

Pollution Incident Response Management Plan

**SEQ-TP-070** 

# **HASLIN**

## Pollution Incident Response Management Plan Eurobodalla Southern Water Supply Storage EPL 21767 SEQ-TP-070













# Pollution Incident Response Management Plan

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### 1. Scope & Purpose

This Pollution Incident Response Management Plan (PIRMP) has been prepared for the Eurobodalla Southern Water Supply Storage (ESWSS) Project (Project) and should be read in conjunction with the Project Construction Environmental Management Plan (CEMP) and the Emergency Response Plan SEQ-TP-037 (ERP). This plan has been prepared in accordance with Part 5.7A and Section 153C of the Protection of the Environment Operations Act 1997 (the POEO Act) and the Protection of the Environment Operation (General) Regulation 2022.

### 2. Objective

#### The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at
  the premises, the Environment Protection Authority (EPA), Public Works Authority
  (Principal's Authorised Person), Eurobodalla Shire Council (ESC) (the Client) and other
  relevant authorities specified in the POEO Act (such as NSW Health, SafeWork NSW, and
  Fire and Rescue NSW), and people outside the project who might be affected by the
  impacts of a pollution incident.
- Minimise and control the risk of a pollution incident associated with the construction of the project by requiring identification of risks and the development of planned actions to minimise and manage those risks.
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons
  responsible for implementing and ensuring that the plan is regularly tested for accuracy,
  currency and suitability.

For the purpose of this plan, a pollution incident is defined by the POEO Act as:

pollution means—

- (a) water pollution, or
- (b) air pollution, or
- (c) noise pollution, or
- (d) land pollution.

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 of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

This Plan also describes how materials shall be handled and stored on site in accordance with applicable Safety and Environmental Legislation.



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The scope of this management plan is to provide:

- Procedure for notifying pollution incidents to appropriate personnel, authorities, and regulatory bodies.
- Detailed description of the action to be undertaken immediately following a pollution incident by the licence holder to reduce or control any pollution.
- Procedures for co-ordinating any action taken in combating the pollution caused by the incident (with appropriate personnel, authorities, and regulatory bodies), and the communication pathways required.

This management plan applies to all project and contractor personnel working within the ESWSS project site.

While this plan specifically relates to pollution incidences and events, where applicable it is to be used in conjunction with the Emergency Response Plan SEQ-TP-037, and other relevant documents in the Eurobodalla Southern Water Supply Storage (ESWSS) Construction Environmental Management Plan (CEMP). The plans that identify potential hazards relevant to pollution include Soil and Water Management Plan, Waste Management Plan, Air Quality Management Plan and the Noise and Vibration Management Plan.

#### 3. Legal and Other Requirements

All activities carried out on site must comply with the following licences, legislation, regulations and guidelines relevant to environmental management, notification, and reporting of pollution.

- **Environmental Protection Licence 21767**
- Protection of the Environment Operations Act, 1997 (POEO Act)
- Protection of the Environment Operations (Waste) Regulation, 2005
- Protection of the Environment Legislation Amendment, 2014
- Environmentally Hazardous Chemicals Act, 1985 No 14 (NSW)
- Storage and Handling Dangerous Goods Code of Practice (Safe Work 2005)
- Storage of Flammable Liquids: Guidance Material (Safe Work 2020)
- Soils and Construction: Managing Urban Stormwater (Landcom 2004)
- Relevant Australia/New Zealand Standards

Material Safety Data Sheets applicable to materials stored on site

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Date Issued: 07/07/17



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### 4. Site Context and Layout

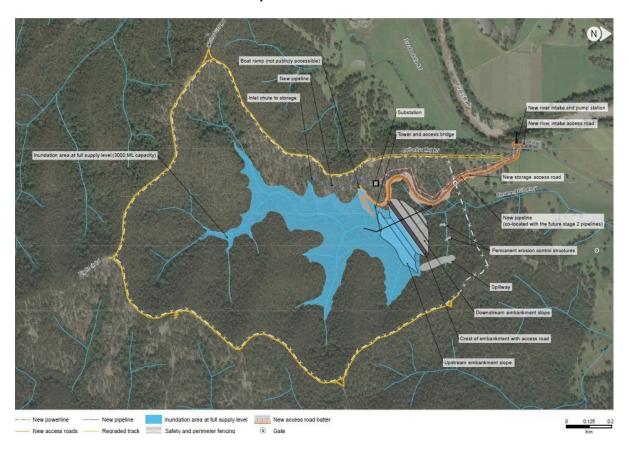


Figure 1 Eurobodalla Southern Water Supply Storage project overview

### 5. Hazard Identification and Pre-emptive measures

The management plans associated with the CEMP identify environmental aspects associated with the construction of the Project. The plans that identify potential hazards relevant to pollution include Soil and Water Management Plan, Waste Management Plan, Air Quality Plan and Noise and Vibration Management Plan. Table 1 lists the main potential hazards associated with the work activities and Table 2 provides a risk assessment of these hazards.



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#### Table 1 Hazard Identification

Aspect	Hazards		
Soil & Water	The Soil & Water Management Plan and ERP details hazards to soil and water. Hazards include:		
	Storage of fuel and chemicals		
	Refuelling		
	• Earthworks increasing the risk of erosion and sedimentation; and		
	Tree clearing, topsoil stripping and soil disturbance		
Waste	The Waste Management Plan details hazards associated with resources and waste. Hazards include:		
	Liquid waste		
	Liquid waste from human waste storage facilities (sewage).		
	Fuels, oils, greases		
	Hazardous wastes		
	General solid waste		
	Non-recyclable and other putrescible general solid waste.		
	Empty oil and other drums		
	Potentially contaminated soils		
	Waste water / Stormwater		
	<ul> <li>Spoil from quarrying activities</li> </ul>		
Air	The Air Quality Management Plan detail hazards associated with Air. Hazards include:		
	Air contamination (Dust)		
Noise and Vibration	The Noise and Vibration Management Plan details hazards associated with noise and vibration. Hazards include:		
	<ul> <li>Undertaking works outside approved construction hours</li> <li>Works exceeding noise management levels</li> <li>Work not in accordance with EPL 21767</li> <li>Vibration from project activities impacting surrounding built structures.</li> </ul>		



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Natural Disasters (Flood & Fire)  Refer to ERP Section 4
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#### Table 2 Risk Assessment

Hazard	Inherited Risk Level	Pre-Emptive Actions*	Residue Risk Level
Sediment laden water leaving site including mud tracked onto roadways	D	<ul> <li>Vehicle wash out/shaker grid</li> <li>Hard stand at site entry/exit</li> <li>Procedures for dewatering</li> <li>Sediment basins</li> <li>Progress earthworks in conjunction with establishment of Progressive ERSED controls</li> </ul>	E
Pollution of land or water (stormwater) from hydrocarbon/chemical spills from plant or refuelling/fuel storage	D	<ul> <li>Plant hazard assessment conducted</li> <li>Daily plant checklists</li> <li>Bunded controls when refuelling on-site</li> <li>Refuelling and storage of chemicals minimum 40m from natural creeklines</li> <li>SEP identifying spill kit locations</li> </ul>	E
Pollution of land or water from chemical and hazardous waste, contaminated soil, concrete waste	D -	<ul> <li>Identify storage locations on SEP</li> <li>Establish waste material management process</li> <li>Establish concrete waste area and concrete washout, show location on SEP</li> </ul>	E



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Generation of dust from mobile plant/vehicles and exposed areas	С	<ul> <li>Speed restrictions on traffic movements on site</li> <li>Dust suppression (e.g. water carts and stabilisers)</li> <li>Trucks to cover loads</li> </ul>	D
Impacts to local receivers due to noise and vibration	С	<ul> <li>Comply to approved construction hours and out of hours work permits</li> <li>Communicate with the local community on out of hours works and general project activity updates/notifications</li> <li>Program high noise activities for standard construction hours and apply respite periods as required</li> </ul>	D

Note – This is not an exhaustive list of pre-emptive actions. For further information refer to relevant Environmental Management Plan.

	CONSEQUENCE					
	RATING	1	2	3	4	5
	ALMOST CERTAIN	D	С	В	A	Α
_	LIKELY	D	D	С	В	A
LIKELIHOOD	POSSIBLE	E	D	С	С	В
Ž	UNLIKELY	E	E	D	С	В
	RARE/ REMOTE	E	E	D	D	С



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### Table 3 Likelihood Rating

Rating	Criteria
Almost Certain	99% probability, or
,	Expected to occur in most circumstances, or
	Could occur within "days to weeks", or
	Will occur repeatedly without corrective action being taken
Likely	50-99% probability, or
	Will probably occur in most circumstances, or
	Could occur within "weeks to months"
Possible	20-50% probability, or
	Might occur sometime, or
	Could occur within "months to years"
Unlikely	1-20% probability, or
	Could occur but would not be expected, or
	Could occur in " years to decades"
Rare	<1% probability, or
	Occurrence requires exceptional circumstances, or Only occur as a "100 year event"



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Residual Risk / Opp.		Timing of Status Report and Management Plans	
	Take action to eliminate or implement additional controls to reduce it to acceptable level (ALARP / SFAIRP).	Notify as soon as practicable, normally with 24 hours.	Haslin Constructions Head Office (CEO)
A	"WHS / Environmental risks" the task or activity must not be performed. An alternative solution must be found.	Manage and re-evaluate risk / opportunity to allow Project reporting monthly  Notify Haslin Constructions Head Office	
	Implement additional controls to reduce it to ALARP/SFAIRP.	Notify as soon as practicable, normally within 72 hours.	
В	"WHS / Environmental risks - The activity or task must not be performed without the explicit concurrence of the Senior Project Manager.	Manage and re-evaluate risk / opportunity to allow Project_reporting monthly  Notify Haslin Constructions Head Office	Haslin Constructions General Manager
С	Implement additional controls reduce it to ALARP/SFAIRP where it is cost-effective to do so.  "Onsite activities" – must not	Manage and re-evaluate risk / opportunity to allow Project reporting monthly	Haslin Constructions Senior Project Manager



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	commence without Site Management review		
D		Manage and re-evaluate risk / opportunity to allow Project reporting monthly	Haslin Constructions Senior Project Engineer / Environmental Advisor
_		Monitor, manage and carryout activity in accordance with identified controls	Haslin Constructions Site Supervisor



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### 6. Inventory of Pollutants

The Project Safety Management Plan (PSMP) requires that a Safety Data Sheet (SDS) and a Hazardous and Dangerous Substances Register be kept at all chemical storage handling locations and which will provide an inventory of the pollutants on site. The location of pollutants to be stored/held on site shall be identified in the relevant SEPs per work activity, including storage methods.

### 7. Maps

A set of maps showing the location of the premises, the surrounding areas that are likely to be affected by a pollution incident, the location of potential pollutants on the premises, the location of any stormwater drains on the premises, and the discharge locations of the stormwater drains to the nearest watercourse of water body will be developed within the CEMP and associated Sub-Plans and SEPs.

### 8. Notification

For pollution incidents associated with the Project the Pollution Incident Response Management Plan shall be initiated in accordance with Section 10 of this Plan. Local community stakeholders that may be potentially affected by a pollution incident will be notified. Communications and engagement activities, tools, enquiries and complaints mechanisms to notify the community with will be set out in the Project Community and Stakeholder Engagement Plan.



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### 9. Incident Response Contact Details

#### Table 4 Haslin Site Staff

Name:	Position:	Contact Number:	Email:
Justin McCarthy	Project Manager	0407 409 215	jmccarthy@haslin.com.au
Paul Masters	General Superintendent	0421 567 320	pmasters@haslin.com.au
Karen McCann	Environmental Advisor	0400 126 880	kmccann@haslin.com.au

#### Table 5 - Authorities

Name:	Location:	Contact Number:
NSW EPA (Environment Line)		131 555
Department of Health	Batemans Bay (Health Service)	02 4475 1500
SafeWork NSW	Wollongong	13 10 50 (24/7) / 02 4222 7333
Fire & Rescue		000
Local Authority - Eurobodalla Shire Council (ESC)	Moruya	02 4474 1000

#### Table 6 - Sensitive Receivers

Name:	Address:	Contact Number:
Peter Lavis	758 Eurobodalla Road EUROBODALLA NSW 2545	0487 356 495
Joseph Moore	198 Waincourt Road EUROBODALLA NSW 2545	0467 959 252
Neil and Janet Morrison	168 Waincourt Road EUROBODALLA NSW 2545	0427 767 227 neil@instepmanagement.com.au paulinegsonnet@gmail.com
Leonard Collis and Pauline Sonnet	PO Box 176 BODALLA NSW 2545	02 4473 5424 0407 044 416
Hans and Jennifer Brosch	818-820 Eurobodalla Road EUROBODALLA NSW 2545	02 4473 5496 0400 735 454 jennyrose@antmail.com.au
Margaret Smith	97 Waincourt Road EUROBODALLA NSW 2545	02 4473 5329 (H)
Gregory and Leslie Murphy	93 Waincourt Road EUROBODALLA NSW 2545	0408 735 371 euroma@skymesh.com.au
Peter Motbey	51-53 Nerrigundah Mountain Road EUROBODALLA NSW 2545	02 4473 5083 tyrone1@activ8.net.au
Troy & Shellee Hollis	350 Comerang Forest Road BODALLA NSW 2545	troy.hollis@bigpond.com





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Melissa & Nicholas Clancy	INSW 7545	0428 429 092 info@southernturfsupplies.com.au
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### 10. Pollution Incident Response Procedure

#### Pollution incident occurs

Prevent any further release of pollutant ASAP

#### **ESWSS Incident Response Contacts:**

Justin McCarthy - Project Manager 0407 409 215 Paul Masters - General Superintendent 0421 567 320 Karen McCann - Environmental Advisor 0400 126 880

Project Manager / General Superintendent to determine scale of incident in consultation with Env. Advisor ASAP & initiate incident response procedure

Record pollution incident details on Environmental Incident Report Checklist:

- Emission type (air, water, land)
- Pollution type (fuel, gas, sediment, oil etc.)
- Time/duration/volume/location of release
  - Action taken or proposed action
  - Any other relevant information

#### Scale: Minor / Trivial

Minor remediation required and is reversible:

<\$10,000 remediation cost

#### Scale:

#### **Moderate/Short Term Effect**

Actual or potential harm that is not trivial: >\$10,000 - 100,000 remediation cost

#### Scale:

#### Major/Medium to Long Term Effect

Significant remediation required: >\$100,000 remediation cost

#### Not a reportable pollution incident under POEO Act

Remediate as per applicable procedure / management plan

#### Reportable pollution incident under POEO Act

Report incident immediately to authorities:

**EPA Environment Line** 131 555 Department of Health 02 4475 1500

Safe Work NSW 13 10 50 (24/7) / 02 4222 7333

Eurobodalla Shire Council 02 4474 1000 Fire & Rescue Pollution Hotline 1300 729 579

If pollution incident is likely to directly affect the community, contact all relevant sensitive receivers

#### Remediate pollution as per advice from Authorities and **Environmental Advisor**

Monitor & document status of clean up actions, report back to authorities as required



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### 11. Training

All staff, visitors and contractors coming on to site will be briefed on their responsibilities under this plan.

The incident response and action flow chart (Section 10) will be made available as a notice posted at appropriate locations around the site office and crib sheds.

Several forms of environmental training will be provided. Examples include:

- A project site induction, including environmental roles and responsibilities
- Toolbox talks
- Environmental Work Method Statements, and
- Environmental awareness training for specific issues.

The Project Environmental Advisor will undertake training and maintain a register of all project site inductions and environmental training carried out.

### 12. Testing & Review

The testing of this plan shall be carried out in such a manner as to ensure that the information included in this plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner. Any such test is to be carried out:

- Routinely at least once every 12 months, and
- Within 1 month of any pollution incident occurring in the course of an activity to which
  the license relates so as to assess, in the light of that 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.

In accordance with the Regulation, testing of this PIRMP will occur:

- Initially within three months after EPL 21767 approval;
- Every 12 months thereafter, while construction continues, and
- Within 1 month of any Category One pollution incident during the construction of the Project.

Testing of the PIRMP will involve:

- Desktop simulation: or
- Practical exercise or drill

Records will be kept in accordance with the CEMP





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### 13. Pollution Incident Response - Spill / Releases

**Note** – Response personnel are to ensure the safety of self and others prior to or when carrying out spill / release recovery.

#### **Actions during the Emergency**

#### (a) Person/s Encountering the Spill or Release

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#### (b) Chief Warden

The spill/release should be contained as soon as possible, using appropriate absorbents (booms, absorbent granules, pads) if it is believed safe to do so, based on information at hand. Particular attention should be paid to drains / water courses and these may need to be dammed using appropriate bunding.

#### (c) Person/s Responsible for Spill/Release Clean Up

The person responsible for the substance should manage the spill/release as specified on the Safety Data Sheet (SDS) or by the manufacturer/supplier of the substance. On arrival at the scene, if the spill/release is significantly large, adversely uncontained or in any other way deemed unsafe ensure that the affected area has been evacuated. Additional actions will include:

- Prevent unauthorised access to the area
- Consideration should be given to site environmental conditions and a decision made as to whether further evacuation of the area is required
- Ensure that persons assemble in a well-ventilated, safe area, upwind from the spill/release Considerations, instructions and advice relating to specific spill types must be followed for the safety of colleagues, other persons and the environment.

#### Important - Notifying Fire Brigade

- The Fire Brigade HAZMAT Team is to be notified immediately for any hazardous substance spill beyond our control. This call should be made via '000'.
- The Fire Brigade should also be informed via a '000' call if the spillage has caused evacuation, entered drainage systems or is a size or nature that Site personnel have insufficient resources or training to safely and effectively manage.
- All information regarding the spill should be reported to the Officer-In-Charge of the Fire Brigade on arrival at scene

#### Oil and Grease Considerations:

- Stop the leak at the source
- Determine the type and size of the spill
- Protect storm water drains by forming barriers or blocking them
- Prevent any runoff into storm water drainage lines use the containment booms, located in the spill prevention kits, or earthen bunds to confine small spillages (up to 200L).
- Spills that cause or potentially threaten material harm must be notified to the relevant authorities
- Wear personnel protective equipment (PPE) located in the spill prevention kits to prevent skin and eye contamination and to avoid breathing any vapor. PPE includes overalls,



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splash apron, eye goggles, gloves (PVC or neoprene), footwear, and appropriate breathing apparatus.

- Clean up method will be dictated by the quantity spilled
- Emergency (Teflon pneumatic) pump for pumping out drains and holding pits. Spilled material must be pumped into approved (degassed), sealed, and labelled 200L steel drums
- Cleaning equipment (mops, squeegees etc.) for directing liquid spills into bund or holding pits
- Spill response kits for absorbing minor spills
- Ensure that the spill area has been appropriately cleaned and is no longer a hazard.

#### **Turbid / Sediment Laden Water:**

- Inform Supervisor of problem, / exact location and the estimated volume magnitude
- If uncontrollable, notify Project Environment Advisor
- Divert flow away from existing waterways
- Create barriers and block any storm water drains
- Contain the spill by forming a barrier around the affected area. Establish emergency berm
- (earth or sandbags) to contain trap storm water/sediment laden water or reduce flow. Where possible turbid/sediment laden divert dirty water to suitably sized operational sediment control point or basin device.
- Work on the source control / restoration of original control device e.g. tank, embankment.
- Assess impact and devise remedial action for affected waterway and embankment
- Apply buffering solutions/agents or pump out if necessary
- Remove sediment build-up deposit

#### Powder and Dust Release Considerations:

- Identify any outside area, where the powder could be dispersed to the environment.
- Wear personnel protective equipment, located in the spill prevention kits, to prevent skin and eye contamination. i.e. overalls, splash apron, eye goggles, gloves and rubber boots
- Wear a breathing mask or face mask to prevent inhalation of the powder.
- PREVENT ANY EMMISSION TO THE ENVIRONMENT. Where possible close doors and windows in the vicinity of the spill. If a large amount of powder is spilled in an external area, organise cover sheets to be placed over the spill to prevent dispersion from wind etc. during the cleanup time.
- Collect all of the material, by using one of the following methods:
- Vacuum Cleaner (check that the material is not explosive under pressure)
- Bulk tanker removal (vacuum pump)
- Emergency (Teflon pneumatic) pump
- Cleaning equipment (mops, squeegee, buckets, etc.)
- All materials must be contained in appropriate, sealed and labeled containers
- Flush the remaining residue with copious amounts of water
- Contact the Project Environment Advisor, who will be responsible for the correct disposal of all containers according to the corresponding waste disposal procedures
- All materials used in the cleanup of hazardous powder materials (e.g. vacuum filters, mop heads, tarpaulins, etc.) shall be considered contaminated with the hazardous substance(s)



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and must be managed as hazardous wastes unless deemed otherwise by the environmental team.

#### CAUTION

- SLIP HAZARDS AVOID SPILL ZONE & STOP AREA ACCESS / TRAFFIC FLOW
- TOXIC VAPOURS MAXIMISE VENTILATION & WEAR BREATHING APPARATUS
- FIRE HAZARDS ELIMINATE IGNITION SOURCES & HAVE FIRE EXTINGUISHER READY

#### **Dangerous Goods**

#### **CAUTION**

- IDENTIFY THE CLASS OF DANGEROUS GOOD (AS DESCRIBED BELOW) AND THE INHERENT DANGEROUS PHYSICAL PROPERTY OF THAT CLAS (SEE PRODUCT SDS)
- CONTROL THE IDENTIFIED DANGER OR ANYTHING THAT MIGHT INCREASE THE EXPOSURE TO THAT DANGER
- RESPOND TO THE SPILL AS PER ACTION STEPS OUTLINED FOR THE "PERSON ENCOUNTERING THE SPILL/RELEASE" AT THE START OF THIS SECTION

#### Compressed Gases (Class 2)

Flammable Compressed Gases (Class 2.1) – May be ignited by heat, sparks or flames. Vapors may travel to a source of ignition and flash back to cylinder. Gases present a vapor explosion hazard indoors, outdoors, and in sewers. Vapors may cause dizziness or suffocation. Contact of gas on skin will cause severe frostbite. Fire may produce irritating or poisonous gases.

Non-Flammable, Non-Toxic Compressed Gases (Class 2.2) - Cylinders may explode in a fire.

Vapours may cause dizziness or suffocation. Contact of gas on skin will cause severe frostbite.

- Verify the leak source and identify the type of gas leaking
- Eliminate any hazards such as incompatible substances or ignition sources
- Take precautions including the alerting of others in the area and isolating the situation
- Ensure appropriate personal protective equipment is utilised, this includes positive pressure self- contained breathing apparatus and thermal gloves
- Control the leak and extinguish any fires.



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#### Flammables (Class 3)

- Eliminate all sources of ignition
- Prevent any runoff into stormwater drains use the containment blocks (booms), located in the Hazchem spill kits, to confine the spillage
- Wear personal protective equipment (i.e. overalls, splash apron, eye goggles, gloves, rubber boots), located in the spill prevention kits, to prevent skin and eye contamination
- Identify any fire risk
- Ensure ventilation systems are in full operation (adjust to suit where possible) and remain operational until such time as the hazardous atmosphere dissipates.

#### Oxidizing Substances; Organic Peroxides (Class 5)

- Class 5 substances will generate large amounts of oxygen when exposed to heat, metals and many chemicals. High concentrations of oxygen can result in the initiation of severe fires in any combustible material.
- All Class 5 substances shall be kept separate from other dangerous goods classes and any combustible material by at least 5 metres in a well-ventilated area, or in an approved Class 5 storage cabinet.

#### Toxic and Infectious Substances (Class 6)

- All class 6 poisons shall be stored in areas complying with the Dangerous Goods Regulations
- Class 6 goods shall be kept at least 5 metres away from foodstuffs and dangerous goods of other cases, or alternatively be separated by a liquid tight wall.



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#### **Corrosive Substances (Class 8)**

Neutralise using soda ash - NEVER add water to corrosive substances

**Hypochlorite Solution and Peroxide Acids** - use glass or plastic equipment for storage for disposal. Avoid use of all metals

**Ammonia** - volatile, containers can develop pressure with an increase in temperature. Do not store near heat. Exercise extreme care when opening containers as they may be pressurised

Ammonia, Hydrochloric Acid, Acid Phosphoric, Acid Thioglycolic and Acid Sulphuric 98% - use full face respirator with appropriate approved canister.

- Prevent any runoff into stormwater drains use the containment blocks (booms), located in the Hazchem spill kits, to confine the spillage.
- Wear personnel protective equipment (i.e. overalls, splash apron, eye goggles, gloves, rubber boots and appropriate protective full-face respirator), located in the spill prevention kits, to prevent skin and eye contamination.

#### (d) Actions following the Spill / Release Pollution Incident

#### Person/s Responsible for the Spill / Release Clean Up

- All waste should be removed consistent with regulatory requirements and local waste disposal procedures.
- Complete an Incident Notification and Investigation Report form through the Procore system. Complete any client incident notification reports.

#### **Internal Notifications:**

- Notify senior management in line with ERP
- Notify Haslin Regional HSEQ

#### **External Notifications:**

- EPA if a pollution incident causes or threatens material harm to the environment, including a spill, leak or escape of a substance.
- All other external authorities as required in line with Table 5 of this PIRMP.