# 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 introduced changes to improve the way pollution incidents are reported and managed. These changes apply to the holders of environment protection licences under the Protection of the Environment Operations Act 1997 (POEO Act).

General obligations of the licensees are set out in the POEO Act and the Regulations made under the Act, include the following:

- Ensure persons associated with you comply with the licence.
- Control the pollution of waters and air.
- Report incidents causing or threatening material environmental harm to the environment.

Licensees under the POEO Act, requires anyone carrying on an activity or occupying a premises who becomes aware of the pollution incident are required to report pollution incidents immediately.

## 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 1 Tismor Health and Wellness Emergency Procedure Manual
SOP HSE 8 Tismor Disaster Recovery Procedure
SOP HSE 4 Safety Hazards and Near Miss
SOP HSE 5 Emergency Spill Control
SOP QA 2 QIDR
Dangerous and Hazardous Goods Manifest Register Jan 2024

## V. FACILITY INFORMATION

### Tismor Health & Wellness Pty. Ltd.

| | |
|---|---|
| **LICENSE NUMBER** | 6689 |
| **LICENSEE** | TISMOR HEALTH & WELLNESS PTY LIMITED |
| **LICENSE TYPE** | PREMISES |
| **PREMISES** | 19A GAREMA CIRCUIT KINGSGROVE<br>NSW 2208<br>LOT 11 DP 1030026 |
| **SCHEDULED ACTIVITY** | CHEMICAL PRODUCTION<br>CHEMICAL STORAGE |
| **FEE BASED ACTIVITY** | CHEMICAL PRODUCTION WASTE GENERATION<br>CHEMICAL STORAGE WASTE GENERATION |
| **REGION** | NSW EPA<br>6 Parramatta Square<br>10 Darcy St<br>PARRAMATTA NSW 2150<br><br>LOCKED BAG 5022<br>PARRAMATTA NSW 2124 |

| **Pollution Incident and Control Personnel:** | | |
|---|---|---|
| George Johnstone | CEO* | 0408 214 888 |
| Anthony Kiely | Engineering Manager* | 0403 528 357 |
| Khurram Saleem | Facilities Engineer | 0431 818 365 |
| Rami Shnoudeh | Warehouse Manager / Chief Warden | 0404 818 728 |
| Quan Hoang | Day Shift Production Supervisor / Deputy Warden | 0488 083 457 |
| Jacky Huang | Afternoon Shift Supervisor / Warden | 0452 526199 |
| Connie Elfes | WHSE Coordinator* | 0461 550 827 |
| *Only designated personnel have delegated authority to contact, notify and report to the relevant regulators. | | |

## 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 mitigate the potential of a pollution incident occurring and as required by EPA regulation, the Pollution Incident Response Management Plan (PIRMP) shall be reviewed, annually and or when required, when there are changes to the business or regulatory requirements. The review will be in consultation with key stakeholders of the business including but not limited to the executive management, operations, engineering and health and safety delegate.

The review will also include conducting a drill at least annually to test the plan to ensure that it is efficient in its implementation and meets the EPA requirements.

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

- 120L and 240L spill kits located throughout the site. Inspected by the supplier every 3 months and called out immediately after a spill event to restock.
- Access to weighted drain cover stored within proximity of stormwater pit that are in areas at risk of potential spill.
- 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.
- Trained spill response team members are available on each shift.
- Drill exercises are conducted on site to test the spill response management plan.

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

A site pollution incident and control spill response team has been established to perform and coordinate the management of a spill incident.

The pollution incident and control spill response team consist of but not limited to personnel from each work area, shift and emergency wardens. The response team is supported by the site emergency team, operations and executive delegate.

## 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 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

A 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**

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

| Storage Area | Proper Shipping Name | UN No | Class / Division | PG | Type | Max Capacity(kg) (16020) | 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 | 1000 |
| 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, Solid100% | 1823 | 8 | II | Raw Material Warehouse | 300 | 200 |
| RMW | Terpene Hydrocarbons N.O.S. | 2319 | 3 | III | Roofed Flame Proof Room | 2500 | 2500 |
| RMW | Camphor | 2717 | 4.1 | III | Raw Materials Warehouse | 150 | 150 |
| RMW | Sodium Fluoride | 1690 | 6.1 | III | Raw Materials Warehouse | 100 | 100 |
| RMW | Toxic Solid Organic N.O.S. | 2811 | 6.1 | III | Raw Materials Warehouse | 10 | 10 |

## Packed Store 2 – External Flammable Storage Container

| Storage Area | Proper Shipping Name | UN No | Class / Division | PG | Type | Max Capacity(kg) (13400) | 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 |
| External Flammable Container | Flammable Liquid N.O.S. | 1993 | 3 | III | Dangerous Goods Container | 1800 | 1800 |
| External Flammable Container | Terpene Hydrocarbons | 2319 | 3 | III | Dangerous Goods Container | 400 | 400 |
| External Flammable Container | Environmentally Hazardous Substance Liquid N.O.S. | 3082 | 3 | III | Dangerous Goods Container | 200 | 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

The Wastewater Plant is protected by bunding to contain potential 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 abovementioned 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 defence 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

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 above. 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

**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<br>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 |

**Table 4: Risk Analysis Matrix (Level of Risk)**

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

**Table 5: Action Required**

| Risk Level<br>(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<br>Monitor, review and document controls |
| 10-15 High | Generally, not acceptable | Implement risk controls if reasonably practicable<br>Monitor, review and document controls |
| 16-25 Extreme | Not acceptable | Cease or isolate source of risk Implement further risk controls<br>Monitor, review and document controls |

**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 | • Toxic Effects of Chemicals to Human Health<br>• Flammability of Chemicals<br>• Chemicals may enter water drains after spill<br>• Corrosive Effects of Chemicals | • Chemical spill during receipt or transfer of chemicals<br>• Flammable chemicals not stored in the designated flammable location<br>• Corrosive chemicals not stored in the designated corrosive location | • Procedures when receiving and decanting of chemicals are in place. In case of spill, refer to SDS for the appropriate handling and implement spill response plan.<br>• Dangerous goods are kept at the designated location. Incoming Goods Receiver checks delivery invoice and identifies the location the goods will be stored.<br>• Trained dangerous goods handling and emergency response personnel. |
| Storage of Solid Waste | Rare | Negligible | Low Risk | • Disposal of Waste<br>• 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 Wastewater and other Liquid Waste | Unlikely | Moderate | Medium Risk | • Disposal of Waste<br>• Congested work and storage areas | • 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.<br>• 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 limits and restriction as set out in EPA Licence | • Worn out rotary valves of Powders Plant<br>• Blow down of Compressor | • Preventive Maintenance of Rotary Valves<br>• Reporting System where Operators are to call attention of Fitters for unusual noise in the powders plant.<br>• Blow down is done between 0700H to 2200H and is less than 15 minutes to complete. |

| 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 |
|---|---|---|---|---|---|---|
| Fire Ignition | Unlikely | Minor | Low Risk | • Accidental ignition by human intervention<br>• Deliberate ignition – vandalism | • Smoking on site<br>• Staff or intruders could target organization | • Dedicated smoking area on site away from storage of chemicals.<br>• Regular housekeeping inspections.<br>• Security system – swipe access and 24hr CCTV surveillance<br>• Main security gate and entrances require swipe access issued to permanent staff. |
| Chemical / fuel spill | Unlikely | Minor | Low risk | • Toxic Effects of Chemicals to Human Health<br>• Flammability of Chemicals<br>• Corrosive Effects of Chemicals<br>• Contamination of<br>• stormwater | • Inappropriate handing or human error | • Limited quantities kept on site as per SafeWork NSW requirements.<br>• Staff are trained to follow correct chemical and fuel handing procedures.<br>• Flammable store only accessed by authorized personnel.<br>• Implement spill response plan and deploy drain mats to cover stormwater pits<br>• Spill kits and equipment accessible and located throughout the site<br>• Onsite security access and CCTV 24hr surveillance<br>• Gate Valves in place to prevent any discharge to environment in case of emergency in area next to Raw Material Warehouse & Trade waste Plant. |

## XII. Inventory of Potential Pollutants on Site

Below table of inventory of potential pollutants on site and the maximum quantity stored on site. The site maintains a Dangerous Goods Manifest, reviewed annually.

### Table 7: Inventory of Potential Pollutants

| 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 |

## 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 | All dangerous goods are stored in the designated location as illustrated in Appendix 1<br><br>Chemicals are received and/or decanted based on the current procedures in place.<br><br>Spill kits are also located throughout site. |
| Storage of Solid Waste | Solid wastes are stored in skip bins provided by the licensed waste collector. |
| Storage of Wastewater 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.<br><br>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.<br><br>Sludge and other liquid wastes like rejected bulk are collected by licensed sludge collectors. These wastes are collected upon the site's request.<br><br>High level alarms are in place to monitor trade waste tank levels.<br><br>The Trade waste system plant schematic, demonstrating the operation and capacities is attached as Appendix 4. |
| Potential Offensive Odour | Sludge and other liquid wastes like rejected bulk 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 located throughout the site, 120 - 240L hazardous chemical spill kits. These are inspected by the supplier every 3 months and call out service following a spill event.
- 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.
- Drain mats located within proximity of storm water pits to be applied as soon as a spill event occurs.
- Additionally, various personal protective equipment is available in the spill kits on site at all times including gloves, 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
- 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 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 emergency wardens will assist to manage and coordinate the emergency evacuation plan by activating the evacuation alarm manually. When the evacuation alarm is sounded, the site's Emergency Management Plan is activated and implemented and controlled by the Chief Warden / Deputy Warden in coordination and as directed by emergency services.

## XIII. External Contact Phone Number Listing:

| SERVICE | NAME | EMERGENCY CONTACT NO. |
|---|---|---|
| Emergency Services | Fire Brigade / Ambulance / Police | 000 |
| State Emergency Services | NSW SES – Metro Zone | 132 500 |
| Utilities - Electricity | Origin | 131 388 |
| Utilities - Water | Sydney Water | 132 090 |
| Utilities - Gas | Origin | 131 109 |
| State Environmental Regulator | NSW Environmental Protection Authority (EPA) | 131 555 |
| Local council | Canterbury Bankstown Council | Phone: (02) 9789 9300 BH |
| State Safety Regulator | SafeWork NSW | 13 10 50 |
| Security Service Provider | Highland Security | 1300 445 263 |
| *Only designated personnel have delegated authority to contact, notify and report to the relevant authorities. | | |
| CEO* | George Johnstone | 0408 214 888 |
| Facilities Engineer | Khurram Saleem | 0431 818 365 |
| Engineering Manager* | Anthony Kiely | 0403 528 357 |
| WHSE Coordinator* | Connie Elfes | 0461 550 827 |

## XIV. 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 and 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 the CEO or authorised personnel.

**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 their supervisor, contact the CEO and follow emergency procedures. Follow instructions as directed by emergency services. Notify relevant regulatory authorities of the incident as soon as it is reasonably practicable to do so.

In the event of a “material harm incident” the following authorities are to be contacted as per Section XIV. External Contact Phone Number Listing:

- EPA
- Canterbury-Bankstown Council
- Sydney Water
- SafeWork NSW

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 shall be kept of all steps involved in dealing with each incident and kept on site in case additional information is required. Following the initial notification, the delegated personnel will be responsible for coordinating and maintaining contact with the relevant authority.

Where the material harm incident does not pose any threat to human health or property, concurrently with contacting emergency services, all possible actions should be taken to control the pollution incident and minimise 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 as per site spill response plan.

## C. Notification of Adjacent Companies and Neighbours

In the event of a determined material harm incident, community notification will be coordinated and undertaken by the delegated personnel.

When contacting adjacent companies and neighbours the notification process is as follows:

- **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

## D. Testing of the Plan

The PIRMP will be tested annually during the life of the EPA license. Testing will be conducted as a desktop simulation and/or practical exercise drill undertaken on site. Exercises and drills will be documented, and records maintained on site.

| Date Tested | Tested by | Details of Test | Next Due |
|---|---|---|---|
| 13/01/2021 | WHSE Representative<br>Pollution Incident & Control<br>Spill Response Team | Site Trade waste Holding tank overflow, spill response | Before end of April 2021 |
| 13/05/2022 | WHSE Representative<br>Pollution Incident & Control<br>Spill Response Team | Site Trade waste holding tank overflow, spill response | Before end of May 2023 |
| 01/05/2023 | WHSE Representative<br>Pollution Incident & Control<br>Spill Response Team | Site Trade waste holding tank overflow, spill response | Before end of May 2024 |

### E. Review of PIRMP

The PIRMP will be reviewed every 3 years and or when there are regulatory or legislative changes and or as required. Records of PIRMP revisions will be documented as per quality requirements.

### F. Staff Training

The objective of staff training is as follow:

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

b. **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.

| Date | Details | Attendees | Frequency |
|---|---|---|---|
| 26/02/2024<br>27/02/2024 | Spill Response training | Spill Response team<br>Shift supervisors / production manager | Annual |
| 10/02/2021 | Response Team training and testing | Spill Response team | Annual |
| 29/01/2021 | Response Team training and testing | Spill Response team | Annual |
| 03/02/2020 | Response Team training and testing | Spill Response team | Annual |
| 19/09/2019 | Spill Response Test | Spill Response team | Annual |

## XV. 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 wastewater plant is located inside a bunded area which will contain the volume of the wastewater 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 trade waste plant for this purpose only. (The stormwater pit is permanently closed so that all discharges are contained on site). The trade waste 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 a spill whether it may be raw material, bulk product or wastewater. As soon as a spill event has occurred, the extent and the risk are immediately assessed, and the spill response plan is immediately implemented.

**PROCEDURE**

**Step 1: Communicate the incident for assistance and secure the area.**
Immediately let a co-worker or persons working in the vicinity know of the spill so that they can notify the supervisor to alert the Spill Response Team for assistance.

**Step 2: Assess the Risk and Stop the source if possible.**
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.**

Apply drain mats over the storm water pits to prevent spillage into the drain.
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. The Spill Response Team will be continuing to assess the extent of the incident with regards to potential to cause material harm.

Review the SDS, to determine the most appropriate PPE to wear and course of action required to manage the spill and where required first aid measures. 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 pads and booms and drain mats to protect to storm water drains.

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, designated personnel must be informed immediately, and relevant authorities notified.

**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, reassess the incident and clean-up spill and dispose appropriately. Use the absorbent materials to clean up the spill. Additional materials such as neutralisers, detergents etc may be needed to completely clean the area. The absorbed material is then cleaned up and disposed of appropriately. Where required, the waste management service provider – Veolia may need to be contacted to provide additional services to ensure waste is collected and disposed of appropriately.

**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.

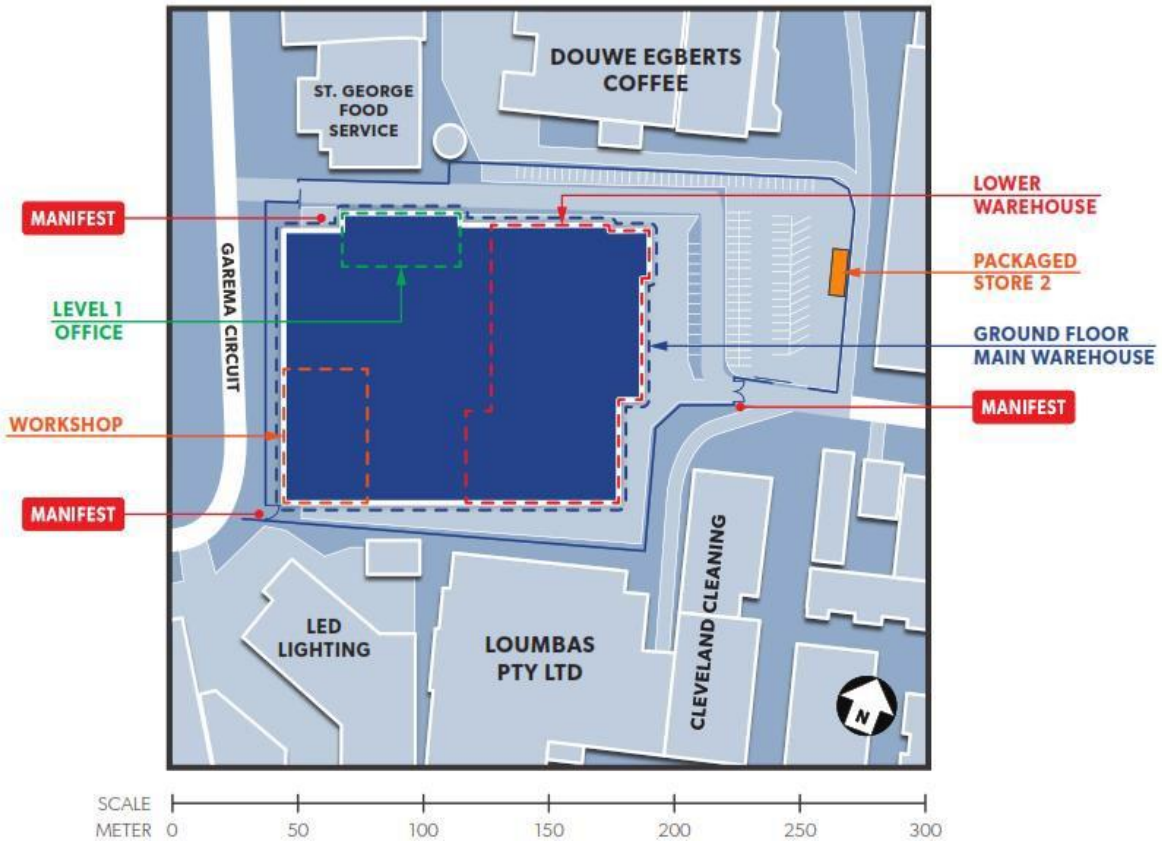
**Step 9: Complete Incident Form.**

As soon as reasonably practicable, following the spill, complete an incident report and entered into the incident management database system.

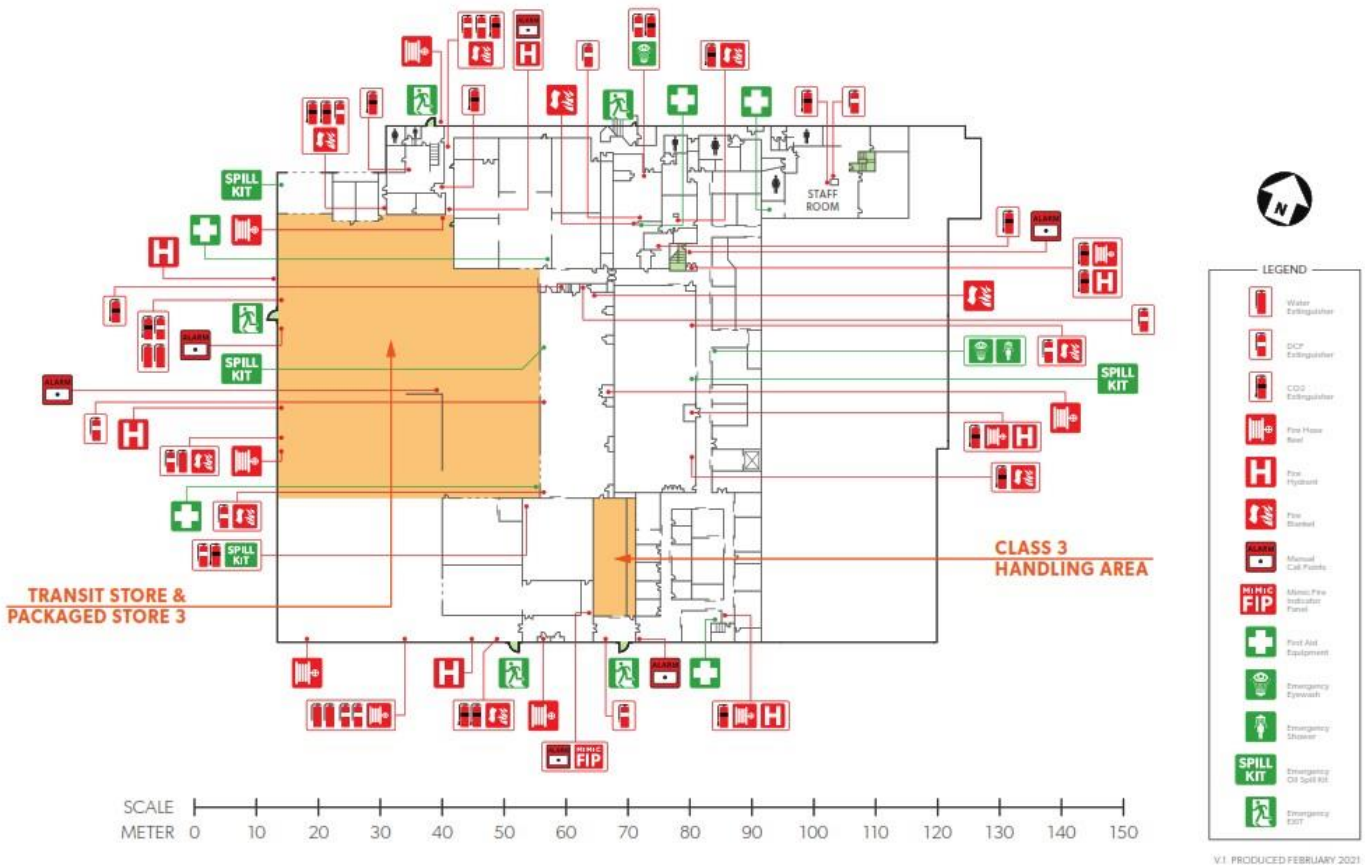
**Appendix 1. Spill kits, drains and Dangerous goods areas.**

# SITE PLAN

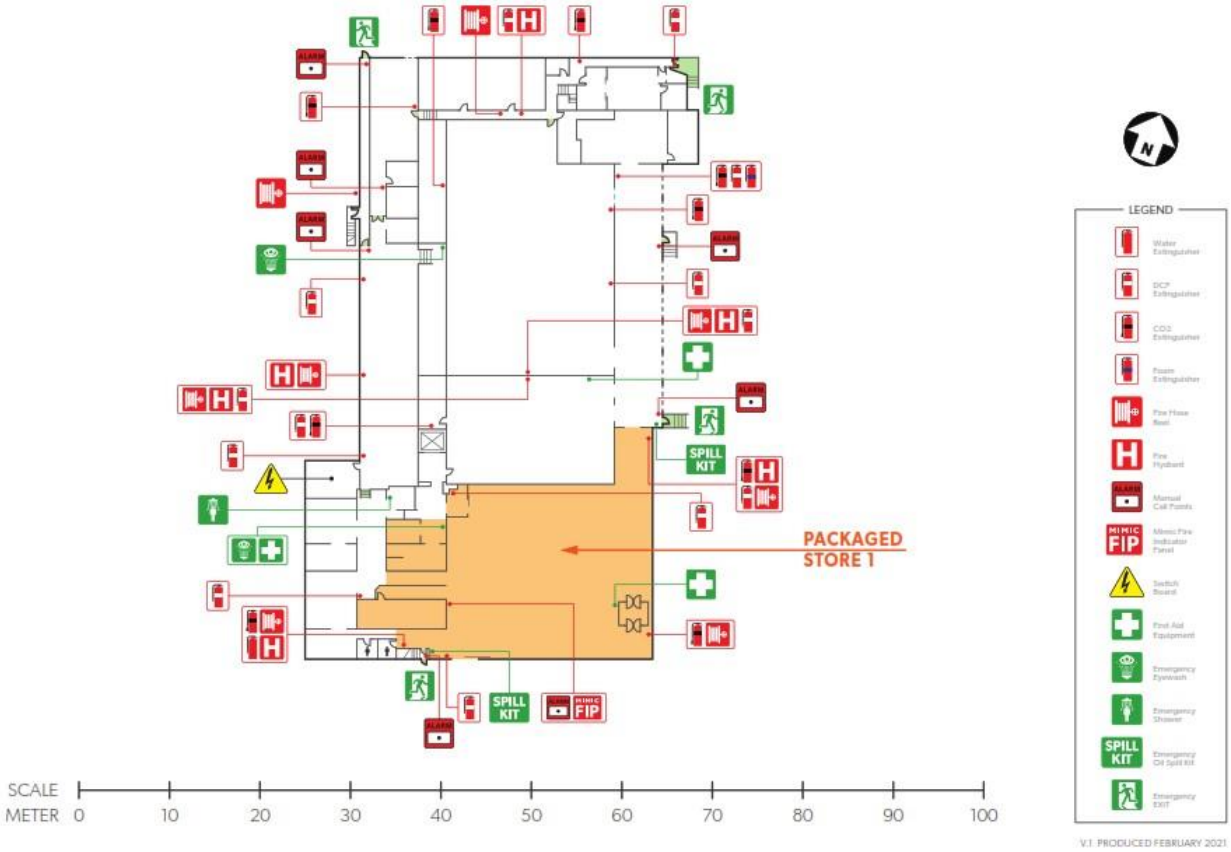
**Tismor Health and Wellness**
19A Garema Circuit, Kingsgrove NSW 2208



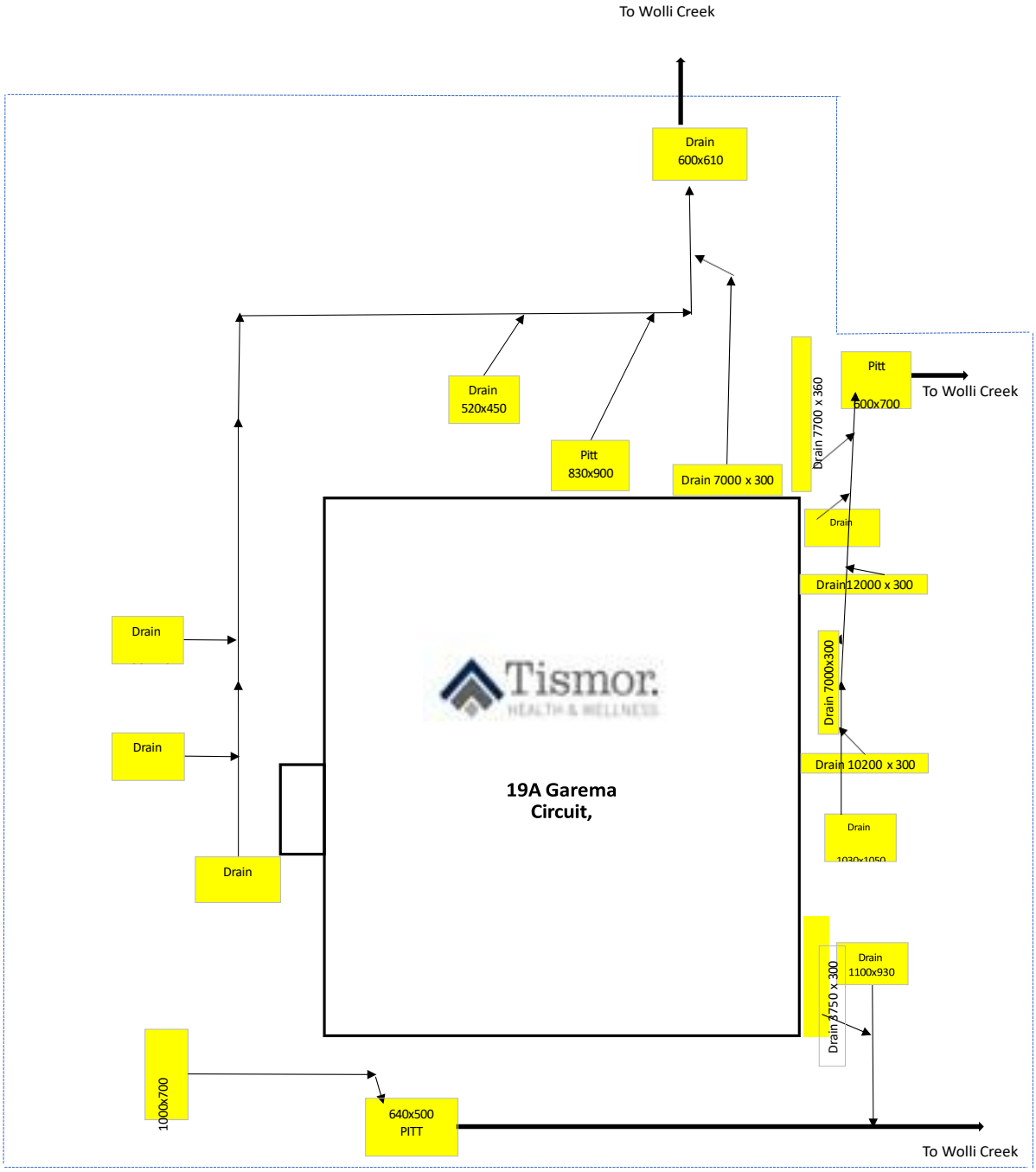
# GROUND FLOOR MAIN WAREHOUSE



# LOWER WAREHOUSE

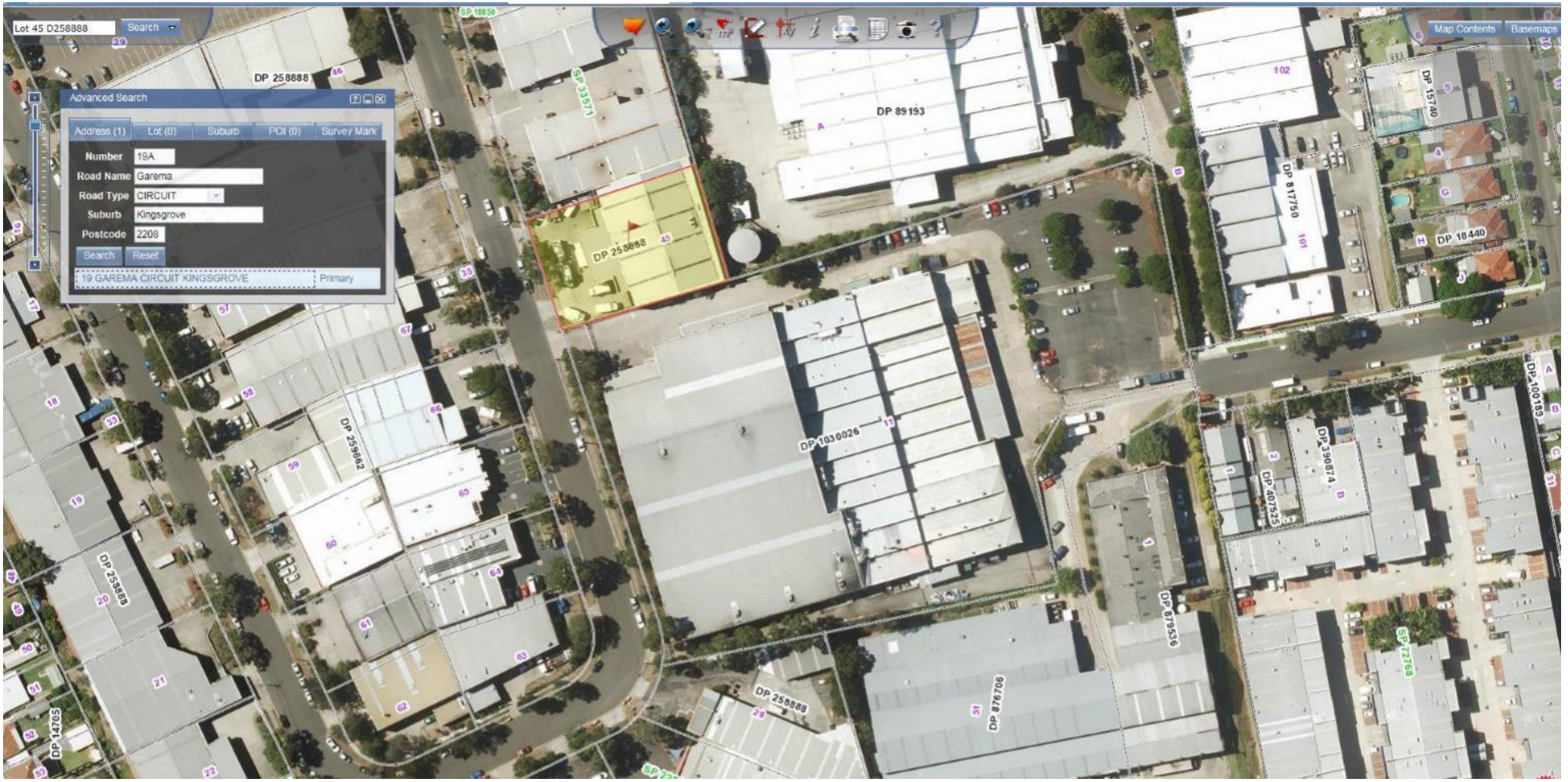


## Appendix 2. Tismor Stormwater and Pitt Schematic

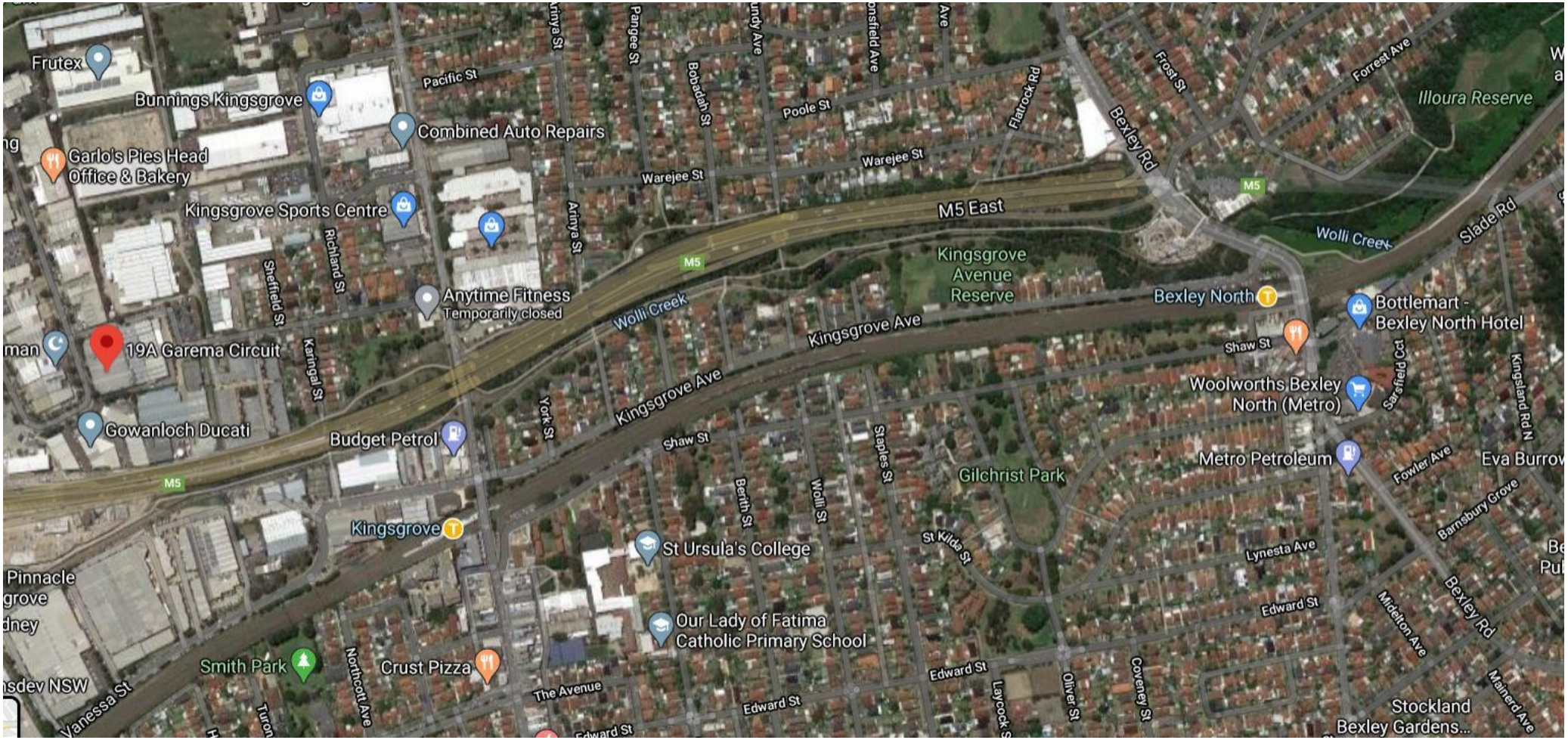



**GAREMA CIRCUIT**

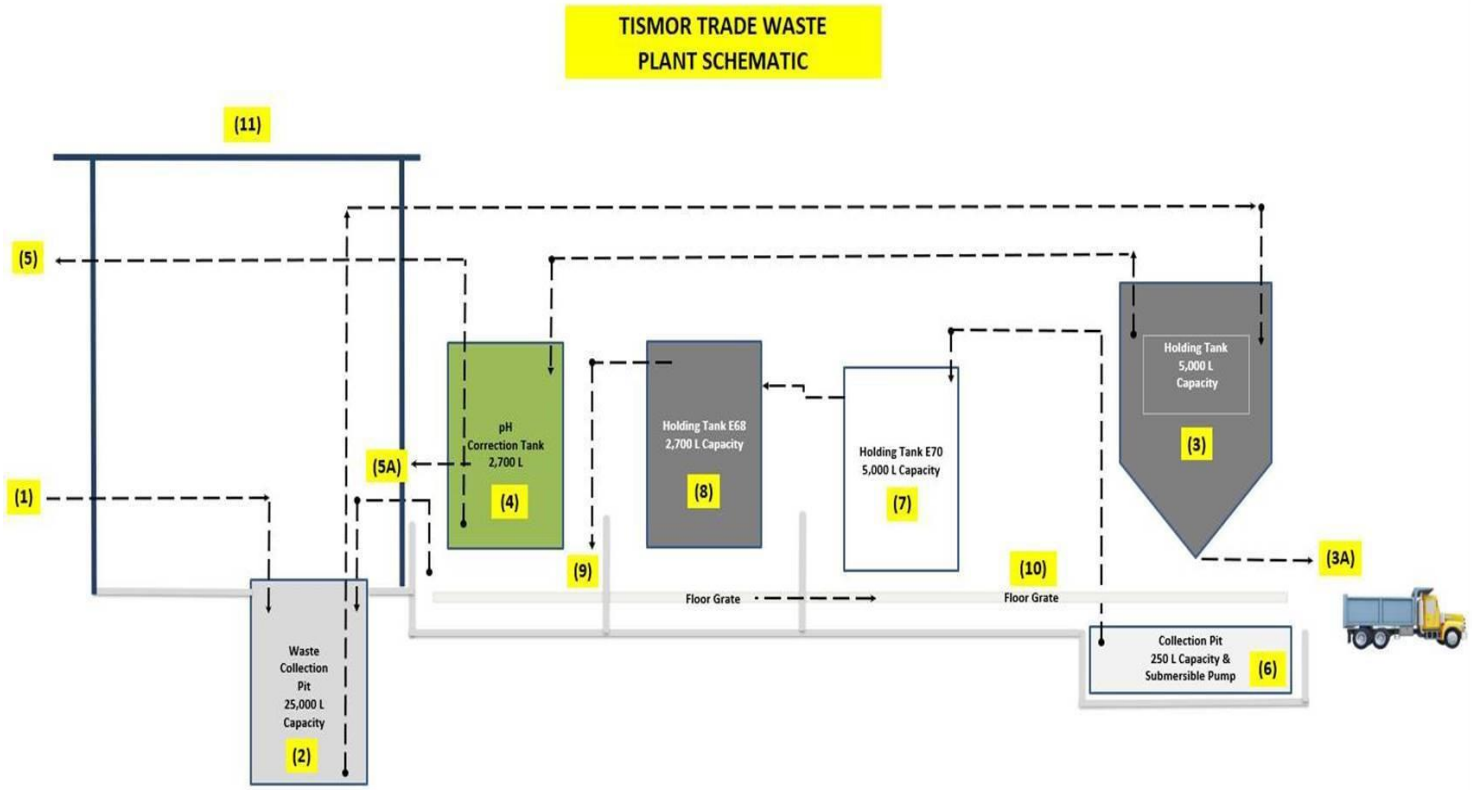
## Appendix 3. Satellite photo of site



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



## Appendix 4. Tismor Trade Waste Plant Schematic




**Trade Waste Process Flow:**

**(1)** ***Internal Trade Waste Line.***
- internal drain line from plant into waste collection pit (2).

***(2) Waste Collection Pit.***
- pit capacity is 25,000 L.
- fluid is transferred from this pit to sediment holding tank (3).

***(3) Sediment Holding Tank.***
- tank capacity is 5,000 L.
- fluid is held in this tank allowing sediment to take place.

***(3A) Sludge Collection Point.***
- sludge is discharged from sediment tank to tanker via coupling connections.
- any residue from sediment tank at this connection falls into the bunded area of the collection pit.

***(4) pH Correction Tank.***
- tank capacity is 2,700 L.
- fluid is transferred from holding tank (3) to pH correction tank (4).
- fluid is discharged to sewer (5).

***(5) & (5A) Sewer Discharge & Sampling Point.***
- self explanatory.
- tradewaste sampling is taken from location (5A).

***(6) Collection Pit.***
- pit capacity is 250 L.
- pit has a submersible pump.

***(7) Holding Tank E70.***
- tank capacity is 5,000 L.
- fluid from collection pit (6) is transferred via submersible pump to tank (7).

***(8) Holding Tank E68.***
- tank capacity is 2,700 L.
- fluid from holding tank (7) is transferred to holding tank (8).

***(9) Overflow Discharge Point into Bunded Area.***
- if tank (8) if full and overflows, excess fluid is discharged via over flow into floor bunded area and flows back into collection pit (2).

***(10) Floor Grate.***
- any fluid residue runs along this grate and into collection pit (6).
- any rain water runs along this grate and into collection pit (6).

***(11) Awning Enclosure.***
- trade waste collection pit (2) is covered by awning.

## Appendix 5 – Document History

## 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: | DA | Addition of: *Chemicals may enter water drains after spill*- in the Risk Associated Risks. | 22/08/14 | J.Corns |
| | Table 5: Storage Chemicals | A | Addition of Potential Failure to Meet Noise Limits, in accordance to EPA regulations. | | |
| | Potential Failure to Meet Noise Limits | A | Addition of: A. Incident Management Procedure for Communicating with the Community B. Notification of Adjacent Companies and Neighbours | | |
| | Incident Management Procedure for Communicating with the Community | | | | |
| 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 |
| all | all | all | TS-PIRMP-001 Version 4 is required to be updated due to new employee:<br>Change 'Pollution Incident and Control Personnel list'. Delete Ask Kumar, Chris Tisdale, Nick Yammine, Peter Zampino. Add Sonia Singh WHSE Coordinator 0417 703 723, Matthew Tisdale COO 0404 818 700, Thao Tran DS Supervisor 0404 818 705, Jacky Huang AS Supervisor 0452 526 199, Hooman Yakhchi DS Supervisor 0400 839 486 and Nathaniel Summers DS Manufacturing 0478 953 973. | 18/05/22 | S. SIngh |

| | | | | | |
|---|---|---|---|---|---|
| | | | Change 'VII Establishing Pollution Incident Management Team'. Change WHSE Manager to WHSE Manager/ Coordinator.<br><br>Change 'XIV External Contact Phone Number Listing'. Delete Ash Kumar and add Sonia Singh WHSE Coordinator 0417 703 723"<br><br>Refer to CC220117. | | |
| All | All | All | **Page 3** – add Rojli Rajon Chief Operating Officer 0405146092, Anthony Kiely Engineering Manager 0403528357.<br>**Page 3** – Change Matthew Tisdale title to Production Manager.<br>**All pages Footer** – Change issue date to 1 May 2023.<br>**Page 20** – Change '**XIV External Contact Phone Number Listing'**. Remove Matthew Tisdale and replace it with Rojli Rajon COO 0405146092.<br><br>Testing the plan section: add new row for 1/05/2023. | 22/05/2023 | S.Singh |
| All | All | All | Footer details – changed to reviewed by Connie Elfes; version no to 7; review date updated to March 2027 | 07.03.2024 | Connie Elfes |
| I | Background | All | Revised paragraph and additional details | 07.03.2024 | Connie Elfes |
| IV | Related Documentation | All | Revised list and additional details | 07.03.2024 | Connie Elfes |
| V | Facility Information | All | Updated with current details.<br>Pollution Incident Control Personnel list updated | 07.03.2024 | Connie Elfes |
| VII | Prevention of Pollution Incidents | All | Revised paragraph with additional information | 01.03.2024 | Connie Elfes |
| VIII | Establishing Pollution Incident Management Plan | All | Revised paragraph with additional information | 07.03.2024 | Connie Elfes |
| Table 1 | List of DG and maximum quantities permitted to be stored on site | All | Typical quantities updated | 07.03.2024 | Connie Elfes |
| XIV | External Contact Phone Number Listing | All | Updated list with current details | 07.03.2024 | Connie Elfes |
| XV | Incident Management Procedure for communicating with the community | All | A. Definition of Pollution Incident and Material Harm Incident<br>Second paragraph – revised with additional information | 07.03.2024 | Connie Elfes |

| | | | | | |
|---|---|---|---|---|---|
| XV | Incident Management Procedure for communicating with the community | All | B. Communication with the relevant authorities – section revised with additional and updated information | 07.03.2024 | Connie Elfes |
| XV | Incident Management Procedure for communicating with the community | All | C. Testing of the Plan – table updated with current information | 07.03.2024 | Connie Elfes |
| XVI | Actions to be taken during or immediately after a pollution incident | All | Revised with grammatical changes | 07.03.2024 | Connie Elfes |

**LEGEND**

| | |
|---|---|
| A = Additional Information | O = Other |
| D = Deletion of Information | N = New |
| R = Rewording | All = ADRON |