Global Resource Recovery
Darwin LWTP

EMERGENCY RESPONSE PLAN

800 Berrimah Rd, East Arm, Darwin

Revision H

Date Reviewed: 16/03/2022

Rev	Changes	Authorisation	Date
A	New	James Macdonald	10/8/17
B	Updated smoking restrictions - banning smoking on all areas of the site Added reference to building design standards & NT conditions Added detail regarding ensuring that stormwater valves are closed to spill related procedures Added reference to environmental concerns and spill containment to spill related procedures Added Bushfire response procedure Added major rainfall event procedure Added cyclone response procedure	James Macdonald	20/3/18
C	Added Revision Status Table Updated Emergency protocol to include use of two-way radio in Vopak control room and use of Emergency Channel	James Macdonald	16/7/18
D	Added office & site evacuation maps Updated Contact details Appendices added	Jessica Perry	11/10/18
E	Updated Contact Details Updated Maps/Appendices Removed Intertek	Bevan Wall	11/06/19
F	Improved Environmental Incident Response Actions	Todd Sinclair	29/12/19
G	Changes to plan based on EPA feedback in license application	Todd Sinclair	26/02/20
H	Reviewed plan and updated site contact details	James Macdonald	16/03/22

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1. SITE AND HAZARD DETAIL

This section provides a brief overview of the site, focusing on the company processes and site hazards with the objective of controlling or minimizing the effects that an emergency may have on-site, on neighbouring properties and on the surrounding environment.

1.1. Name, Address and Nature of Operations

LOCATION / ADDRESS: 800 Berrimah Rd, East Arm, NT 0822

800 Berrimah Rd is a waste treatment and resource recovery facility operated by Global Resource Recovery (GRR). The site is operational 12 hours a day, 5 days a week. During glycol recycling runs this increases to 24 hours 5 days a week.

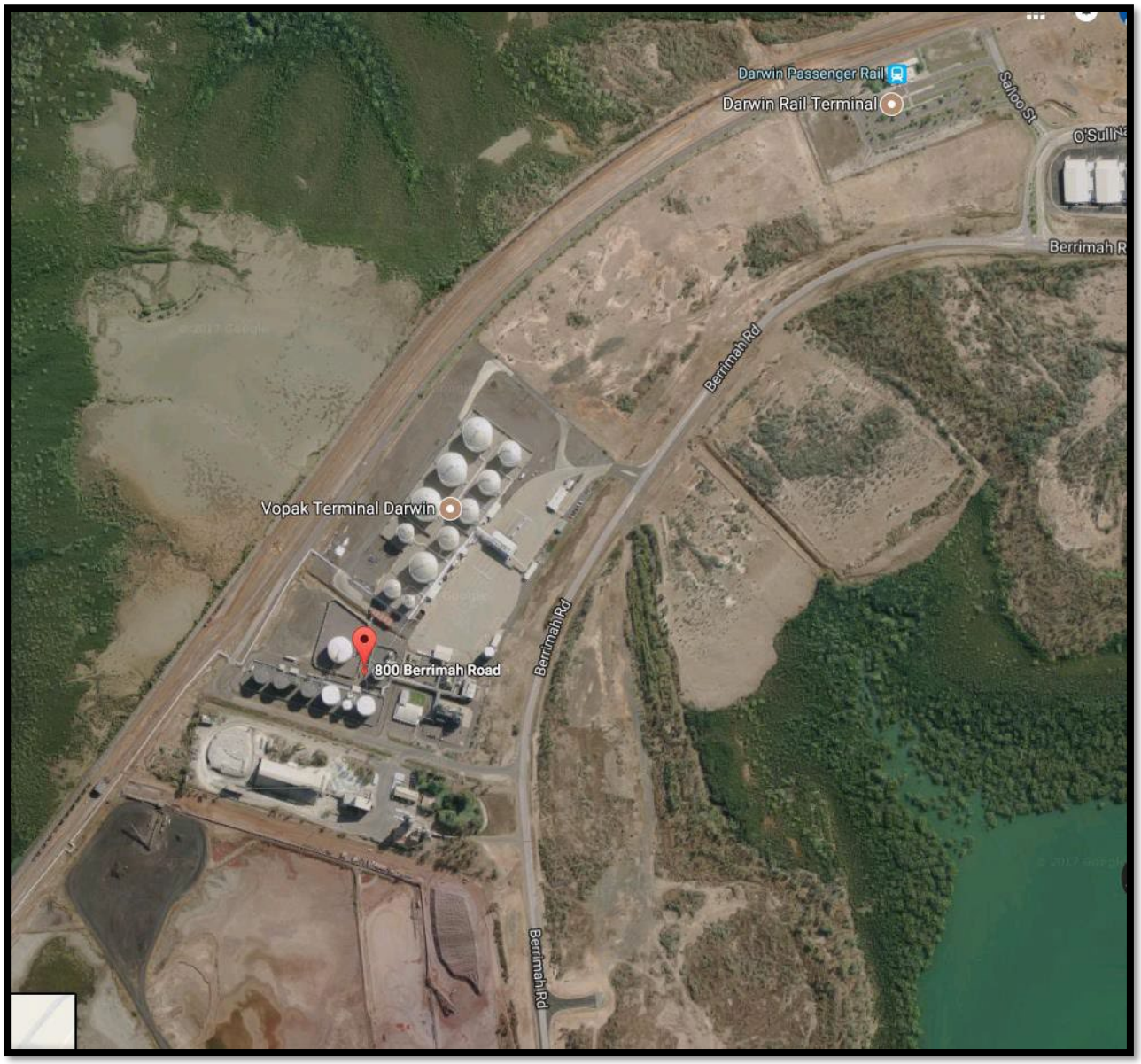
GRR operate 3 main treatment processes:

- Bulk liquid waste treatment – Chemical treatment of industrial wash waters, process waters and other non-Dangerous Goods aqueous waste which is subsequently discharged to sewer or disposed to landfill. This is conducted in the Waste Water Treatment Plant (WWTP).
- Oil recycling – thermal and physical separation of oily water / watery oil mixtures to create saleable fuel oil. This is conducted in the Oil Recycling Plant.
- Glycol Recycling – Thermal separation of glycol wastes generated by the transport and oil & gas industries to recover glycols suitable for reuse. This is completed in the Glycol Plant.

The site enforces the use of Personal Protective Equipment Clothing at all times on site except in the administration office.

1.2. Detailed Map of the Facility and Surrounding Area

An aerial photo of the site and surrounding area is attached below.
Attachment 1 contains a detailed site plan showing production and storage areas. These will be referred to in this plan.



1.3. Inventory of Schedule 2 materials

The site is an NT WorkSafe approved dangerous goods site.

BULK STORAGE

Material	Class	Sub-risk	UN #	PG	Tank Capacity
Waste Oil	C1 Combustible Liquid	n/a	n/a	n/a	100,000L
Recycled Oil	C1 Combustible Liquid	n/a	n/a	n/a	50,000L
Waste Acid	8	n/a	3264	III	60,000L
Waste Alkali	8	n/a	3266	III	20,000L
Waste Glycol	Not Dangerous	n/a	n/a	n/a	350,000L
Recycled Glycol	Not Dangerous	n/a	n/a	n/a	100,000L
Waste Water	Not Dangerous	n/a	n/a	n/a	500,000L

MANUFACTURING AREAS

Area	Materials	Class	Sub-risk	PG	Maximum quantity
Main WWTP	Hydrochloric Acid	8		II	2,000 Litres
	Ferric Chloride	8		II	2,000 Litres
	Phosphoric Acid	8		II	2,000 Litres
	Sodium Hydroxide	8		II	2,000 Litres
	Magnesium Hydroxide	8		II	2,000 Litres
Compressor Room	Compressed Air				400 Litres
	Compressed Nitrogen				200 Litres

PACKAGED STORAGE (IBC)

Area	Material	Class	Sub-risk	PG	Maximum quantity
Packaged Waste Store	Waste metal compounds	6.1		III	25 tonnes
Packaged Waste Store	Waste Acids	8		II & III	50 tonnes
Packaged Waste Store	Waste Alkalis	8		II & III	50 tonnes
Packaged Waste Store	Waste Oils & Hydrocarbons	3		II & III	50 tonnes
Packaged Waste Store	Waste Solvents	3 / 6.1		II & III	50 tonnes
Oxidiser Container	Waste Oxidisers	5.1		II & III	20 tonnes
Packaged Waste Store	Other waste types				50 tonnes

1.4. Maximum – Minimum Number of People Expected on Site

Area	Minimum	Maximum
Front Office	1	7
Control room	1	5
Waste Water Treatment Plant	1	3
Glycol/Oil Plant	1	3
Filterpress Area	1	2
Loading Bays & external areas	1	5

This table accounts for permanent workers and head office staff who are likely to be on site on a regular basis. Additional maintenance contractors often work on site during the day.Visitors on site are recorded in the visitor book at reception.

1.5. Infrastructure likely to be affected by an incident

All buildings, storage tanks, and facilities are at risk of being affected by an incident. The Vopak terminal handles bulk volumes of hazardous substances. Due to the immediate proximity of the site to Vopak and some shared services such as fire water systems, Vopak emergencies will almost certainly impact on the GRR site.

1.6. Emergency Planning Assumptions

The basic assumptions are made:

- All involved people act responsibly to minimise danger.
- Personnel follow rules –i.e. wear personal protective equipment when required and don't smoke on site etc.
- All systems are updated and in working order.
- Emergency Services shall be notified within 2 minutes after the first on site acknowledgement of a major incident during day-light hours.
- The arrival of Emergency Services will take approximately 20 minutes to arrive on site during the day; and up to 35 minutes during the night after initial notification of an incident and.
- During an emergency, workers intervene to their level of training, be it first aid or use of local fire equipment, keeping in mind at all times that life and self-preservation comes first.

1.7. Control Measures

All site production systems have been designed to "fail safe", i.e. valves fail closed, pumps fail off etc.

The site has been designed and built to NT building standards with all structures engineered to withstand cyclonic winds and drainage has been engineered for tropical rain events.

The site has been equipped with fire extinguishers and fire hydrants to meet the requirements of all relevant Regulations and Standards (see attachment 1)

Staff are equipped with PPE and equipment, such as spill kits, to minimise their risk of exposure during normal operations and in the event of minor incidents.

The site has been designed and built to maximise the capture of any spill on site and to reduce the risk that any waste or fire water will be discharged to environment.

Please see HAZOP notes for more detailed explanation of all control measures.

2. COMMAND STRUCTURE AND PERSONNEL

2.1. Emergency Control Team Contacts

Internal Emergency Contacts

Emergency Role	Person	Position	Phone
Emergency Coordinator (Orange Helmet)	Mick Rogers	Site Manager	0474 258 378
Deputy Emergency Coordinator and Primary 1st Aid (Orange Helmet)	Brett Williams	Shift Leader	0450 437 866
Production Area Warden (Red Helmet)	Joel Zanich	Operations	0447 958 391
Office Area Warden (Red Helmet)	Jessica Perry	Office Admin	0423 422 339

2.2. Roles and Responsibilities for Implementing the Plan

In the event of an incident:

- The Emergency Controller is responsible for coordinating the site response and for providing technical advice on the best way to respond.
- In the absence of the Primary Emergency Coordinator, the Deputy will assume the position of Primary, and can assign a temporary Deputy if it is deemed required.
- The Production Area Warden is responsible for shutting down all process equipment and for assisting any contractors on site to evacuate and/or respond appropriately to the incident.
- The Office Area Warden is responsible for evacuating all staff and visitors from the Admin building and bringing the visitor book and staff board to the appropriate evacuation point.

3. EMERGENCY PROCEDURES

3.1. Raising the Alarm

In the event of any incident the first method of communication with the Emergency Control Team is via Channel 4 on UHF radio or via mobile phone. As all GRR radio's are set to channel 3, manual tuning to channel 4 required.

3.2. Vopak Interaction

The adjacent Vopak site is a Major Hazard Facility. It is imperative to inform them of all emergencies on the GRR site. This is the case even if GRR do not think that it will impact on Vopak.

In the case of emergency. **Vopak have a radio tuned to the GRR Emergency Channel on the two-way radio system in their control room. This channel should be used to inform Vopak of any emergency situation and to provide frequent updates to the Vopak Control Room.**

3.3. Evacuation procedure and accounting for personnel

Upon the alarm being raised all personnel should:

- Shutdown the process they are working on.
- Turn off and make safe any equipment that is in use.
- Proceed to the assembly point.
- Ensure any visitors / contractors in the area evacuate with staff to the assembly point.
- Office Warden to collect staff board and visitor book to enable roll call.
- Report to the Emergency Coordinator for the roll call.
- Do not attempt to re-enter the site for any reason.
- Follow instructions given by the Emergency Coordinator.
- Do not leave the assembly point until the Emergency Coordinator gives the all clear.

3.4. Isolation points for Essential Services

Mains Water and Natural Gas Isolation points are located at the Berrimah Rd boundary of the site, adjacent to the filter press area.

Storm Water Isolation points are located within each bund and at the final discharge point. All isolation points are kept closed unless actively discharging. The Site Plan shows the network of these drains.

Electricity isolation breakers are located in the main switch room.

Steam and compressed air isolation valves are located outside the boiler room.

3.5. Incident Procedures

Incidents Involving Potential for Environmental Harm

The Darwin GRR site stores and handles a variety of chemicals, hydrocarbons and waste substances which may cause environmental harm if a loss of containment occurs. The GRR Darwin Emergency Response Procedure has identified the following events as potential emergency situations.

1. Minor Spills of substances or products during process operations (less than 200 litres outside of a containment area)
2. Major Spills of substances or products during process operations (more than 200 litres outside a containment area)
3. Any spills of flammable, toxic or corrosive substances or products during process operations
4. Failure of bund and containment valves
5. Fires or explosion resulting in airborne emissions or pollution
6. Major or minor emergency events occurring in neighbouring properties (Vopak or Northern Cement)

Methodology

The risk of events which may cause harm to the environment is mitigated via a combination of controls. The objective of these controls is primarily preventative, aimed to reducethe risk and an event occurring but includes reactive controls which will be implemented to reducethe severity and impact of any event which may cause environmental harm or pollution from occurring. Preventative and reactive controls include:

- Plant and equipment design which is suited to safe waste handling and management,
- Maintaining containment bunds in a sealed (closed) state at all times
- Asset integrity programs including preventative maintenance of equipment,
- Training and Procedures in safe site and task based operations
- Response specific equipment including spill kits, pumps, hoses and storage vessels.

GRR places emphasis on ensuring that preventative controls are constructed, implemented and maintained ahead of any reactive control options in all cases.

Minor Spill / Leak (<200 litres) Procedure

Almost all operational activities where there is a risk of a spill will occur within a bunded area or on a sealed surface such as concrete. This reduces the risk of any spill reaching a soil or other environmentally sensitive location.

In the event of a minor spill which is not within a contained area such as a bund, the following procedure is to be implemented.

- Do not immediately approach site of spill
- Cease any nearby works and remove potential ignition sources
- Make area safe by evacuation persons from the immediate area
- Perform an immediate “Take Five” risk assessment to identify priority Health Safety and Environmental Risks
- Consult the SDS (in control room) for the recommended product spill response process
- If substance is hazardous, flammable or corrosive - consider evacuation of area of site
- Isolate source of spill by closing valves if possible
- Obtain any PPE, if required, to protect you from the chemical (rubber boots, breathing protection etc)
- Contain the spill using appropriate spill response equipment to prevent entry to drains, leaving the site or unsealed soil areas
- After safe containment has been achieved – collect and recover any spilled substances using either dry or wet clean-up methods depending on the material and SDS guidance
- Notify NT WorkSafe and the NT EPA as required based on nature of product, WHS outcomes, impact on environment and cause of spill.

Major Spill (>200 litres) Procedure

- Do not immediately approach site of spill
- Cease any nearby works and remove potential ignition sources
- Make area safe by evacuation persons from the immediate area
- Close site to access and vehicle traffic until spill is under control
- Perform an immediate “Take Five” risk assessment to identify priority Health Safety and

Environmental Risks

- Isolate source of spill by closing valves if possible
- Consult the SDS (in control room) for the recommended product spill response process
- Isolate source of spill by closing valves if possible
- If substance is hazardous, flammable or corrosive - consider evacuation of area of site
- Engage external support if spill containment or recovery exceeds on-site capability (vacuum truck supplier or emergency services etc)
- Advise site neighbours if impact to site operations is likely.
- Obtain any PPE, if required, to protect you from the chemical (rubber boots, breathing protection etc)
- Contain the spill using appropriate spill response equipment to prevent entry to drains, leaving the site or unsealed soil areas
- After safe containment has been achieved – collect and recover any spilled substances using either dry or wet clean-up methods depending on the material and SDS guidance
- Notify NT WorkSafe and the NT EPA as required based on nature of product, WHS outcomes, impact on environment and cause of spill.

Product or Substance Spill from process failure (within Bunded area)

- Identify the location of the failure and substance type
- Immediately stop any pumps associated with the process failure
- Close all valves up and down stream of the failed process equipment
- Ensure that bund and stormwater isolation valves downstream of spill location are closed
- Cease any nearby works and remove all potential ignition sources
- Make area safe by evacuation persons from the immediate area
- Close site to access and vehicle traffic until spill is fully controlled and contained
- Perform an immediate “Take Five” risk assessment to identify priority Health Safety and Environmental Risks
- Avoid exposure via breathing in any mist or vapour
- Obtain any PPE, if required, to protect you from the chemical (rubber boots, breathing protection etc)
- Shut all remaining valves (as required within process circuit)
- Transfer spill to
- Clean up the spill using either dry or wet clean-up methods depending on the material
- Notify regulators as required

Failure of Stormwater Release Valve

The final stage stormwater valve is the final control point between the GRR stormwater pit and the mangrove wetlands located to the West edge of the GRR site.

Failure of the final stormwater release valve may result in one of two outcomes.

1. Inability to perform a controlled release of water resulting in an possible overflow event of water.
2. Inability to stop the release of water from site

Overflow is highly unlikely (other than within an extreme and prolonged rainfall event) as the pit is capable of holding far more water than is anticipated in normal process operations and is maintained at a low level throughout day to day operations.

Stuck Closed Valve
A stuck (closed) valve will not result in an immediate emergency event as no harmful water release to environment can occur. It is important that valve repairs are undertaken to allow the controlled release of water when required.

The required actions are:

- Retain stormwater within the final stage pit.
- Isolate final pit from upstream water supply
- Repair release valve.
- Chemist to test final stormwater water conditions and parameters
- Release water in accordance with normal release protocols

Stuck Open Valve
A stuck open or blocked valve will not result in an immediate emergency event as any planned water release will have been tested and approved in accordance with water quality testing process.

It is important to ensure that valve repairs are undertaken to allow the retention and control of future stormwater as required.

The required actions are:

- Complete the planned release of water
- Isolate the final stormwater pit section via use of valves
- Unblock or repair final stage valve as soon as practicable to ensure that water can be retained and released in accordance with water quality testing process.

Fires and Explosion on GRR site - Procedure

A fire and / or explosion is serious safety event and may result in the prolonged release of smoke, heat and toxic vapour within the GRR site as well as beyond the site boundary causing.

- Where you are trained to do so, and it is safe to do so; attempt to extinguish the fire by:
    - Shutting off any fuel source
    - Utilising the appropriate fire-fighting equipment

- If not possible to extinguish the fire, call 000 for the fire brigade and initiate site shutdown using ESD devices and initiate site evacuation

Where the fire requires external support from emergency services, GRR will contact the neighbouring sites (Vopak and Northern Cement) and advise them of the fire and planned response.

Bushfire response procedure

- Monitor progress of bushfire to determine response required

- Where bushfire could potentially impact GRR site, commence site shutdown and evacuation procedure

Major rainfall event procedure

The primary risk of an extreme and prolonged rainfall event is the potential to overflow containment bunds, blind sumps and interceptor pits across the site. This overflow may result in uncontrolled spillage of some water across the site boundaries onto adjacent sites and potentially into the natural environment. This outcome may not be eliminated in all cases and is mitigated through the following

preventative controls:

- Ensure all tank, other storage and production bunds are kept as clean as possible and are empty at all times.

- When significant rainfall is predicted:
    - Check all bunds, assess any contents and empty contents to the appropriate storage/ treatment/ disposal location.
    - Ensure that all isolation valves are closed

- During / Following rainfall:
    - Assess water quality in all bunds and empty contents to the appropriate storage/ treatment / disposal location as required.

If contamination is suspected within a bund area and there is a risk of overflow:

- Consider transfer of that water to a suitable collection tank, alterative bund or temporary storage vessel.

Where a rain event has caused a loss of containment of a bund or stormwater services, the EPA shall be notified.

Cyclone response procedure

- Pre-season cyclone preparation actions (prior to 1 November):
    - Minimise volumes of packaged waste stored on site
    - Minimise number of empty containers on site
    - Clean up any loose materials and equipment around the site
    - Check fastenings of all tanks and storage containers; tighten, repair or replace if required
    - Check packaged waste tie-down points and straps for damage, replace if required
    - Review Cyclone Response Procedure
    - Ensure all staff have been trained in Cyclone Response Procedure

- Stage 1 – Cyclone Watch actions (>24hr <48hr)
    - Remove all possible packaged waste from site – prioritise transport and treatment of packaged waste
    - Contact customers / suppliers to delay deliveries of packaged materials
    - Remove and/or relocate all empty containers to ensure none are in outside storage areas
    - Sample Trade Waste batch tanks with a view to begin discharge prior to issue of 12hr warning
    - Staff to ensure that all loose equipment, materials and debris that could become airborne has been removed/secured.
    - Check all production and storage bunds and empty if required
    - Check Stormwater pit and empty if required
    - Site Manager to monitor cyclone progress and respond accordingly

- Stage 2 – Cyclone Warning (24hr)
    - Advise all staff and contractors that a Cyclone Warning has been issued
    - Contact customers to delay all possible waste deliveries
    - Tie down all packaged materials remaining in outside storage areas
    - Site Manager to check that all loose equipment, materials and debris have been removed / adequately secured

  - Re-check all production and storage bunds and empty if required
  - Re-check Stormwater pit and empty if required
  - Provide situation update to Vopak Control Room

- Stage 3 – Cyclone Warning (12hr)
  - Cycle down production with a view to closing site as soon as possible following issue of the 12-hour warning
  - Send home non-essential staff and contractors
  - Contact all customers and suppliers to notify them that the site is not accepting any further deliveries until the cyclone has passed
  - Begin discharge of trade waste batch tank/s
  - Site Manger to check that all packaged materials remaining in outside storage areas have been adequately secured
  - Site Manager to re-check that all loose equipment, materials and debris have been removed / adequately secured
  - Re-check all production and storage bunds and empty if required
  - Re-check Stormwater pit and empty if required
  - Provide situation update to Vopak Control Room
  - Send home all remaining staff as tasks are complete

- Stage 4 – Safety Management and Lockdown issued by NTES
  - Complete shutdown and securing of site
  - Re-check all production and storage bunds and empty if required
  - Re-check Stormwater pit and empty if required
  - Provide situation update to Vopak Control Room
  - All Staff and contractors to seek suitable shelter

- Stage 5 – Destructive Winds Impact Greater Darwin
  - All staff and contractors to remain in a place of safety until the All Clear is given
- All Clear
  - The Site Manager and Lead Operations Manager shall inspect the site as soon as practicable to assessing site damage and to coordinate any clean-up and recommencement of operations
  - All serious site damage shall be reported to GRR National Management for insurance and business continuity planning
  - The site Manager shall schedule recommencement of operations and notify all staff and contractors of timeframe
  - Check all production and storage bunds and empty
  - Check Stormwater pit and empty
  - Complete site clean-up and recommencement of operations as per Site Manager's schedule

Confined Space Rescue

All work in confined spaces is systematically controlled by a prior risk assessment and is coordinated using a permit to work system. Each permit for confined space work will have a specific Rescue Plan outlined within the permit and communicated to the work party involved.

In the event of an incident, the stand-by person is to notify the Rescue Team and put the specific plan into place.

Vehicle Accident

The primary objective of responding to a vehicle related incident is the safety of injured persons.

Where a vehicle incident or traffic collision has resulted in injured persons:

- Make the site as safe as practicable
- Provide initial first aid to the level of your capability
- Call 000 for an ambulance if required
- Turn off any vehicles
- Isolate any spills from the vehicle or damaged equipment

Workplace Health or illness Event

A workplace health event may involve a wide-ranging acute illness or infection impacting the majority of GRR employees on the site and risking business capability. This event may be caused by occupational or non-occupational factors such as a gastro, pathological or other acute disease.

- Except when there is risk of further harm, DO NOT attempt to move any casualty
- Immediately contact the Primary First Aider via UHF or mobile phone for advice, and if you are first aid trained, commence first aid
- Call 000 for an ambulance if required

Bomb Threat Procedure

Persons may be motivated for various reasons to cause business disruption or actual damage to a workplace via the use of threats or actual use of improvised devices which may explode, release smoke of gases or cause fire within the site.

In the event of a credible threat to the GRR site or to GRR operations via telephone, the following actions shall be adopted.

- Remain calm and listen carefully to the nature of the threat
- Concentrate on the caller's voice (do you recognise the voice) and mood and try to assess any background noises
- Take notes about what you can hear and what is said.
- Do not hang up even when the call is completed.
- Notify the Site Manager about the call as soon as possible.
- The Site Manager will notify the police of the threat and decide if the evacuation procedure is required.
- Complete a Bomb Threat report as soon as possible after the call, using the checklists.
- Follow the Site Managers instructions.
- The Site Manager will organize a search in coordination with advice from the police.

3.6. Procedure for Decontamination following an Incident

If you suspect that your clothing or skin has been exposed a chemical or if you suffer a reaction to chemicals during works.

1. Alert a co-worker and request First Aid to your location
2. Immediately go to the nearest safety shower, activate it, remove any clothing that was exposed and stand under the water for at least 20 minutes.
3. If the chemical is in the eye, then use the eye wash for at least 20 minutes to ensure that all remains of the chemicals is washed away.

4. Contact an ambulance if chemical impacts continue or persist.
5. If a chemical is ingested, check the MSDS for response procedure and notify your supervisor immediately.

Decontamination of the site and surrounding environment will be conducted as part of the spill clean-up procedure and will involve either wet or dry clean-up depending on the material involved.

4. NOTIFICATIONS AND REPORTING

4.1. On-site Communication Systems

The primary method of communication of site is to use site based UHF radios, landline office phones and mobile phones as appropriate.

4.2. Reporting Triggers to Emergency Services

The following are reportable incidents which must be reported to the Emergency Services:

- Any serious injury to a person requiring external medical support
- Any NT WorkSafe "notifiable incident"
- Any structural fire, hazardous and non-contained spill or gas mains leak
- Any credible Bomb Threat in person or via telephone
- Presence of an armed intruder or violent trespasser on site or in area
- Any environmental spill, pollution event or other environmental harm event

4.3. Contact details for Emergency Services and other Authorities

Service	Company	Phone
Fire	NT Fire and Rescue	**000 (Emergency)** 89 99 3473 (Other)
Ambulance	St John Ambulance	**000 (Emergency)** 89 226200 (Other)
Police	NT Police	**000 (Emergency)** 131444 (Other)
Electricity and Water (Faults)	Power and Water	1800 245 090
Gas Mains Supply	APA Gas	1800 069 113
Immediate Neighbour	Vopak Control Room	08 8999 9100
Neighbour – across Rd to South	Northern Cement	08 8984 0600
Environmental Regulator	NT EPA (Pollution Hotline)	1800 064 567 8924 4218 (Other)
WHS Regulator	NT WorkSafe	1800 019 115
Darwin Port Operator	Landbridge Pty Ltd	1300 327 946
Hospital	Royal Darwin Hospital Rocklands Drive Tiwi, Darwin	8922 8888
Darwin Region Poisons Info	Poison Information Centre	13 1126

5. INFORMATION ON RESOURCES

5.1. Details of Emergency Resources on Site

- See Site Plans for locations of Hose Reels, Hydrants and Foam points
- SDS are located in the main control room.
- Waste Manifest is located through the GRR Waste Coordinator Office
- Work permits, including task specific risk assessment and mitigation are contained in a folder within the Control room.
- Confines Space High Risk permits will have a rescue plan attached.
- Emergency numbers are displayed on the wall of the Control Room and the lunchroom.

6. RECORDING OF INCIDENT

An incident recording log will be kept. It is essential to log times and description of all actions and events including:

- Incident commencement
- People involved
- Evacuation
- Emergency Services informed
- Management informed
- Neighbours informed
- Mitigation carried out
- Cessation of emergency

After every emergency, there is to be a company investigation into the reason for the emergency, actions taken and improvements to prevent and manage possible future emergencies.

Government authorities may choose to carry out an investigation as well.

7. PLAN REVIEW

The plan is to be reviewed after an emergency, after a change in operation or after a personnel change. Changes are to be recorded and the plan is to be upgraded, redistributed and employees trained.