POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

JALCO Australia PTY. LTD.

PREMISES:

JALCO Australia

6 Ash ROAD, Prestons, NSW 2170

Jalco Australia PTY. LTD.
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

1. 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.

2. 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 Jalco Australia 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

3. SCOPE

This plan applies only to Jalco Australia Pty Ltd, known as the *License Applicant* of EPA License Number 20680. The premises is known as *Jalco Australia(Personal Care)* and located at 6 Ash Road, Prestons 2170.

Other Jalco sites which also hold an EPA license are not included in the scope of this plan.

Jalco sites which do not keep an EPA license are not included in the scope of this plan.

4. RELATED DOCUMENTATION

JA-SOP-81-03-Business Continuity Plan

5. FACILITY INFORMATION

Jalco Australia Pty. Ltd.

LICENSE NUMBER	20680
LICENSEE	JALCO AUSTRALIA PTY. LIMITED
LICENSE TYPE	PREMISES
PREMISES	JALCO AUSTRALIA 6 ASH ROAD PRESTONS, NSW 2170
SCHEDULED ACTIVITY	CHEMICAL STORAGE
FEE BASED ACTIVITY	CHEMICAL STORAGE WASTE GENERATION
REGION	METROPOLITAN LEVEL 3, NSW GOVT. OFFICES, 84 CROWN STREET WOLLONGONG NSW 2500 PHONE: 02 4224 4100 FAX: 02 4224 4100 P.O. BOX 513 WOLLONGONG EAST NSW 2520

6. 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 Site Business Manager(or delegate) 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.

An annual testing of the plan in the form of a Mock Pollution Incident shall be conducted by the Site Business 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.

7. 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:

- Group Human Resources Manager
- OH&S Committee Chairman and/or Member
- Site Business Unit Manager
- Technical Manager
- Site or Group Engineer
- Business Systems Manager
- Maintenance Manager
- Finance Director

8. POLLUTION INCIDENT & CONTROL COORDINATORS – CONTACT DETAILS

The Pollution Incident and Control Coordinators are responsible for activating this PIRMP and coordinating on-site pollution prevention and control.

Rahul Varghese (WHSE Advisor)
Working Hours Phone Number: 0408 607 417
After Hours Phone Number: 0408 607 417

Tina Nicolitsis (WHSE/Quality Manager)
Working Hours Phone Number: 0417 261 939

Pat Omprakash (Production Manager)
Working Hours Phone Number: 0425 305 863
After Hours Phone Number: 0425 305 863

Ikram Ansari (Engineering Manager)
Working Hours Phone Number: 02 8784 4911
After Hours Phone Number: 0406 384 764

Rod Etcell (Maintenance Manager)
Working Hours Phone Number: 0404 818 731
After Hours Phone Number: 0404 818 731

Geoff Biscaya (Site Manager)
Working Hours Phone Number: 0417689335
After Hours Phone Number: 0417689335

General Complaints Phone Number : 8784 4920

9. NOTIFICATION OF AUTHORITIES

In the case of a pollution incident causing or threatening material harm, the Site Manager or WHSE Department are authorised to notify relevant authorities of as per Section 148 of the POEO Act 1997.

10. DETAILS OF PRESENT SITE

Jalco Australia P/L occupies the office and manufacturing/warehousing facility located at 6 Ash Road, Prestons NSW. The manufacturing facility is used to blend powders and liquids to manufacture detergents and cosmetic products; a portion of the site is also used to manufacture plastic retail size containers. Warehousing areas on site are used to store raw materials; there is also use of wash bays and quality control laboratory on site. The exterior of the site is used as a receive / dispatch area and for the storage of Dangerous Goods.

The site is located within the George's River Catchment and sub catchment Liverpool District. Surrounding land uses are industrial and there is a creek line running parallel to the boundary on one side.

Manufacturing site –. The plant is located on close to 1.6 hectares of land with approximately 6500 square meters of building area. Adjacent development is light industrial.

The site is primarily a personal care manufacturing plant, with few cleaning products.

11. DESCRIPTION AND LIKELIHOOD OF HAZARDS

1. Storage of Chemicals

Register is kept and maintained for all Dangerous Goods stored or handled on site. MSDS for each Dangerous Goods and the Site Manifest are stored in the MSDS Box located in front office building.

Dangerous Goods register is maintained and updated by the site annually. There are five (5) Dangerous Goods Depots on site and these are stored in the following locations (Table 1):

Table 1: List of Dangerous Goods

PACKAGED STORAGE LOCATIONS

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
3 JAD 2A / BUNDF		ROOFLESS STORE		3		15,000L	
UN Number	**Correct Shipping Name**	**Class**	**PG (I, II, III)**	**Product or Common Name**	**Haz Chem Code**	**Typical Quantity**	**Unit, e.g. L. kg. m³**
1170	ETHANOL (ETHYL ALCOHOL)	3	II	ETHANOL	2YE	5000	L

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
1 JAD 2B / BUNDF		ROOFLESS STORE		8 (ACIDIC) & 9		30,000L	
UN Number	**Correct Shipping Name**	**Class**	**PG (I, II, III)**	**Product or Common Name**	**Haz Chem Code**	**Typical Quantity**	**Unit, e.g. L. kg. m³**
2586	ARYLSULFONIC ACIDS, LIQUID	8	III	GARDILENE SSAS	2X	10000	L
3149	CORROSIVE LIQUID, ACIDIC N.O.S	8	III	PROXITANE	2W	150	L

1805	Phosphoric Acid solution	8	III	Phosphoric Acid	2R	5000	L
2790	ACETIC ACID SOLUTION	8	II	ACETIC ACID SOLUTION	2R	200	L
3265	CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (Lactic Acid)	8	II	Lactic Acid	2X	6000	L

Identifier		**Type of Store Location**		**Store Location Class**		**Maximum Storage Capacity**	
2 JAD 3 / BUNDC		ROOFLESS STORE		8 (ALKALI) & 9		30,000L	
UN Number	**Correct Shipping Name**	**Class**	**PG (I, II, III)**	**Product or Common Name**	**Haz Chem Code**	**Typical Quantity**	**Unit, e.g. L. kg. m³**
1791	HYPOCHLORITE SOLUTION	8	III	SODIUM HYPOCHLORITE	2X	4000	L
1824	CORROSIVE LIQUID, BASIC, N.O.S	8	II	SODIUM HYDROXIDE SOLUTION	2R	7700	L

MANUFACTURING LOCATIONS

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
4 STORAGE (RAW MATERIAL STORE)		WAREHOUSE		9 & Non DG		100,000 KG	
UN Number	**Correct Shipping Name**	**Class**	**PG (I, II, III)**	**Product or Common Name**	**Haz Chem Code**	**Typical Quantity**	**Unit, e.g. L. kg. m³**
3077	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID NOS	9	III	VARIANT 442 1009 / ARQUAD 268-75PG	2X	2500	KG
3082	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID NOS	9	III	ALGENE CC29 VARIOUS PERFUMES / FRAGRANCES	3Z	3500	L

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
5 WORKSHOP		ENCLOSED ROOF STORE		2.1		100 M^3	
UN Number	**Correct Shipping Name**	**Class**	**PG (I, II, III)**	**Product or Common Name**	**Haz Chem Code**	**Typical Quantity**	**Unit, e.g. L. kg. m³**
1001	ACETYLENE, DISSOLVED	2.1		ACETYLENE	2S	4	M^3
1006	ARGON	2.2		ARGON	2T	36	M^3
1072	OXYGEN	2.2		OXYGEN	2S	10	M^3

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 Wasteflex Pty Ltd.

3. Storage of Waste Water and Other Liquid Wastes

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

Semi-dry sludge is removed as per the site's requirements by Enviro Waste Services Group Pty Ltd.

Rejected liquid bulk products are collected and disposed of accordingly by the above-mentioned licensed trade waste collectors

4. Potentially Offensive Odour

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.

12. RISK ASSESSMENT PROCESS

This risk matrix is based on PACT Group's Towards Zero Harm Procedure- PACT WHSE PRO 013-03 issued on 01/08/2018.

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	Extreme 5
A (almost certain)	H	H	E	E	E
B (likely)	M	H	H	E	E
C (possible)	L	M	H	H	E
D (unlikely)	L	L	M	H	H
E (rare)	L	L	L	M	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.
	Possible	Minor		Disposal of Waste		

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			Moderate 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.
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.

13. 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). Many 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	Waste water from manufacturing is diverted to the separation plan for treatment. As required by regulatory bodies, waste water is treated to meet the trade waste parameters before it is released to sewer. Composite and Discrete Samples are collected at a prescribed frequency by Sydney Water and tested by a NATA certified third party laboratory (ALS). 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.

14. External Contact Phone Number Listing:

EPA	131 555
NSW Ministry of Health	Business Hours: Liverpool Hospital, cnr Elizabeth & Goulburn Street, Liverpool 2170 Ph: 02 9828 3000 ask for Public Health Officer on call
Fire and Rescue NSW	000 - Emergency
NSW Ambulance	***000 - Emergency***
Work Cover NSW	13 10 50
Liverpool City Council	Phone: 1300 36 2170 (Business Hours) Fax**:** (02) 9847 6999
NSW Police	000 – Emergency
Sydney Water	***13 20 90***

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 or because of which there is likely to be a leak, spill or other escape or deposit of substance, because 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 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. Notification of Adjacent Companies and Neighbors

In the case of a material harm incident, prior to any other action, the initial observer must report the issue immediately to the General Operations Manager (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 (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
- Liverpool City 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 and Control Coordinators 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 Neighbors

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 neighbors

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 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 Jalco's Website
    4. Emailing of updates
    5. Door-knocking

D. 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 at the Jalco Personal Care Ash Road site. The PIRMP will also be tested within one month of any pollution incident occurring. Records of testing will be kept on site.

E. Review of PIRMP

The PIRMP will be reviewed every 12 months. The plan will be updated as required based on the current state of the site. Records of PIRMP revisions will be recorded.

F. 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, mobilize, work together to resolve the pollution incident.

Records of staff training will be maintained on site.

DOCUMENT CHANGE CONTROL PAGE

Version No.	Changes Made / Reason for Changes	Date:	Consultation/reviewed By:	Authorized By:
01	New document	10/07/2015	N. Singh	N. Singh
02	Changed Operations Manager from Shane Hawkens to Mo Hosein, removed typo to say that trade waste is treated and released to sewer.	13/07/2016	N. Singh	N. Singh
03	Removed Operations Manager and added new Site Manager	19/04/2017	N. Singh	N. Singh
04	Changed Site manager and QA manager	9/05/18	S. Singh	S. Singh
04	Amended details of pollution incident & control coordinators. Added persons authorized to notify authorities	19/10/18	H. Ram	H. Ram
05	Amended contact details for site incident control coordinators Amended quantities in the dangerous goods register Amended the details of waste disposal companies.	26/02/2020	Rahul Varghese	T. Nicolitsis