POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENSEE:

TISMOR HEALTH & WELLNESS PTY. LTD.

PREMISES:

Tismor Health & Wellness

19A Garema Circuit, Kingsgrove NSW 2208

I. BACKGROUND

The Protection of the Environment Legislation Amendment Act 2011 was assented to on 16 November 2011 which the new requirements for the management and notification of pollution incidents by all Environmental Protection Agency (EPA) License holders.

These new requirements involve the occupier of the premises, the employer or any person carrying on the activity on which a pollution incident occurs to *immediately* notify each of the relevant authorities when material harm to the environment is caused or threatened.

II. PURPOSE

The purpose of the plan is to define the actions to be taken to prepare, keep, test and implement a pollution incident response management plan for Tismor Health & Wellness Pty. Ltd as defined in the Protection of the Environment Legislation Amendment Act 2011.

This plan provides guidelines for:

- Preparing the Pollution Incident Response Management Plan (PIRMP)
- Keeping the PIRMP at the Premises
- Testing the PIRMP in accordance with the regulations
- Implementing the PRIMP in case of an incident

III. SCOPE

This plan applies only to Tismor Health & Wellness Pty Ltd, known as the *Licensee* of EPA License Number 6689 The premises is known as Tismor Health & Wellness, 19A Garema Circuit Kingsgrove NSW 2208.

IV. RELATED DOCUMENTATION

SOP HSE 8 Tismor Disaster Recovery Procedure
SOP HSE 4 Safety Hazards and Near Miss Reporting
SOP HSE 5 Emergency Spill Control Requirements
SOP QA 2 QIDR
R142 DANGEROUS AND HAZARDOUS GOODS MANIFEST REGISTER

V. FACILITY INFORMATION

A. Tismor Health & Wellness Pty. Ltd.

LICENSE NUMBER	6689
LICENSEE	TISMOR HEALTH & WELLNESS PTY LIMITED
LICENSE TYPE	PREMISES
PREMISES	19A GAREMA CIRCUIT KINGSGROVE NSW 2208
SCHEDULED ACTIVITY	CHEMICAL STORAGE
FEE BASED ACTIVITY	CHEMICAL STORAGE WASTE GENERATION
REGION	WASTE OPERATIONS 59-61 GOULDBURN STREET SYDNEY NSW 2000 PHONE: 02 9995 5000 FAX: 02 9995 5900 PO BOX A290 SYDNEY SOUTH NSW 1232

The Pollution Incident and Control Team is responsible for on-site pollution prevention and control. The Pollution Incident and Control Coordinator is also responsible for reporting immediate notifications of releases to the environment.

Pollution Incident and Control Personnel:

****Chris Tisdale-*** *COO*
Working hours- 0404818716
All hours- 1300 165 056
Rami Shnoudeh*- Warehouse Manager*
Ph: 0404818726
Nelson Co*- Work Area: Secondary*
02 95030000
Cynthia Jacobs*- Work Area: Pharma Filling / Flammables / Food*
02 95030000

Person listed with an* are trained and authorized to contact the relevant authorities and communicate with neighbours if and when required.

VI. DEFINITIONS

What is a pollution incident?

'*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, 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.'

When does notification need to be given of a pollution incident?

Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm is 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.'
Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2).
Section 148 of the POEO Act sets out additional pollution incident notification requirements.

VII. PREVENTION OF POLLUTION INCIDENTS

Prevention of pollution incidents can be done through the control of human, machine or equipment performance and physical environment. As such, policies and procedures have been established to protect human health and the environment.

To minimize or prevent the probability of pollution incident occurring, annual review of the current pollution controls will be conducted by the and Quality and Compliance Manager and an appointed site representative/s. The review is carried out to ensure that the information carried out in the plan is accurate and up to date. This assessment shall verify that the plan is capable of being implemented in a workable and effective manner.

Testing of the plan in the form of a Mock Pollution Incident shall be conducted by the HSE Team Representative and Quality and Compliance Manager or delegate and relevant site managers.

This is to ensure that in the event of a pollution incident; the site is capable of reporting, managing and communicating the incident to appropriate regulatory authority.

The following control measures are in place to contain chemical spills and minimise the impact to environment:

- Spill kits, currently on-site, each handle 240L general chemical spills. They are inspected by the supplier every 3 months.
- 3 storm water shut-off valves are to be installed for the major storm water pits that all other pits feed to prior to then releasing to the main stormwater line that sits outside our premises.

The above is to ensure that in the event of a pollution incident; the site is capable of reporting, managing and communicating the incident to appropriate regulatory authority

VIII. ESTABLISHING POLLUTION INCIDENT MANAGEMENT TEAM

Depending on the type and size of the pollution incident, a Pollution Incident Management Team shall be established to perform and coordinate the management and communication of the incident.

The Pollution Incident Management Team shall be led and coordinated by the site General Manager or Delegate and the Site Emergency Coordinator or Deputy Coordinator.

Additional resources are to be determined based on the type of incident and may include the following:

- Company Directors and CEO
- Associate Director
- OH&S Committee Chairman and/or Member/s
- COO
- Engineering Manager
- Quality & Compliance Manager
- Production Supervisor
- Warehouse Manager

IX. DETAILS OF PRESENT SITE

Tismor Health & Wellness Pty Ltd manufactures therapeutic products. Manufacturing activities on site include receipt of raw materials and packaging, dispensing, compounding, testing, packing and storage of goods prior to dispatch to customers.

Manufacturing site – located at 19A Garema Circuit, Kingsgrove NSW 2208 which is in a light industrial area.

The site is primarily a Therapeutic Products and Dry Food Blends manufacturing plant, within which licensable products are manufactured.

Manufacturing is carried out under Good Manufacturing Practice (GMP) conditions. The plant site is located in an industrially zoned part of Kingsgrove. Kingsgrove being a suburb of Sydney, New South Wales.

The company is located in a light industrial area. Immediate neighbours are a coffee producer and a paper recycler.

The facility is approximately 5,000 square meters in area and is situated on a 2-hectare block.

X. DESCRIPTION AND LIKELIHOOD OF HAZARDS

1. Storage of Chemicals

Register is kept and maintained for all Dangerous Goods stored or handled on site. SDS for each Dangerous Goods are stored in the SDS Box located in the building.

Dangerous Goods register is maintained and updated by the site annually.

these are stored in the following locations (Table 1):

Table 1: List of Dangerous Goods and Maximum Quantities Permitted to be Stored on Site

Correct Shipping Name	Type of Store Location	Class	Max Qty Stored on Site
Eucalyptus Oil 80-85%	3	Flam Container	125 kg
Eucalyptus Oil 90/95%	3	Flam Container	2500 kg
Eucalyptus Oil 70/75% BP	3	Flam Container	5000 kg
Eucalyptus Oil 70%	3	Flam Container	5000 kg
Eucalyptol	3	Flam Container	20 kg
M* Orange Flavour (PI4085)	3	Flam Container	60 kg
Orange Oil	3	Flam Container	25 kg
M* Lemon Flavour (PI 110320)	3	Flam Container	60 kg
DG*M*Apple Flavour (PI11029)	3	Flam Container	60 kg
DG*Pine Oil 80/85%	3	Flam Container	125 kg
DG*M* Blackcurrant Flavour	3	Flam Container	60 kg
DG*M*Lime Flavour (PI110319)	3	Flam Container	50 kg
DG*M*Berry Flv (PI 110322)	3	Flam Container	60 kg
M*Rosemary Oil BP	3	Flam Container	20 kg
Isopropanol Alcohol (IPA)	3	Flammable Store	300 kg
Ethanol 95 SG	3	Flammable Store	725 kg
Ethanol 95 SG	3	Flammable Store	8000 kg
DG*Ethanol (95SGF4)	3	Flammable Store	800 kg

Correct Shipping Name	Type of Store Location	Class	Max Qty Stored on Site
DG*Ethanol 100SGF3	3	Flammable Store	200 kg
Melaleuca Oil	3	Flammable Store	300 kg
M*ARNICA MONTANA EXT LIQ (5:1)	3	Flammable Store	3 kg
Camphor	4.1	Raw Material Warehouse	250 kg
Potassium Nitrate	5.1	Raw Material Warehouse	800 kg
Sodium Fluoride	6.1	Raw Material Warehouse	50 kg
Sodium Hydroxide 50% Liquid	8	Raw Material Warehouse	200 kg
Sodium Hydroxide 100%	8	Raw Material Warehouse	200 kg
Compound 421182F	9	Raw Material Warehouse	50 kg
Fragrance Insta Fresh	9	Raw Material Warehouse	50 kg
CPD PC40R5581RMI (Fragrance)	9	Raw Material Warehouse	25 kg
Optamint	9	Raw Material Warehouse	120 kg
LAURETH-4 (Ecoteric B20)	9	Raw Material Warehouse	250 kg

2. Storage of Solid Waste

Sources of the site's solid wastes are empty raw material containers (drums, pails, etc), plastic and kraft bags, packaging cardboards, and damaged packaging materials from production.

Shippers and cardboard liners used for packaging materials are collected and returned to the suppliers.

Solid wastes from manufacturing and production are collected daily by Veolia Environmental Services P/L.

3. Storage of Wastewater and Other Liquid Wastes

The Waste Water Plant is protected by bund to contain leaks, spills or overflows.

Sludge is removed as per the site's requirements by Chlorocheck Pty Ltd.

Rejected liquid bulk products are collected and disposed of accordingly by the above-mentioned licensed trade waste collectors and Veolia Environmental Services P/L.

Quantity of wastewater stored on site: 50,000L

4. Potentially Offensive Odour

No condition of the license identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.

Section 129 of the Protection of the Environment Operations Act 1997, provides that the site must not cause or permit emission of any offensive odour from the premises but provides a defense of the emission is identified in the relevant environment protection license as a potentially offensive odour and the odour was emitted in accordance with the conditions of a license directed at minimizing odour.

5. Potential Failure to Meet Noise Limits

Noise from the premises must not exceed:

A. An LA10 (15 minute) noise emission criterion of 70dB(A) from 0700H to 2200H seven days a week

and

B. An LA10 (15 minute) noise emission criterion of 65dB(A) at all times, except as expressly provided by the EPA licence.

Noise from the premises is to be measured or computed at any point within one metre of the premises boundary to determine compliance with condition set at **A**. 5dB(A) must be added if the noise is tonal or impulsive in character.

There is no current requirement set by EPA as to the frequency to conduct noise monitoring. Noise monitoring shall be conducted when there is a warrant to have it done such as valid noise complaint from surrounding neighbours.

XI. RISK ASSESSMENT PROCESS

Consequence of Risk

Level	Description	Example details description
1	Insignificant	No injuries, low financial loses
2	Minor	First aid treatment, on-site release contained, medium financial loss
3	Moderate	Medical treatment required, on-site release contained without side assistance
4	Major	Extensive injuries, loss of production capability, off-site release with no detrimental effect, major financial loss.
5	Catastrophic	Death, toxic release off-site with detrimental effect, huge financial loss

Table 2: Likelihood of Risk

Level	Description	Example details description
A	Almost certain	Is expected to occur in most circumstances
B	Likely	Will probably occur in most circumstances
C	Possible	Might occur at some times
D	Unlikely	Could occur at some times
E	Rare	May occur only in exceptional

Table 3: Risk Analysis Matrix – (Level of Risk)

Likelihood	Consequence				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A (almost certain)	H	H	E	E	E
B (likely)	M	H	H	E	E
C (possible)	L	M	H	E	E
D (unlikely)	L	L	M	H	E
E (rare)	L	L	M	H	H

Table 4: Action Required

E: Extreme risk (Senior Management action required) Isolate immediately and Rectify within 2 weeks	Significant
H: High risk (Senior management action required) Isolate immediately and rectify within 2 weeks	Significant
M: Moderate risk (Management responsibility must be specified) Rectify within a reasonable time frame. An action plan is required for any risks which will not be rectified within 4 weeks which indicates how the risk will be managed and rectified	Not Significant
L: Low risk; (manage by routine procedure)	Not Significant

Table 5: Risk Rating of Site Hazards

Identified Hazard	Likelihood	Consequence	Level of Risk	Associated Risk/s	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Storage of Chemicals	Unlikely	Moderate	Moderate Risk	• Toxic Effects of Chemicals to Human Health • Flammability of Chemicals • Chemicals may enter water drains after spill • Corrosive Effects of Chemicals	• Chemical spill during receipting or transfer of chemicals • Flammable chemicals not stored in the designated flammable depot • Corrosive chemicals not stored in the designated corrosive depot	• Procedures on the receipting and decanting of chemicals are in place. In case of spill, refer to MSDS for the appropriate handling. • Dangerous goods are kept at the designated depot. Incoming Goods Receiver checks delivery invoice and identify which depot the goods will be stored.
Storage of Solid Waste	Rare	Insignificant	Low Risk	• Disposal of Waste • Congested work and storage areas	• Failure to collect waste based on agreed frequency with the licensed waste collected	• Solid wastes from manufacturing and production are collected daily as per agreement with the licensed waste collector.
Storage of Waste Water	Possible	Minor	Moderate Risk	Disposal of Waste	Failure to collect waste based on agreed frequency	

Identified Hazard	Likelihood	Consequence	Level of Risk	Associated Risk/s	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
and other Liquid Waste					with the licensed waste collected	Sludge and other liquid wastes are collected as per agreement with the licensed waste collector.
Potentially Offensive Odour	Unlikely	Minor	Low Risk	Disposal of Waste	Failure to collect waste based on agreed frequency with the licensed waste collected	Sludge and other liquid wastes are collected as per agreement with the licensed waste collector.
Failure to Meet Noise Limits	Unlikely	Minor	Low Risk	Noise exceeding set out in the site's EPA Licence	Worn out rotary valves of Powders Plant Blow down of Compressor	Preventive Maintenance of Rotary Valves Reporting System where Operators are to call attention of Fitters for unusual noise in the powders plant Blow down is done between 0700H to 2200H and is less than 15 minutes to complete.
Fire - Ignition	Unlikely	Minor	Low risk	Accidental ignition by human intervention Deliberate ignition – vandalism	Smoking on site Staff or intruders could target organization	Smoking area dedicated on site and is away from storage of chemicals. Regular housekeeping inspections on site. Police security check before commencing employment.

Identified Hazard	Likelihood	Consequence	Level of Risk	Associated Risk/s	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
						Entrance to the front gate and all entrances require a swipe card which is only issued to permanent Tismor staff. Onsite security access and video surveillance
Chemical/fuel spill	Unlikely	Minor	Low risk	• Toxic Effects of Chemicals to Human Health • Flammability of Chemicals • Chemicals may enter water drains after spill • Corrosive Effects of Chemicals	Inappropriate handing or human error. Vandalism	Limited quantities kept on site. Authorised staff are trained to follow correct chemical and fuel handing procedures. Flammable store can only be accessed by authorized personnel. Police security check before commencing employment. Entrances to the front gate and all entrances require a swipe card which is only issued to permanent staff. Onsite security access and video surveillance

XII. Inventory of Potential Pollutants on Site

Table 6 is the inventory of potential pollutants on site and the maximum quantity stored on site.

Table 6: Inventory of Potential Pollutants

The site obtains and maintains a R142 DANGEROUS AND HAZARDOUS GOODS MANIFEST REGISTER

Correct Shipping Name	Class	Type of storage location
Eucalyptus Oil 80-85%	3	Flam Container
Eucalyptus Oil 90/95%	3	Flam Container
Eucalyptus Oil 70/75% BP	3	Flam Container
Eucalyptus Oil 70%	3	Flam Container
Eucalyptol	3	Flam Container
M* Orange Flavour (PI4085)	3	Flam Container
Orange Oil	3	Flam Container
M* Lemon Flavour (PI 110320)	3	Flam Container
DG*M*Apple Flavour (PI11029)	3	Flam Container
DG*Pine Oil 80/85%	3	Flam Container
DG*M* Blackcurrant Flavour	3	Flam Container
DG*M*Lime Flavour (PI110319)	3	Flam Container
DG*M*Berry Flv (PI 110322)	3	Flam Container
M*Rosemary Oil BP	3	Flam Container
Isopropanol Alcohol (IPA)	3	Flammable Store
Ethanol 95 SG	3	Flammable Store
Ethanol 95 SG	3	Flammable Store
DG*Ethanol (95SGF4)	3	Flammable Store
DG*Ethanol 100SGF3	3	Flammable Store
Melaleuca Oil	3	Flammable Store
M*ARNICA MONTANA EXT LIQ (5:1)	3	Flammable Store
Camphor	4.1	Raw Material Warehouse
Potassium Nitrate	5.1	Raw Material Warehouse
Sodium Fluoride	6.1	Raw Material Warehouse
Sodium Hydroxide 50% Liquid	8	Raw Material Warehouse
Sodium Hydroxide 100%	8	Raw Material Warehouse
Compound 421182F	9	Raw Material Warehouse
Fragrance Insta Fresh	9	Raw Material Warehouse
CPD PC40R5581RMI (Fragrance)	9	Raw Material Warehouse
Optamint	9	Raw Material Warehouse
LAURETH-4 (Ecoteric B20)	9	Raw Material Warehouse

XIII. DESCRIPTION OF SAFETY EQUIPMENT TO MINIMISE RISKS TO HUMAN HEALTH OR ENVIRONMENT

Table 7: Description of Safety Equipment

Identified Hazard	Description of Safety Equipment
Storage of Chemicals	All dangerous goods are stored in the designated depots as illustrated on Dangerous Goods Depot Plan (Drawing 1). Chemicals are received and/or decanted based on the current procedures in place. In case of chemical leak, the site has a Self-Containing Breathing Apparatus (SCBA). A number of employees and members the safety team have been trained to use SCBA.
Storage of Solid Waste	Solid wastes are stored in skip bins provided by the licensed waste collector and are collected as per prescribed frequency.
Storage of Waste Water and other Liquid Waste	Wastewater from manufacturing is diverted to the wastewater treatment plant (separation plant). As required by regulatory bodies, wastewater is treated to meet the trade waste parameters before it is released to the sewer system. Composite and Discrete Samples are collected at a prescribed frequency by Sydney Water and tested by a NATA certified third party laboratory (LabPoint). The samples are taken at the sewer discharge and sampling point. Sludge and other liquid wastes like rejected bulk (work-in-progress) are collected by licensed sludge collectors. These wastes are collected upon the site's request.
Potential Offensive Odour	Sludge and other liquid wastes like rejected bulk (work-in-progress) are collected by licensed sludge collectors. These wastes are collected upon the site's request.
Potential Failure to Meet Noise Limits	There is no current requirement set by EPA as to the frequency to conduct noise monitoring. Noise monitoring shall be conducted when there is a warrant to have it done such as valid noise complaint from surrounding neighbours.

SAFETY EQUIPMENT

The following control measures and safety equipment are in place to contain chemical spills and minimise the impact to environment:

- Spill kits, currently on-site, each handle 240L general chemical spills. They are inspected by the supplier every 3 months.
- 3 major storm water pits that all other pits feed to prior to then releasing to the main stormwater line that sits outside our premises.
- Additionally, various Personal Protective equipment is available on site at all times and these include gloves (for various applications), respirators, safety glasses and protective clothing.

Refer to spill kit and drain location maps in the appendix section at the end of this document.

MINIMISING HARM TO PEOPLE ON THE PREMISES

This site has fitted and installed multiple emergency features and equipment to ensure that injury and damage to the organisation's personnel, plant, equipment, and the immediate and surrounding environment is minimised. These features include:

- Emergency Alert/Evacuation Warning System
- Emergency Alarm Buttons
- Emergency Exits
- Fire Extinguishers
- Fire Hose Reels
- Fire Blankets
- Fire/Smoke Doors, Spill Kits
- Evacuation Assembly Area/s

The site also has in place an Emergency Contacts, a group of employees organised, structured and trained to coordinate the site response and possible evacuation in the case of an emergency as well as communicate with emergency services.

In an extreme situation, the site personnel may need to be evacuated to a safe assembly area. In this case, the PIRMP coordinators will execute the emergency evacuation plan by activating the evacuation alarm manually. When the evacuation alarm is sounded, the site's Workplace Emergency Response Plan is also activated and will be implemented and controlled by the EC.

The PIRMP coordinators will continue to manage and coordinate the Pollution Incident while personnel are assembled in the safe areas allocated for this purpose.

XIV. External Contact Phone Number Listing:

SERVICE	NAME	EMERGENCY CONTACT NO.
Emergency Services	Fire Brigade / Ambulance / Police	000
State Emergency Services		132 500
Electricity	Origin	-131 388
Water	Sydney Water	132 090
Gas	Origin	131 109
Company Doctor	Dr Lieng 177 Elizabeth Dr, Liverpool	02 9826 9000
Insurance Broker Company	Westlawn Insurance Brokers P/L Duncan Saville	02 6618 2407 / 0409 864 483
MSDS Record Keeping	Chemwatch	1800 039 008
Environmental Protection Authority (EPA)	N/A	131 555
Security Firm	Highland Security	1300 445 263
CEO	Tony Siracusa	02 9503 0000/ 0404 818 726
SafeWork	Note: If WorkCover are required, Belinda Jenkins or the CEO are to make contact with them.	
City of Canterbury Council	Phone: (02) 9789 9300 (Business Hours) Fax: (02) 9789 1542	
NSW Police	000 - Emergency	

XV. Incident Management Procedure for Communicating with the Community

A. Definitions of Pollution Incident and Material Harm Incident

A pollution incident is defined as an incident or set of circumstances during or as a consequence of which there is likely to be a leak, spill or other escape or deposit of 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 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.

A material harm incident is defined as an incident that is considered to be causing or threatening material harm which involves actual or potential harm to the health and safety of people or to ecosystems as well as results on actual or potential loss or property damage. The determination of a material harm incident will be made by either the General Operations Manager (relevant on duty authority).

B. Communication with the relevant authorities.

In the case of a material harm incident, prior to any other action, the initial observer must report the issue immediately to the General Manager/CEO/COO (relevant on duty authority) and the site must contact 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents. Simultaneously all evacuation procedures should be implemented for all guests and non-essential staff. However, incident notification will be made as soon as it is safe to do so.

After the initial response to any events that may cause immediate harm to human health or property the General Operations Manager/CEO (relevant duty authority) will determine if the event constitutes an "actual or potential material harm incident". In the event of a "material harm incident" the following authorities need to be contacted as per Section XIII External Contact Phone Number Listing:

- EPA
- Canterbury-Bankstown Council
- NSW Ministry of Health
- Work Cover NSW
- NSW Fire and Rescue
- Sydney Water

In the case of a "material harm incident" the following information must be noted and forwarded to the authorities when they are notified of the incident:

- Time and date.
- Nature and location of the incident.
- Duration of the incident.
- Location of areas that may be affected by the pollution incident.
- Pollutant involved and the estimated quantity/volume and concentration
- Circumstances in which the incident occurred.
- The proposed action to be taken in dealing with the pollutant and any further incidents that may result.

A detailed record should be kept of all steps involved in dealing with each incident and kept on site in case additional information is required. After the initial notification of a material harm incident, it will be the responsibility of the Pollution Incident to coordinate with any authority that is contacted.

If the material harm incident does not pose any threat to human health or property, concurrently with contacting emergency services (000), all possible actions should be taken to control the pollution incident and minimize health, safety and environmental consequences. These actions must be employed to the maximum extent possible to:

- Provide for the safety of people at and within the vicinity of the site; and
- Contain the pollution incident.

C. Notification of Adjacent Companies and Neighbours

In the event of a determined material harm incident, community notification will be undertaken by the Pollution Incident and Control Coordinators.

When contacting adjacent companies and neighbours the following notification process is to be used:

- **Warnings**: in the event of an incident same day face to face contact and telephone notification will be employed to update affected landholders
- **Updates**: follow-up telephone calls will be made to all landholders who were notified in the initial warning. Updated information will be provided if and when it becomes available and necessary to be passed on. Updates will be provided to the community as follows:

    1. Face to face contact or telephone call
    2. Letterbox drops
    3. Publication of updates on Tismor's Website
    4. Emailing of updates
    5. Door-knocking

C. Testing of the Plan

The PIRMP will be tested on an annual basis during the life of the EPA license. Testing will be by way of desktop simulations and/or practical exercises and drills undertaken on site. The PIRMP will also be tested within one month of any pollution incident occurring. Records of testing will be kept on site.

Date to Be tested	Tested by	Details of Test	Next test
01/10/2020	HSE Representatives and POLLUTION INCIDENT & CONTROL SPILL RESPONSE TEAM	Physical spill simulation. Report April 2020	Before end of April 2021

Previous Spill Response tests conducted:

- 19th September 2019

D. Review of PIRMP

The PIRMP will be reviewed every 3 years. The plan will be updated as required based on the current state of the site. Records of PIRMP revisions will be recorded.

E. Staff Training

The objective of staff training are as follow:

- **Individuals** – understand pollution incident procedures, their roles, responsibilities and how to activate these in a pollution incident situation.

- **Multi-Agency Teams -** response teams have detailed understanding of their roles, how to support each other, mobilise, work together to resolve the pollution incident.

Records of staff training will be maintained on site.

XVI. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

Due to the nature of the activities carried out on site and the topography of the site, the most likely pollution incident to occur would be a Chemical spill. The chemical spill could be from non-hazardous raw materials, hazardous raw materials, bulk products or wastewater. The largest containers/tanks kept on site are IBCs which are limited to 1000kg/litres each. Therefore, the largest spill that can occur on site should be limited to 1 or 2 IBCs, equivalent to 2000 litres of spill. The waste-water plant is located inside a bunded area which will contain the volume of the waste-water tank in case of leak or rupture.

a) Spill

The most likely pollution incident to occur on site is Chemical Spill whether it may be Raw Material, Bulk product or waste water. The instant a spill is reported, the extend and the risk need to be immediately evaluated. The following procedure must be followed by the initial observant of the incident and subsequently by the Spill Response team and the PIRMP coordinators:

PROCEDURE
Step 1: Communicate the incident to access assistance and clear the area. Immediately let a co-worker or persons working in the vicinity know of the spill so that they can notify the Spill Response Team.
Step 2: Stop the source if possible and Assess the Risk If it is safe to do so, stop the source. This could simply involve turning a container upright or plugging a leak from a damaged drum or container or simply shutting a valve. Determine the risks that may affect human health, the environment and property. Identify and assess the spill by looking for:

- WHAT has been spilled (look for a label / sign on the source of the spill).
- WHAT has been spilled (look for a label / sign on the source of the spill).
- WHERE is the spill headed?
- What other DANGERS are there?

Step 3: Prevent the spill from exiting the site via the main stormwater drain outlet.

If the spill is large enough and located within access to stormwater drains, it may end up in the drains and escape out of the site into a water source. The Tismor site will be installing 3 stormwater shut valves.

The success of this action will determine if the incident remains localised without endangering people or the environment, or whether the incident becomes a Pollution incident with potential to harm others off site as well as the environment.

Step 4: Select Personal Protective Equipment (PPE)

By this time the Spill Response Team should be at the location of the spill with spill kits and appropriate equipment. Members of the Spill Response Team are also members of the Pollution Incident Control coordination team and will be assessing the extent of the incident with regards to potential to cause material harm.

Consult the SDS, if available, to determine the most appropriate PPE to wear. If the danger is uncertain and the material is unknown, the worst should be assumed, and the highest level of protection used.

Step 5: Confine the Spill and re-assess situation

The extent of the spill area should be limited by blocking, diverting or confining the spill. Use a Spill Kit with appropriate absorbent and blocking materials.

The flow of the spill should be stopped before it has a chance to contaminate a water source – minimising the spill area and protecting stormwater drains are the priorities. The main stormwater drain exit should have been shut by now. However, if the spill has entered other branches of the storm water drain, these must be cleared and cleaned before the main valve is re-opened.

At this stage the situation needs to be re-assessed. If the spill has escaped the site, then the PIRMP must be activated and the relevant authorities notified.

Seek help from your supervisor or other staff if assistance is required.

Step 4: Stop the Source if unable to have done in step 2 This step may happen before the spill is even confined depending on the extent or the size of the spill. This could simply involve turning a container upright or plugging a leak from a damaged drum or container. Once the leak has been stopped the liquids should be transferred from the damaged container to a new one.
Step 5: Evaluate the incident and implement clean-up Once the spill is confined and the leak has been stopped, it is time to reassess the incident and develop a plan of action for implementing the spill clean-up. Using the absorbent materials from Spill Kits, the spill should be cleaned up. Additional materials such as neutralisers, detergents etc may be needed to completely clean the area. Once the absorbents are saturated, they may be considered hazardous waste and should be disposed of properly. It may be necessary to employ professional organisations such as Veolia to assist with clean-up
Step 6: Decontaminate The site, personnel, and equipment should be decontaminated by removing or neutralising the hazardous materials that have accumulated during the spill. This may involve removing and disposing of contaminated media, such as soil, that was exposed during the spill incident. PPE may be able to be reused after inspection and clean-up. An effective decontamination area should also be created to ensure the health and safety of emergency responders.
Step 7: Complete Incident Form As soon as possible after the spill, an incident reports should be completed and entered onto the Reporting System.

DOCUMENT CHANGE CONTROL PAGE

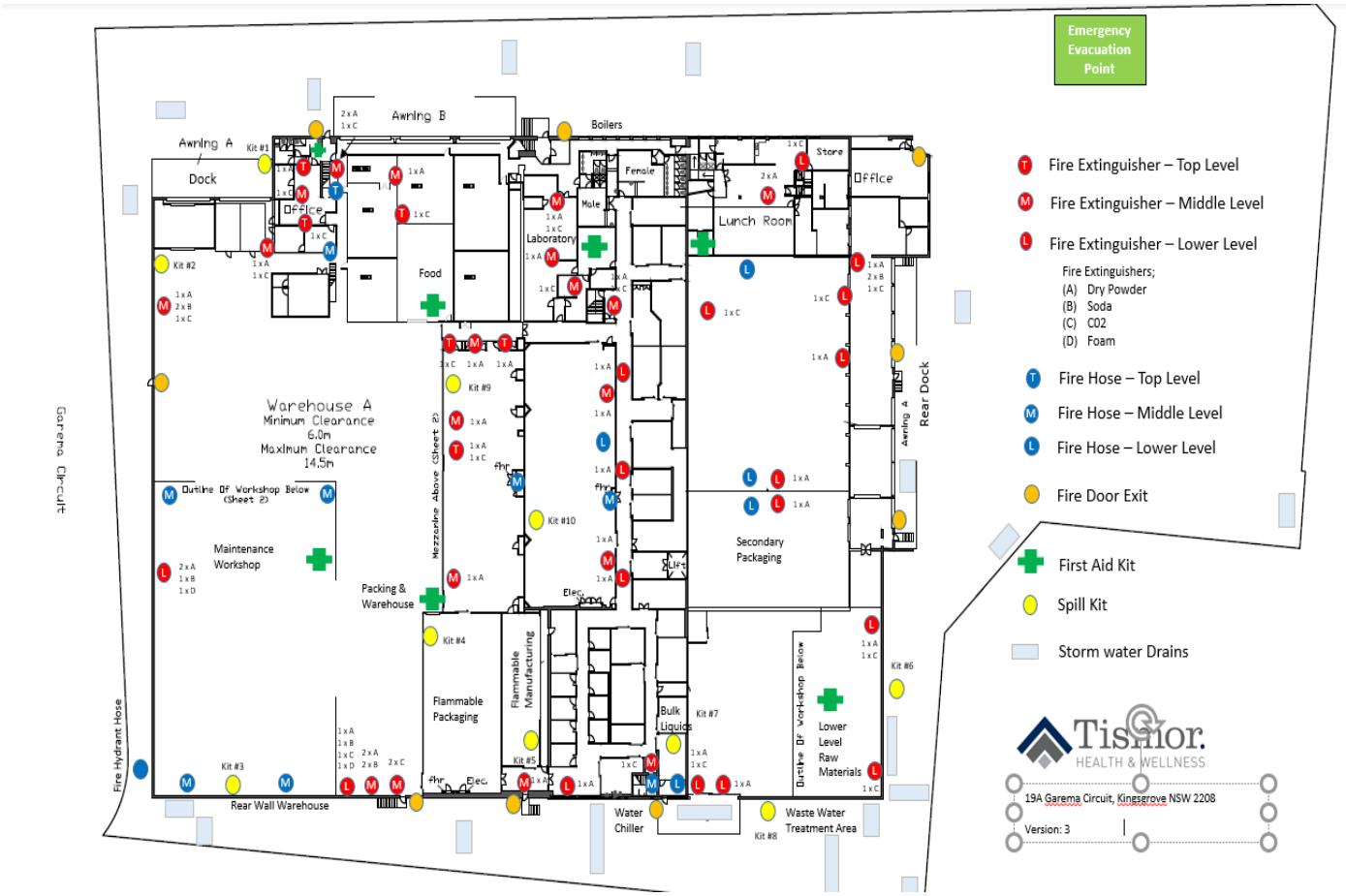
Doc Section No.	Section Title / Subtitle	Changes Made * (See below)	Changes Made / Reason for Changes	Date	Author of Changes
All	All	N	New document	30/06/12	M. Matienzo
9.4	Potential Offensive Odour	A	Added requirements as set in the EPA Licence	23/12/13	M. Matienzo
9	Table 5 Risk Rating of Site Hazards	A	Added Potential Offensive Odour		
9	Table 7 Description of Safety Equipment	A	Added Potential Failure to Meet Noise Limits		
B.	Testing of Plan	A			

C. D.	Review of Plan Staff Training	A A	Added Testing and Review of Plan and Staff Training		
	Pollution Incident and Control Coordinators: Table 5: Storage Chemicals Potential Failure to Meet Noise Limits Incident Management Procedure for Communicating with the Community	DA A A A	Addition of: *Chemicals may enter water drains after spill*- in the Risk Associated Risks. Addition of Potential Failure to Meet Noise Limits, in accordance to EPA regulations. Addition of: A. Incident Management Procedure for Communicating with the Community B. Notification of Adjacent Companies and Neighbours	22/08/14	J.Corns
all	all	all	All- Review of the entire document Addition of VII section- Definitions	21/02/20	B.Loni

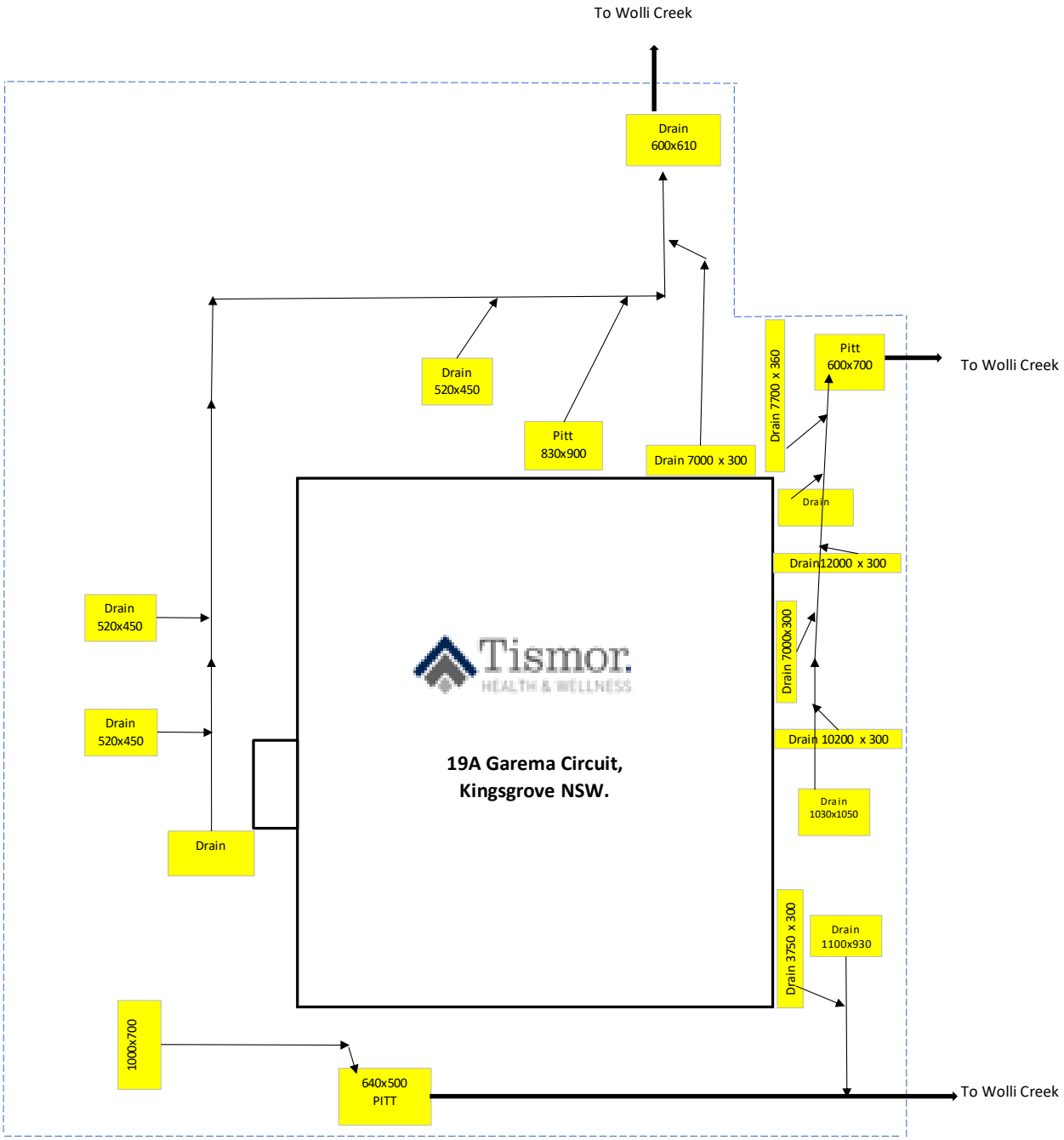
= LEGEND

A = Additional Information D = Deletion of Information R = Rewording O = Other N = New

Appendix 1. Spill kits, drains and Dangerous goods areas



Appendix 2. Tismor Stormwater and Pitt Schematic



GAREMA CIRCUIT

Appendix 3. Satellite photo of site.

Appendix 3. Satellite photo of site and the location of Wolli Creek which is where the storm water ends up.