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1 INTRODUCTION

1.1 Pollution Incident Response Management Plan Purpose/ Background

Australian Amalgamated Terminals Pty Ltd (AAT) is a Licensee holder of an Environment Protection Licence number 3578. This Licence covers the AAT facility premises with a Scheduled Activity being Shipping in bulk. This Pollution Incident Response Management Plan (PIRMP) was prepared to meet the specific requirements for pollution incident response management plans as set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009.

In summary, this provision requires the following:

- All holders of environment protection Licences must prepare a pollution incident response management plan (section 153A, POEO Act)
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- AAT must keep this plan at the premises to which the environment protection Licence relates.
- AAT will test the plan in accordance with the POEO(G) Regulation (clause 98E).
- If a pollution incident occurs during an activity so that material harm to the environment is caused or threatened, AAT must immediately implement the plan (section 153F, POEO Act).

This PIRMP is prepared in-conjunction with AAT's operational procedures and plans and summarizes the extent of AAT's environmental procedures and Safety, Health, and Environment (SHE) Management System to ensure protection of the environment during operation of the Terminal. The SHE Management System is included in Appendix A of this PIRMP.

1.2 Scope

The plan provides details of Environmental Commitments, License and Legislation requirements associated with onsite operations. The plan identifies potential environmental impacts during the operations phase and specifies details of pollution control measures and strategies adopted to minimise any detrimental effects to the environment.

The plan also includes information on incident/risk management procedures and highlights individual responsibilities for plan implementation and methods for performance monitoring and PIRMP review.

The plan has been prepared in accordance with requirements of Department of Infrastructure, Planning and Natural Resources (DIPNR) requirements, and the following documents: -

- NSW EPA Environmental Guidelines: Preparation of pollution incident response management plans 2012.
- Protection of the Environment Legislation Amendment Act 2011 No 63.
- DIPNR Conditions of Approval – April 2006.
- Statement of Commitments in Section 5 of SKM Environmental Assessment Report – Dec 2005.
- NSW EMP Guidelines – September 2004.
- NSW Environmental Management Systems Guidelines – January 1998.

1.3 PIRMP Objective

The Objective of this PIRMP is 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, SafeWork NSW, and Fire and Rescue

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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.
- AAT have endeavoured to meet these objectives by:
 - Identifying current license conditions and applicable legal constraints on operations.
 - Identifying existing and potential risks to the environment from operations.
 - Analysing environmental risks and developed management measures for protection.
 - Summarising existing emergency procedures and outline further incident management requirements.
 - Identifying those responsible for plan implementation and management.
 - Updating and maintaining performance monitoring procedures.

Fulfillment of these objectives will set a framework for AAT to operate as an environmentally aware and responsible organisation.

1.4 Definition of ‘pollution incident’

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.”

AAT are required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW and the local council. “‘Immediately’ has its ordinary dictionary meaning of promptly and without delay. This is to ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.”

1.5 Involved Parties/Stakeholders

NSW Ports (NSWP) manages the berth, AAT Port Kembla (AAT) manages the infrastructure and equipment, and Stevedore operators manage the handling and transport of goods. NSWP is the proponent of the Development Application and leases the terminal to AAT under a lease agreement. Stevedore operators use AAT equipment and land under an operating Licence.

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1.6 Site and Operator Details

AAT have entered into an agreement with NSW Port to manage facilities for the stevedoring of automotive, general, and containerised cargo. Stevedoring operations are carried out by general stevedores. Stevedoring Operators can be contacted through AAT Port Kembla.

AAT Port Kembla Terminal

Yampi Way, Port Kembla, NSW, 2505
 Phone: 02 4221 0900
 Fax: 02 4225 7901
 Contact Person: Evan Wissell, Terminal Manager

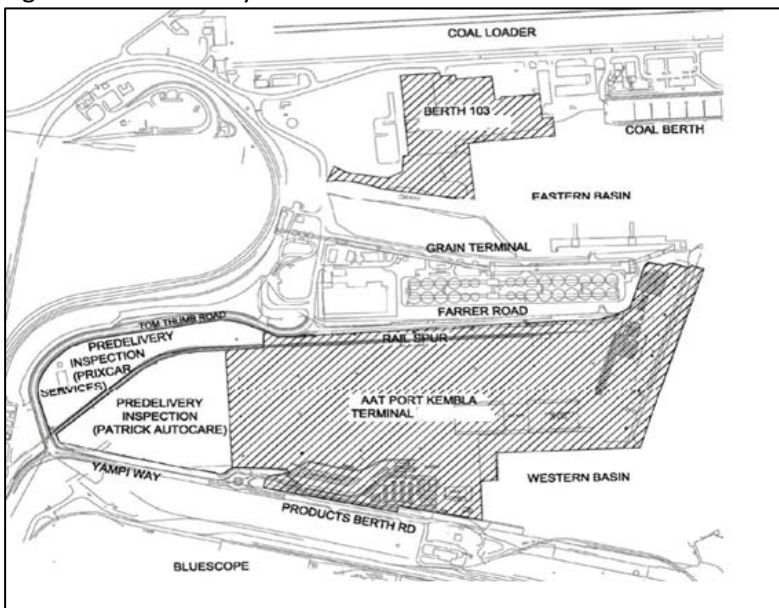
NSW Ports

Port Botany PO Box 297, Botany NSW 1455, Australia
 Port Kembla Unit 1, Maritime Centre, 91 Foreshore Road, Port Kembla NSW 2505
 Phone: 1300 922 524
 Contact Person: Bryan Beudeker, Environment Manager

The AAT Port Kembla Terminal is spread across two sites serviced by Berths 105-107 and Berth 103. The first site (serviced by Berths 105-107) is located on the north-western side of Inner Harbour, Port Kembla. It is bounded by the Grain Terminal to the east and BlueScope Steel to the west. The northern boundary is bordered by PrixCar services & inspection facilities. The southern boundary of the site is bordered by Inner Harbour.

The second site (serviced by Berth 103) is located on the north-eastern side of Inner Harbour, Port Kembla. It is bounded by the Coal Terminal to the east, south and north, the Western Drain and Eastern Basin to the west. The site is zoned for Special Uses 5(e) – Port Zone under Wollongong City Council (WCC) Wollongong Local Environmental Management Plan 1990. Figure 1 depicts the site location.

Figure 1: Site Locality Plan



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2 OPERATIONAL LICENCES

AAT Port Kembla currently requires the following Licenses relevant to operations at the terminal.

2.1 Bulk Materials Handling

Bulk materials will be handled by independent Stevedoring operators in accordance with Port Operational Requirements. AAT Bulk Materials Handling Licence NO. 3578 will be maintained and operations will comply with conditions therein. A copy of the Environmental Protection Licence is included in Appendix B.

2.2 Trade Waste Permit

Approval from Sydney Water for discharge of wastewater to the sewer system from the Quarantined approved Washbay, and Equipment Washbay. AAT will adhere to the conditions of the Licence from Sydney Water. A copy of the current Sydney Water Trade Waste Agreement is included in Appendix C.

2.3 Notification of Dangerous Goods on Premises

AAT has current NSW SafeWork certification for the fuel storage onsite. Requirements as set down by NSW SafeWork have been met to ensure fuel storage compliance. The fuel storage was initially inspected by a Dangerous Goods Consultant who is a member of the Australasian Institute of Dangerous Goods Consultants (AIDGC).

2.4 Import/Export of Dangerous Goods

Although this is not a licence, AAT manages the Import and Export of dangerous goods in accordance with NSW requirements, NSW Standard Operating Procedure for Dangerous Goods/Instruction for Port Users. This also outlines recording guidelines for the quantity and type of dangerous goods to be reported to the DOP as required by Condition of Approval 2.6.

3 SITE FEATURES

Most of the site is paved, with surface types including asphalt, concrete, and pavers. Pavement strengths range from light duty car pavement to heavy duty container hardstand.

The main site features / structures include the following:

- Link Span Cargo Building
- Cargo Building (Berth 103) (Quattro)
- Stevedore Office and Amenities (Berth 103)
- Existing Cargo Building
- Security Gatehouse (Berth 105-107 and Berth 103)
- Maintenance Shed / Workshop
- S Shed (Stevedore Gear Stores, AAT Offices and Amenities)
- Container & Vehicle Washbay (Department of Agriculture (DAWR) approved) (Berth 105-107 and S Shed)
- Administration Building (Receival and Delivery Office, Stevedore Offices, and Amenities (Berth 105-107)

An existing General Arrangement of the Berth 105-107 site and the Berth 103 site is shown on Drawings P217-SK93-03 and P301-SK93-07 respectively, in Appendix D of this PIRMP.

4 OPERATIONAL ACTIVITIES

AAT manage terminal facilities for the operation of an automotive, general, bulk, and containerised cargo handling terminal. The terminals major activities include the following.

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4.1 General Cargo and Container Handling

General cargo and containerised goods are imported and exported to and from the site via ship. Ships dock at Berth Nos. 103, 105, 106 and 107 whilst cargo is loaded / unloaded on to the wharf apron by mobile crane and/or Roll on Roll Off (RO/RO) forklift equipment.

Imported cargo discharged from the ship is transferred to onsite storage areas by forklift. All weather sensitive cargo is stored inside the link span cargo building adjacent to the Berth 107 or the under tarps at Berth 103, for protection against weather. Containers are stored in stacks adjacent to the cargo sheds.

General cargo and containers are collected and transported offsite by road truck. Truck loading is carried out by and forklift directly adjacent to the onsite storage areas.

General cargo and containers for export will be transported to site by road truck, unloaded and transferred to the onsite storage areas by forklift. At the time of export, cargo is transferred to the berth front by forklift, for loading to the ship.

4.2 Vehicle Handling

Vehicles are imported to the site via ship. Ships dock at Berth 103, 105, 106 and 107 whilst vehicles are driven from the ship, via the ship's ramp, to a set down area within the site.

Vehicles are parked onsite in marked vehicle parking slots.

A portion of imported vehicles are "processed" in the adjacent Pre-delivery Inspection (PDI) Facilities.

Vehicles that are not processed at this facility are transferred offsite by road truck hauling car carrier trailers.

4.3 Bulk Operations

Bulk Cargoes are handled at Berth 105-107, and Berth 103 in accordance with EPA Licence conditions.

4.4 Ancillary Operations & Facilities - Berths 105-107

Most ancillary operations and facilities are located adjacent to the site entry along Yampi Way to avoid conflict with site operational areas.

Security Gatehouse

The security gatehouse located at the site entry is manned by security personnel 24-hours a day. Security personnel control all movement in and out of the site.

Administration Offices & Amenities

AAT staff manages the overall operation of the site. All AAT staff are accommodated in an office and amenities building located adjacent the truck marshalling area off Yampi Way. R&D staff manages receipt and delivery of all cargo. All R&D staff are accommodated in the Administration Building office and amenities buildings adjacent the visitor carpark adjacent to the gatehouse. Amenities buildings for stevedoring staff are located inside the security boundary adjacent to the office area.

Maintenance Garage / Wash Bay

Maintenance of operational equipment and vehicles requiring general servicing, including fluid changes, tyre, and battery replacement etc, repairs, washing and refuelling will be conducted in the Maintenance Garage. Onsite maintenance facilities include a maintenance workshop, including overhead crane and covered equipment wash bay. A demountable office and amenities building for maintenance staff is located adjacent to the maintenance workshop.

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Quarantine Washbay

A Quarantine approved container washbay is located behind the Wharf Amenities Building adjacent to Berth 105. A second Quarantine Approved vehicle washbay is located adjacent to S Shed.

The washbays are used to clean containers, cars, machinery and cargo under Quarantine direction. The washbay is an approved facility by Department of Agriculture (DAWR), Quarantine Department.

4.5 Ancillary Operations & Facilities Berth 103

Security Gatehouse

The security gatehouse located at the site entry is manned by security personnel as required. Security personnel control all movement in and out of the site.

Administration Offices & Amenities

AAT staff manages the overall operation of the site. All AAT staff are accommodated in an office and amenities building located adjacent to the truck marshalling area off Yampi Way.

R&D staff manages receipt and delivery of all cargo. All R&D staff are accommodated in office and amenities buildings adjacent to the visitors carpark adjacent to the gatehouse.

Amenities buildings for stevedoring staff are located inside the security boundary adjacent to the office area.

4.6 Hours of Operation

The terminal operates 24 hours a day, 7 days a week.

4.7 Traffic Flow and Carparking

The Berth 105-107 visitor and staff carpark is located adjacent to the site entry off Yampi Way. Staff and visitors enter the carpark via Yampi way. The carpark capacity is 200 cars. The Berth 103 visitor and staff carpark is located adjacent to the entry off Tom Thumb Road. The carpark capacity is 70 cars. Staff and visitor vehicles are not authorised to access terminal operations areas.

Traffic through the operational areas of the site is managed through truck marshalling areas and internal truck roadways with directional line marking. Traffic flow is indicated on Drawing No. P217- SK93-02 for the Berth 105-107 site, and on Drawing No P301-SK93-06 for the Berth 103 site, in Appendix D.

Forklift movements are concentrated around the berth front, container storage bays and cargo sheds. Operational equipment and site vehicles include the following types:

- Mobile Crane
- Forklifts
- Cars / Utilities
- Dock Trucks / Ramp runners

4.8 Site Security

The AAT Terminal is secured by boundary security fencing to comply with requirements of Australian Customs, The Department of Infrastructure and Transport and the Federal Government's Maritime Transport and Offshore Facilities Security Regulations 2003. All access to the site is through the gatehouse and requires Maritime Security Induction Card (MSIC) application and induction.

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4.9 Transport Code of Conduct

The Transport Code of Conduct has been prepared by NSWSP to minimise and manage traffic impacts associated with the project. The Transport Code of Conduct is included in Appendix E.

5 SUMMARY OF RISKS AND PRE-EMPTIVE ACTIONS TO PREVENT/MINIMISE KEY POTENTIAL ENVIRONMENTAL POLLUTION CONTAMINATIONS AND RISKS TO HUMAN HEALTH

This section details environmental issues associated with terminal operations and requirements for environmental protection.

5.1 Risk Assessment of Main Hazards to Contamination of the Environment and Human Health.

POTENTIAL RISKS	POTENTIAL CONSEQUENCES	RISK LEVEL TO ENVIRONMENT	RISK LEVEL TO HUMAN HEALTH
Fuel Storage Leaks			
Diesel storage	Land Contamination	Medium	Low
Unleaded storage	Storm water Contamination	High	Low
LPG Storage		High	Low
Stored Chemical Leak	Land Contamination Storm water Contamination	Medium	Medium
Refuelling Leak	Land Contamination Storm water Contamination	Medium	Low
Cargo/Container Leak (hazardous and non hazardous)	Land Contamination Storm water Contamination Air contamination	High	High
Broken Machinery Hydraulic Hoses Leaking Oil	Land Contamination Storm water Contamination	Medium	Low
General Waste and litter	Storm water Contamination	Low	Low
Trade Waste	Land Contamination Storm water Contamination	Low	Low
Quarantine Waste	Storm water Contamination	Low	Low
Workshop Waste	Land Contamination Storm water Contamination	Low	Low
Machinery Exhaust Emissions	Air Contamination	Low	Medium
Bulk Cargo Operations	Land Contamination Storm water Contamination Air contamination	Low	Low
Emission from a Fire Event	Land Contamination Storm water Contamination Air contamination	High	High

5.2 Measures

Existing Control measures in place to pre-empt potential pollution risks and contamination consequences to environment and human health are listed below

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5.3 Stormwater Protection Strategies and Controls

The site incorporates Port Kembla Inner Harbour Multipurpose Berth Nos. 103, 105, 106 and 107. Operation of the site has the potential to impact the water quality of the Harbour through the discharge of pollutants through the stormwater system.

The site stormwater system consists of numerous localised catchment areas as depicted on Drawing No. P217-SK93-03 for the Berth 105-107 site and on P301-SK93-07 for the Berth 103 site. These drawings are provided in Appendix D with catchment areas being numbered for ease of reference.

All pavement areas drain to open grated pits connected to pipes feeding the main reinforced concrete stormwater trunk pipes, running north to south along the western boundary of the terminal, and discharging into Inner Harbour.

Pollutant treatment and control devices minimise pollutant emissions into the stormwater system. Details of potential pollutants and management controls are summarised in Table 1.

Table 1: Potential Stormwater Pollution Issues and Pre-emptive measures

Issue	Pre-emptive Measure
<p>Catchment Area 1A: Berths 105 and 106 – Existing - Constructed prior to 1995</p> <p>Potential pollutants: Debris / general litter Suspended solids Fuel / hydrocarbons from operational fleet and/or refuelling activities Various products from container spills</p>	<p>Stormwater is captured on the berth front by a series of grated trenches and directed through pipes and pits to be discharged to the Harbour via a tidal flap.</p> <p><i>Spill Response Kits</i> including absorbent material are kept on site for use in the event of product spills.</p> <p>Spill response kits, spill response tub trailer are stored in strategic locations In the event of a spill trained staff will deploy the appropriate equipment.</p>
<p>Catchment Area 1B: Multi-purpose Berth 130m Extension – Existing – Constructed in 2005</p> <p>Potential pollutants: Debris / general litter Suspended solids Fuel / hydrocarbons from operational fleet and/or refuelling activities Various products from container spills</p>	<p>Stormwater is captured and passed through one of four Pollution Control Pits servicing each part of the Berth extension. Stormwater is then discharged to the Harbour via a flood gate. Details are provided in Appendix F.</p> <p><i>Spill Response Kits</i> including absorbent material are kept on site for use in the event of product spills. Spill response kits, spill response tub trailer are stored in strategic locations In the event of a spill trained staff will deploy the appropriate equipment.</p>
<p>All Catchment Areas– Constructed in 2007 by AAT</p> <p>Potential pollutants: Debris / general litter Suspended solids Fuel / hydrocarbons from operational fleet</p>	<p>Stormwater is captured and passed through either <i>Ecosol RSF4300</i> Solid Pollutant Filter/Oil and Grease Arresters or <i>Humeceptor STC 18's</i> (or approved equivalent) prior to discharge to Inner Harbour.</p> <p>Details are provided in Appendix F.</p>

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Various product from container spills	<i>Spill Response Kits</i> including absorbent material are kept on site for use in the event of product spills. Spill response kits, spill response tub trailer are stored in strategic locations. In the event of a spill trained staff will deploy the appropriate equipment.
Catchment Area: Fuel Facility	The Fuel Facility is roofed and bunded. Any water captured on the fuel facility slab drains to a sump pit and is pumped through a Coalescing Plate Separator (CPS) and is discharged into sewer.

5.4 Land Contamination

Operational activities may potentially cause land contamination, particularly in the event of a fluid spill from a container or operational equipment or storage tank.

Table 2 summarises potential land contamination issues during operations, and methods to prevent detrimental effects.

Issue	Pre-emptive Measure
<p>Fuel / Fluid leaks from storage or operational fleet in operation or during refuelling;</p> <p>Fleet whilst refuelling</p> <p>Fleet in maintenance area during maintenance procedures</p> <p>Container leakage, initiated by damage to the container during loading/unloading, transport, or storage, as a result of containers being dropped or collision by mobile equipment.</p>	<p>The majority of the site is paved, with surfaces including asphalt and concrete. The risk of land contamination in the event of a spill is low as all pavements are impervious and prompt spill response will prevent fuel / fluids penetrating the pavement to significant depth.</p> <p>Any fuel spill event during refuelling of operational fleet is addressed in accordance with procedures detailed in the <i>AAT Emergency Response Procedure Manual</i>. Plant / equipment used onsite is maintained to prevent leaking fuel, oil or chemicals.</p> <p>The Quarantine Washbay is suitably Bunded to ensure the entire contents of a contaminated container can be retained with the bund.</p> <p><i>Spill Response Kits</i> including absorbent material are kept on site for use in the event of product spills. Spill response kits and the spill response tub trailer are stored in strategic locations. In the event of a spill trained staff will deploy the appropriate equipment.</p>

5.5 Air Contamination

Operational activities may potentially generate dust and vehicle emissions that may have a detrimental effect on the environment and neighbouring properties, and the adjacent Inner Harbour waterway.

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Table 3 summarises potential air quality issues during operations, and management measures methods to prevent detrimental effects.

Issue	Pre-emptive Measures
Exhaust emissions from plant and equipment	Plant / equipment used onsite is maintained to prevent excessive exhaust emissions. Plant / equipment will not be left idling when operations permit.
Dust emissions from bulk operations	Use of Enviro Hoppers to minimize dust PPE/dust masks provided to employees Water suppression Regular Sweeping and dust collection
Emission from a fire event. Areas of concern include: Cargo storage (containerised & break bulk) Mobile fleet and fuelling equipment Building infrastructure	Firefighting equipment located in various locations in accordance with the BCA. Details of equipment are specified in the <i>AAT Emergency Response Plan</i> . Rapid containment and extinguishing of fires prevent air pollution events. The possibility of electrical system malfunction may lead to localised equipment fires. Equipment is maintained regularly to prevent malfunction. Rapid response measures to fire situations are set out in the <i>Emergency Response Plan</i> .

5.6 Waste Management

Operation of the site generates some waste, which if not properly managed, may escape into the environment and cause detrimental effects. Waste generated from site operations includes: -

- Trade waste (including wastewater from the QAP washbay and operational equipment washbay areas)
- Quarantine Waste from QAP Quarantine operators
- Maintenance Workshop waste
- General Office / Amenities waste
- General garbage / litter

Details of waste types generated, and management procedures are summarised in Table 4.

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Table 4: Potential waste management issues and Pre-emptive Measures

Issue	Pre-emptive Measures
<p>Trade waste</p> <p>Emissions expected from 2 sources, including: -</p> <ol style="list-style-type: none"> 1. Quarantine container washbay 2. Operational equipment / vehicle washbay. 	<p>Trade waste emissions from each source are treated with wastewater treatment equipment approved by Department of Planning and Sydney Water.</p> <p>Wastewater from the Quarantine container washbay and vehicle washbay is treated prior to discharge. This includes a series of settlement tanks with a sand filter and ozone disinfection for recycling of water for reuse in the washbay. Details of the treatment equipment are included in Appendix G.</p> <p>Wastewater from the equipment / vehicle washbay is treated prior to discharge to sewer. Details of the treatment equipment are included in Appendix H. This includes settlement pits and coalescing plate separator (CPS) prior to discharge to sewer. Washbay wastewater is minimised by the fitting of trigger nozzles on all washbay hoses. Trade waste emissions will be in accordance with the requirements to be determined with Sydney Water Trade Waste Agreement. Wastewater from both washbays will either be discharged to sewer or recycled for reuse. No wastewater from washbays will discharged to stormwater.</p>
<p>Ship Waste</p>	<p>International vessels making their first Australian port call at Port Kembla – waste is to be collected, treated, and disposed in accordance with DOA requirements to manage quarantine risk. The ship’s master must notify DOA 12-48 hrs prior to arrival and submit a Quarantine Pre-Arrival Report. All other vessels waste for disposal must be collected and transported from site by a licensed waste contractor.</p>
<p>Maintenance Workshop waste</p>	<p>Waste products from equipment and vehicle maintenance operations will generally include:</p> <ul style="list-style-type: none"> - Damaged and replaced parts and tools - Discarded fluids and lubricants - Empty containers and packaging - General garbage <p>Discarded fluids and lubricants are stored in a sealed storage tanks located within a bunded area at the maintenance workshop. The storage tanks are regularly removed by a licensed waste contractor.</p>



	General garbage is disposed in general waste bins to be removed by Licensed Contractor.
Fuel Spill Waste	Any fuel spill event during refueling of operational fleet is addressed in accordance with procedures detailed in the <i>AAT Emergency Procedures Manual</i> . Any products used in the containment / cleaning of a fuel spill are stored in sealed chemical waste drums and promptly removed by licensed waste contractor.
General Office / Amenities waste	General office waste generation is minimized using office and amenities product refills where possible. General waste bins are provided in all office, amenities, and recreational areas.
Quarantine /Waste Disposal	All waste is removed from site by licensed waste contractors on a regular basis and disposed offsite and relevant tracking evidence and record evidence of approved disposal.

6 INVENTORY OF POTENTIAL POLLUTANTS

A list of potential site pollutants is contained within the site Safety Data Sheet (SDS) Register; these lists are maintained at Security Gate House, AAT Offices, and Workshop. A copy of SDS Register is included in Appendix H. The location of these potential pollutants is shown on the SDS register and major fuel storage locations are shown on the Site Emergency Response Maps.

The maximum stored quantity of diesel and unleaded petrol on the premises is as follows:

The inventory and location of Cargo storage including Hazardous and Non-hazardous can vary depending on import/export volumes. Details of inventory and location are available within the terminal cargo tracking system "Jade Master Terminals". This list of cargo and location is available for emergency services at AAT Security Gatehouse and offices.

7 SAFETY EQUIPMENT

The site maintains firefighting equipment, including hydrants, hoses, and extinguishers in accordance with current regulations. Location of this equipment is identified on the Sites Emergency Response Maps. SDS information is maintained and available at Security Gate House, AAT Offices, and Workshop. All chemical and fuel storage facilities are fully bunded to comply with current regulations.

PPE is a site requirement, to meet the WHS recommendations always. Spill containment kits are maintained and located at various points within the facility, their location is also shown on the Site Emergency Response Maps. A portable tub trailer capable of handling leaking 20 and 40ft containers (hazardous and nonhazardous) is available on site to assist any potential pollutant containment. The QAP wash bay has also been designed to hold the contents of leaking containers.

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8 CONTACT DETAILS AND COMMUNICATING WITH NEIGHBOURS

The following Agencies must be notified immediately, via telephone in the event of a pollution incident where there is a risk of material harm to the environment.

- EPA.
- SafeWork NSW.
- NSW Ministry of Health.
- NSW Fire and Rescue.
- Wollongong City Council.

Terminal contact details, emergency contacts and the above-mentioned agencies are included emergency contacts within AAT's emergency response procedures. A copy of the Emergency Contacts is included in Appendix I.

Due to the industrial location of the facility and significant distance from residential areas AAT does not believe its operations pose a pollution risk to local residential community. AAT's industrial neighbours in the Inner Harbour and relevant contact details are also included in the Emergency Contacts.

9 MINIMISING HARM TO PERSONS

AAT maintains emergency response procedures including activation of evacuation alarms and gives clear directions for muster locations. Emergency evacuation drills are conducted on a periodic basis.

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

In the event of major harbour Oil, Chemical or other fluid spill the operating emergency procedure would be NSW's Marine Oil & Chemical Spill Contingency Plan. NSW shall be contacted immediately (phone: 4274 4571 or 4275 0159, fax: 4274 6147, VHF Marine: Channels 11 or 16)

For landside incidents AAT maintains various emergency response procedures including:

- Emergency Response Plan
- Fire Actions
- Serious Injury/Illness Actions
- Environmental/Hazardous Spill- Gas/Liquid/Solid
- Structural Fault Armed Hold Up
- Bomb Treat
- Civil Disorder
- Terrorist Attack

The hazardous procedure details who should be contacted in the event of a pollution incident. A copy of the emergency actions for Environmental/Hazardous Spill is included in Appendix J.

Terminal contact details, emergency contacts and contacts of neighbouring businesses are included emergency contacts within emergency response procedures. A copy of the Emergency Contacts is included in Appendix I.

11 PERFORMANCE MONITORING AND RECORD KEEPING

Environmental protection control measures outlined in Section 5 of this document are monitored on a periodical basis by completion of a Site Safety Survey to ensure that PIRMP objectives are being met, and any problems are detected and rectified as soon as possible.

This section identifies monitoring and reporting requirements related to general activities and relevant environmental issues and links them with operational plans and schedules.

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11.1 Site Safety Survey

Performance of environmental pollution control measures and general housekeeping are periodically monitored for functionality and serviceability. Results of monitoring are recorded on a Site Safety Survey. The form specifies all items monitored and allows for observation recording of any abnormalities.

In the case of non-compliance with the register records the date and details of non-compliance and specify any required action and the person(s) responsible for implementing the action. Rectification works are signed off by the Terminal Manager. This process is conducted under AAT's Site Safety and Housekeeping Procedure.

Checklists and non-compliance forms are filed and kept onsite.

As required a summary report is prepared outlining:

- Date of checks/Checking personnel
- Details of problems identified
- Details of action taken to rectify problems
- Report of results of actions

11.2 Incident Reports

In the event of an incident, details are recorded on an Incident Register Form. The form registers the date and details of the compliant/incident and specifies any required action and the person(s) responsible for implementing the action. All completed forms are filed in a dedicated Complaint / Incident Register File kept onsite.

11.3 Maintenance Records

A copy of all invoices received from the cleaning of wastewater and stormwater protection equipment are kept.

11.4 Waste Contractor Review

Various licensed waste contractors are contracted by AAT to clean wastewater equipment and carry out collection and disposal of general garbage, liquid wastes, and recyclables. Management dissatisfaction may result in the acquisition of a different waste contractor to perform tasks.

11.5 Record Management

All the above-mentioned report forms and documentation are stored. The information is available to any authorised inquirers upon request. All records are kept in the system for a minimum of two (2) years.

11.6 Plan Review

The Safety and Environment Plan will be reviewed annually or when there are any major changes to the site or operation to ensure that the methods and procedures outlined remain effective in protecting the environment and fulfilling AAT/NSWP and PIRMP objectives.

11.7 Complaints Handling

All complaints in relation to operation of the General Cargo Handling Facility are received and registered by NSW Ports and referred to the relevant party for action. Upon receipt of the complaint from NSWP the following action shall be taken.

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1. Investigate the validity of the complaint.
2. Implement corrective actions as appropriate.
3. Advise NSW of the outcome of the investigation and any actions taken.
4. NSW provides feedback to the complainant.

Contact details for complaints are as follows:

Phone: 1300 922 524

Email: enquiries@nswportskembla.com.au

Online Form: [NSW Ports Online Form Submission](#)

Address: Unit 1, Maritime Centre, 91 Foreshore Road, Port Kembla NSW 2505

NSWP has installed appropriate signage on Tom Thumb Road to display contact details for complaints.

12 MANAGEMENT RESPONSIBILITIES

12.1 General

Measures and procedures identified in this PIRMP are summarised from AAT measures and policies conducted under AAT's SHE Management System. Under this system the measures and procedures are assigned to specific peoples or parties who are responsible for the successful implementation of the task. Key roles involved in management of PIRMP, and other AAT Policies are identified in the following Sections.

12.2 Managing Director, General Manager, Commercial and Risk and OH&S & HR Coordinator

These AAT Responsible Officers are responsible for the following tasks:

Policies and procedures are developed, implemented, and reviewed in consultation with the Workplace Health and Safety Committees.

Investigation process is supported and sufficiently resourced and that results are acted on.

Managers and supervisors have knowledge and skills to implement policies and procedures.

12.3 Terminal Manager

The AAT Terminal Manager is responsible for the overall operation of the terminal and all staff onsite.

The Terminal Manager has a responsibility for the following tasks:

- Co-ordinate and conduct site emergency drills.
- As outlined in the Incident Reporting and Investigation Procedure.
- Policies and procedures are implemented.
- Arrange appropriate training in accident and incident procedures.
- Ensure required investigations are conducted.
- The Incident Report Form is completed and forwarded to the National Operations Manager and National Safety Co-ordinator.
- Site Safety Improvement Survey is conducted and filed.

12.4 Warden

The AAT Site Warden is responsible for the following tasks:

- Supervise evacuations.
- Attend chemical spills and assess situation, liaise with relevant bodies, and implement appropriate action as outlined in the Emergency Response Plan.

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12.5 Employees/Contractors/Visitors

The AAT Employees/Contractors/Visitors are responsible for the following tasks:

- Complete 1-STOP MSIC induction.
- Report Incidents and provide recommendations.
- Be familiar with Emergency Response Maps, location of Emergency Contact Lists, and
- Muster Points.

13 SITE INDUCTION / TRAINING FOR VISITORS AND PERSONNEL

13.1 Visitors to Office / Operations Areas

Visitors to the office areas do not generally enter operational areas of the site. Visitors required to enter operational areas are signed-in at the security gatehouse, provided with safety wear, and accompanied by security, or an MSIC card holder, always whilst in the operational area.

13.2 Visitors Performing Operations / Services

Visitors entering the site via vehicles for operational or service provision requirements including delivery / receipt of containers, vehicles, and general cargo; postal / product deliveries; waste removal services; and diesel refuelling; will need to have completed 1-STOP/MSIC Safety. Induction or be escorted.

Induction is via a web-based program to gain a Maritime Security Identification Card (MSIC) and includes relevant information relating to Occupational, Health and Safety (OH&S) requirements, Emergency Management Plan requirements, and PIRMP requirements.

13.3 Office Personnel

All office staff are inducted through the MSIC program and then receive formal training at the commencement of employment. Training includes all relevant information relating to Occupational, Health and Safety requirements, Emergency Management Plan requirements, and PIRMP requirements.

Office personnel are kept abreast of all relevant changes to OH&S requirements, Emergency Management Plan requirements, and PIRMP requirements.

13.4 Operations Personnel

All operations staff are inducted through the MSIC program and then receive formal training at the commencement of employment. Training includes all relevant information relating to OH&S requirements, Emergency Management Plan requirements, and PIRMP requirements.

Where relevant, operations staff are trained to identify and respond to OH&S, emergency, and environmental issues, and incidents, and contact the relevant authorities.

Operations personnel are kept abreast of all relevant changes to OH&S requirements, Emergency Management Plan requirements, and PIRMP requirements.

14 RISK MANAGEMENT / EMERGENCY RESPONSE

Potential risks and incidents due to operations at the site are managed in the AAT Emergency Response Plan (ERP).

The ERP provides contact details for Wardens and Emergency Services. The Plan addresses the following emergency situations: -

- Evacuation
- Chemical Spill

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- Accident / Illness
- Earthquake
- Fire
- Bomb Threat

A copy of the Terminal ERP Map is provided in Appendix D of this PIRMP. The Emergency Response Procedures are covered in the SHE Management System, see Appendix A.

15 TESTING OF THE PLAN

Testing of the PIRMP will be done in conjunction with the Emergency Evacuation Drills, future drills (at least one every 12months) will be under a pollution scenario to check the effectiveness of the PIRMP and provide further training opportunity. The evacuation drill incorporating a pollution scenario will be conducted by the Site Chief Warden or Terminal Manager.

Training records, including when the PIRMP was last tested with supporting documents is available on AAT Port Kembla's Intranet Site (SharePoint).

16 REFERENCES

- AAT Environmental Policy (Appendix A)
- NSW Environmental Policy Statement (Appendix A)
- POEO Act 1997 – Protection of the Environment Operations Act 1997
- EP&A Act 1979 – Environmental Planning and Assessment Act 1979
- SEPP No.1 Development Standards,
- SEPP No.11 Traffic Generating Development,
- Department of Planning's Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis,
- Department of Planning's Hazardous Industry Planning Advisory Paper No.1 – Industry Emergency Planning Guidelines,
- Department of Planning's Hazardous Industry Planning Advisory Paper No.9 – Safety Management,
- Wollongong City Council Development Control Plan 6 – Commercial and Industrial Development,
- Department of Environment and Climate Change Information Sheet 5 – Emergency Fuel Spills
- Relevant Wollongong City Council factsheets
 - Washing Workshop Floors – 2000
 - Stormwater Pollution – 2000
 - Noise Annoys – 2004
 - Noise Complaints – 1999

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17 APPENDICES

Appendix A

AAT Occupation Health and Safety Management System

Appendix B

Environmental Protection Licence

Appendix C

Sydney Water Trade Waste Agreement

Appendix D

Site Drawings

Appendix E

The Transport Code of Conduct

Appendix F

Water Treatment Equipment Product Details

Appendix G

DAWR Washbay and Equipment Washbay Treatment Equipment

Appendix H

Safety Data Sheet Register

Appendix I

Emergency Contacts

Appendix J

Emergency Actions for Environmental/Hazardous Spill

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