



Pollution Incident Response Management Plan

Harrison Manufacturing Co. Pty. Ltd.

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 1 of 13
PRINTED COPY - UNCONTROLLED		



Contents

1. PURPOSE/SCOPE OF THE PLAN	3
2. PIRMP AND SITE OVERVIEW	3
3. ROLES AND RESPONSIBILITIES	7
3.1. Role Responsibilities	7
4. PROCESS	8
4.1. Pollution Incident Management Procedure	8
4.2. Mechanisms for providing early warnings and regular update	9
4.3. Environmental Training Requirements	10
4.4. Testing and Review of this PIRMP	10
4.5. Abbreviations and Definitions	10
5. REVISION / AMENDMENTS HISTORY	11
6. ATTACHMENT A: ENVIRONMENTAL HAZARDS & RISKS	12

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 2 of 13
PRINTED COPY - UNCONTROLLED		



1. PURPOSE/SCOPE OF THE PLAN

This Pollution Incident Response Management Plan sets out the procedures to be followed in the event of a pollution incident at Harrison Manufacturing Co Pty Ltd's (HMC's) grease and lubricants manufacturing plant (Development Plan: LOT 2 DP 600059 & LOT1 & 2 DP29459) by HMC's site personnel in order to comply with the requirements of the *Protection of the Environment Operations Act 1997* (POEO Act).

The objectives of this Pollution Incident Response Management Plan (PIRMP) are to:

- Document the notification and management processes and procedures for compliance with the *Protection of the Environment Operations Act 1997*.
- Establish the roles and responsibilities of HMC's site personnel with respect to the PIRMP
- Provide a description of the hazards to human health or the environment associated with the manufacturing activities under EPA license 139 and their associated likelihood (see also Attachment A),

2. PIRMP AND SITE OVERVIEW

Harrison Manufacturing Co Pty Ltd (HMC) is holder of an environment protection licence under the POEO Act (Licence No. 139).

This PIRMP explains the procedures around the existing operation to meet all the legal requirements. The existing operation of grease and oil-based lubricant manufacturing plant and associated facilities.

A location map is provided in Figure 1

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 3 of 13
PRINTED COPY - UNCONTROLLED		



Figure 1: Site location map.

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 4 of 13
PRINTED COPY - UNCONTROLLED		



Pollution Incident Response Management Plan

A current layout plan of the site is given in **Figure 2** below:

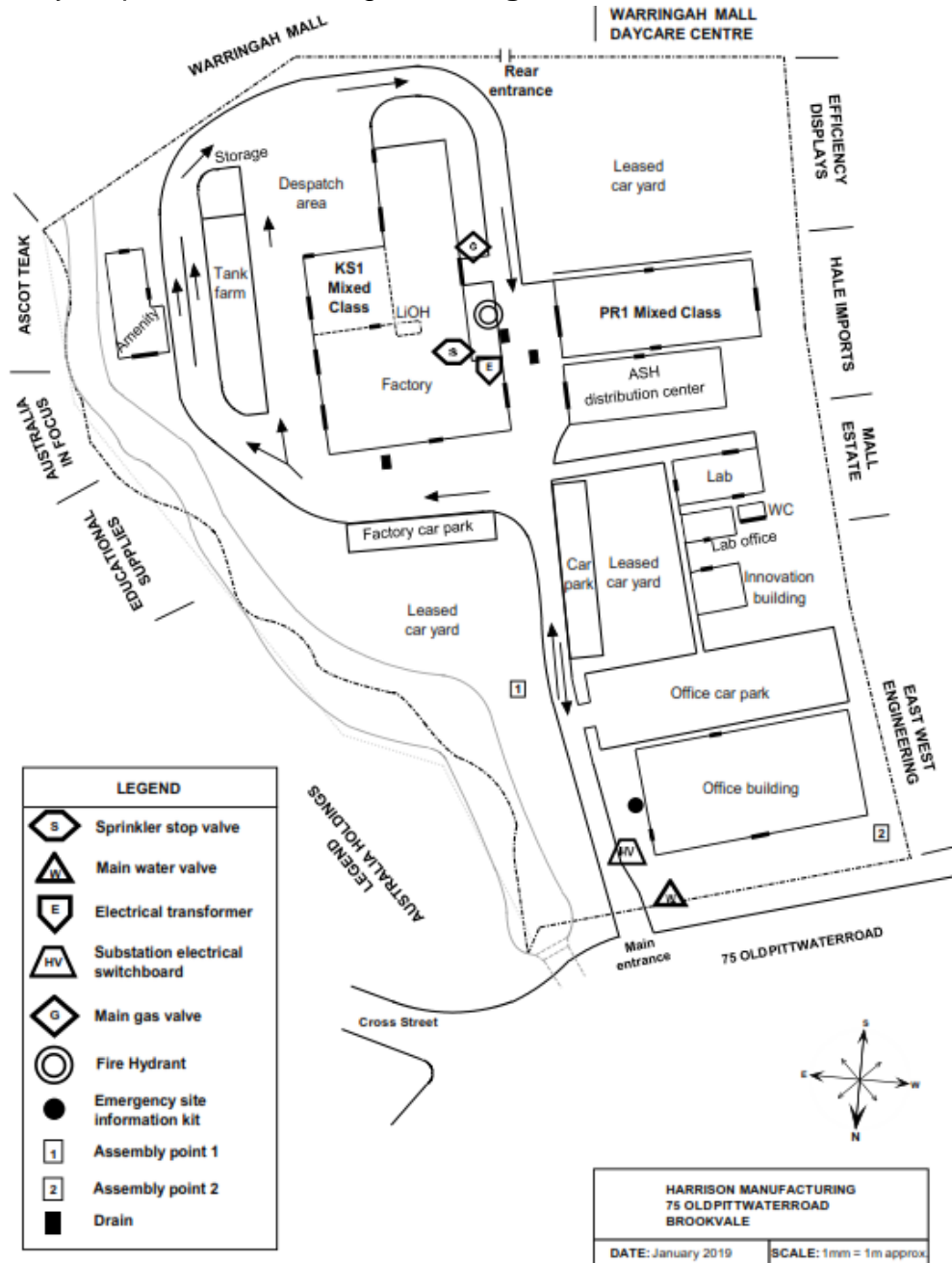


Figure 2: Site lay out plan

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 5 of 13
PRINTED COPY - UNCONTROLLED		



Pollution Incident Response Management Plan

A overview of location of utilities is provided in Figure 3 below

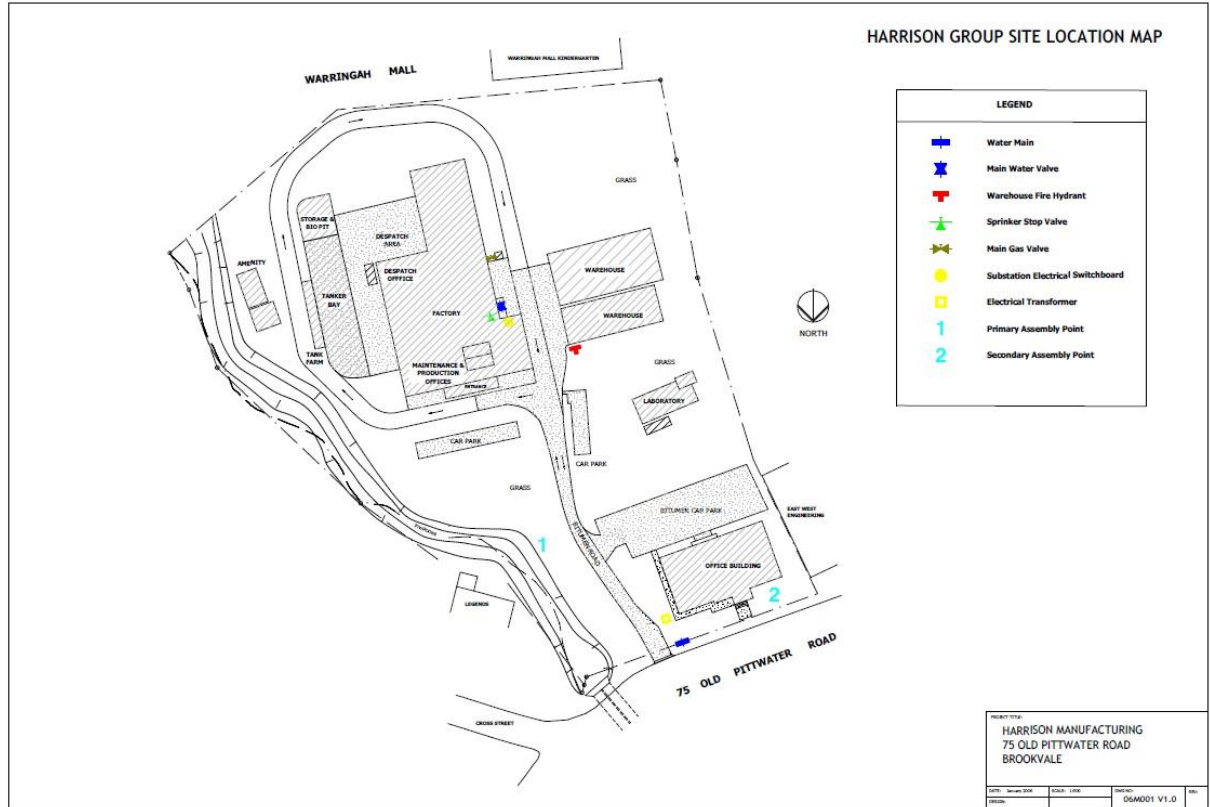


Figure 3: Location of utilities

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 6 of 13
PRINTED COPY - UNCONTROLLED		



HMC site area is approximately 2.6 hectares. Tank farm, storage and production areas are located within bunded areas. A concrete paved drain pit system in oil fill point and grease area were designed to capture any spillage from the area to oil/water separator. Spill kits and fire-fighting equipment are stored around the site.

HMC uses batch processes to manufacture both grease and oil-based lubricants. Key plant inputs and onsite storage quantities at any time include:

Table 1: Inventory of potential pollutants on the premises

Material	Maximum quantity stored on site
C1 combustible liquids	< 375 KL
DG Mixed Class	< 40 T
Other Raw Materials	< 300 T
Waste water	< 7 KL

3. ROLES AND RESPONSIBILITIES

3.1. Role Responsibilities

Role	Responsibilities
CEO	-Review and approve HMC's PIRMP following annual senior management review meeting
Manufacturing Services Mgr Mr. Frank van der Zanden Mob.: 0457 728 704	- Ensure that the CEO is fully briefed regarding any reportable pollution incidents -Manage the response to a pollution incident -Coordinate the communication and notification of all stakeholders, including as per the PIRMP -Ensure all staff are trained on the requirements of the PIRMP and ensure compliance with it -Act as the back-up for the QA & Compliance Manager in his absence
QA & Compliance Coordinator	-Complete annual review of PIRMP

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 7 of 13
PRINTED COPY - UNCONTROLLED		



Pollution Incident Response Management Plan

	<ul style="list-style-type: none"> -Notify and liaise with all the relevant authorities, neighbours and local community in case of a reportable pollution incident as per the PIRMP -Investigate the incident and complete the report -Act as the back up for the Manufacturing Services Manager in his absence -Assist in compliance tracking and reporting
Other Managers & Supervisors	<ul style="list-style-type: none"> -Notify the Manufacturing Services Manager and QA & Compliance Manager in case of a reportable pollution incident
All Employees	<ul style="list-style-type: none"> -Take reasonable care so the activities they propose to undertake do not cause any harm to the environment -Notify your immediate Supervisor or Manager in case of a reportable pollution incident -Actively participate in training as required
All Contractors	<ul style="list-style-type: none"> - Take reasonable care so the activities they propose to undertake do not cause any harm to the environment -Notify HMC Supervisor or Manager in case of a reportable pollution incident

4. PROCESS

4.1. Pollution Incident Management Procedure

It is important to minimize the impact of any pollution incident. Any spill or loss of control should be controlled immediately by stopping the source of the leak and applying appropriate spill containment materials if it can be done safely. For more detail please refer to the spill response procedure.

Any pollution incident must be reported immediately to a Supervisor or Manager so it can be formally logged and assessed.

External Complaints can be made through the HMC telephone line during operating hours. The company telephone number is located on the company website, <http://www.harrisonmanufacturing.com.au/>. Pollution incidents identified through

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 8 of 13
PRINTED COPY - UNCONTROLLED		



external complaints should be responded to in the same manner as incidents identified by HMC personnel or contractors on site.

Depending on the impact of the pollution incident the external notification requirements may also be triggered.

To assess the impact of an incident a description of all relevant hazards to human health or the environment shall be identified and analysed using the Risk Assessment matrix. If a pollution incident cannot be controlled appropriately with site resources then the Emergency Procedure must be activated.

HMC is required to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened. Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire & Rescue, Police and Ambulance Services of NSW are the first responders, as they are responsible for controlling and containing incidents.

Authority	Contact number
First Responders (Fire Brigade, Police & Ambulance Service NSW)	000
Environmental Protection Authority	13 15 55
Ministry of Health NSW	02 9477 9400
WorkCover NSW	13 10 50
Fire & Rescue NSW (not needed if 000 was called first)	1300 729 579
Warringah Council	02 9942 2111

The incident reporting requirements will be met in accordance with EPL Condition R2.1.

The pollution incident and response shall be reviewed by HMC management with a view to:

- Preventing similar incidents occurring in future; and
- Improving pollution incidence response.

4.2. Mechanisms for providing early warnings and regular updates

It is important that owners and occupiers of premises in the vicinity of the Harrison Manufacturing site receive early warnings and regular update. This is the

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 9 of 13
PRINTED COPY - UNCONTROLLED		



responsibility of the Manufacturing Services Manager, who maintains an up to date contact list for all immediate neighbours (as shown in Figure 2).

The risks associated with each pollution incident will be assessed to determine the communication to neighbouring sites.

Phone calls to the relevant neighbours will be first and fastest way to warn them of an incident which has the potential to affect their site.

4.3. Environmental Training Requirements

All HMC personnel shall be trained in the relevant requirements and implementation of this PIRMP during their induction.

Environmental Procedures and any amendments/updates shall be discussed with relevant personnel.

HMC staff will receive refresher training on a regular basis to keep the staff aware of their responsibilities in relation to this plan and inform them of any changes. This will be done through interactive group discussion and will include checking to see if training information is retained.

The Manufacturing Services Manager shall review the training needs of each team member every 12 months.

4.4. Testing and Review of this PIRMP

This PIRMP will be tested at least annually using various practical scenarios and revised in accordance with the review findings. The test shall include a check of the relevant notification numbers

The CEO shall approve any recommendations

A list of revisions will be maintained under the Revision/Amendments History.

The most recent test of the PIRMP was conducted on 19th October 2018 and was carried out by the Manufacturing Services Manager and the Kitting Operator. The findings of the test were shared with the site management and supervisor team.

4.5. Abbreviations and Definitions

Council	Warringah Council
EPA	Environment Protection Authority
EPL	Environment Protection Licence No. 139
PIRMP	Pollution Incident Response Management Plan

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 10 of 13
PRINTED COPY - UNCONTROLLED		



Pollution Incident Response Management Plan

HMC Harrison Manufacturing Co. Pty Ltd
Site The site located at 75 Old Pittwater Road, NSW
2100(LOT 2 DP 600059 & LOT1 & 2 DP29459)

5. REVISION / AMENDMENTS HISTORY

Author	Comments	Released
Manufacturing Services Mgr	Updated as per POEO Section 98C & general revision	23-Jan-19
Manufacturing Services Mgr	Updated position titles & general revision	05-Dec-17
Manufacturing Services Mgr	Updated Neighbour Contacts & general revision	16-Jun-15
Manufacturing Services Mgr	New document	21-Jul -14

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 11 of 13
PRINTED COPY - UNCONTROLLED		



6. ATTACHMENT A: ENVIRONMENTAL HAZARDS & RISKS

Description	Likelihood of adverse impact before safety measures	Description of safety equipment and pre-emptive actions taken to minimize or prevent any risk of harm to human health or the environment	Likelihood of adverse impact after safety measures
Potential for spills affecting Water/Soil Quality	Likely	<ul style="list-style-type: none"> ◆ Bunding of Tank Farm and other liquid storage areas; ◆ Properly designed production room drainage pit to capture all possible raw material, grease and oil spills from within the process plant ◆ Absorbent socks to be used to protect stormwater drainage points ◆ Spill kits to be provided and training of relevant personnel; ◆ Regular monitoring and maintenance of spill kits ◆ Truck unloading/loading and parking to occur in designated areas; ◆ Periodical integrity assessment of the bunded areas 	Rare
Waste water	Likely	<ul style="list-style-type: none"> ◆ Minimising water use and recycling where possible; ◆ Maintain Stormwater drains and Bio-ponds to receive stormwater runoff and recycled water as part of the Preventative Maintenance Program ◆ Regularly assess integrity of holding tank used for collecting condensation water from wet scrubber ◆ Regularly clean and unblock all the drainage pits to Bio-ponds 	Rare
Storage and handling of Dangerous Goods	Possible	<ul style="list-style-type: none"> ◆ Minimize the use of Dangerous Goods by looking for alternatives where possible. ◆ Proper storage of all materials on site 	Rare
Waste generation	Unlikely	<ul style="list-style-type: none"> ◆ Minimise waste generation where possible;(Reduce, Reuse , Recycle) 	Rare

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 12 of 13
PRINTED COPY - UNCONTROLLED		



Pollution Incident Response Management Plan

		<ul style="list-style-type: none"> ◆ Discharge to licensed waste transporters only ◆ Track waste disposal to EPA licensed waste transporters 	
Traffic	Unlikely	<ul style="list-style-type: none"> ◆ Bulk deliveries during daylight hours as much as possible ◆ One-way traffic flow for trucks on site 	Rare
Air Quality	Likely	<ul style="list-style-type: none"> ◆ Fume/vapour generated from the production is treated through either condensation in wet scrubber and/or thermal oxidation ◆ Maintain vent system as part of Site Preventative Maintenance Program 	Rare
Noise disturbances	Possible	<ul style="list-style-type: none"> ◆ Periodically conduct Noise surveys ◆ Evaluate noise for any significant new equipment 	Rare
Light disturbances	Unlikely	<ul style="list-style-type: none"> ◆ Periodically review lighting needs and assess new technologies as they become available 	Rare
Emergency Response	Possible	<ul style="list-style-type: none"> ◆ Maintain, and implement as necessary, a current emergency response plan for the premises. ◆ Maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises 	Rare

Version: 2.0	Created on: 23-Jan-19	Document No: 02 SOP 035E
Location: Document register	Date Printed: 24-Jan-19	Page 13 of 13
PRINTED COPY - UNCONTROLLED		