

# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

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## 1. INTRODUCTION / PURPOSE

The objectives of these plans are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

## 2. PROCEDURE REQUIREMENTS AND GUIDELINES

### PREAMBLE

The required content of a Pollution Incident Response Management Plan (PIRMP) is described in the Protection of the Environment Operations (General) Regulation 2009. This Moly-Cop PIRMP document structure is closely aligned with the Regulation and for simplicity contains references eg **[clause 98C(1)(c)]** to the part of the Regulation to which each section applies. In the following discussion, use of the term 'section' refers to provisions in the POEO Act and 'clause' to provisions of the POEO(G) Regulation.

This procedure is activated by being referenced in the sites "Emergency FlipCharts" which are the primary reference material available onsite in hard copy in the event of an emergency situation. The Flipcharts are available at each site departments noticeboards. The FlipCharts detail the escalation to Management of emergency situations. Management are then responsible for activating the appropriate communication to the community and notification to Authorities.

*"The definition of a pollution incident is:*

*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.*

*A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:*

*(a) harm to the environment is material if:*

*(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."*

*– Protection of the Environment Operations Act.*

### **3. DESCRIPTION AND LIKELIHOOD OF HAZARDS AND PRE-EMPTIVE ACTIONS TO BE TAKEN**

**[clause 98C (1)(a) and (b) and clause 98C(1)(c)]**

The Moly-Cop Waratah site undertakes its Scheduled Activities under EPA Licence 822. (Registered business name Commonwealth Steel Company Pty Ltd). The site maintains an Environmental Management system in compliance with the ISO-14001 standard and as such documents its environmental hazards.

For purposes of clarity it is not intended to represent all of the sites environmental hazards in this PIRMP, but rather list the hazards (or types of hazards) which pose a level of threat to the environmental or human health commensurate with the intention of Part 5.7A of the POEOA.

The following pages detail the risk ranking methodology used in ranking the site hazards and a table defining the types of hazards on site, the controls, and the potential route for impacting on the environment or human health. Note that since all site hazards have some form of control mechanism in place, the likelihood and severity rating have incorporated the effectiveness of those controls.

#### 4. RISK RANKING METHODOLOGY

Risk Ranking is performed by choosing the applicable LIKELIHOOD and CONSEQUENCE from the following two tables then aligning these on the Risk Rankin Matrix to arrive at a Risk Score

**Table 1: Likelihood**

LIKELIHOOD	
Rating	Description
<b>Almost Certain</b>	The event is expected to occur in most circumstances. Almost expect it to happen.
<b>Likely</b>	The event will probably occur in most circumstances. Not surprised if it happens.
<b>Possible</b>	The event might occur at some time. Would not be surprised either way whether it happens or not.
<b>Unlikely</b>	The event could occur at some time Surprised if it happens.
<b>Rare</b>	The event may occur only in exceptional circumstances. May happen, but it would be a shock.

**Table 2 : Consequence**

CONSEQUENCE		Negligible Level 1	Minor Level 2	Medium Level 3	Major Level 4	Extreme Level 5
<b>Environmental Effects</b>		No lasting effect. Low-level impacts on biological or physical environment. Limited damage to minimal area of low significance.	Minor effects on biological or physical environment. Minor short-medium term damage to small area of limited significance.	Moderate effects on biological or physical environment but not affecting ecosystem function. Moderate short-medium term widespread impacts (e.g. oil spill causing impacts on shoreline).	Serious environmental effects with some impairment of ecosystem function (e.g. displacement of a species). Relatively widespread medium-long term impacts.	Very serious environmental effects with impairment of ecosystem function. Long term, widespread effects on significant environment (e.g. unique habitat, National Park).

**Table 3: Risk Ranking Matrix**

RISK RANKING MATRIX			Consequence				
			1	2	3	4	5
			Negligible	Minor	Medium	Major	Extreme
<b>Likelihood</b>	<b>Amost Certain</b>	5	High	High	Very High	Very High	Very High
	<b>Likely</b>	4	Moderate	High	High	Very High	Very High
	<b>Possible</b>	3	Low	Moderate	High	Very High	Very High
	<b>Unlikely</b>	2	Low	Low	Moderate	High	Very High
	<b>Rare</b>	1	Low	Low	Moderate	High	High

HAZARD TABLES

	Hazard type	Nature of pre-emptive controls	Mode of potential impact	Impact	Emergency Response equipment	Circumstances which may increase the potential of environmental or health impact	Likelihood	Consequence	Risk Score	Zone Affected (see Map section 2.8)
1	Use and storage of Oils (mineral, vegetable, synthetic,)	<ul style="list-style-type: none"> <li>- Bulk volumes stored in bunded areas.</li> <li>- Oil retention weirs and oil skimmers at the 2 EPA Licenced stormwater discharge points.</li> <li>- Daily stormwater discharge point inspections.</li> <li>- Site incident reporting policy</li> <li>- Spill response kits on site</li> <li>- weekly stormwater quality tests</li> </ul>	Spillage to stormwater system.	Degradation of aquatic environment if pollutant enters downstream waters.	<ul style="list-style-type: none"> <li>Spill response kits</li> <li>Vacuum truck for sucking up pollutants from drains or ground.</li> <li>Sand and front end loader for large spills</li> <li>Operation of oil skimmers at stormwater discharge point.</li> </ul>	<p>Rainfall, and the subsequent increased stormwater flow rate, would reduce the ability of the stormwater settlement pond and oil retention weirs to retain oils.</p> <p>(only very heavy rain would have significant effect)</p>	Possible	Negligible	<b>Low</b>	5
2	Use and storage of water soluble; oils, synthetic coolants, and water treatment chemicals	<ul style="list-style-type: none"> <li>- Bulk volumes stored in bunded areas.</li> <li>- storage capacity at the 2 EPA Licenced stormwater discharge points allows the possibility of the retention of spilled soluble pollutants.</li> <li>- Daily discharge point inspections.</li> <li>- Incident reporting policy</li> <li>-weekly stormwater quality tests</li> </ul>	Spillage to stormwater system.	Degradation of aquatic environment if pollutant enters downstream waters.	<ul style="list-style-type: none"> <li>Spill response kits</li> <li>Vacuum truck for sucking up pollutants from drains or ground.</li> <li>Sand and front end loader for large spills</li> <li>Ability to isolate stormwater settlement pond at discharge point 2.</li> </ul>	<p>Rainfall, and the subsequent increased stormwater flow rate would reduce the residence time that soluble pollutants will remain within the settlement pond before leaving the site and entering downstream waters.</p>	Possible	Minor	<b>Moderate</b>	5

3	Use and storage of paints, thinners	Only small volumes kept and these are stored in purpose built Flammable goods lockers.	Spillage to stormwater system.	Degradation of aquatic environment if pollutant enters downstream waters.	Spill response kits Vacuum truck for sucking up pollutants from drains or ground. Sand and front end loader for large spills Ability to isolate stormwater settlement pond at discharge point 2.	Rainfall, and the subsequent increased stormwater flow reduces the ability of the settlement pond and oil retention weirs to retain oils.  (only very heavy rain would have significant effect)	Possible	Negligible	<b>Low</b>	5
4	Use and storage of diesel fuel	Bulk volumes kept in bunded areas.  Mobile equipment using diesel fuel are maintained to road registered standards or for non registrable vehicles are subject to regular maintenance and safety checks to manufacturers instructions.	Spillage to stormwater system.	Degradation of aquatic environment if pollutant enters downstream waters.	Spill response kits Vacuum truck for sucking up pollutants from drains or ground. Sand and front end loader for large spills Ability to isolate stormwater settlement pond at discharge point 2	Rainfall, and the subsequent increased stormwater flow reduces the ability of the settlement pond and oil retention weirs to retain oils.  (only very heavy rain would have significant effect)	Possible	Minor	<b>Moderate</b>	5
5	Melting of scrap steel and processing of molten steel	-Fume emissions collected by suction ducts to fabric filter prior to discharge to atmosphere.  -Sealed furnace enclosure.  -Emission alarms on discharge stacks	Metallic fume emitted to atmosphere if fabric filter fails or molten metal spilled in areas not controlled by sealed enclosure.	Degradation of local air quality. Metallic fume/dust fallout on community.	It is anticipated that the concentration of fallout from such an event would be so low as to be virtually undetectable on nearby property and response would be unnecessary. However, in an extreme circumstance, clean-up may be limited to hosing down of any badly affected property (homes/cars) and using absorbent spill response booms to filter contaminated water before runoff water enters stormwater drains.	Strong winds would increase the area of fume fallout, though this would also dilute any pollutant concentration.	Unlikely	Minor	<b>Low</b>	3
6	Operation of gas-fired steel reheat furnaces	All gas furnaces fitted with flame failure detection and approved by the appropriate regulatory authority.	Explosion. Emissions from incorrect fuel ratios. Gas Leak	Degradation of air quality in immediate area. Odour detected.	Shutdown procedures and valving exist to easily isolate source of problem.	Fire may force the isolation of valving further from the problem source. See isolation procedure.	Rare	Minor	<b>Low</b>	2
7	Natural Gas pipework (large	Site maintenance to maintain	Leak of natural gas to	Flammable gas causing fire or	Gas main Isolation procedure included in emergency plan	A large leak at the gas main inlet to the site	Unlikely	Minor	<b>Low</b>	2

	diameter mains supply)	pipework condition.	atmosphere.	explosion hazard near to leak source.	flipchart.	may prevent access to the main isolation valves at that point. In this case, we would contact the gas provider to isolate upstream from the site.				
8	Operation of 2 x 5MW water tube Boilers	Boilers maintained, operated, and inspected in accordance with regulatory standards.	Release and sudden expansion of steam from failure of boiler or steam accumulator.	Degradation of Air quality due to dust or particulate disturbance. Disturbance of neighbourhood amenity due to noise.	Varies according to specific hazard. Boiler failure may trigger other events referenced in this table.	Varies according to specific hazard. Boiler failure may trigger other events referenced in this table.	Rare	Medium	<b>Moderate</b>	1
9	Storage of pressurised liquefied gases (oxygen, nitrogen, argon)	Pressure vessels maintained and regularly inspected to regulatory standards. Vessels protected from vehicular collision.	Leak of gases to atmosphere.	Displacement of air locally.	Isolation of leak source by valving. Gases will dissipate quickly.	Large leaks and still wind conditions may increase dissipation times. It is not thought this could adversely impact the community.	Rare	Minor	<b>Low</b>	2
10	Possession of a small licensed radio-active source for liquid level detection in molten steel application.	Radio-active source stored and used by trained persons in accordance with the regulatory requirements. (Cobalt 60, Caesium 137). Source is extremely weak and would require more than passing exposure before annual recommended dose exceeded.	Loss of source and subsequent community interaction.	Small chance of health impact to an individual	Emergency procedure exists covering the loss or damage to the radiation source.  Radiation detection of sites main vehicular access gate to alert of radioactive source passing through.	The radioactive source is extremely weak and accidental short term exposure unlikely to exceed safe limits to humans.	Rare	Medium	<b>Moderate</b>	varies
11	Combustible/flammable materials (including those already listed in this table)	Flammables stored in correct cabinet types and inspected regularly. Bulk oils stored in banded areas to limit spread of leakage in event of fire. Fire alarms in some areas. 24hr manned operation in most areas. Extinguishers and fire alarms inspected in accordance with regulatory standards	Fire	Degradation of local air quality. Smoke affecting visibility.	Fire extinguishers available throughout site.  Larger fires dealt with by contacting external emergency services.	Fire could be made worse by interaction with other site hazards listed in this table (eg oxygen or natural gas).  No toxics on site in sufficient quantity to cause significant environmental or health impact.	Possible	Minor	<b>Moderate</b>	4
12	Chemically treated recirculated water systems containing	Recirc water held within maintained pipework and	Spillage to stormwater system.	Degradation of aquatic environment if	Vacuum truck for sucking up pollutants from drains or ground.	Rainfall, and the subsequent increased stormwater flow	Possible	Minor	<b>Moderate</b>	5

	<p>low levels of biocides and corrosion control chemicals.</p>	<p>tankages. Chronic leaks found by monitoring make-up water consumption. Emergency leaks result in system shutdown.</p>		<p>pollutant enters downstream waters.</p>	<p>Sand and front end loader for large spills</p> <p>Stormwater discharge points have large settlement ponds which would allow the capture and vacuuming of treated water into tanker.</p>	<p>reduces the residence time in the stormwater settlement ponds. This would reduce the available time to capture a spillage before it left site.</p>				
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## 5. INVENTORY OF POLLUTANTS

### [clause 98C(1)(d) and (e)]

The inventory of materials with the potential to pollute is described in the sites Dangerous Goods Register. A copy (including site map) is kept in hard copy at the sites East Gatehouse and electronically on the sites intranet (see waratah / Environment / Dangerous Goods /) A folder containing site maps exists, and for each year, a folder containing the sites DG manifest is kept.

## 6. SAFETY EQUIPMENT

### [clause 98C(1)(f)]

“Safety Equipment”, for the purposes of this Plan refers to information or equipment used to protect persons or the environment in the case of a pollution event. The following equipment and location listed below.

ITEM	LOCATION
Personnel safety equipment (first aid kits, safety showers, eye wash stations, defibrillators)	Various. Locations posted on departmental notice boards.
Liquid Spill Kits	Spill kit locations signed throughout site. Spill kit location maps on intranet under waratah home page / Environment / Registers / Spill Kits
Spill kit restocking materials	Main Store. (access key at Watchman’s Office out of normal hours)
Vacuum truck	Mobile equipment. See Emergency Flipchart on site noticeboards for contact details.
Road Sweeper	Mobile equipment. See Emergency Flipchart on site noticeboards for contact details.
Gas Monitors	Located in some maintenance offices and the Engineering office.
Fire Extinguishers	Located throughout the site with signage. Location maps on intranet under waratah home page / environment / fire extinguishers and hose reels inspections / extinguishers / extinguisher location drawings (drawings 20-4-37 to 20-4-50)
Hose reels and Hydrants	Located throughout the site with signage. Location maps on intranet under waratah home page / environment / fire extinguishers and hose reels inspections / Hose reels / hose reel and hydrant locations (drawings 20-4-24 and 20-4-32)
External Emergency Services	Contactable via Watchman’s Office (dial 22 by internal phones or 49740 222 from mobiles).

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## 7. CONTACT DETAILS

### [clause 98C(1)(g) and (h)]

Contact Details for persons involved in emergency response notification and support are included in the sites Emergency Response Flipcharts located in each department.

## 8. MINIMISING HARM TO PERSONS ON THE PREMISES

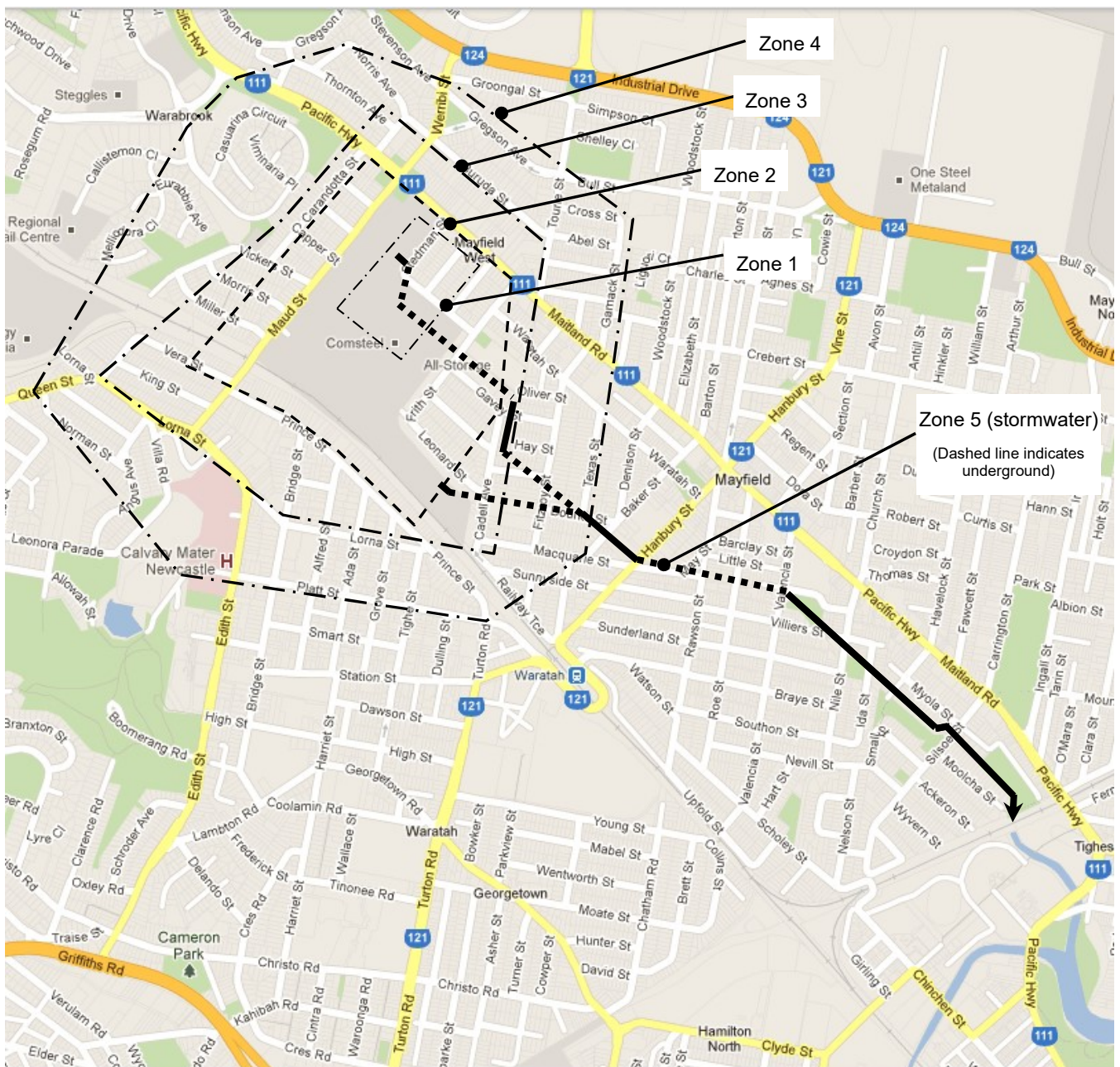
### [clause 98C(1)(j)]

Harm minimisation to persons is achieved through the sites various emergency procedures (see Emergency Flipchart) and specifically through the Evacuation Procedure in the flipchart which details evacuation to pre-determined safe muster points. See section 2.9.

## 9. MAPS

### [clause 98C(1)(k)]

The map below shows the approximate areas that could be affected by a pollution incident of each anticipated type. See tables at Section 2.2 for reference.



## 10. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

[clause 98C(1)(I)]

Procedures for reacting to a pollution incident are contained in the sites Emergency response Flipcharts located on noticeboards throughout the site. The flipcharts include summaries of, and links to, procedures related to the following emergency response subject matter:

- Evacuation points
- Evacuation procedure
- Personnel at the scene
- Are warden

- Shift Supervisor (Incident Controller)
- Fire / Explosion emergency
- Fall from heights / suspended person
- Terrorism
- First Aid / Medical Emergency
- Major equipment failure
- Spill Control
- Natural Disaster / Structural collapse
- Bomb Threat and Checklist
- Threat of physical attack or harm
- Molten Material Spill
- Noise
- Air Pollution
- LPG/Natural Gas Leak or Fire
- Emergency Contact Numbers
- Incident reporting expectations.

Note: Incidents that have or could potentially cause material harm to the environment are notifiable under legislation to the Authorities. Community notification may also be required. See sections 2.12 and 2.13 for guidance.

## **11. STAFF TRAINING**

**[clause 98C(1)(m)]**

Fire awareness and emergency evacuation training is a requirement for all employees. Key personnel are trained in a procedure to combat Natural Gas Leaks and Fires, and Fire Wardens are nominated to co-ordinate response to such emergencies.

All employees are trained in the presence of the sites noticeboards and inclusion of the Emergency Flip Chart. The Flip Chart has been designed to be a simple guide, easily understood without prior training, and able to be followed quickly without the hindrance of verbosity.

The requirement to notify authorities or community members in the event of an emergency situation will be undertaken by the sites upper management when the event is escalated to that level as per the requirements of the FlipChart Emergency Plan. Management are trained in this requirement.

## **12. TESTING PLANS**

**[clauses 98C(1)(n),(o) and (p), 98C(2)(f) and (g), 98E(1) and 98E(2)]**

Site departments undertake an Emergency Evacuation Trial, and also perform an emergency response trial (varying scenarios) and an annual basis. All procedures are reviewed for suitability each 2 years. Records are kept of all trials.

### 13. NOTIFICATION TO AUTHORITIES

Pollution Incidents that have, or that could potentially, cause 'material harm' to the environment must be reported to the Authorities. Note that odour, in the absence of other signs, could be the only indicator of potential environmental harm (eg odour from a spill, when the spill itself is not visible)

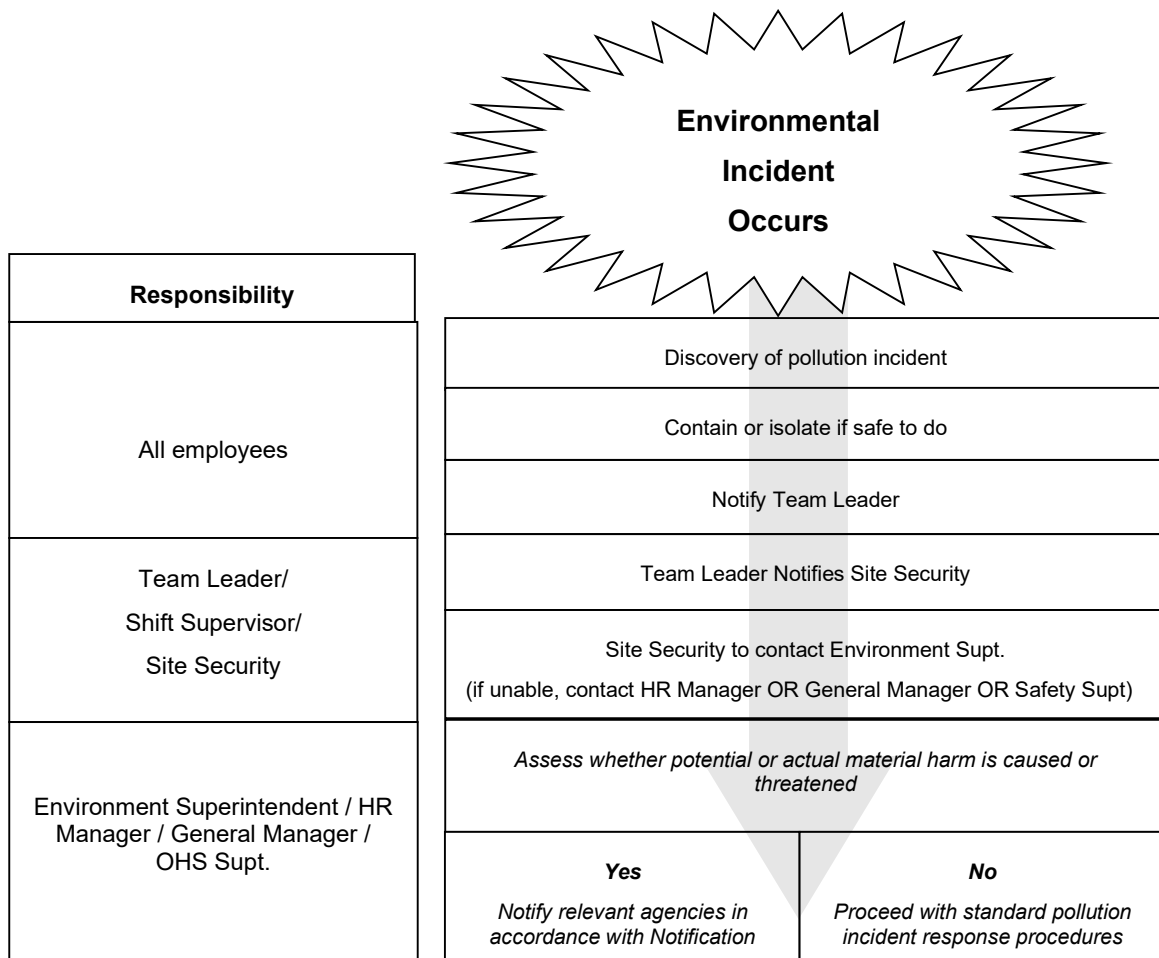
Notification will ordinarily be made by Management once notification of the incident occurrence is escalated. This escalation of events is defined in the sites emergency response Flipcharts which are available on departmental notice boards. The escalation process will raise the alarm to management level, at which point the notification to authorities occurs.

Material harm is defined as:

- 1) actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- 2) 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), where 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.

Responsibilities Flowchart for incident escalation and notification to Authorities.

**Escalation Procedure for Significant Environmental Incidents**  
**(Incident that cause or threaten 'material harm' to the Environment)**





Examples and guidance for notification to Authorities.

Incident	Decision	Reason
Oil spill into stormwater drain at Waratah site.	NOT Notifiable.	Oil retention weirs operate to prevent floating oil leaving the site
Noise	NOT Notifiable	Noise is not considered to cause material harm to the environment.
Odour	NOTIFIABLE IF....	Odour MAY be notifiable if the source of the odour may be a cause of material environmental harm.
Small spills or emissions where material harm will not occur.	NOT Notifiable	The incident is trivial, and remediation costs are less than \$10,000
Fume emissions that dissipate locally on site or that do not impact on the environment or community.	NOT Notifiable	No material harm caused. In some cases, the Environment Supt may make a courtesy call to the EPA to advise of the incident.
Spills on site that are effectively prevented from reaching drains or contaminating soils.	NOT Notifiable	No environmental harm. Not notifiable unless cleanup costs exceed approx \$10,000
Fire of unknown material billowing smoke over community. Large fire, even if materials burning are known	NOTIFIABLE	Without knowing what the burning material is, there exists the possibility that the smoke MAY be causing material harm to the environment. Notify first, and update details once the source material is known.
Soluble oil spill into stormwater drain at Waratah site. (eg: discoloration noted in drain outlets)	NOTIFIABLE	Soluble oils not retained by oil weirs and will flow to downstream river system harming aquatic life.
Truck diesel tank ruptures at east gate, fuel pours down street and into stormwater drains.	NOTIFIABLE	Even without being yet certain that Material Harm has been caused, the POTENTIAL for material harm to the environment triggers the notification.

Recording/Reporting Requirements for Notification to Authorities.

*[(The authorities to be notified include a mandatory list as required by the new legislation. All these authorities need to be notified regardless of the type of incident. They are:*

- *000-emergency services*
- *EPA*
- *Ministry of Health*

- *Workcover*
- *Local Council*
- *Fire and Rescue*

*Your management team or site security will make the notifications.*

- *See details of notification process (including contact numbers) are in Section 16 below*

*All employees play a part in escalation of the event to Management*

## **14. COMMUNICATING WITH THE COMMUNITY**

If a pollution incident has, or could, impact upon the community, notification must be made to the affected or potentially affected persons. The notification must include *“any specific information that could be provided to the community so it can minimise the risk of harm. For example, this could include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants, or avoiding the use of water in creeks or rivers affected, or likely to be affected, by a pollutant discharge.”* – EPA Environmental Guideline.

The following page describes Moly-Cop Waratahs method for communication with the Community. It is vital that employees other than Management do not make statements to community members because of the risk of mis-information or conflicting information. A single source of communication via the Emergency Services in consultation with site Management will be made.



## 15. COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY IN THE EVENT OF AN ENVIRONMENTAL INCIDENT.

[POEO Act clause 98C(1)(i)]

Whilst the Moly-Cop Waratah site is considered a low risk site, and therefore is not required to be registered as a Major Hazard Facility under Workcover requirements, there remains the potential for smaller scale environmental incidents to occur. In the event that an incident has occurred that could potentially adversely alert or harm the local community, a notification of the event, including updates needs to be communicated to affected or potentially affected persons.

Moly-Cop Waratah have an existing legal obligation to report to the relevant authorities (including Emergency Services, EPA, Hunter New England Health, and Workcover.) incidents that have, or could, cause material environmental harm. It is therefore anticipated that any incident for which Community Notification is required will have already triggered the involvement of the Emergency Services.

As described in the Newcastle City Disaster Plan (known as "Displan" and available on the Newcastle City Council website), the Emergency Services have at their disposal a variety of methods with which to alert the community of issues that could impact upon their wellbeing. These methods include public address loudspeakers fitted to vehicles, radio and TV announcements, widespread telephone messaging capability, and others.

All hazards and potential incidents that have been identified as possibilities on the Moly-Cop Waratah site, including potential affected areas, have been assessed to be within the response capability of the Emergency Services and Newcastle City "Displan" framework.

Due to the extensive experience and capability of the Emergency Services, Moly-Cop Waratah rely upon those services to make Community Notification if, when, and how they deem appropriate. The Moly-Cop Waratah site maintains a 24hr telephone line (0249 740 371), published in the local White Pages, to allow enquiries and updates from community members.

After an Emergency incident, Moly-Cop Waratah may issue an additional communication direct with the Community to give further details to the Community as to the cause and response to the incident.

**MOLY-COP WARATAH NOTIFICATION RECORD**  
**EXTERNAL NOTIFICATION OF POLLUTION INCIDENT**

This form is to be used for notification of pollution incidents where actual or potential material harm<sup>1</sup> to the environment is caused or threatened. It is not intended to notify 'trivial' incidents or incidents where there is no actual or potential material harm. Once completed, copies of this document must be retained for 7 years.

**16. INCIDENT DETAILS**

Where details are unknown at the time of the notification write unknown in the relevant box.

Information required	Details known at time of notification	
<b>NAME of person notifying:</b>		
<b>NAME of person who first reported the incident:</b>		
<b>Premises details:</b>	<b>Commonwealth Steel Company Environment Licence 822</b>	
<b>Date/Time of incident (If known):</b>	<b>Date:</b>	<b>Time:</b>
<b>Pollutant (If known):</b> (eg. oil, furnace fumes, soluble oil, other chemicals)	<b>Type:</b>	<b>Volume:</b>
<b>Pollutant emitted to:</b> (eg. internal stormwater drain, external stormwater drain, ground, external street, air etc)		
<b>Cause (If known):</b> (eg. overflow, mechanical failure, etc)		
<b>Weather conditions (If relevant):</b>		
<b>Action/s taken in response:</b>		

<sup>1</sup> **Material Harm** - Material harm is defined as:

- 1) Actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- 2) 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), where 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.

It should be noted that it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

## 17. EXTERNAL NOTIFICATIONS

Notify the following authorities **in order** and relay the incident details from the table above.

**Step 1** – Only complete Step 1 followed by Step 2 if there is an immediate threat to human health or property. **If not, complete Step 2 only.**

External Body	Phone Contact Details	Notification Record		
		TIME / DATE of notification	NAME of Person Notified	Initial Advice / Comment
<b>1. Emergency Services</b> (Fire and Rescue, Police, Ambulance Services)	<b>000</b> <i>Only call 000 first if there is an immediate threat to human health or property.</i>			

**Step 2** - Proceed with the following notifications **in the order provided.**

<b>2. The Appropriate Regulatory Authority (ARA)</b> -EPA for Licensed premises -Local Council for unlicensed premises	(See contact details below)			
<b>3. EPA</b> (If not already notified above)	<b>131 555</b>			
<b>4. The Ministry of Health</b> (via the local public health unit)	<b>02 4924 6477</b> (diverts to John Hunter Hospital) - ask for Public Health Officer on call			
<b>5. The WorkCover Authority</b>	<b>13 10 50</b>			
<b>6. The Local Authority</b> (Local Council)	<b>02 4974 2000</b> (Newcastle City Council)			
<b>7. Fire and Rescue NSW</b>	<b>000 (1300 729 579 if not emergency)</b>			

**18. ADDITIONAL INFORMATION REQUESTED OR SUPPLIED DURING NOTIFICATIONS**

Maintain a record of any additional information requested and any response supplied using the table below.

<b>Authority</b> (list here which authority the additional information was requested by or provided to)	<b>Information Requested</b> (only required if information is requested that is over and above the incident details listed)	<b>Information Provided</b> (brief description of response to request)
<b>The Ministry of Health</b> Public Health Officer		
<b>The Ministry of Health</b> Public Health Officer		
<b>The Ministry of Health</b> Public Health Officer		
<b>EPA</b>		

## 19. UPDATES

Updates are required in accordance with the Steps outlined in Section 2 above where a material change to the information initially notified occurs. Material changes include, but are not limited to the following triggers:

- Further assessment confirms that no actual material harm has occurred.
- The incident has been controlled and contained and full and final details can be provided.
- An agency has requested an update within or at a certain time.

<b>Authority</b> (list here which authority information was provided to)	<b>TIME / DATE</b> <b>of update</b>	<b>NAME</b> <b>of Person Notified</b>	<b>Information Supplied</b>

## 20. VERSION HISTORY

Version	Issue Date	Key Changes	Authorised by	Review Date
1	31.8.12	First release	J.Neave	31.8.12
2	12.1.2015	Now includes odour as possible notifiable source.	J.Neave	12.1.15
3,4,5	2015	Various minor changes	J.Neave	various
6	21.6.2016	Removed reference to Arrium Crisis Procedure.	J.Neave	21.6.16
7	15.2.2018	Reviewed. No changes made.	J.Neave	15.2.18
8	26.3.2018	Added recirc water to risk table.	J.Neave	26.3.18
10	21.10.2020	Added comment about fire of know materials	J.Neave	21.10.21
11	19.08.2021	Combined PIRMP and Notification Record Document	J.Neave	19.08.21