POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

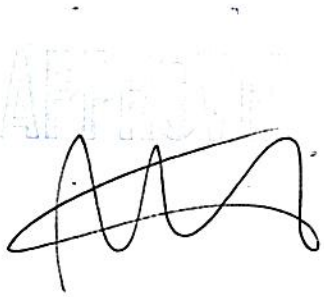
LICENSEE:

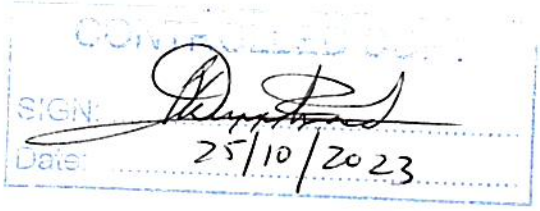
JALCO COSMETICS PTY. LTD.

PREMISES:

JALCO COSMETICS

45 KING ROAD, HORNSBY, NSW 2077





I. BACKGROUND

The Protection of the Environment Legislation Amendment Act 2011 was assented to on 16 November 2011 which the new requirements for the management and notification of pollution incidents by all Environmental Protection Agency (EPA) License holders.

These new requirements involve the occupier of the premises, the employer or any person carrying on the activity on which a pollution incident occurs to *immediately* notify each of the relevant authorities when material harm to the environment is caused or threatened.

II. PURPOSE

The purpose of the plan is to define the actions to be taken to prepare, keep, test and implement a pollution incident response management plan for Jalco Cosmetics Pty. Ltd as defined in the Protection of the Environment Legislation Amendment Act 2011.

This plan provides guidelines for:

- Preparing the Pollution Incident Response Management Plan (PIRMP)
- Keeping the PIRMP at the Premises
- Testing the PIRMP in accordance with the regulations
- Implementing the PRIMP in case of an incident

III. SCOPE

This plan applies only to Jalco Cosmetics Pty Ltd, known as the *Licensee* of EPA License Number 2848. The premises is known as *Jalco Cosmetics* and located at 45 King Road, Hornsby 2077.

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

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

IV. RELATED DOCUMENTATION

JCP 011 Disaster Recovery Procedure
PACT WHSR PRO 006 Incident Reporting and Investigation Procedure

VI. FACILITY INFORMATION

A. Jalco Cosmetics Pty. Ltd.

LICENSE NUMBER	2848
LICENSEE	JALCO COSMETICS PTY. LIMITED
LICENSE TYPE	PREMISES
PREMISES	JALCO COSMETICS 45 KING ROAD HORNSBY, NSW 2077
SCHEDULED ACTIVITY	CHEMICAL STORAGE
FEE BASED ACTIVITY	CHEMICAL STORAGE WASTE GENERATION
REGION	METROPOLITAN Metropolitan - Sydney Industry Level 13, 10 Valentine Ave PARRAMATTA NSW 2150 Phone (02) 9995 5000 Fax (02) 9995 6900 PO Box 668 PARRAMATTA NSW 2124

The Pollution Incident and Control Coordinators are responsible for on-site pollution prevention and control. The Pollution Incident and Control Coordinator team is also responsible for reporting immediate notifications of releases to the environment.

Pollution Incident and Control Coordinators:

Any of the persons listed below are authorized to activate the PIRMP when required. All the persons listed below are also trained and authorized to co-ordinate and execute the PIRMP if a pollution incident occurs.

Peter Dimitriadis*
Quality and Microbiology manager
Working Hours Phone Number: *02 9472 6117*
After Hours Phone Number: *0409 151 959*

Paul Holland*
Site Manager
All hours mobile number *0478 050 034*

Mark C McMillan*
Maintenance/ Eng Manager
All hours mobile number *0400 887 546*

Sean Barrett
Manufacturing supervisor
Working Hours Phone Number: *02 9472 6149*
After Hours Phone Number: *0423 248 412*

Mika Lu*
Personal Care Business Manager
All Hours Phone Number *0437 670 742*

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

VII. DEFINITIONS

What is a pollution incident?

'*Pollution incident* means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.'

When does notification need to be given of a pollution incident?

Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm is defined in section 147 of the POEO Act as:
'(a) harm to the environment is material if:
(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and
(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.'
Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2).
Section 148 of the POEO Act sets out additional pollution incident notification requirements.

VIII. PREVENTION OF POLLUTION INCIDENTS

Prevention of pollution incidents can be done through the control of human, machine or equipment performance and physical environment. As such, policies and procedures have been established to protect human health and the environment.

To minimize or prevent the probability of pollution incident occurring, annual testing of the plan in the form of a Mock Pollution Incident shall be conducted by the relevant site managers.

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

- Spill kits, currently 6 on-site, each handle 240L general chemical spills. They are inspected by the supplier every 3 months.
- Drain seals, currently 2 available, they seal the stormwater drains to prevent further pollution from entering the drains. They are inspected by the supplier every 3 months.
- Drain stop in position 17 in Appendix 1. This acts as a primary pollution control measure, once activated, pollution will be contained within the site. The mechanism is tested annually.
- A spill pump is then employed to pump the spill into containers for responsible disposal.

The above is to ensure that in the event of a pollution incident; the site is capable of reporting, managing and communicating the incident to appropriate regulatory authority.

IX. ESTABLISHING POLLUTION INCIDENT MANAGEMENT TEAM

Depending on the type and size of the pollution incident, a Pollution Incident Management Team shall be established to perform and coordinate the management and communication of the incident.

The Pollution Incident Management Team shall be led and coordinated by the site General Manager or Delegate and the Site Emergency Coordinator or Deputy Coordinator.

Additional resources are to be determined based on the type of incident and may include the following:

- Company Directors
- Group Human Resources Manager
- Group Employee and Industrial Relations Manager
- OH&S Committee Chairman and/or Member
- Site Business Unit Manager
- Technical Manager
- Site or Group Engineer
- Quality Manager
- Maintenance Manager

- Finance Director

X. DETAILS OF PRESENT SITE

Jalco Cosmetics Pty Ltd is the group's main site for the manufacture of cosmetic products. A small part of this business is focused on the manufacture of sunscreen and medical device products. Manufacturing activities on site include receipt of raw materials and packaging, dispensing, compounding, testing, packing and storage of goods prior to dispatch to customers.

Manufacturing site - 45 King Road, Hornsby, 2077 N. S.W. The plant is located on 1 hectares of land, approximately one quarter of which is developed. Adjacent development is light industrial and residential.

45 King Road, Hornsby - 4800 square metre plant and office.

Majority built 1950 with extension in mid 1980's.

Extensive internal renovations 1994 - 1997.

Relocation of Lab area 2002

The site is primarily a Cosmetic and Therapeutic Products manufacturing plant, within which licensable products are manufactured.

XI. DESCRIPTION AND LIKELIHOOD OF HAZARDS

1. Storage of Chemicals

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

Dangerous Goods register is maintained and updated by the site annually. There are ten (10) Dangerous Goods Depots on site and these are stored in the following locations (Table 1):

Table 1: List of Dangerous Goods

Depot	Correct Shipping Name	Type of Store Location	Class	Bunded Storage? (Y or N)
1	PRINT INK RELATED MATERIAL ETHYL METHYL KETONE (METHYL ETHYL KETONE)	ROOFED STORE	3	Y
2	TERPENE HYDROCARBONS, N.O.S. ETHANOL (ETHYL ALCOHOL) RESIN SOLUTION flammable	ROOFED STORE	3	Y
3	NOT IN USE	ROOFLESS STORE	N/A	Y
4A	THIOGLYCOLIC ACID CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S.	ENCLOSED ROOFLESS STORE	8	Y
4B	CORROSIVE LIQUID, BASIC, ORGANIC, N.O.S. SODIUM HYDROXIDE SOLUTION	ROOFED STORE	8	Y
6	NOT IN USE	SEPARATION PLANT	N/A	Y
7	PETROLEUM GASES, LIQUIFIED	CYLINDER STORE	2.1	Y
8	ACETYLENE, DISSOLVED	CYLINDER STORE	2.1	Y
9	HYDROGEN PEROXIDE, AQUEOUS SOLUTION with not less than 20% but not more than 60% hydrogen peroxide (stabilized as necessary)	ENCLOSED ROOFLESS STORE	5.1	Y
10	VARIOUS FRAGRANCES AND SURFACTANTS	WAREHOUSE	9	Y

2. Storage of Solid Waste

Sources of the site's solid wastes are empty raw material containers (drums, pails, etc), plastic and kraft bags, packaging cardboards, and damaged packaging materials from production.

Shippers and cardboard liners used for packaging materials are collected and returned to the suppliers.

Solid wastes from manufacturing and production are collected daily by Veolia Environmental Services P/L.

3. Storage of Waste Water and Other Liquid Wastes

The Separation Plant is protected by bund to contain leaks, spills or overflows. The plant has a roof over to prevent accumulation of water in the bund.

Semi-dry sludge is removed as per the site's requirements by Solveco Pty Ltd.

Rejected liquid bulk products are collected and disposed of accordingly by the above-mentioned licensed trade waste collectors and Cleanway Environmental Services P/L.

Other waste management companies used are listed in : *JC-MR-010 SITE WASTE INVENTORY REGISTRY*

4. Potentially Offensive Odour

No condition of the licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.

Section 129 of the Protection of the Environment Operations Act 1997, provides that the site must not cause or permit emission of any offensive odour from the premises but provides a defence of the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimizing odour.

5. Potential Failure to Meet Noise Limits

Noise from the premises must not exceed:

A. An LA10 (15 minute) noise emission criterion of 70dB(A) from 0700H to 2200H seven days a week

and

B. An LA10 (15 minute) noise emission criterion of 65dB(A) at all times, except as expressly provided by the EPA licence.

Noise from the premises is to be measured or computed at any point within one metre of the premises boundary to determine compliance with condition set at **A**. 5dB(A) must be added if the noise is tonal or impulsive in character.

There is no current requirement set by EPA as to the frequency to conduct noise monitoring. Noise monitoring shall be conducted when there is a warrant to have it done such as valid noise complaint from surrounding neighbours.

XII. RISK ASSESSMENT PROCESS

This risk matrix is based on Jalco Group's Risk Management Guidelines Document Number RMP-03-03 issued on 27/10/12.

Consequence of Risk

Level	Description	Example details description
1	Insignificant	No injuries, low financial loses
2	Minor	First aid treatment, on-site release contained, medium financial loss
3	Moderate	Medical treatment required, on-site release contained without side assistance
4	Major	Extensive injuries, loss of production capability, off-site release with no detrimental effect, major financial loss.
5	Catastrophic	Death, toxic release off-site with detrimental effect, huge financial loss

Table 2: Likelihood of Risk

Level	Description	Example details description
A	Almost certain	Is expected to occur in most circumstances
B	Likely	Will probably occur in most circumstances
C	Possible	Might occur at some time
D	Unlikely	Could occur at some time
E	Rare	May occur only in exceptional circumstance

Table 3: Risk Analysis Matrix – (Level of Risk)

Likelihood	Consequence				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A (almost certain)	H	H	E	E	E
B (likely)	M	H	H	E	E
C (possible)	L	M	H	E	E
D (unlikely)	L	L	M	H	E
E (rare)	L	L	M	H	H

Table 4: Action Required

E: Extreme risk (Senior Management action required) Isolate immediately and Rectify within 2 weeks	Significant
H: High risk (Senior management action required) Isolate immediately and rectify within 2 weeks	Significant
M: Moderate risk (Management responsibility must be specified) Rectify within a reasonable time frame. An action plan is required for any risks which will not be rectified within 4 weeks which indicates how the risk will be managed and rectified	Not Significant
L: Low risk; (manage by routine procedure)	Not Significant

Table 5: Risk Rating of Site Hazards

Identified Hazard	Likelihood	Consequence	Level of Risk	Associated Risk/s	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Storage of Chemicals	Unlikely	Moderate	Moderate Risk	• Toxic Effects of Chemicals to Human Health • Flammability of Chemicals • Chemicals may enter water drains after spill • Corrosive Effects of Chemicals	• Chemical spill during receipting or transfer of chemicals • Flammable chemicals not stored in the designated flammable depot • Corrosive chemicals not stored in the designated corrosive depot	• Procedures on the receipting and decanting of chemicals are in place. • In case of spill, SDS are available for the appropriate handling. Spill kits, drain seal and drain stop are in place to handle spills. Pump dedicated for spill collection. • Dangerous goods are kept at the designated depot. Incoming Goods Receiver checks delivery invoice and identify which depot the goods will be stored.
Storage of Solid Waste	Rare	Insignificant	Low Risk	• Disposal of Waste • Congested work and storage areas	• Failure to collect waste based on agreed frequency with the licensed waste collected	• Solid wastes from manufacturing and production are collected daily as per agreement with the licensed waste collector.

Identified Hazard	Likelihood	Consequence	Level of Risk	Associated Risk/s	Details of Conditions That Could/Would Increase Likelihood of Hazard	Pre-emptive Actions Required or In Place
Storage of Waste Water and other Liquid Waste	Possible	Minor	Moderate Risk	Disposal of Waste	Failure to collect waste based on agreed frequency with the licensed waste collected	Sludge and other liquid wastes are collected as per agreement with the licensed waste collector. Spill-kits, drain seal and drain stop are in place to handle spills. Waste-water plant located inside a bunded area.
Potentially Offensive Odour	Unlikely	Minor	Low Risk	Disposal of Waste	Failure to collect waste based on agreed frequency with the licensed waste collected	Sludge and other liquid wastes are collected as per agreement with the licensed waste collector.
Failure to Meet Noise Limits	Unlikely	Minor	Low Risk	Noise exceeding set out in the site's EPA Licence	Worn out rotary valves of Powders Plant Blow down of Compressor	Preventive Maintenance of Rotary Valves Reporting System where Operators are to call attention of Fitters for unusual noise in the powders plant Blow down is done between 0700H to 2200H and is less than 15 minutes to complete.

XIII. Inventory of Potential Pollutants on Site

Table 6 is the inventory of potential pollutants on site and the maximum quantity stored on site.

Table 6: Inventory of Potential Pollutants

The site obtains and maintains a JC-MR-016 DANGEROUS AND HAZARDOUS GOODS MANIFEST REGISTER

Potential Pollutant	Product or Common Name	Class	Division	Maximum Quantity	Unit
PRINT INK RELATED MATERIAL	PRINT SOLVENT PRINT INK	3	FLAMMABLE LIQUIDS	300	L
TERPENE HYDROCARBONS, N.O.S.	D-Limonene LIME OIL	3	FLAMMABLE LIQUIDS	100	L
ETHANOL (ETHYL ALCOHOL)	ETHANOL	3	FLAMMABLE LIQUIDS	2,600	L
RESIN SOLUTION flammable	ISP PVP/VA E-735 Luviskol Plus Dynamx Aquaflex FX64	3	FLAMMABLE LIQUIDS	1,500	L
FLAMMABLE LIQUID, N.O.S (Contains octamethylcyclotetrasiloxane)	DOW CORNING 344 FLUID	3	FLAMMABLE LIQUIDS	600	L
CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (contains glycolic acid)	GLYCOLLIC ACID 70%	8	CORROSIVE SUBSTANCES	100	L
CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (contains isothiazolin 5-chloro-2-methyl-4-isothiazolin-3-one 2-methyl-4-isothiazolin-3-one)	MICROCARE IT	8	CORROSIVE SUBSTANCES	100	L
CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S.	THIOGLYCOLLIC ACID 80%	8	CORROSIVE SUBSTANCES	30	L
CORROSIVE LIQUID, BASIC, ORGANIC, N.O.S.	LAURYL PYRROLIDONE DISSOLVINE D40	8	CORROSIVE SUBSTANCES	300	L
CORROSIVE LIQUID, TOXIC, N.O.S.	POTASSIUM HYDROXIDE SODIUM HYDROXIDE	8	CORROSIVE SUBSTANCES	1,900	L
CORROSIVE LIQUID, TOXIC, N.O.S. (contains 5-chloro-2-methyl-4-isothiazolin-3-one)	KATHON CG	8	CORROSIVE SUBSTANCES	30	L

Potential Pollutant	Product or Common Name	Class	Division	Maximum Quantity	Unit
PETROLEUM GASES, LIQUIFIED	LPG	2.1	FLAMMABLE GAS	200	L
ACETYLENE, DISSOLVED	ACETYLENE	2.1	FLAMMABLE GAS	600	L
HYDROGEN PEROXIDE, AQUEOUS SOLUTION with not less than 20% but not more than 60% hydrogen peroxide (stabilized as necessary)	HYDROGEN PEROXIDE	5.1	FLAMMABLE GAS	400	L
VARIOUS FRAGRANCES AND SURFACTANT	VARIOUS FRAGRANCES AND SURFACTANT	9	MISCELLANEOUS	2000	L

XIV. DESCRIPTION OF SAFETY MEASURES TO MINIMISE RISKS TO HUMAN HEALTH OR ENVIRONMENT

Table 7: Description of Safety Measures

Identified Hazard	Description of Safety Measures
Storage of Chemicals	All dangerous goods are stored in the designated depots as illustrated on Dangerous Goods Depot Plan (Drawing 1). Chemicals are received and/or decanted based on the current procedures in place. In case of chemical spill, the site has spill kits, drain seal and drain stop are in place to handle spills. When drain stop is activated, stormwater needs to be assessed before releasing. Incident management team is responsible for perform necessary assessment, determine the suitability of releasing stormwater back to waterway and record keeping. If stormwater is not deemed to be suitable for releasing, further treatment will be required. Dedicated pump for spills is available to pump spill or contaminated stormwater into IBC's if required to be collected and disposed responsibly by licensed contractor.
Storage of Solid Waste	Solid wastes are stored in skip bins provided by the licensed waste collector and are collected as per prescribed frequency.
Storage of Waste Water and other Liquid Waste	Waste water from manufacturing is diverted to the separation plant for treatment. As required by regulatory bodies, waste water is treated to meet the trade waste parameters before it is released to sewer. Composite and Discrete Samples are collected at a prescribed frequency by Sydney Water and tested by a NATA certified third party laboratory. Waste-water plant and waste water collection tank are located inside a bunded area. Sludge and other liquid wastes like rejected bulk (work-in-progress) are collected by licensed sludge collectors. These wastes are collected upon the site's request.
Potential Offensive Odour	Sludge and other liquid wastes like rejected bulk (work-in-progress) are collected by licensed sludge collectors. These wastes are collected upon the site's request.
Potential Failure to Meet Noise Limits	There is no current requirement set by EPA as to the frequency to conduct noise monitoring. Noise monitoring shall be conducted when there is a warrant to have it done such as valid noise complaint from surrounding neighbours.

SAFETY EQUIPMENT

The following control measures and safety equipment are in place to contain chemical spills and minimise the impact to environment:

- Spill kits, currently 6 on-site, each handle 240L general chemical spills. They are inspected by the supplier every 3 months.
- Drain seals, currently 2 available, they seal the stormwater drains to prevent further pollution from entering the drains. They are inspected by the supplier every 3 months.
- Drain stop in position 17 in Appendix 1. This acts as a primary pollution control measure, once activated, pollution will be contained within the site. The mechanism is tested annually.
- A spill pump has been made available and is stored in the spill kit station adjacent to the main storm water drain. In case of a spill incident, the main storm water drain is shut and the pump is deployed to pump the spill into IBCs.
- Additionally, various Personal Protective equipment is available on site at all times and these include gloves (for various applications), respirators, safety glasses and protective clothing.

Refer to spill kit and drain location maps in the appendix section at the end of this document.

XV. MINIMISING HARM TO PEOPLE ON THE PREMISES

This site has fitted and installed multiple emergency features and equipment to ensure that injury and damage to the organisation's personnel, plant, equipment, and the immediate and surrounding environment is minimised. These features include:

- Emergency Alert/Evacuation Warning System
- Emergency Alarm Buttons
- Emergency Exits
- Fire Extinguishers
- Fire Hose Reels
- Fire Blankets

- Fire/Smoke Doors, Spill Kits
- Evacuation Assembly Area/s

The site also has in place an Emergency Control Organisation (ECO), a group of employees organised, structured and trained to coordinate the site response and possible evacuation in the case of an emergency as well as communicate with emergency services.

In an extreme situation, the site personnel may need to be evacuated to a safe assembly area. In this case, the PIRMP coordinators will execute the emergency evacuation plan by activating the evacuation alarm manually. When the evacuation alarm is sounded, the site's Workplace Emergency Response Plan is also activated and will be implemented and controlled by the ECO.

The PIRMP coordinators will continue to manage and coordinate the Pollution Incident while personnel are assembled in the safe areas allocated for this purpose.

XVI. External Contact Phone Number Listing:

EPA	131 555
NSW Ministry of Health	Business Hours: Hornsby Hospital, Palmerston Rd, Hornsby 2077 Ph: 02 9477 9400 Fax: 02 9482 1650 / 1358 (s) After Hours: Ph: 02 9477 9123 (Hornsby Hospital) - ask for Public Health Officer on call
Fire and Rescue NSW	000 - Emergency
NSW Ambulance	000 - Emergency
Work Cover NSW	13 10 50
Hornsby Shire Council	Phone: (02) 9847 6666 (Business Hours) Fax: (02) 9847 6999
NSW Police	000 – Emergency
Sydney Water	13 20 90

XVII. Incident Management Procedure for Communicating with the Community

A. Definitions of Pollution Incident and Material Harm Incident

A pollution incident is defined as an incident or set of circumstances during or as a consequence of which there is likely to be a leak, spill or other escape or deposit of substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

A material harm incident is defined as an incident that is considered to be causing or threatening material harm which involves actual or potential harm to the health and safety of people or to ecosystems as well as results on actual or potential loss or property damage. The determination of a material harm incident will be made by either the General Operations Manager (relevant on duty authority).

B. Communicating with the relevant authorities.

In the case of a material harm incident, prior to any other action, the initial observer must report the issue immediately to their supervisor, WHSE Coordinator or Workplace Manager (relevant on duty authority). The Workplace Manager must notify a member of the Pollution Incident Control Coordinator team. The site must contact 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents. Simultaneously all evacuation procedures should be implemented for all guests and non-essential staff. However, incident notification will be made as soon as it is safe to do so.

After the initial response to any events that may cause immediate harm to human health or property the General Operations Manager (relevant duty authority) in collaboration with the Pollution Incident Control team will determine if the event constitutes an "actual or potential material harm incident". In the event of a "material harm incident" the following authorities need to be contacted as per Section XIII External Contact Phone Number Listing:

- EPA
- Hornsby Shire Council
- NSW Ministry of Health
- Work Cover NSW
- NSW Fire and Rescue
- Sydney Water

In the case of a "material harm incident" the following information must be noted and forwarded to the authorities when they are notified of the incident:

- Time and date.
- Nature and location of the incident.
- Duration of the incident.
- Location of areas that may be affected by the pollution incident.
- Pollutant involved and the estimated quantity/volume and concentration
- Circumstances in which the incident occurred.
- The proposed action to be taken in dealing with the pollutant and any further incidents that may result.

A detailed record should be kept of all steps involved in dealing with each incident and kept on site in case additional information is required. After the initial notification of a material harm incident, it will be the responsibility of the Pollution Incident and Control Coordinators to coordinate with any authority that is contacted.

If the material harm incident does not pose any threat to human health or property, concurrently with contacting emergency services (000), all possible actions should be taken to control the pollution incident and minimize health, safety and environmental consequences. These actions must be employed to the maximum extent possible to:

- Provide for the safety of people at and within the vicinity of the site; and
- Contain the pollution incident.

C. Notification of Adjacent Companies and Neighbours

In the event of a determined material harm incident, community notification will be undertaken by the Pollution Incident and Control Coordinators.

When contacting adjacent companies and neighbours the following notification process is to be used:

- **Warnings**: in the event of an incident same day face to face contact and telephone notification will be employed to update affected landholders
- **Updates**: follow-up telephone calls will be made to all landholders who were notified in the initial warning. Updated information will be provided if and when it becomes available and necessary to be passed on. Updates will be provided to the community as follows:

    1. Face to face contact or telephone call
    2. Letterbox drops
    3. Publication of updates on Jalco's Website
    4. Emailing of updates
    5. Door-knocking

XVIII. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT.

Due to the nature of the activities carried out on site and the topography of the site, the most likely pollution incident to occur would be a Chemical spill. The chemical spill could be from non-hazardous raw materials, hazardous raw materials, bulk products or waste-water. The largest containers/tanks kept on site are IBCs which are limited to 1000kg/litres each. Therefore, the largest spill that can occur on site should be limited to 1 or 2 IBCs, equivalent to 2000 litres of spill. The waste-water plant is located inside a bunded area which will contain the volume of the waste-water tank in case of leak or rupture.

The topography of the site is such, that the ground falls naturally from every corner of the site to a central point which happens to be around the main storm water drain on the North-Eastern area of the property and around 10 metres from the North boundary wall. The ground has a natural fall from the northern boundary wall back to the main storm water drain, thus forming a natural catchment area. Spills cannot flow to any neighbouring property and the only danger would be escape through the main stormwater drain to the watercourse at the bottom of the valley, approximately 400 metres north of the boundary wall. This is the reason why most of the preventive actions on the site are focused on any spill not getting past this main stormwater drain.

a) **Spill**

The most likely pollution incident to occur on site is Chemical Spill whether it may be Raw Material, Bulk product or waste water. The instant a spill is reported, the extend and the risk need to be immediately evaluated. The following procedure must be followed by the initial observant of the incident and subsequently by the Spill Response team and the PIRMP coordinators:

PROCEDURE
Step 1: Communicate the incident to access assistance and clear the area. Immediately let a co-worker or persons working in the vicinity know of the spill so that they can notify the Spill Response Team.
Step 2: Stop the source if possible and Assess the Risk If it is safe to do so, stop the source. This could simply involve turning a container upright or plugging a leak from a damaged drum or container or simply shutting a valve. Determine the risks that may affect human health, the environment and property. Identify and assess the spill by looking for: . WHAT has been spilled (look for a label / sign on the source of the spill).

- HOW MUCH has been spilled?
- WHERE is the spill headed?
- What other DANGERS are there?

Step 3: Prevent the spill from exiting the site via the main stormwater drain outlet.

If the spill is large enough and located within access to stormwater drains, it may end up in the drains and escape out of the site into a water source. The Hornsby site has a stormwater shut valve located in the last main drain at the northern end of the yard near the warehouse main entrance. This shut valve needs to be shut as soon as possible by loosening the rope and letting the guillotine valve drop into the shut position.

The success of this action will determine if the incident remains localised without endangering people or the environment, or whether the incident becomes a Pollution incident with potential to harm others off site as well as the environment.

Step 4: Select Personal Protective Equipment (PPE)

By this time the Spill Response Team should be at the location of the spill with spill kits and appropriate equipment. Members of the Spill Response Team are also members of the Pollution Incident Control coordination team and will be assessing the extent of the incident with regards to potential to cause material harm.

Consult the SDS, if available, to determine the most appropriate PPE to wear. If the danger is uncertain and the material is unknown, the worst should be assumed, and the highest level of protection used.

Step 5: Confine the Spill and re-assess situation

The extent of the spill area should be limited by blocking, diverting or confining the spill. Use a Spill Kit with appropriate absorbent and blocking materials.

The flow of the spill should be stopped before it has a chance to contaminate a water source – minimising the spill area and protecting stormwater drains are the priorities. The main stormwater drain exit should have been shut by now. However, if the spill has entered other branches of the storm water drain, these must be cleared and cleaned before the main valve is re-opened.

At this stage the situation needs to be re-assessed. If the spill has escaped the site, then the PIRMP must be activated and the relevant authorities notified. See section XVII above.

Seek help from your supervisor or other staff if assistance is required.

Step 4: Stop the Source if unable to have done in step 2
This step may happen before the spill is even confined depending on the extent or the size of the spill. This could simply involve turning a container upright or plugging a leak from a damaged drum or container. Once the leak has been stopped the liquids should be transferred from the damaged container to a new one.

Step 5: Evaluate the incident and implement clean-up
Once the spill is confined and the leak has been stopped, it is time to reassess the incident and develop a plan of action for implementing the spill clean-up. Using the absorbent materials from Spill Kits, the spill should be cleaned up. Additional materials such as neutralisers, detergents etc may be needed to completely clean the area. Once the absorbents are saturated, they may be considered hazardous waste and should be disposed of properly.
It may be necessary to employ professional organisations such as Solveco or Cleanway to assist with clean-up

Step 6: Decontaminate
The site, personnel, and equipment should be decontaminated by removing or neutralising the hazardous materials that have accumulated during the spill. This may involve removing and disposing of contaminated media, such as soil, that was exposed during the spill incident. PPE may be able to be reused after inspection and clean-up. An effective decontamination area should also be created to ensure the health and safety of emergency responders.

Step 7: Complete Incident Form
As soon as possible after the spill, an incident reports should be completed and entered onto the Group WHSE Reporting System.

C. Testing of the Plan

The PIRMP will be tested on an annual basis during the life of the EPA licence. Testing will be by way of desktop simulations and/or practical exercises and drills undertaken at the Hornsby site. The PIRMP will also be tested within one month of any pollution incident occurring. Records of testing will be kept on site.

Date Tested	Tested by	Details of Test	Issues identified	Next test
18/01/2023	P. Dimitriadis (Q&E manager) and PIRMP coordinators	Physical spill simulation. Report Jan 2023	QA/QC to be notified of spill kit items usage so they can be replaced	Before end of November 2024

D. Review of PIRMP

The PIRMP will be reviewed every 3 years. The plan will be updated as required based on the current state of the site. Records of PIRMP revisions will be recorded.

E. Staff Training

The objective of staff training is as follows:

- **Individuals** – understand pollution incident procedures, their roles, responsibilities and how to activate these in a pollution incident situation.
- **Multi-Agency Teams** - response teams have detailed understanding of their roles, how to support each other, mobilise, work together to resolve the pollution incident.

Records of staff training will be maintained on site.

DOCUMENT CHANGE CONTROL PAGE

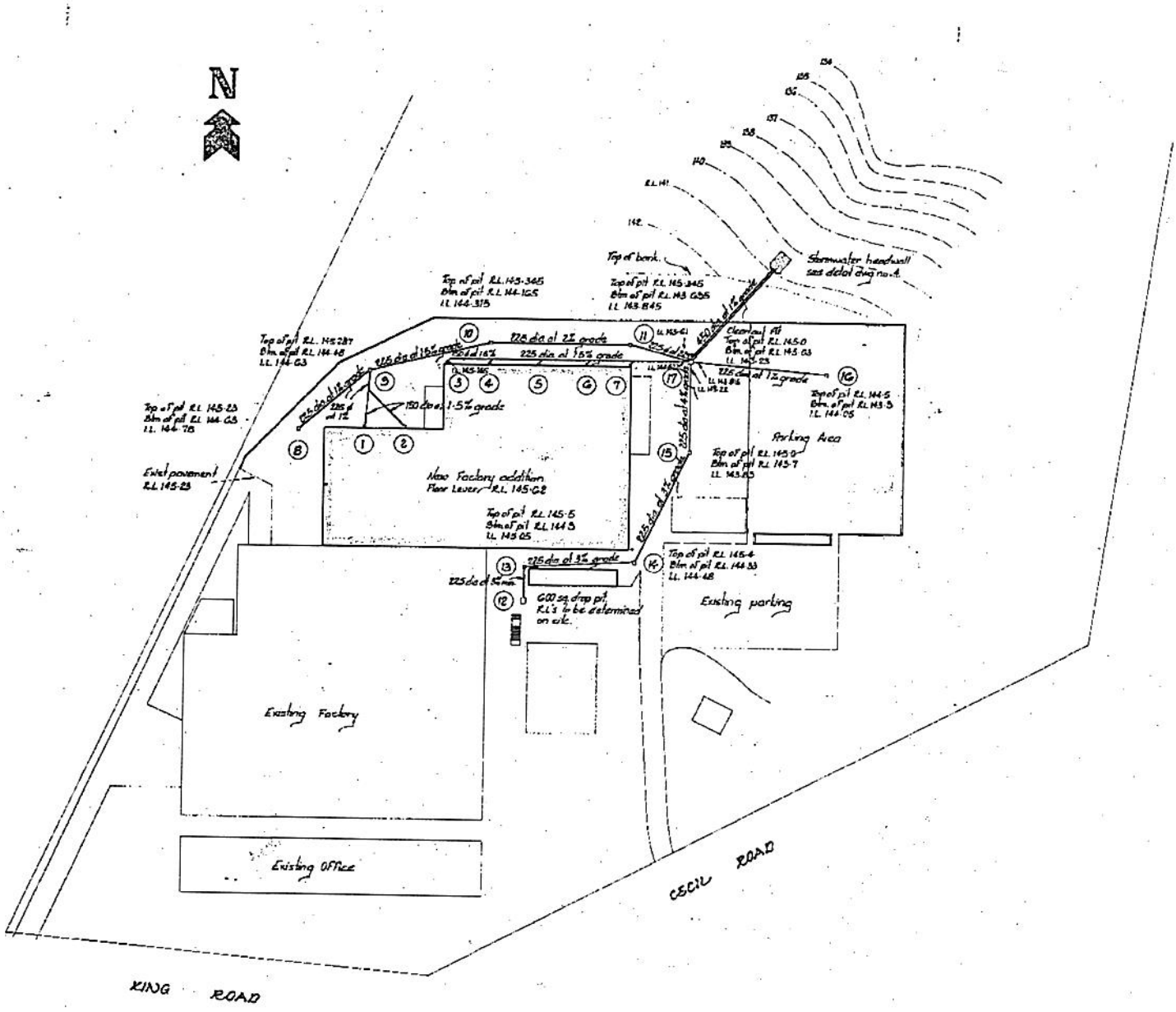
Rev #	Section Title / Subtitle	Changes Made * (See below)	Changes Made / Reason for Changes	Date	Author of Changes
1	All	N	New document	30/06/12	M. Matienzo
2	Potential Offensive Odour Table 5 Risk Rating of Site Hazards Table 7 Description of Safety Equipment Testing of Plan Review of Plan Staff Training	A A A A A A	Added requirements as set in the EPA Licence Added Potential Offensive Odour Added Potential Failure to Meet Noise Limits Added Testing and Review of Plan and Staff Training	23/12/13	M. Matienzo

3	Pollution Incident and Control Coordinators: Table 5: Storage Chemicals Potential Failure to Meet Noise Limits Incident Management Procedure for Communicating with the Community	DA A A A	Deleted previous personnel- no longer at Jalco Cosmetics. Addition of two new personnel's. Addition of: *Chemicals may enter water drains after spill*- in the Risk Associated Risks. Addition of Potential Failure to Meet Noise Limits, in accordance to EPA regulations. Addition of: A. Incident Management Procedure for Communicating with the Community B. Notification of Adjacent Companies and Neighbours	22/08/14	J.Corns
4	Facility Information Pollution Incident and Control Coordinators Prevention Of Pollution Incidents Storage of Chemicals	R A A R A A	Update Facility Information (Region) Addition of Pollution Incident and Control Coordinators Addition of control measures of spill kits, drain seal and drain stop. Correction of discharge point of treated waste water Addition of assessment of stormwater when drain stop is activated. Addition of Stormwater Drains Layout in appendix Update of DG storage list	15/3/2017	A. Ye
5	Related Document	R	Update reference	1/11/2017	A. Ye
6	Control Coordinators	O	Updated Pollution incident Control coordinators phone numbers	14/11/2018	Peter Dimitriadis
7	All	A	Additional info in line with new 2019 Guidelines	15/07/2019	Peter Dimitriadis
8	Control Coordinators	DA	Deleted previous personnel- no longer at Jalco Cosmetics. Addition of new site Manager	07/04/2022	Peter Dimitriadis
9	Control Coordinators	DA	Deleted previous personnel- no longer at Jalco Cosmetics. Addition of new site Manager	23/10/2023	Peter Dimitriadis

= LEGEND

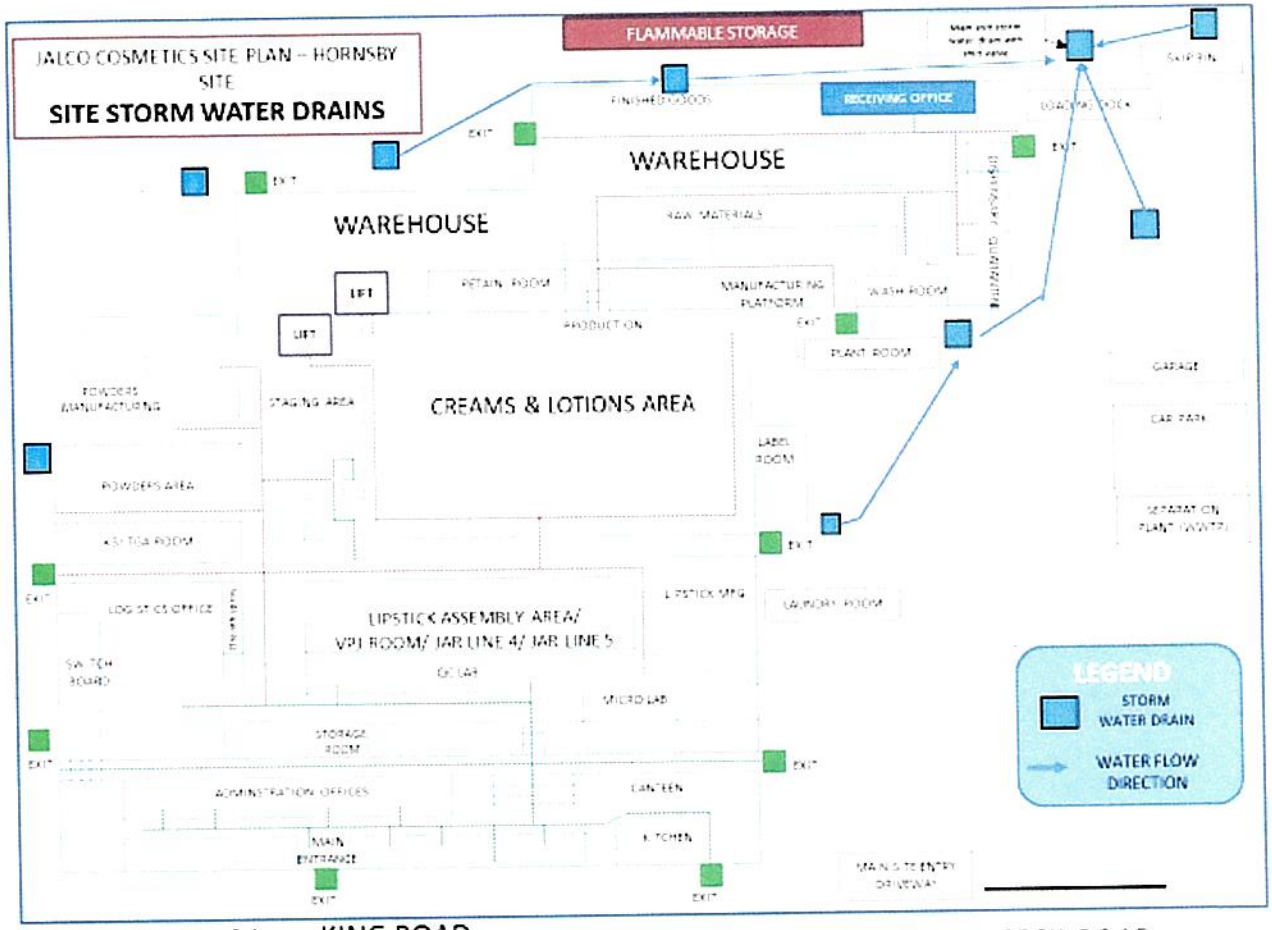
A = Additional Information D = Deletion of Information R = Rewording O = Other N = New

Appendix 1. Jalco Cosmetics Stormwater Drains Layout



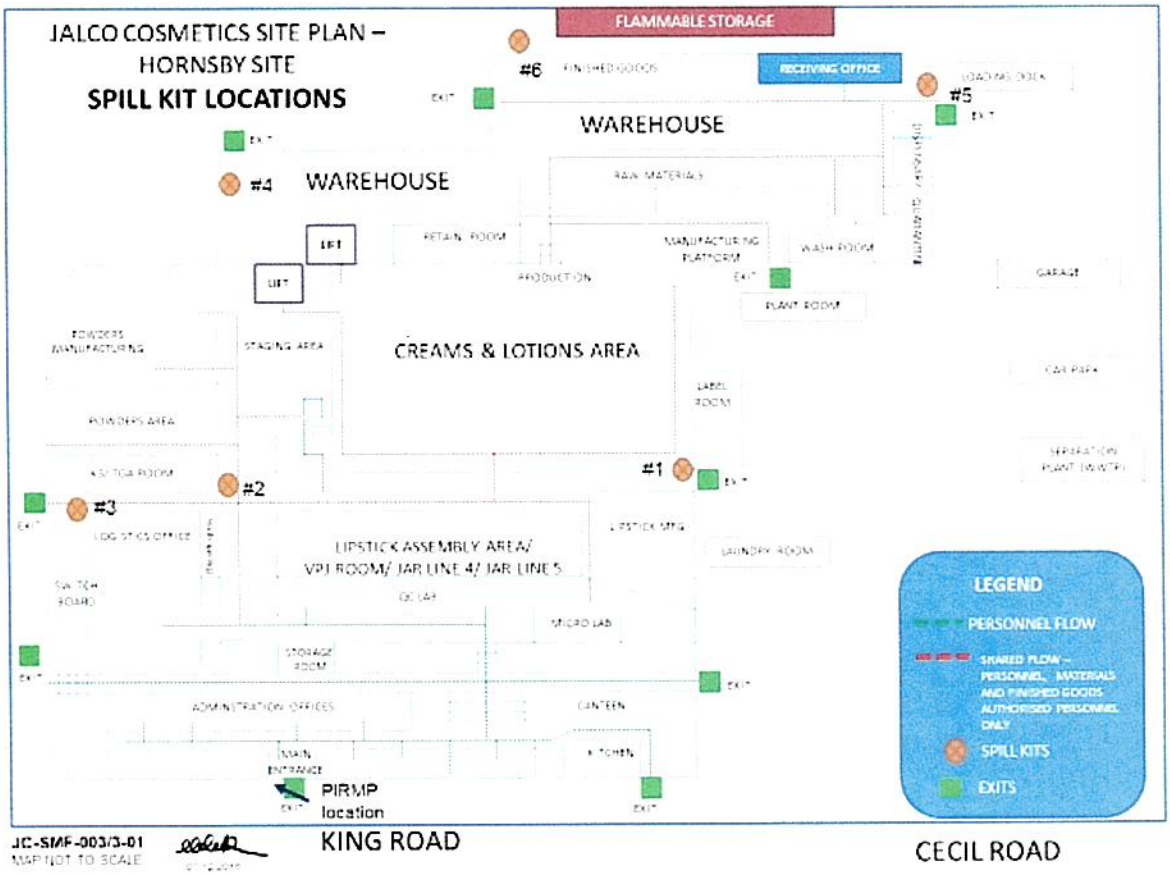
DRAINAGE LAYOUT PLAN

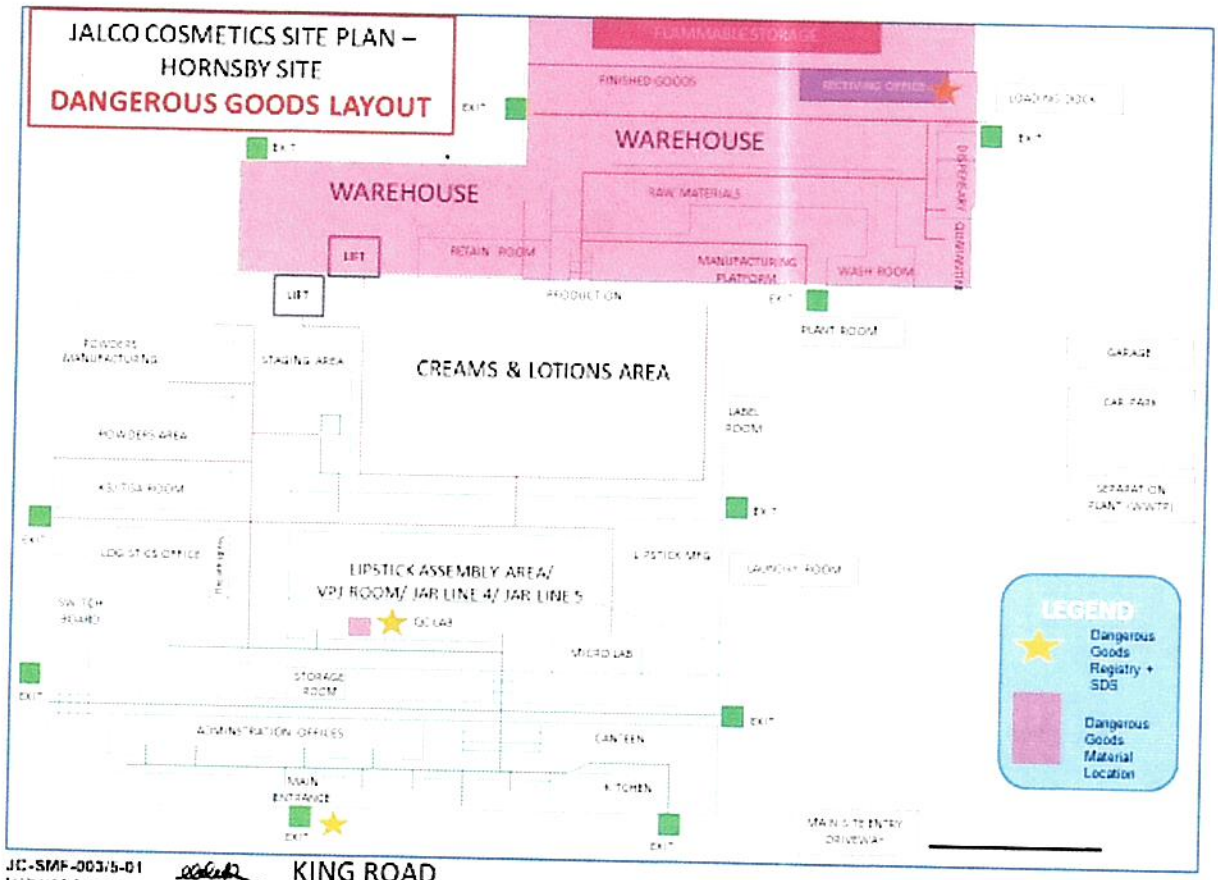
Note:- Paving to be graded to nearest pit
For all pit details refer to dwg no. 4


JALCO COSMETICS SITE PLAN – HORNSBY SITE
SITE STORM WATER DRAINS
FLAMMABLE STORAGE
RECEIVING OFFICE
WAREHOUSE
WAREHOUSE
CREAMS & LOTIONS AREA
LIPSTICK ASSEMBLY AREA/ VPI ROOM/ JAR LINE 4/ JAR LINE 5
PLANT ROOM
GARAGE
CAR PARK
LAUNDRY ROOM
CANTEEN
KITCHEN
MAIN ENTRANCE
LEGEND
STORM WATER DRAIN
WATER FLOW DIRECTION
KING ROAD
CECIL ROAD
JC-SMF-003/7-00
MAP NOT TO SCALE

Appendix 2: Satellite photo of site and surrounding areas.

Appendix 3: Spill kits and Dangerous goods areas





JC-SMP-003/5-01
MAP NOT TO SCALE