POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

QP-PKGT-E-PN-02

Version Control

Date	Version	Reason for Change	Change Made By
15/02/2016	0	First Issue	
30/12/2016	1	Spare Parts Store replaced by Workshop and Sample Containers	D. Ladmore
04/04/2017	2	Review with EPA	D. Ladmore
26/09/2017	3	Inclusion of Fumigation TARMP	D. Ladmore
12/10/2018	4	Further review with EPA	D. Ladmore
28/04/2020	5	Diesel Refuelling Tank Added	F.Chiodi
24/03/2022	6	Removed MyOsh references. Updated Terminal and Operations Manager contacts.	D.Laurence
07/04/2025	7	Update contacts; update App 3 Risk Register; update SDS Register	S Davies

Testing of the Plan History

Date	Description/Scenario Tested	Test Conducted By
13/03/2017	Desktop review with EPA	D.Ladmore
13/09/2018	Fumigation Breach (Exercise)	F.Chiodi
14/06/2019	Desktop review of Emergency Evacuation Plan	F.Chiodi
18/08/2021	Desktop review of Emergency Evacuation Plan	D.Laurence
May 2022	External review of PIRMP	Umwelt (D.Sullivan)
March 2023	Desktop review of site oil spill	D Allen
April 2024	Desktop review of Emergency Evacuation Plan	D Allen
April 2025	Desktop review of site oil spill	D Allen; G Georges; S Davies

Contents

List of Appendices

1. Purpose and Background

This Pollution Incident Response Management Plan (PIRMP) has been developed in accordance with the *Protection of the Environment Operations Act 1997* (POEO Act) and associated *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). This document is to be read in conjunction with the sections of the Australian Amalgamated Terminals (AAT) PIRMP relevant to Berth 103.

The Protection of the Environment Legislation Amendment Act 2011 (POELA Act) was introduced resulting in changes to the Protection of the Environment Operations Act 1997 (POEO Act). The intent of the POELA Act is to improve the way pollution incidents are reported and managed. Provisions include a requirement for holders of Environmental Protection Licences (EPLs) to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

This PIRMP has been developed to satisfy pollution reporting obligations under the POEO Act. This plan outlines the classification, testing, reporting, and management requirements of an environmental pollution incident. The objective of this plan is to ensure an environmental pollution incident is communicated to all relevant groups and individuals, to prevent, minimise and control the risk of an environmental pollution incident, and also, appropriately establish and maintain the plan.

This document has been designed as a reference to existing emergency response plans and other relevant procedures. It also details additional supplementary site specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (See attached at Appendix 1).

2. Scope

This PIRMP covers all of activities/operations on the Quattro Ports Port Kembla Grain Terminal (PKGT) site, as outlined in the site map provided in Appendix 2.

3. Regulatory Requirements

The specific requirements for PIRMPs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this legislation requires the following:

- All 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(G) Regulation (clause 98C) and be in the form required by the POEO(G) 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 in accordance with the POEO(G) (at least every 12 months and after a pollution incident) in accordance with the POEO(G) Regulation (clause 98E); and

- If a pollution incident occurs during an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

4. Stakeholders

Quattro Ports PKGT resides on land owned by NSW Ports. Some of this land, for example Lot 303 Tom Thumb Road Port Kembla, is leased to AAT and then sub-leased to Quattro Ports. Quattro Ports will engage service providers to undertake activities on the site, including maintenance and stevedoring.

5. Definition of a Pollution Incident

A pollution incident "means an incident or set of circumstances during or as a consequence of which there 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 a 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' (refer section 147 of the POEO Act) and industry is required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council.

6. Environmental Protection Licence (EPL)

Quattro Ports PKGT holds an EPL for the Scheduled Activity – Shipping in Bulk. The EPL number is **20532** and is attached in Appendix 1.

7. General Description of Main Terminal Functions

A site layout showing all of the main Quattro Ports PKGT terminal functions is provided in Appendix 2.

7.1 Rail Receival

The Rail Unloading Facility is located at the main AAT Terminal and accommodates trains of up to 40 bottom dump rail wagons with some shunting required to position all wagons in the facility for dumping. Access to clean the hopper and transfer system between train headings is necessary as the facility handles different products and cross contamination of products is not acceptable. After a sample analyser measures grain quality including protein, moisture and falling number. Grain is then elevated from the rail hopper(s) and transferred to the overland belt conveyor system.

7.2 Overland Transfer Conveyer System

The Overland Transfer Conveyer System is an elevated belt conveyer network transferring grain from the Rail Unloading Facility at AAT's main terminal to the Grain Storage Area – approximately 700m long.

All conveyers have a southern side walkway as a minimum (for ease of cleaning and inspection during operations and maintenance) and all conveyors and conveyer transfer points are covered to prevent spillage, dust emissions and weather ingress. Sections of the conveyer system include over belt magnets for the removal of foreign metal matter from the product.

The overland transfer conveyer system feeds into a batch weigh tower to in-weigh all grain into silo storage.

7.3 Road Receival

The Road Receiving Facility caters for B-Double trailers with a grain capacity of approximately 44 tonnes per vehicle. After the weighbridge station, sampling is undertaken before grain is tipped into the road dump hopper. As for the Rail Unloading Facility, the Road Receiving Facility has ample access to clean the hopper and transfer system to prevent cross contamination of products and a static screen and magnet is installed to remove foreign matter from the product. Grain from the road hopper(s) is transferred to silo storage via the southern reclaim belt.

7.4 Silo Storage

7.4.1 Staging Silos

The nine staging silos are fed via in-feed fixed transfer conveyers and reclaimed to the respective reclaim belt conveyers during shiploading or internal transfer. The staging silos are fitted with fumigation and aeration equipment (as well as blending capability). Discharge from the staging silos is facilitated by the conical base of each silo.

7.4.2 Main Silos

The eight main silos are fed via in-feed fixed transfer conveyers and reclaimed to the respective reclaim belt conveyers during shiploading or internal transfer. The main silos are fitted with fumigation and aeration equipment. A discharge floor sweep system is used to ensure the flat bottom of the main silos are sufficiently emptied during discharge.

7.5 Shiploading

After passing through the out-weigh tower, grain is transferred onto a set of link conveyers that link the outload system to the portable shiploader where grain is elevated up to the boom that reaches out over the vessel hold. The shrouded chute on the end of the boom is extendable all the way to the bottom of the ship's hold and ensures that the grain is covered through the duration of the loading process. The shroud is also connected to a dust extraction system and the negative pressure in the shroud drags dust back up through the system rather than pushing it out the end of the chute.

7.6 Fumigation

Fumigation is required from time to time at the PKGT based on the requirements of the export permit or if the grain be infested with insects/bugs. The fumigation process, including ventilation, takes some time to ensure boundary methyl bromide ground level concentration does not exceed boundary limits.

7.7 Ancillary Functions

Ancillary activities are undertaken at the following locations within the Quattro Ports Grain Terminal:

Office – includes the terminal control room and accommodates up to six management and admin staff.

Laboratory – automatically receive samples from inbound rail and road grain deliveries. The laboratory contains sampling carousels, sampling tables and testing areas and is located adjacent to the elevator tower.

Weighbridge – is situated just outside the office and weighs both inbound and outbound grain b-doubles trucks.

Cargo Shed – is used to store imported bulk cargo or plant & equipment. The cargo shed can be weather sealed by closing all ten roller doors: and

Workshop and Sample Containers – are located adjacent to the Laboratory and are used predominately for the storage of equipment, tools, parts, and samples.

There is not a dedicated wash bay on site.

8. Description & Likelihood of Hazards and Pre-emptive Actions

Safety, Health & Environment Hazards are diligently managed and administered at the Quattro Ports PKGT.

A Fumigation Trigger Action Response Management Plan (TARMP) details the actions taken by Quattro Ports (automated and manual intervention) as a response to fumigation sample results during silo purging. The TARMP is attached to this PIRMP as Appendix 6 (Refer *Fumigation Trigger Action Response Management Plan (TARMP)* QP-PKGT-E-PN-02.FT-01).

With regards to potential water contamination via stormwater discharge, relevant maps indicating stormwater discharge points are provided in Appendix 3.

Impact	Conditions / Events that may increase likelihood
Airborne grain dust	High winds, product with high dust content, ineffective dust control

Methyl bromide emissions > target	Low winds, ineffective maintenance, human error
Polluted waters	Extreme weather conditions
Noise emissions	Ineffective maintenance
Airborne odour	Irregular hygiene
Waste generation	Ineffective recycling program

Table 1 – Conditions/Events that may increase the likelihood of Environmental Impacts from occurring

9. Inventory of Potential Pollutants

Quattro Ports has a Safety Data Sheet (SDS) register within its Safety, Health, Environment and Quality Management System (refer QP-PKGT-S-RG-02 *Safety Data Sheet Register*) for detailing the Quattro Ports PKGT potential pollutants.

Additionally, the following list details the major potential pollutant groups and how they are managed on site.

Waste Oil: All Waste Oil generated is stored in drums in a bunded area and recycled in accordance with the Quattro Ports *Waste Management Register* QP-PKGT-E-RG-01.
Waste Grain (as grain or dust): All Waste Grain generated is collected in designated bins and recycled in accordance with the Quattro Ports *Waste Management Register* QP-PKGT-E-RG-01.
Stormwater: Stormwater is processed through a triple interceptor before clean water is discharged to the harbour.
Wash down water: All wash down of equipment is done on clean, hard surfaces behind bunding to prevent contamination to drains.
Diesel Refuelling Station: Diesel is stored in a 1200 l poly diesel tank on a bunded trailer.

These major potential pollutant groups as well as the surrounding area likely to be affected by a pollution incident are shown in Appendix 7.

10. Safety Equipment

Safety Equipment used to minimise the risks to human health or the environment and importantly to control or contain a pollution incident is identified on the Quattro Ports PKGT Site Map (refer QP-PKGT-S-PN-02.PN-01 *Quattro Ports PKGT Site Map, a* copy of which is current at the time of publication, is attached to this PIRMP as Appendix 4). Additional Safety Equipment is listed in Table 2.

Safety Equipment Item	Site Location
PPE: • Safety Helmets • Safety Glasses • Safety Vests • Respirators	Main Office
Gas Monitors	Main Office, Sample Lab
Scissor Lift	West side of Cargo Shed
Bobcat	West side of Cargo Shed
Front End Loader	Cargo Shed
Rope Booms	West side of Cargo Shed
Shovels, Brooms, Pool Scoop	Equipment Container

Table 2 – Inventory of Additional Safety Equipment

11. Contact Details and Communicating with Neighbours

Table 3 lists the Quattro Ports personnel who are responsible for activating and coordinating this plan:

Key Contact	Role	Function	Contact Details
Shift Supervisor	Terminal Emergency Coordinator (TEC)	Activate the plan Notify first responders	0497 075 821
David Allen	Terminal Manager – assist	Notify Authorities and Regulators, notify neighbours, stakeholders	0408 942 140
Kayleb Gatt	Operations Manager (delegated Terminal Manager)	As for Terminal Manager	0434 240 072

Table 3 – Quattro Ports Key Personnel

An Emergency Contact List inclusive of 24hr Quattro Port's responsible person/s, neighbours and external agencies is used by Quattro Ports in the case of an emergency event. A copy of the list, current at the time of publication, is attached to this PIRMP as Appendix 5 (Refer *Emergency Contact List* QP-PKGT-S-PN-02.FM-01).

Due to the industrial location of the facility and significant distance from residential areas (approx. 1.5km), Quattro Ports does not believe its operations pose a significant pollution risk to local residential communities. In the event of a localised incident, Quattro Port's industrial neighbours, for example, Port Kembla Coal Terminal (PKCT) will be contacted by telephone or email in accordance with the Emergency Contact List. Regular updates will be provided by the Terminal Manager.

12. Minimising Harm to Persons

QP-PKGT-S-PN-02 *Emergency & Evacuation Plan* details the evacuation arrangements to be initiated to minimise the harm to any persons on the premises should an incident occur

13. Actions to be taken during or immediately after a Pollution Incident

QP-PKGT-S-PN-02 *Emergency & Evacuation Plan* details the emergency actions to be initiated to reduce or control any pollution.

A Quattro Ports employee will, as soon as practicable after it becomes aware of a pollution incident, notify the NSW EPA of the incident (Refer *Emergency Contact List* QP-PKGT-S-PN-02.FM-01) and all relevant information about it, including:

- the time, date, nature, duration, and location of the incident,
- the location of the place where pollution is occurring or is likely to occur
- the nature, the estimated quantity or volume and the concentration of any pollutants involved,
- the circumstances in which the incident occurred (including the cause of the incident, if known),
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, and
- other relevant information, as required.

14. Staff Training

Quattro Port's employees, contractors and visitors are provided with a level of Environmental Awareness Training consistent with the needs of their roles within Quattro Ports PKGT. Examples of training forums include toolbox talks (daily), staff training days (annual), and undertaking simulated incident exercises, including with external emergency services (annual). Training is provided so that all personnel understand their roles in relation to a pollution incident to minimise the harm to human health and the environment. Records are maintained in the Quattro Ports SHEQ Management System of all training undertaken.

15. Making this Plan Available

A copy of the most up to date PIRMP is available:

- In the Quattro Ports PKGT main office
- On the Quattro Ports website www.quattroports.com.au

16. Testing and Maintenance of this Plan

This PIRMP is tested annually in the form of:

1) a desktop or practical exercise to ensure the information it contains is both accurate and up to date, and that it is capable of being implemented in a workable and effective manner. The outcomes of all exercises are recorded in the Quattro Ports QMS; or
2) a desktop review of this plan – either internally, or with relevant stakeholders (for example, EPA)

This Plan will also be reviewed in the event of an incident, change to process or audit finding.

The Plan will be maintained in accordance with the Quattro Ports *Document Control and Record Keeping* procedure QP-Q-PR-01.

Appendix 1. Quattro Ports Environmental Protection Licence # 20532

This licence is issued to:

QUATTRO P RE SERVICES PTY LTD
PO BOX 6063
WOLLONGONG DC NSW 2500

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence regulates water pollution resulting from the activity/ies specified below carried out at the premises specified in A2.

Fee Based Activity	Scale
Shipping in bulk	> 500000.00 T of annual capacity to load and unload

A1.2 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

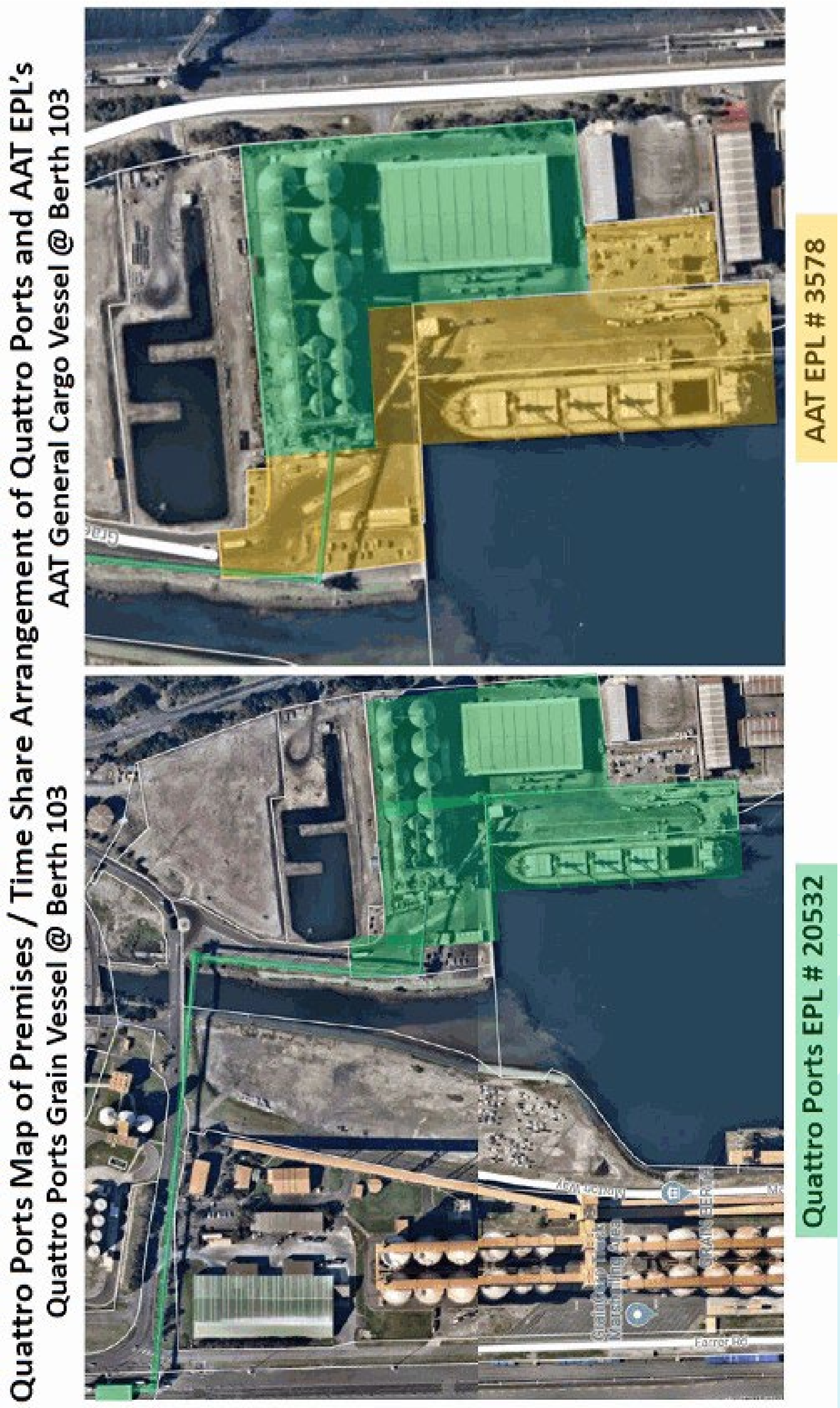
Scheduled Activity	Fee Based Activity	Scale
Shipping in bulk	Shipping in bulk	> 500000 T of annual capacity to load and unload

A2 Premises or plant to which this licence applies

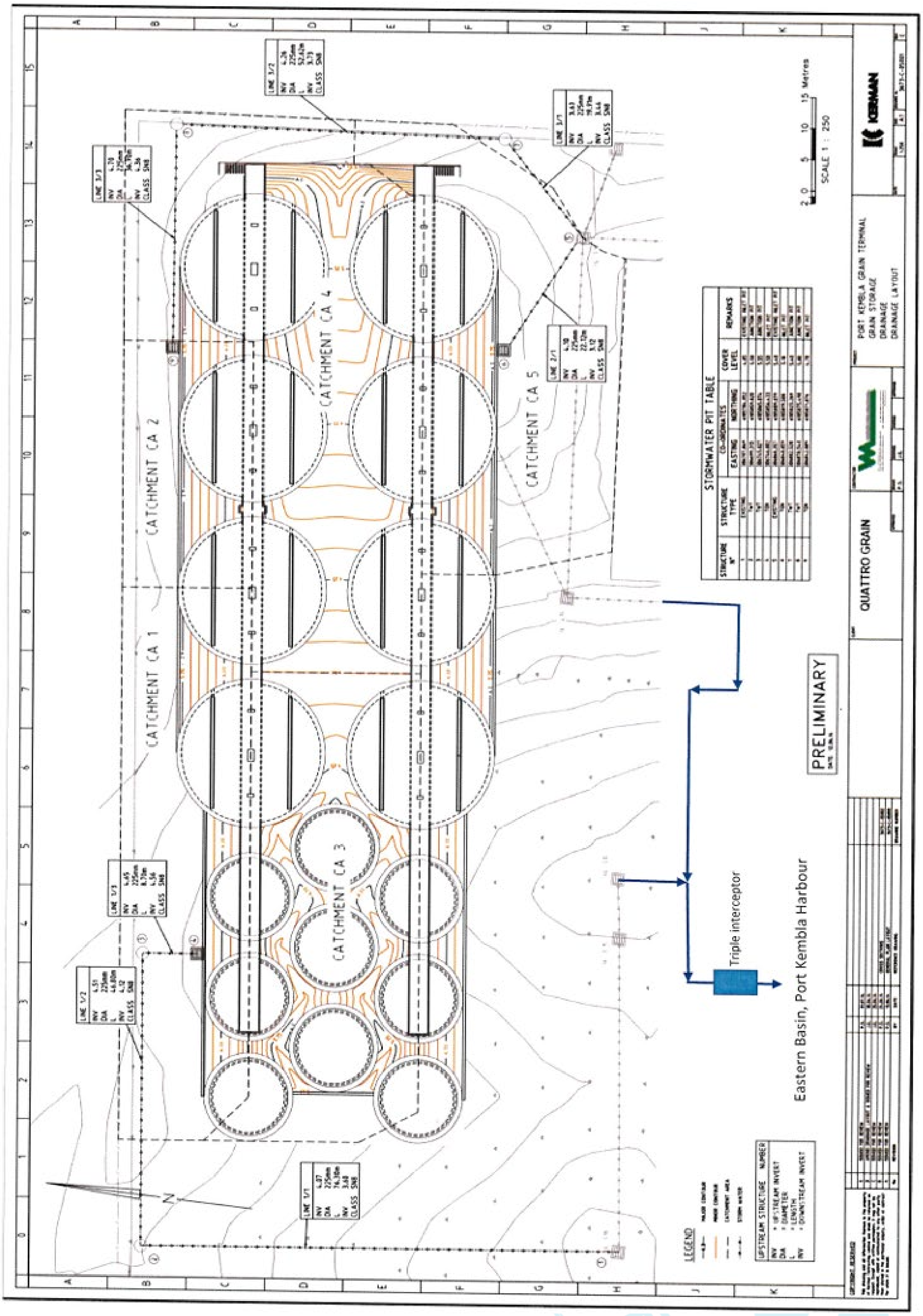
A2.1 The licence applies to the following premises:

Premises Details
INNER HARBOUR PORT KEMBLA
TOM THUMB ROAD
PORT KEMBLA
NSW 2505
PART LOT 10 DP 1127287, LOT 122 DP 1128397, PART LOT 301 DP 1148391, PART LOT 302 DP 1148391, PART LOT 303 DP 1148391, PART LOT 81 DP 1170187, PART LOT 12 DP 1182111, PART LOT 70 DP 1182824

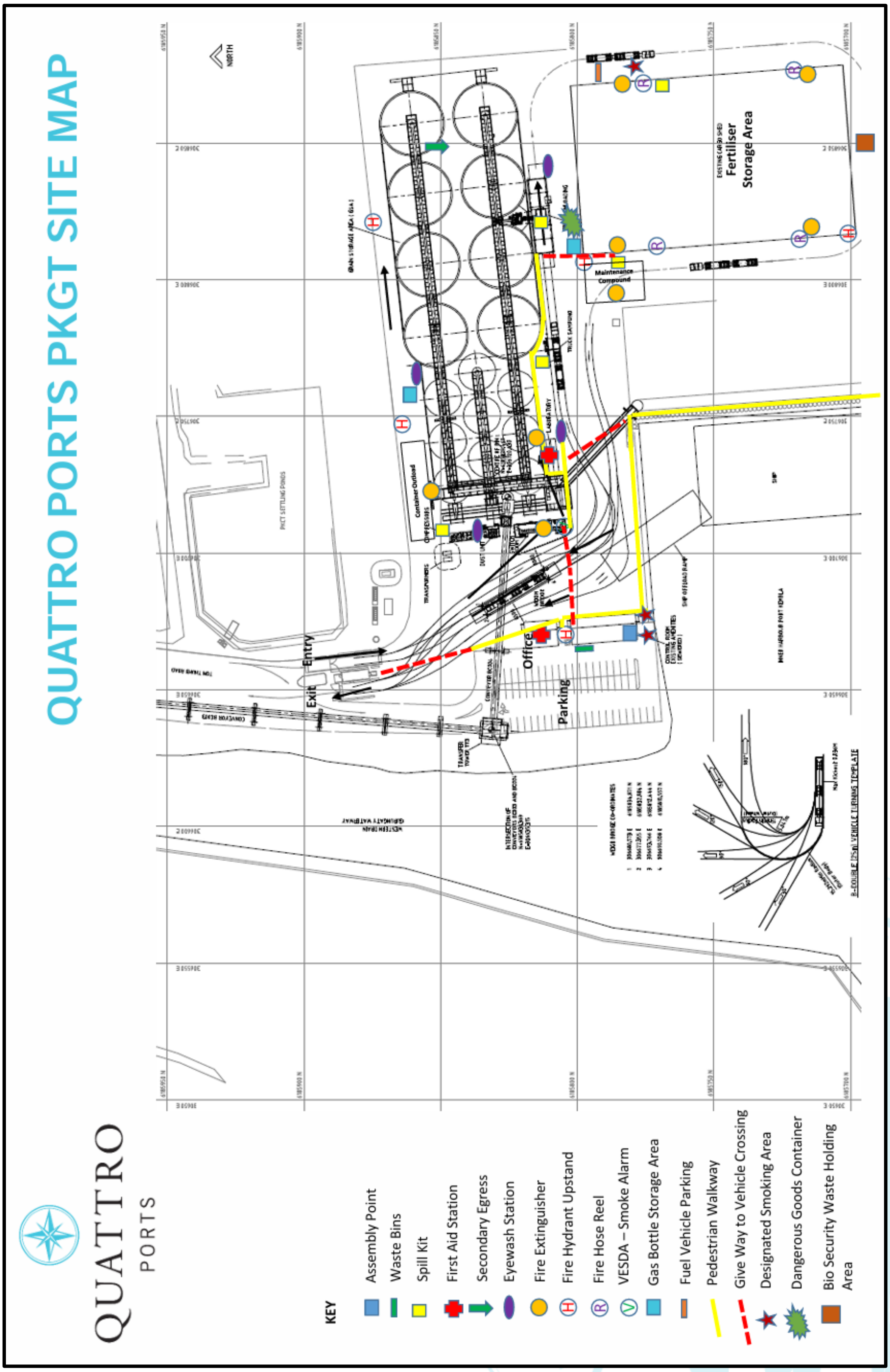
Appendix 2. Quattro Ports PKGT Site Layout



Appendix 3. Stormwater Discharge Points



Appendix 4. Quattro Ports PKGT Site Map



Appendix 5. Emergency Contact List

Emergency Services – Police, Fire and Ambulance	**000**

Quattro Ports/ AAT Contacts:

Terminal Emergency Controller (TEC)	Operations Channel #1 or 0497 075 821
1st Contact- Quattro Ports Terminal Manager (Dave Allen)	0408 942 140
2nd Contact- Quattro Ports Operations Manager (Kayleb Gatt)	0434 240 072
3rd Contact- Qube Agri Manager (Ross Nacey)	0418 767 599
NSW Ports – Tom Thumb Rd Security Gatehouse	02 4225 7935 or 0434 423 933
AAT Security Gatehouse	02 4221 0940
AAT Terminal Manager (Evan Wissell)	0417 069 358

Emergency Contacts: (only to be contacted by Terminal Manager/ Operations Manager):

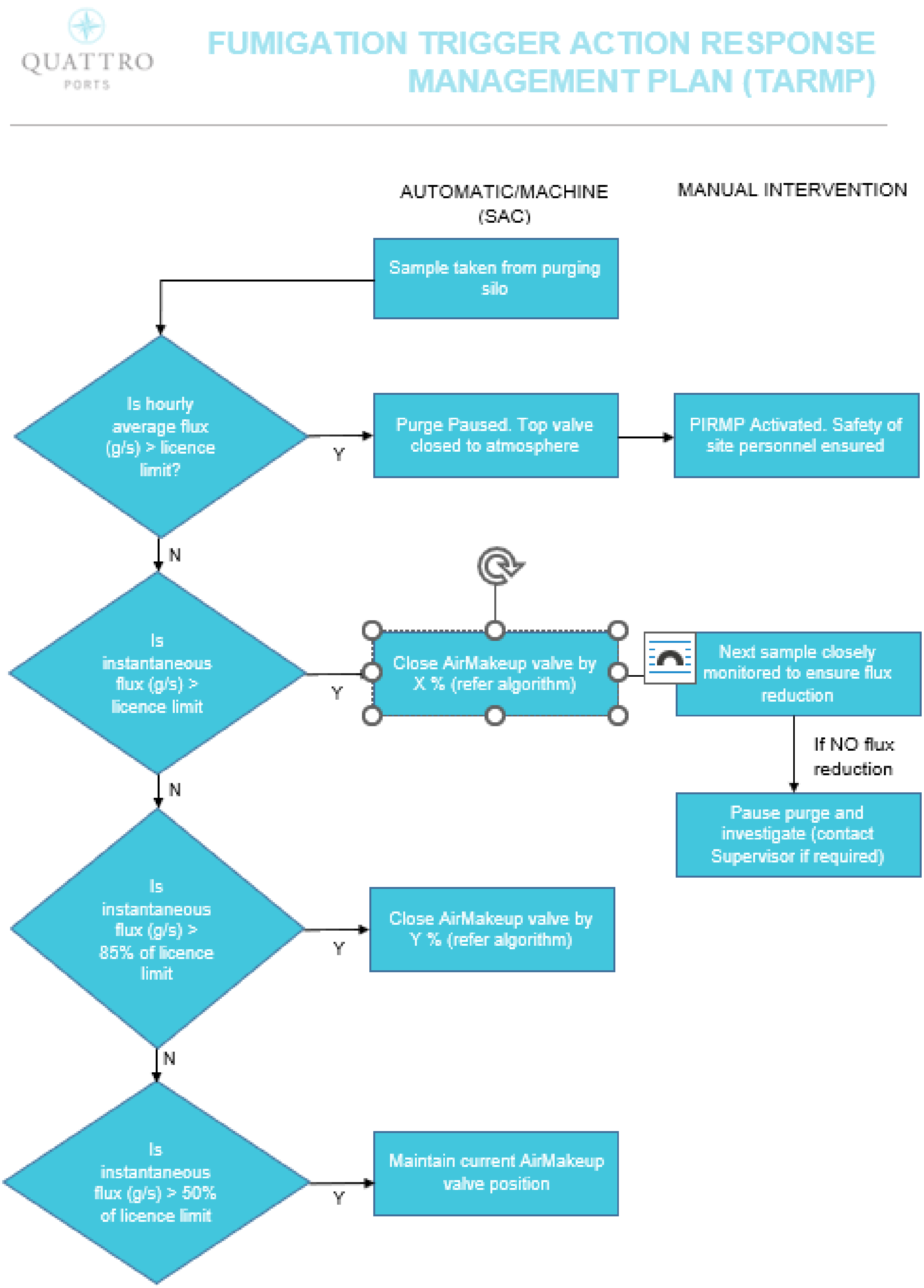
NSW EPA	131 555
WorkCover NSW	131 050
Wollongong Council	02 4227 7111
NSW Health	02 9391 9000
Port Authority of NSW – Port Emergencies, Vessel Traffic Centre	02 4275 0197
Commercial Diving Services	02 4261 4200 or 0403 677 768
Bio Security (http://www.agriculture.gov.au/pests-diseases-weeds/report)	1800 798 636
Endeavour Energy – Electrical Faults	131 003
Sydney Water – Water Leaks	132 090
AusHealth	1800 633 838

Adjoining Neighbours: (only to be contacted by Terminal Manager/ Operations Manager):

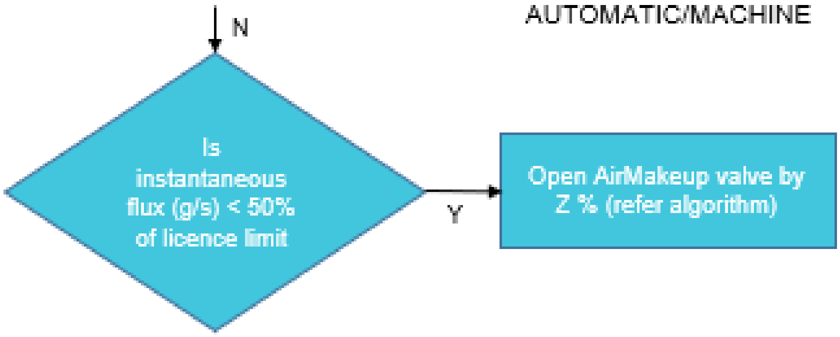
GrainCorp	02 4224 6400
Port Kembla Coal Terminal (PKCT)	02 4221 1834
Pacific National (RIM) – Scott Beddow	02 4253 0726 or 0404 048 859

Note: Those contacts marked green must be notified in the case of a pollution incident.

Appendix 6. Fumigation Trigger Action Response Management Plan (TARMP)



AUTOMATIC/MACHINE MANUAL INTERVENTION



Plant Control System – AirMakeup Valve Control Algorithm

AirMakeup Valve open (%)	Flux Reading (% of licence limit)	Valve Control
Between 0-20%	< 50%	Open by Z = 1%
	>50%, <85%	Maintain valve position
	>85%, <100%	Close by Y = 1%
	>100%	Close by X = 35% for large silo and X = 20% for small silo
Between 21-81%	< 50%	Open by Z = 5%
	>50%, <85%	Maintain valve position
	>85%, <100%	Close by Y = 5%
	>100%	Close by X = 35% for large silo and X = 20% for small silo
At 81%	<50%	Open to 100%
	>50%, <85%	Maintain valve position
	>85%, <100%	Close by Y = 5%
	>100%	Close by X = 35% for large silo and X = 20% for small silo

Appendix 7. Major Potential Pollutant Groups and Surrounding Area

Quattro Ports Neighbours:

A PKCT
B GrainCorp
C AAT
D Auto Nexus
E Inner Harbour Port Kembla

Quattro Ports Major Potential Pollutants:

1 Fumigant (MeBr)
2 Waste Grain
3 Waste Oil
4 Chemical Stores