower Manager/Environmental Specialist
Major Event	Major spill on premises or escaping into harbour waters, emergency services or external e.g. • Ship bunkering failure • Oil escaping from ship	Ensure personal safety and safety of others; • Stop discharge if possible, contain the spill. Support emergency response as needed. • Contact Main Control Room and team supervisor and provide details of the event.	Event Observer, Team Supervisor, Main Control Tower Superintendent/Environmental Specialist

	• Transformer rupture or explosion	• Contact NSW Ports Signal Station for assistance if a harbour spill. • Utilise booms and bunds in store and spill kits as necessary • Contact Environmental Specialist/Manager/Superintendent • Environmental Specialist/Manager/Superintendent to notify relevant agencies if deemed necessary • Take over management of emergency response through Field Response Team and support emergency service or expert external service providers as needed. • Activate IMT if needed. • If called, meet and support Fire and Rescue NSW- • If needed, secure site, cease operations • Environmental Specialist/Superintendent/Manager to consider whether notification to relevant agencies should be undertaken/ Activation of PIRMP	

APPENDIX E - TRIGGER ACTION RESPONSE PLANS – WATER POLLUTION

EVENT TYPE	TRIGGER	ACTION / RESPONSE	RESPONSIBLE
Scenario 1 **Discharge from Berth**	Small volume of contaminated water discharges to harbour from PKCT facility operation eg. • leak from mobile plant or vehicle • truck hydraulic hose failure • leak from storage container • Discharge from Berth or machine • Settlement Lagoon discharge, short duration	• Contact MCR to initiate emergency response. • Contact Environmental Specialist or Risk Manager for assistance, may require IMT activation if significant. • Look for source of spill and isolate. • Use available PKCT spill response kits to mitigate and contain further spill entering harbour. • Contact Port Kembla Port Corporation Signal Station to provide assistance with booms etc. • Licenced waste providers such as Veolia may be able to assist with removal of contaminant • Environmental Specialist or Risk Manager to assess and contact EPA/DP&E if required	Event Observer, Team Supervisor, Main Control Tower Manager/Environmental Specialist
Scenario 2 **Discharge from Settlement Lagoon**	• Settlement Lagoon Water is visibly dirty at the western overflow point, poor quality water is discharging to harbour.	• Contact Environmental Specialist or Risk Manager for assistance. • Contact Team Coordinator. • If able, stop any pumps transferring to the Lagoon. Cease any washdowns etc. causing water ingress. • Check that dosing system is operational, contact Nalco if needed. • Depending on source of water, utilise coagulant dosing system or use dewatering pipeline in Lagoon to transfer water back to North Pond or recirculate water and re-dose at Lagoon inlet chamber. • Environmental Specialist or Risk Manager to assess and contact EPA/DP&E if required.	Event Observer, Team Supervisor, Main Control Tower Manager/Environmental Specialist

		• Licenced waste providers such as Veolia may be able to assist with removal of contaminant • • Initiate IMT if pollution event is significant and	
Scenario 3 **Dirty Water Plume in Harbour from Ship Deballasting**	• Deballasting ship creates a visible dirty plume in harbour • Ship activities cause contaminated water to enter harbour	• Contact MCR to initiate emergency response. • Contact Port Kembla Port Corporation Signal Station to provide assistance with booms etc. • Contact SBS and ask to speak to ship personnel to stop ship deballasting. • Environmental Specialist or Risk Manager to assess and contact EPA/DP&E if required	Event Observer, Team Supervisor, Main Control Tower Manager/Environmental Specialist

APPENDIX F - TRIGGER ACTION RESPONSE PLANS – LOSS OF WATER SUPPLY TO SITE

EVENT TYPE	TRIGGER	ACTION / RESPONSE	RESPONSIBLE
Minor Event	• 3ML Storage Tank reaches 47% full	• Warning alarms are generated within HMI • Confirm if there are supply issues with either Potable or TTE supply • Contact Sydney Water if supply issues are identified • Monitor water level in 3ML Tank	Shift Supervisor/Tower Operator
Moderate Event	• 3ML Storage Tank reaches 37% full	• Communications to site to ration water as much as possible (postpone wash downs, Cleaning of truckwash Lap Pools) • If weather conditions allow, turn off stockyard dust suppression sprays and operate manually as/if required • Contact Sydney Water Emergency Numbers (potable Supply 132090 or TTE 0418426916)	Shift Supervisor/Tower Operator Manager/Environmental Specialist
Major Event	• 3ML Storage Tank reaches 20% full	• Supervisor to notify PKCT General Manager that critical trigger has been reached and operations are to be stopped • Ration water left in tank in case of fire • Communications to be sent to site to cease operation (nil ship loading, nil deliveries, nil process water use) • Electricians to update code in HMI to allow pumps to draw down final 20% of water if required for fire fighting • Water Cart to be manned and filled in case of fire and to manage dust • Hire in trailer mounted water cart to aid in dust management/veneering • Available teams to focus on managing dust across site	Shift Supervisor/Tower Operator Manager/Environmental Specialist General Manager

APPENDIX G – PUBLIC POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN TO BE MADE AVAILABLE ON PKCT WEBSITE

PUBLIC POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

This Pollution Incident Response Management Plan for the Port Kembla Coal Terminal (PKCT) Environmental Protection Licence (EPL) 1625, has been developed and made publicly available in accordance with the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012* and the *Protection of the Environment Operations Act 2011* (POEO Act)

All public enquiries and reporting should be directed to PKCT's 24 hour community hotline on **1800 111 448**.

If an emergency or incident is determined to have caused or threatened "material" harm to the environment PKCT will immediately contact each relevant authority below. EPL holders are required to report "material" pollution incidents immediately instead of "as soon as practicable" (section 148 POEO Act). Licensees must notify all relevant authorities about any incidents deemed to be "material".

Emergency Pollution Response Procedure & Contact Details:

Priority 1 *- If the incident is "Material" and presents an immediate threat to human health or property:*

Fire and Rescue: 000

Priority 2 *- If the incident is assessed as "Material" and does not require an initial combat agency, or once the 000 call and emergency response has been satisfactorily activated, notify all relevant authorities as follows:*

(1) EPA Incident Line 131 555 (24 Hour)	**(2)** Department of Planning and Environment 02 6391 3100
(3) SafeWork NSW: 131 050	**(4)** Wollongong City Council: 02 4227 7111 or 1300 557 980
(5) Fire and Rescue NSW 000; 1300 729 579 **NB** if the event warrants calling"000", there is no need to contact Fire and Rescue again	**(6)** NSW Ports: Head of Operations – 0467 764 476 / BSMS Security (after hours) 4225 7935

A pollution incident is 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. An incident will be deemed to be significant, requiring external notification and reporting if it results in or involves:

- Material harm – harm to the environment is material if it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- Actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000.
- Hazardous substances – any substance present in the workplace, which is on the list of designated hazardous substances [NOHSC: 10005] or may be classified as such using the approved criteria for classifying hazardous substances [NOHSC: 10008].

All pollution incidents or potential near misses will be recorded and captured within PKCT's internal event management system. This process involves investigations by relevant managers to determine materiality and appropriate follow up responses.

Community Notification Requirements:

As the premises outlined in EPL 1625 has a number of neighbours (industrial operations and community), PKCT has developed and implemented an emergency response plan specific for the emergency and potential impacts on neighbouring properties and the broader community.
The implemented plan details how PKCT will allocate appropriate responsible people to notify and co-ordinate with affected community members.
The following mechanisms appropriate to the circumstances have been adopted to notify and update surrounding community in the event of a significant incident:

- Incident notification and updates on the PKCT website;
- Local media source notifications & media releases (where appropriate);
- Telephone calls to neighbouring sites or doorknocking of residents (where appropriate).

Actions taken by PKCT Emergency Management Teams (IMTs) to respond to and combat a pollution emergency will be guided by internal emergency response management plans and procedures specific to the incident or emergency context and these plans are tested and reviewed on a regular basis.

A map showing proximity to neighbours is presented in Figure 4.

APPENDIX H – NOTIFICATION CHECKLIST

ORGANISATION / ROLE	CONTACT NUMBER	RECORD OF CONTACT
PKCT General Manager	0419 977 752	Name of contacted person: _____ Event Number: _____
Fire and Rescue NSW	000	Name of contacted person: _____ Event Number: _____
EPA Pollution Incident Line	131 555	Name of contacted person: _____ Event Number: _____
Department of Planning and Environment Compliance@planning.nsw.gov.au (24h)	02 6391 3100	Name of contacted person: _____ Event Number: _____
SafeWork NSW	13 10 50	Name of contacted person: _____ Event Number: _____
NSW Ports	0417 217 274	Name of contacted person: _____ Event Number: _____