

Emergency Preparedness

Determination of Material Harm

Following containment of the incident, immediate action must be taken to determine if the incident can be classified as a 'material harm incident', i.e., considered to be causing or threatening material harm. As defined by the Act, a material harm incident has occurred if the incident:

- involves actual or potential harm to the health or safety of human beings or to ecosystems that are not trivial; or
- results in an actual or potential loss (including all 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) or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations).

The determination of a material harm incident will be made by the Capral Chief Warden / Safety Coordinator in consultation with the Plant Manager. If the Plant Manager is not available immediately, the Capral Chief Warden / Safety Coordinator will make the determination.

Internal and External Notification

Notification of an environmental incident is the responsibility of all site and contractor personnel. In the event of an incident, response and notification must be undertaken as per the Act, which contains the following important information:

- The persons and authorities to be notified and
- The contact details of each relevant authority refer to **table 1.2**.
- The agencies must be contacted in the order outlined below:
 - Fire and Rescue
 - EPA
 - Cumberland Council
 - SafeWork NSW

Pollution Incident Response Management Plan (PIRMP)

Roles & Responsibilities

In the event of any pollution incident, **all Capral staff** have a responsibility to raise the alarm and notify Capral Chief Warden / Safety Coordinator immediately. 'Immediately' is taken to mean 'promptly and without delay'. As per guidance provided by the EPA, the decision on whether to notify the incident in accordance with the Act should not delay immediate actions to provide the safety of people or contain a pollution incident. However, incident notification will be made as soon as it is safe.

Currently, personnel roles described within this plan are as follows:

- Chief Warden – whose role is the "Emergency Controller."
- Area Wardens support the chief warden on shift; and
- Area Managers – Team Leaders or Supervisors in any specific plant area.

Relevant contacts are listed in **Table 1-2** below.

Emergency Control Centre

The Emergency Control Centre will be based in the administration area, Smithfield office. The *Emergency Controller* will be based at this location in the event of an environmental emergency and shall coordinate requirements & resources from this location.

Emergency Stations and Assembly Areas

Designated Emergency Stations identified to all staff are to be used in the event of an emergency event, inclusive of any pollution incident.

The location of these, their associated evacuation assembly point and instructions on their use are indicated in the Emergency Plan – Capral Smithfield.

Evacuation Procedure

Where a potential evacuation situation arises, all personnel shall follow the evacuation procedures as outlined in the Emergency Plan – Capral Smithfield.

Emergency Information

The emergency Controller ensures that relevant site documents (for example, centralised MSDS information) are available at a central location – evacuation point or administration area and accessible to the Emergency Plan – Capral Smithfield.

Actions to be taken during or immediately after a pollution incident

The PIRMP procedure, in line with Capral's existing Emergency Procedure, would be followed in the event of a pollution incident occurring at the site. Please refer to Appendix O

In the process of notifying the relevant authorities, the following information must be communicated to each authority in accordance with the POEO Regulation 2012 (C 148) during pollution incidents causing or threatening material harm:

- The time, date, nature, duration, and location of the incident,
- The location of the place where pollution is occurring or is likely to occur,
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- The circumstances in which the incident occurred (including the cause of the incident, if known),
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
- Other information prescribed by the regulations

The information required to be reported only that information known to the person notifying the incident when the notification is given. If any of the above information is not known during the initial announcement but becomes known afterwards, that information must also be notified to the relevant authorities.

After initial notification of any material harm incident, it will be the Chief Warden / Safety Coordinator's responsibility to liaise with any authority listed in **Table 1-2** that requests additional information or provides directions for managing the material harm incident. This may include incident investigation reports and ongoing environmental monitoring results.

Table 1-1 summarises the 24-hour contact details for parties responsible for managing incident response and notifying the relevant authorities.

Table 1- 1 CEM emergency contact

Site Location Details	
Site	Capral
Address	Building 4/26 Long St, Smithfield NSW 2164
Location Description	On Long Street between Briton Street and Tait Street
<i>The administration office personnel are responsible for notifying the Chief Warden / Safety Coordinator and Area Wardens/ Plant Manager if these individuals are off-site at the time of the incident.</i> <i>For Capral internal use, 24-hour contact details as per the current staff directory.</i>	

Table 1-2 Agencies to Notify

Emergency Services – 000			Required in the event of
Fire Brigade	000	000	Fire
Fire and Rescue NSW	000	000	Hazardous Materials Response
Ambulance	000	000	Injury
Police	000	000	As required
Relevant Authorities			
Environment Protection Authority (EPA)	Environment Line 131 555		Pollution incidents causing or threatening material harm
Council – Cumberland	02 8757 9000		Notifiable incident
NSW Health	1300 066 055	1300 066 055	Notifiable incident – ask for Public Health Officer on call
SafeWork NSW	13 10 50 24 hours	13 10 50 24 hours	Notifiable incident

Table 1-3 Other useful contacts

Sydney Water – Service Problems – 24 hr	132 090
Energy Australia – 24hr	131 388
AGL Gas	131 909
Telstra	131 191
Liquid Waste Contractor	Suez: 13 13 35

Notification to Local Landholders and Community

Community notification shall be undertaken at the determination of the Chief Warden / Safety Coordinator.

The following notification methodology is proposed to be utilised as required:

- early warnings: same-day telephone notification or door knocking to landholders who may be affected by the incident over the subsequent 24-hour period; and
- updates: follow up phone calls to all landholders who may have been notified by the

initial early warning.

Information provided to the community will be relevant to the incident and may include the following details:

- Type of incident that has occurred.
- Potential impacts on local landholders and the community.
- site contact details; and
- advice or recommendations based on the incident type and scale.

Inventory Of Pollutants On Site

In addition to the chemicals on site included within the Capral's Dangerous Goods Licence, several other potential substances on site may become pollutants in the event of unforeseen or emergency circumstances such as a spill, loss of containment, plant malfunction, overflow event etc.

Table 2-1 Potential Pollutants on site

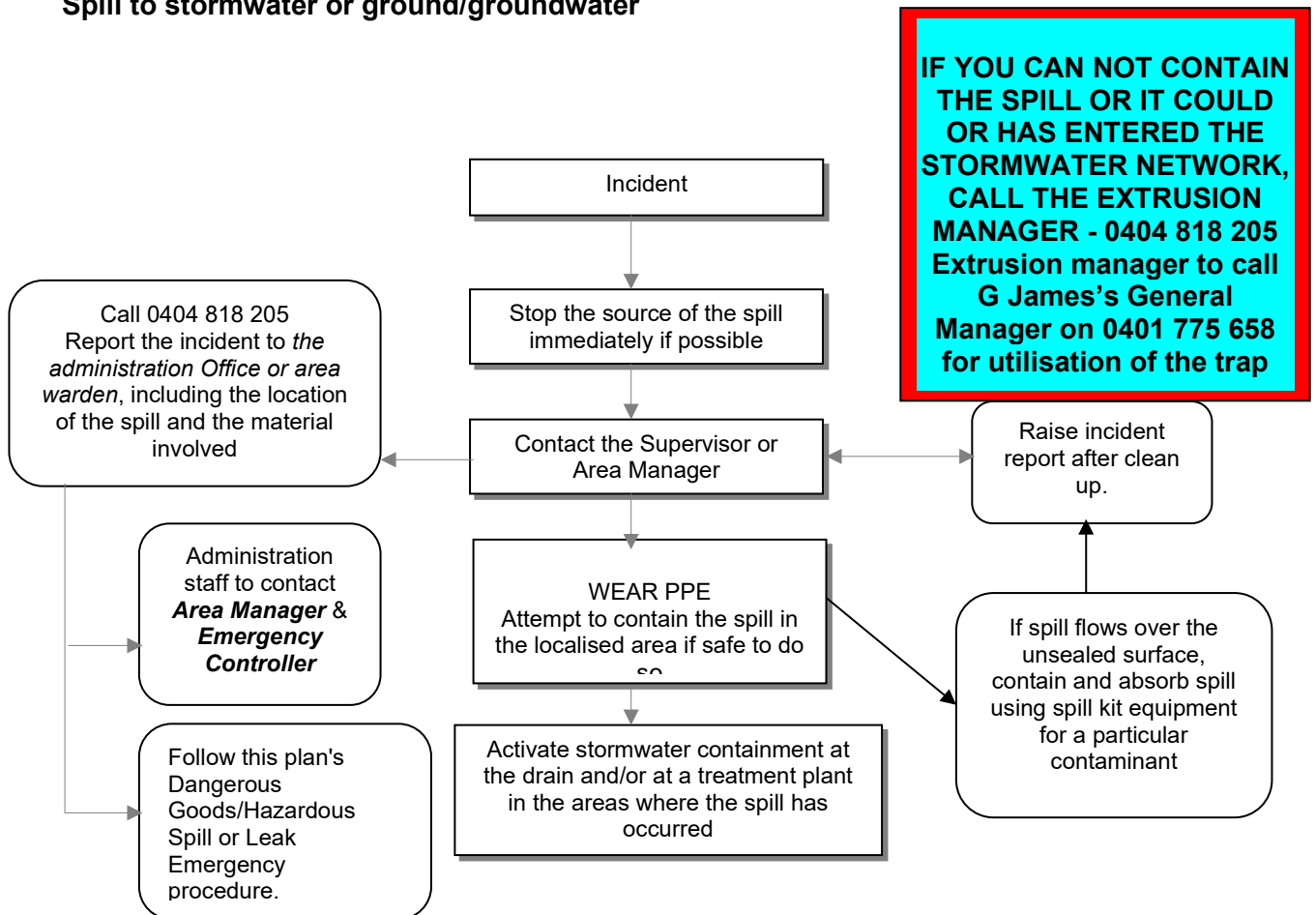
Potential pollutant	Location	Estimated Maximum Quantity
Stored Diesel fuel	Various storage locations within areas of operation	Estimated quantity of 120L across site at any time
Stored production wastes including; - Mixed used oily waters	Various storage locations within areas of operation	Variable quantity on site at different times. Approximately 2000L generated and disposed of per year
Stored Powder Caustic	Stored in a storage shed	Variable quantity on site at different times. Approximately 43200kg utilised per year.
Stored Caustic Waste	In tank in the bunding area at rear of site and in the caustic shop in the pit	Variable quantity on site at different times. Approximately 96000L generated and disposed of per year
Storm water - In the event of a failure of the underground tank	Stormwater from across the site (or potentially beyond) could transport contaminants directly into the environment and watercourses.	Volume of water would be determined by rainfall and therefore surface water flow. Quantity and composition of pollutants would depend upon the areas across which surface water flow would flow.
- In the event that oily water separators malfunction/overflow	Contaminated process water could potentially be released to the environment via the irrigation system	volume would be determined by volume of rainfall and water level within the bunding at the time.

Environmental Incident Procedure – Fire

For response to a fire which may cause an environmental incident, refer to existing Emergency Management Plan Capral Smithfield and the Dangerous Goods/Hazardous Spill or Leak Emergency procedure.

Environmental Incident Procedure – Liquid Pollutant

Spill to stormwater or ground/groundwater



Environmental Incident Procedure - Flooding

In the event of flooding from any pipe containing water, an environmental risk exists in managing floodwaters. The immediate action to be taken is:

STEP	ACTION
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- | | |
|----|--|
| 1. | Do not endanger personal safety. Switch off machines, if possible, to prevent water damage. |
| 2. | Evacuate all personnel from the impacted area. |
| 3. | Close valves on the piping system, shut off any pumps etc. |
| 4. | Switch off the power mains to the affected area. |
| 5. | Follow the Dangerous Goods/Hazardous Spill or Leak Emergency procedure within this plan if the water comes in contact with contaminants. |
| 6. | Catch or divert water with plastic, salvage sheets, boards, and rubbish bins. |
| 7. | Return to normal conditions as soon as possible. |

Environmental Incident Procedure - Dangerous Goods/Hazardous Spill or Leak Emergency

Person detecting dangerous goods/hazardous spills or leaks will:

- Alert persons nearby and request assistance.
- Ensure anyone's immediate safety within the vicinity of the leak/spill (only if safe to do so).
- After reviewing the SDS, use the spill control equipment (if safe to do so) to control the spill.
- Notify the Deputy Warden.
- Evacuate to your Emergency Assembly Area (if notified to do so).
- Remain at the Emergency Assembly Area until released by the Area Warden.

Chief/Area Warden shall:

- Determine the nature of the hazardous spill or leak and initiate actions to safeguard persons and property
- Ensure the Fire Brigade has been notified
- Prevent entry to the affected area and initiate an evacuation.
- Evacuate to an Emergency Assembly Area at least 200 metres upwind from the spill/leak (so that any toxic fumes are blowing in the opposite direction).
- Shut down all gas and electricity supplies, including air conditioning (only if safe to do so)
- Locate and notify the Chief Warden. The Extrusion Manager must be notified, and if the spill/leak has entered the stormwater system, the Extrusion Manager should utilise the manually operated stop valve.

Emergency Personnel (Wardens) at the site will:

- Ensure the safety of persons within their area.
- Ensure all persons within their area are notified of any direction to evacuate and follow evacuation procedures.
- Report to the Chief Warden and await further instructions.

Spill Kits Usage

Spill kits are to be used in case of emergency spills/leaks. Spill kits are located throughout the site to prevent hazardous chemicals from entering stormwater drains and contain absorbent materials used to clean up spills (all non-aggressive liquids such as oils, coolants, solvents, antifreeze, and water) and are located throughout the facility. Familiarise yourself with your local kit

Instructions:

Assess - Look for dangers to your safety and to the environment. Isolate the spill by using spill kit equipment. Stop the source of the spill.

Report - Report the spill to your supervisor. Following the containment of the spill, complete an incident report detailing all the facts of the incident.

PPE - Do not come into contact with the spill without the correct PPE (gloves, goggles, etc.). If unsure, check the Safety Data Sheet (SDS) for the liquid spilt.

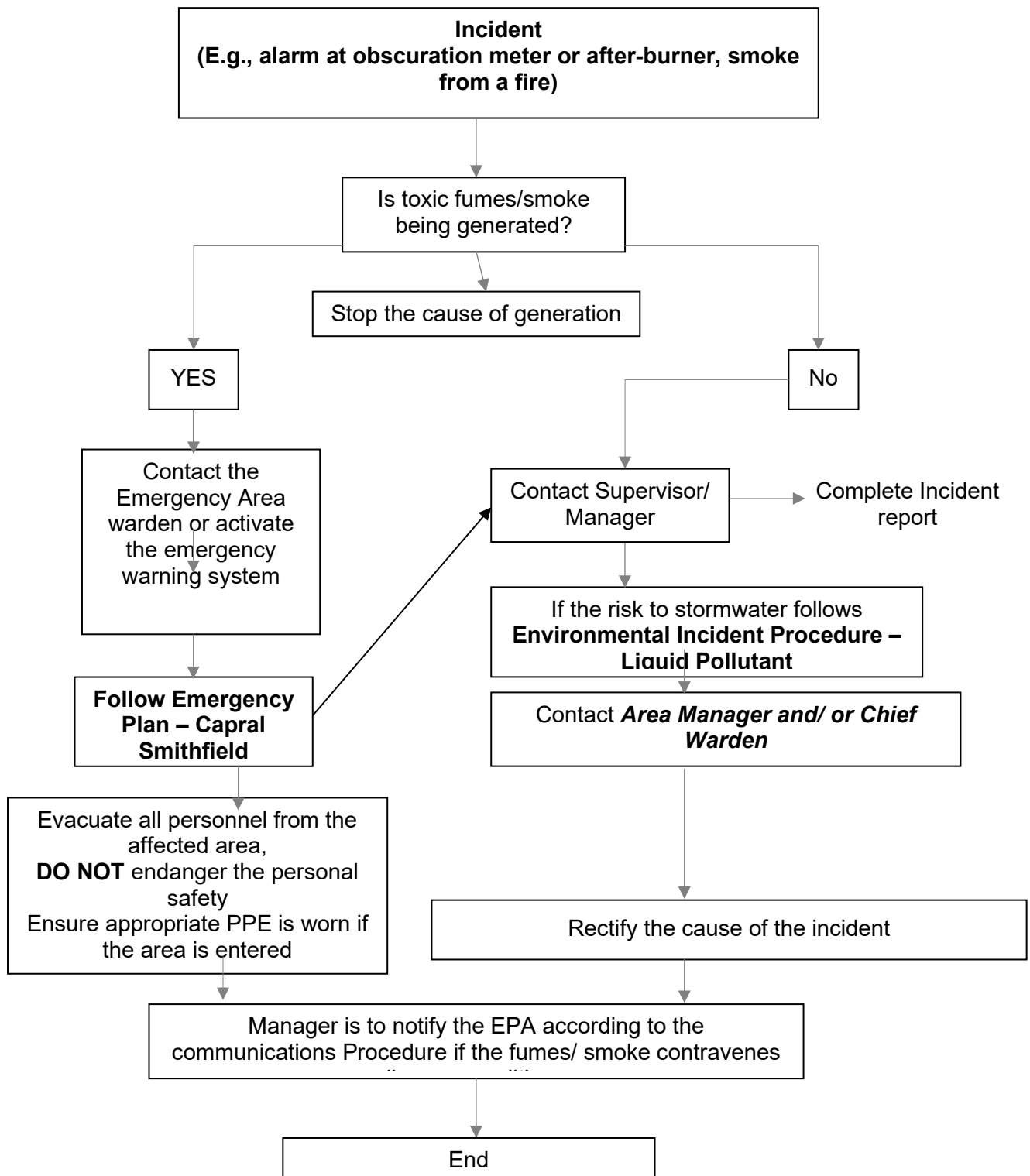
Disposal - Used spill kit material should be placed in a disposal bag and disposed of as prescribed waste. It should not be placed in landfill bins.

Restock - Used spill kits should be taken to maintenance. A full kit available in maintenance is then to be placed in the location to replace the used kit. Maintenance will then organise to have the spill kit restocked.

How to use a spill kit:

- Distribute loose spill control materials over the entire spill area, working from the outside and circling to the centre. This reduces the chance of splashing or spreading of the spilled chemical.
- Use a brush and scoop (spark-resistant if flammable materials are involved) to place materials in an appropriate container.
- Polyethylene bags may be used for small spills. Five-gallon pails or 20-gallon drums with polyethylene liners may be appropriate for larger spills.
- Complete a hazardous waste tag, identifying the material as Spill Debris involving [name of substance] chemical, and affix the sticker to the container or bag.
- Remember, using an absorbent does not alter the chemical properties of the chemical.
- Consult the SDS for advice on storage and packaging for disposal.
- Place the container in a properly ventilated area until the next chemical waste pick-up.
- Decontaminate surfaces involved in the spill using mild detergent and water.
- Report all spills to your supervisor or the principal investigator.
- Replenish spill control materials.
- In all cases, report to your supervisor and/ or the Safety Coordinator.
- If a spill occurs, that threatens or harms the environment, your manager must inform the EPA or the local council as soon as you become aware of it.

Environmental Incident Procedure – Air Pollutant



Training, Testing and Communication

Training

All personnel affected by this document's content will receive instruction or explanation on the relevant parts of the document. This training will be communicated at staff meetings and toolbox meetings.

Incident management and emergency response shall be included in all emergency procedure training and site inductions. A training exercise designed to test the adequacy of emergency preparedness and response will be undertaken at least once each year, incorporated with the existing Emergency Response Training scheduled for the site.

Training exercises may involve the emergency response team responding to a simulated emergency but may also include expanded simulations that involve other (or all) site personnel, the Emergency Management Team, Incident Management Team and external response agencies (Ambulance, Fire etc.). All training records, including the name of the person undertaking training and the training date, shall be maintained in personal training record files and updated in the training matrix.

Incident and Complaint Notification system

Incidents and complaints can be made via the Capral internet, at the site or by employees using the whistle-blower system. Capral has a publicly available website with a complaints department. Complaints would be investigated by site management with follow-up by Group Safety. All complaints will result in an investigation, notification to relevant government bodies and review.

Testing, Review and Maintenance

The testing of the PIRMP will be undertaken to check that the information is accurate and current and that the plan can be implemented in a workable and effective manner. Testing shall be undertaken in the following ways:

- The PIRMP will be tested by assessing and reviewing it and making any necessary changes as identified. Testing is taken to be either a desktop review or an environmental emergency drill procedure. Testing will include all components of the plan, including training requirements.
- A review of the PIRMP will occur as required when changes are made that would impact the PIRMP commencing from the date of authorisation by the Operations Manager. Contact details in this document must always be kept current
- the PIRMP will be reviewed within one month from the date of any pollution incident that occurs during an activity to which the EPL relates. This review will be undertaken in light of the incident to ensure the information included in the plan is accurate and up to date and the plan can still be implemented in a workable and effective manner.

Information to be retained regarding PIRMP testing includes:

- How the test was undertaken.
- Dates when the plan has been tested.
- The person who carried out the testing; and
- The date and description of any update of or amendment to the plan.

This information will be included in this report.

Availability of the PIRMP

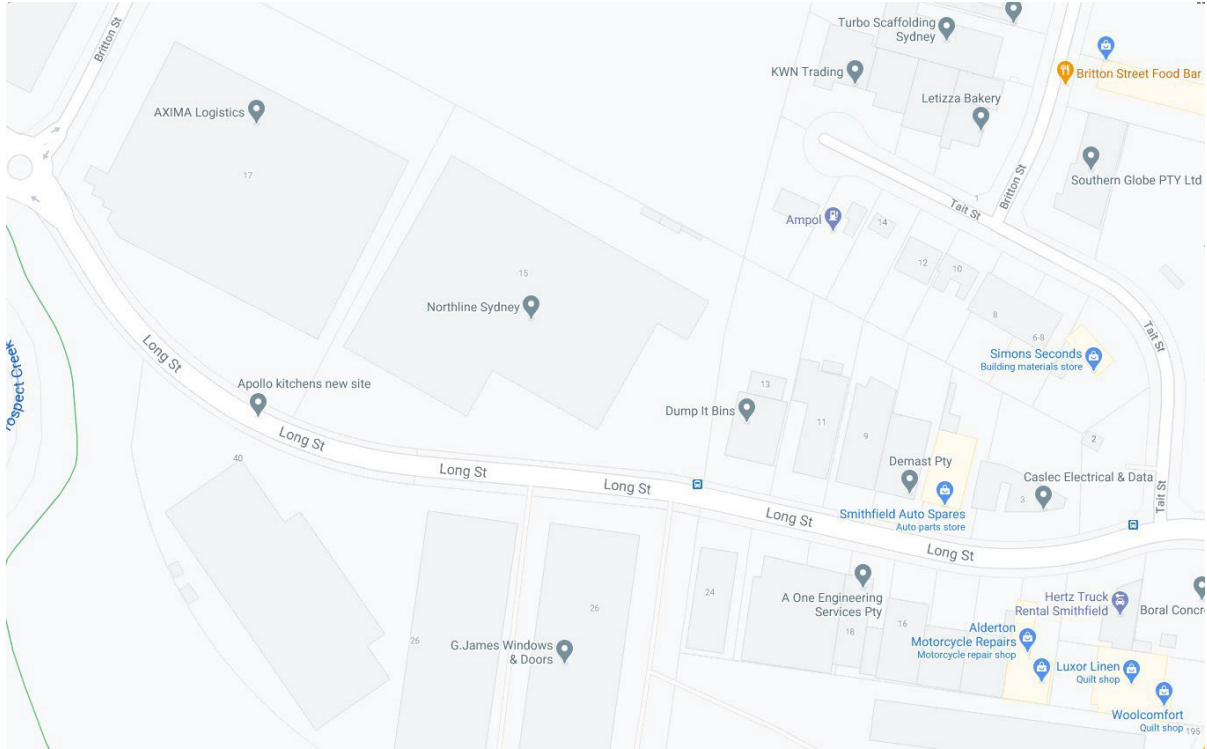
The PIRMP shall be kept in written form at the premises and made available to all personnel responsible for implementing the plan and to an authorised officer (as defined in the Act) on request.

The PIRMP will be made publicly available via the Capral Website www.capral.com.au

No personal information (within the meaning of the *Privacy and Personal Information Protection Act 1998*) or security-sensitive site information will be made publicly available as part of the PIRMP.

Appendix

Appendix A: Site Locality Map



Appendix B:Satellite Image of Site



Appendix F: Hazardous Goods Stored in Packages

Potential pollutant	Location	Estimated Maximum Quantity
Stored Diesel fuel	Various storage locations within areas of operation	Estimated quantity of 120L across site at any time
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- In the event that oily water separators malfunction/overflow	Contaminated process water could potentially be released to the environment via the irrigation system	volume would be determined by volume of rainfall and water level within the bunding at the time.

Appendix G: Fire Hazards

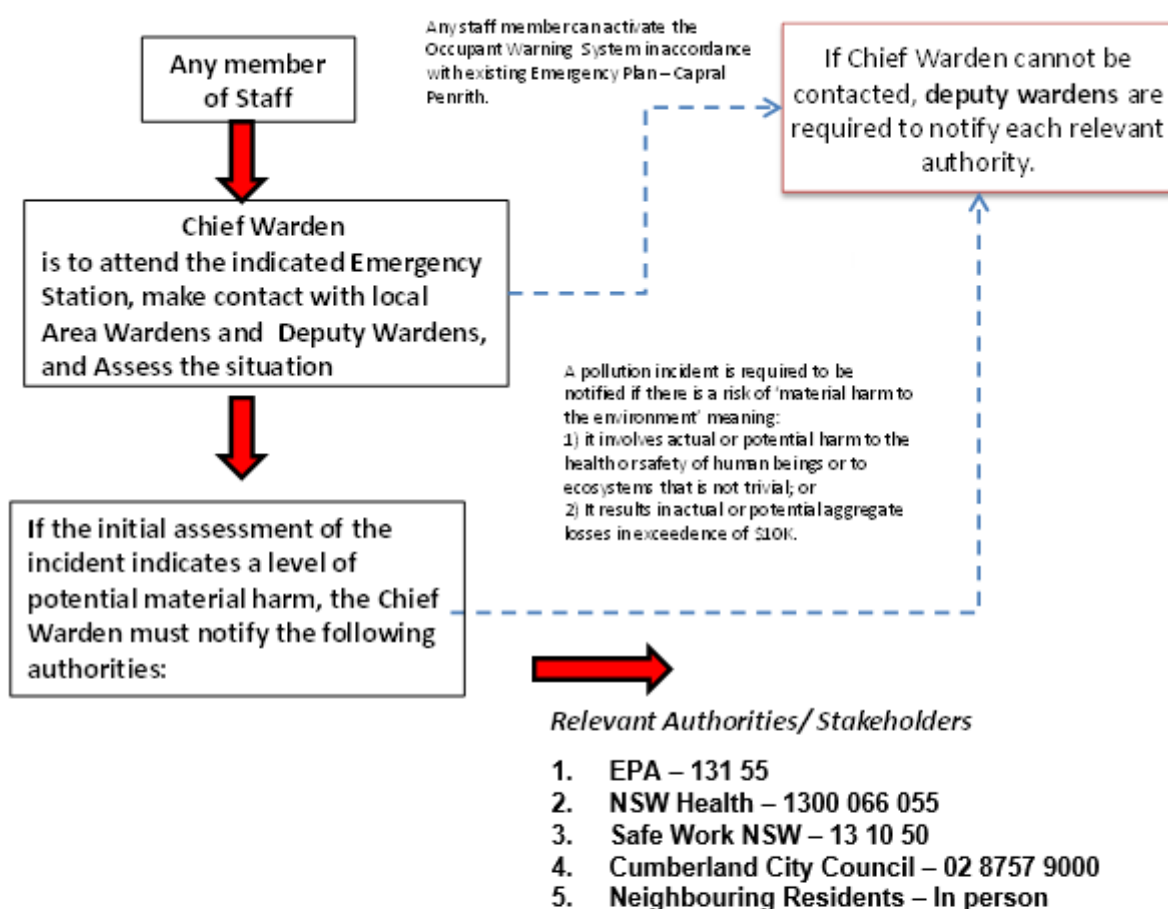
Description of Hazard	Type of Hazard (e.g., fire, explosion, toxic, water pollutant)	Details of Hazard (e.g., degree of flammability, toxic exposure limits, environmental concerns)
Large amounts of cardboard	Fire	Minimal range – not likely to spread
Kitchen	Fire	Minimal range – not likely to spread
Chemicals	Fire, toxic effects, water pollutants, health risk	Please refer to ChemAlert for all details and data sheets.
Caustic	Fire, toxic effects, water pollutants, health risk	Please refer to ChemAlert for all details and data sheets.
LPG Gas	Fire, toxic effects, water pollutants, health risk	Please refer to ChemAlert for all details and data sheets.

Appendix H: Fire Mitigation

EMERGENCY RESOURCES			
Type	Description	Quantity Available	Location
Firefighting	Alarm Panel		Multiple all over the site
	EWIS panel		Multiple all over the site
	Exit Doors		Multiple all over the site
	Fire Blankets		Multiple all over the site
	Fire Extinguishers		Multiple all over the site
	Fire Hose Reels		Multiple all over the site
	Fire Hydrants		Multiple all over the site
Protective Clothing	Safety glasses/shoes/gloves	Varies	With employees
First-aid	First aid box First Aid Room Emergency eye wash Defibrillator Emergency Shower in Caustic Room	Various	
Communication	Mobile phone Landline phone		With employees and fixed.
Environmental Controls	Drain socks Bunding Spill kits	Contract	Bunding – Die Maintenance area. Drain socks and spill kits - across the site

Appendix O: Pollution Incident Notification Procedure

POLLUTION INCIDENT NOTIFICATION PROCEDURE



Record Incident in Incident Database

(person becoming aware of incident or team leader – additional information to be added as it becomes available)

Who was notified (organisation)

Who they notified (name and position)

How they were notified (phone/email); and

Time they were notified