Pollution Incident Response Management Plan

NULON PRODUCTS AUSTRALIA PTY LTD
1. INTRODUCTION

The Pollution Incident Response Procedure has been prepared to set out specific requirements for achieving compliance with the relevant requirements in the POEO (SECTION 153C) and be in the form required by POEO (G) clause 98B). 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

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

b) To ensure comprehensive and timely communication about pollution incident to:
   - Nulon and subcontractor personnel
   - Environmental Protection Authority
   - NSW Ministry of Health
   - WorkCover NSW
   - Fire and Rescue NSW
   - Liverpool City Council
   - Wider community outside of the facility who might be affected by the impacts of the pollution incident
   - Minimise and control the risk of pollution incident at the facility through:
     - Identification of risks
     - Development of planned actions
     - Implement and close out of the planned actions in a timely manner

  c) Ensure that the plan is implemented by:
     - Trained personnel with responsibility for implementing the plan
     - Regular testing for accuracy, currency and suitability.

3. DEFINITIONS

<table>
<thead>
<tr>
<th>PIRMP</th>
<th>Pollution Incident Response Management Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPA</td>
<td>The Environment Protection Authority</td>
</tr>
<tr>
<td>POEO</td>
<td>Protection of the Environment Operations (General) Regulation 2009</td>
</tr>
</tbody>
</table>

Pollution Incident

Pollution incident means an incident or set of circumstances during or as 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.

Material Harm

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 of the POEO act as:

Harm to the environment is material if:

i) It involves actual or potential harm to the health or safety of human beings or to ecosystem 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

iii) 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.
4. RELATIONSHIP WITH OTHER DOCUMENTS

This PIRMP has been developed to be consistent with Nulon’s Emergency Response Manual (ERM) and Spill Management Procedure.

The ERM will be activated in the event that an incident is a direct threat to health of staff, contractors and visitors onsite.

5. REGULATORY REQUIREMENTS

Specific detail is required for inclusion in the PIRMP. The below table lists information mandated under section 153C of the POEO act and clause 98C of the (General) Regulation 2009 and details where this information is located in this document.

<table>
<thead>
<tr>
<th>Section 153C</th>
<th>Detail required</th>
<th>Location in document</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>A description of the hazards to human health or the environment associate with the activity to which the license related (the relevant activity),</td>
<td>Section 15 &amp; 26 Appendix A</td>
</tr>
<tr>
<td>(b)</td>
<td>the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,</td>
<td>Section 15</td>
</tr>
<tr>
<td>(c)</td>
<td>details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,</td>
<td>Section 16</td>
</tr>
<tr>
<td>(d)</td>
<td>an inventory of potential pollutants on the premises or used in carrying out the relevant activity,</td>
<td>Appendix A</td>
</tr>
<tr>
<td>(e)</td>
<td>the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,</td>
<td>Appendix A</td>
</tr>
<tr>
<td>(f)</td>
<td>a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,</td>
<td>Section 17</td>
</tr>
<tr>
<td>(g)</td>
<td>the names, positions and 24-hour contact details of those key individuals who: i) are responsible for activating the plan, and ii) are authorised to notify relevant authorities under section 148 of the Act, and iii) are responsible for managing the response to a pollution incident,</td>
<td>Section 9 &amp; 16(D)</td>
</tr>
<tr>
<td>(h)</td>
<td>the contact details of each relevant authority referred to in section 148 of the Act,</td>
<td>Section 9</td>
</tr>
<tr>
<td>(i)</td>
<td>details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,</td>
<td>Section 7</td>
</tr>
<tr>
<td>(j)</td>
<td>the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,</td>
<td>Section 18</td>
</tr>
<tr>
<td>(k)</td>
<td>a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,</td>
<td>Section 10 to 13</td>
</tr>
<tr>
<td>(l)</td>
<td>a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,</td>
<td>Section 16</td>
</tr>
<tr>
<td>(m)</td>
<td>the nature and objectives of any staff training program in relation to the plan,</td>
<td>Section 23</td>
</tr>
<tr>
<td>(n)</td>
<td>the dates on which the plan has been tested and the name of the person who carried out the test,</td>
<td>Section 24</td>
</tr>
<tr>
<td>(o)</td>
<td>the dates on which the plan is updated,</td>
<td>Section 24</td>
</tr>
<tr>
<td>(p)</td>
<td>the manner in which the plan is to be tested and maintained</td>
<td>Section 23</td>
</tr>
</tbody>
</table>
6. 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.

7. NULON SITE DESCRIPTION

The site consists of two neighboring building at end Yulong Close (a cul-de-sac), combined production, warehousing and administration complexes.

The building construction is steel frames and prefabricated concrete panels.

The blending & packaging area at 17 Yulong Close is divided into various sections which include a blending/production area, two warehouse areas, bulk storage and bulk delivery areas. The warehouse and blending/production area are separated by concrete walls with access between the areas via sliding fire doors which operate in an emergency by VESDA and (smoke detection) systems.

There is an administration area attached to the warehouse complex and these consist of open plan and individual offices.

The site has small quantities of dangerous goods onsite and bulk oil products. There are Safety Data Sheets available at various locations throughout the site and there is Hazchem register at the front gate for the fire brigade.

The site is located in the commercial area on the southern side of the M5 Freeway between the freeway and the Holsworthy Military Facility. The property is at the end of a busy cul-de-sac which limits access and restricts the options for an evacuation assembly area.

The site has approximately 65 occupants in which can fluctuate over the course of the working day due to the shift pattern.

8. OPERATING HOURS

The general hours of operation are Monday to Friday from 6:30am to 5:00pm although overtime is conducted as needed as listed below. The closest cross street to the site is to the south and is Anzac Road.

Building Hours:

<table>
<thead>
<tr>
<th>Day of Week</th>
<th>General Office</th>
<th>Production</th>
<th>Warehouse</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday</td>
<td>8:00am – 5:00pm</td>
<td>6:30am – 9:45pm</td>
<td>6:30am- 9:45pm</td>
</tr>
<tr>
<td>Tuesday</td>
<td>8:00am – 5:00pm</td>
<td>6:30am – 9:45pm</td>
<td>6:30am- 9:45pm</td>
</tr>
<tr>
<td>Wednesday</td>
<td>8:00am – 5:00pm</td>
<td>6:30am – 9:45pm</td>
<td>6:30am- 9:45pm</td>
</tr>
<tr>
<td>Thursday</td>
<td>8:00am – 5:00pm</td>
<td>6:30am – 9:45pm</td>
<td>6:30am- 9:45pm</td>
</tr>
<tr>
<td>Friday</td>
<td>8:00am – 5:00pm</td>
<td>6:30am – 9:45pm</td>
<td>6:30am- 9:45pm</td>
</tr>
<tr>
<td>Saturday</td>
<td>7:00am – 3:00pm</td>
<td>7:00am – 3:00pm</td>
<td></td>
</tr>
<tr>
<td>Sunday</td>
<td>Closed</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
9. CONTACT DETAILS

Table below summaries the names, position titles and 24 hour contact details of the key individuals responsible for managing incident response and notifying the relevant authorities.

### Nulon Environment Emergency Contact List

#### INTERNAL CONTACT

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Contact Numbers</th>
<th>Position</th>
<th>Nulon Communications Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Andrew</td>
<td>Ball</td>
<td>9608 7800 0439 443 868</td>
<td>Head of Operations</td>
<td>EPA Officer</td>
</tr>
<tr>
<td>Mike</td>
<td>Sharman</td>
<td>9608 7814 0409 170 501</td>
<td>Chief Fire Warden</td>
<td></td>
</tr>
<tr>
<td>Gabriella</td>
<td>Gutierrez</td>
<td>9608 7809 0406 401 124</td>
<td>HR/WHS Manager &amp; EPA Officer (24hr Contact)</td>
<td></td>
</tr>
<tr>
<td>Ashneel</td>
<td>Goundar</td>
<td>9608 7802 0405 779 539</td>
<td>Production Manager</td>
<td></td>
</tr>
</tbody>
</table>

#### CONTACT DETAILS OF RELEVANT AUTHORITIES TO BE NOTIFIED OF POLLUTION INCIDENT

*When there is threat to human health or property, contact in order as listed.*

1. **Emergency Fire & Rescue NSW**
   - Telephone: 000
   - Contact: N/A

2. **Appropriate Regulatory Authority**
   - EPA (Environment Protection Authority)
     - Telephone: 131 555 - (Option 1)
     - Email: info@environment.nsw.gov.au
   - NSW Health (Public Health Unit)
     - Telephone: 9391 9000
   - Work Cover Authority NSW
     - Telephone: 13 10 50 - (Option 3, 2)
     - Email: contact@workcover.nsw.gov.au
   - Liverpool City Council (pollution incident)
     - Telephone: 1300 36 2170
     - Email: lcc@liverpool.nsw.gov.au
   - Fire and Rescue NSW*
     - Telephone: 1300 729 579
     - Email: info@fire.nsw.gov.au
   - Liverpool Fire Station Local Police
     - Telephone: 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

<table>
<thead>
<tr>
<th>Business Name</th>
<th>Contact Numbers</th>
<th>Address or Email</th>
<th>Nulon Communications Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDK Stone Australia P/L</td>
<td>0417 312 144</td>
<td>Jennifer Nash 20 Yulong Close, Moorebank</td>
<td>HR/EPA Officer</td>
</tr>
<tr>
<td>Ph: 9822 5155</td>
<td>0404 223 267</td>
<td>Liam Clyne 13 Yulong Cl, Moorebank</td>
<td></td>
</tr>
<tr>
<td>Wizardry Imaging &amp; Signs</td>
<td>(02) 9821 7600</td>
<td>Phone Call, Door knocking and Social Media (Facebook) Wattle Grove community events page.</td>
<td></td>
</tr>
<tr>
<td>M5 Motorway</td>
<td>9825 1000</td>
<td><a href="mailto:irpl@interlinkroads.com.au">irpl@interlinkroads.com.au</a></td>
<td></td>
</tr>
</tbody>
</table>
11. SITE MAP – 17 YULONG CLOSE, MOOREBANK
12. INVENTORY OF POLLUTANTS

Refer to List of Nulon Potential Pollutants (Section 22 – Appendix A).

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 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

13. DESCRIPTION AND LIKELIHOOD OF HAZARDS

<table>
<thead>
<tr>
<th>No</th>
<th>Hazard</th>
<th>Likelihood</th>
<th>Summary of Main Pre-Emptive Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Loss of containment of chemical liquids that may cause environmental damage or personnel safety risk</td>
<td>Low</td>
<td>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 filling tanks are also contained by ‘Spillage Pits’ (with holding capacity ~4000L) located directly beneath the tanks and next to filling lines. There are spill kits and Booms located in various locations in Bulk Receivable, Productions and Warehouse area. Refer to Spill Management Procedure for Actions to be taken during or immediately after pollution incident.</td>
</tr>
<tr>
<td>2</td>
<td>Fire (general) which may lead to environmental damage or personal safety risk</td>
<td>Low</td>
<td>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. 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.</td>
</tr>
<tr>
<td>3</td>
<td>Fire, from an explosion (process reactions) which may lead to environmental damage or personal safety risk</td>
<td>Low</td>
<td>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. 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. 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.</td>
</tr>
</tbody>
</table>
14. **SPILL MANAGEMENT**

a) **Purpose**

This document outlines procedures for the management of chemical spills that may occur on site, to minimise the effects on health and safety from exposure to chemical spills and to reduce the impact on the environment.

b) **Scope:**

The procedure applies to any events that result in the uncontained spill of any hazardous substance within the Nulon Products Australia Pty Ltd.

These instructions apply to all Nulon Products employees.

These instructions are in place to handle spillages on site.

c) **Definitions**

Bund - A bund is a small wall or barrier that restricts the flow of substances and contains them in a particular area. Nulon Products Bunded areas are: Production Blending & filling area, Tank farm and Tanker unloading bay.

SDS - Safety Data Sheets (formerly known as Material Safety Data Sheet MSDS) provide workers with information such as physical data (melting point, boiling point, flash point, etc.), toxicity, health effects, first aid, reactivity, storage, disposal, protective equipment, and spill-handling procedures.

d) **Roles and Responsibilities**

The CEO, Managers and Laboratory Supervisors are responsible for ensuring that:

- This procedure is implemented within their area of responsibility
- Chemical spill kits and appropriate PPE are maintained, clearly labelled and checked during the workplace inspection process
- Safety data sheets (SDS) are available to be used in the event of a spill. Please see marked locations around the premises on site plans.
- Production and Warehouse staff receives appropriate training to deal with chemical spills. (Please refer to Minor & Major spill process)
- All incidents arising from chemical spills are reported through ISOPro system.
- All Staff and contractors are responsible for ensuring that they:
  i) Do not place themselves or others at risk of injury due to spill
  ii) Keep clear of a spill when alerted to an incident
  iii) Clean up a chemical spill immediately and/or report the spill to their supervisor or manager
  iv) Know where safety data sheets are kept, or how they can be accessed
  v) Follow specific written procedures provided for spill control. Minor & Major Process.
e) **Defining Major or Minor Spill**

Spills will be either: minor or major, depending on the volume, location and hazard of the substance spilt. Please use the “Spillage response matrix” to define Major or Minor spill response.

f) **Major Spill Response**

- **Identify** the chemical/s and hazards involved (SDS, label) and use the information on the physical and chemical properties of the material to judge response
- **Protect yourself.** Do not touch any harmful substance. Be aware that fumes may pose a risk.
- **Evacuate.** If possible, as you leave, turn off any ignition sources. i.e. blending tank, line machinery & forklift.
- **Isolate and control access to the spill area.** Do not allow non-essential personnel to enter the spill area.
- **Raise the alarm.** Contact the Production Manager or Chief Fire warden, supervisor or nearest building warden. Manager or Chief Fire warden will advise reception (ext 800) to notify Emergency Services if necessary. Provide the following information: - Name and telephone number of caller - Building area and where the incident occurred - Name and type of material - Known hazard of the materials - Amount of material spilled - Explanation of what happened - Condition of any injured personnel - Status of area. E.g. Is the spillage contained or not contained.
- **Apply first Aid.** Refer to the SDS for the chemical and treat contaminated individuals. If required, summon a First Aid Officer, or ambulance. Isolate affected persons and keep on site.
- **Decontaminate.** In conjunction with expert assistance, minimise the spread of contamination and commencement clean up procedures following SDS guidelines.
- **Review.** Once the cleanup is complete, review the area and the SDS guidelines.
- **Record** in ISOPRO

g) **Spillage Response Matrix**

![Spillage Response Matrix Table](image)
h) **Minor Spill Response**

- Identify the chemical/s and hazards involved (SDS, label) and use the information on the physical and chemical properties of the material to judge response.
- Ensure you are wearing correct PPE to respond to the spill.
- Immediately notify others in the area of the spill. Corridors and pathways have a lot of traffic so it is important to alert passers-by of the spill and ensure the area is kept free of traffic.
- If there is chemical exposure to a worker, respond as quickly as possible to administer appropriate first aid.
- Approach with care - many harmful chemicals lack colour or offensive odors. Avoid breathing vapors from the spill. Never assume the chemical is harmless.
- Control the source.
- Contain the spill with a barrier (damming) or use appropriate absorbent material from the spills kit.
- Clean up promptly and thoroughly and neutralise any acids / alkalis.
- Decontaminate the affected area, equipment and clothing and dispose of any contaminated material appropriately.
- Review area when decontamination is complete. Check walkways, floors, stairs, and equipment for contamination or damage.
- Record all spill incidents in the ISOPro system.

i) **Spill Kits**

All areas containing chemicals must have a spill kit available to deal with spills. These kits must be specific and relevant for the nature of the chemicals that are used within the work area.

A spill kit must be clearly labelled, visible and located in an easily accessible position.

All workers must be aware of the location and how to use the spill kit.

Spill kits contents are reviewed during workplace inspections and recorded on ISOPRO.

If items are used from the spill kit arrangements should be made for immediate replacement.

A general spill kit should include:

- **Barrier/Boom** - to contain a spill such as clean, dry sand or a commercial product or boom
- **Absorbent** - Vermiculite for an organic chemical spill
- **Neutralisation reagents** - sodium bicarbonate (acids) or boric acid (alkalis)
- **Gloves** – Gloves appropriate for the chemicals used in the lab (disposable neoprene or nitrile)
- **Specific PPE** for the chemicals used - (dust mask, respirator, face shield)
- **Waste Containers** in which to store waste and contaminated materials - plastic bags or buckets
- **Warning signs.**

**Please refer to annexure A Safe Work Procedure Spills and Leaks- Clean up procedure.**
j) **Storage and Secondary Containment**

Secondary containment is also recommended for the storage of chemicals to prevent the spread of the substance in the event that the primary container breaks. Containers holding solutions must be placed in a spill tray. The spill tray must be able to hold the volume of substance held within the primary container/s.

k) **Decontamination and Disposal**

Dispose of clean-up materials in appropriate bags or plastic buckets. These containers must be compatible with the spilled chemical. Contaminated equipment and clothing must be de-contaminated and if necessary disposed of and replaced. Items that cannot be decontaminated should be disposed of as hazardous waste.

Label the spills waste container with a hazardous waste label and dispose of on the next hazardous collection day.

l) **Injuries From Spills**

Spills of hazardous substances can be harmful if they come into contact with the body and should be treated as serious even if considered minor.

Refer to the SDS for first aid information. Some general guidelines are outlined.

m) **Spills on the Body**

- Remove all contaminated clothing only under a safety shower after the clothing has been thoroughly washed.
- Wash the exposed area with soap and plenty of water for a minimum of 20 minutes.
- Some substances may require more specialised treatment (eg calcium gluconate gel for hydrochloric acid injuries).
- Seek medical advice immediately.

n) **Spills Into the Eyes**

- Flush out the eyes immediately with plenty of fresh tepid low-pressure water or any available sterile eye-wash for at least 20 minutes. Designated eye wash stations are available throughout the production area.
- Seek medical advice immediately.

o) **Incident Reporting**

Major chemicals spills must be reported by completing the Hazard and Incident report online using ISOPro system.

In the event of a building evacuation, the Chief Fire Warden may need to carry out an investigation. An Emergency Evacuation Debrief form must be completed by the Chief Fire Warden.

In the event of an incident defined as “notifiable” by WorkCover, that is, if it “arises out of the conduct of a business or undertaking and results in the death, serious injury or serious illness of a person or involves a dangerous incident”, the area must not be disturbed until any investigation is complete or WorkCover has given authority to do so.
15. 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.

16. MINIMISING HARM TO PERSONS ON THE PREMISES

Nulon has implemented a number of pre-emptive measures to minimize or prevent risk of harm to human health or the environment arising from its activities. These include both engineering controls and administrative controls.

The Emergency Response Manual outlines the procedure to follow when an emergency occurs that requires the evacuation of persons from site. Section 4 describes an alarm system in the case of an emergency:

The indication to “Raise the Alarm” is a reference to this sub-section:

1. Communicate to occupants in the near vicinity the existence of a fire e.g. shout “EVACUATE NOW”.

2. Contact the Area Warden/Warden and/or the Chief Warden by telephone or face to face communication, to give information of the location and type of emergency.

3. Contact the Fire Brigade by dialling 0-000 or 112.

17. 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:
   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.

18. 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.
19. **WHOM TO BE NOTIFIED IN THE EVENT OF POLLUTION INCIDENT**

(Please refer to Section 26 Appendix B EPA Notification Procedure)

20. **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.

21. **COMMUNICATING WITH NEIGHBOURS AND LOCAL COMMUNITY**

Neighbors and local community who may be affected by pollution incident will be notified (see Section 23 Appendix C) 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.

22. **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.

23. **REFERENCES**

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

<table>
<thead>
<tr>
<th>Owner:</th>
<th>EPA Officer (HR &amp; Systems Manager)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approved By:</td>
<td>CEO</td>
</tr>
<tr>
<td>Date Approved:</td>
<td>02/2/2019</td>
</tr>
<tr>
<td>Due for Review:</td>
<td>2 years</td>
</tr>
<tr>
<td>Tested:</td>
<td>30/11/2018</td>
</tr>
</tbody>
</table>

**Related Policies/Documents**

- **Policies:**

- **Procedures:**
  - Emergency Evacuation Plan
  - Spill Management Procedure

- **Work Instructions:**
  - N/A

- **Documents:**
  - N/A
## APPENDIX A

### Hazardous chemicals stored in tanks (other than IBC’s)

<table>
<thead>
<tr>
<th>Tank Id No.</th>
<th>Hazardous chemicals</th>
<th>Sub risk</th>
<th>PG</th>
<th>Type</th>
<th>Capacity</th>
<th>Diameter</th>
</tr>
</thead>
<tbody>
<tr>
<td>TK101</td>
<td>VIVASOL 2046</td>
<td>n/a</td>
<td>n/a</td>
<td>a/g Vertical</td>
<td>25 000 L</td>
<td>2.81m</td>
</tr>
<tr>
<td>TK107</td>
<td>MONO ETHYLENE GLYCOL</td>
<td>n/a</td>
<td>n/a</td>
<td>a/g Vertical</td>
<td>50 000 L</td>
<td>3.36m</td>
</tr>
<tr>
<td>TK109</td>
<td>OAT 5X SUPER CONCENTRATE CLEAR</td>
<td>n/a</td>
<td>n/a</td>
<td>a/g Horizontal</td>
<td>17 000 L</td>
<td>2.75m</td>
</tr>
<tr>
<td>TK112</td>
<td>RADIHIB SC</td>
<td>n/a</td>
<td>n/a</td>
<td>a/g Horizontal</td>
<td>12 000 L</td>
<td>2.75m</td>
</tr>
<tr>
<td>TK113</td>
<td>NB3070 GLYCOOL 670</td>
<td>n/a</td>
<td>n/a</td>
<td>a/g Horizontal</td>
<td>12 000 L</td>
<td>2.75m</td>
</tr>
<tr>
<td>TK114</td>
<td>HOAT 5X COOLANT SUPERCONCENTRATE</td>
<td>n/a</td>
<td>n/a</td>
<td>a/g Horizontal</td>
<td>30000L</td>
<td>2.75m</td>
</tr>
</tbody>
</table>

### Production Filling Area

<table>
<thead>
<tr>
<th>Area</th>
<th>Dangerous goods</th>
<th>Largest quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Name</td>
<td>UN NO.</td>
</tr>
<tr>
<td></td>
<td>Hitec 3062</td>
<td>3281</td>
</tr>
</tbody>
</table>

### Raw Bulk Receivable

<table>
<thead>
<tr>
<th>Area</th>
<th>Dangerous goods</th>
<th>Largest quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Name</td>
<td>UN NO.</td>
</tr>
<tr>
<td>RBR</td>
<td>HYROCHORIC ACID</td>
<td>1789</td>
</tr>
<tr>
<td>RBR</td>
<td>CAUSTIC SODA LIQUID</td>
<td>1824</td>
</tr>
</tbody>
</table>

### Package Store 3 Warehouse @ 15 Yulong Close

<table>
<thead>
<tr>
<th>Area</th>
<th>Dangerous goods</th>
<th>Largest quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Name</td>
<td>UN NO.</td>
</tr>
<tr>
<td>PS3</td>
<td>AEROSOLS</td>
<td>1950</td>
</tr>
</tbody>
</table>
APPENDIX B

EPA Notification Procedure Flowchart

To be used by EPA Officer or Operations Manager Only

---

EPA NOTIFICATION PROCEDURE ---

© NULON Australia Pty Ltd

This document is uncontrolled when printed
**SAFE WORK PROCEDURE**
**MINOR SPILLS AND LEAKS - CLEAN UP PROCEDURE**
Annexure A

**SPECIAL INSTRUCTIONS:**
1. A current SDS of all substances must be kept on hand wherever chemicals are stored, handled or used.
2. A suitable spill control kit containing appropriate spill stops, mop up and clean up materials, together with appropriate PPE should be kept near all chemical storages.

<table>
<thead>
<tr>
<th>Task Sequence</th>
<th>Identified hazards in task</th>
<th>Key processes to be followed</th>
<th>Precautions/ PPE Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Prevention and control of spills and leaks</td>
<td>Integrity of containers, etc</td>
<td>Packages and containers should be stored and handled in a manner which will not expose them to physical damage or falling, etc. Pipelines carrying liquids should be inspected regularly for evidence of leaks or damage, which should be rectified before serious leaks occur. Ensure that valves on pipelines are in operable condition, and shut off flow. Provide means to drain pipelines into suitable receptacles if necessary. Keep supply of pipeline repair fittings and supplies to rectify leaks. Keep containers and drums of liquid closed securely during movement. Handle drums and containers carefully to prevent tipping and falling.</td>
<td>Ensure integrity of pallet racking. Do not overload pallet racking. Keep area around pipelines clear to allow access for inspection. Service valve glands regularly. Receptacles must be able to contain contents of pipeline. Do not transport or move open drums or containers.</td>
</tr>
<tr>
<td>2. Spill control procedures</td>
<td>Hazardous exposure</td>
<td>Areas likely to be adversely affected by spill or leak must be identified beforehand, and evacuation procedures developed, and persons trained. Suitable spill control kits and materials must be obtained and made available in areas where substances are stored, handled or used. Key personnel in each area must be trained in spill control procedures. Suitable means of preventing entry of substances into sewers, drains and waterways must be provided at all likely entry points. Emergency services should be advised of potential spills or leaks, including possible environmental pollutants.</td>
<td>Conduct audit of premises to identify hazards and risk areas. Spill control kits must match the type and size of possible spill. Provide instruction in emergency procedures and use of PPE. Provide suitable drain covers and bunding materials. Provide manifest of substances.</td>
</tr>
<tr>
<td>3. Corrosives (acids, alkalis, hypochlorites)</td>
<td>Exposure to corrosive substances</td>
<td>Procedures to remove persons who may be affected to a safe place must be provided where a spill or leak could result in a risk to health and safety. Train all persons in the implementation of emergency procedures. Emergency shower and eye-wash facilities must be provided in areas where an exposure is likely to occur. Suitable first aid facilities should be readily available in case of exposure.</td>
<td>Provide alternative emergency assembly areas where the areas may be affected by wind-borne substance. Wear eye, hand, body and respiratory protection when dealing with spill or leak of corrosives materials.</td>
</tr>
<tr>
<td>4. Herbicides and pesticides</td>
<td>Environmental hazard</td>
<td>Keep quantity of spill absorbent material close to storage. Avoid breathing vapours, ventilate area, consider evacuation of others. Mop up spilt material and place into sealed containers for disposal. Dispose of spilt material at an approved chemical waste disposal facility. Do not allow spillage or residue to enter drains or watercourses.</td>
<td>Wear eye and hand protection. Wear respiratory protection. Wear respirator for larger spills. Use rubber mats or similar items to prevent entry into drains.</td>
</tr>
<tr>
<td>5. Water-based paints and coatings</td>
<td>Environmental risk</td>
<td>All waste paint, cleaning materials, etc, must be properly labelled and disposed of at an approved chemical disposal facility. Contain spills, use absorbent mats or material to clean up, and prevent spillage entering drains or waterways. Ventilate area to remove paint fumes, prevent fumes entering other areas. Place waste in a properly labelled sealed container or drum for disposal.</td>
<td>Provide suitable containers for the disposal of waste substances. Wear eye and hand protection. Respiratory protection may be required for large spills.</td>
</tr>
<tr>
<td>6. Flammable and combustible liquids</td>
<td>Fire and explosion</td>
<td>Prevent further spill or leak if possible, and only if safe to do so. Eliminate all ignition sources from spill area, evacuate area if necessary. Prevent spill from entering drains and watercourses. If large spill, appropriate personal protective equipment will be required for persons entering area (persons must be specifically trained in procedures to follow in cases of spills of flammable liquids). Soak up spill if possible (Note – material used to soak up spill will also be highly flammable, and must be handled as flammable material). Notify emergency services if threat to persons, property or the environment. Do not allow re-entry into area until area has been decontaminated.</td>
<td>Suitable footwear to be worn. No smoking or ignition sources. Use portable bund or sand bags. Wear body protection (gas suit), self-contained breathing apparatus. Do not dispose of as landfill. Wear PVC gloves, apron, and respirator fitted with appropriate gas filter.</td>
</tr>
<tr>
<td>7. Dry materials, powders</td>
<td>Dust; toxic dust</td>
<td>Cover spill with tarpaulin or other cover to prevent spread of dust by wind. Close windows to prevent entry of wind into spill area if indoors. Use suitable tools or implements to pick up material and place into bags. Contaminated material should be disposed of according to local regulations. Use industrial vacuum cleaner to clean up residual dust in spill zone.</td>
<td>P1 dust mask or particulate filter must be worn. Wear eye and hand protection. Avoid spilling dust in work area. Avoid inhaling dust.</td>
</tr>
<tr>
<td>8. Gas leak</td>
<td>Flammable gas Toxic gas</td>
<td>Shut off gas supply at cylinder or drum, or main shut off valve. Eliminate all ignition sources in area and downwind. Consider evacuation of area if leak cannot be fully shut down. Do not enter area unless appropriate respirator and PPE is worn. Shut off gas supply at cylinder or drum. Evacuate area and areas downwind which may be affected by spread of gas.</td>
<td>Wear eye and hand protection. Eliminate ignition sources. Advise emergency services. Wear eye, hand and respiratory protection. Advise emergency services.</td>
</tr>
</tbody>
</table>

**PRECAUTIONS:**

The following precautions are to be observed, and suitable safety and warning signs as indicated displayed in areas where these procedures are carried out.