

## 1) INTRODUCTION

The Pollution Incident Response Procedure has been prepared to set out specific requirements for achieving compliance with the relevant requirements in the POELA Act, 2011. These instructions apply to the Nulon Moorebank site and its associated activities. It is only associated to pollution incidents as defined in Part 5.7A of the POEO Act.

## 2) PURPOSE

To ensure there is a procedure in place in response to a pollution incident and act on it according to EPA requirements Section 3.

- a) Ensure comprehensive and timely communication about pollution incident to:
  - i) Nulon and subcontractor personnel
  - ii) Environmental Protection Authority
  - iii) NSW Ministry of Health
  - iv) WorkCover NSW
  - v) Fire and Rescue NSW
  - vi) Liverpool City Council
  - vii) Wider community outside of the facility who might be affected by the impacts of the pollution incident
- b) Minimise and control the risk of pollution incident at the facility through:
  - i) Identification of risks
  - ii) Development of planned actions'
  - iii) Implement and close out of the planned actions in a timely manner
- c) Ensure that the plan is implemented by
  - i) Trained personnel with responsibility for implementing the plan
  - ii) Regular testing for accuracy, currency and suitability

## 3) DEFINITIONS

**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.

**Notifiable Pollution Incident** means –

A pollution incident is required to be notifiable if there is a risk of 'material harm to the environment, as defined in section 147 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.

**EPA** means –

The Environment Protection Authority constituted by the Protection of the Environment Administration Act 1991.

**PIRMP** – Pollution Incident Response Management Plan

## 4) RESPONSIBILITIES

This process is owned by the company's nominated EPA Officer. The EPA Officer is responsible for training and implementing this plan and also ensures it is tested regularly for accuracy, currency and suitability.

In the case of an actual pollutant incident, the event will be captured in the 'CID Module' of ISOPro system which will detail who, where, what, when, the corrective actions and the action person.

## 5) NULON SITE DESCRIPTION

This procedure is applicable to the Nulon site at 17 Yulong Close, Moorebank, NSW, 2170. (Picture 1 shown below: Satellite layout of the site) This site has a Tanker Loading Bay, Production facility (where blending, filling and packing occurs), Warehouse, Testing Laboratory and Office areas (on mezzanine).

The site generally operates from 6am to about 8pm, five days a week, except for planned extended production hours, visitor hours or shutdown period. Production generally operates from 6am to 2pm and warehouse afternoon shift hours extend to 8pm.

The site generally handles liquid raw materials for the manufacturing of products such as engine oils, gear oils, coolants and marine oils.

Any notifiable dangerous goods kept onsite are maintained by the Warehouse and Production Manager in designated 'Dangerous Goods Cage' (in warehouse) and dangerous good cupboard (in bulk receivable area).

Picture 1: Aerial view of facility.



## 6) DESCRIPTION AND LIKELIHOOD OF HAZARDS

No	Hazard	Likelihood	Summary of Main Pre-Emptive Actions
1	Loss of containment of chemical liquids that may cause environmental damage or personnel safety risk	Low	<p>Bulk Storage vessels and major storage areas have a containment system in place such as bunds, and spillage catchment pits in various locations. The Tank Farm and Blending tanks are enclosed in bund. Large holding tanks are also contained by 'Spillage Pits' (with holding capacity ~4000L) located directly beneath the tanks and next to filling lines. Pits get pumped out periodically by external Service provider (Southern Oil). There are spill kits and Booms located in various locations in Bulk Receivable, Productions and Warehouse area.</p> <p>Refer to <b>Spill Management Procedure</b> for Actions to be taken during or immediately after pollution incident.</p>
2	Fire (general) which may lead to environmental damage or personal safety risk	Low	<p>Nulon has strict controls to ensure there is minimal contact with substances. Bulk Raw Receivables, Blending and Filling processes are generally automated and procedures are in place to reduce the risk of process reactions where fire and explosion could occur. The site has fire detection &amp; smoke alarm system in place throughout the facility which connects to the local Fire brigade service. Emergency evacuation procedures are in place to evacuate site and neighbours if required.</p> <p><b>Refer to Section 15.3 Evacuation Plan and Emergency Evacuation Plan, Section 11 Discovery of a Fire for actions to be taken during or immediately after pollution incident.</b></p>
3	Fire, from an explosion (process reactions) which may lead to environmental damage or personal safety risk	Low	<p>Nulon has strict controls to ensure there is minimal contact with substances. Bulk Raw Receivables, Blending and Filling processes are generally automated and procedures are in place to reduce the risk of process reactions where fire and explosion could occur.</p> <p>Any products classed as dangerous or flammable are stored in designated dangerous cage or cupboard. The site has fire detection &amp; smoke alarm system in place throughout the facility which connects to the local Fire brigade service. Emergency evacuation procedures are in place to evacuate site and neighbours if required.</p> <p><b>Refer to Section 15.3 Evacuation Plan and Emergency Evacuation Plan, Section 11 Discovery of a Fire for actions to be taken during or immediately after pollution incident.</b></p>

## 7) INVENTORY OF POLLUTANTS

Refer to List of Nulon Potential Pollutants (Section 17 - Appendix C).

Nulon Products Australia stores, handles and uses a large number of chemicals in its production processes and has a comprehensive system for safe handling of such chemicals as well as others:

- a) Hazardous Chemical Register
- b) Safety Data Sheets (located in various locations throughout the plant)
- c) Procedure for safe storage and used of chemicals on site

## 8) SAFETY EQUIPMENT

- a) Safety equipment is kept throughout premises in production, warehouse and offices.
- b) Labeled container Spill kit stations with absorbent pads and rags are located in various locations throughout the premises.

## 9) TYPES OF INCIDENTS TO BE NOTIFIED

According to the Guidelines, those incidents that occur in the course of an activity so that “material harm” to the environment is caused or threatened are to be reported.

A pollution incident is required to be notifiable if there is a risk of ‘material harm to the environment, as defined in section 147 of the POEO Act as:

- a) Harm to the environment is material if:
  - iii) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - iv) 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.

### **Note on exclusions:**

- a) Definition of “Pollution Incidents” excludes **Noise**.
- b) A person is not required to notify a pollution incident under section 148 of the POEO Act if the incident is an ordinary result of action required to be taken to comply with an environment protection licence, an environment protection notice or other requirement of or made under this Act.

## 10) WHOM TO BE NOTIFIED IN THE EVENT OF POLLUTION INCIDENT

(Please refer to *Section 16.1 EPA Notification Procedure*)

## 11) RELEVANT INFORMATION TO BE GIVEN WHEN NOTIFYING THE INCIDENT

The relevant information to be given according to section 150 of the POEO Act (1997) when notifying the incident to the regulatory authorities is as follows:

- a) Time, Date, Nature, Duration and Location of the Incident
- b) Location of the place where pollution is occurring or is likely to occur
- c) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- d) The circumstances in which the incident occurred (including the cause if known)
- e) Action taken or proposed action to be taken to deal with the incident, any resulting pollution or threatened pollution, if known.
- f) Other information prescribed by the regulations.

## 12) COMMUNICATING WITH NEIGHBOURS AND LOCAL COMMUNITY

Neighbors and local community who may be affected by pollution incident will be notified (see Section 16.2) of emergency early warning and regular updates either through several mechanisms via direct phone calls, sms, door knocking, emails or other online media such as Facebook, Twitter as appropriate to the circumstances.

### 13) TESTING OF PLAN, AVAILABILITY AND TRAINING

- a) This PIRMP will be available on the Nulon website and will be supplied free of cost of anyone requesting the plan in writing within 14 days of the request being made.
- b) This plan will be tested routinely once every 12 months. This plan is also tested within one month of the occurrence of any “pollution incident”.
- c) Training for this procedure will be carried out by the EPA Officer and records are kept in ISOPro. Training module.
- d) Review and update of this procedure will be done every 2 years or as required.

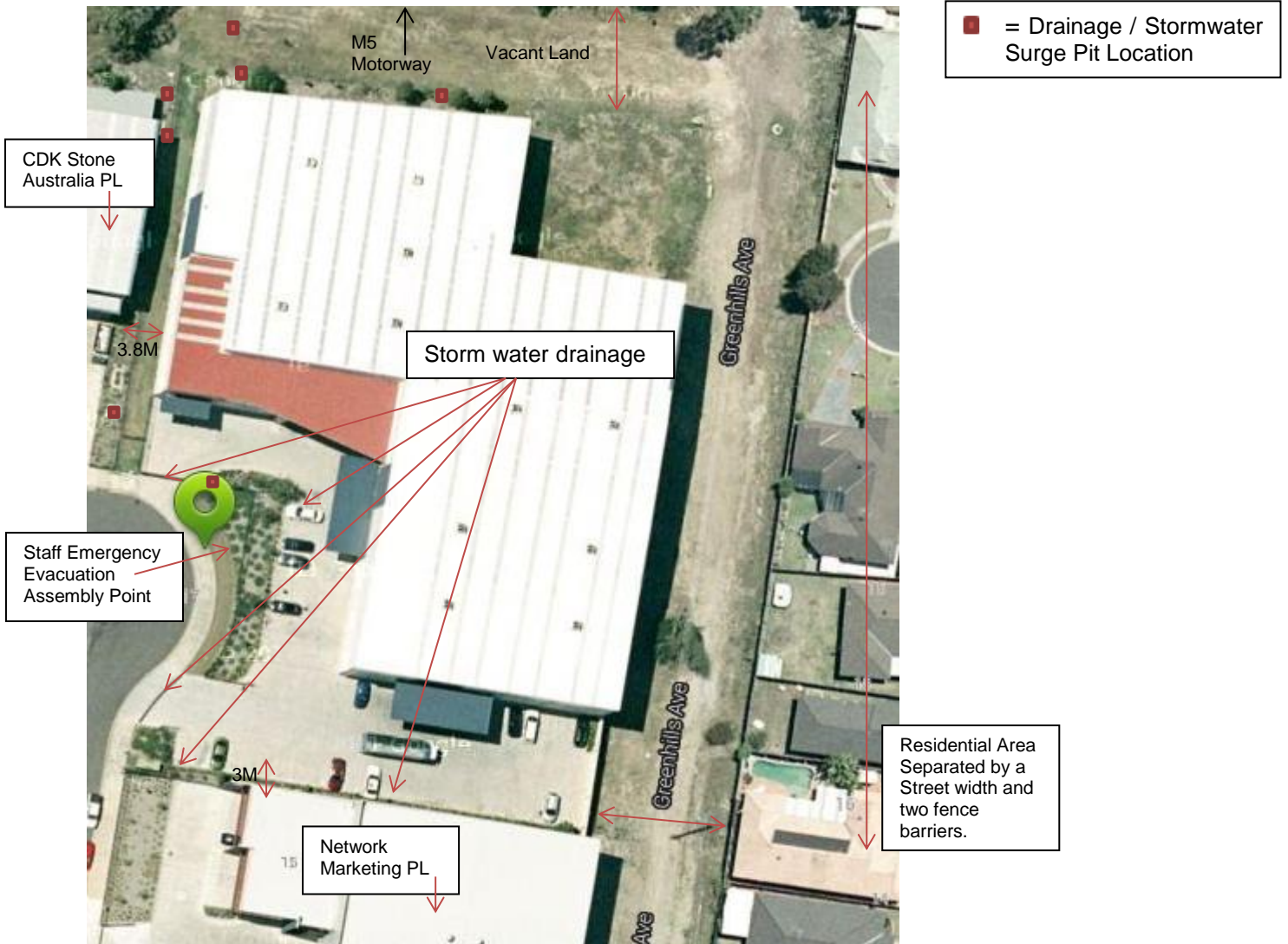
### 14) References:

- a) Emergency Evacuation Plan
- b) EPA Environmental Guidelines: Preparation of Pollution Incident Response Management Plans

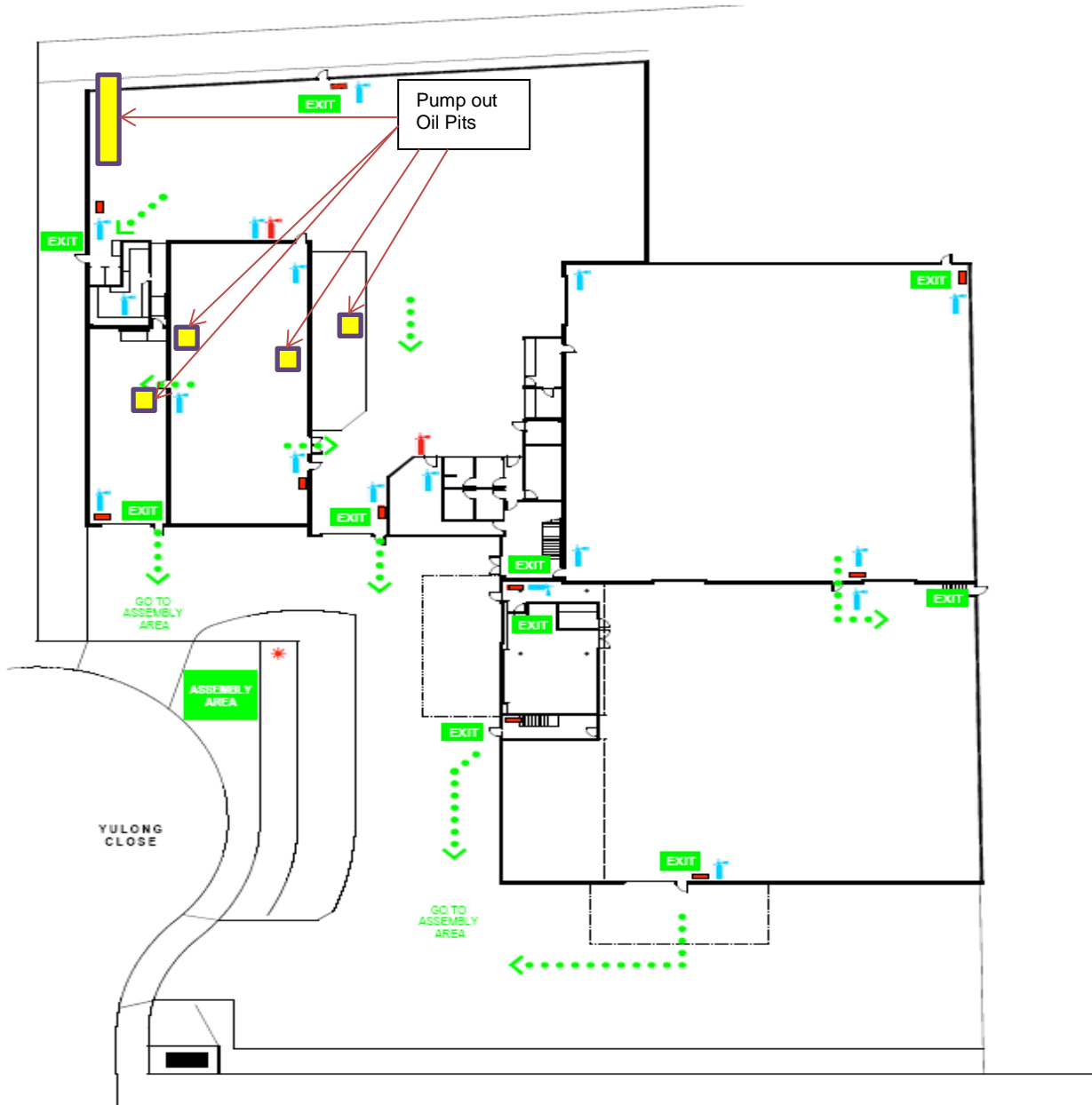
Owner:	<i>EPA Officer (Operations Manager)</i>
Approved By:	<i>Operations Manager</i>
Date Approved:	<i>25/5/2015</i>
Due for Review:	<i>2 years</i>
<a href="#">Related Policies/Documents</a>	<b>Policies:</b> <i>N/A</i> <b>Procedures:</b> <i>Emergency Evacuation Plan</i> <i>Spill Management Procedure</i> <b>Work Instructions:</b> <i>N/A</i> <b>Documents:</b> <i>N/A</i>

## APPENDIX A

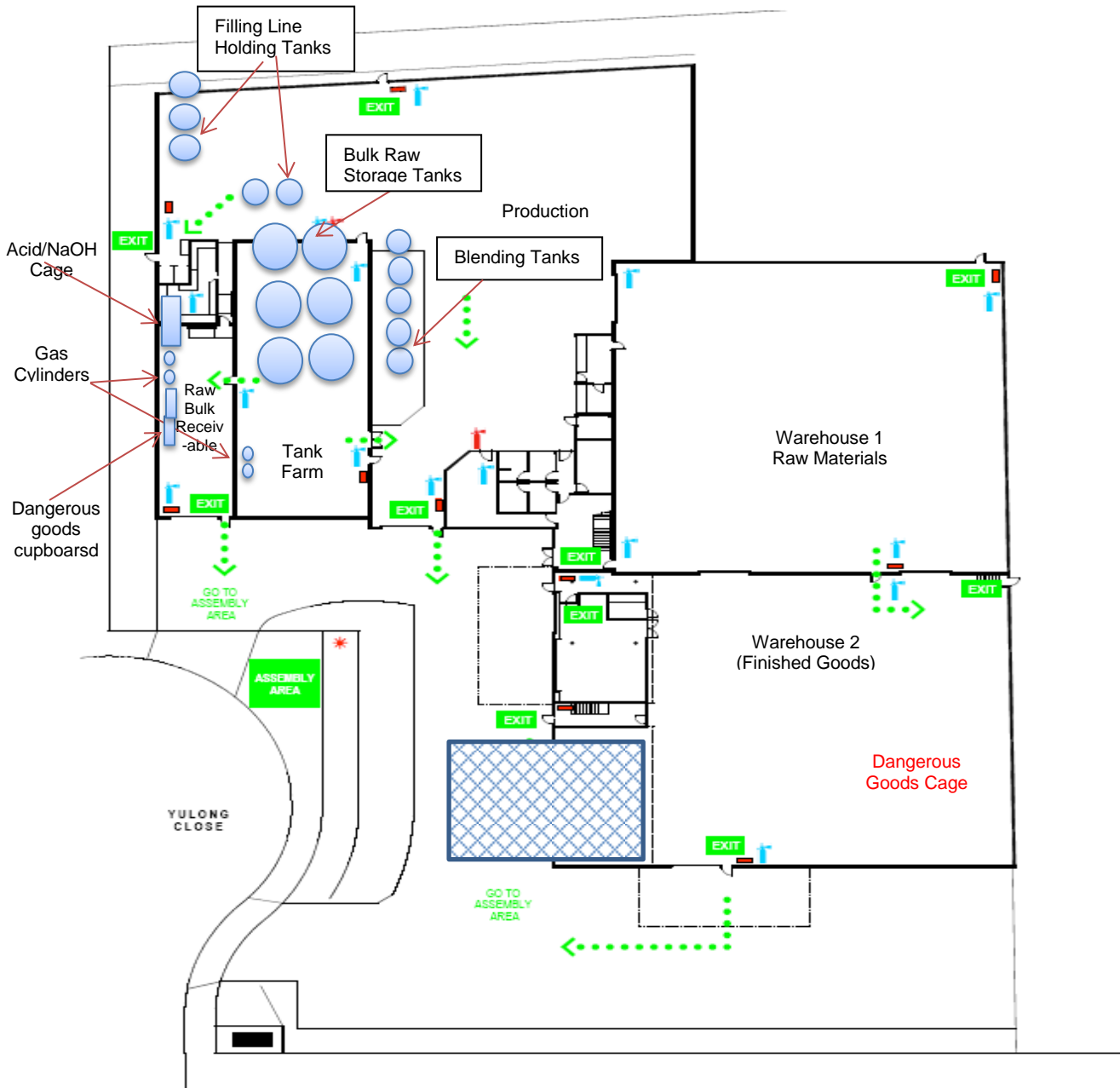
### 15.1 Map of Location Neighbours, Motorway, Vacant Land and Stormwater discharge/drainage and Local River (closest river, Georges River 5.6km from Nulon)



## 15.2 Location of Pump-Out Pit for Oil Wastes



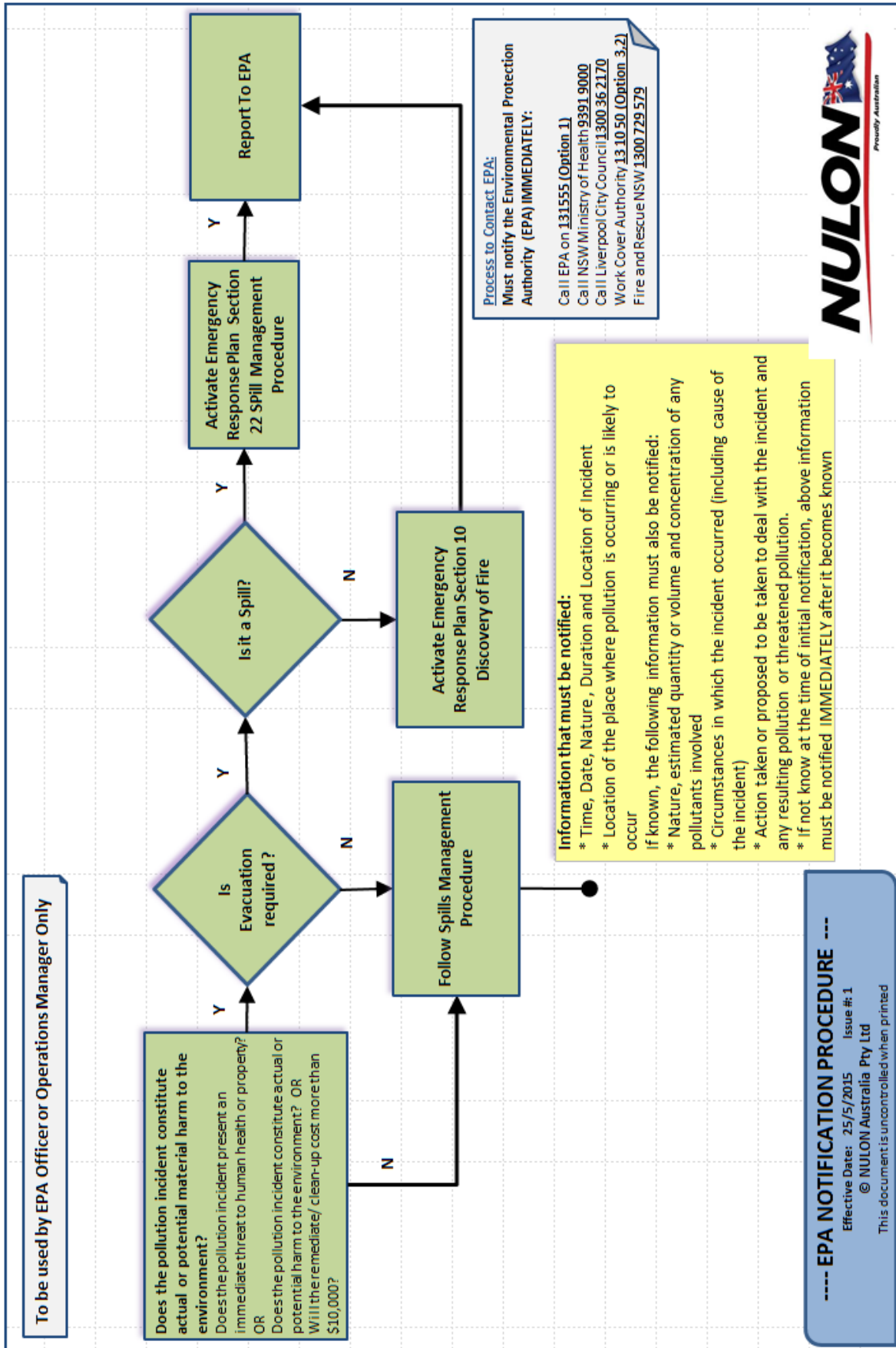
## 15.3 Evacuation Plan





16) APPENDIX B

16.1 EPA Notification Procedure Flowchart



## 16.2 - Contact Details

### Nulon Environment Emergency Contact List

INTERNAL CONTACT					
Name	Last Name	Contact No		Position	Nulon Communications Responsibility
		Telephone	Mobile		
Sam	Kilada	9608 7813	0450 172 997	EPA Officer (24hr Contact)	EPA Officer
Ian	Johnston	9608 7821	0402 642 263	Chief Fire Warden	
Gabriella	Gutierrez	9608 7809	0406 401 124	First Aid Officer / WHS Manager	
Carolynn	Wade	9608 7841	0419 011 963	Production Manager	
CONTACT DETAILS OF RELEVANT AUTHORITIES TO BE NOTIFIED OF POLLUTION INCIDENT					
Name		Telephone	Address or Email		Nulon Communications Responsibility
<i>When there is threat to human health or property, contact in order as listed.</i>					
<b>1. Emergency Fire &amp; Rescue NSW</b>		<b>000</b>	NA		EPA Officer
<b>2. Appropriate Regulatory Authority</b>					
EPA (Environment Protection Authority)		131 555 - (Option 1)	<a href="mailto:info@environment.nsw.gov.au">info@environment.nsw.gov.au</a>		
NSW Health (Public Health Unit)		02 9391 9000			
Work Cover Authority NSW		13 10 50 - (Option 3, 2)	<a href="mailto:contact@workcover.nsw.gov.au">contact@workcover.nsw.gov.au</a>		
Liverpool City Council (pollution incident)		1300 36 2170	<a href="mailto:lcc@liverpool.nsw.gov.au">lcc@liverpool.nsw.gov.au</a>		
Fire and Rescue NSW*		1300 729 579	<a href="mailto:info@fire.nsw.gov.au">info@fire.nsw.gov.au</a>		
Liverpool Fire Station Local Police		9824 0521 9821 8444			
*Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.					
COMMUNITY CONTACT					
CDK Stone Australia P/L Ph: 9822 5155	0417312144	Jennifer Nash	20 Yulong Close, Moorebank		HR./EPA Officer
	0404223267	Liam Clyne			
Nulon Marketing and Sales Team	0409071685	Greg Simons	15 Yulong Close Moorebank		
	0418219731	John Simons			
M5 Motorway	02 9825 1000		<a href="mailto:irpl@interlinkroads.com.au">irpl@interlinkroads.com.au</a>		
Neighbouring Community/ Residential Houses	Phone Call, Door knocking and Social Media				

## 17) APPENDIX C

### LIQUID POLLUTANT INVENTORY 25/02/2014

**Liquid Pollutant Inventory Table**

CATEGORY	TOTAL ( kilograms )	TOTAL ( Tonnes )
Combustible Liquid C1a Flash Point 60 - 93 deg. C	74,938	74.9
Combustible Liquid C1b Flash Point 93 - 150 deg. C	164,904	164.9
Combustible Liquid C2 Flash Point above 150 deg. C	744,458	744.5
Water Based	117,361	117.4
Dangerous Goods ADG Code Class 2.1 Aerosols	15,939	15.9