

Issue date: 28-Aug-2020	 Albright & Wilson Experience Matters	Document No. 758
Authorised by: Technical Manager		HSE

Pollution Incident Response Management Plan

1. PURPOSE & SCOPE:

This document outlines the components of the site emergency management system which relate to pollution incident response, along with public awareness associated with potential pollution incidents.

The plan relates to Albright & Wilson Wetherill Park and its associated activities. This plan was established for notifiable pollution incidents as defined in section 3 and to support existing procedures from Albright & Wilson's emergency management system.

2. HSE STATEMENTS:

This plan is a statutory requirement under the NSW Protection of the Environment Operations Act 1997 Part 5.7A. It is designed to ensure the effective response to pollution incidents, along with providing awareness to the neighbouring community that could be impacted by potential pollution incidents associated with the plant.

3. DEFINITIONS:

EC	Emergency Coordinator - Leading hand or if unavailable the most senior operator acting in the position.
Notifiable Pollution Incident	<p>Pollution incidents causing or threatening material harm. Material Harm means:</p> <ul style="list-style-type: none"> It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial (not minor), or It results in actual or potential loss or property damage of an amount in aggregate, exceeding \$10,000. <p>More information is available in Part 5.7 Clause 147 of the NSW Protection of the Environment Operations Act.</p>

4. ASSOCIATED DOCUMENTS:

- NSW Protection of the Environment Operations Act 1997 Part 5.7A
- Applicable documents are referenced in the plan as required

5. PLAN AVAILABILITY

The plan is available through the following mechanisms

- Externally:
 - Through the Company website on the HSE Wetherill Park homepage
[N09.03.01-Pollution-Incident-Response-Management-Plan](#)
 - Via a written request to the HSE Coordinator.
- Internally:
 - Available in each Emergency Warden Resource Support Station.
 - Electronically stored in the HSE National Directory – Section 9 *Emergency Preparedness and Response* – Sub Section 3 *Wetherill Park*

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6. FACILITY DESCRIPTION

This plan is applicable to the Albright & Wilson site at **21-22 Davis Rd, Wetherill Park, NSW, 2164**

Picture 1 shows a layout of the site. The site is located within an industrial area.

The site operates 24 hours 7 days a week unless there is a planned shutdown period. Personnel on site can range from 2 (outside office hours and in a caretaker role) to 30 (in office hours and full production)

It has a number of plants which manufacture various chemical surfactants and contains storage facilities which include bulk tanks and some warehousing for products and raw materials.

The site generally handles liquid raw material and products. However, there are some activities that generate powders from the liquids produced. The produced powders are not classified as Hazardous Chemicals.

Workcover notifiable hazardous chemicals (NDG 022888) are contained on site and these are listed in the hazardous chemicals manifest.

Note: The site is NOT a Major Hazard Facility.



Picture 1 - layout of the site

7. DESCRIPTION AND LIKELIHOOD OF HAZARDS

Note: The following hazards only relate to potential notifiable pollution incidents as defined in Section 3. Likelihood is based on controls and on the sites history of reportable pollution incidents in at least the last 5 years. A summary of the main pre-emptive actions are noted. Additional actions may also be in place.

Also note that the likelihood of impacting neighbouring sites is reduced as the site operates 24 hours a day with neighbouring sites generally operating during normal business hours.

No.	Hazard	Likelihood	Summary of Main Pre-Emptive Actions
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No.	Hazard	Likelihood	Summary of Main Pre-Emptive Actions
1.	Loss of containment of chemical liquids that may cause environmental damage or personnel safety risk (other than impact from vapours).	Low	Bulk storage vessel and major storage areas have a containment system such as a bund. All process and roadway flow goes through the site effluent system which is controlled by pits and a pumping system. Trade waste is released to Sydney Water under consent limits and conditions. The effluent pond has a capacity of 400kL and its release can be stopped if discharging in an emergency situation. The exception is in rainwater events where the first flush of roadway rain water flow is collected in the two first flush system and pumped to the tradewaste system. Excess rain water goes to the stormwater system. Sample is taken and kept/tested in this scenario. Plant process water goes directly to the trade waste system.
2.	Loss of containment of chemical liquids which may cause environmental damage or personnel safety risk through the release of vapours.	Low	The site has only a small number of toxic chemicals and these have appropriate storage and transfer facilities that limit the risk of unplanned release. Containment systems as noted in hazard 1 are also in place to reduce the potential for the release of liquid to flow off site and impact neighbours. Emergency procedures are in place to evacuate the site and neighbours if required.
3.	Process stack emissions which may cause environmental damage or personnel safety risk through the release of vapours.	Low	The main plant stack is monitored for SO ₂ emissions as per the site EPA licence. A summary of emissions is reported monthly on the company website. The plant control system has a set of alarms which warn if the SO ₂ is above set levels. The site has no other process or stack emissions that could lead to a notifiable pollution incident. Active % and pH is monitored in Drum Dryer Plant Water scrubber liquid. Drum dryer plant has a water scrubber to prevent any powder discharge which is monitored and maintained weekly.
4.	Fire (general) which may lead to environmental damage or personnel safety risk.	Low	The site mainly deals with liquids and the majority of these are not flammable or combustible. Those that are contained in tank farms are away from main process areas. Manufactured powders are not flammable or combustible. Where there is a risk of fire, the organisation has installed fire detection systems. Fire safety measures are as outlined by the Fairfield City Council. Emergency procedures are in place to evacuate the site and neighbouring sites if required. The first flush system is designed to capture fire fighting water that may be generated. A work permit system is in place which includes work associated with hot work.
5.	Fire an Explosion (process reactions) which may lead to environmental damage or personnel safety risk.	Low	Processes are generally automated and procedures in place to reduce the risk of process reactions where fire and explosions could occur. The gas network is compact and contained in the appropriate pipelines and equipment. Emergency procedures are in place to evacuate the site and neighbouring sites if required.

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8. RESPONSE PROCEDURES

Main procedures for the coordination/management of notifiable pollution incidents:

- *Notification of Pollution Incident Procedure*
- *EC Emergency Response & Evacuation Procedure*
- *EW Emergency Response & Evacuation Procedure*
- *Emergency Contact List*

The emergency contact list contains all internal emergency contacts, along with contact details for relevant authorities and neighbouring sites.

Specific incident type procedures and support documents are listed in *N09.03.03 – Listing of Emergency Procedures and Checklists*

Specific incident type procedures include

- Spill Management
- Fire
- Natural Gas leaks
- Etc

Support documents

- Lists spill management equipment
- First aid personnel and equipment
- Fire detection system
- Safety Equipment

8.1 Informing Neighbours in an Emergency

As part of the EC (Emergency Coordinator) Emergency Response & Evacuation Procedure, neighbouring sites will be notified of the emergency and actions to take including evacuation to safe zones if required (See picture 2). The emergency contact list available to the EC contains contact details for neighbouring sites along with relevant authorities.

Neighbouring site have been provided with Albright & Wilson's main contacts in the event of emergency and can contact the company on 1800 814 730 if required.

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9. INVENTORY OF POLLUTANTS

Pollutants are listed in site hazardous chemicals manifest and site map..

Manifests are located on site in the reception area, Base Plant control room and near gate 4. These are shown on the picture 2 below. The hard copy manifest contains SDS (Safety Data Sheets) applicable to the chemicals along with their DG class, quantities generally stored for each chemical and their location.

It is electronically stored in the HSE folder - *Emergency Preparedness and Response*

The listing of chemicals in the manifest along with all chemicals associated the company's activities are held in the externally managed database *Chemwatch*. This contains SDS (Safety Data Sheets) for all these chemicals.

The company's Emergency Response Service is through IXOM on 1800 033 111.



Picture 2 – DG Manifest locations and emergency assembly points

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10. MAPS

A map of trade waste collection pits and ponds, stormwater discharge points and immediate neighbours which could be impacted is shown in Picture 3.



Picture 3 – Neighbours, tradewaste pits and ponds and stormwater discharge points

11. TRAINING REQUIREMENT

The training level for this SWP is “B”

No	Requirement	Responsibility
1	Work through the procedure with applicable personnel every 2 years	HSE Manager
2	Record training on form “N14.02 – Training Log – Level B”	HSE Manager
3	Store a copy on file and update training matrix	HSE Manager
4	Review procedure every years or as required within this period	HSE Manager

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REVISION HISTORY:

Rev	Revision History
28-Aug-2020	Reviewed as part of PRMP testing – no notifiable changes
16-Apr-2020	Reviewed as part of PRMP testing – no notifiable changes
12-Sep-2019	Review the document and add: <ul style="list-style-type: none"> • Samples are taken for first flush pits during heavy rain events • Monitoring and cleaning of Drum Dryer Plant powder/water scrubber • Increase the minimum number of people on site from 1 to 2
2-Feb-2017	Minor changes - New HSE Coordinator Role established
24-Jun-2016	R3– Procedure Reviewed – no notable changes
2-Jul-2014	Procedure Reviewed – no notable changes
16-Aug-2012	First issue,