



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENSEE:

JALCO Australia PTY. LTD.

PREMISES:

JALCO Australia

6 Ash ROAD, Prestons, NSW 2170

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1. Introduction

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN JALCO AUSTRALIA PTY LTD –
 Jalco Australia 6 Ash ROAD, Prestons, NSW 2170

PURPOSE:

Jalco Aust. Pty. holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Jalco Australia. 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 Jalco Australia 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 so 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

- JA-SOP-81 Business Continuity Plan
- Jalco Australia Emergency Procedure
- JA-SOP-83 Stormwater First Flush System
- JA-WI-011 Water Treatment Plant Operation Instruction
- JA-WI-059 Emergency Spill Procedure - Yard
- JA-WI-075 Storm Water Valve Operation
- JA-WI-076 Storm Water Valve Maintenance
- Dangerous Goods & Combustible Liquids Manifest Jalco Australia
- JA-WI-011 Water Treatment Plant Operation Instruction
- JA-WI-074 Attending Site after Spill Rain notification

4. Environment Protection Licence (EPL) Details

Name of licensee:

JALCO AUSTRALIA PTY. LIMITED

EPL number:

20680

Premises name and address:

JALCO AUSTRALIA 6 ASH ROAD PRESTONS, NSW 2170

Company or business contact details:

General Enquiries: 02 9607 2099

Emergency Contact: 1800 242 176

Website address:

Jalco.com.au

Scheduled activity/activities on EPL:

Chemical Production

Chemical Storage

Fee based activity/activities on EPL:

Chemical production waste generation > 100T Annual Volume of Waste Generated or Stored

Chemical storage waste generation > 5 – 100T Annual Volume of Waste Generated or Stored

5. Pollution Incident – Persons Responsible

Managing response to pollution incident

Name: Pat Omprakash

Position or Title: Production Manager

Business hours contact number: 0425 305 863

After hours contact number: 0425 305 863

Email: Pat.Omprakash@pactgroup.com

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Pollution Incident and Control Coordinators

Name: Elijah Batu

Position or Title: HSE Advisor

Business hours contact number: 0448 648 019

After hours contact number: 0448 648 019

Email: Elijah.Batu@pactgroup.com

Name: Ikram Ansari

Position or Title: Engineering Manager

Business hours contact number: 02 8784 4911

After hours contact number: 0406 384 764

Email: Ikram.Ansari@pactgroup.com

Name: Rod Etcell

Position or Title: Maintenance Manager

Business hours contact number: 0404 818 731

After hours contact number: 0404 818 731

Email: Rod.Etcell@pactgroup.com

Name: Elmer Diuco

Position or Title: Operations Manager

Business hours contact number: 0427 730 306

After hours contact number: 0427 730 306

Email: elmer.diuco@pactgroup.com

Name: Parveen Rattan

Position or Title: QA Manager

Business hours contact number: 02 8889 4739

After hours contact number: 02 8889 4739

Email: Parveen.Rattan@pactgroup.com

General Complaints Phone Number: 02 8784 4920

Notifying relevant authorities

Name: Michael Beaton

Position or Title: General Manager – Manufacturing Operations

Business hours contact number: 02 8784 4950

After hours contact number: 0418 456 418

Email: Michael.Beaton@pactgroup.com

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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

Liverpool City Council
Business Hours Ph: 1300 362 170

Sydney Water
132 092

7. Notification of Neighbours and the Local Community

Prpic M&M PTY LTD
8 Ash Rd, Prestons NSW 2170
Ph: (02) 9607 8600

Nexus Corp International Pty Ltd
8/2 Ash Rd, Prestons NSW 2170
Ph: (02) 8798 1894

Mins Party Hire
1/10 Ash Rd, Prestons NSW 2170
Ph: (02) 9607 0472

Furniture Innovators PTY LTD
8/10 Ash Rd, Prestons NSW 2170
Ph: (02) 8783 5444

Sydney Galvanizing
2/12 Ash Rd, Prestons NSW 2170
Ph: (02) 9607 2880

Euro Truck Spares

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2/4 Ash Rd, Prestons NSW 2170
 Ph: (02) 9825 0800

BodyShop News International Pty. Ltd
 Unit 10/2 Ash Rd, Prestons NSW 2170
 Ph: (02) 9826 7777

No Limits Fitness Academy
 12/2 Ash Rd, Prestons NSW 2170
 Ph: (02) 8712 0279

Nexus Corp International Pty Ltd
 8/2 Ash Rd, Prestons NSW 2170
 Ph: (02) 8798 1894

Fit Clinic
 15/2 Ash Rd, Prestons NSW 2170
 Ph: 1300 397 497

GSP Print Pty Ltd
 19 Ash Rd, Prestons NSW 2170
 Ph: (02) 8784 5111

Spicia (Time Spices Pty Ltd)
 25 Ash Rd, Prestons NSW 2170
 Ph: 0432 858 755

Residences on Lyn Parade Prestons

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.

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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 on the grass area that is immediately in front of the main office entrance 6 Ash Road, Prestons.

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 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', immediately after becoming aware of the incident, under the legislative duty to notify:
 - EPA Ph: 131 555
 - Liverpool City Council Ph: 1300 362 170 (Business Hours)
 - NSW Ministry of Health Ph: 02 9828 3000
 - SafeWork NSW Ph: 13 10 50
 - NSW Fire and Rescue Ph: 000 - Emergency
 - Sydney Water Ph: 132 090

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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.

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:
 - JA-WI-059 Emergency Spill Procedure - Yard

10. Emergency Evacuation Procedure

1.1 The Jalco emergency evacuation Assembly Point is located on the grass area that is immediately in front of the main office entrance and next to Ash Road, Prestons and is identified with an ‘Assembly Point’ sign. In the event of an evacuation Jalco Australia Emergency Procedure should be followed.

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 the main vehicle driveway on the right-hand side of the building.

The Site Manifest is updated by the site annually or when required by legislation. Most of these Dangerous Goods are stored in the Class 8 Corrosive Acid, Alkali bund, Class 3 flammable liquid bund, Ethanol storage tank right hand side of main truck loading/unloading area & Class 3 flammable liquid

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containers at the rear of the property. In the event of a chemical spill on the hardstand, the spill is directed toward the Stormwater First Flush System.

All surface water or chemical run-off from delivery trucks in this zone is also directed to Stormwater First Flush System. 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 Water Treatment Plant Operation Instruction).

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.

BULK STORAGE TANKS

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
1 Refuelling Compressor		ABOVE GROUND TANK		2.1		808L	
UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or Common Name	Haz Chem Code	Typical Quantity	Unit, e.g. L. kg. m ³
1971	METHANE, COMPRESSED	2.1	II	METHANE		800	L
1170	ETHANOL (ETHYL ALCOHOL)	3	II	ETHANOL	2YE	55,000	L

PACKAGED STORAGE LOCATIONS

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
2 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. m ³
1170	ETHANOL (ETHYL ALCOHOL)	3	II	ETHANOL	2YE	1500	L
2924	FLAMMABLE LIQUID, CORROSIVE, N.O.S.	3	III	Armohib 18	3W	400	L
1219	ISOPROPANOL (ISOPROPYL ALCOHOL)	3	II	ISOPROPANOL (ISOPROPYL ALCOHOL)	2YE	1500	L

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
3 JAD 3 / BUNDC		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. m ³
2586	ARYLSULFONIC ACIDS, LIQUID	8	III	GARDILENE SSAS	2X	17,500	L
3265	CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S	8	III	MICROCARE IT/ KATHON CG / ACTICIDE RS	2X	200	L

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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	3000	L

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
4 JAD 2B / BUNDF		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. m ³
1791	HYPOCHLORITE SOLUTION	8	III	SODIUM HYPOCHLORITE	2X	7000	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	
5 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. m ³
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	
6 CLASS 3.1 MANUFACTURING (WIP) (AROMATICS MANUFACTURING)		PROCESS BLENDING		3.1		4000L	
UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or Common Name	Haz Chem Code	Typical Quantity	Unit, e.g. L. kg. m ³

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N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
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Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
7 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. m ³
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

DANGEROUS GOODS LOADED ONTO VEHICLES

Identifier		Type of Store Location		Store Location Class		Maximum Storage Capacity	
8 DISPATCH		ROOFLESS PACKAGED STORE		Temporary Storage		4000L	
UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or Common Name	Haz Chem Code	Typical Quantity	Unit, e.g. L. kg. m ³
2693	BISULFITES, AQUEOUS SOLUTION, N.O.S.	8	III	CLAX CID 6BL1	2X	4000	L
2693	BISULFITES, AQUEOUS SOLUTION, N.O.S.	8	III	CLAX CID 6BL1	2X	4000	L
3264	CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S.	8	III	DIVOSHEEN NO 5	2X	4000	L
3264	CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S.	8	III	DIVOSHEEN NO 5	2X	4000	L
3264	CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S.	8	III	DIVOSHEEN NO 5	2X	4000	L
1805	PHOSPHORIC ACID, SOLUTION	8	III	HR ACID	2R	4000	L
1805	PHOSPHORIC ACID, SOLUTION	8	III	HR ACID	2R	4000	L
1805	PHOSPHORIC ACID, SOLUTION	8	III	BRUSPRAY ACID	2R	4000	L
1805	PHOSPHORIC ACID, SOLUTION	8	III	DIVERFOAM PROKLEEN	2R	4000	L
1805	PHOSPHORIC ACID, SOLUTION	8	III	DIVERFOAM PROKLEEN	2R	4000	L

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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 20680 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 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 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.
	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.

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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
	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 is identified on the Manifest Site Plan 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.</p> <p>The Ethanol tank, Class 8 Corrosive Acid/Alkali bund, Class 3 Flammable liquid bund on the right-hand side of the vehicle loading/unloading & Class 3 Flammable liquid containers at the rear of the site contain spills or leaks. 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 Stormwater First Flush system.</p> <p>Chemicals are received and/or decanted based on the current procedures in place.</p> <p>A number of employees and members of the maintenance team have been trained to handle spill clean up</p>

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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 collected	Solid wastes from manufacturing and production are collected daily as per agreement with the licensed waste collector.

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.

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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 waste treatment operator who monitors the Sludge Holding Tank capacity.
	Possible breach to Sydney Water Agreement	Possible (3)	Moderate (3)	High Risk (B)	<p>Too much surfactant, or any other substances that disrupt chemical and biological balance in the wastewater treatment plant</p> <p>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</p>	<p>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 Tanker by licensed contractor. This prevents any possible overflow of wastewater entering other areas of the site or offsite.</p> <p>Separation of stormwater and wastewater is being considered as part of overall wastewater and stormwater management.</p>

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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 Trade Waste 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).

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

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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 Trade Waste 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

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, Ethanol tank, Class 8 Corrosive Acid/Alkali Class 3 Flammable liquid bunds on the right hand side of the vehicle loading/unloading & Class 3 Flammable liquid containers at the rear of the site contain spills or leaks. Any spill that occurs can be captured and contained within the site. All runoff in this area is diverted to the Stormwater First Flush system.</p> <p>Any liquid chemical spills are collected into IBC's for removal by licenced contractor.</p>

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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
	Release of chemicals to Trade Waste Plant	Unlikely (2)	Low (2)	Moderate Risk (C)	Uncontrolled spill or leaking Storage Tanks	<p>All storage tanks, Ethanol tank, Class 8 Corrosive Acid/Alkali Class 3 Flammable liquid bunds on the right hand side of the vehicle loading/unloading & Class 3 Flammable liquid containers at the rear of the site contain spills or leaks. Any spill that occurs can be captured and contained within the site. All runoff in this area is diverted to the Stormwater First Flush system</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.

23. Risk – Potential Failure of Stormwater Drainage

23.1 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 Stormwater Drainage	Release of potentially harmful environmental substances to storm water	Unlikely (2)	Low (2)	Moderate Risk (C)	Failure of site stormwater isolation valve in Pit Failure to test quality of water to be discharged. Torrential Rainfall	<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. Use of temporary IBC's and Road Tanker in case of torrential rain that could flood the site, which is closely monitored by the Trade Waste Operator and QA/QC Manager/Supervisor. 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 Engineering Manager, Production Manager and Operations Manager</p>

23.2 Control Equipment and Management Process

Identified Hazard	Description of Safety Equipment and Management Processes
Potential Failure of Stormwater Drainage	There is one storm water discharge systems on site. The Storm Water Pit located at the Main Gate Driveway on the righthand side. This gate valve is monitored, maintained and operated Jalco Staff. Flow of storm water through the facility is controlled via a network of drains and pits and goes through the site Stormwater First Flush system

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Identified Hazard	Description of Safety Equipment and Management Processes
	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.

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.

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)	Traffic in rear yard after hours	Preclude work in the truck loading/unloading area is between 7am 5pm Monday to Friday and when required from 7am Saturday until 5pm. This includes: <ul style="list-style-type: none"> • Forklift operation • Receiving of trucks • Bin or container movements

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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
	Community complaints	Possible	Moderate	High	Same as above	Same as above

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 truck loading/unloading area is between 7am to 5pm Monday to Friday and when required on Saturday from 7am until 5pm. This includes: 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.

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 to collect waste based on agreed frequency with the licensed waste collector	Sludge and other liquid wastes are collected as per agreement with the licensed waste collector.

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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.

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.

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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> <i>Inadequate cleaning & waste disposal</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). - Tank lids remain closed unless in use. - Damaged/leaking containers removed and disposed of in enclosed container. - 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 Trade Waste Plant, or stored in closed containers until treatment. - Solid waste sealed & stored in enclosed container until disposed offsite.

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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>Inadequate spill management</i> <i>Inadequate Monitoring</i> (ii) WASTEWATER <i>Failure of wastewater control systems</i>	Management of fragrance spill - 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 Inspection and monitoring - Monthly inspection of external drainage system points for visible external blockages.
	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

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27. Document Control Register

DATE	VERSION	PREPARED/CHANGED BY	DETAILS OF REVISION
17.03.10	New	A. Redman	New Document
20.01.09	1	A. Redman	Emergency Contacts updated 2009 Dangerous Goods
17.03.10	2	A. Redman	Dangerous Goods quantities & materials Reviewed. Manifest updated based on review information.
19.01.11	3	J. Matienzo	Dangerous Goods quantities & materials Reviewed. Manifest updated based on review information.
15.08.12	4	J. Matienzo	Dangerous Goods quantities & materials Reviewed. Manifest updated based on review information.
01/12/13	5	J. Matienzo	Dangerous Goods quantities & materials Reviewed. Manifest updated based on review information.
07/08/2015	6	N. Singh	Dangerous Goods quantities & materials Reviewed. Manifest updated based on review information.
14/09/2020	7	G. Galloway	Dangerous Goods quantities & materials Reviewed. Manifest updated based on review information.
19/01/2021	8	G. Galloway	Updated in line with the standard of the EPA NSW Guidelines
07/02/2022	9	E.Batu & C.Kazzi	3. Jalco reference document; removed version number 4. EPL Details; updated fee based and scheduled activity as per license 5. Pollution Incident – Person Responsible; updated contact personnel 26.1 “Inspection and monitoring” removed odour inspection
20/01/2023	10	E. Batu	Dangerous Goods quantities & materials Reviewed. Manifest updated based on review information.

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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			
Member			
Member			
Member			
Member			
Member			
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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Appendix B: PIRMP Testing Details

Date tested	Tested by (include names of all involved)	Details of Test	Finding of test	Next scheduled testing date
02/10/2020	Pat Omprakash, Gordon Galloway, Ikram Ansari, Tim Goldring	Spill of 1054 kg IBC of A/All wash & wax	Response tested PIRMP & First Flush System no issues identified	Oct 2021
07/02/2022	Pat Omprakash, Elijah Batu, Christine Kazzi, Ikram Ansari	Spill of 900 kg IBC of Strawberry Cutie	Response tested PIRMP & First Flush System no issues identified	Feb 2023
12/01/2023	Pat Omprakash, Elijah Batu, Ikram Ansari		Response tested PIRMP & First Flush System no issues identified	Jan 2023

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Appendix C: Site Maps

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Appendix D Manifest/SDS, Bulk DG's, Stormwater shut valve & First Flush Site Plan

