

# Sulcor Pollution Incident Response Management Plan (PIRMP)

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**The Sulcor Limestone open cut mine is located 30Km north-west of Tamworth NSW. The limestone mined by conventional drill and blast processes is utilised in the Company's lime manufacturing plant located at Attunga, 8Km south-west of Sulcor.**

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# 1 INTRODUCTION

## 1.1 Purpose

This Pollution Incident Response Management Plan (PIRMP) focuses on the management of pollution incidents at Sulcor. The purpose of the PIRMP is to ensure site readiness in the event of a pollution incident. The PIRMP applies to all pollution incidents that occur at the site as a result of activities carried out by Graymont.

## 1.2 Compliance Background

In February 2012, amendments were made to the NSW Protection of the Environment Operations Act 1997. These amendments introduced the requirement for holders of an environment protection license (EPL), to prepare and implement a Pollution Incident Response Management Plan (PIRMP). This PIRMP has been developed to satisfy the new compliance requirements.

## 1.3 HSE System Context

A critical component of the Graymont environment, health and safety system is the management of safety and environmental incidents. Existing policies, procedures and plans provide guidance on incident response. The PIRMP shall be implemented in addition to the other existing policies, procedures and plans, as they relate to pollution incident response. Where an inconsistency exists, the PIRMP shall take precedence to the extent of the inconsistency.

Existing procedures and plans that may be relevant include:

- HSE Incident Notification & Investigation Procedure (Corporate)
- Site Incident Response Planning Procedure (Corporate)
- Rapid Response Management Procedure (Corporate)
- Emergency Response Procedures (Site-specific)

## 1.4 Definitions

**Air pollution:** the emission into the air of any air impurity

**Air impurity:** includes smoke, dust (including fly ash), cinders, solid particles of any kind, gases, fumes, mists, odours and radioactive substances

**Land pollution:** placing in or on, or otherwise introducing into or onto, the land (whether through an act or omission) any matter, whether solid, liquid or gaseous:

- a. that causes or is likely to cause degradation of the land, resulting in actual or potential harm to the health or safety of human beings, animals or other terrestrial life or ecosystems, or actual or potential loss or property damage, that is not trivial, or
- b. that is of a prescribed nature, description or class or that does not comply with any standard prescribed in respect of that matter, but does not include placing in or on, or otherwise introducing into or onto, land any substance excluded from this definition by the regulations.

**Material harm:**

- a. harm to the environment is material if:
  - i. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - ii. 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

- 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.

**Noise:** includes sound and vibration

**Noise pollution:** the emission of offensive noise

**Pollution:** water pollution, or air pollution, or noise pollution, or land pollution

**Pollution incident:** 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

**Water pollution:**

- a. placing in or on, or otherwise introducing into or onto, waters (whether through an act or omission) any matter, whether solid, liquid or gaseous, so that the physical, chemical or biological condition of the waters is changed, or
- b. placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any refuse, litter, debris or other matter, whether solid or liquid or gaseous, so that the change in the condition of the waters or the refuse, litter, debris or other matter, either alone or together with any other refuse, litter, debris or matter present in the waters makes, or is likely to make, the waters unclean, noxious, poisonous or impure, detrimental to the health, safety, welfare or property of persons, undrinkable for farm animals, poisonous or harmful to aquatic life, animals, birds or fish in or around the waters or unsuitable for use in irrigation, or obstructs or interferes with, or is likely to obstruct or interfere with persons in the exercise or enjoyment of any right in relation to the waters, or
- c. placing in or on, or otherwise introducing into or onto, the waters (whether through an act or omission) any matter, whether solid, liquid or gaseous, that is of a prescribed nature, description or class or that does not comply with any standard prescribed in respect of that matter,  
and, without affecting the generality of the foregoing, includes:
- d. placing any matter (whether solid, liquid or gaseous) in a position where:
  - a. it falls, descends, is washed, is blown or percolates, or
  - b. it is likely to fall, descend, be washed, be blown or percolate, into any waters, onto the dry bed of any waters, or into any drain, channel or gutter used or designed to receive or pass rainwater, floodwater or any water that is not polluted, or
- e. placing any such matter on the dry bed of any waters, or in any drain, channel or gutter used or designed to receive or pass rainwater, floodwater or any water that is not polluted, if the matter would, had it been placed in any waters, have polluted or have been likely to pollute those waters.

**Waters:** the whole or any part of:

- a. any river, stream, lake, lagoon, swamp, wetlands, unconfined surface water, natural or artificial watercourse, dam or tidal waters (including the sea), or
- b. any water stored in artificial works, any water in water mains, water pipes or water channels, or any underground or artesian water.

## 2 RISK ASSESSMENT

The following section describes the hazards to human health or the environment, associated with the operations at Sulcor, along with the risk management for each hazard.

### 2.1 Risk Register

The hazards to human health or the environment are described in the site risk register (refer to Appendix A – Sulcor Risk Register). The risk register also includes details of the following:

- the receiving environment that could be harmed by the hazard;
- the risk event that could occur as a result of the hazard harming the receiving environment (including neighbouring premises);
- likelihood of the risk event occurring;
- rating of the consequence of the risk event occurring; and
- details of the pre-emptive action to be taken to mitigate the risk of harm to human health or the environment.

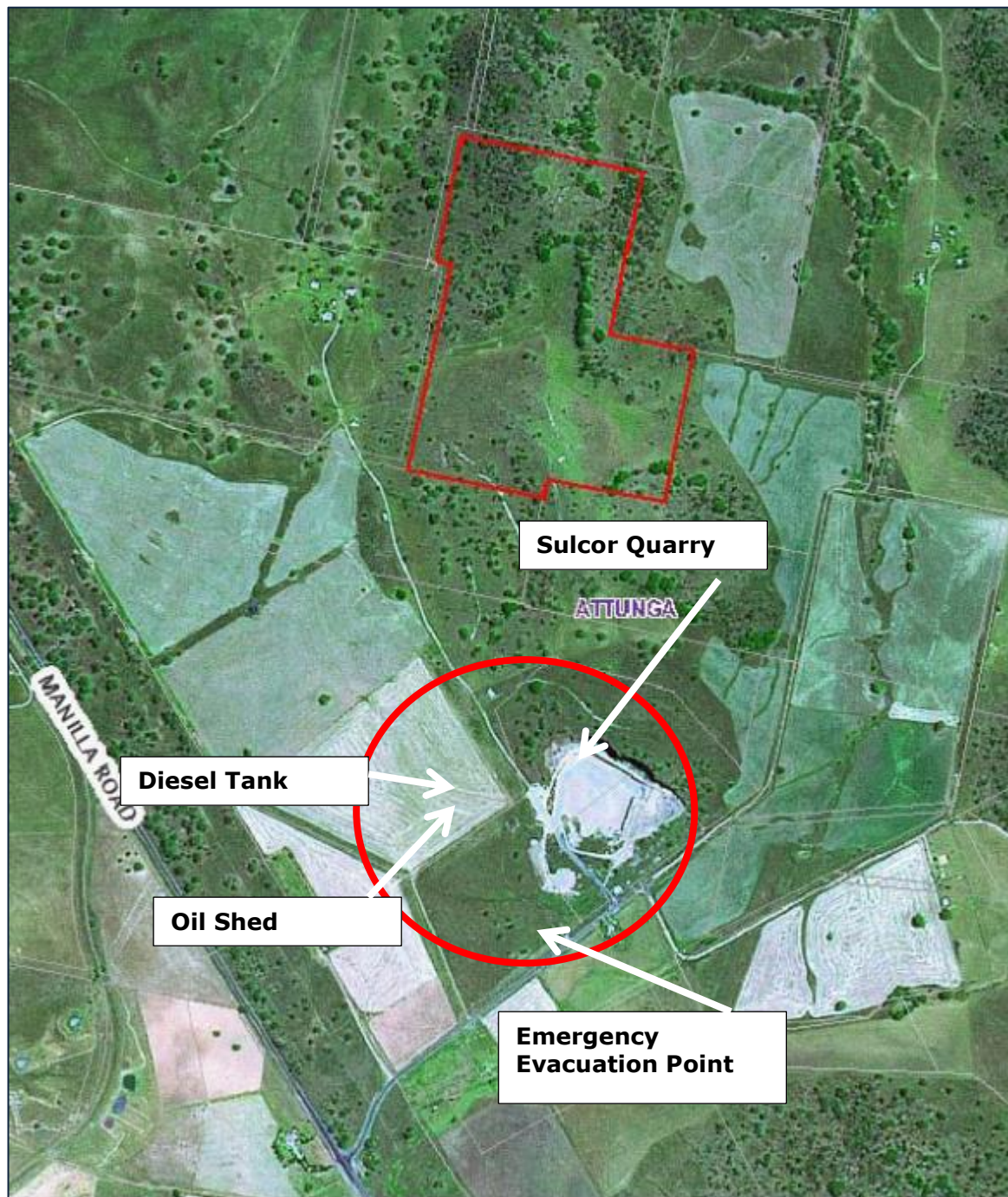
### 2.2 Inventory of pollutants

The following potential pollutants identified in the risk register, are kept on the premises or are used in site operations during campaign periods only.

Pollutant	Maximum quantity held onsite
Diesel	30,000L
Engine and Hydraulic Oil	200L

## 2.3 Site Plan

The following site plan illustrates the location of Sulcor, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and evacuation muster points.



### 3 POLLUTION INCIDENT RESPONSE

#### 3.1 Immediate Response

See it, stop it, report it is one of Graymont's Lifesaving rules and is critical for that first line of defence.

# See it – Stop it – Report it

#### 3.1.1 Minimising Harm

In the event of a pollution incident, the immediate response will involve actions to minimise harm to human health, followed by actions to minimise harm to the environment.

Immediate response to pollution incidents will vary according to the circumstances, however the general approach for all pollution incidents will be as follows:

- i. Control the source of the incident  
Controlling the source may include actions such as operational shutdown of equipment and activation of shut-off valves.
- ii. Contain the incident  
Containing the incident may include the deployment of spill response kits or the activation of evacuation procedures (refer to section 3.2 below).

Equipment that will be used to minimise harm to human health is described in the following table.

Equipment	Location of equipment
Firefighting equipment	Diesel tank bund
Personnel protective equipment	As issued to employees and contractors

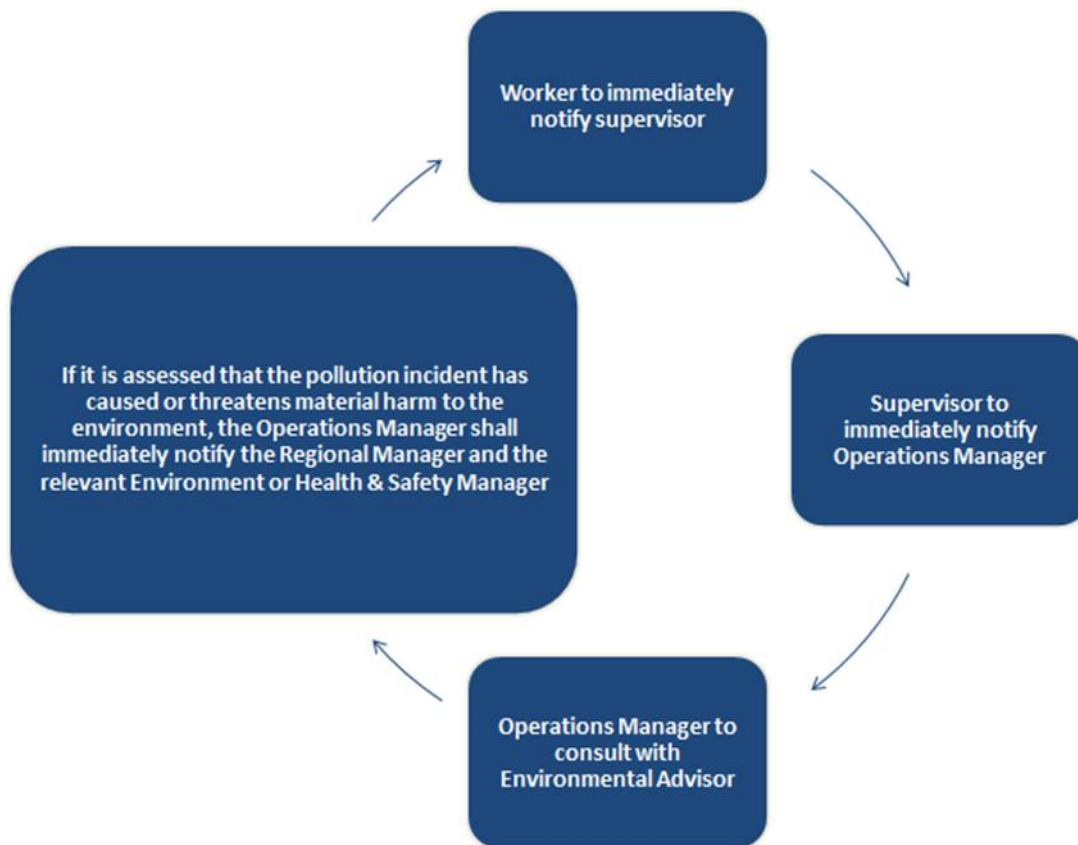
Equipment that will be used to minimise harm to the environment is described in the following table.

Equipment	Location of equipment
Loader	Site
Bund	Diesel tank
Spill kit	Oil shed (Container)

#### 3.1.2 Incident Classification

Incident classification will be undertaken using the Incident Classification Table (refer to Appendix B).

### 3.1.3 Internal Notification



All workers onsite shall immediately notify their Supervisor of all pollution incidents that occur on the premises, or as a result of activities carried out by Graymont personnel or contractors. The Supervisor shall immediately notify the Operations Manager of the pollution incident.

The Operations Manager shall immediately after being notified of the pollution incident, consult with the Health Safety and Environmental Advisor to assess whether the pollution incident has caused or threatens material harm to the environment. In the event that the Health Safety and Environmental Advisor cannot be contacted, the Regional Manager shall consult with the relevant Environment or Health & Safety Manager.

If it is assessed that the pollution incident has caused or threatens material harm to the environment, the Operations Manager shall immediately notify the Regional Manager and the relevant Environment or Health & Safety Manager. Incidents classified at this level will automatically be classified as "high impact incidents". The Rapid Response Management Procedure will therefore be implemented, in addition to the PIRMP.

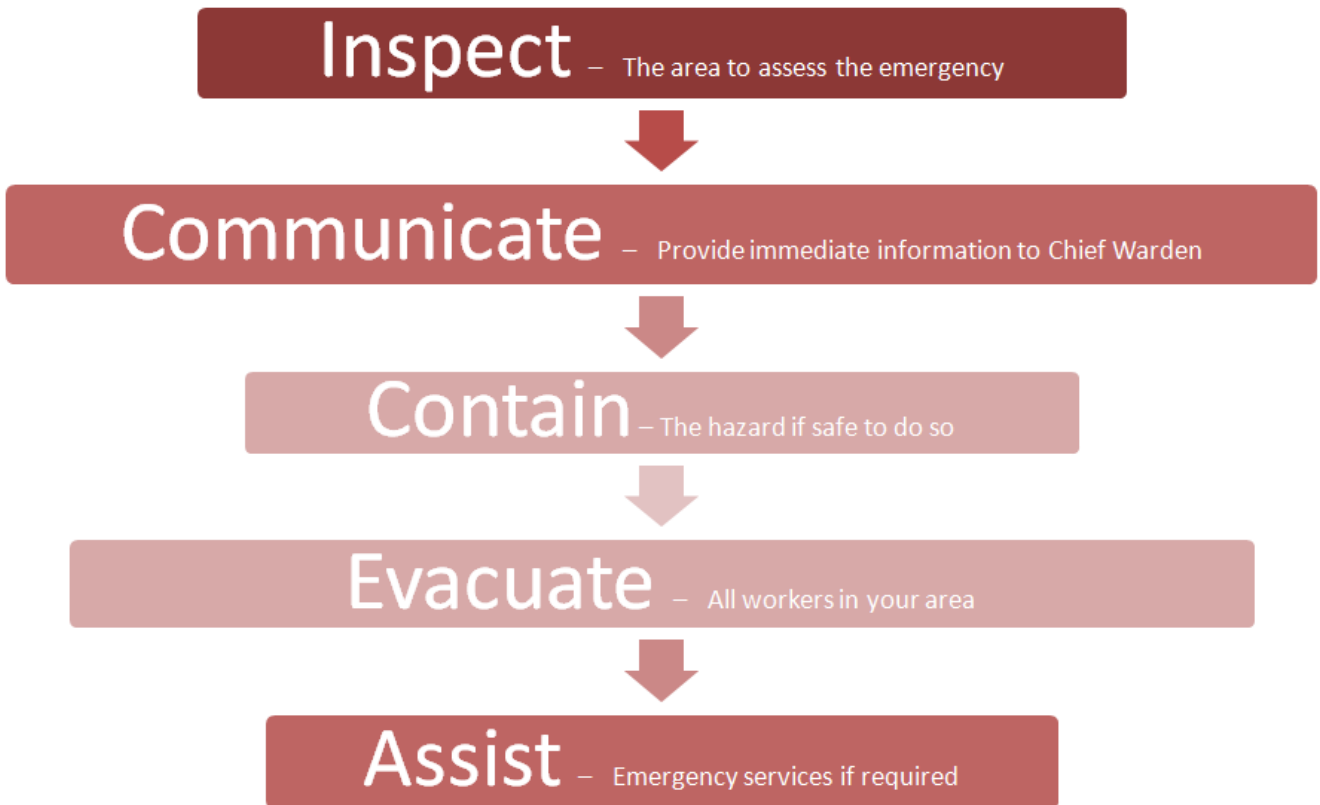
If it is assessed that the pollution incident has not caused or does not threaten material harm to the environment, the Operations Manager shall follow internal incident reporting procedures.

External notification of pollution incidents is addressed further below.



### 3.2 Evacuation

In order to minimise harm to persons on the premises, all Emergency Team members will:



All, workers will ensure that they:



NOTE: Refer below to the Emergency Evacuation plan (Plan 3)

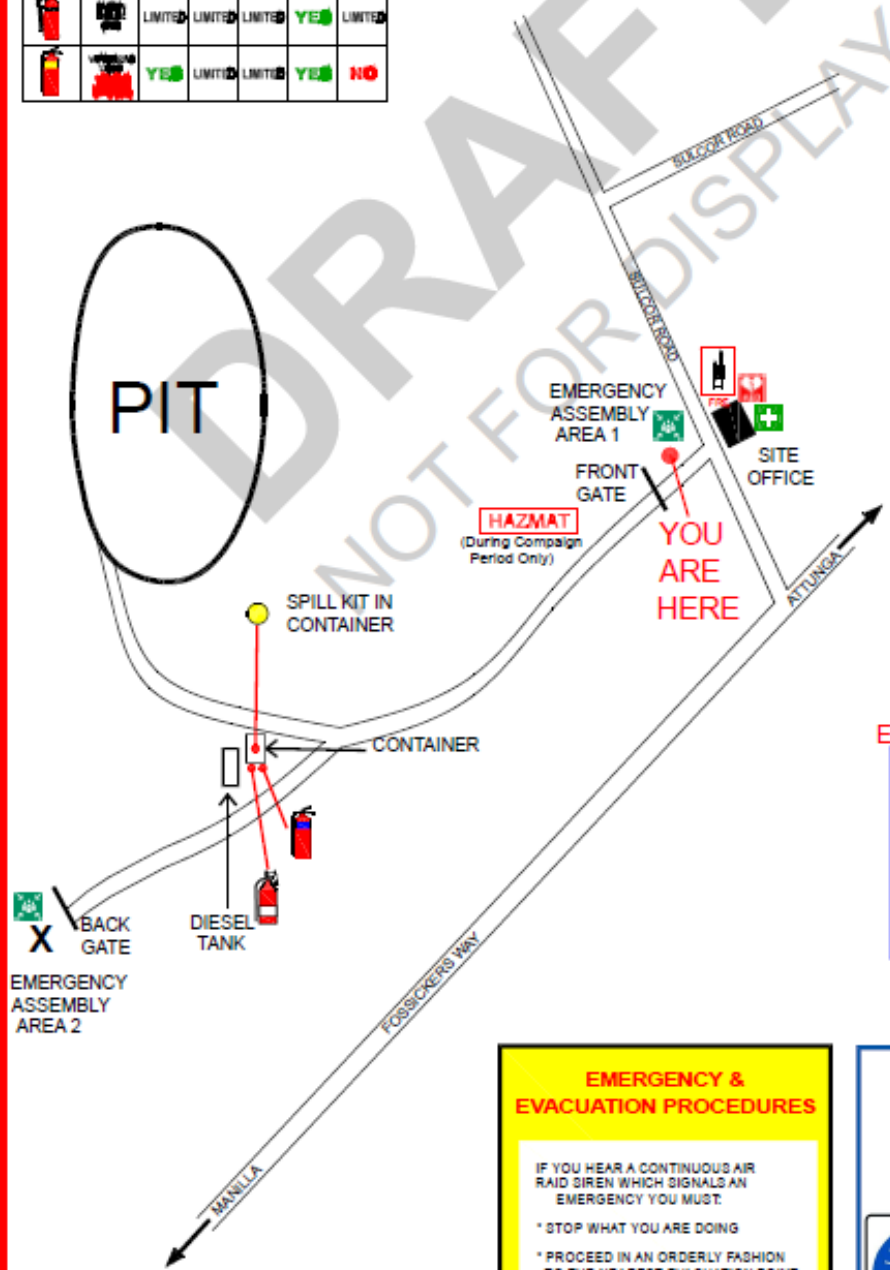
#### Plan 3 – Emergency Evacuation Plan

Fire Extinguisher Selection Chart						
CLASS OF FIRE	A	B	C	D	F	
TYPE OF FIRE	1	2	3	4	5	6
CO2	WATER	FOAM	DRY CHEMICAL	WET CHEMICAL	WET CHEMICAL	WET CHEMICAL
	YES	NO	NO	NO	NO	NO
	YES	NO	NO	NO	NO	YES
	YES	YES	NO	NO	LIMITED	
	YES	YES	YES	YES	NO	
	NO	YES	YES	YES	LIMITED	
	LIMITED	LIMITED	LIMITED	YES	LIMITED	
	YES	LIMITED	LIMITED	YES	NO	



SULCOR ROAD, ATTUNGA

# EVACUATION DIAGRAM



**LEGEND**

- 5kg DCP FIRE EXTINGUISHER
- 9 LITRE FOAM FIRE EXTINGUISHER
- SPILL KIT
- EMERGENCY ASSEMBLY AREA
- FIRST AID KIT (During Campaign Period Only)
- AUTOMATIC EXTERNAL DEFIBRILLATOR (During Campaign Period Only)
- HAZMAT (During Campaign Period Only)
- Fix Radios for Evacuation  
Note: All Fire Wardens carry Radios (UHF 25) for Evacuation

## EXTINGUISHER OPERATION

To operate an extinguisher:

**P**ull  
**A**im  
**S**queeze  
**S**weep

Remember: pull an extinguisher from the correct extinguisher.

## MANDATORY PPE

- SAFETY GLASSES MUST BE WORN IN THIS AREA
- SAFETY HELMETS MUST BE WORN ON THIS SITE
- SAFETY VEST MUST BE WORN
- PROTECTIVE CLOTHING MUST BE WORN IN THIS AREA
- FOOT PROTECTION MUST BE WORN IN THIS AREA

**EMERGENCY & EVACUATION PROCEDURES**

IF YOU HEAR A CONTINUOUS AIR RAID SIREN WHICH SIGNALS AN EMERGENCY YOU MUST:

- \* STOP WHAT YOU ARE DOING
- \* PROCEED IN AN ORDERLY FASHION TO THE NEAREST EVACUATION POINT
- \* AWAIT & FOLLOW INSTRUCTIONS GIVEN BY SITE EMERGENCY WARDENS OR SIBELCO REPRESENTATIVE

**DYNAMICFIRE**  
Fire Protection Specialists  
Unit 1, 88 Barnes Street, Tamworth NSW 2340  
24 Hour Sales & Service  
Phone: 1300 896 499

ISSUE DATE: 19/5/2015      REVIEW DATE: 19/5/2020



### 3.3 Notify Stakeholders

As soon as the immediate response actions have been carried out to ensure the safety of people or to contain a pollution incident, relevant external stakeholders shall be notified.

The notification process is described in the Public Notification Procedure (refer to Appendix C) and includes the following:

- internal notification process;
- notification of neighbouring industrial, residential or community premises;
- notification of relevant authorities; and
- mechanisms for early warnings and regular updates to external stakeholders.

Where external notification is required, stakeholders will be notified with reference to the Stakeholder Contact List (refer to Appendix D).

### 3.4 Clean up

Once the immediate response actions have been completed and relevant stakeholders have been notified, the strategy for clean-up of the pollution incident shall be developed and implemented.

Where relevant, the Regional Manager shall co-ordinate with the relevant authorities or persons that have been notified, the strategy for cleaning-up the pollution caused by the incident.

### 3.5 Response Personnel

The personnel responsible for incident response are as follows:

Position	Name	Contact	Responsibility
Operations Manager	Damian Power	0418 694 670	Activation of the plan and managing the response to a pollution incident.
Regional Manager	Prem Chand	0438 774 457	Authorised to notify relevant authorities.

## 4 TRAINING AND TESTING

### 4.1 Pollution Incident Response Training

Training of personnel in incident response will occur at least annually, in the form of toolbox talks or simulated incident exercises. The frequency of training will be commensurate with the risk of pollution incidents at the site.

### 4.2 PIRMP Testing

The PIRMP will be tested routinely to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in an effective and efficient manner.

The PIRMP will be tested on an annual basis and also within one month of any pollution incident occurring. Routine testing will be undertaken in the form of either desktop simulations or practical exercises or drills.

## 5 APPENDIX A – RISK REGISTER

## 6 APPENDIX B – INCIDENT CLASSIFICATION TABLE

	Environment and Community	Health and Safety	Financial
<b>Catastrophic</b>	<ul style="list-style-type: none"> <li>• Permanent impacts to populations of rare or threatened flora or fauna; or</li> <li>• Adverse impacts (i.e. damage, destruction or removal) to a state or nationally listed indigenous or non-indigenous heritage item; or</li> <li>• Complete removal of habitat of threatened species; or</li> <li>• Significant impairment of ecosystem function; or</li> <li>• Multiple negative media reports; or</li> <li>• Legal action initiated by member of the community.</li> </ul>	<ul style="list-style-type: none"> <li>• One or more fatalities</li> </ul>	<ul style="list-style-type: none"> <li>• &gt;\$1M business impact</li> </ul>
<b>Major</b>	<ul style="list-style-type: none"> <li>• Removal, destruction or loss of whole populations of common native flora and/or fauna; or</li> <li>• Adverse impacts to non-listed or locally significant indigenous or non-indigenous heritage items; or</li> <li>• Negative media report or multiple community complaints.</li> </ul>	<ul style="list-style-type: none"> <li>• Injury or illness that requires hospitalisation and/or results in permanent impairment</li> </ul>	<ul style="list-style-type: none"> <li>• \$100k-\$1M business impact</li> </ul>
<b>Moderate</b>	<ul style="list-style-type: none"> <li>• Loss of individual member of rare or threatened species; or</li> <li>• Extensive impacts on soil, air or water that requires coordinate clean-up; or</li> <li>• Offsite discharges/emissions outside of advised levels (e.g. license limit, or environmental advisor / consultant advice) or;</li> <li>• Individual community complaint</li> </ul>	<ul style="list-style-type: none"> <li>• Injury or illness more severe than a sprain, strain or superficial wound that requires medical treatment and/or a temporary work restriction (e.g. breaks, fractures, lacerations, burns, torn ligaments)</li> </ul>	<ul style="list-style-type: none"> <li>• \$50-100k business impact</li> </ul>
<b>Minor</b>	<ul style="list-style-type: none"> <li>• Contamination of any on-site water body or impacts on soil and air quality beyond immediate work area but contained onsite; or</li> <li>• Loss of individuals of common (not threatened) native flora or fauna.</li> </ul>	<ul style="list-style-type: none"> <li>• Sprain, strain, or superficial wound (i.e. bruise, cut, abrasion) that requires medical treatment and/or a temporary work restriction</li> </ul>	<ul style="list-style-type: none"> <li>• \$10-50k business impact</li> </ul>
<b>Insignificant</b>	<ul style="list-style-type: none"> <li>• Direct impacts on soil or air within immediate work area and immediately cleaned up with no residual contamination.</li> </ul>	<ul style="list-style-type: none"> <li>• Injury or illness that requires no more than first aid treatment and no work restriction</li> </ul>	<ul style="list-style-type: none"> <li>• \$5-10k business impact</li> </ul>

## 7 APPENDIX C – PUBLIC NOTIFICATION PROCESS

### PURPOSE

This procedure focuses on the notification *requirements* to external stakeholders, in the event of a pollution incident as a result of operations at *Attunga* or Sulcor. External stakeholders include neighbouring industrial, residential or community premises and relevant authorities. This procedure forms part of site-specific Pollution Incident Response Management Plans and has been developed to meet compliance obligations under the Protection of the Environment Operations Act 1997.

### SCOPE

This procedure applies to *Attunga* and Sulcor site.

### REFERENCES

- ✓ Sulcor Pollution Incident Response Management Plan
  - Stakeholder Contact List
- ✓ *Attunga Pollution Incident Response Management Plan*
  - *Stakeholder Contact List*

### DEFINITIONS

- ✓ **Immediate notification:** *promptly and without delay, after the person becomes aware of the incident; as soon as it is safe to do so; and not as to delay immediate actions to ensure the safety of people or contain a pollution incident.*

### PROCEDURE

#### 1.1 Notify incident internally

All personnel shall immediately notify their Supervisor of all pollution incidents that occur on *Attunga* and Sulcor premises, or as a result of activities carried out by Graymont personnel or contractors.

The Supervisor shall immediately notify the Operations Manager of the pollution incident.

#### 1.2 Contact initial combat agency

The Operations Manager shall call '000' if the incident presents an immediate threat to human health or property, with the purpose of coordinating a response from Fire and Rescue NSW, the NSW Police or the NSW Ambulance Service, as required.

#### 1.3 Notify neighbouring premises of immediate threat

The Operations Manager shall provide early warnings to neighbouring premises by notifying them of any immediate threat to human health or property. Neighboring premises shall be notified with reference to the site plan and Stakeholder Contact List in the *Attunga* and Sulcor Pollution Incident Response Management Plan.

#### 1.4 Assess material harm to the environment

The Operations Manager shall immediately after being notified of the pollution incident, consult with the Environmental Advisor to assess whether the pollution incident has caused or threatens material harm to the environment.

In the event that the Environmental Advisor cannot be contacted, the Regional Manager shall consult with the relevant Environment or Health & Safety Manager.

If it is assessed that the pollution incident has caused or threatens material harm to the environment, the Operations Manager shall immediately notify the Regional Manager and the relevant Environment or Health & Safety Manager.

If it is assessed that the pollution incident has not caused or does not threaten material harm to the environment, the Operations Manager shall follow internal incident reporting procedures.

#### 1.5 Notify authorities

The Regional Manager shall, in consultation with the relevant Environment or Health & Safety Manager, immediately verbally notify all of the authorities in the table below, in order of priority. Authorities must be notified at this step regardless of whether they have been contacted earlier in the process (e.g. step 1.2).

The information to be provided to each Authority is detailed in the Pollution Incident Notification Form. All information listed in the Pollution Incident Notification Form must be communicated to each Authority. If information required in the Pollution Incident Notification Form is unknown at the time of the notification, it must be notified to the Authority immediately after it becomes known.

Details of each notification shall be recorded in the Pollution Incident Notification Form.

Priority	Authority	Contact number
1	Environment Protection Authority	131 555 or (02) 9995 5555
2	Ministry of Health via Tamworth Office Public Health Unit	Ph.: 02 6764 8000 (diverts to Public Health Officer on call)
3	Work Cover Authority	13 10 50
4	Tamworth Regional Council	1300 733 625 (24hrs)
5	Fire and Rescue NSW	1300 729 579

#### 1.6 Notify neighbouring premises

The Operations Manager shall notify the owners or occupiers of premises in the vicinity of the site who may be affected by the pollution incident. The Pollution Incident Notification Form may be used to guide the information to be included in the notification.

The neighbouring premises and their contact details are detailed in the site plan and Stakeholder Contact List in the *Attunga* and *Sulcor* Pollution Incident Response Management Plan.

#### 1.7 Update neighbouring premises

The Operations Manager shall update the owners or occupiers of premises in the vicinity of the site who may be affected by the pollution incident, as required. Updates may include the following:

- status of the incident response;
- status of the dispersion of the pollutant; and
- Recommended actions to minimise the risk of harm as a result of the pollution incident.

The neighbouring premises and their contact details are detailed in the site plan and Stakeholder Contact List in the [name of site] Pollution Incident Response Management Plan.

#### 1.8 Notify authorities in writing

The Operations Manager shall ensure that each Authority is notified in writing within seven days of the incident occurring. The information listed in the Pollution Incident Notification Form must be communicated to each Authority.

## DOCUMENTS REQUIRED

Pollution Incident Notification Form

## 8 APPENDIX D – STAKEHOLDER CONTACT LIST

Stakeholder	Contact Details
Paul McMahon (neighbour)	02 6769 5777
Richard Chaffey (neighbour)	02 6769 5845
Tamworth Council	1300 733 625 (24hr emergency service) 02 6767 5555
State Water	1300 662 077
State Emergency Service	13 25 00