POLLUTION INCIDENT RESPONSE MANGEMENT PLAN

Gypsum Resources Australia - Glebe Island Bulk Shipping Terminal (Berth 7)
Sommerville Road, Glebe Island NSW 2034, Australia

Prepared for:
GRA Gypsum Resources Australia Pty Ltd
May 2023

ENVIRONMENTAL COMPLIANCE SERVICES

GRA Gypsum Resources Australia Pty Ltd

Pollution Incident Response Management Plan

Document Control: Revision History, Tests and Training

Version	Date	Revision Details	Revised by	Approved by
Version 11	25/05/23 (V11)	Version 11 (2023) - Supersedes all previous GRA versions with new format and additional details to reflect: • PIRMP Test (completed 22/05/23) • PIRMP Training conducted (completed 22/05/23) • Annual Review of PIRMP (completed 24/05/23)	Attila Balazs (ECS Director)	Tim Lange Logistics Manager Gypsum Resources Australia

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This Pollution Incident Response Management Plan (PIRMP) has been prepared for Gypsum Resources Australia (GRA) operating a Port Terminal in Sydney Harbour for receiving and storage of gypsum in accordance with the conditions of an Environment Protection Licence (EPL No. 11906) issued under the *Protection of the Environment Operations Act 1997* (POEO Act).

All holders of an EPL are required to prepare and implement a PIRMP which includes procedures for the:

- Identification, risk assessment and appropriate controls in minimising the potential for a pollution incident associated with the Site operations and materials;
- Efficient and effective response to pollution incidents;
- Comprehensive and timely communication about a pollution incident to:
  - employees, contactors and visitors;
  - the **EPA** and other relevant Authorities such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
  - neighbours and communities who may be impacted by the pollution incident; and
- Testing and review of the PIRMP for its accuracy, currency and effectiveness in responding and communication of a pollution incident.

The following flowchart provides a summary on the activation procedure of the GRA Glebe Island Terminal PIRMP.

PIRMP Activation Procedure

All Employees and Contractors

Any **Pollution Incident** such as spills / leaks / fire / excessive air emissions **Must** be **Immediately Reported** to the Site Manager with details of severity and response

(See Sect 1.1 for Definitions of "Pollution Incident" and "Immediate Reporting")

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Site Manger

Does the incident have potential for **Material Harm?**

(See Sect 1.1 for Definition of Material Harm)

NO ⇨

Site Manger

No requirement for "**Immediate Reporting"**. However, decision should be subject to updates on incident response status

YES – Incident Response ⇩

Site Manger & PIRMP Response Team

- Ensure appropriate response is being conducted to safely minimise impacts **(See Sect 4.1 & 4.2)**
- Ensure all employees / contractors / visitors are safe and restricted from incident area **(See Sect 3.1)**
- Notify Authorities of the incident nature, substances involved, risks and response **(See Sect 5.1 & 5.2)**
- Notify neighbours/community of incident and any precautions they may need to take **(See Sect 5.3)**
- Coordinate with Authorities or external incident response - if in attendance **(See Sect 4.1 & 4.2)**
- Provide appropriate updates to Authorities and neighbours/community **(See Sect 4.2 - Table 4)**

Once Incident response has been completed

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Site Manger & PIRMP Response Team

- Notify Authorities and neighbours/community incident response has been completed
- Inform Authorities and neighbours/community of any ongoing precautions required
- Clean-up response materials and dispose through licensed waste service provider
- Engage environmental consultants to investigate and remediate contamination (if required)
- Consider Duty to Report obligations on any residual contamination to EPA under S60 of CLM Act
- Conduct incident investigation and revise PIRMP with any learnings - **within 30-days of incident**
- If any amendments required to PIRMP - **post revised version on website**
- Provide incident investigation summary to Authorities, neighbours and community

(See Sect 4.2 - Table 4)

1 INTRODUCTION

This Pollution Incident Response Management Plan (**PIRMP**) has been prepared for the GRA Glebe Island Port Terminal (**the Site**) which operates under the regulatory requirement of an Environment Protection Licence (**EPL No. 11906**) administered by the NSW Environment Protection Authority (**EPA**).

All holders of an EPL are required to prepare and implement a PIRMP which provides details on the manner in which the Site will comply with the requirements of Part 5.7A of the *Protection of the Environment Operations Act 1997* (**POEO Act**) and relevant clauses of the *POEO General Regulation* (**POEO Gen Reg**), which includes procedures for the:

- Identification, risk assessment and appropriate controls in minimising the potential for a pollution incident associated with Site operations and materials;
- Efficient and effective response to pollution incidents;
- Comprehensive and timely communication about a pollution incident to:
  - employees, contactors and visitors;
  - the **EPA** and other relevant Authorities such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
  - neighbours and communities who may potentially be impacted by the pollution incident; and
- Testing and review of the PIRMP for accuracy, currency and effectiveness in responding and communication of a pollution incident.

1.1 KEY PIRMP DEFINITIONS

The following definitions provide an understanding of three key terms that the EPA generally reference in relation to when a PIRMP is to be activated:

Pollution Incident means 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 at a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Material Harm to the environment is when:

- It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, **or**

- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and 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.

Immediately Reporting simply means promptly and without delay. The amount of time that this actually takes is likely to change depending on the circumstances of the incident.

1.2 Site Description and Operations

The Site is used for receiving and storage of shipments of bulk gypsum. The gypsum is unloaded into wharf-based receiving hoppers and conveyed to a 30,000 tonne storage facility prior to being transferred to road-going trucks for delivery to GRA customers as they require.

Shipping deliveries vary depending upon customer demand but are expected to be on average 1 to 3 ships per month at current demand levels. Berth occupancy by discharging ships will vary depending on the vessel and load size (50 to 100 hours per shipment typically).

The Site operations require the storage and use of relatively small quantities of chemicals and materials that could be considered to have potential for causing material harm. However, the Site is located in close proximity to sensitive environmental receptors such as White Bay and the residential precincts of Balmain and Rozelle (Refer to Figure 1).

Key Site operations and controls include:

- EPA licensed discharge point 1 (Discharge to stormwater pit);
- Gypsum unloading operations and facilities;
- Gypsum management (i.e. on-site movements and storage);
- Chemical storage (small volumes of diesel, oil, solvents, paints and lubricants);
- Stormwater storage and management;
- Waste management;
- Heavy vehicular movement and operations in relation to Gypsum movements/storage;
- Maintenance of operational equipment;
- Environmental monitoring and reporting systems; and
- Documentation management with respect to environmental reporting obligations.

Figure 1: Site Operational Boundary and Surrounding Locality

Image sourced from Google Earth on 27/08/16

2 INVENTORY AND RISK ASSESSMENT

NSW EPA have previously conducted a Risk Assessment on the Site operations as part of the risk-based licensing system that commenced in July 2015. The Site was determined as a Level 2 Risk - which is the medium risk ranking.

The Site operations involve the storage and management of small volumes of chemicals, materials and equipment, some of which if not appropriately managed have potential to adversely impact upon the environment and human health.

Table 1 provides an inventory of substances required as part of Site operations and a risk assessment on the likelihood and consequence of an associated pollution incident. The respective risk rankings are based on the most severe incident associated with each of the substances using the risk matrix presented in Table 2.

Table 1: Inventory of Substances with Potential for Material Harm

Substance / Incident	Max Quantity	Risk Assessment		Risk Ranking (See Table 2)
		Consequence	Likelihood	
Diesel (Catastrophic failure resulting in total volume loss)	1,000L Self-bunded	2	1	**Low**
Fuel (Petrol & Diesel) Leaking - ruptured fuel tank of parked employee/visitor/truck vehicles that could eventually enter stormwater drains and/or surface waters	1,000L All vehicles collectively at any time	1	1	**Low**
Used Oils (Spill/Leak entering stormwater drains and/or surface waters)	800L	1	2	**Low**
Packaged Solvents/Paints/Grease/Lubricants (Spill/Leak entering stormwater drains and/or surface waters)	500L Collectively at any time	1	2	**Low**
Gypsum Possible fugitive discharges from hoppers and conveyor during ship delivery and loading of trucks that could eventually enter stormwater drains and/or surface waters	30,000 Tonne	1	2	**Low**

Table 2 – Risk Assessment Matrix

Measures of Consequence		
Value	**Description**	**Impact**
1	Minor	On-site release immediately contained or rectified
2	Moderate	On-site release contained with outside assistance
3	Major	Off-site release with specialist assistance and clean up required

Measures of Likelihood		
Value	**Description**	**Impact**
3	Highly Likely	The event could occur weekly in normal circumstances
2	Likely	The event could occur once per month
1	Unlikely	The event could occur once every one to five years

Risk Ranking			
LIKELIHOOD	**CONSEQUENCE**		
	Minor (1)	**Moderate (2)**	**Major (3)**
Highly Likely (3)	M (3)	H (6)	H (9)
Likely (2)	L (2)	M (4)	H (6)
Unlikely (1)	L (1)	L (2)	M (3)

3 PRE-EMPTIVE MEASURES

Pre-emptive measures implemented to minimise the risk of a pollution incident associated with key Site activities and materials include the following:

3.1 PIRMP ADMINISTRATION

A copy of the PIRMP will be available on-site at all times. The PIRMP will be the subject of annual training and testing amongst relevant Site Managers/employees, and contractors to ensure at all times there is a high level of awareness of response requirements in preventing, minimising and responding to potential harm to the environment or human wellbeing during a pollution incident.

The PIRMP will be the subject of at least an annual review or within 30-days of a pollution incident. Any revised versions of the PIRMP will be posted on the GRA website within 14-days of internal approvals of amendments.

Inductions of new employees, contractors and visitors will include key aspects of the PIRMP such as alarm warnings, emergency evacuation points and safety muster locations to minimise potential harm to people on or likely to be on the Site during a pollution incident.

3.2 STORAGE AND MANAGEMENT OF POTENTIAL POLLUTANTS

3.2.1 Diesel and Chemical Storage

- Diesel storage comprises of a 1,000 L aboveground self-bunded storage tank located within the gypsum storage facility (Refer to Figure 2);
- The refueling area is sealed and has a Spill Kit in close proximity to contain any minor leaks and spills – there is also an abundance of gypsum that could be used in the containment and absorption of potential spills;
- Storage of used oils and packaged chemicals (i.e. oils, solvents, grease and paints) is undertaken in within the roofed gypsum storage facility away from any immediate stormwater drain;
- The diesel tank, refueling area and chemical storage facility are inspected and managed in accordance with GRA Standard Operating Procedure (GLE-SWP-002) for safety/environmental controls, emergency response, periodic inspection and maintenance;
- During on-site movements, bulk and packaged chemicals are secured to minimise potential for spills;
- Fire-fighting and spill response equipment are readily accessible for incident response; and

- Stock inventory and control is undertaken to minimise on-site quantities and volumes of potential pollutants.

3.2.2 Stormwater Drains and Discharge Point

The Site has two stormwater drains servicing the car park area one of which flows directly into the on-site stormwater containment pit and the other drains into White Bay (see Figure 2). Both the drains are fitted with silt/sediment traps that are regularly inspected and serviced when required. The car park area is also serviced by a concrete stormwater pit with an overflow weir which is also the EPA Licensed discharge point. The water quality (i.e. Colour, Oil & Grease, pH and TSS) in the stormwater pit is monitored and sampled prior to any discharge over the weir into White Bay in accordance with a GRA Standard Operating Procedure (GLE-SWP-010) for EPA Licence compliance requirements.

3.2.3 Air Quality

The Site manages air quality in accordance with EPL requirements which includes the following actions:

- Gypsum storage facility is fully covered preventing any potential for fugitive emissions;
- Gypsum unloading from ships is undertaken in accordance with a GRA Standard Operating Procedure (GLE-SWP-005) via enclosed hoppers and conveyors to minimise potential for any fugitive releases;
- Gypsum received at the Site has a moisture content that reduces the potential for windborne releases into the atmosphere during unloading/loading events; and
- Gypsum loading of trucks for transport is undertaken within a dedicated loading bay with controls on potential fugitive emissions.

3.2.4 Equipment and Vehicles

- The hydraulic and fuel systems of heavy vehicles are subject to a scheduled maintenance program;
- The Site equipment also includes two bob-cat operated street sweepers which are used when required to ensure the car park and trafficable areas present minimal potential for dust emissions or stormwater impacts; and
- Spill kits are regularly inspected for contents and replenished if used/required.

4 PIRMP ACTIVATION

4.1 PIRMP RESPONSE TEAM

The PIRMP will be activated in the event of an incident causing or potential to cause material harm by the authorised GRA response team list in Table 3. Pending the nature and severity of a pollution incident, there may be a requirement to engage external specialist emergency response assistance and contact details are also provided in Table 3.

Table 3: PIRMP Team Roles and Responsibilities

PIRMP Response Team	Roles & Responsibilities	Contact Details
Chris McLaughlin (Site Manager) **Available 24 hours**	• Receives internal notification of an incident and response updates • Provides notification to Authorities and provides updates • Provides notification and updates to neighbours • Coordinates with Emergency Services if providing on-site response assistance	**Phone:** (02) 9555 9616 **Mobile:** 0409 035 088 **Email:** Chris.McLaughlin@gragypsum.com.au
Site Employees (PIRMP Response Team)	• Provides immediate response in accordance Table 4 Actions with using with appropriate PPE • Communicates incident and response status Plant Manager • Assist with the coordinates with Emergency Services if providing on-site response assistance • Ensures appropriate response resources are maintained and replenished after the incident • Assist with incident investigation and implementation of learnings • Assist with PIRMP review after incident	
Tim Lange (GRA Bulk Logistics Manager) **Available 24 hours**	• Provides back-up reporting and Authority notification for Site Manager • Provides Site Manager with resources for the implementation, response requirements and testing of the PIRMP	**Mobile:** 0417 810 746
Gary Lindholm (GRA Safety Advisor) **Available 24 hours**		**Mobile:** 0477 853 898
Cleanaway **Available 24 hours**	Assistance with post emergency response and clean-up of significant spill events if required	Emergency Spill Hotline: **1800SPILLS**

4.2 PIRMP ACTIONS

Figures 2a and 2b present the locations where risk of pollution incidents causing material harm to either water, land and air will require the activation of the PIRMP. Table 4 details specific PIRMP actions in response to potential pollution incidents associated with each of the locations.

Figure 2a: Locations with Potential for Material Harm Pollution Incidents

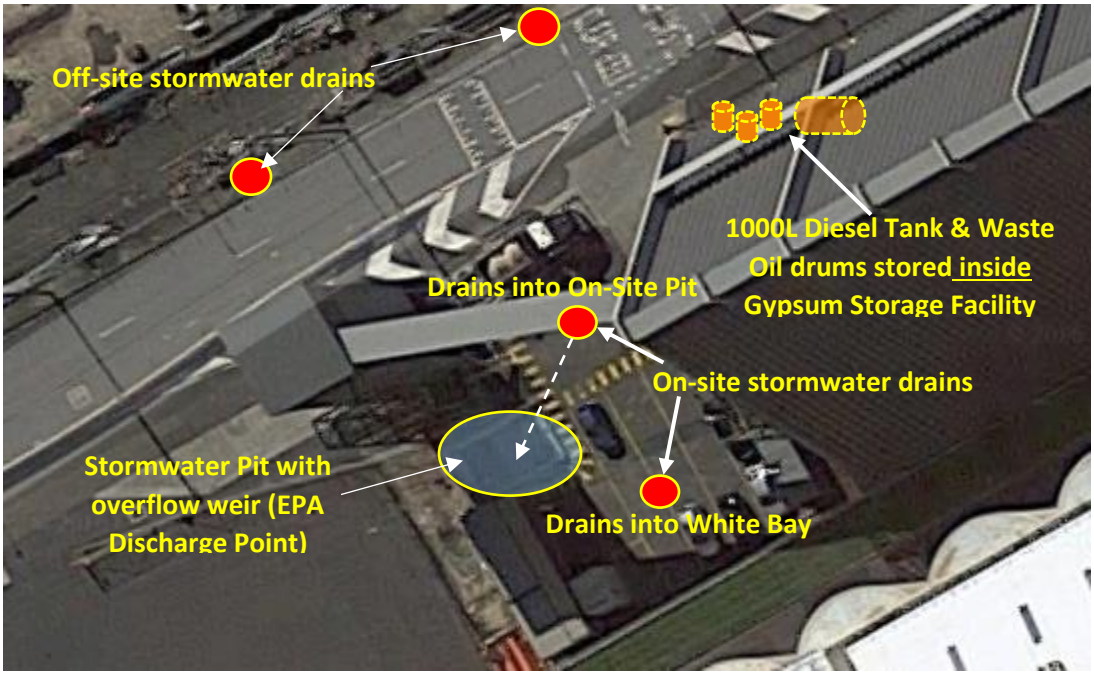

Figure 2b: Locations with Potential for Material Harm Pollution Incidents

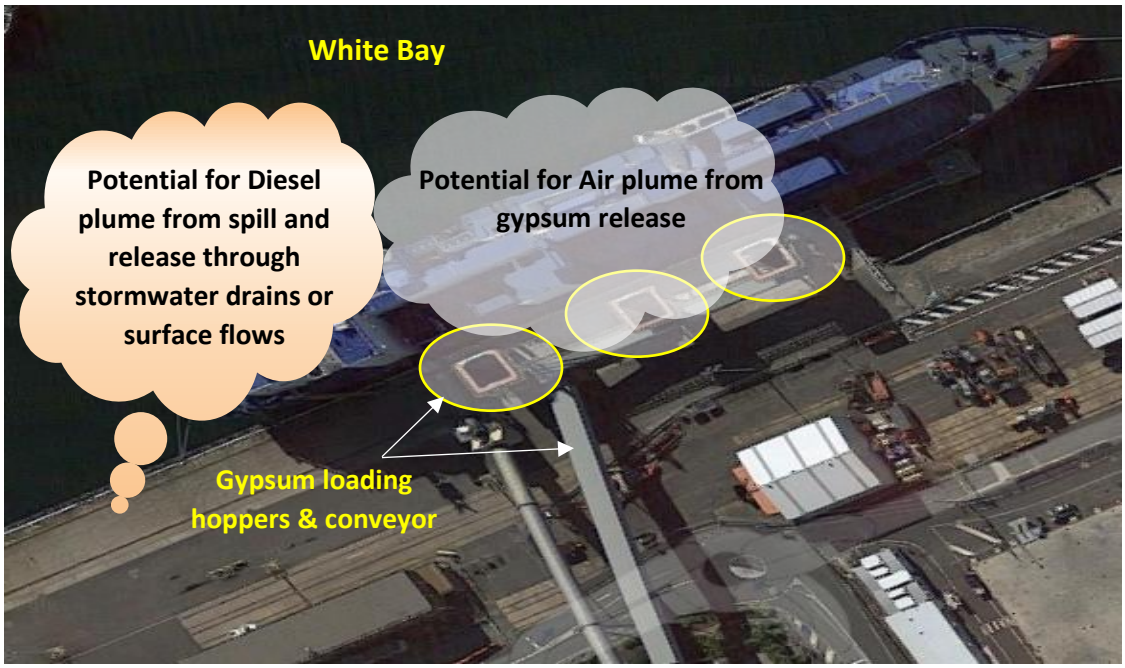

Table 4: PIRMP Actions

Pollution Incident	PIRMP Action	Post-PIRMP Action
No.1: Extreme Diesel / Petrol related spill – see Figures 2a and 2b for potential source and extent of impact**.** There is potential for direct surface release of diesel / petrol or through contaminated stormwater beyond Site boundaries and into water courses (i.e. White Bay). .	• Using appropriate PPE stop or restrict source of spill / leak • Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates • Contact local neigbours **(refer to Section 5.2**) if potential to be impacted by diesel / petrol impacted water and provide periodic updates • Incident area to be restricted to PIRMP Response Team, Authorities, and specialised emergency response personnel if in attendance • Evacuate non-essential GRA personnel, contractors and Site visitors if required • Undertake all possible actions to prevent / minimise diesel / petrol entering stormwater drains and concrete pit – i.e. Use of spill kits and construction of gypsum bunds and diversions around spill to contain/divert spill until external incident response specialists arrive with more specialised resources and equipment • Co-ordinate with Authorities and specialised emergency response personnel (as required) • Engage professional service provider to pump-out any contained/captured diesel/petrol, clean-up and appropriately dispose of waste generated	• Provide update to all Authorities and neighbours contacted during the incident • If diesel/petrol spill has impacted unsealed soil/surface water – engage Environmental Consultants to investigate and remediate as required contamination to soil, surface waters (i.e. White Bay) • Assess Duty to Report contamination to EPA under S60 of the *Contaminated Land Management Act (1997)* • Engage environmental consultants to commence water quality monitoring program to assess any ongoing contamination issues associated with White Bay (i.e. there may be residual contamination in stormwater drains) • Check and replenish response equipment/resources • Dispose of contaminated response material through licensed contractor • Investigate incident and review PIRMP within 30-days of incident • Implement incident investigation learnings – including tank/bund design/maintenance and PIRMP response efficiency

		• Communicate investigation and corrective actions to Authorities and neighbours
No 2: Extreme gypsum release during with ship deliveries There is potential during ship deliveries for particulate air impacts adversely impact upon the surrounding environment and amenity of neighbours	• Contact all relevant Authorities **(refer to Section 5.1**) and provide periodic updates • Contact local neigbours **(refer to Section 5.2**) with potential to be adversely impacted by gypsum emissions and provide periodic updates • Cease and rectify activities contributing to the gypsum emissions	• Provide update to all Authorities and neighbours contacted during the incident • Offer clean-up of houses and cars impacted by gypsum emissions • Investigate incident and review PIRMP within 30-days of incident • Implement incident investigation learnings • Communicate investigation and corrective actions to Authorities and neighbours

5 PIRMP NOTIFICATION AND COMMUNICATION

5.1 NOTIFICATION OF AUTHORITIES

In the event of a pollution incident causing or potential to cause material harm, the Site Manager or Back-up GRA nominees (see Table 3) will notify the Authorities listed in Table 5. All Site employees and Contractors must either through inductions and training be aware of reporting any actual or potential pollution incidents directly to Site Manager (or Back-up nominees).

If the incident has an immediate threat to human health or property, Emergency Services will be the first of the Authorities to be contacted as they will be able to provide initial advice and if requited, on-site assistance in controlling, containing and combating incidents.

If the incident does not require emergency services, or once the triple 000 call has been made, notification of the other relevant Authorities listed in Table 5 must be undertaken.

The information to be provided to the Authorities will include the following:

- The time, date, nature, duration and location of the incident
- The estimated quantity or volume of any pollutants involved
- An initial understanding of the circumstances in which the incident occurred
- The action taken or proposed to be taken by internal and external resources to deal with the incident and any actual or potential pollution arising from the incident

Table 5: Compulsory Authority Contact Details

Authority	Contact Details.	Notification Responsibility
Emergency Services • Fire and Rescue NSW • NSW Police • NSW Ambulance Service	Call: 000	Either of the following GRA personnel are responsible for notification to Authorities: Chris McLaughlin (Site Manager) Mobile: 0409 035 088 (Available 24hrs) Tim Lange (GRA Bulk Logistics Manager) Mobile: 0417 810 746 (Available 24hrs)
NSW EPA	131 555	
WorkCover Authority	131 050	
Leichhardt City Council	(02) 4429 3111	
Camperdown Public Health Unit	(02) 9515 9420	

5.2 NOTIFICATION – SYDNEY PORTS CORPORATION

An environmental incident with a potential to impact on local environment (i.e. waterways) may also require a response on behalf of the Sydney Ports Corporation.

The Sydney Ports Incident Controller is the person appointed by Sydney Ports Corporation to direct the overall response operation and to co-ordinate the activities involved in the incident response or clean up.

Contact for Sydney Ports Harbour Control (24 Hours):

- Phone: (02) 9296 4000 or
- Mobile: 0427 042 333

5.3 COMMUNICATIONS WITH NEIGHBOURS AND COMMUNITY

In the unlikely event that immediate neigbours or the wider community may be impacted by a pollution incident associated with GRA Glebe Island operations, the Site Manager as deemed appropriate will either contact the Community Liaison Group Coordinator, phone, email, text or door knock neighbouring residents to provide the following information:

- Nature of the incident, response being undertaken and any precautions that may be required to reduce the risk of impact on their health and amenity;
- Likely duration and periodic updates on the status of the incident;
- End of incident response and any associated residual risks that may exists until appropriate clean-up/remediation can be completed; and
- Summary of incident investigation and learning to minimise a repeat of the event.

6 PIRMP TESTING AND TRAINING

6.1 PIRMP TESTING

The PIRMP will be tested and reviewed on at least an annual basis or within a month (30 days) of a pollution incident occurring at the Site. A summary report will be prepared for each PIRMP test that will detail results and learnings against the scope and actions presented in Table 6.

Table 6: Scope and Actions of PIRMP Tests

Scope / Action
Include PIRMP Response Team and Site Manager (and nominated GRA personnel with PIRMP responsibilities)
Response to simulated pollution incident associated with activities, equipment and materials associated with Site operations (i.e. under rain / dry / windy scenarios and during ship deliveries)
Communication and notification with Site Managers, Authorities, Sydney Ports Corporation, and neighbours/communities
Level of availability, awareness, efficiency and effectiveness in the use of incident response resources
On-site coordination with external response services/Authorities - pending incident severity
Minimising harm to people on-site - simulated incident to include requirement for site warning alarm / evacuations
Combating/minimising the pollution caused by incident
Discuss - Inspection, maintenance and replenishment of response equipment/materials used in responding to incident
Discuss - Clean-up and disposal of contaminated response materials through licensed contractor
Prepare Summary Report of the simulated PIRMP Test
Review of PIRMP to reflect any learnings from simulated PIRMP Test – if review results in revised version of the PIRMP the amended version will be posted on the GRA website within 14-days.
Schedule next PIRMP Test

6.2 PIRMP TRAINING

PIRMP training will be conducted through either formal awareness sessions, inductions, toolbox style presentations or simulated incidents. The frequency of training will be at least annually for the PIRMP response team and Site Manager (and nominated GRA back-up personnel). Training will also be provided to new employees and contractors through inductions and on an as required basis. A training register will be maintained detailing attendees and the manner in which training was provided.

The objective of the training will be to ensure Plant Managers, incident response team, relevant site employees and contractors are aware of the pollution risks associated with operations, response equipment and materials and they know of their roles and responsibilities in the administration and activation of the PIRMP.

6.3 PIRMP TRAINING AND TESTING SCHEDULES

Routine PIRMP training and testing will be conducted in accordance with dates and scope presented in Table 7.

Table 7: Completed and Scheduled PIRMP Training and Tests

Date	Test / Training	Scope	Status
22/05/2023	Training	POEO Act/Regulation Requirements Attendees included: • Chris McLaughlin (Site Manager) • Scott Taylor (PIRMP response team) • Oskar McLaughlin (PIRMP response team)	Completed
No later than of 30 June 2024	**Test/Training**	**To be determined**	**Date Requires Schedule Confirmation**