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CHARBON

Pollution Incident Response Management Plan (PIRMP)



Document Control

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Approved **Prepared By** Comments Rev Date Ву Α Previous PIRMP revisions under Sibelco Cheryl Slapp Annual review, reviewed under Sibelco 1 08/2018 **David Fuller** 2 11/2020 Annual review, Changed to Graymont Cheryl Slapp Wayne Wolfe 3 4 5



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1. Introduction

1.1. Purpose

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

The Charbon plant is located in New South Wales, Australia, and approximately 3 kilometres south of Kandos. Excelsior Quarry provides the kiln stone for Charbon's production of lime which is transported by trucks and stored in the stone bins. The plant includes a hydrate plant, crushed quicklime plant, screening plant and coal fired kilns.

Located next to Charbon village, the eastern side is surrounded by native bushland. The western side is rural. To the south east is Centennial Coal, including workers accommodation. The land to the south west is owned by Graymont.

Charbon will be able to produce in the vicinity of 80,000 tonnes of quicklime per annum.

1.2. Compliance background

In February 2012, amendments were made to the NSW Protection of the Environment Operations Act *(POEO)* 1997. These amendments introduced the requirement for holders of an environment protection license (EPL), to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The specific requirements for PIRMPS are set out in Part 5.7A of the POEO Act. In summary, this legislation requires the following:

- ✓ holders of EPLs 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 the POEO Regulation (clause 98C) and be in the form required by the POEO Regulation (clause 98B);
- ✓ licensees must keep the plan at the premises to which the EPL relates (section 153D, POEO Act);
- ✓ licensees must test the plan at least every 12 months and after a pollution incident in accordance with the POEO Regulation (clause 98E); and
- ✓ if a pollution incident occurs in the course of an activity so that material harm to the
 environment is caused or threatened within the meaning of Part 5.7 of the POEO Act,
 licensees must immediately implement the plan (section 153F, POEO Act).

As the holder of EPL 5412, Charbon is required to comply with the POEO Act; as such, this document has been developed to satisfy the PIRMP requirements listed above.

1.3. EHS system context

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

Existing procedures and plans that may be relevant include:

✓ EHS Incident Notification & Investigation Procedure (Corporate CWP 10.202)



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- ✓ Site Incident Response Planning Procedure (Corporate CWP 10.201)
- ✓ Rapid Response Management Procedure (Corporate CWP 10.204)
- ✓ Emergency Response Procedures (Site-specific)
- ✓ Environment Protection Licence (EPL 5412)

1.4. Definitions

Air pollution	the emission into the air of any air impurity			
Air impurity	includes smoke, dust (including fly ash), cinders, solid particles of any kind, gases, fumes, mists, odours and radioactive substances			
Land pollution	placing in or on, or otherwise introducing into or onto, the land (whether through an act or omission) any matter, whether solid, liquid or gaseous: (a) that causes or is likely to cause degradation of the land, resulting in actual or potential harm to the health or safety of human beings, animals or other terrestrial life or ecosystems, or actual or potential loss or property damage, that is not trivial, or (b) that is of a prescribed nature, description or class or that does not comply with any standard prescribed in respect of that matter, but does not include placing in or on, or otherwise introducing into or			
	onto, land any substance excluded from this definition by the regulations.			
Material harm	(a) harm to the environment is material if:			
(s147 of the POEO Act 1997)	(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or			
	(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and			
	(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.			
Noise	includes sound and vibration			
Noise pollution	the emission of offensive noise			
Pollution	water pollution, or air pollution, or noise pollution, or land pollution			
Pollution incident	an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise			



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Water pollution

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

if the matter would, had it been placed in any waters, have polluted or have been likely to pollute those waters.

Waters

the whole or any part of:

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

1.5. Duty to report a pollution Incident - Requirements of an EPA licence

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555



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Note: The licensee or its employees must notify all relevant authorities of incidents

causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part

5.7 of the Act.

R2.2 The licensee must provide written details of the notification to the EPA within 7

days of the date on which the incident occurred.

1.6 Failure to Report a Pollution Incident

Maximum penalties under the Act:

a) in the case of a corporation - \$2,000,000 and, in the case of a continuing offence, a further penalty of \$240,000 for each day the offence continues, or

b) in the case of an individual - \$500,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues.

2. Risk assessment

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

2.1. Risk register

The potential hazards which have been identified for site include:

- ✓ spills (e.g. Hydrocarbon, hazardous chemicals etc.) resulting in land contamination;
- ✓ spills (e.g. Hydrocarbon, hazardous chemicals or sediment laden water etc.) resulting in water contamination
- ✓ major water discharge off site (for example sediment pond failure)

The likelihood of hazards to human health or the environment has been captured in the site risk register (refer to Appendix A). Included in the risk register also includes details of the following:

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

2.2. Inventory of pollutants

All chemicals at the Charbon site are included in a Chemical Register set up in InfoSafe.

The following potential pollutants identified in the risk register, are either kept on the premises or are used in site operations. These materials are in constant state of variation as a result of site operations.



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Pollutant	Maximum quantity held onsite
Diesel (near Hydrator area)	2,000 litre tank currently not being used and is empty
Diesel (near coal mill area)	5,000 litre tank currently not being used and is empty
Diesel (near coal shed area)	40,000 tank currently not being used and is empty
Oil/Diesel (near coal shed area)	4,000 litres currently not being used and is empty
Diesel (Pod for Vehicle)	200 litres
Waste Oil (near coal mill/cooler area)	4,000 litres currently not being used and is empty
Product produced (Quicklime)	Shed can hold approximately 8,000t
Water (Settling Pond)	390m3
Hazardous goods store – miscellaneous liquid chemicals	40L
Small workshop – miscellaneous liquid chemicals	
Oxygen	8 Bottles
Large workshop – miscellaneous liquid chemicals	1000L
Laboratory – Miscellaneous liquid chemicals	
Hydrochloric Acid	25L

2.3. Site plan

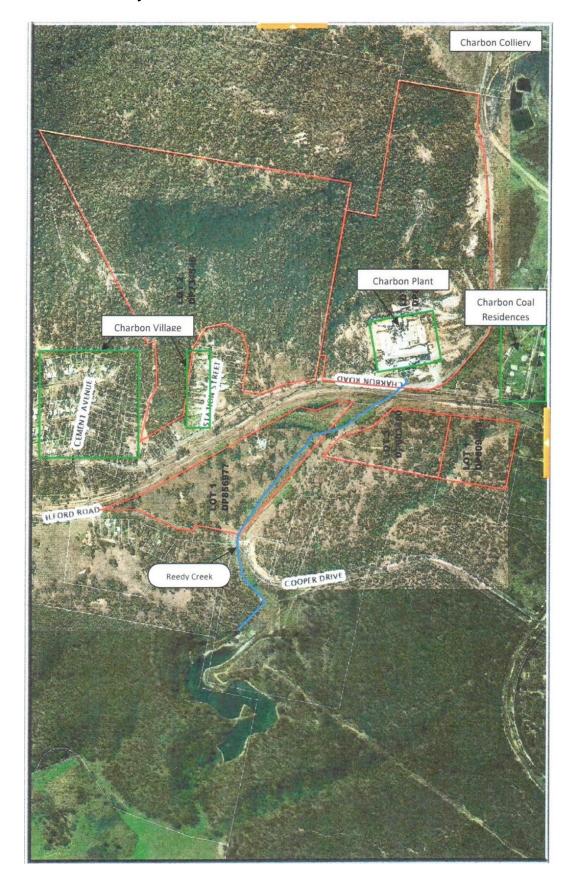
The following site plans illustrate the location of Charbon, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises, the location of stormwater drains on the premises and evacuation muster points.



Charbon Boundary

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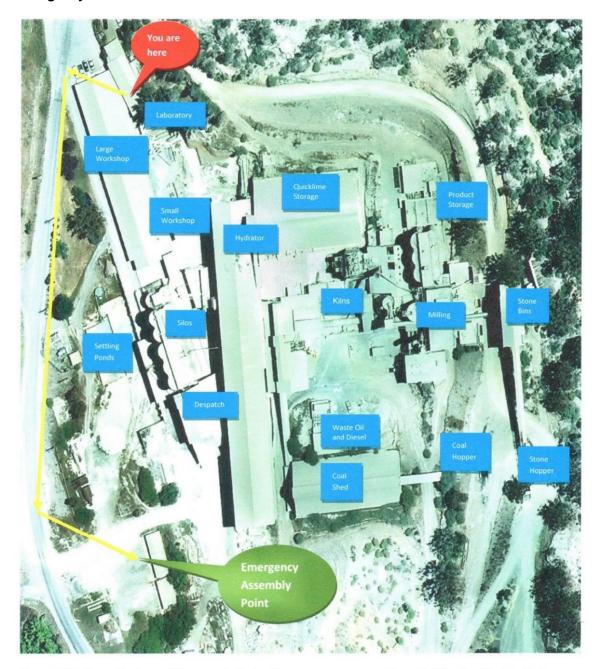
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Emergency Evacuation Point and Location of Pollutants



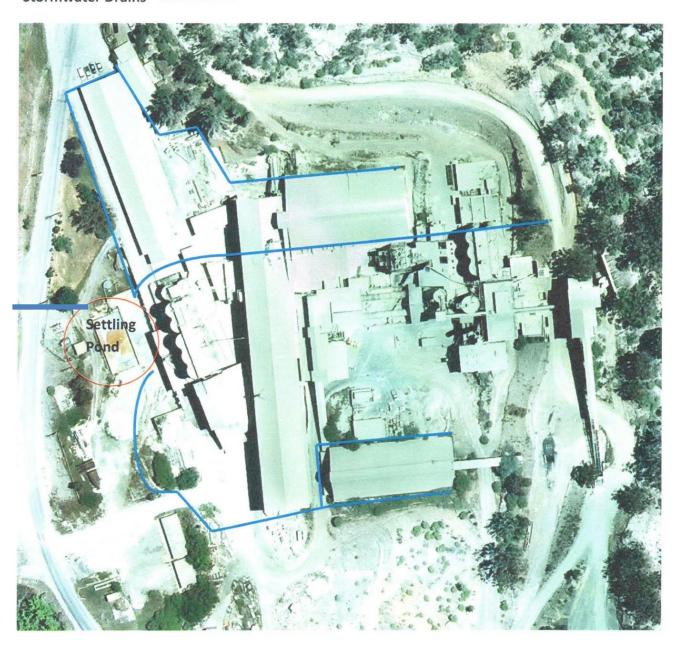
Green Voice box at bottom of the page indicates the emergency evacuation point for the site. The Red Voice Box indicates your position within the plant. The Yellow arrows indicate the best path to the evacuation point. Alternatively take the quickset and safest route if Yellow is not possible.

Charbon Manufacturing Plant - Office / Admin



Stormwater Drains

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3. Pollution incident response

3.1. Immediate response

3.1.1 Minimising harm

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

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

(i) Control the source of the incident

Controlling the source may include actions such as operational shutdown of equipment and activation of shut-off valves.

(ii) Contain the incident

Containing the incident may include the deployment of spill response kits or the activation of evacuation procedures (refer to section 3.2 below).

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

Equipment	Location of equipment
PPE (Personal Diphoterine Solution, PAR's, Safety Goggles, Face Shields, Gloves, Boots, Helmets, Hi Vis Clothing)	Mandatory on personnel, Additional/replacement PPE available from site Administration Office.
MSDS	Office, Laboratory, Workshop Crib Room, Kiln Control Room.
Fire suppression/extinguishers	Located in all mobile plant, fixed plant, workshops and office buildings
Portable Gas Monitoring Devices	Administration Office

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

Equipment	Location of equipment
Spill Response Equipment	Workshop and Kiln Area
Dust suppression	Suppression sprays fitted to fixed plant (conveyors). Water cart (mobile) stored outside store area, and water sprays along road.
Earth moving equipment	Front End Loader and Bobcat on site

3.1.2 Incident classification

Incident classification will be undertaken using the Incident Classification Table (refer to Appendix A). This table is sourced from Graymont Company Wide Procedure CWP-10.202 EHS Incident Notification and Investigation.



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3.1.3 Internal and determination of material harm

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

The Operations Manager shall immediately after being notified of the pollution incident, consult with the site HSEQ and/or Graymont Environmental Advisor to immediately determine if the incident can be classified as a 'material harm incident', i.e. Considered to be causing or threatening material harm as defined in Section 147 of the POEO Act.. In the event that the HSEQ and Environmental Advisor cannot be contacted, the Regional Manager shall consult with the relevant Environment or Health & Safety Manager.

If it is assessed that the pollution incident has caused or threatens material harm to the environment, notification under the PIRMP should be immediately implemented. The agencies listed in the Charbon Public Notification Procedure are contacted.

Authority	Contact number		
Fire and Rescue NSW	000 (To be contacted first if the incident presents an		
	immediate threat to human health or property and		
	emergency services are required, or last if emergency		
	response is not required)		
	1300 729 579 is a new number for industry notification of		
	pollution incidents		
Environment Protection Authority	131 555 or (02) 9995 5555		
Ministry of Health via Bathurst	0428 400 526		
Public Health Unit			
Work Cover Authority	13 10 50		
Mid-Western Regional Council	1300 765 002 or 02 6378 2850		

The Operations Manager shall then notify the Regional Manager and the relevant Environment or Health & Safety Manager. Incidents classified at this level will automatically be classified as "high impact incidents". The Rapid Response Management Procedure will therefore be implemented, in addition to the PIRMP.

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

The PIRMP Notification Flowchart can assist with the notification process. Refer to 2CH-P1.108.01

3.2. Evacuation

In order to minimise harm to persons on the premises, the following evacuation procedures will be implemented.

- Call "Emergency, Emergency, Emergency" over the UHF Radio Channel 9
- Everyone to maintain radio silence
- Everyone to make their way to the Emergency Muster Point (employee car park opposite Bagging Plant) – as long as it is safe to do so



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- · Get your name marked off
- Once there follow the directions of the incident controller

3.3. Notify stakeholders

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

The process in determining whether or not the community is to be notified depends on the type of pollutant, the volume of the pollutant and its potential to impact on the community.

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

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

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

3.4. Clean-up

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

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

3.5. Response personnel

The personnel responsible for incident response are as follows:

Position	Name	Contact	Responsibility		
Operations Manager	Wayne Wolfe	0263 794423 0417 498 830	 Responsible for authorising the PIRMP and all subsequent changes or updates Responsible for ensuring adequate resourcing for the implementation of the PIRMP Authorised to liaise with the relevant authority Responsible for coordinating the response to a pollution incident Facilitate site personnel in implementation of the PIRMP. 		
Regional Manager	Geraint Mathias	0419 703 201	Authorised to notify relevant authorities.		
Supervisors	Martin Lee	0400 626 551	 Report all pollution incidents immediately to the Operations Manager, HSEQ or Env Advisor. Responsible for coordinating the response to a pollution incident 		



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Position	Name	Contact	Responsibility
			Facilitate site personnel in implementation of the PIRMP
HSEQ Specialist and/or Environmental Manager	Cheryl Slapp	0263 794423 0437 110 263	Responsible for undertaking notification as defined in this PIRMP
	Don Cheong	02 9458 2921 0427 525 790	Responsible for coordinating the response to the pollution incident
			 Responsible for arranging testing and updating of the PIRMP
			Responsible for ensuring communication & training of site personnel in the PIRMP
All personnel			Report any potential pollution incidents immediately to Supervisor
			Where appropriate take immediate action to control or contain the incident.

4. Training and testing

4.1. Pollution incident response training

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

4.2. PIRMP testing

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

The PIRMP will be tested on an annual basis and also within one month of any pollution incident causing or threatening material harm to the environment occurring.

Routine testing will be undertaken in the form of either desktop simulations or practical exercises or drills.



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APPENDIX A

Incident Classification Table

Refer to Corporate Procedure CWP 6.000 Risk Management



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Appendix A: Risk Analysis Tools

	Environment and Community	Health and Safety	Financial
Catastrophic	 Permanent impacts to populations of rare or threatened flora or fauna; or Adverse impacts (i.e. damage, destruction or removal) to a state or nationally listed indigenous or non-indigenous heritage item; or Complete removal of habitat of threatened species; or Significant impairment of ecosystem function; or Multiple negative media reports; or Legal action initiated by member of the community. 	One or more fatalities	• >\$1M business impact
Major	 Removal, destruction or loss of whole populations of common native flora and/or fauna; or Adverse impacts to non-listed or locally significant indigenous or non-indigenous heritage items; or Negative media report or multiple community complaints. 	Injury or illness that requires hospitalisation and/or results in permanent impairment	• \$100k-\$1M business impact
Moderate	 Loss of individual member of rare or threatened species; or Extensive impacts on soil, air or water that requires coordinate clean-up; or Offsite discharges/emissions outside of advised levels (e.g. license limit, or environmental advisor / consultant advice) or; Individual community complaint 	Injury or illness more severe than a sprain, strain or superficial wound that requires medical treatment and/or a temporary work restriction (e.g. breaks, fractures, lacerations, burns, torn ligaments)	• \$50-100k business impact
Minor	 Contamination of any on-site water body or impacts on soil and air quality beyond immediate work area but contained onsite; or Loss of individuals of common (not threatened) native flora or fauna. 	Sprain, strain, or superficial wound (i.e. bruise, cut, abrasion) that requires medical treatment and/or a temporary work restriction	• \$10-50k business impact
Insignificant	Direct impacts on soil or air within immediate work area and immediately cleaned up with no residual contamination.	Injury or illness that requires no more than first aid treatment and no work restriction	• \$5-10k business impact

Graymont Consequence Criteria



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Description	Guidance This is a subjective judgement based on your knowledge and experience; simply make your best estimate.
Almost Certain	The consequence is expected to occur. Eg >85% probability of occurring within the context of the risk assessment
Likely	The consequence will probably occur. Eg 25% to 85% probability of occurring within the context of the risk assessment
Occasional	The consequence might occur. Eg 10% to 25% probability of occurring within the context of the risk assessment
Unlikely	The consequence probably won't occur. Eg 1% to 10% probability of occurring within the context of the risk assessment
Rare	The consequence is very unlikely to occur. Eg <1% probability of occurring within the context of the risk assessment

Graymont Likelihood Criteria

	CONSEQUENCE						
L		CATASTROPHIC	MAJOR	MODERATE	MINOR	INSIGNIFICANT	
	ALMOST CERTAIN	25	23	20	16	11	
K		High	High	High	Medium	Medium	
	LIKELY	24	21	17	12	7	
E		High	High	Medium	Medium	Low	
L	OCCASIONAL	22	18	13	8	4	
		High	Medium	Medium	Low	Low	
	UNLIKELY	19	14	9	5	2	
Н		High	Medium	Low	Low	Low	
0	D.A.D.F.	15	10	6	3	1	
0	RARE	Medium	Low	Low	Low	Low	
D							

Graymont Risk Matrix



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APPENDIX B

Environmental Impact and Hazard Register



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Charbon Environmental Impact and Hazard Register

Cnar	bon Environmental Impact and	Hazard Register			
Key	Environmental Hazards	Controls			ıal
			L	С	R
Air (Quality Excessive dust emissions	 Review results and monitoring program of baghouse Water cart/spraying Minimise disturbed areas Stop dust generating activities as necessary Dust minimisation training Maintenance of dust control equipment 	Unlikely	Minor	5 Low
2	Health issues off site	 As per (1) Complaints line Issue monitoring results Communicate construction activities to neighbours plus potential for dust 	Rare	Moderate	6 Low
3	Equipment exhaust emissions exceed EPA limits	 Inspect baghouse emissions regularly All equipment is serviced and maintained to requirements Excessive emissions to trigger procedures 	Rare	Minor	3 Low
Gro	und Water				
1	Groundwater contamination	 Implement monitoring and response plan Ensure storage, handling and transport of dangerous goods are conducted in accordance with Australian Standards Identify, classify, quantify and appropriately store hazardous waste Develop and implement oil and fuel spillage controls Ensure hazardous waste is minimised Licenced contractors to remove hazardous waste from site Keep records of all hazardous waste movements Develop and implement oil and fuel spillage controls Implement bunding to appropriate areas Ensure adequate spill kits are available on site including adequate training Minimise hazardous waste storage quantities on site 	Rare	Moderate	6 Low
Sur	face Water				
1	Discharge of sediment	 Develop and implement Water Management Plan Implement Monitoring Program Review monitoring results and action as necessary Implement dust control procedures as per AIR 	Unlikely	Moderate	9 Low
2	Discharge of hazardous materials	 As per Surface Water (1) Ensure storage, handling and transport of dangerous goods are conducted in accordance with relevant Australian Standard Review monitoring results and action as necessary Identify classify, quantify and appropriately store hazardous waste Develop and implement oil and fuel spillage controls Implement bunding to appropriate areas Ensure adequate spill kits are available on site including adequate training for effective use Minimise hazardous waste storage quantities on site Appropriate location of hazardous materials storage areas to prevent off-site discharges 	Rare	Moderate	6 Low



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Key Environmental Hazards		Controls	Residual Risk		
			L	С	R
Lar	Spill of liquid fuel whilst in storage	 Fuels stored according to Charbon's bunding requirements. Measures in place to ensure spills do not leave site boundaries i.e. diverting flow away from boundaries, stormwater drains. Bunding subject to regular inspection and maintenance 	Unlikely	Minor	5 Low
2	Spill during delivery of fuel to mobile equipment	 Drivers stay with vehicle during refuelling Emergency spill kits located near fuel delivery vehicles Spill response equipment is regularly inspected and maintained Drivers trained in spill response procedures Refuelling takes place in designated refuelling areas 	Unlikely	Minor	5 Low
3	Spill during delivery of fuel to storage tank	 Supplier's fuel transfer procedure is known Fuel transfer is supervised against supplier's procedure 	Unlikely	Minor	5 Low



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APPENDIX C

Public Notification Procedure

Refer to 2CH P1.108.01 Charbon Public Notification Procedure



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APPENDIX D

Stakeholder Contact List



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 Stakeholder
 Contact

 Centennial Coal Colliery
 6379 4255

 Centennial Coal Owned Residences
 Door knocking



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APPENDIX E

Site Evacuation Procedure



EMERGENCY PROCEDURES

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IN AN EMERGENCY TELEPHONE: WHEN YOU DIAL THE EMERGENCY NUMBER:

FIRE BRIGADE 000

POLICE 000

AMBULANCE 000

NUMBER:

Advise location –

Graymont Charbon Plant, Charbon Rd, Charbon

NSW 2848
• Provide your name & telephone number and any other information requested by the

operator 63794423

IN ALL CASES OF EMERGENCY ADVISE YOUR IMMEDIATE SUPERVISOR

EVACUATION PROCEDURES

If in immediate danger

- 1. On hearing the emergency, emergency, emergency signal over UHF radio, if it is safe to do so, secure your workplace and evacuate the building via the nearest exit and proceed to the assembly area (employee carpark) in an orderly manner.
- 2. Do not enter return to your place of work unless advised to do so.
- 3. Assembly area is employee car park

KNOW YOUR EXITS



FOR YOUR SAFETY, MAKE SURE YOU KNOW THE LOCATION OF THE NEAREST EMERGENCY EXIT, EMERGECY EVACUATION POINT FOR THIS SITE IS LOCATED IN THE STAFF CAR PARK.

FIRE EXTINGUISHERS

IF SAFE TO DO SO

Select the correct extinguisher



- 1. Remove from the bracket
- 2. Carry to the scene of the fire
- 3. Whilst clear of fire remove pin and test extinguisher
- 4. Proceed to fire and initially from a distance of no closer than 2 metres direct agent at the base of fire

Trained Fire wardens

- 1. All Process Operators
- 2. All Maintenance Operators
- 3. When on day shift the Administration Assistant, Kiln operator is to take the sign in book to the emergency assembly point and mark off who is in attendance.
- 4. Operations Manager
- 5. Maintenance Supervisor
- 6. Production Supervisor
- 7. HSEQ Specialist

2CH-P10.201.01 Emergency Response Plan