

Dangerous Goods and Hazardous Materials Sub Plan

Camden Gas Project
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1. Introduction

An Environmental Management Plan (**EMP**) has been prepared for the AGL Upstream Investments Pty Ltd (**AGL**) Camden Gas Project ('the project' or '**CGP**'). This Dangerous Goods and Hazardous Materials Sub Plan (**DGHMSP**) has been prepared to supplement the EMP.

The EMP includes a description of the CGP and the overall environmental management framework for the CGP. The DGHMSP has been developed to specifically address and manage Dangerous Goods and Hazardous Materials and the current AGL Energy Health, Safety and Environment Management System (**HSEMS**).

The construction and operations phases for all current development consents have now been completed. The CGP has now ceased gas production and is being decommissioned. This Sub Plan addresses day-to-day decommissioning and rehabilitation activities associated with the CGP.

Note: All historical references to construction and operations activities have been retained in this plan for completeness and to document compliance with Licence and Development Consent requirements.

1.1 Objective

The objective of this DGHMSP is to manage the purchasing, storage, transport, handling and disposal of Dangerous Goods and Hazardous Materials (including waste Dangerous Goods and Hazardous Materials) during operation, maintenance and rehabilitation activities so as to minimise the risk of impact to the environment (soil, surface water, groundwater, atmosphere).

1.2 Target

- Zero non-conformances with statutory dangerous goods and hazardous materials conditions.
- Zero incidents or complaints received concerning dangerous goods and hazardous materials.

1.3 Responsibilities

The roles and responsibilities for implementing this DGHMSP are summarised in **Table 1.1**. Further responsibilities are assigned in **Section 5.1** and **Section 5.2**.

Table 1.1: Roles and responsibilities

Role	Responsibility
Lead – Environment Programs and Projects	<p>Review and update the DGHMSP following modifications to Project Development Approvals or new Development Approvals.</p> <p>Notifying the EPA and other parties as required by the AGL Camden Gas Project Pollution Incident Response Management Plan (PIRMP) in the event of a pollution event or land contamination.</p> <p>Induct field personnel in the DGHMSP.</p>



Role	Responsibility
Asset Manager	<p>Ensure a system of inspections of Dangerous Goods and Hazardous Material storage areas are in place to demonstrate management in accordance with the DGHMSP.</p> <p>In the absence of the Lead – Environment Programs and Projects, responsible for notifying the EPA and other parties as required by the AGL Camden Gas Project PIRMP in the event of a pollution event or land contamination.</p>
Health and Safety Business Partner	<p>Notifying SafeWork NSW when Dangerous Goods are stored above 'Manifest' quantities. (Note – The CGP does not currently store Dangerous Goods above Manifest levels and is therefore not currently required to notify SafeWork.)</p> <p>Responsible for coordinating a Hazard Audit every three years or as determined by the Director-General.</p>
All leaders	<p>Responsible for ensuring that all works under their control are undertaken in accordance with the DGHMSP. Responsible for ensuring that all employees and contractors under their control are familiar with and adhere to the requirements of the DGHMSP.</p>
All employees/contractors	<p>Following the Dangerous Goods and Hazardous Materials management requirements identified in induction and this DGHMSP, including but not limited to Section 4 of this DGHMSP.</p>



2. Requirements

2.1 Key licence/development consent requirements

The key licence and development consent requirements relating to Dangerous Goods and Hazardous Materials are included in **Table 2.1**:

Table 2.1: Key licence and development consent

Reference	Requirement	Section of this Management Plan
Environment Protection Licence No. 12003	Requirement to undertake licensed activities in a competent manner, including handling, movement and storage of materials and substances.	Section 2.1.1 Item 1 in Table 4.1 (Section 4)
DA 282-6-2003i: 97 (Sch 4)	Requirement to store, handle and transport DGs in accordance with Australian Standards and the Dangerous Goods Code; and Explosives in accordance with the requirements of the DRE.	Section 2.1.1 Item 3 in Table 4.1 (Section 4)
DA 183-8-2004 MOD (MP25): SoC 4	The Proponent shall construct and operate MP25 in accordance with the Camden Gas Project Environmental Management Plan (AGL Gas Production Camden 2008, or its latest version). This plan includes sub plans dealing with noise, flora and fauna, soil and water, Aboriginal cultural heritage, landscape and rehabilitation, air quality, waste, traffic, dangerous goods and hazardous materials storage, and emergency response.	General Item 1 in Table 4.1 (Section 4)
DA 183-8-2004 MOD (MP25): SoC 9	The Proponent shall ensure on-site storage of fuel, lubricants and any chemicals used in relation to MP25 will be kept to a minimum and these items will be stored in bunded containment areas.	Item 3 in Table 4.1 (Section 4) Environmental Management Sub Plan Compliance Checklist



2.1.1 Key regulatory requirements

The key regulatory requirements relating to Dangerous Goods and Hazardous Materials include those listed in **Table 2.2**:

Table 2.2: Key regulatory requirements

Legislation/ Policy	Relevance
Protection of the Environment Operations Act 1997	<ul style="list-style-type: none"> It is an offence wilfully or negligently to cause any substance to leak, spill or otherwise escape (whether from a container) in a manner that harms or is likely to harm the environment (Part 5.2, Clause 116, 1(a) and (b)). It is an offence to pollute waters (Section 120). Pollution incidents causing or threatening material harm to be notified to the EPA (Part 5.7, Clauses 147 to 153). It is an offence to cause or permit the emission of any offensive odour from a premises (Part 5.4, Clause 129). Waste must be stored in an environmentally safe manner (Section 143).
Contaminated Land Management Act 1997	Clause 60 Duty to Report Contamination - A person who becomes aware that the person's activities in, on or under land have contaminated the land in such a way as to present a significant risk of harm must, as soon as practicable after becoming so aware, notify the EPA in writing that the land has been so contaminated.
Key Australian Standards / Codes	<p>The Australian Dangerous Goods Code.</p> <p>AS1216: Class Labels for Dangerous Goods.</p> <p>AS1940: The Storage and Handling of Flammable and Combustible Liquids.</p> <p>AS2507: The Storage and Handling of Pesticides.</p> <p>AS3780: The Storage and Handling of Corrosives.</p> <p>AS3833: The Storage and Handling of mixed classes of Dangerous Goods in packages and Intermediate Bulk Containers.</p> <p>AS4326: The Storage and Handling of Oxidizing Agents.</p>
Work, Health and Safety Regulation 2017 (WHS Reg)	<p>The Work Health and Safety Regulation 2017 (WHS Regulation) provides for notification of dangerous goods through requiring notification of Schedule 11 hazardous chemicals (Clause 347 and 348).</p> <p>Containers for hazardous chemicals and dangerous goods are required to be used, handled, and stored in accordance with this regulation (Clause 364).</p> <p>If volumes of hazardous chemicals and dangerous goods increase an assessment should be undertaken to confirm whether a Dangerous Goods Notification would be required (Clause 347 and 348).</p>



2.1.2 Reporting requirements of Dangerous Goods and Hazardous Chemicals

The WHS Regulation commenced for most workplace activities on 1 January 2012. A transition period of five years was established to allow for a smooth transition to the new classification (Globally Harmonised System of Classification and Labelling of Chemicals (GHS)), Safety Data Sheets (SDS) and labelling requirements. The GHS is mandatory for manufacturers or importers from 1 January 2017.

Requirement to submit Dangerous Goods Notification

From 01 January 2015 AGL is required under the WHS Regulation to notify SafeWork NSW of dangerous goods requiring notification of Schedule 11 hazardous chemicals which exceed the manifest quantities, identified in **Table 2.3**.

It should be noted however that AGL must continue to comply with the ADG Code and relevant state and territory transport of dangerous goods by road and rail. When in the workplace however, dangerous goods must meet the labelling requirements prescribed under the WHS Regulations.

Table 2.3 identifies the hazardous chemicals placard and manifest quantities based on the WHS Regulation 2017.

Table 2.3: Schedule 11 Placard and Manifest Quantities WHS Regulation 2017

Item	Description of Hazardous Chemical	Placard Quantity	Manifest Quantity	
1	Flammable gases	Category 1	200 L	5,000 L
2	Gases under pressure	With acute toxicity, categories 1, 2, 3 or 4	50 L	500 L
3		With skin corrosion categories 1A, 1B or 1C	50 L	500 L
4		Aerosols	5,000 L	10,000 L
5		Not specified elsewhere in this Table	1,000 L	10,000 L
6		Flammable liquids	Category 1	50 L
7	Category 2		250 L	2,500 L
8	Category 3		1,000 L	10,000 L
9	Any combination of chemicals from Items 6 to 8 where none of the items exceeds the quantities in columns 4 or 5 on their own		1,000 L	10,000 L
10	Category 4		10,000 L	100,000 L
11	Self-reactive substances	Type A	5 kg or 5 L	50 kg or 50 L
12		Type B	50 kg or 50 L	500 kg or 500 L
13		Type C to F	250 kg or 250 L	2,500 kg or 2,500 L
14	Flammable solids	Category 1	250 kg	2,500 kg
15		Category 2	1,000 kg	10,000 kg



Item	Description of Hazardous Chemical		Placard Quantity	Manifest Quantity
16	Flammable solids	Any combination of chemicals from Items 12 to 15 where none of the items exceeds the quantities in columns 4 or 5 on their own	1,000 kg or 1,000 L	10,000 kg or 10,000 L
17	Pyrophoric liquids and pyrophoric solids	Category 1	50 kg or 50 L	500 kg or 500 L
18	Self-heating substances and mixtures	Category 1	250 kg or 250 L	2,500 kg or 2,500 L
19		Category 2	1,000 kg or 1,000 L	10,000 kg or 10,000 L
20		Any combination of chemicals from Items 17 to 19 where none of the items exceeds the quantities in columns 4 or 5 on their own	1,000 kg or 1,000 L	10,000 kg or 10,000 L
21	Substances which in contact with water emit flammable gas	Category 1	50 kg or 50 L	500 kg or 500 L
22		Category 2	250 kg or 250 L	2,500 kg or 2,500 L
23		Category 3	1,000 kg or 1,000 L	10,000 kg or 10,000 L
24		Any combination of chemicals from Items 21 to 23 where none of the items exceeds the quantities in columns 4 or 5 on their own	1,000 kg or 1,000 L	10,000 kg or 10,000 L
25	Oxidising liquids and oxidising solids	Category 1	50 kg or 50 L	500 kg or 500 L
26		Category 2	250 kg or 250 L	2,500 kg or 2,500 L
27		Category 3	1,000 kg or 1,000 L	10,000 kg or 10,000 L
28		Any combination of chemicals from Items 25 to 27 where none of the items exceeds the quantities in columns 4 or 5 on their own	1,000 kg or 1,000 L	10,000 kg or 10,000 L
29	Organic peroxides	Type A	5 kg or 5 L	50 kg or 50 L
30		Type B	50 kg or 50 L	500 kg or 500 L
31		Type C to F	250 kg or 250 L	2,500 kg or 2,500 L



Item	Description of Hazardous Chemical	Placard Quantity	Manifest Quantity	
32		Any combination of chemicals from Items 30 and 31 where none of the items exceeds the quantities in columns 4 or 5 on their own	250 kg or 250 L	2,500 kg or 2,500 L
33	Acute toxicity	Category 1	50 kg or 50 L	500 kg or 500 L
34		Category 2	250 kg or 250 L	2,500 kg or 2,500 L
35		Category 3	1,000 kg or 1,000 L	10,000 kg or 10,000 L
36		Any combination of chemicals from Items 33 to 35 where none of the items exceeds the quantities in columns 4 or 5 on their own	1,000 kg or 1,000 L	10,000 kg or 10,000 L
37	Skin corrosion	Category 1A	50 kg or 50 L	500 kg or 500 L
38		Category 1B	250 kg or 250 L	2,500 kg or 2,500 L
39		Category 1C	1,000 kg or 1,000 L	10,000 kg or 10,000 L
40	Corrosive to metals	Category 1	1,000 kg or 1,000 L	10,000 kg or 10,000 L
41		Any combination of chemicals from Items 37 to 40 where none of the items exceeds the quantities in columns 4 or 5 on their own	1,000 kg or 1,000 L	10,000 kg or 10,000 L
42	Unstable explosives		5 kg or 5 L	50 kg or 50 L
43	Unstable chemicals	Any combination of chemicals from items 11, 29 and 42 where none of the items exceeds the quantities in columns 4 or 5 on their own	5 kg or 5 L	50 kg or 50 L

Notes.

- 1 In item 2, Gases under pressure with acute toxicity, category 4 only applies up to a LC50 of 5000 ppmV. This is equivalent to dangerous goods of Division 2.3.
- 2 Item 4 includes flammable aerosols.
- 3 Determination of classification of flammable liquids



For the purposes of this table, if a flammable liquid category 4 is used, handled or stored in the same spill compound as one or more flammable liquids of categories 1, 2 or 3, the total quantity of flammable liquids categories 1, 2 or 3 must be determined as if the flammable liquid category 4 had the same classification as the flammable liquid in the spill compound with the lowest flash point.

Example. For placarding and manifest purposes, a spill compound containing 1000 L of flammable liquid category 1 and 1000 L of flammable liquid category 4 is considered to contain 2000 L of flammable liquid category 1.



3. Areas of Dangerous Goods and Hazardous Material storage

Dangerous Goods and Hazardous Materials are stored and handled at the workover rig. The ChemAlert system was introduced in 2019 to maintain an up to date register on the Dangerous Goods and Hazardous Materials at each of these locations.

A list of Dangerous Goods and Hazardous Materials stored and handled is provided in **Section 4.4.7** of the PIRMP.



4. Control measures – Dangerous Goods and Hazardous Materials

All employees and contractors must follow the actions for each activity as described in **Table 4.1**.

Table 4.1: Dangerous Goods and Hazardous Materials management controls

Activity	Action	Responsibility
1 General	a) All activities under the existing EPL licence shall be undertaken in a competent manner, including handling, movement and storage of materials and substances.	Lead – Environment Programs and Projects, Asset Manager
	b) A Hazard Audit shall be undertaken in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines" (by a suitably qualified independent person) 12 months after the commencement of operations of the proposed development and every 3 years thereafter. Within one month of the audit being undertaken, a report shall be submitted to the Director-General.	Health & Safety Business Partner
	c) All required plans/studies/systems shall be undertaken or prepared to the relevant Hazardous Industry Planning Advisory Panel.	Health & Safety Business Partner
	d) Construction, operation, maintenance and rehabilitation of MP25 shall be undertaken in accordance with the Camden Gas Project Environmental Management Plan.	Lead – Environment Programs and Projects, Asset Manager



Activity	Action	Responsibility
2 Purchasing	a) All Dangerous Goods and Hazardous Materials stored in the on-site chemical storage shed shall be entered on the CGP Chemical Manifest (including a register, risk assessments and safety data sheets - SDS).	Health & Safety Business Partner
	b) New Dangerous Goods and Hazardous Materials shall be purchased in accordance with the AGL Purchasing Procedure, risk assessment undertaken and SDS obtained.	All employees
3 Storage, use and transport	a) All Dangerous Goods and Hazardous Materials shall be stored and where practicable handled within containment facilities (for example, bunded areas, leak proof trays) designed to prevent the release of spilt substances to the environment.	All employees
	b) On-site storage of fuel, lubricants and any chemicals used will be kept to a minimum and these items will be stored in bunded containment areas.	All employees
	c) The storage, handling and transport of Dangerous Goods and Hazardous Materials shall comply with legislation and Australian standards (and the Dangerous Goods Code; and Explosives in accordance with the requirements of the DMR (now DTIRIS: DRE)), including but not limited to containment, placarding and segregation from incompatible materials.	Asset Manager
	d) All vehicles and equipment shall be adequately maintained so as to minimise drips/ leaks of Dangerous Goods and Hazardous Materials.	All employees
	e) All storage and handling equipment (including transfer hoses) shall be kept in a well maintained condition.	All employees
	f) Transport of Dangerous Goods to be undertaken under appropriate licence.	Asset Manager



Activity	Action	Responsibility
4 Risk Assessment	a) Job Safety and Environment Analysis (JSEAs) shall incorporate storage and handling of Dangerous Goods and Hazardous Materials and reference the relevant Safety Data Sheets (SDS).	All employees
	b) Prior to commencing construction, operations, maintenance or rehabilitation, the planned arrangement of all Dangerous Goods and Hazardous Materials storage areas should be reviewed to eliminate potentially hazardous conditions.	All employees
5 Labelling	a) All Dangerous Goods and Hazardous Materials should be stored in approved containers and properly labelled in accordance with the GHS guidelines.	All employees
	b) All packaged dangerous goods must be labelled in accordance with the Australian Dangerous Goods code.	All employees
	c) If unmarked drums arrive on location or if in doubt as to the constituents of a chemical substance, treat as a hazardous, toxic substance until found otherwise.	All employees
6 Training	a) The workforce induction program shall inform site personnel of the required chemical storage and handling procedures and the required spill prevention and response procedures.	Lead – Environment Programs and Projects
	b) The SDS must be read prior to using any substance and available during storage and use of Dangerous Goods and Hazardous Materials.	All employees
	c) Training records are to be maintained by AGL.	Health & Safety Business Partner
7 Decanting	Any Dangerous Goods and Hazardous Materials decanted into a second container must be clearly labelled in accordance with the GHS guidelines.	All employees



Activity	Action	Responsibility
8 Disposal	a) Waste Dangerous Goods and Hazardous Materials, including empty drums and containers, must be stored in assigned storage areas until they are disposed of in accordance with the SDS.	All employees
	b) Waste Dangerous Goods and Hazardous Materials shall be managed and disposed in accordance with the requirements of relevant legislation and industry standards.	Lead – Environment Programs and Projects
9 Spill Response	a) In the event of a spill or leak of Dangerous Goods and Hazardous Materials the safety of personnel and third parties shall be protected as the first priority.	All employees
	b) All spills of Dangerous Goods and Hazardous Materials shall be addressed promptly and stopped at source as soon as practicable and contained to the smallest possible area.	All employees
	c) Appropriate strategies and equipment shall be in place to deal with a spill of all types and volumes of Dangerous Goods and Hazardous Materials to be used on-site.	Health & Safety Business Partner, Lead – Environment Programs and Projects
	d) Containment and recovery equipment shall include, but not be limited to absorbent materials (for example, pads and straw bales), shovels and sand bag sacks and protective clothing (for example, gloves, overalls, and boots).	Lead – Environment Programs and Projects



Activity	Action	Responsibility
	e) In the event of a pollution incident the Person-In-Charge will immediately contact the Camden Lead – Environment Programs and Projects . If the Lead – Environment Programs and Projects cannot be reached the Person-In-Charge will contact the Camden Asset Manager . The Lead – Environment Programs and Projects and/or Camden Asset Manager will determine based on the information provided if the incident is has or is likely to result in material harm. Section 5 of the PIRMP is to be followed to determine if there has been material harm, and the necessary notification protocol to be followed.	Lead – Environment Programs and Projects, Asset Manager
	f) Spilt material shall be recovered as soon as possible, using appropriate equipment.	All employees
	g) Contaminated soil, or spill recovery materials (such as sawdust and absorbent pads) shall be disposed of at appropriately licensed facilities.	Lead – Environment Programs and Projects
	h) Spill response equipment shall be maintained onsite and replaced as required.	All employees
	i) All spillages involving Dangerous Goods and Hazardous Materials from any part of the CGP are to be treated as toxic substances.	All employees
	j) All spills shall be reported and investigated in MyHSE.	All employees



5. Monitoring and reporting

5.1 Monitoring requirements

- The **Lead – Environment Programs and Projects** is responsible for:
 - Assessing the implementation of this Sub Plan and performance of management controls, through completing the *Environmental Management Sub Plan Compliance Audit – Dangerous Goods and Hazardous Materials (AEL 8610868)*.
- The **Asset Manager** is responsible for:
 - Inspections of Dangerous Goods and Hazardous Material storage areas to ensure management in accordance with the DGHMSP.

5.2 Reporting requirements

Dangerous Goods and Hazardous Materials Reporting requirements include:

- **SafeWork NSW Notification:** The **Health and Safety Business Partner** is responsible for:
 - notifying SafeWork NSW when Dangerous Goods are stored above 'Manifest' quantities (refer to Table 2-3). The CGP does not currently store Dangerous Goods above Manifest levels and is therefore not currently required to notify SafeWork NSW.
- **Pollution Incidents:** Pollution incidents causing or threatening material harm to be immediately notified by the **Lead – Environment Programs and Projects** and/or the **Asset Manager** to the EPA as well as relevant stakeholders in accordance with Section 5.3 and Appendix D of the PIRMP. The relevant stakeholders include fire brigade (in the event of fire), DPPI, Resources Regulator, EPA, NSW Ministry of Health, Camden Council, Campbelltown City Council, Wollondilly Shire Council and SafeWork NSW.
- **Contaminated Land:** In the event that a person becomes aware that the person's activities in, on or under land have contaminated the land must, as soon as practicable after becoming so aware, they must notify the **Lead – Environment Programs and Projects** and/or the **Asset Manager**, who in turn will notify the EPA in writing that the land has been so contaminated. Such a person is required to notify the EPA of contamination in any of the following circumstances:
 - the level of the contaminant in, or on, soil exceeds a level of contamination set out in NSW Department of Environment and Climate Change (now EPA) *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997* with respect to a current or approved use of the land, and people have been, or foreseeably will be, exposed to the contaminant, OR
 - the contamination meets a criterion prescribed by the regulations, OR
 - the contaminant has entered, or will foreseeably enter, neighbouring land, the atmosphere, groundwater or surface water, and the contamination exceeds, or will foreseeably exceed, a level of contamination set out in these guidelines and will foreseeably continue to remain above that level.
- **Hazard Audit:** It is a requirement to undertake a Hazard Audit every three years or as determined by the Director-General. The **Health and Safety Business Partner** is responsible for coordinating this audit. Hazard audits shall be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, "Hazard Audit Guidelines". Dangerous Goods and Hazardous Materials to be included in the Hazard Audit. The Hazard Audit report shall be provided within one month of an audit, and be submitted to the Director-General.



5.3 Records

Records related to this DGHMSP may include:

- SafeWork NSW Notification
- Environmental incidents (including pollution incident reports).
- Contaminated Land Reports
- 3 yearly Hazard Audits
- Environmental Management Sub Plan Compliance Audit – Dangerous Goods and Hazardous Materials (AEL 8610868).
- Complaints concerning Dangerous Goods and Hazardous Materials.
- Independent environmental compliance audits



6. Administrative

6.1 Site specific plans

- AGL Camden Gas Project Emergency Response Plan (AEL 8610896)
- AGL Camden Gas Project Pollution Incident Response Management Plan (PIRMP) (AEL 8617007)

6.2 Definitions

- **Dangerous Goods** - “are substances or articles that present an immediate hazard to people, property or the environment. They include explosives; gases; flammable liquids; solids with a flammability hazard; oxidising substances; toxics; radioactive substances; corrosives and miscellaneous dangerous goods such as dry ice, molten bitumen and environmentally hazardous substances.” (SafeWork NSW)
- **Hazardous Materials** - are defined as a substance that has the potential to harm the health of persons. It can be a single chemical entity, or a mixture. Substances are either listed in the National Occupational Health and Safety Commission's “List of Designated Hazardous Substances” or fit the criteria for a hazardous substance as per the National Occupational Health and Safety Commission's Approved Criteria for Classifying Hazardous Substances [NOHSC:1008(2004)] published by Worksafe Australia.
- **Hazardous Chemical** - a substance, mixture or article that satisfies the criteria for a hazard class in the Globally Harmonised System of Classification and Labelling of Chemicals, excluding substances where the criteria is based solely for specific hazards classes (WHS Regulation, 2017).

6.3 References

- AGL Health, Safety and Environment Policy
- Gas Operations Hazardous Chemicals Standard (AEL 8611538)
- AGL-HSE-STD-007.9.1 Hazardous Chemicals and Substances Standard
- AGL-HSE-SDM-007.9.1 Hazardous Chemicals and Substances Standard Methodology