

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENSEE:

TISMOR HEALTH & WELLNESS PTY. LTD.

PREMISES:

Tismor Health & Wellness

19A Garema Circuit, Kingsgrove NSW 2208

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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

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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:

Ash Kumar- WHS Manager

Ph: 0417 407 723

***Chris Tisdale- CEO**

Working hours- 0404818716

All hours- 1300 165 056

Rami Shnoudeh- Warehouse Manager/Chief Fire-Emergency Coordinator

Ph: 0404818728

Khurram Saleem – Services Engineer

Ph:0431 818 365

Quan Hoang – Production Supervisor/Deputy Fire-Emergency Coordinator

Ph: 0488 083 457

Nick Yammine – Production Supervisor

Ph: 0411 186 914

Peter Zampino – Production Supervisor

Ph: 0404 818 735

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

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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 Work Health, Safety and Environment Manager and 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.

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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, and immediately after any spill or spill drill exercise event.
- 3 storm water shut-off valves are 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.
- Stormwater pit in high risk area of spills discharges into the site tradewaste system
- Trained emergency (spill) response personnel are available on all shifts.
- Mock Drill exercises are held on site to test adequacy of response system

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 CEO 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
- WHSE Manager
- OH&S Committee Chairman and/or Member/s
- 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.

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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 neighbors 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):

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

Packed Store 1 – Raw Material Warehouse Flammable Store (RMW)

Storage Area	Proper Shipping Name	UN No	Class / Division	PG	Type	Max Capacity(kg) (13260)	Typical Quantity (kg)
RMW	Ethanol	1170	3	II	Roofed Flame Proof Room	10000	8000
RMW	Extracts, flavouring, liquid	1197	3	II	Roofed Flame Proof Room	1500	1000
RMW	Isopropanol	1219	3	II	Roofed Flame Proof Room	1000	200
RMW	Hydrochloric Acid Solution	1789	8	II	Raw Material Warehouse	10	2.5
RMW	Sodium Hydroxide Solution, 50%	1824	8	II	Raw Material Warehouse	450	350
RMW	Sodium Hydroxide, Solid 100%	1823	8	II	Raw Material Warehouse	300	200

Packed Store 2 – External Flammable Container

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Storage Area	Proper Shipping Name	UN No	Class / Division	PG	Type	Max Capacity(kg) (11000)	Typical Quantity (kg)
External Flammable Container	Ethanol	1170	3	II	Dangerous Goods Container	10000	8000
External Flammable Container	Isopropanol	1219	3	II	Dangerous Goods Container	1000	200

Packed Store 3 – Finished Goods Warehouse (Transit Store)(FG)

Storage Area	Proper Shipping Name	UN No	Class / Division	PG	Type	Max Capacity(kg) (10000)	Typical Quantity (kg)
FG	Ethanol	1170	3	II	Roofed Warehouse	10000	8000

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

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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: 45,000L

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.

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XI. RISK ASSESSMENT PROCESS

Table 2: Consequences of Risk

Consequence of Risk	Negligible (1)	Minor (2)	Moderate (3)	Major (5)	Catastrophic (6)
People	Report only, no injury	Minor Injury requiring first aid treatment	Medical Treatment, Restricted Work	Major Injury or hospitalisation	Fatality
Environment	No Environmental damage	Minor contained spill (<5L)	Contained spill >5L (no stormwater or soil contamination)	Spill with possible storm water/soil contamination <50L; requires immediate notification to EPA and remediation	Major spill with serious stormwater/ground contamination >50L; requires immediate notification to EPA and remediation
Property & Equipment	No property or equipment damage	Minor, repairable damage	Moderate Damage to property/equipment causing <2 hours downtime in production	Damage or property & equipment requiring major repairs and loss of >1 shift of production time	Loss of production
Financial	no cost or losses	<\$5K	\$5K-\$50K	\$50K-\$200K	>\$200K

Table 3: Likelihood of Risk

Likelihood of Risk		
Descriptor	% Probability (of Risk being realised)	Detailed Description
Almost Certain (5)	>50%	Is expected to occur in most circumstances or has occurred at least on an annual basis within the business previously eg Injury exposure/environmental pollution extremely likely
Likely (4)	26-50%	Has occurred in the last few years within the business or has recently occurred in similar organisations eg Injury exposure/environmental pollution highly likely
Possible (3)	11-25%	Might occur at some time - has previously occurred in the business at some time or has occurred in similar organisation previously under circumstances present
Unlikely (2)	2-10%	Could occur at some time or has never occurred within business but has occurred infrequently in other similar organisations.
Rare (1)	0-1%	May occur only in exceptional circumstances

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Table 4: Risk Analysis Matrix (Level of Risk)

Risk Matrix		Likelihood				
		1 Rare	2 Unlikely	3 Possible	4 Likely	5 Almost Certain
Consequence	5 Catastrophic	5	10	15	20	25
	4 Major	4	8	12	16	20
	3 Moderate	3	6	9	12	15
	2 Minor	2	4	6	8	10
	1 Negligible	1	2	3	4	5

Table 5: Action Required

Risk Level (Likelihood x Consequence)	Risk Acceptance Guide	Action
1 – 4 Low	Acceptable	Monitor and review
5-9 Medium	Generally acceptable	Implement risk controls if reasonably practicable Monitor, review and document controls
10-15 High	Generally, not acceptable	Implement risk controls if reasonably practicable Monitor, review and document controls
16-25 Extreme	Not acceptable	Cease or isolate source of risk Implement further risk controls Monitor, review and document controls

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Table 6: 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	Medium Risk	<ul style="list-style-type: none"> Toxic Effects of Chemicals to Human Health Flammability of Chemicals Chemicals may enter water drains after spill Corrosive Effects of Chemicals 	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Procedures on the receipting and decanting of chemicals are in place. In case of spill, refer to SDS 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. Trained dangerous goods handling and emergency response personnel.
Storage of Solid Waste	Rare	Negligible	Low Risk	<ul style="list-style-type: none"> Disposal of Waste Congested work and storage areas 	<ul style="list-style-type: none"> Failure to collect waste based on agreed frequency with the licensed waste collected 	<ul style="list-style-type: none"> Solid wastes from manufacturing and production are collected daily as per agreement with the licensed waste collector.
	Possible	Minor		Disposal of Waste		

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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 Waste Water and other Liquid Waste			Medium Risk		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. High level alarm with telephone notification by security monitoring company
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	Smoking on site	Smoking area dedicated on site and is away from storage of chemicals.

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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
				Deliberate ignition – vandalism	Staff or intruders could target organization	<p>Regular housekeeping inspections on site.</p> <p>Police security check before commencing employment.</p> <p>Entrance to the front gate and all entrances require a swipe card which is only issued to permanent Tismor staff.</p> <p>Onsite security access and video surveillance</p>
Chemical/fuel spill	Unlikely	Minor	Low risk	<ul style="list-style-type: none"> Toxic Effects of Chemicals to Human Health Flammability of Chemicals Chemicals may enter water drains after spill. Corrosive Effects of Chemicals Contamination of stormwater 	<p>Inappropriate handling or human error.</p> <p>Vandalism</p>	<p>Limited quantities kept on site and reported to SafeWork NSW (Notification).</p> <p>Authorised staff are trained to follow correct chemical and fuel handling procedures.</p> <p>Flammable store can only be accessed by authorized personnel.</p> <p>Police security check before commencing employment.</p>

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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
						<p>Entrances to the front gate and all entrances require a swipe card which is only issued to permanent staff. Emergency response equipment, procedures and personnel in place</p> <p>Onsite security access and video surveillance</p> <p>Gate Valves in place to prevent any discharge to environment in case of emergency in area next to Raw Material Warehouse & Tradewaste Plant</p>

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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 7: 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
Selenium Sulphide	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

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

Table 8: Description of Safety Equipment

Identified Hazard	Description of Safety Equipment
Storage of Chemicals	<p>All dangerous goods are stored in the designated depots as illustrated on Dangerous Goods Depot Plan (Drawing 1).</p> <p>Chemicals are received and/or decanted based on the current procedures in place.</p> <p>In case of chemical leak, the spill response team have access to respirators, have been trained to use them. Spill kits are also located throughout site.</p>
Storage of Solid Waste	<p>Solid wastes are stored in skip bins provided by the licensed waste collector and are collected as per prescribed frequency.</p>
Storage of Wastewater and other Liquid Waste	<p>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.</p> <p>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.</p> <p>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.</p> <p>High level alarms are in place to monitor tradewaste tank levels.</p> <p>The Tradewaste system plant schematic, demonstrating the operation and capacities is attached as Appendix 4.</p>

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Identified Hazard	Description of Safety Equipment
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. These pits are fitted with gate valves that can be closed in case of a possible emergency to prevent pollution.
- 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

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- 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.

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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, WorkRecover 177 Elizabeth Dr, Liverpool	(02) 9600 7778
Insurance Broker Company	Westlawn Insurance Brokers P/L Jolyne Marks	02 6618 2406 / 0409 531 213
SDS Record Keeping	Chemwatch	1800 039 008
Environmental Protection Authority (EPA)	N/A	131 555
Security Firm	Highland Security	1300 445 263
CEO	Chris Tisdale	02 9503 0000/ 0404 818 716
WHSE Manager	Ash Kumar	0417 703 723
SafeWork	Note: If SafeWork are required, WHSE Manager, Director HR 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 CEO (relevant on duty authority) or Delegate.

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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 CEO (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 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
- SafeWork 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.

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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 tested	Tested by	Details of Test	Next test
13/01/2021	WHSE Representative and POLLUTION INCIDENT & CONTROL SPILL RESPONSE TEAM	Site Tradewaste Holding tank overflow, spill response	Before end of April 2021

Other Spill Response tests conducted:

- 10th February 2021 (Response Team training and testing)
- 3rd February 2020 (Response Team training and testing)
- 29th January 2021 (Response Team training and testing)
- 19th September 2019 – Spill Response Test

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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 is 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.

In case of failure of wastewater plant, the discharge water is retained on site in containers available at the tradewaste plant for this purpose only. (The stormwater pit is permanently closed so that all discharges are contained on site). The tradewaste tank is also fitted with a high-level alarm which triggers a phone notification for appropriate response.

a) Spill

The most likely pollution incident to occur on site is Chemical Spill whether it may be Raw Material, Bulk product or wastewater. 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:

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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 has installed 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.

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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 6: 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 7: 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 8: 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 8: Complete Incident Form

As soon as possible after the spill, an incident reports should be completed and entered onto the Reporting System.

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DOCUMENT CHANGE CONTROL PAGE

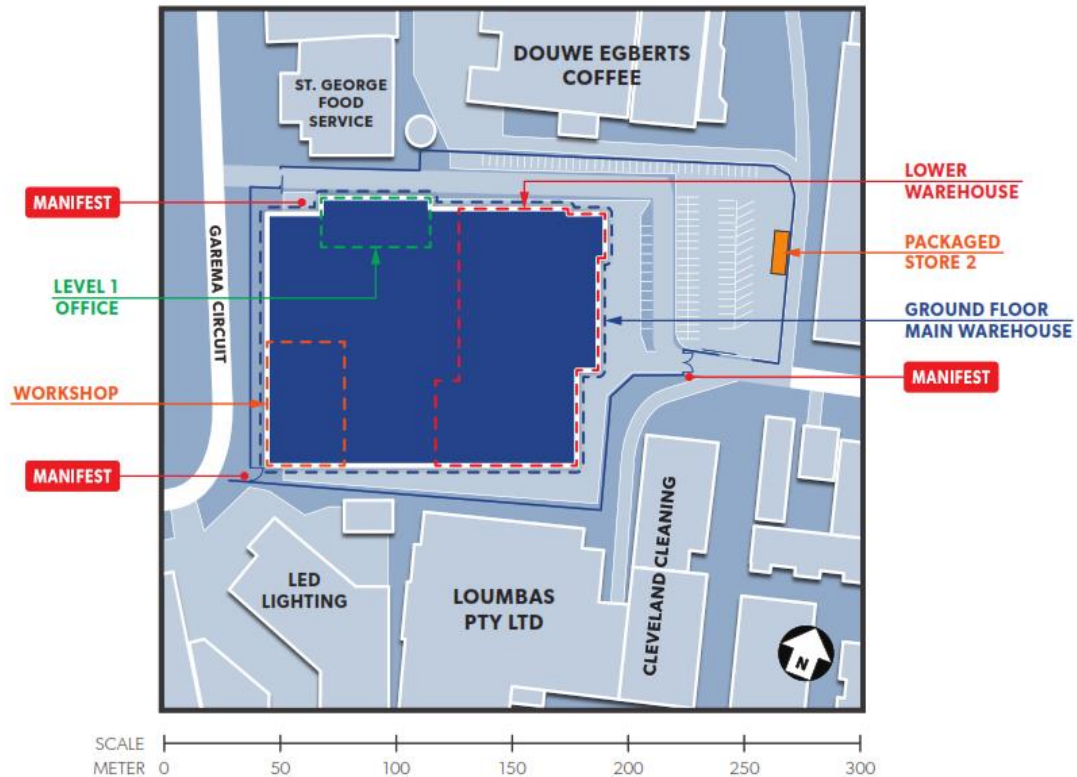
Doc Section No.	Section Title / Subtitle	Changes Made * (See below)	Changes Made / Reason for Changes	Date	Author of Changes
All	All	N	New document	30/06/12	M. Matienzo
9.4	Potential Offensive Odour	A	Added requirements as set in the EPA Licence	23/12/13	M. Matienzo
9	Table 5 Risk Rating of Site Hazards	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	Added Testing and Review of Plan and Staff Training		
C.	Review of Plan	A			
D.	Staff Training	A			
	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: <i>Chemicals may enter water drains after spill-</i> 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	
all	all	all	All- Review of the entire document Addition of VII section- Definitions	21/02/20	B.Loni
all	all	all	All- Review of the entire document Addition of VII section- Definitions	15/03/21	Ash Kumar
= LEGEND					
A = Additional Information D = Deletion of Information R = Rewording O = Other N = New					

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Appendix 1. Spill kits, drains and Dangerous goods areas

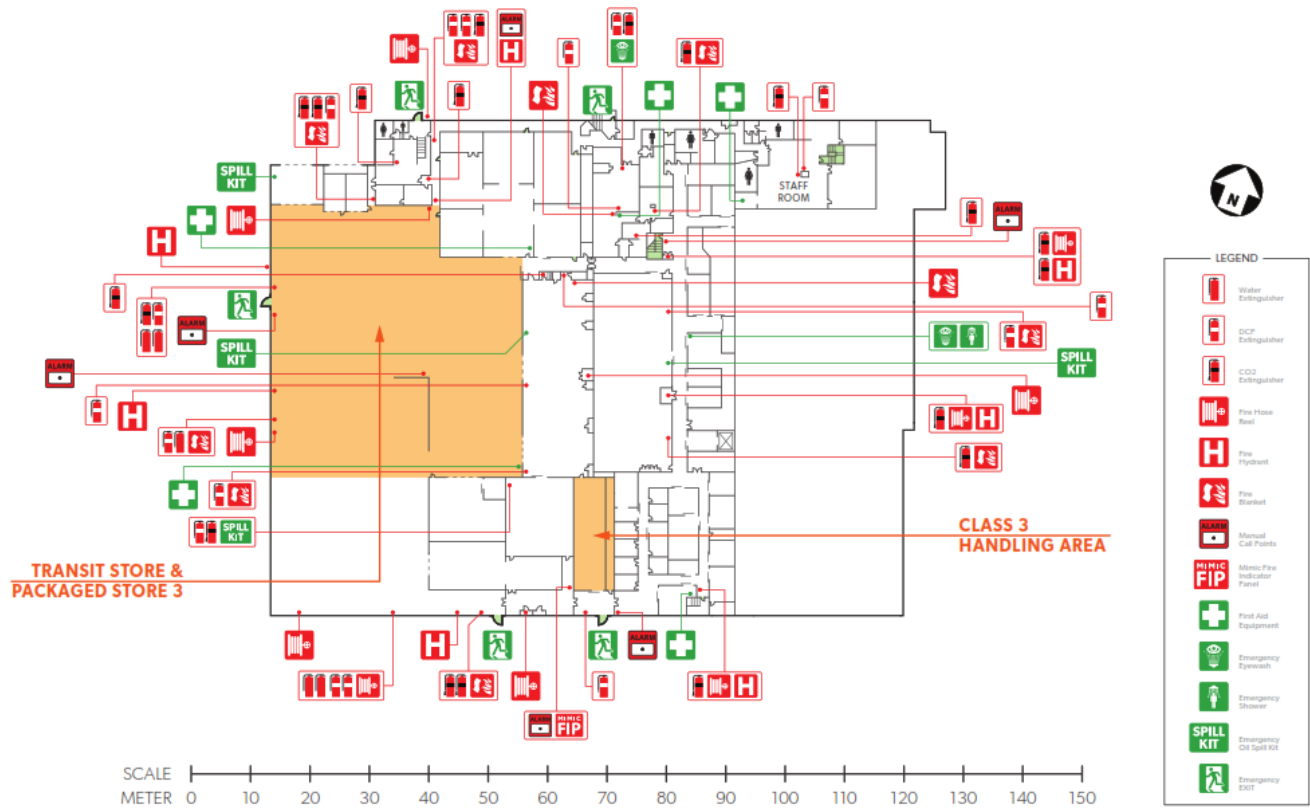
SITE PLAN

Tismor Health and Wellness
19A Garema Circuit, Kingsgrove NSW 2208



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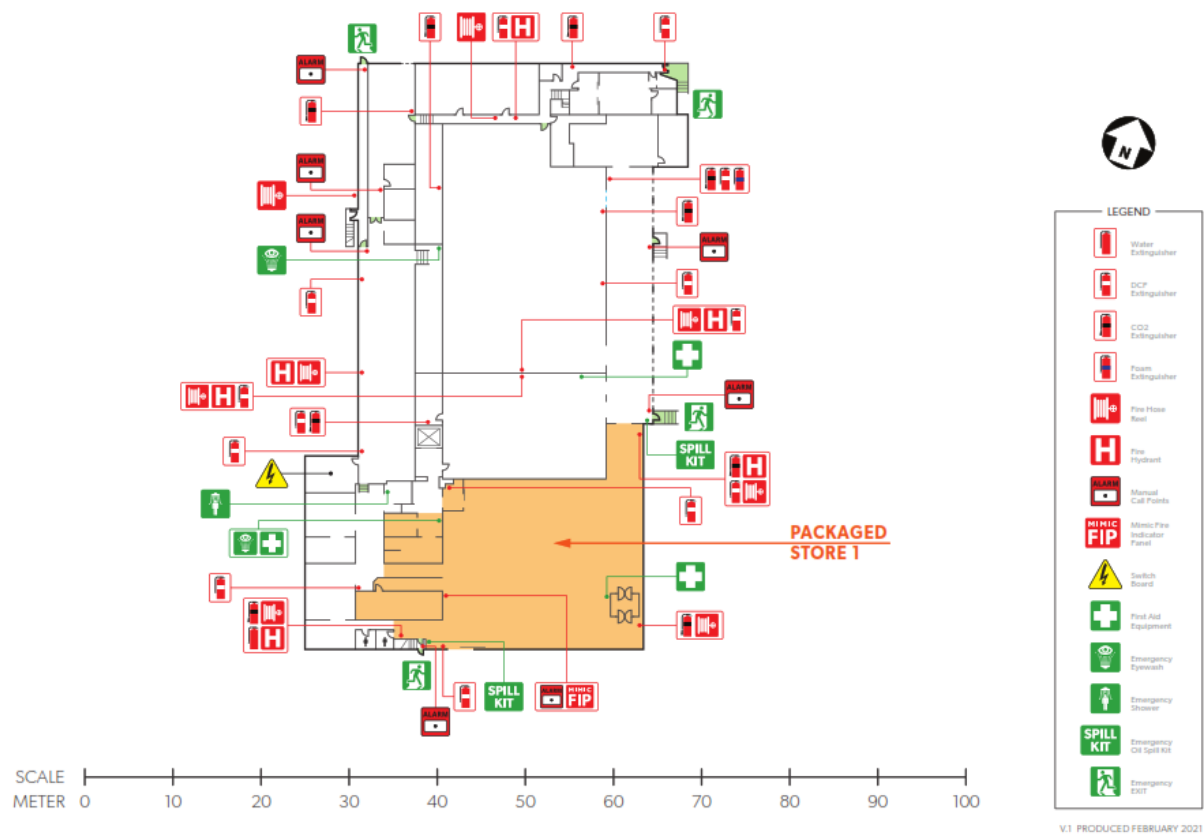
GROUND FLOOR MAIN WAREHOUSE



V1 PRODUCED FEBRUARY 2021

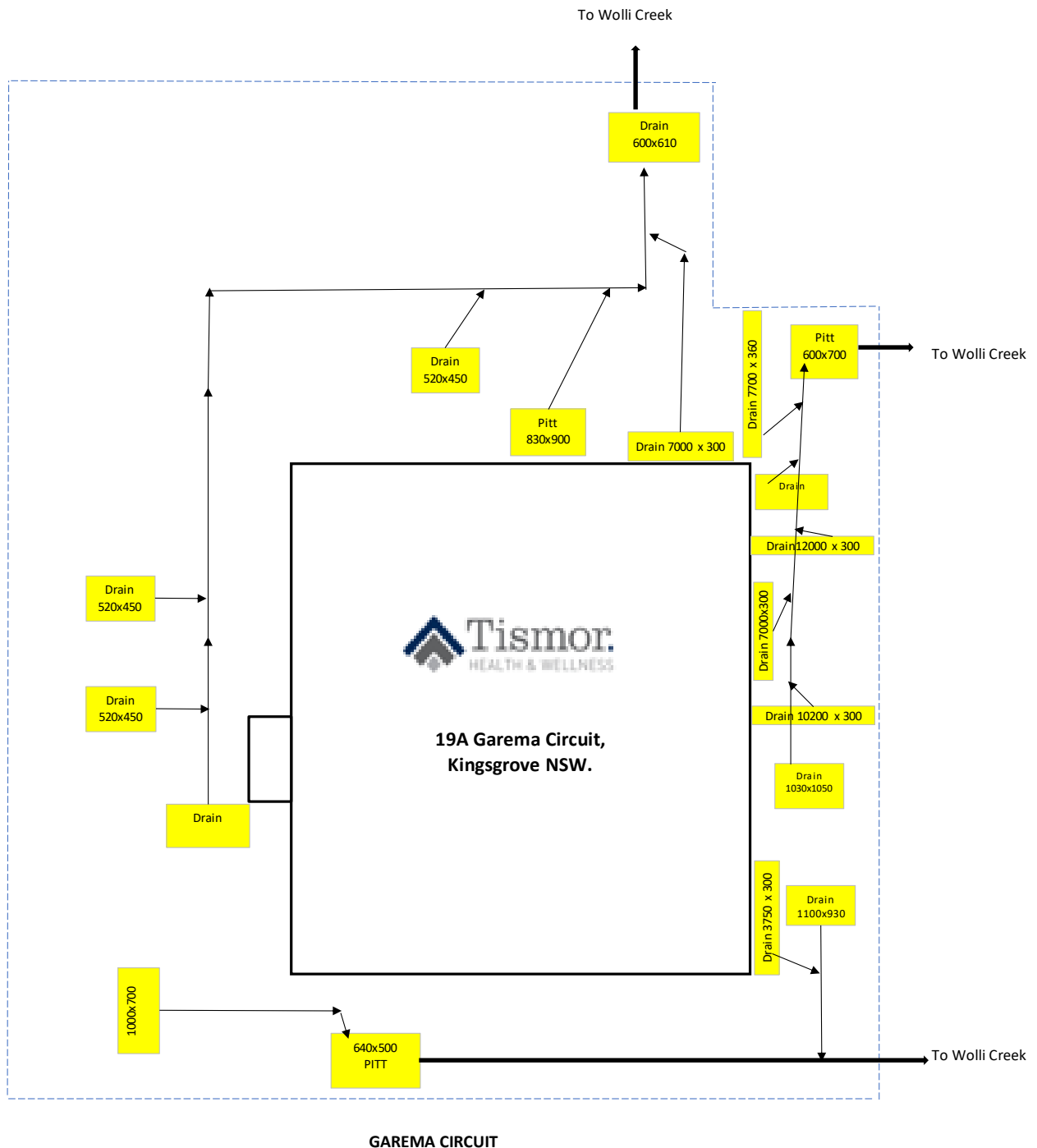
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LOWER WAREHOUSE



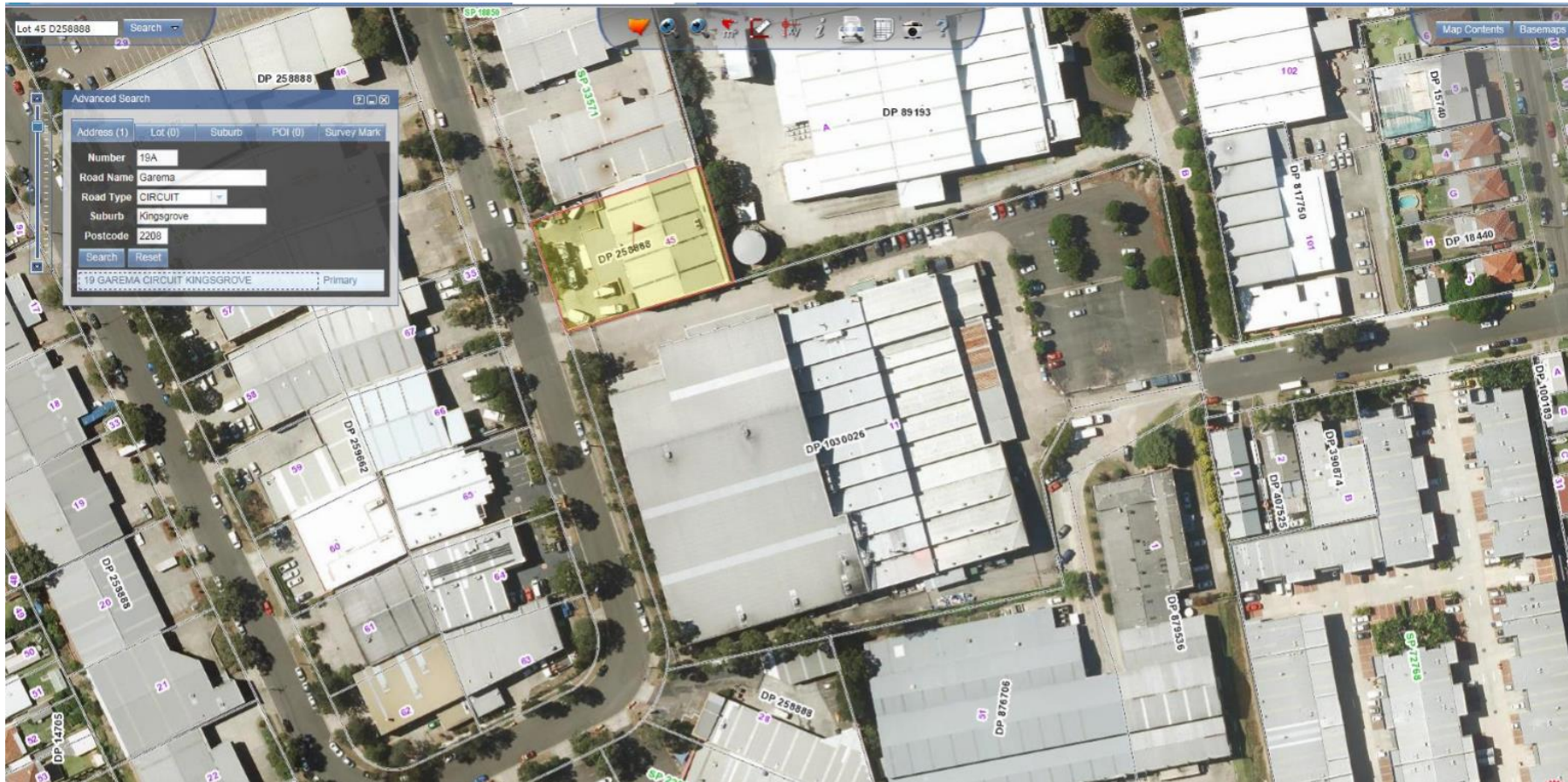
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Appendix 2. Tismor Stormwater and Pitt Schematic



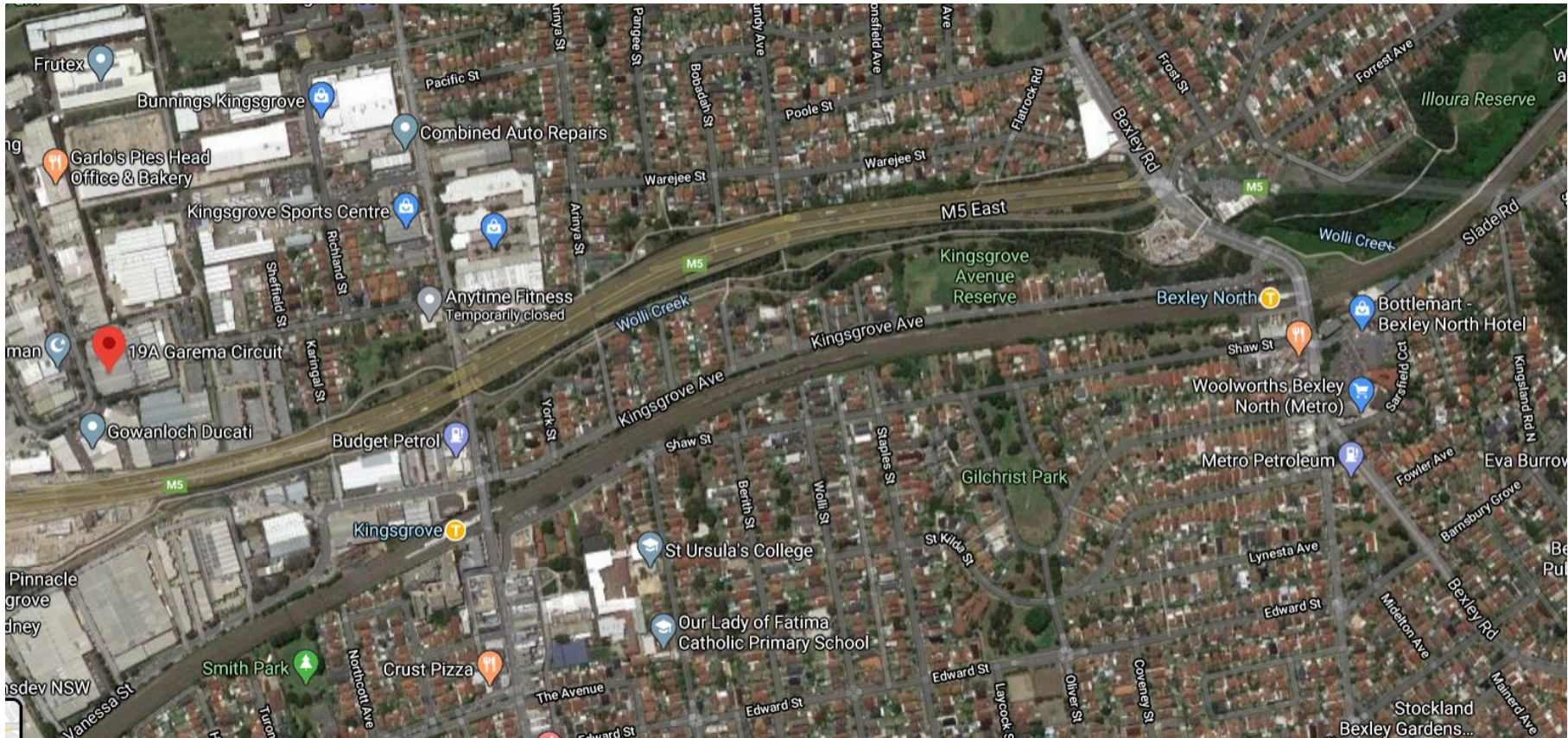
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Appendix 3. Satellite photo of site.



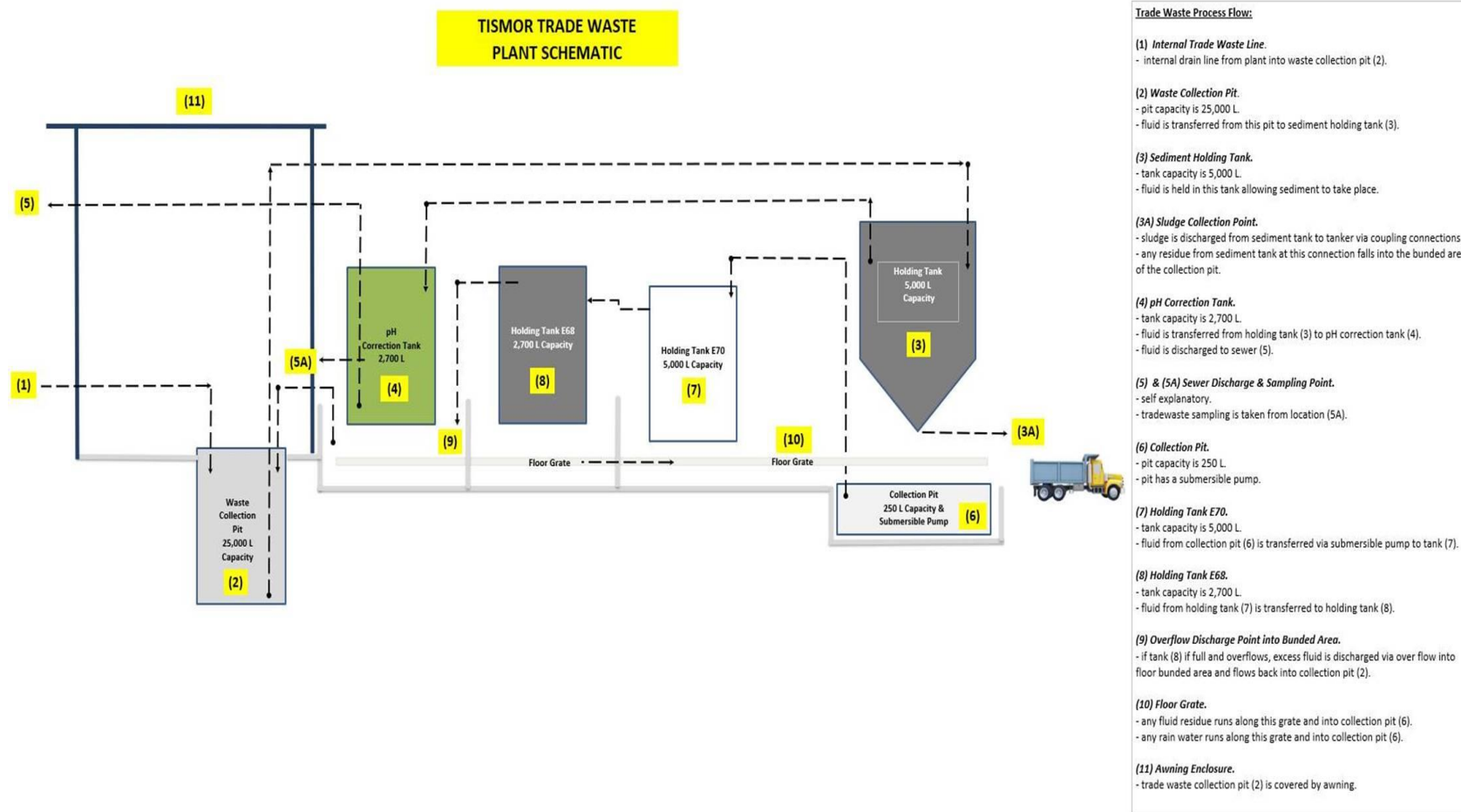
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Appendix 3. Satellite photo of site and the location of Wolli Creek which is where the storm water ends up.



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Appendix 4. Tismor Trade Waste Plant Schematic



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