



Pollution Incident Response Management Plan

Harrison Manufacturing Co. Pty. Ltd.

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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 & LOTA DP 166808) 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.

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 of the grease and oil-based lubricant manufacturing plant and associated facilities to meet all the legal requirements.

A location map is provided in Figure 1

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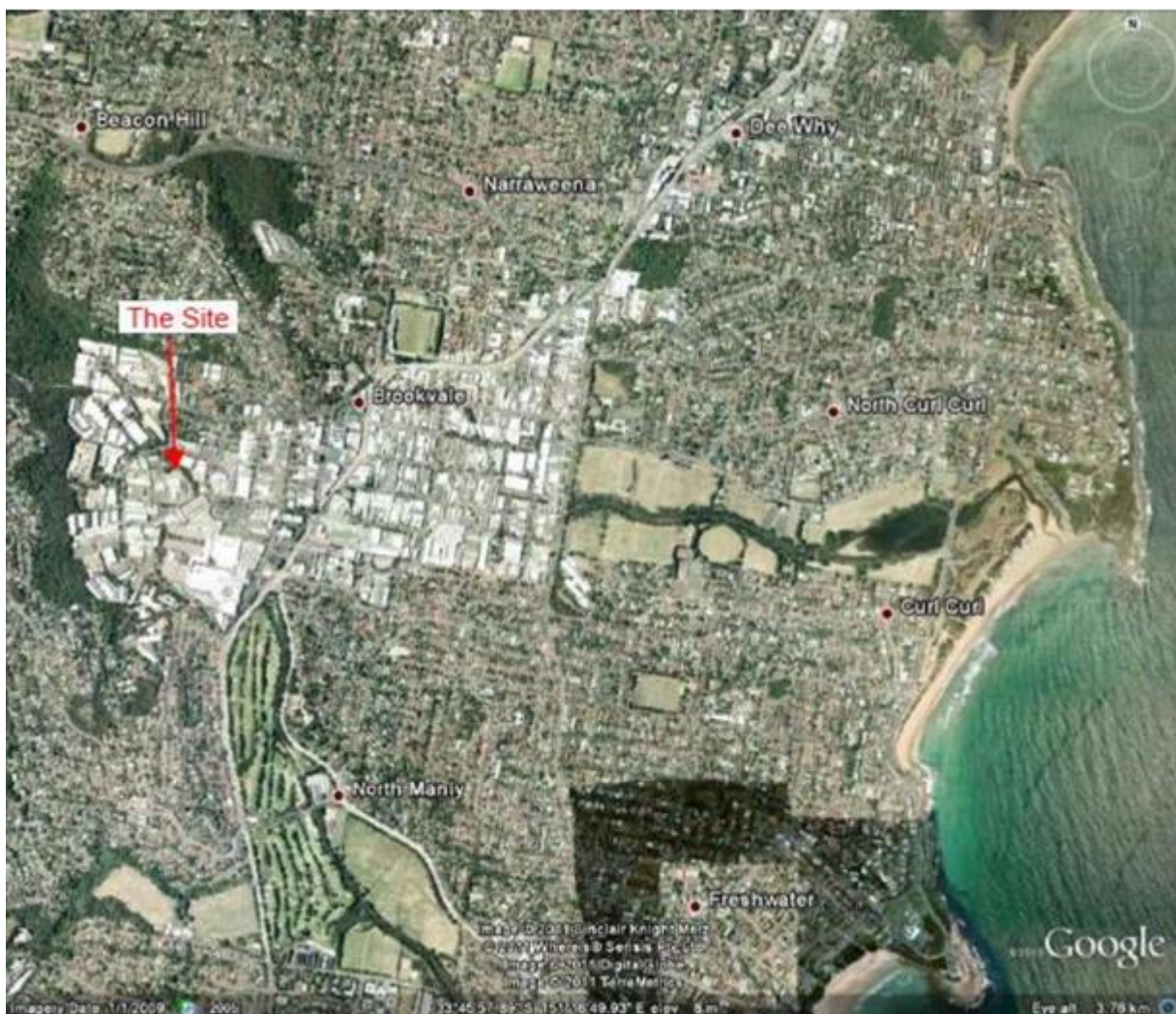


Figure 1: Site location map.

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3. ROLES AND RESPONSIBILITIES

The PIRMP roles & responsibilities of the HMC personnel are as per below

Role	Responsibilities
General Manager Operations Mr. Frank van der Zanden Mob.: 0457 728 704	<ul style="list-style-type: none">- 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 Quality & Compliance Coordinator in her absence
Q&C Coordinator Ms Christine Roche Mob.: 0488 037 124	<ul style="list-style-type: none">-Complete annual review of PIRMP-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 GM - Operations in his absence-Assist in compliance tracking and reporting
Other Managers & Supervisors	<ul style="list-style-type: none">-Notify the General Manager Operations and Quality & Compliance Coordinator 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 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 containment 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 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.

The CEO and General Manager Operations shall be responsible for ensuring incident reporting requirements are 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 incidents response.

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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 responsibility of the General Manager Operations.

The risks associated with each pollution incident will be assessed to determine the communication to adjacent 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

A Table with contact details is provided

Authority	Contact number
First Responders (Fire Brigade, Police)	000
Environmental Protection Authority	13 15 55
Ministry of Health NSW	02 9391 9000
SafeWork NSW	13 10 50
Fire & Rescue NSW (not needed if 000 was called first)	1300 729 579
Northern Beaches Council	1300 434 434

Brookvale Site Neighbours	Contact number
Westfield Mall Security	0418 600 843
Australia in Focus	02 9938 4233
Shiralee Butcher	02 9939 0116
Mall Estate	02 9905 0633
Sydney Powerboat Centre	0414 393 839 / 0455 157 400
Thorlux Lighting	1300 043 232
Portable Partitions	0478 801 064 / 1300 731 397
AVA Party Hire	02 9938 5599
Only About Children Daycare	02 9007 1645

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.



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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 General Manager Operations 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. It may also be tested within one month of any pollution incident occurring. The CEO will approve any recommendations.

4.5. Abbreviations and Definitions

Council	Northern Beaches Council
EPA	Environment Protection Authority
EPL	Environment Protection Licence No. 139
PIRMP	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 & LOT A DP 166808)

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