

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENSEE:

JALCO AUSTRALIA PTY. LTD.

PREMISES:

**JALCO HOUSEHOLD AND FABRIC CARE
277 – 303 WOODPARK ROAD, SMITHFIELD NSW 2164**

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1. Introduction

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN JALCO AUSTRALIA PTY LTD - JALCO HOUSEHOLD AND FABRIC CARE. 277 - 303 WOODPARK ROAD, SMITHFIELD NSW

PURPOSE:

Jalco Aust. Pty. holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Jalco Household and Fabric Care. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates. If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at 277 - 303 Woodpark Road, Smithfield NSW, and be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan has been developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009. Licensees should also refer to the NSW EPA's Guideline: Pollution Incident Response Management Plans.

2. Definitions

- **Control Equipment**

any apparatus or device used or designed:

- o to prevent, limit or regulate pollution (including any emission of noise), or
- o to monitor or to give warning of pollution (including any emission of noise), or
- o to give warning of any emission, leak, spill or other escape of substances causing pollution, and includes any apparatus or device that, though not so used, is or would, if properly maintained and operated, be capable (without modification) of being used but does not include any apparatus or device prescribed as excluded from this definition. An apparatus or device can be control equipment whether or not it is used for additional purposes or designed for other or additional purposes.

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- **Material Environmental Harm** under the POEO Act is:
 - o Actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
 - o 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
 - o 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.

- **Plant**
Plant is any equipment, apparatus, device, machine or mechanism, and includes any vessel, dredge, unit of rolling stock or crane, but does not include a motor vehicle

- **Pollution**
Pollution is the presence in, or introduction into the environment, of a substance which has harmful or poisonous effects. Includes any water, air, noise or land pollution.

- **Pollution Incident**
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.

- **Spill**
A spill is to cause or allow a substance to flow out of its container, especially unintentionally.

- **Waste**
 - o any substance (whether solid, liquid or gaseous) that is discharged, emitted or deposited in the environment in such volume, constituency or manner as to cause an alteration in the environment, or
 - o any discarded, rejected, unwanted, surplus or abandoned substance, or
 - o any otherwise discarded, rejected, unwanted, surplus or abandoned substance intended for sale or for recycling, processing, recovery or purification by a separate operation from that which produced the substance, or
 - o any processed, recycled, re-used or recovered substance produced wholly or partly from waste that is applied to land, or used as fuel, but only in the circumstances prescribed by the regulations, or
 - o any substance prescribed by the regulations to be waste.

A substance is not precluded from being waste for the purposes of this Act merely because it is or may be processed, recycled, re-used or recovered.

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3. JALCO Reference Documents

- JHF-WI-022 – Emergency Spill Procedure – Yard
- JHF-WI-023 – Enzyme Emergency Spill Procedure
- Jalco Homecare Emergency Procedure Manual (JHF-EPM-001).
- Onsite Stormwater Management Manual
- Onsite Wastewater Management Manual
- JHF-SM-007— Site Manifest Plan
- Jalco Australia Odour Management Plan (Benbow Environmental, 2019, Ref: 191094-03_OMP_REV3)
- JHF-SOP-079 - Management of fragrance containing products

4. Environment Protection Licence (EPL) Details

Name of licensee:

Jalco Aust. Pty. Ltd (45 075 091 833)

EPL number:

2746

Premises name and address:

JALCO HOUSEHOLD AND FABRIC CARE
277-303 WOODPARK ROAD
SMITHFIELD NSW 2164

Company or business contact details:

General Enquiries: (02) 9757 6333

Emergency Contact: 1800 242 176

Website address:

Jalco.com.au

Scheduled activity/activities on EPL:

Chemical production

Fee based activity/activities on EPL:

Dangerous Goods Production >25,000 T Annual Production Capacity.

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5. Pollution Incident – Persons Responsible

Managing response to pollution incident

Name: Shane Roberts
 Position or Title: Operations Manager
 Business hours contact number: 0417 206 391
 After hours contact number: 0417 206 391
 Email: Shane.Roberts@pactgroup.com

Pollution Incident and Control Coordinators

Name: Shane Roberts
 Position or Title: Operations Manager
 Business hours contact number: 0417 206 391
 After hours contact number: 0417 206 391
 Email: Shane.Roberts@pactgroup.com

Name: Gaynor Daniels
 Position or Title: WHSE Advisor
 Business hours contact number: 0438 345 802
 After hours contact number: 0438 345 802
 Email: Gaynor.Daniels@pactgroup.com

Name: AJ Afualo
 Position or Title: Warehouse Supervisor
 Business hours contact number: 0419 166 115
 After hours contact number: 0419 166 115
 Email: Aj.Afualo@pactgroup.com

Name: Shalini Singh
 Position or Title: QA Manager
 Business hours contact number: 0404 818 746
 After hours contact number: 0404 818 746
 Email: Shalini.Singh2@pactgroup.com

Notifying relevant authorities

Name: Michael Beaton
 Position or Title: General Manager Manufacturing Operations
 Business hours contact number: 0418 456 418
 After hours contact number: 0418 456 418
 Email: Michael.Beaton@pactgroup.com

The General Manager Manufacturing Operations can nominate another General Manager or Site Representative to notify relevant authorities.

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6. Notification of Relevant Authorities

NSW Environment Protection Authority
131 555

NSW Ministry of Health
1300 066 055

Fire and Rescue NSW - Emergency
000

SafeWork NSW
13 10 50

Cumberland City Council
Business Hours
Ph: (02) 8757 9000

Sydney Water
132 092

7. Notification of Neighbours and the Local Community

ALS Environmental
277 – 289 Woodpark Road, Smithfield
(02) 8784 8555

Fresenius Medical Care Australia
305 Woodpark Rd, Smithfield
(02) 8788 5900

Café Krunch
317 Woodpark Rd, Smithfield
(02) 9757 3930

JDMyard
25/317-321 Woodpark Rd, Smithfield
(02) 9757 2364

Lion Dairy and Drink (Beqa)
253/257 Woodpark Rd, Smithfield
(02) 9827 4600

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Dowell Windows

312 Woodpark Rd, Smithfield
(02) 9757 0555

Statewide Bearings

2/324 Woodpark Rd, Smithfield
(02) 9616 0000

Auto Parts Group

2/338 Woodpark Road, Smithfield
(02) 8785 4599

Tasfreight

352 Woodpark Road, Smithfield
(02) 9725 2049

JAS Oceania

3/364 Woodpark Road, Smithfield
(02) 9604 8644

Residences on Gardenia Parade

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 or when it becomes available and necessary to be passed on. Updates will be provided to the community as follows:
 - a) Face to face contact or telephone call.
 - b) Letterbox drops.
 - c) Publication of updates on Jalco's Website.
 - d) Emailing of updates; and
 - e) Doorknocking.

8. Minimising Harm to Persons on the Premises

In case of an incident, all staff, guests and contractors must follow the instructions of site wardens or emergency personnel. Unless instructed otherwise, all people (bar wardens and emergency personnel) must immediately evacuate to the muster point located next to the exit gate to Woodpark Drive.

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Using whatever means they have at their disposal, wardens shall ascertain numbers of staff, guests and contractors present on site. Wardens will conduct a sweep of the site and once a room/office/workspace is checked and cleared, it must be tagged out to ensure the facility is fully evacuated and all people on site are accounted for.

No-one shall re-enter the site until emergency personnel or site wardens give the all clear signal.

9. Actions to be Taken During or Immediately after a Pollution Incident

IMMEDIATE CONSIDERATION

- **If safe to do so contain the spill, leak or escape of pollutant** - In the event of a pollution incident, the spill leak or escape of pollutants must be controlled and contained). If operation of onsite plant or pumps is causing the pollution incident, then the affected system must be shutdown.
- **Call 000 in an Emergency** - 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.

INTERNAL NOTIFICATION

- **Report to Supervisor** - Prior to any other action, the initial observer must report the issue immediately to their supervisor or the Operations Manager.
- The Operations Manager is to follow Jalco's internal reporting process.

NOTIFICATION TO THE REGULATOR

- **Determine if a Notifiable Incident** - After the initial response to any events that may cause immediate harm to human health or property the Workplace Manager will determine if the event constitutes an "actual or potential material harm incident" in consultation with relevant stake holders.
- **Notify Authorities** - In the event of a "material harm incident" the following authorities need to be contacted as per notification of relevant authorities' (Section **Error! Reference source not found.**), immediately after becoming aware of the incident, under the legislative duty to notify:
 - EPA
 - Cumberland City 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

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- 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.

RESPONSE TO INCIDENT

If the incident does not pose any threat to human health or property, 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
- Clean-up the pollution incident. Spill procedures are contained in the following documents:
 - JHF-WI-022 – Emergency Spill Procedure – Yard
 - JHF-WI-023 – Enzyme Emergency Spill Procedure

10. Emergency Evacuation Procedure

The Jalco emergency evacuation Assembly Point is located on the grassed areas immediately in front of the main office entrance and is identified with an ‘Assembly Point’ sign. In the event of an evacuation the Jalco Homecare Emergency Procedure Manual should be followed (JHF-EPM-001).

11. Action to Combat Pollution Following Incident

A description of actions taken to combat pollution caused by the incident are described in each relevant listed incident safety section.

12. Inventory of Pollutants

A register is kept and maintained for all Dangerous Goods stored or handled on site (Site Manifest). Safety Data Sheets (SDS’s) for each Dangerous Goods and the Site Manifest are stored in the SDS Box located in front office building.

The Site Manifest is updated by the site annually or when required by legislation. Most of these Dangerous Goods are stored on the Production side of the property. In the event of a chemical spill on the hardstand, the spill is directed toward Wastewater Pit (Pit 2) (Appendix C).

All surface water or chemical run-off from delivery trucks in this zone is also directed to Wastewater Pit 2. This Pit has the provision to divert collected surface and/or rainwater to the stormwater system when resulting water quality is acceptable, and to the wastewater system when water quality is unacceptable (As per the Onsite Stormwater and Wastewater Management Manuals).

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If a spill occurs, depending on the type of dangerous goods and waste-water treatment capability, chemicals will be recovered into containers then removed offsite by Road Tanker to an appropriately licenced waste disposal facility.

Below is the list of all dangerous goods storage areas and direction of bund water. Appendix D provides the Manifest Site Plan.

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Classification: Internal



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HAZARDOUS CHEMICALS STORED IN TANK

STORAGE #	TYPE	MAXIMUM STORAGE CAPACITY (L)	UN #	SHIPPING NAME	CLASS	PG	PRODUCT NAME	HAZCHEM CODE	TYPICAL QUANTITY (L)
ST 1	AGT	10,000	1824	Sodium Hydroxide Solution	8	II	Caustic Soda 50%	2R	8,000
ST 2	AGT	10,000	1824	Sodium Hydroxide Solution	8	II	Caustic Soda 50%	2R	8,000
ST 3	AGT	23,000	1791	Hypochlorite Solution	8	II	Sodium Hypochlorite	2X	15,000
ST 4	AGT	23,000	1791	Hypochlorite Solution	8	II	Sodium Hypochlorite	2x	15,000
ST 14	AGT	10,000	1760	Corrosive Liquid, N.O. S	8	II	Gardiquat 1450	3X	8,000
ST 15	AGT	15,000	2586	Alkylsulphonic Acids, Liquid	8	III	LABSA – Gardilene SSAS	2X	12,000
ST 16	AGT	15,000	2586	Alkylsulphonic Acids, Liquid	8	III	LABSA – Gardilene SSAS	2X	12,000
ST 17	AGT	20,000	2586	Alkylsulphonic Acids, Liquid	8	III	LABSA – Gardilene SSAS	2X	15,000
ST 21	AGT	17,000	2586	Alkylsulphonic Acids, Liquid	8	III	LABSA – Gardilene SSAS	2X	12,000

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ST 23	AGT	4,300	1075	Petroleum Gas Liquefied	2.1	N/A	LPG	2YE	3,500
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ST = Storage Tank, BT = Buffer Tank, AGT = Above Ground Tank; UST= Underground Storage Tank; N/A = Not Applicable

HAZARDOUS CHEMICALS STORED IN PACKAGE STORAGE

STORAGE #	TYPE	MAXIMUM STORAGE CAPACITY (L)	UN #	SHIPPING NAME	CLASS	PG	PRODUCT NAME	HAZCHEM CODE	TYPICAL QUANTITY (L)
PS 1	Package	30,000	3378	Sodium Carbonate Peroxyhydrate	5.1	II	Sodium Percarbonate	1Y	24,000
PS 2	Package	10,000	3253	Disodium Trioxosilicate	8	III	Sodium Metasilicate Pentahydrate	2X	4000
PS 5	IBC	20000	3267	Corrosive Liquid, Basic, Organic, N.O.S.	8	III	Trilon BX Liquid	2X	1,000
			1760	Corrosive Liquid, N.O. S	8	II	Gardiquat 1450 (IBC)	3X	9,000
PS 7	Container	20,000	1169	Extracts, Aromatic Liquids	3	III	Perfume	2[Y]E	10 000
			1170	Ethanol	3	II	Ethyl Alcohol	2[Y]E	1,000
			1993	Flammable Liquid, N.O. S	3	III	Eucalyptus Compound & Oil	3Y	4,500

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			2052	Dipentene	3	III	Pinechem 560	3Y	1,500
PS 8	IBC	2,000	2014	Hydrogen Peroxide, Aqueous Solution	5.1, 8	II	Hydrogen Peroxide 50%	2P	1,000
PS 9	IBC	4,000	1830	Sulphuric Acid	8	II	Sulphuric Acid 50%	2P	1,000
			1789	Hydrochloric Acid	8	II	Hydrochloric Acid	2R	1,000
PS 10	IBC/ Drum	15,000	3265	Corrosive Liquid, Acidic, Organic, N.O.S.	8	II	Lactic Acid	2X	4,000
			3265	Corrosive Liquid, Acidic, Organic, N.O.S.	8	II	Acticide RS	2X	3,000
			2586	Alkylsulphonic Acids, Liquid	8	III	LABSA Gardilene SSAS	2X	6,000

HAZARDOUS CHEMICALS USED IN PROCESS OR MANUFACTURING AREA

STORAGE #	TYPE	MAXIMUM STORAGE CAPACITY (L)	UN #	SHIPPING NAME	CLASS	PG	PRODUCT NAME	HAZCHEM CODE	TYPICAL QUANTITY (L)
PA 1	Blending/ Manufacturing	400	1169	Extracts, Aromatic Liquids	3	III	Perfume	2[Y]E	200

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PA 2	Process/ Package	1,000	3,378	Sodium Carbonate Peroxyhydrate	5.1	II	Sodium Percarbonate	1Y	1,000
PA 3	Process	400	1169	Extracts, Aromatic Liquids	3	III	Perfume	2[Y]E	200
PA 4	Process	1,000	3,378	Sodium Carbonate Peroxyhydrate	5.1	II	Sodium Percarbonate	1Y	1,000
PA 5	Process	1,000	3,378	Sodium Carbonate Peroxyhydrate	5.1	II	Sodium Percarbonate	1Y	1,000
PA 7	Process	1,000	1830	Sulphuric Acid	8	II	Sulphuric Acid 50%	2P	1,000

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13. Description and Likelihood of Hazards

The following sections provide a detailed description of:

- each hazard to human health or the environment present on site to which licence 2746 relates;
- the likelihood and consequence of the hazard and associated risk;
- pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises; and safety equipment or other devices used to minimise the risks to human health and the environment and to contain or control a pollution incident.

14. Staff Training

Staff will undertake online training, as well as participate in drills and practical exercises. The objective of staff training is as follows:

Individuals –

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

Multi-Department 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.

15. Testing and Updating of PIRMP

The PIRMP will be tested on an annual basis during the life of the EPA licence. Testing will be by way of desktop simulations, practical exercises and drills undertaken at the Smithfield site.

The PIRMP will be tested within one month of any pollution incident occurring, or at least once in every 12-month period.

Records of testing will be maintained; Appendix A provides the details of PIRMP Tests undertaken and Appendix B will record the summary in PIRMP.

The PIRMP will be reviewed following each test to ensure it remains up to date with the current site conditions. Records of PIRMP revisions will be recorded in the Document Control section of this document.

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16. Risk Analysis – Likelihood vs Consequence (As per PACT Group WHSE Risk Matrix)

Likelihood	Consequence				
	1 Very Low	2 Low	3 Moderate	4 High	5 Very High
5 (Almost certain)	Moderate (C)	High (B)	High (B)	Very High (A)	Very High (A)
4 (Likely)	Moderate (C)	High (B)	High (B)	Very High (A)	Very High (A)
3 (Possible)	Low (D)	Moderate (C)	High (B)	High (B)	Very High (A)
2 (Unlikely)	Low (D)	Moderate (C)	Moderate (C)	High (B)	Very High (A)
1 (Rare)	Low (D)	Low (D)	Moderate (C)	Moderate (C)	High (B)

Level	Description
Almost certain	Is expected to occur (More than 50 times per year or 1 time per week)
Likely	Will probably occur (10-50 times per year or more than once a month but less than once a week)
Possible	May occur at some time (More than once a year but less than once a month. Or has occurred on another site)
Unlikely	Is not anticipated to occur (Less than once every 5 years, but has occurred on another site)
Rare	May occur only in exceptional circumstances (Less than once every 5 years)

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17. Risk Analysis – Action Required

Very High (A)	Immediate action required
High (B)	Senior management attention required
Moderate (C)	Management responsibility must be specified
Low (D)	Manage by routine controls and procedures

18. Risk – Storage of Chemicals

18.1 Likelihood of hazard

Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Storage of Chemicals	Toxic Effects of Chemicals to Human Health	Unlikely (2)	Moderate (3)	Moderate Risk (C)	Chemical spill during receipt or transfer of chemicals	Procedures for the receipt and decanting of chemicals are in place. Spill kits are located nearby chemical storage depots. In case of spill, refer to SDS for the appropriate handling.

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Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
	Flammability of Chemicals	Unlikely (2)	Moderate (3)	Moderate Risk (C)	Flammable chemicals not stored in the designated storage area	Dangerous goods are kept at the designated storage location. Incoming Goods Receiver checks delivery docket and identify which storage area the goods will be stored and ensure immediate storage in correct area.
	Corrosive Effects of Chemicals	Unlikely (2)	Moderate (3)	Moderate Risk (C)	Corrosive chemicals not stored in the designated corrosive depot	Dangerous goods are kept at the designated storage location. Incoming Goods Receiver checks delivery docket and identify which storage area the goods will be stored and ensure immediate storage in correct area.

18.2 Control Equipment and Management Processes

Identified Hazard	Description of Control Equipment and Management Processes
Storage of Chemicals	<p>The location of Spill kits are identified on the Manifest Site Plan JHF-SM-007 (Appendix D) to be deployed as first stage of spill management</p> <p>All dangerous goods are stored in the designated depots as illustrated the Manifest Site Plan (JHF-SM-007).</p>

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Identified Hazard	Description of Control Equipment and Management Processes
	<p>All storage tanks built on bunds to contain spills or leaks from the tanks located on the western side of the site. This side of the property is deemed contaminated side due to the location of the storage areas and raw materials delivery and receiving occur on this area as well. Any runoff on this area – be it chemicals or water - will be diverted to the trade waste plant for treatment.</p> <p>Chemicals are received and/or decanted based on the current procedures in place.</p> <p>In case of chemical leak, the site has a Self-Containing Breathing Apparatus (SCBA). A number of employees and members of the maintenance team have been trained to use SCBA.</p>

19. Risk – Storage of Solid Waste

19.1 Likelihood of hazard

Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Storage of Solid Waste	Incorrect disposal of Waste	Rare (1)	Very Low (1)	Low Risk (D)	Waste not separated and categorised appropriately to allow for correct disposal	Wastes are separated in types of recycling and other forms of wastes. Solid wastes from manufacturing and production are collected by a licensed waste contractor.
	Congested work and storage areas	Rare (1)	Very Low (1)	Low Risk (D)	Failure to collect waste based on agreed frequency with the licensed waste collector	Solid wastes from manufacturing and production are collected daily as per agreement with the licensed waste collector.

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19.2 Control Equipment and Management Process

Identified Hazard	Description of Control Equipment and Management Processes
Storage of Solid Waste	Solid wastes to be stored in skip bins provided by a licensed solid waste management company. Waste to be collected daily and disposed to a solid waste landfill or disposal facility.

20. Risk – Storage of Wastewater

20.1 Likelihood of hazard

Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Storage of Wastewater and potential discharge to stormwater	Disposal of Wastewater	Possible (3)	Low (2)	Moderate Risk (C)	Failure to collect sludge from DAF based on agreed frequency with the licensed waste contractor	Sludge is collected by the licensed waste contractor – Enviro Waste Services, at the request of the DAF operator who monitors the Sludge Holding Tank capacity.
	Possible breach to Sydney Water Agreement	Possible (3)	Moderate (3)	High Risk (B)	Too much surfactant, or any other substances that disrupt chemical and biological balance in the DAF plant	In the event of overflow from the wastewater treatment plant, the wastewater is transferred to the 20 KL Overflow Tank and the Balance Tank Bund. Any overflows exceeding this additional capacity will be pumped into temporary IBC's or pumped into a Road

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Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
					Excessive rain causing the site containment system to overflow and lead to stormwater contamination as there is no physical separation between stormwater and wastewater system on production side of the facility	Tanker by licensed contractor. This prevents any possible overflow of wastewater entering other areas of the site or offsite. Separation of stormwater and wastewater is being considered as part of overall wastewater and stormwater management.

20.2 Control Equipment and Management Process

Identified Hazard	Description of Control Equipment and Management Processes
Storage of Wastewater and other Liquid Waste	Wastewater from manufacturing is diverted to the DAF plant for treatment. As required by regulatory bodies, wastewater is treated to meet the trade waste parameters before it is released to Sydney Water's Sewer Network. Composite and Discrete Samples are collected at a prescribed frequency by Jalco, tested by a NATA certified third party laboratory (ALS Laboratory) and the results forwarded onto Sydney Water. 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 (at least twice a month).

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21. Risk – Storage of Liquid Waste/ Hazardous Waste/ Special Waste

21.1 Likelihood of hazard

Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Storage of Liquid Waste, Hazardous Waste and Special Waste	Liquid Waste spill or contamination from hazardous waste	Possible (3)	Low (2)	Moderate Risk (C)	Failure to collect liquid waste based on agreed frequency with the licensed waste contractor	Waste is separated on site, with liquid wastes removed from site by the licensed waste contractor Liquid and hazardous wastes are stored in bunded containers or IBC's.

21.2 Control Equipment and Management Process

Identified Hazard	Description of Control Equipment and Management Processes
Storage of Liquid Waste, Hazardous Waste and Special Waste	Waste is separated on site, with liquid wastes removed from site by the licensed waste contractor. Liquid and hazardous wastes are stored in bunded containers or IBC's, Bunds drain to DAF Plant for treatment or are pumped into IBC's for removal, reducing risk of spill entering stormwater drainage system.

22. Risk – Potential failure of Chemical/ Contaminated Water Storage Tanks

22.1 Likelihood of hazard

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Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Potential Failure of Storage Tanks	Toxic Effects of Chemicals to Human Health	Unlikely (2)	Low (2)	Moderate Risk (C)	Uncontrolled spill or leaking Storage Tanks	<p>All storage tanks are located in the western side of the site and bunded. Any spill that occurs can be captured and contained within the site. All runoff in this area is diverted to the on-site wastewater treatment plant.</p> <p>Any liquid chemical spills are collected into IBC's for removal by licenced contractor.</p>
	Release of chemicals to DAF Plant	Unlikely (2)	Low (2)	Moderate Risk (C)	Uncontrolled spill or leaking Storage Tanks	<p>All storage tanks are located in the western side of the site and bunded. Any spill that occurs can be captured and contained within the site. All runoff in this area is diverted to the on-site wastewater treatment plant.</p> <p>Any liquid chemical spills are collected into IBC's for removal by licenced waste contractor.</p>

22.2 Control Equipment and Management Process

Identified Hazard	Description of Control Equipment and Management Processes
Potential Failure of Storage Tanks	Storage tanks are situated within bunded areas. Storage tanks and bund capacities are identified on the Manifest Site Plan (JHF-SM-007).

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23. Risk – Potential Failure of Stormwater Drainage

23.1 Likelihood of hazard

Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Potential Failure of Stormwater Drainage	Release of potentially harmful environmental substances to storm water	Unlikely (2)	Low (2)	Moderate Risk (C)	<p>Failure of site stormwater isolation valve in Pit 2</p> <p>Failure to test quality of water to be discharged.</p> <p>Torrential Rainfall</p>	<p>Stormwater system connected to wastewater treatment plant is isolated. Discharge of treated wastewater to sewer is done by a trained operator and only when required wastewater parameters are met.</p> <p>Site procedure is in place for the discharge of site storm water to council drainage.</p> <p>Use of temporary IBC's and Road Tanker in case of torrential rain that could flood the site, which is closely monitored by the DAF Operator and QA/QC Manager. Enviro Waste Services is on 24-hour call out, as per the procedures detailed in the Onsite Stormwater Management Plan</p> <p>Shift Supervisor shall call Enviro Waste Services and escalate to Maintenance Manager and Site Operations Manager</p>

23.2 Control Equipment and Management Process

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Identified Hazard	Description of Safety Equipment and Management Processes
Potential Failure of Stormwater Drainage	<p>There are two storm water discharge systems on site. The Storm Water Pit1 located at the Main Gate on the Western Driveway and a second one located inside the ground pit located on the ALS site directly opposite the main reception at the Woodpark Road entrance. This gate valve is monitored, maintained and operated by ALS staff. Flow of storm water through the facility is controlled via a network of drains and pits</p> <p>Water entering the Western Production side of the site is captured and treated through the wastewater treatment system. Enviro Waste Services is on 24 hour call out in the event of an extreme rain event where on-site water volumes exceed the site capacity. Enviro Waste Services will provide Road Tankers to capture and safely remove excess water offsite to a suitable treatment facility.</p>

24. Risk – Potential Failure to meet Noise Limits

24.1 Likelihood of hazard

Noise limits for the premises are as follows (as per current EPL):

- 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.

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Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Failure to Meet Noise Limits	Noise exceeding set out in the site's EPA License	Unlikely (2)	Low (2)	Moderate Risk (C)	Worn out rotary valves of Powders Plant Blow down of Compressor Traffic in rear yard after hours	Acoustic wall at the northern boundary Maintenance of relevant noise control equipment Reporting System where Operators are to call attention of Fitters for unusual noise in the powders plant Blow down occurs between 0700H to 2200H and takes less than 15 minutes to complete. Preclude work in the rear of the yard between 7pm-7am Monday to Friday and from 3pm Saturday until 7am Monday. This includes: <ul style="list-style-type: none"> • Forklift operation • Receiving of trucks • Bin or container movements
	Community complaints	Possible	Moderate	High	Same as above	Same as above

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24.2 Control Equipment and Management Process

Identified Hazard	Description of Control Equipment and Management Processes
Potential Failure to Meet Noise Limits	Preclude work in the rear of the yard between the 7pm-7am Monday to Friday and from 3pm Saturday until 7am Monday. 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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25. Risk – Potential Release of Air Pollutants

25.1 Likelihood of hazard

Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Potential Release of Air Pollutants	Toxic Effects of Air Pollutants to Human Health	Unlikely (2)	Low (2)	Moderate Risk (C)	Failure of currently installed control technology	Control Technology for each air emission locations in the site is serviced at a prescribed frequency by the providers. Any parts are replaced on a per need basis determined by the service providers.
	Release of potentially harmful environmental substances in air	Unlikely (2)	Low (2)	Moderate Risk (C)	Failure of currently installed control technology	Control Technology for each air emission locations in the site is serviced at a prescribed frequency by the providers. Any parts are replaced on a per need basis determined by the service providers.

25.2 Control Equipment and Management Process

No	Source Description	Control Technology	Monitoring Frequency	Maintenance Program											
1	Boiler – Package Steam Boiler	Combustion Analysis Annually	5 weekly/ 3 monthly/6 monthly Inspection & Service Annual Inspection & Service	Monthly inspection & service by RCR Tomlinson Energy Service as per Australian Standards for unattended boilers.											
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #D3D3D3;"> <th style="width: 15%;">Reviewed By</th> <th style="width: 15%;">Approved By</th> <th style="width: 15%;">Document No.</th> <th style="width: 15%;">Issue Date</th> <th style="width: 15%;">Next Review Due</th> <th style="width: 10%;">Pages</th> </tr> </thead> <tbody> <tr> <td>Gaynor Daniels</td> <td>Michael Beaton</td> <td>JHF-PIRMP-001-09</td> <td>November 2023</td> <td>August 2024</td> <td>30 of 40</td> </tr> </tbody> </table>					Reviewed By	Approved By	Document No.	Issue Date	Next Review Due	Pages	Gaynor Daniels	Michael Beaton	JHF-PIRMP-001-09	November 2023	August 2024
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2	Release of dust particles at the Powders Manufacturing – Bag House Outlet	Dust extraction cyclones & Bag House	3 monthly inspection & Service	Inspection & Service by Solaft Filtration. Parts replaced as required. Pressure differential checked and evidence of powder on air outlet reviewed to establish need for replacement
3	Release of chemical mists/aerosols from the Liquids Manufacturing Wet Scrubber	Wet Scrubber	6 monthly Inspection & Service	Inspection and Service by Solaft Filtration
4	Release of chemical mists/aerosols from the QC Fume Cupboard	Wet Scrubber in Fume Cupboard	6 monthly Inspection & Service	Inspection and Service by Solaft Filtration
5	Release of chemical mists/aerosols from the Liquids Filling Wet Scrubber	Wet Scrubber	6 monthly Inspection & Service	Inspection and Service by Solaft Filtration
6	Release of dust particles at Silo Bag house 1	Bag house	3 monthly inspection & Service	Inspection & Service by Solaft Filtration. Parts replaced as required. Pressure differential checked and evidence of powder on air outlet reviewed to establish need for replacement
7	Release of dust particles at Silo Bag house 2	Bag house	3 monthly inspection & Service	Inspection & Service by Solaft Filtration. Parts replaced as required. Pressure differential checked and evidence of powder on air outlet reviewed to establish need for replacement
8	Release of odor from filling lines and liquid manufacturing	Air Curtain on roller door	6 monthly inspection & service	Inspection & service internally

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26. Risk – Potential Release of Air Pollutants

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 if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimizing odour.

The offensive odour provision of the POEO Act focuses on the impact of odour on people and their activities, while the general provisions deal with the cause of an odour. The general provisions make it an offence for any person to undertake an activity that emits air pollution (including odour) if the emission is caused by a failure to maintain or operate plant, or to deal with materials in a proper and efficient manner.

26.1 Likelihood of hazard

Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Emission of Potentially Offensive Odour	Regulatory Action	Possible (3)	High (4)	High Risk (B)	(i) FRAGRANCE-CONTAINING PRODUCTS <i>Incorrect storage & handling</i>	Storage & Handling: <ul style="list-style-type: none"> - Raw materials identified as fragrance in site chemical register, are stored and decanted in enclosed buildings. - All doors remain closed via automatic door-closing mechanisms (when not in direct use). - Extraction system/scrubber used and maintained in equipment maintenance regime. - Tank lids remain closed unless in use. - Damaged/leaking containers removed and disposed of in enclosed container.

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Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
					<p><i>Inadequate cleaning & waste disposal</i></p> <p><i>Inadequate spill management</i></p> <p><i>Inadequate Monitoring</i></p> <p>(ii) WASTEWATER</p>	<ul style="list-style-type: none"> - Residual product on drums/equipment cleaned after use and cleaning materials disposed of. - Bunded areas cleared of waste liquid (internal and external). - Tank clean out and liquid waste disposed immediately to Dissolved Air Flotation (DAF) Plant, or stored in closed containers until treatment. - Solid waste sealed & stored in enclosed container until disposed offsite. <p>Management of fragrance spill</p> <ul style="list-style-type: none"> - Spill trays used whenever fragrances are decanted - Any spill collected is disposed of in sealed container immediately and spill trays cleaned. - Report any spill immediately <p>Inspection and monitoring</p> <ul style="list-style-type: none"> - Monthly inspection of external drainage system points for visible external blockages. - Monthly odour inspection using VelocityEHS. - Employees' made aware of odour management requirements (toolbox talks at least 6 monthly).

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Identified Hazard	Associated Risk/s	Likelihood	Consequence	Level of Risk	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
					<i>Failure of wastewater control systems</i>	
	Complaints from neighbours	Possible (3)	Moderate (3)	High Risk (B)	As above	As above
	Reputation Risk	Possible (3)	Moderate (3)	High Risk (B)	As above	As above

26.2 Control Equipment and Management Process

No	Source Description	Control Technology	Monitoring Frequency	Maintenance Program
1	Release of chemical mists/aerosols from the Liquids Manufacturing Wet Scrubber	Wet Scrubber	6 monthly Inspection & Service	Inspection and Service by Solaft Filtration
2	Release of chemical mists/aerosols from the Liquids Filling Wet Scrubber	Wet Scrubber	6 monthly Inspection & Service	Inspection and Service by Solaft Filtration
3	Release of odour from filling lines and liquid manufacturing	Air Curtain on roller door	6 monthly inspection & service	Inspection & service internally

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27. Document Control Register

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
All	All	A	Added requirements as set in the EPA Licence, Potential Failure to Meet Noise Limits, Testing and Review of Plan and Staff Training	23/12/13	M. Matienzo
All	All	A	Additional information included on the notification and early warnings for premises/persons in the vicinity has been updated to meet the requirements of the regulation. Updated to current emergency contact list.	22/12/14	J. Corns
V	Pollution Incident and Control Coordinator	D/A	Updated to current emergency contact list	06/11/2017	S. Singh
IX	Description and Likelihood of Hazards	D/A	Updated to current list of dangerous goods list. Table 3 and 4 updated with current service providers.		
V	Pollution Incident and Control Coordinator	D/A	Updated to current emergency contact list and current list of dangerous goods list. Table 3 and 4 updated with current service providers.	21/10/2018	S. Singh
IX	Description and Likelihood of Hazards	D/A			

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V IX	Pollution Incident and Control Coordinator Table 9: Risk Rating of Site Hazards	D/A A	Updated to current contact list Updated Pre-emptive Actions Required or In Place for 1) Potential Failure of Stormwater Drainage and 2) Failure to Meet Noise Limits	10/07/2019	S. Singh
All	All	A/ N/ O	Updated to match POEO Act Requirements	July 2020	Avishek Biswas (With assistance from Greencap)
5	Pollution Incident – Persons Responsible	D/A	Updated current contact list ,Appendix C stormwater network diagram and Appendix D site manifest plan diagram	12/08/2021	Christine Kazzi
5	Pollution Incident – Persons Responsible	A	Updated contact list and made a note GM operations can nominate person to notify authorities	18/08/2022	Christine Kazzi
5	Pollution Incident – Persons Responsible	D/A	Updated contact list.	28/11/2023	Gaynor Daniels

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

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Appendix A: PIRMP Test Report Format

Note: This is only a Mock Pollution Incident Exercise to test PIRMP. PIRMP may be updated based on the findings of the test.			
Date of Exercise:			
Start Time:		Finish Time:	
Mock Pollution Incident Coordination Team Members			
Leader			
Member			
Description of Mock Pollution Incident Scenario			
Pollutant Name	Type of Pollution (Air/ Noise/ Water/ Land etc.)	Approximate amount of pollutant release	
Potential Risks of Pollution			
Immediate actions taken			

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External Notification: Yes No (Check Internal Notification Guideline)

Notification to be done by:

EPA Council SafeWork NSW Ministry of Health Fire & Rescue NSW

Notification to Neighbour:

- Face to face contact or telephone call
- Letterbox drops
- Publication of updates on Jalco's Website
- Emailing of updates
- Doorknocking

PIRMP Section Tested and Findings

Section	Finding
Notification of incident	
Inventory of Pollutants	
Safety Equipment on Site	
Control Measures to minimise the risk of pollution	
Actions taken during and immediately after an incident	
Staff Training	
General Comments including improvement required on response, PIRMP document update etc.	

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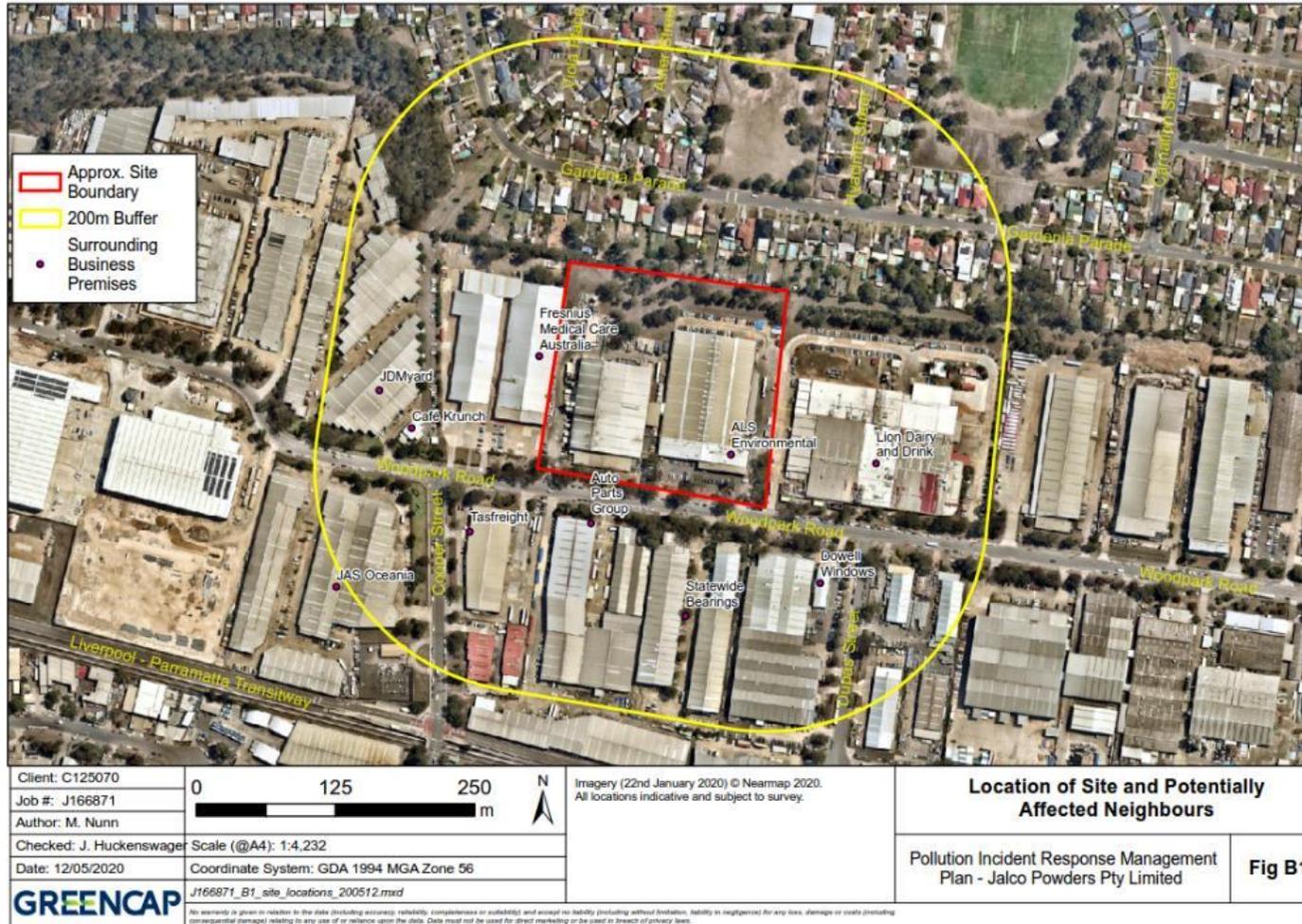
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Appendix B: PIRMP Testing Details

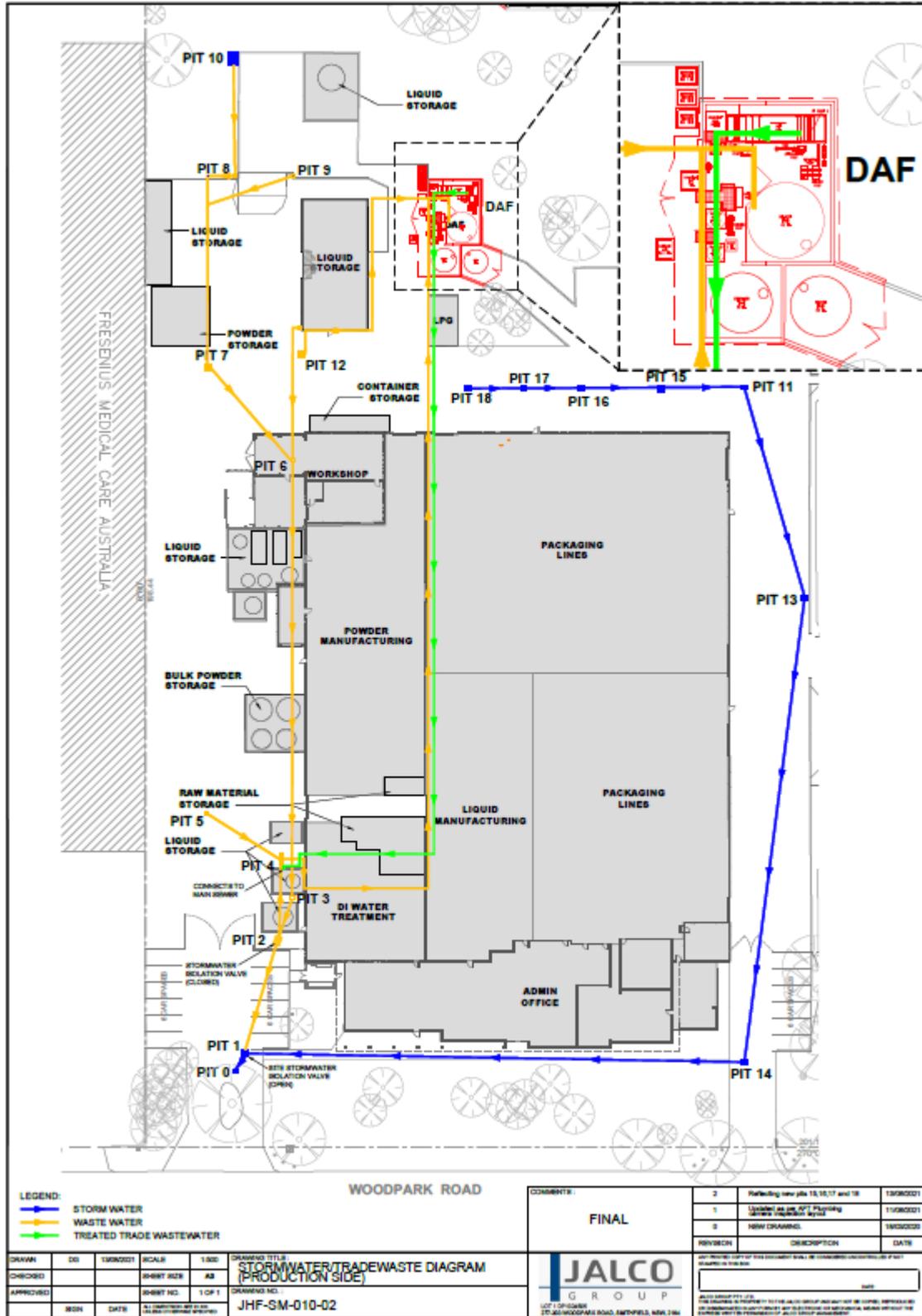
Date tested	Tested by (include names of all involved)	Details of Test	Finding of test	Next scheduled testing date
07/08/20	Shane Roberts, Dean Fisher, Chris Harvey, Avishek Biswas, Zahra Khan	Notification, Immediate controls	Training for production workers to be done	06/08/21
12/08/21	Shane Roberts, Dean Fisher, Chris Harvey, Vedant Patel, Christine Kazzi	Notification, Immediate controls	Refresher training for all site personnel. Confirm pollution Incident poster is displayed and additional pocket cards available.	09/08/22
18/08/22	Dean Fisher, AJ Afualo, Paul Holland, Christine Kazzi	Notification, Immediate controls	Provide incident pocket cards to new employees, share EPL license and PIRMP. Display EPL in notice area. Organise spill response training with external provider and establish team	15/08/23
28/11/2023	Shane Roberts, Dean Afualo, Naushad Ali, Joytika Devi, Gaynor Daniels	Notification, Immediate controls	Refresher training of responsibilities to report and pocket cards.	16/08/24

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Appendix B: Site Maps



Appendix C: Stormwater Network and Pit Locations



Appendix D Manifest Site Plan (Production)

