



Port Kembla Berth 103 Environmental Responsibilities - Bridging Document

1.0 Introduction

The NSW Environmental Protection Authority (EPA) has produced a document titled *Environmental Guidelines: Preparation of Pollution Incident Response Management Plans*. This guide allows Boskalis Australia to assess its emergency response capability and subsequent obligations within the *Environmental Protection Licence* issued by the EPA for the Port Kembla Berth 103 Stage 2 Extension – Dredging and Spoil Disposal Project.

Section 3 of the guidelines relates to *General Requirements for Preparing Pollution Incident Response Management Plans*. It states in *Section 3.2* 'A licensee who already has a plan or equivalent plan in place is not necessarily required to prepare a new or separate plan under these legislative changes. A plan may form part of another existing emergency or incident management plan as long as the information required to be included in the plan is readily identified in another document as meeting the requirements of *Section 153C* and *Protection Of Environment Operations Act* (POEO) and the *Protection Of Environment Operations (General) Regulations* [POEO(G)].

The guidelines deal with pollution incident response management in two separate phases:

- Pre-emptive planning; and
- Reactive management.

Boskalis Australia Pty Ltd (BKA) has developed a series of documents for project operations. The two most relevant documents are:

- Dredging Environmental Management Plan (DEMP) (036-10211-02-002)
- Emergency Response Plan (ERP) (036-10211-02-004)

Minor reference is made to other documentation for the purpose of general information.

2.0 Document Reference Points

2.1 Section 3.3.1 – Description and likelihood of hazards [clause 98C(1)(a) and (b)]

Response – Environmental hazards and associated mitigation strategies are identified within the DEMP.

Reference points are *Section 8 and 9* of the DEMP.

2.2 Section 3.3.2 – Pre-emptive actions to be taken [clause 98C(1)(c)]

Response – The project Work Method Statement (WMS) identifies the scope of work and methods to be used during marine dredging operations and the DEMP establishes the associated environmental controls and monitoring protocols.

Reference point is *Section 9* of the DEMP.

2.3 Section 3.3.3 – Inventory of Pollutants [clause 98(1)(d) and (e)]

Response – Chemicals used and stored by BKA on the Port Kembla Berth 103 project are principally for the operation and maintenance of dredging equipment. Chemicals are stored in appropriately bunded containment areas, accompanied by in-date Australian MSDS and chemical inventories are maintained at storage locations (including vessels). Only minimum quantities of chemical pollutants will be retained on-site (including oils, grease and lubricants).

The bunkering of vessels will be undertaken in accordance with Port Authority of NSW permit requirements and the BKA Bunkering Fuel Procedure (BKA-205).

Reference points are *Section 9.11 and 9.15* of the DEMP.

2.4 Section 3.3.4 – Safety Equipment [clause 98C(1)(f)]

Response – The project emergency response capability is covered in the BKA Emergency Response Plan (ERP) and addressed in the DEMP. Spill kits commensurate with identified response requirements are available on all vessels and at strategic key-side locations. Site personnel and vessel crews are trained and/or aware of response requirements and associated actions to be taken in the event of a spill.

Reference points are *Sections 9 and 11* of the DEMP and *Section 11* of the ERP.

2.5 Section 3.3.5 – Contact Details [clause 98C(1)(g) and (h)]

Response - Emergency contact details are noted in the *Environmental Incident Flow Chart* within the ERP.

Reference point is *Appendix 1* and *Appendix 2* of the ERP.

2.6 Section 3.3.6 – Communicating with Neighbours and the Local Community [clause 98C(1)(i)]

Response – BKA are operating under the jurisdiction of the Port Authority of NSW and NSW Ports while conducting dredging operations within the confines of the Port Kembla harbour. All external communications relating to the project will be managed by NSW Ports.

BKA is required under EPA licencing arrangements to post summaries of water quality and turbidity monitoring data associated with its dredging activities. These will be made available on the BKA web site <http://australia.boskalis.com/>

Reference point is the project Environmental Protection Licence.

2.7 3.3.7 – Minimising Harm to Persons on the Premises [clause 98C(1)(j)]

Response - All personnel participating on the BKA Port Kembla Berth 103 Stage 2 Extension project are required to complete a site based induction. Within the induction presentation, health, safety and environmental hazards and controls are presented. Project personnel are also required to comply with the BKA Health Safety and Environmental procedures associated with operational work activities.

The main reference points are *Sections 10, 11, 12* and *16* of the Health Safety Environmental Management Plan (HSEMP), *Section 9* of the WMS, *Section 9* of the DEMP and *Section 11* of the ERP.

2.8 3.3.8 – Maps [clause 98C(1)(k)]

Response – A BKA Berth 103 site plan is included in the ERP and identifies the location of chemical storage, the storm water drain and associated discharge point.

Reference point is *Appendix 5* of the ERP.

2.9 3.3.9 – Actions to be Taken During or Immediately After a Pollution Incident [98C(1)(l)]

Response – An environmental incident flow chart has been developed to assist the Boskalis project management team in reporting an environmental incident within the Port Kembla harbour area.

Reference points are *Section 5* and *Appendix 6* of the ERP.

2.10 3.3.10 – Staff Training [98C(1)(m)]

Response - Information relating to Boskalis project personnel emergency response training requirements can be located in the HSEMP and the ERP.

Reference points are *Section 5.5* of the HSEMP and *Sections 5.3* and *11.2.2* of the ERP.