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Steel

Pollution Incident Response Management Plan

Sydney Melt Shop and Rolling Mill

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If you are responding to a pollution incident, critical sections of this Plan include:

- **Section 2.9 (read first) – Actions to be taken during or immediately after a Pollution Incident**
- **Section 2.4 – Safety Equipment**
- **Section 2.6 – Communicating with Neighbours and the Local Community**
- **Section 2.8 - Maps**

Table of Contents

1 Introduction 3

1.1 Background 3

1.2 Objective 3

1.3 Scope 3

1.3.1 Definition of Pollution Incident 3

1.4 Form of Plan 4

2 References 4

3 Pollution Incident Response Management Plan 4

3.1 Description and Likelihood of Hazards 4

3.2 Pre-Emptive Actions 4

3.3 Inventory of Pollutants 5

3.4 Safety Equipment 9

3.5 Contact Details 9

3.6 Communicating with Neighbours and the Local Community 9

3.6.1 Notification of Immediate Neighbours 10

3.6.2 Notification of Community 11

3.7 Minimising Harm to Persons on the Premises 11

3.8 Maps 11

3.9 Actions to be taken during or immediately after a Pollution Incident 12

3.10 Staff Training 12

4 Making Plans Available 12

5 Testing Plans 12

6 Review History 13

7 Annex 1 – Publicly available Information 14

1 Introduction

1.1 Background

The *Protection of the Environment Legislation Amendment Act (2011)* (POELA Act) introduced several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act includes a new requirement to prepare, keep, test and implement a Pollution Incident Response Management Plan.

1.2 Objective

The objectives of the Plan are 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, WorkCover NSW, and Fire and Rescue 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.

1.3 Scope

The Plan inherently has been written to assist with the management of pollution incidents.

Not all environment incidents are classified as pollution incidents. While aspects of the plan may be applicable to all environment incidents, this plan need only be fully applied and implemented to environment incidents that are deemed to be pollution incidents.

The Plan has applicability to both Sydney Melt Shop and Rolling Mill, hereafter referred to as the site.

1.3.1 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, 148 and 151 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.

Material harm pollution incidents involving odour are required to be notified to the EPA in the same manner as other environmental incidents.

The Pollution Incident Notification Flipchart contains further information to assist in the classification of pollution incidents.

1.4 Form of Plan

A copy of this plan must always be available in written form at the site. A written copy of the plan must be made available to an authorised EPA Officer on request or to any other person responsible for implementing the plan.

2 References

Pollution Incident Notification Flipchart (KN-109-1900)

Sydney Steel Mill Emergency Management Plan (PR-107-3587)

Pollution Incident Notification procedure (TL-109-1897)

SSM Spill Response & Management (WI-109-4372)

Site Stormwater Drainage Map (SMM-MD-092357-0001)

3 Pollution Incident Response Management Plan

The following sections address the content required for the Pollution Incident Response Management Plan. The Plan has been prepared using the EPA's Environmental Guidelines for the 'Preparation of Pollution Incident Response Management Plans' published in March 2012.

Accordingly, the Plan has been prepared to comply with Section 153C of the Protection of the Environment Operations Act and the Protection of the Environment Operations (General) Regulation. Any future reviews of this Plan must ensure that the document remains compliant with these or any updated requirements.

3.1 Description and Likelihood of Hazards

The site maintains an Environmental Management System in compliance with the ISO14001 standard. Part of this standard requires that the site document and assess its environmental hazards (called environmental 'aspects' under the standard). It is not intended to reproduce all of the sites environmental hazards in this plan, but rather list the hazards (or types of hazards) which pose a level of threat to the environmental or human health commensurate with the intention of Part 5.7A of the Act.

Table 1 provides an overview of the types of hazards on site, the controls, and the potential route for impacting on the environment or human health. The likelihood has been assessed using the InfraBuild risk ranking tables. Since all site hazards have some form of control mechanism in place, the likelihood assessment has incorporated the effectiveness of those controls.

3.2 Pre-Emptive Actions

A number of standing or pre-emptive actions are employed at the site to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken on site. These actions, which are effectively controls to mitigate risk, have been identified in Table 1.

3.3 Inventory of Pollutants

The majority of potential pollutants at the site are in the form of Dangerous Goods. A separate Dangerous Goods manifest and storage location drawing is maintained by the site and documented in the Emergency Management Plan.

Other potential pollutants and their quantities where relevant at the site are listed in Table 2.

Table 2 – Potential pollutants at the site which are not Dangerous Goods

Potential Pollutant	Quantity	Containment
Scale pits containing process water	>100 kL	Concrete pit
Reheat Furnace operation on Natural Gas	NA	Gas pipeline
Water Treatment Plant containing process water	Variable	Steel and concrete vessels
Transformers containing oil	Approx 1000L each	Metal tank in transformer
Mill Scale	Variable	Hard stand bunker
Electric Arc Furnace and Ladle Furnace Slag	Variable	Hard stand base within slag treatment facility
Baghouse dust (raw or agglomerated)	Variable	Concrete base storage shed
Burnt Dolomite	Variable	Storage silo
Sewer Tanks containing sewerage	Variable	Concrete tank
Hydraulic units containing oil	Variable	Metal tanks

Table 1 – Description and Likelihood of Hazards

Hazard	Potential Impact	Pre-Emptive Controls	Emergency Response Equipment	Circumstances which may increase the potential of environmental or health impact	Likelihood
Use and storage of oils, paints and solvents	A spill or loss to the stormwater system would likely result in a water pollution incident	– Bulk volumes stored in bunded areas – Site incident reporting policy – Spill response kits on site – Labelled stormwater drains	– Spill response kits – Vacuum truck for sucking up pollutants from drains/ground. – Some containment capacity within on-site stormwater network (i.e. outlet number 2- Emergency Shut off Valve)	Rainfall would reduce capability to capture and contain any spill event. Non-production periods where there are limited personnel on site to identify and respond.	Rare
Use, pumping and treatment of process or cooling water (containing metals, oils and treatment chemical)	A spill or loss to the stormwater system would likely result in a water pollution incident	– Scale pit drains situated throughout plant – Bunding and/or flow direction devices in place for containment – Site incident reporting policy – Spill response kits on site – Labelled stormwater drains	– Spill response kits – Vacuum truck for sucking up pollutants from drains/ground. – Some containment capacity within on-site stormwater network (i.e. outlet number 2- Emergency Shut off Valve)	Rainfall would reduce capability to capture and contain any spill event. Non-production periods where there are limited personnel on site to identify and respond.	Possible
Use, transportation and storage of water treatment chemicals	A spill or loss to the stormwater system would likely result in a water pollution incident. A spill or loss to ground would likely result in a soil pollution incident. Corrosive properties and fume generation may pose risk to human health.	– Bulk volumes stored in bunded areas – Most volumes limited to 2400L or less per tank – Stormwater drainage system near water treatment area directs flow to sediment dam for intermediate containment – Site incident reporting policy – Spill response kits on site – Labelled stormwater drains	– Spill response kits – Vacuum truck for sucking up pollutants from drains/ground. – Some containment capacity within on-site stormwater network (i.e. outlet number 2- Emergency Shut off Valve)	Rainfall would reduce capability to capture and contain any spill event. Non-production periods where there are limited personnel on site to identify and respond. Wind may transport fume to neighbouring sites/community though would likely result in dilution of fume concentration and risk.	Unlikely
Use of heavy and light vehicles	Potential for loss of oils and/or diesel to the stormwater system would likely result in a water pollution incident.	– Most volumes are limited to vehicle tank capacity (approx <200L). – Site incident reporting policy – Spill response kits on site – Labelled stormwater drains	– Spill response kits – Vacuum truck for sucking up pollutants from drains/ground. – Some containment capacity within on site stormwater network (i.e. outlet number 2- Emergency Shut off Valve)	Rainfall would reduce capability to capture and contain any spill event. Non-production periods where there are limited personnel on site to identify and respond.	Unlikely
Operation of Natural Gas Reheat Furnace	Potential for air pollution event caused by explosion and/or emissions from incorrect fuel ratios.	– Furnace operated to standard procedure/conditions – Burner Management System in place with key safety interlocks for protection.	– Natural gas isolation	Wind may transport fume to neighbouring sites/community though would likely result in dilution of fume concentration and risk.	Unlikely
Use of equipment which may explode and/or catch fire	Potential for air, water or ground pollution event caused by fire, loss	– Bulk volumes stored in bunded areas. – Site incident reporting policy – Spill response kits on site – Labelled stormwater drains	– Spill response kits – Vacuum truck for sucking up pollutants from drains/ground.	Rainfall would reduce capability to capture and contain any spill event.	Unlikely

Hazard	Potential Impact	Pre-Emptive Controls	Emergency Response Equipment	Circumstances which may increase the potential of environmental or health impact	Likelihood
(motors, electrical transformers, plastic tanks, store items, dangerous goods etc)	of containment/integrity and drainage of fire water	– Separation of susceptible equipment from ignition sources – Most SSM operations occur on sealed ground	– Some containment capacity within on site stormwater network (i.e. outlet number 2- Emergency Shut off Valve) – Fire response equipment – EAF Transformer Deluge System	Non-production periods where there are limited personnel on site to identify and respond. Wind may transport fume to neighbouring sites/community though would likely result in dilution of fume concentration and risk.	
Use of Natural Gas pipe work (large diameter mains supply)	Potential for leak of natural gas to atmosphere causing pollution incident in event of pipe failure or leak.	– Maintenance practices in place	– Natural gas isolation – Fire response equipment	Wind may transport fume to neighbouring sites/community though would likely result in dilution of fume concentration and risk. Ignition sources may result in fire.	Unlikely
Use of water treatment chemical dosing equipment	Potential for air pollution event caused by failure of dosing process resulting in release of chemical fume or gas (such as chlorine dioxide)	– Submerged dosing points – Safe fail mode on dosing equipment	– Power isolation for dosing equipment	Wind may transport fume to neighbouring sites/community though would likely result in dilution of fume concentration and risk.	Rare
Use of process water scale pits at Rolling Mill/Caster	Potential for water pollution incident arising from overflow of scale pits due to rainfall	– Local stormwater diversions away from scale pit where possible – Some intermediate containment available through sediment dam and reed bed	– Vacuum truck for sucking up pollutants from drains/ground. – Some containment capacity within on site stormwater network (i.e. outlet number 2- Emergency Shut off Valve)	Rainfall would reduce capability to capture and contain any spill event. Non-production periods where there are limited personnel on site to identify and respond.	Unlikely
Use of site sewer tank(s)	Potential for water pollution incident arising from overflow of sewer tank(s) due to pump/alarm failure	– Regular pump out arrangements in place – Site incident reporting policy – Spill response kits on site – Labelled stormwater drains	– Spill response kits – Vacuum truck for sucking up pollutants from drains/ground. – Some containment capacity within on site stormwater network (i.e. outlet number 2- Emergency Shut off Valve)	Rainfall would reduce capability to capture and contain any spill event. Non-production periods where there are limited personnel on site to identify and respond.	Unlikely
Generation of EAF baghouse dust	Escape of fugitive dust from dust handling operations or incidents	– Baghouse area enclosed (as practicable) – Awareness of dust containment requirements amongst personnel – Regular housekeeping and street sweeping regime in place – Minimal requirement to handle 'free dust' – Agglomeration process to bind dust particles	– Vacuum truck or equivalent for sucking up dust from ground. – Targeted sweeping/clean-up effort	Wind may transport dust to neighbouring sites/community though would likely result in dilution of dust concentration and risk. Non-production periods where there are limited personnel on site to identify and respond.	Unlikely

Hazard	Potential Impact	Pre-Emptive Controls	Emergency Response Equipment	Circumstances which may increase the potential of environmental or health impact	Likelihood
Stack emission from EAF Baghouse stack	Air pollution event caused by significant visible emission stream for prolonged period	– Baghouse maintenance activities including bag cleaning and changes – Real time opacity monitoring – Licence conditions drive compliance	– Controlled shut down of process in significant circumstances	Wind may transport dust to neighbouring sites/community though would likely result in dilution of dust concentration and risk.	Unlikely
Use of Sediment Dam	Overflow of sediment dam may result in water pollution event	– Real time level monitoring in place with high level alarm generation – Weather forecast monitoring – Use of water in quenching operations – Improved sweeping practices to reduce sediment on internal roads	– Limited opportunity for emergency response.	Non-production periods where there is limited need for water consumption in quenching activities. Overflow would occur during rainfall period meaning catchment is charged and dilution effect maximised.	Possible
Bulk storage of gases including oxygen and argon	Air pollution event on tank failure/leak	– Contracted maintenance of bulk gas vessels – Bollards and separation arrangement in place to protect from impact and non-compatible substances – Dangerous Goods compliance auditing	– Limited opportunity for emergency response. – Isolation valves	Wind may transport gas to neighbouring sites/community though would likely result in dilution of gas concentration and risk. Non-production periods where there are limited personnel on site to identify and respond.	Unlikely
Use of Scrap in Electric Arc Furnace	Explosion in EAF caused by explosive/dangerous materials contained in the scrap charge	– Inspection of scrap deliveries from the weighbridge platform and post-tipping – Rejection of scrap loads containing sealed containers – Radioactive contamination checks for each scrap load	– Limited opportunity for emergency response	Wind may transport gas/fume to neighbouring sites/community though would likely result in dilution of gas concentration and risk	Unlikely
Trade Waste Discharge Stream	Water pollution event caused by leak from trade waste treatment process (neutralisation tank)	– Bunding arrangement with high level cut-off and alarm in place – Periodic maintenance and inspections on equipment	– Spill response kits – Vacuum truck for sucking up pollutants from drains/ground. – Process isolation	Rainfall would reduce capability to capture and contain any spill event. Non-production periods where there are limited personnel on site to identify and respond.	Unlikely
Operation of site	Various operations on site generate odour which may be offensive to community members	– Awareness and monitoring on site	– Limited opportunity for emergency response. – Preheating zone isolation –ensuring doors are shut at all times during preheat of newly relined ladles	Winds from easterly direction would blow any odour source towards residential area.	Possible

3.4 Safety Equipment

The site contains numerous stores or locations of safety equipment which may be used to assist in the response to a pollution incident.

Items of safety equipment at the site include:

- Spill kits located throughout the site.
- Spill response booms and absorbent in bulk supply at the Store.
- Site Security vehicle is equipped with spill kit contents for rapid deployment to any area on site.
- Personal Protective Equipment to assist in spill response located within spill kits, or otherwise at the Store.
- Gas monitoring meters located in the electrical workshop.
- A fire hydrant and hose reel network located throughout the site.

Safety Data Sheets for substances used on site are located in hard copy format in dedicated folders located at the site Security gatehouse. Electronic versions are available via the intranet on site computers.

3.5 Contact Details

The Emergency Management Plan provides a list of contact positions and associated contact numbers for personnel who are responsible for the implementation of this plan and management of any emergency response.

A Pollution Incident Notification procedure has been developed for use in situations where a pollution incident has been deemed to occur and requires notification to authorities. A key component of the procedure is the Flip Chart which has been located in visible areas of the site, such as Information Centres. The Flip Chart is designed to assist with the determination of the need to notify of a pollution incident and details the subsequent process and contact numbers for doing so.

The site does not formally assign responsibilities to any particular person or persons associated with the response to a pollution incident. The response to such an incident would be based on the available personnel at the time which would be drawn from the contact list shown in the Emergency Management Plan.

3.6 Communicating with Neighbours and the Local Community

The occurrence of a pollution incident does not automatically trigger the need for neighbour or community notification. An assessment of the need to undertake notification must be made based upon the specific circumstances of the pollution incident having considered the pollutant type, prevailing winds, height and magnitude of any emission, direction of stormwater/tidal flow, predicted fall-out locations, and possible impacts to potential receptors.

Likely, or foreseeable types of pollution incidents which may trigger a requirement for notification of neighbours and the community have been documented in Table 1. Table 1 also documents circumstances which may increase the potential for environment or human health impact in the event that one of the listed scenarios arises. Whilst every effort has been made to populate Table 1 with foreseeable incident types and conditions, the list provided should not be considered exhaustive.

The following sections describe the site's approach to neighbour and community notification and must be implemented in the event that an assessment of the pollution incident deems that neighbour or community notification is warranted.

3.6.2 Notification of Community

Implement this section where a need to notify has been determined and:

- *potential effects of the pollution incident are considered to be widespread and applicable to the general community.*

InfraBuild has determined that the method to be deployed for the notification of the local community where required is the Emergency Response & Alert system described in the 'City of Blacktown Disaster Plan (Displan) (March 2008)'. Operation of the Emergency Response Alert system is managed by the local combat agency controller. Other methods of community notification may also be employed based upon an assessment of the circumstances by the combat agency controller.

InfraBuild has an obligation to identify relevant pollution incidents to the combat agency controller where those incidents pose, or may pose, an environment impact to the local community.

3.7 Minimising Harm to Persons on the Premises

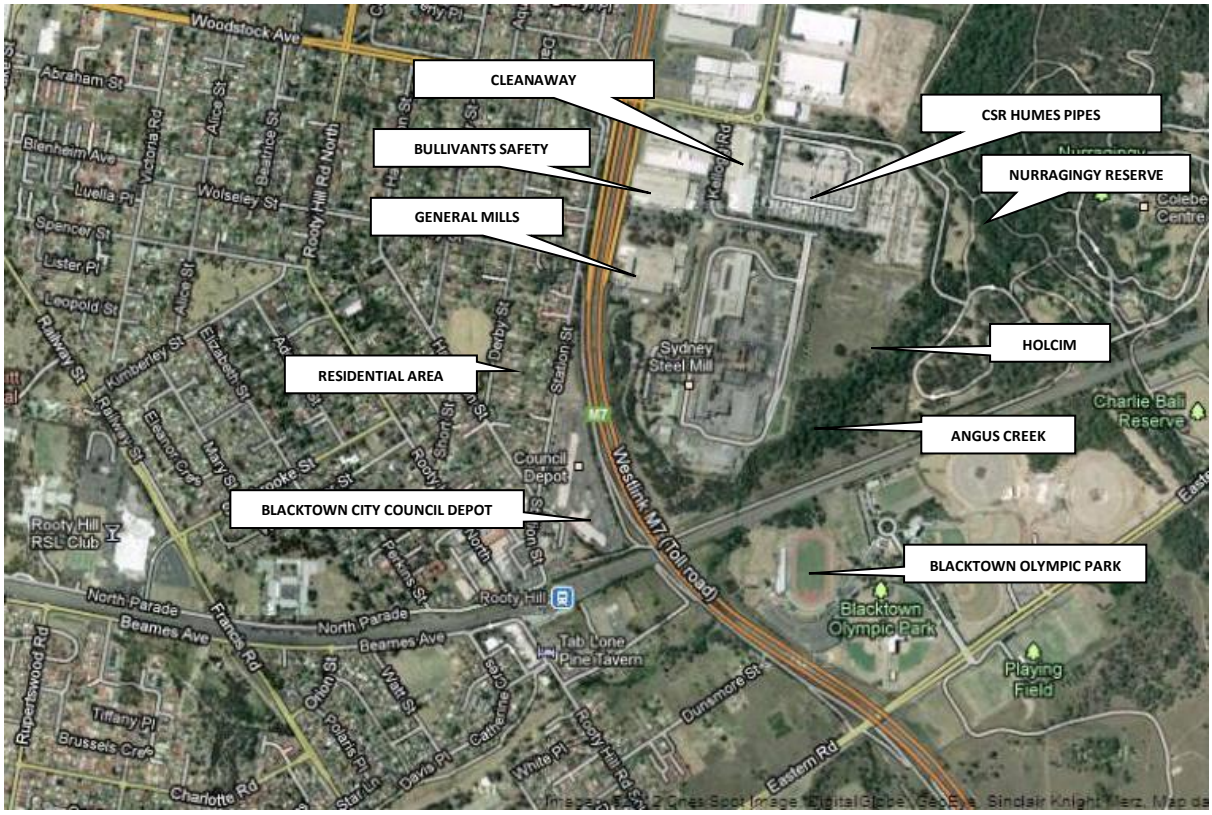
The Emergency Management Plan specifies a process for the prevention of harm to people on site by implementing an emergency evacuation procedure where required.

Awareness of emergency evacuation requirements is communicated through site induction training, sign posted muster points and display of evacuation routes.

3.8 Maps

The location of the site is detailed in the Emergency Management Plan. Figure 1 depicts an aerial image of the site showing the local setting. Areas that may be affected by a pollution incident near the site are primarily limited to the surrounding ambient air environment and adjacent Angus Creek water system.

Figure 1 – Aerial image of site and locality setting.



3.9 Actions to be taken during or immediately after a Pollution Incident

Immediately after a pollution incident has taken place, the following actions will be implemented:

- Ensure immediate notification to authorities has taken place and the associated notification protocol (or flipchart).
- Implement Pollution Incident Response Management Plan, inclusive of consideration of the need and frequency with which to notify neighbours and community.
- Where possible and safe to do so, isolate the equipment or process causing the pollution incident and make area safe.
- Deploy spill containment equipment where possible. Containment equipment may include, though is not limited to:
    - Departmental spill kits
    - Store spill response equipment
    - Emergency isolation points for natural gas, town water, fire water and oxygen
    - Site Security vehicle spill response equipment
- If required, arrange for an industrial services contractor to attend site with a vacuum tanker or other required containment equipment.
- Arrange for disposal of recovered pollutants. This may necessitate temporary storage on site in tanks, containers or pits.

3.10 Staff Training

Communication and training in awareness of this Pollution Incident Response Management Plan will be undertaken following release of the Plan. The scope of the training would extend to:

- An initial toolbox briefing and sign-off process for managers and front line leaders
- Integration into the site environment awareness training package
- Integration into the site induction and new-starter process
- Periodic reminders of the plans existence and purpose through site meetings and positive environment challenges in Information Centres.

Records of formal training processes requiring sign-off will be recorded on the site Training Record System.
Review of training needs and requirements may be undertaken in future reviews of this document.

4 Making Plans Available

Some sections of this Plan must be made publicly available within 14 days after they have been prepared by placing them in a prominent position on the InfraBuild website.
The information to be made available to the public:

- Must include the procedures for contacting the relevant authorities including the EPA, local council, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW.
- Must include the procedures for communicating with the community.

Annex 1 of this Plan contains information to be made available to the public.

5 Testing Plans

Testing of this Plan must occur at least once every 12 months. The testing should seek to ensure that the information included in the plan is accurate and up to date, and the Plan is capable of being implemented in a workable and effective manner. Testing may be undertaken by either desktop simulation or practical exercises and drills and should seek to cover all components of the Plan, including effectiveness of training.

This Plan must also be tested or reviewed within one month of any pollution incident occurring to determine whether the information in the Plan is current and capable of being implemented in a workable and effective manner.

Prompts for testing of the Plan are documented and published in the compliance matrix of the Monthly Environment Report.

For any test completed on this Plan, a Cority entry must be created to capture the manner in which it was tested and the name of the persons involved with the test. Any subsequent changes made to the Plan must be managed and documented in a formal manner through the controlled document system.

6 Review History

Version No.	Date	Amendments
8	26/07/2019	Removal of OneSteel and replace with InfraBuild
9	10/04/2021	Reviewed performed after dam overflow incident (20/03/21). Included improved sweeping practices as a pre-emptive control and replaced reference to IRMS by Cority.
10	01/July/2021	Updated Table 1 to include transportation of water treatment chemicals as a hazard and to include soil pollution incident as a potential impact.
11	2/09/2022	Updated relevant authorities
12	26/08/2024	Updated immediate neighbours list and reference list

*** Note: Succeeding version history are noted in Nexus*

7 Annex 1 – Publicly available Information

This Annex has been prepared for the purposes of online publication of requirements relating to the site Pollution Incident Response Management Plan.

It contains a direct reproduction of content drawn from the Pollution Incident Response Management Plan though has been modified to exclude personal information within the meaning of the *Privacy and Personal Information Act 1998.*

Contacting Relevant Authorities to Notify a Pollution Incident

Only complete Step 1 followed by Step 2 if there is an immediate threat to human health or property. If not, complete Step 2 only.

Step 1

External Body	Phone Contact Details	Notification Record		
		TIME / DATE of notification	NAME of Person Notified	Initial Advice / Comment
1. Emergency Services (Fire and Rescue, Police, Ambulance Services)	**000** *Only call first if there is an immediate threat to human health or property.*			

Step 2 - Proceed with the following notifications **in the order provided.**

2.EPA	**131 555** *For SMS/SRM quote Licence 6125*			
3. The Ministry of Health (via the Parramatta public health unit)	**(02) 9840 3603** **After hours: (02) 8890 5555**			
4. SafeWork NSW	**Emergency: 13 10 50**			
5. The Local Authority (Blacktown City Council)				
6. Fire and Rescue NSW				
7. Sydney Water				
8. InfraBuild Site Security	**(02) 9675 9950**			
9. Mill Manager (ensure manager is notified)				
10. Department of Planning				

2.6.1 Notification of Immediate Neighbours

Implement this section where a need to notify has been determined and:

- potential effects of the pollution incident are considered to be localised to immediate site neighbours; or
- potential effects of the pollution incident are considered to be widespread and applicable to the general community.

The site is located on Kellogg Road, Rooty Hill.

Table 3 lists nearby land uses which lie within immediate proximity of the site operating facilities. In the event of a pollution incident occurring, consideration needs to be given to notifying the premises occupiers where it is deemed that the pollution incident may put those premises or the occupiers at risk. Any notification made should seek to provide where possible detail regarding any possible controls that may assist such as closing windows and doors.

Table 3 – Land uses within close proximity to Sydney Steel Mill Rooty Hill operations

Direction	Owner/Occupier	Description of land user	Contact Details
North	**Cleanaway**	Waste management facility	
Northeast	**CSR Humes Pipes Ltd**	Concrete pipe manufacturing facility	
East	**Holcim RDC**	Holcim concrete aggregate processing and Regional Distribution Centre	
	Nurragingy Reserve	Blacktown City Council Regional Parkland and Event Centre. The Angus Creek water system flows from Nurragingy Reserve along the southeast boundary of the SSM site	
Southeast	**NSW Transport (CityRail)**	Western Rail Line (Sydney to Penrith)	
South	**Blacktown Olympic Park**	Indoor and outdoor sporting facilities	
Southwest	**Blacktown City Council**	Rooty Hill Council depot in Station St houses equipment for the use of Blacktown City Council in maintaining its services to the residents of the council area	
West	**Motorway**	Westlink M7 Motorway	
Northwest	**General Mills (Aust) Pty Ltd**	Food manufacture & packaging	
	Bullivants Safety	Storage of safety and inspection equipment	

2.6.2 Notification of Community

Implement this section where a need to notify has been determined and:

- potential effects of the pollution incident are considered to be widespread and applicable to the general community.

InfraBuild has determined that the method to be deployed for the notification of the local community where required is the Emergency Response & Alert system described in the 'City of Blacktown Disaster Plan (Displan) (March 2008)'. Operation of the Emergency Response Alert system is managed by the local combat agency controller. Other methods of community notification may also be employed based upon an assessment of the circumstances by the combat agency controller. InfraBuild has an obligation to identify relevant pollution incidents to the combat agency controller where those incidents pose, or may pose, an environment impact to the local community.

InfraBuild

Building futures through sustainable steel

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