



## EMS Operational Procedure

### POLLUTION INCIDENT COMMUNICATION MECHANISM

Issued by: Environment & OHS

**Revision Date:**  
08/03/2013

**Origin Date:**  
25/10/2012

Rev.: 1

#### REVISION HISTORY

Rev	Affected Page	Change Descriptions
0	All	Initial Release
1	All	Change to reflect EPA NSW requirements Document format and layout

**Prepared by/date:** Sharad Gupta 08/03/2013


**Reviewed by/date:** Bob Gray 11/03/2013

**Approved by/date:** Les Fried - Managing Director 12/03/2013

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## 1.0 PURPOSE

This procedure defines the process for:

- Internal environmental communication/awareness within the organisation.
- External environmental communication between the organisation and external interested parties, such as regulatory authorities and the public/local community groups.

## 2.0 SCOPE

The following describes the procedure for all communications both internal and external dealing with Environmental, Safety and Health issues. Issues that may be communicated are: audit finding, spills and pollution, waste generation, accident information, risk assessment, control information, etc

## 3.0 DEFINITIONS AND ACRONYMS

External Communications: written or electronic correspondence, telephone conversations and oral discussions or meetings with anyone external to the company.

## 4.0 PROCEDURES

### 4.1 Internal communication/awareness


4.1.1 Internal environmental communications shall be implemented to ensure those personnel at each relevant level and function is aware of the following

- the environmental management system;
- the importance of conformance with the environmental policy, procedures and system;
- the potential consequences of system non-conformances;
- individual roles and responsibilities in achieving conformance with procedures, including emergency preparedness and response; and
- the significant environmental aspects associated with work activities and the environmental benefits of improved personal performance.

4.1.2 Internal environmental communications may be accomplished by the use of:

- Notice boards
- Awareness training of facility personnel, as appropriate in line with job function
- Environmental training of relevant job functions, as appropriate (see Environmental Training procedure)
- Newsletters
- Electronic notes

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- Team meetings and meeting minutes
- Management reviews and meeting minutes
- Corrective Action Requests

- 4.1.3 Communication of environmental issues from employees to the Management Team shall be handled by a representative from the affected area, in coordination with the Environmental Management Representative. In most instances, the representative will be the site Production Manager. These communications shall be documented.
- 4.1.4 Communication of changes to legal & other requirements shall be handled by the Environment Management Representative (EMR). These communications shall be documented.
- 4.1.5 The Plant Manager shall send an Environmental Report to the Environmental Manager each month.
- 4.1.6 In the event of an environmental incident or emergency (i.e. tank leak or spill), the Plant Manager shall notify the Environmental & OHS Manager immediately. When the situation has been contained, the Plant Manager shall complete the Environment Complaint/Nonconformance Report form and forward a copy to the Environmental & OHS Manager.
- 4.1.7 The Plant Manager shall send any other environment report as requested from time to time by the Environmental & OHS Manager. All reports sent by the Plant Manager shall be duly signed and dated.
- 4.1.8 All external monitoring reports such as stack emission reports or ultrasonic wall thickness test reports of acid tanks shall be forwarded by the consultants to the Environmental & OHS Manager.

## 4.2 External communication

- 4.2.1 External communications concerning the environmental aspects of the facility should be directed to the General Manager, Human Resources Manager or the Environmental & OHS Manager.
- 4.2.2 The Environmental & OHS Manager in consultation with the General Manager is responsible for responding to inquiries from interested parties and regulatory agencies.
- 4.2.3 The Human Resources Manager or designee is responsible for sending current copies of the environmental policy to interested parties. These requests will be documented on the External Communications Log.
- 4.2.4 The General Manager in consultation with the Environmental & OHS Manager is responsible for responding to media communications.

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4.2.5 Where community concerns relate to an environmental emergency or nonconformity, the Corrective and Preventive Action Procedure shall be implemented..

4.2.6 The Environmental & OHS Manager or designee is responsible for determining the need for and preparation of any notification to regulatory agencies on an as needed basis.

In response to any incident, Environmental & OHS Manager is responsible to notify the following external authorities and neighbours. The plant manager must notify immediately to the Environmental Manager about any incident. The Plant Manager will also inform the community, provided they are likely to be affected, about the incident and potential health risk. Omega will seek help from Port Stephens Council in such a matter.

#### List of External authorities

A. EPA (NSW)	13 15 55
B. WorkCover	02 9370 5000
C. Port Stephens Council	02 4980 0255
D. Ministry of Health NSW	02 9424 5918

#### List of Neighbours

A. Western Boundary- Thomas Coffey	02 4964 8747
B. Southern Boundary - Glade Manufacturing	02 4964 8077
C. Eastern Boundary – JAC Pump Services P/L	0408 492 424
D. Southern Boundary – Abengoa-Cambell	0499 993 440

Note : The facility is located in the industrial/semi-rural area and there is no population in the immediate vicinity. Hence probability of impacting human health is extremely low, however, community will be notified via telephone

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