Primo Foods (Chullora)

Pollution Incident Response Management Plan (PIRMP)

Table of Contents

1 Introduction 4
2 Site Information 5
2.1 Site Location 5
2.2 Surrounding Land Uses 6
2.3 Surrounding Sensitive Environments 6
3 Overview of the PIRMP 7
4 Responsibility for PIRMP 8
5 Notifications 9
5.1 Introduction 9
5.2 Notification Protocol 10
5.3 Community Notification 12
5.4 Communication with the Media 13
6 Environmental Hazards/ Inventory of Pollutants 14
6.1 Overview 14
6.2 Dangerous Good Storage and Transport 14
7 Pre-emptive Management 16
7.1 Equipment 16
7.2 Spills Clean Up Procedure 16
7.3 Evacuation Procedures 17
8 Control Procedures 18
8.1 Spill Response 18
8.1.1 Hazardous Substance 18
8.1.2 Delivery Vehicle 18
8.1.3 Ammonia Leak Incident 19
8.1.4 Gas Leaks 19
8.2 Wastewater Treatment & Effluent System 20
8.3 Waste Management and Disposal 20
8.3.1 General waste and recycling 21
8.3.2 Chemical / hazardous waste 21
8.3.3 Glass tubes-Fluorescent, HID, CFL, light Globes and LED lights 21
8.4 Remediation 22
9 Training and Testing 23
9.1 Training 23
9.2 Testing of PIRMP 23
9.3 Updating PIRMP 23
Appendix A – Site Maps 24
Appendix B – Environmental Risk Assessment and Plan 28

Appendix C – List of Potential Pollutants on Site 31
Appendix D – Publicly Available Information 35

1 Introduction

Primo Foods (Chullora), possesses Environmental Protection Licence (EPL), No. 6252. This licence is required under the *Protection of the Environment Operations Act 1997* (POEO Act).

Under legislation managed by the NSW Environment Protection Authority (EPA) there is a duty to report pollution incidents under section 148 of the POEO Act.

In 2012, changes under the *Protection of the Environment Legislation Amendment Act 2011* required holders of an EPL to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The PIRMP must:

1. Be kept at all times at the premises;
2. Include information as required in the legislation;
3. Be tested annually; and
4. Be implemented if a pollution incident does occur.

This PIRMP has been developed to ensure that pollution incidents resulting in or having the potential to cause material harm to the environment are correctly managed and reported. The notification of environmental incidents under this PIRMP is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined in the POEO Act.

This PIRMP has been prepared to form part of Primo Foods (Chullora) overall emergency response plans. The following existing internal plans and procedure documentation underpin this PIRMP and should also be referred to as part of emergency management:

- Emergency Management Plan (With Ammonia sub Emergency Plan);
- Dangerous Goods Site Manifest Chullora NSW (refer Emergency Management Plan); and
- NSW EPA Environment Protection Licence No. 6252.

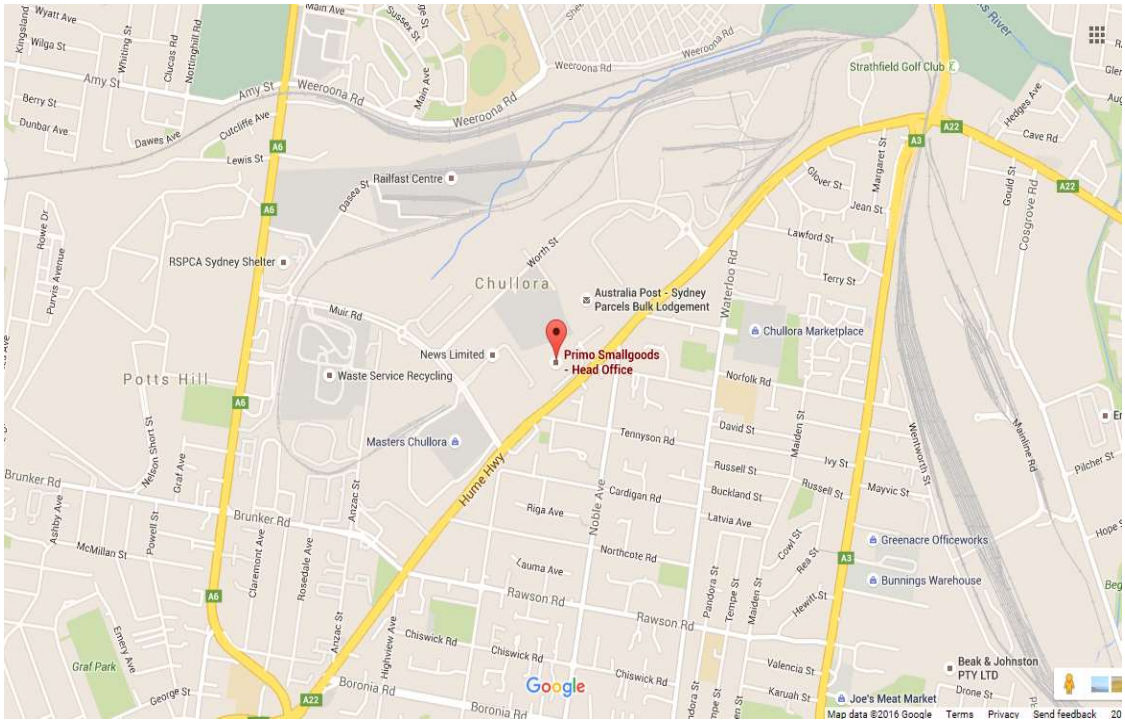
If you have any questions about this plan, or suggested revisions, please contact Primo's Environment Compliance Manager (**Natasha Smith**) on 0448 076 757.

2 Site Information

2.1 Site Location

Primo Foods (Chullora), is located within an industrial area at 18 Hume Highway, Chullora NSW 2190. The site is predominantly a meat processing plant with distribution, administration and shopping facilities.

The following diagram illustrates the location of Primo Foods (Chullora), with site maps of the location contained in **Appendix A** of this Plan.



The main buildings/sites within the location consist of:

- A main building (meat processing);
- Effluent treatment building;
- Trade shop;
- Car park; and
- Grass/vegetated areas.

The processing/manufacturing factory occupies most of the land and produces meat “smallgoods” products. The two-storey Administration building is located on the eastern side of the site housing Administration/Sales staff. The processing and manufacture of the smallgoods products is from the raw material stages through to the finished product.

2.2 Surrounding Land Uses

The site is surrounded by the following:

North & North West – Australia Post;

East – Hume Hwy & Car Dealerships;

South – News Limited (Paper Printer); and

West – Paper Company (industrial Warehouse).

In addition, to the East (over Hume Highway), there are residential premises.

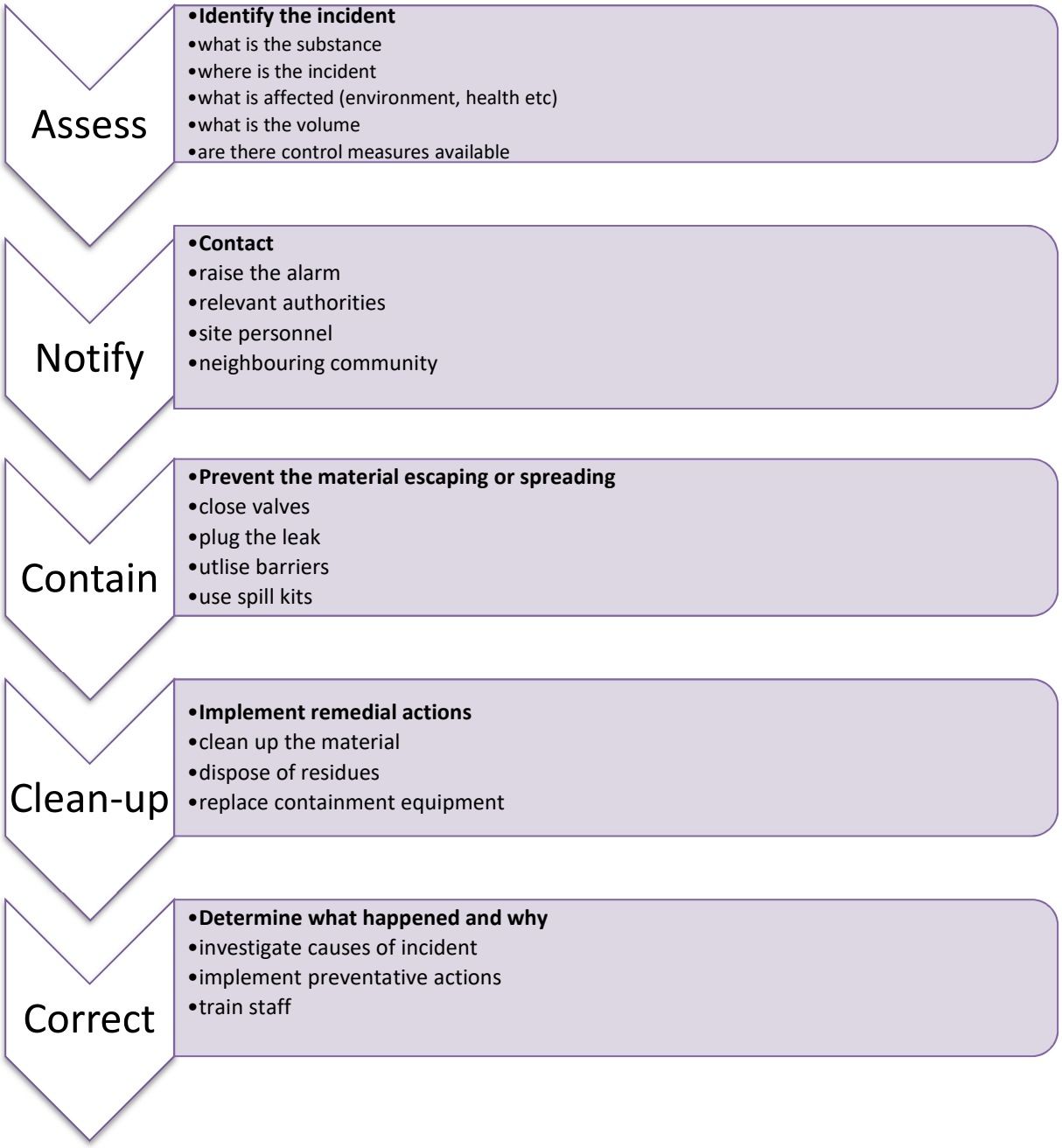
2.3 Surrounding Sensitive Environments

The following are the identified environmental sensitive areas

- A wet land (lake) to the North West located at a distance of approximately 600 metres; and
- Residential housing within an approximate 50 metre distance.

3 Overview of the PIRMP

The following summarises the actions to be undertaken by Primo Foods (Chullora) should a pollution incident occur or suspected to have occurred. This Pollution Incident Response Management Plan (PIRMP), contains the necessary detail and information to effectively manage a pollution incident.



4 Responsibility for PIRMP

If a pollution incident occurs at the premises so material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the Primo personnel identified in the table below are responsible for immediately implementing the relevant sections of the PIRMP applicable to the incident.

The Primo personnel that have been allocated specific responsibilities in relation to the management of a pollution incident are summarised in the following table:

Name	Contact Details	Position	Responsibility
Brent Eastwood	B/H 07 3423 5040 A/H	CEO	National
Tim Molloy	B/H 02 9742 0000 A/H 0415 041 497	Plant Manager Chullora	Chullora - NSW
Adrian Lister	B/H 07 3423 5247 A/H 0404 796 849	National Engineering Manager	National
Omer Al Jumaily	B/H 02 9742 0144 A/H 0437 737 005	Engineering Manager	Chullora - NSW ▪ Responsible for undertaking notification as defined in this PIRMP ▪ Responsible for managing the response to a pollution incident ▪ Responsible for coordinating communications with affected community members ▪ Responsible for coordinating the response to a pollution incident. ▪ Responsible for communicating PIRMP to site personnel ▪ Responsible for arranging testing and updating of the PIRMP ▪ Ensure site personnel are aware of this PIRMP.
Fred Fidelis	B/H 02 9742 0206 A/H 0428 823 942	Maintenance Supervisor	Chullora - NSW
Ricardo Le	B/H 02 9742 0094 A/H	Senior WHS Coordinator	Chullora - NSW
Nathan Mascherin	B/H 02 9742 0121 A/H 0422 882 281	WHS Coordinator	Chullora - NSW
Troy White	B/H 03 9316 4732 A/H 0409 189 308	JBS Group Environmental Manager	National ▪ Responsible for authorising the PIRMP and all subsequent updates

5 Notifications

5.1 Introduction

The definition of a pollution incident is:

> *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*.

A pollution incident is required to be notified if there is a risk of "material harm" to the environment, which 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."

If a spill occurs on site that has resulted in or has the potential to cause material harm to the environment the authorities and other personnel as **listed on page 7** will be notified immediately. Additional organisations that may be contacted are **listed on page 8**.

Employees are instructed to report any environment or safety incidents to their Supervisor, and to activate the emergency alarm system.

If an environmental incident occurs that is a potentially notifiable pollution event it must be reported to JBS Australia CEO (**Brent Eastwood**), General Manager Operations (**Dan Alderton**) and Primo Environment Compliance Manager (**Natasha Smith**). The Chullora Engineering Manager (**Omer Al Jumaily**) is responsible for consulting relevant Primo site personnel to assess if a notifiable pollution incident has occurred and then commence the external authority reporting process.

Under Section 150 of the POEO Act, the following information will be reported:

S 150 Relevant information to be given:

1. *The relevant information about a pollution incident required under section 148 consists of the following:*
   a) *the time, date, nature, duration and location of the incident,*
   b) *the location of the place where pollution is occurring or is likely to occur,*
   c) *the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,*
   d) *the circumstances in which the incident occurred (including the cause of the incident, if known),*
   e) *the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,*
   f) *other information prescribed by the regulations.*

2. *The information required by this section is the information known to the person notifying the incident when the notification is required to be given.*
3. *If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.*

5.2 Notification Protocol

All Primo employees and contractors working at the premises are responsible for alerting management personnel of all environmental incidents or hazards, which may result in a material environmental incident, regardless of its nature or scale.

The following summarises the notification protocols to be adopted by Primo personnel.

Firstly, call 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.

Sufficient detail of the incident must be reported to the EPA to enable appropriate follow-up action. The relevant information required includes:

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred (including the cause of the incident, if known);
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and
- Any information that is not known when the incident is notified must be provided immediately once it becomes known.

The Plant Manager (**Tim Molloy**) or the Senior WHS Coordinator (**Ricardo Le**) must notify the agencies listed in the following table below, in the provided order if a pollution incident has occurred that is classified as a **material harm incident** immediately. Regardless of the type and magnitude of the incident, the decision as to whether to report it to EPA (or not), should not delay the adoption of actions to ensure the safety of all personnel on or off-site.

AGENCY	CONTACT DETAILS
Fire and Rescue	**000** (To be contacted first in this order if the incident also presents an immediate threat to human health or property and emergency services are required, or last in this order if emergency response is not required.) **1300 729 579**
EPA	**13 15 55**
Liverpool Public Health Unit	**02 8778 0855**
WorkCover	**13 10 50**
Canterbury Bankstown City Council	**(02) 9707 9999** **(02) 9707 9000**

EMERGENCY PHONE NUMBERS - EXTERNAL	
EMERGENCY SERVICES	
Fire Brigade	**000**
Police	
Ambulance	
State Emergency Service	13 25 00
Poisons Information Service	13 11 26
SITE SECURITY	
Gatehouse	2159 or 2909
UTILITIES	
Gas – Origin Energy	13 23 34
Water Sydney water	13 20 90
Electricity – Stanwell	1800 300 351
MEDICAL SERVICES	
Bankstown Hospital	(02) 9722 8000
Galen and Gray Medical Centre	1300 009 009
ENVIRONMENTAL	
Environment Protection Authority (EPA)	13 15 55
NSW Department of Environment & Climate Change - DECC	
Solid Waste Contractor (Suez)	13 13 35
Liquid Waste Contractor (Suez)	13 13 35
NEIGHBOURING BUSINESSES	
Australia Post	13 76 78
Car Dealerships Noble Toyota	(02) 8017 1713
News Limited (Paper Printer)	(02) 9288 1828
Spicers (Paper Company Industrial Warehouse)	(02) 9735 2666

PRIMO CONTACT NUMBERS		
Omer Al Jumaily	Engineering Manager	B/H (02) 9742 0144 A/H 0437 737 005
Samuel Andres Matinez Ramirez	Facilities Supervisor	B/H (02) 9742 0206 A/H 0428 823 942
Natasha Smith	Environment Compliance Manager	B/H (07) 33440048 A/H 0448 076 757

5.3 Community Notification

Notification of the nearby residents is an important aspect of the Plan to ensure that they are safe and kept informed throughout the management of the pollution incident.

The type of community notification will depend on the type of incident, its magnitude, potential for harm, appropriate management actions, duration and remediation actions.

All community stakeholders that may be affected by an incident will be notified. These include:

- Neighbouring residential property owners;
- Neighbouring commercial properties; and
- General public within the vicinity of the site, including pedestrians and motorists.

Contact details for neighbouring commercial properties are:

Business	Telephone number
Australia Post	137 678
Car Dealerships Noble Toyota	8017 1713
News Limited (Paper Printer)	(02) 9288 1828
Paper Company (industrial Warehouse) - Spicers	(02) 9735 2666

If an incident presents a significant risk of causing material harm to persons, property, and/or the environment to an area that is not trivial, any community stakeholders within these areas will be notified at the earliest convenience.

When it has been established that any community stakeholder is at risk from a spill that has the potential to cause material harm the following process will be implemented:

1. Community stakeholders will be contacted immediately after the relevant authorities have been contacted by telephone (or face to face if this is not possible).
2. Stakeholders will be advised of recommended actions that can be taken to prevent or minimise material harm (e.g., evacuate area, shut all doors and windows).
3. After the spill has been contained and managed by key personnel and authorities subsequent communication will be undertaken by Engineering Manager (**Omer Al Jumaily**) and relevant environmental/health advisors. These may include:
    - Follow up telephone calls and/or face to face contact;
    - Meetings with stakeholders; and
    - Written correspondence containing updates in regards to safety and environmental concerns associated with the pollution incident.

The Engineering Manager (**Omer Al Jumaily**) has the responsibility for ensuring all residents are contacted and kept advised. This person is also to act as the Primo contact for any resident communications in regards to the incident.

Information to be provided to the community will include the following:

- that an incident has occurred and what it is;
- potential impacts to;
- advice or recommendations based on the incident type and scale;
- site contact details; and
- communication protocols.

The Engineering Manager (**Omer Al Jumaily**) will liaise with the Local Authority/Council to communicate with the residents.

The method to be used for this communication will be (in this order):

I. Telephone each resident, door knocking and posting details on the Primo website; and

II. Use of letterbox drops to provide more detailed information.

In accordance with the requirements of section 153D of the POEO Act the following information must be made publicly available:

- procedures for contacting the relevant authorities including the EPA, the local council, NSW Health, SafeWork NSW, Fire and Rescue NSW and their contact details
- procedures for contacting the owners or occupiers of premises in the vicinity
- the procedures for communicating with the community
- mechanisms for providing early warnings and regular updates to premises in the vicinity
- for trackable waste transport licensees - the community engagement protocol for notifying people living or working within the vicinity of a pollution incident and keeping them informed of relevant matters.

The aforementioned information is contained in **Appendix D**, and is available on the Primo webpage: https://jbsfoodsgroup.com/businesses/jbs-foods-australia/jbs-australia-accreditations.

5.4 Communication with the Media

Only the Chairman or CEO (**Brent Eastwood**) has the authority to communicate with the media in regards to any environmental (or other) incident.

No members of the media or members of the community will be allowed to enter the site in an emergency. Site security has the authority and responsibility to ensure that this requirement is adhered to.

6 Environmental Hazards/ Inventory of Pollutants

6.1 Overview

The potential chemical hazards which have been identified for Primo Foods (Chullora) are listed in **Appendix C** which also contains a list of the normal quantities kept on site this information is also recorded in the Dangerous Goods Site Manifest. The location(s) of the storage of these chemicals is illustrated in the diagram contained in **Appendix A** of this Plan.

All chemicals have the relevant Safety Data Sheets as required by work, health and safety regulations. The Safety Data Sheets are located at the Gatehouse, Maintenance Workshop, WHS Offices in Main Building and respective places of storage. The facilities that store hazardous chemicals have been designed in accordance with Australian Standards.

There is a risk of spills and contamination of surface waters during transport, loading, unloading and storage of liquid materials.

The risk analysis and management of these hazards is based on the risk analysis as detailed in **Appendix B** of this Plan.

In addition to these chemical hazards, the following are other hazards that could impact on the environment:

- Discharge of untreated effluent due to failure of the on-site treatment plant;

  A number of wastewater streams are generated at the site, including:

  - Wash water from cleaning the plant;
  - Wash water from production process;
  - Domestic wastewater from office and amenities;
  - Boiler blowdown; and
- Noise emissions exceeding those allowed or in NSW EPA EPL No. 6252.

The risk of any biological airborne health hazards within the site is low.

6.2 Dangerous Good Storage and Transport

Chemical and flammable hazards shall be segregated in accordance with Australian Standard AS3833: *The Storage and Handling of Mixed Classes of Dangerous Goods in Packages and Intermediate Bulk Containers*, flammables from accelerators and stored in controlled temperature conditions where applicable. Any corrosive substance shall be stored in accordance with Australian Standard AS3780: *The Storage and Handling of Corrosive Substances* and any oxidising agent shall be stored in accordance with Australian Standard AS4326: *The storage and handling of oxidizing agents*.

Any substance that is considered flammable or explosive **MUST** be in approved safety containers.

Incompatible substances/goods will not be stored or transported together. In general, hazardous substances/goods are not transported off-site on a regular basis, in cases where this does occur; it is the responsibility of the person packaging these substances/goods to take appropriate precautions.

In determining appropriate packaging, consideration shall be given to hazards that may occur in storage or internal transportation such as; vibration, water or condensation, mishandling etc..

For information on transportation of these items, please refer to the Senior WH&S Coordinator (**Ricardo Le**).

Transport or movement of chemical substances around the workplace will comply with the legislative requirements, the manufacturer's advice on the Safety Data Sheet (SDS), and Primo procedures to reduce the risk.

All expired, waste or spillage products shall be disposed of in accordance with NSW Environment Protection Authority (EPA) and Local Government legislation.

Disposal of chemical substances is in accordance with the legislative requirements. Substances must not be disposed of inappropriately (e.g. into a sink or sewerage system). Substances accompanied by their current SDS must not be donated externally by Primo Foods, without the signed approval of senior management for that site.

Gas cylinders consist of:

- LPG;
- Ammonia;
- Carbon Dioxide;
- Nitrogen;
- Oxygen;
- Acetylene;
- Argon;
- Aligal 23; and
- Aligal 28.

The locations of these cylinders are illustrated in the diagram contained in **Appendix A** of this Plan.

The locations, types of materials stored and maximum quantities of other materials such as wastewater, effluents, triple interceptor pits and stormwater are also illustrated in the diagram contained in **Appendix A** of this Plan.

7 Pre-emptive Management

7.1 Equipment

The following are the actions and equipment that have been implemented to prevent any pollution incident and/or minimise the impact of the incident.

1. Spill kit, personnel protective equipment stores and firefighting equipment locations are illustrated in the diagram contained in **Appendix A** of this Plan. This equipment is located in appropriately designated areas.

   Spill kits are located in easy accessible locations within the workshop or other risk areas. Suitable spill kits are present in vehicles that transport chemicals off site (e.g. delivery and mobile services). Some portable spill kits use a wheelie bin or similar type of mobile container. Spill kits are regularly maintained as appropriate

2. Bunding for chemical tanks.
3. Cages for storing of gas containers such as LPG bottles.
4. All chemical and liquid materials that have the potential to cause environmental pollution are located in designated bunded areas, these areas are checked monthly by the WHS Coordinator.
5. If the site is required to be evacuated as a result of a pollution event, evacuation procedures and muster points are detailed in the Emergency Management Plan.

An important component of Primo's actions to prevent the potential for an environmental incident to occur and/or reduce the impacts should such an incident occur is to utilise the following:

1. That provision of equipment should be focused around minimising the risk of harm to people and the environment as result of a pollution incident, and for containing or controlling a pollution incident;
2. Implementation of Emergency Management Plan;
3. Provision of appropriate and sufficient Personnel Protective Equipment;
4. Onsite inductions for employees, contractors and suppliers;
5. Staff are trained in managing hazards that could result in an environmental incident as well as managing such an incident (refer Section 9.1); and
6. Regular (monthly) environmental inspections.

7.2 Spills Clean Up Procedure

The spill procedure will vary depending on the type of chemicals used on site.

Stop the source: If safe to do so, immediately stop the spill at the source. This may include righting a tipped container, plugging a hole or switching off a pump or compressor.

Contain and Control the Flow: If the spill is large, halt the spread of the spilled liquid with the large socks from the spill kit. Prevent the spill from entering the stormwater or sewerage drains by blocking the drain inlets. Cover spill with absorbent kitty litter granules from spill kit.

Clean up Spill Promptly: Using a broom from the spill kit sweep more kitty litter granules into the spill, then brush spill/granules into a dustpan and place in a plastic garbage bag(s). Clean up the remainder of spill using absorbent cloth and sponges. Be sure to use gloves and other PPE from the spill kit as required. The SDS should be consulted with regard to correct PPE**.** Place the used cleaning materials in the plastic garbage bags containing the spill/granule.

Disposal: Consult the SDS for relevant information. Collected chemical spills must be disposed of as hazardous waste.

Maintain a Log - Incident, Injury and Hazard Report Form: The WH&S Coordinator must keep a record of what, how and when it happened and who were the witnesses.

7.3 Evacuation Procedures

The evacuation procedures listed here are summarised from the site Emergency Management Plan.

The decision to evacuate due to an environmental incident will be made by Chief Warden, based upon the information received, and the nature of the emergency. Evacuation will depend largely on the type of emergency, the location and extent of the emergency, the safety of staff and visitors and the security of the building. Depending on the circumstances, a full or partial evacuation may be required.

Shelter in place is a process designed to protect people in the event of particular emergency situations that may present a higher risk to people should they move from the general workplace location.

The direction to commence sheltering in place may be made by the Chief Warden in the following situations that may impact the Chullora site; Dangerous Goods release, External Ammonia leak or any other incident.

Notification of a shelter in place event will be communicated by the Chief Warden by PA announcement from the Fire Control Room.

- ECO to move employees to the further safest point (lunchroom amenities area) from the specified hazard;
- Maintenance to shut down air handling systems as necessary;
- Securely close all doors and windows in the event of vapour or fuming releases;
- Establish communication using red WIP phones or hand held radios and report location, status and number of persons sheltering in place to Chief Warden;
- Ensure persons sheltering in place remain calm and advised;
- Do not allow persons to leave area of shelter in place unless advised by Chief Wardens or Emergency Services;
- If persons sheltering in place require special needs (medications, personal hygiene or other) liaise with Chief Warden and advise persons of advice received; and
- Be aware of stand down message or return to work message from Chief Warden over Public Announcement (PA) system.

8 Control Procedures

The following control procedures (management actions), have been summarised from the site Emergency Response Plan.

8.1 Spill Response

8.1.1 Hazardous Substance

On becoming aware of a spillage of a Hazardous Substance anywhere on site, (with the exclusion of an Ammonia leak),

Raise the alarm and notify the Chief Warden of; The type, nature & quantity of material spilt IF KNOWN. Do not approach any spillage to try to identify the spill.

Chief Warden will commence their role as Chief Warden and:

- Evaluate the need to evacuate the occupants.
- Notify the Fire Brigade & inform them of the type, nature & quantity of material spilt.
- Establish communications with ECO members
- Obtain Safety Data Sheets for the material spilt, (for the Fire Brigade)
- Arrange first-aid treatment where necessary
- If necessary evacuate personnel from dangerous areas.
- Consider shutting down any Air Handling system to potentially affected areas, to prevent the spread of fumes throughout the building.
- If the spill is of a minor Hydrocarbon nature, such as paints , thinners, turpentine, solvents, hydraulic fluids etc; ensure appropriately trained staff use provided spill kits to prevent any further contamination of people , property or the environment.
- If the spill is a minor chemical nature such as 15 to 20 litre drums contained in the site Dangerous Goods Depots, then consideration shall be given as to whether the Emergency Services Personnel are to be contacted. SDS's must be consulted prior to any containment / clean-up operations for this determination (PPE is the main consideration).
- If the spill is from a major depot (bulk storage) immediate priority is the movement of all persons to a safe place and notifying the Emergency Services.
- If a Liquid spill is involved use the Storm water isolation valves to contain the spill to the local area. (A list of the isolation valves is found in the Chief Wardens Checklist, and the Hazmat Information Box mounted on the Gatehouse wall.)

8.1.2 Delivery Vehicle

On becoming aware of a spillage of a chemical from a delivery vehicle anywhere on site, (with the exclusion of an Ammonia leak or major LPG leak).

Raise the alarm – contact the Chief Warden, and notify them of the following:

- The type, nature & quantity of material spilt IF KNOWN. Do not approach any spillage to try to identify the spill.
- Liaise with delivery vehicle driver and obtain Emergency Procedure Guide from the vehicles manifest.
- If the driver has no manifest, or any information on the chemicals being transported, then commence the actions below.
- DO NOT endanger persons by investigating the spill to ascertain if the product belongs to the site.

- If the driver has been contaminated by the spilled product, then isolate the driver from the vehicle and other persons and contact emergency services.
- If identification can be confirmed from a safe distance (and product is being delivered to the site) then obtain appropriate existing SDS and contact emergency services.
- If identification is confirmed that the spilled chemical is of a hydrocarbon based product, such as paints, thinners, turpentine, solvents, hydraulic fluids etc; then the procedure below applies.

8.1.3 Ammonia Leak Incident

There is Ammonia detection systems located throughout the site. They will continuously monitor ammonia gas concentrations. Sensing devices are installed in the roof cavity above.

The sensors will activate a two stage warning alarm when ammonia levels exceed the following concentration.

- Low Alarm 30PPM; or
- High Alarm 100PPM.

A Warning System will activate to alert Service Fitters of dangerous levels of Ammonia in the activated area and control entry accordingly.

On becoming aware of an Ammonia leak, raise the alarm and notify the Chief Warden of; the location of the leak IF KNOWN. Do not approach any leak to try to identify the spill.

Chief Warden will commence their role as Chief Warden and be able to understand, and implement the following actions;

For safety reasons, an ammonia alarm system has been installed at this site. A concentration of ammonia of 100ppm in the air is the limit, which will raise the alarm.

When the above ammonia concentrations are sensed the siren will sound and the one orange light outside the plant room will be activated.

This alarm requires immediate action. Persons with at least theoretical knowledge of managing an ammonia leak should immediately take charge of this emergency operation. These persons are Senior WHS Coordinator (**Ricardo Le**) or WHS Coordinator (**Nathan Mascherin** 0422 882 281).

In case of their absence on site, the following should be contacted Engineering Manager (**Omer Al Jumaily** 0437 737 005).

8.1.4 Gas Leaks

On becoming aware of a leak of Gas anywhere on site, (with the exclusion of an Ammonia leak),

Raise the alarm and notify the Chief Warden of:

The type, nature & quantity of material leaking IF KNOWN. Do not approach any spillage to try to identify the spill.

Chief Warden will commence their role as Chief Warden and;

- Evaluate the need to evacuate the occupants.
- Notify the Fire Brigade & inform them of the type, nature & quantity of material leaking.
- Establish communications with ECO members
- Obtain Safety Data Sheets for the material leaking, (for the Fire Brigade).
- Arrange first-aid treatment where necessary.
- If necessary evacuate personnel from dangerous areas.

- Consider shutting down any Air Handling system to potentially affected areas, to prevent the spread of fumes throughout the building.
- If the spill is of a Flammable nature, as identified by Dangerous Goods signage displayed on the vessel or line that is leaking, all operators to shut down any machinery and make it safe (if safe to do so). Evacuate the building by the nearest emergency exit, keeping clear of the danger area. Follow the directions of the "Wardens". Proceed to the assembly area nominated by the Chief Warden, up-wind of the leak.
- Stop all sources of ignition (i.e. welding, oxy plasma cutting, grinding).
- If the leak is from the natural gas lines (to Boiler Room) and it is safe to do so – Isolate the supply at the Emergency Isolation Point or at the Natural gas mains located outside the main gate.
- If the spill is from a major depot (bulk storage Oxygen & Carbon Dioxide) immediate priority is the movement of all persons to a safe place and notifying the Emergency Services. Be aware of the freezing properties of these gases and keep personnel away.

8.2 Wastewater Treatment & Effluent System

1. Various drains on site gravity drain to the main collection pit near the wastewater treatment plant (WWTP).
2. A duty and standby pit pump transfer wastes from the pit to the rotary screen inside the WWTP plant room.
3. Solids are collected in a bin under the screen.
4. Liquids gravity drain to the waste water balance tank behind the WWTP room.
5. The Balance tank water is transferred to the DAF inlet tank, by 2 transfer pumps, controlled by level sensors in the balance tank. One pump runs if the tank level is not high, 2 pumps run when it becomes high.
6. At the DAF inlet tank, chemicals are added to the water to convert the fine pollutants into larger particles for easy separation, and this water flows under gravity to the aeration section of the DAF.
7. At the aeration section of the DAF, fine air bubbles float the larger particles which are scraped off and the cleaned water gravity flows to the sewer discharge trough.
8. The clean water flows from the trough through a water meter, to the Sydney Water sewer network.
9. The sludge is transferred to a sludge pasteurisation system where it is heated to at least 100 ^{0}C, and then it is pumped through cooling pipes to the sludge holding tank.
10. The sludge is pumped from the holding tank to the belt press for dewatering.
11. The water extracted at the belt press gravity drains to a sump in the floor and is returned to the balance tank.
12. The dried sludge is conveyed along a series of belt conveyors to a sludge hopper and then is fed into sludge bins and ultimately to the sludge transport bin for pick up by licensed waste contractors.

8.3 Waste Management and Disposal

All expired, waste or spillage products shall be disposed of in accordance with NSW Environment Protection Authority (EPA) and Local Government legislation. Imported pig meat will be treated and disposed of in accordance with the Approved Arrangements Requirements.

Disposal of chemical substances is in accordance with the legislative requirements. Substances must not be disposed of inappropriately (e.g. into a sink or sewerage system). Substances accompanied by their current SDS must not be donated externally by Primo Foods, without the signed approval of senior management for that site.

8.3.1 General waste and recycling

General and specific waste contracts, which ensure that all waste / rubbish is removed from site.

On all sites general waste is collected at specific locations by cleaning staff.

A recycling program is a component of waste management.

Typical Waste	Process	Estimated quantities
Wet Plastic	land fill	5-6 Tonne per day
Dry Plastic	re-cycle	1 Tonne per day
Cardboard	re-cycle	170 tonne per month

Waste Water treatment cooked and stored and sealed in 10 m^3 bin

(Dry cake) compost- recycled 8 tonne per day-

8.3.2 Chemical / hazardous waste

A system for the collection, management and disposal of chemical waste exists and is the responsibility of Maintenance Manager of each site. Individual users of chemicals are responsible for the local management of such waste prior to its positioning at the chemical/oil stores, where waste is collected ready for disposal by contractor at an approved dumping site.

A valid Safety Data Sheet (SDS) is required to be supplied by Primo Foods to the licensed Waste Management Company contracted to do the disposal, as part of the normal disposal procedure.

Typical Waste	Process/storage area	Estimated quantities
Oil	Oil store	200 litres every 3 months
Ammonia oil	Drained daily into 1000 litre drums - Oil store	1000 litres every 3 months

Waste Contractors are certified and qualified to remove the hazardous waste from the site. A Waste Contractors register (refer Chullora Waste Management Plan) is available at each site.

8.3.3 Glass tubes-Fluorescent, HID, CFL, light Globes and LED lights

A system for the collection, management and disposal of glass (lamps) exists and is the responsibility of Maintenance Manager of each site. Individuals responsible for repairing/replacing and disposing lights must comply with the handling and disposal protocol.

The safe collection and recycling of mercury containing lamps is important in avoiding the serious impact of mercury entering the environment.

<u>Collection system</u>

All waste “lamps” are to be placed in cardboard sleeves or cardboard boxes prior to disposal.

All waste “lamps” are to be segregated into glass lamp collection waste bins for pick up by an approved waste contractor.

Workers changing, repairing and disposing of glass lamps must wear the appropriate PPE including safety eye wear and Safety gloves.

If a ladder, Platform Cherry Picker or Scissor Lift is required to remove the lamps the Working at Heights Procedures must be complied with (refer to PR-PRIMO-13-H).

<u>Acceptance Criteria</u>

- Compact Fluorescent Lamps;

- Fluorescent U-Tubes;
- Linear Fluorescent lamps;
- Mercury Vapour Lamps;
- Metal Halide Lamps;
- Sodium Vapour Lamps;
- UV lamps; and
- LED tubes.

Recycling (by the Waste Removal Contractor)

- Tubes and globes will be crushed and material will be sorted into individual components for resource recovery;
- Aluminium will be reused to manufacture new products;
- Glass is recycled into wool glass; and
- Mercury will be distilled from Phosphor powder and mainly used in dental amalgam.

8.4 Remediation

In the event of an Emergency incident, a thorough investigation into the symptoms and causes of the incident needs to be performed and documented.

For drills, the Emergency Response Incident Report shall document the extent of the drill and any recommendations arising from the drill.

Suitably qualified Contractors will be acquired to ensure any clean-up is done correctly to the appropriate standards. If the incident is sudden and unexpected there is insurance cover for such an event. If insurance does not cover the incident then the Repairs Maintenance budget will be utilised.

9 Training and Testing

9.1 Training

Ensuring all Primo staff at Chullora and contractors are aware of both their responsibilities for protecting the environment as well as responding correctly to any incident is important. To achieve these objectives training in the PIRMP will occur via the following processes:

I. All staff and contractors working at the site would be briefed on the PIRMP as part of their induction and briefing on emergency procedures; and

II. PIRMP training would occur as part of regularly scheduled toolbox talks.

The induction program would include details as to the Primo's environmental commitments, preventing pollution events and reporting of incidents. In addition, procedures to be followed to report and during an environmental incident would be detailed.

Additional scheduled training would be undertaken should a change in the contents of the PIRMP be made and/or following the outcomes of a review into the causation and responses to an environmental incident.

Records of those attending all training are maintained at the WHS department.

Training will occur:

1. On and during induction;
2. As a minimum every two months during tool box sessions; and
3. During annual testing processes.

9.2 Testing of PIRMP

This plan will be tested and reviewed at least once every twelve (12) months, or within one month of a pollution incident, to ensure that the information contained within the plan is accurate and up to date, and that the Plan is capable of being implemented in a workable and effective manner.

The review will consist of a desktop review of the content within this PIRMP to ensure accuracy. A review of the testing of the plan (i.e. emergency exercise) will be undertaken following each exercise to determine any required modifications to this PIRMP.

PIRMP Test Record

Method	Staff Members	Incident Type	Date
Post incident assessment	Troy White, Natasha Smith, Omer Al Jumaily, Adrian Lister, Minh Nguyen	Assessment including whether the PIRMP was implemented efficiently, communication protocols followed and opportunities for improvement	30.11/2022

9.3 Updating PIRMP

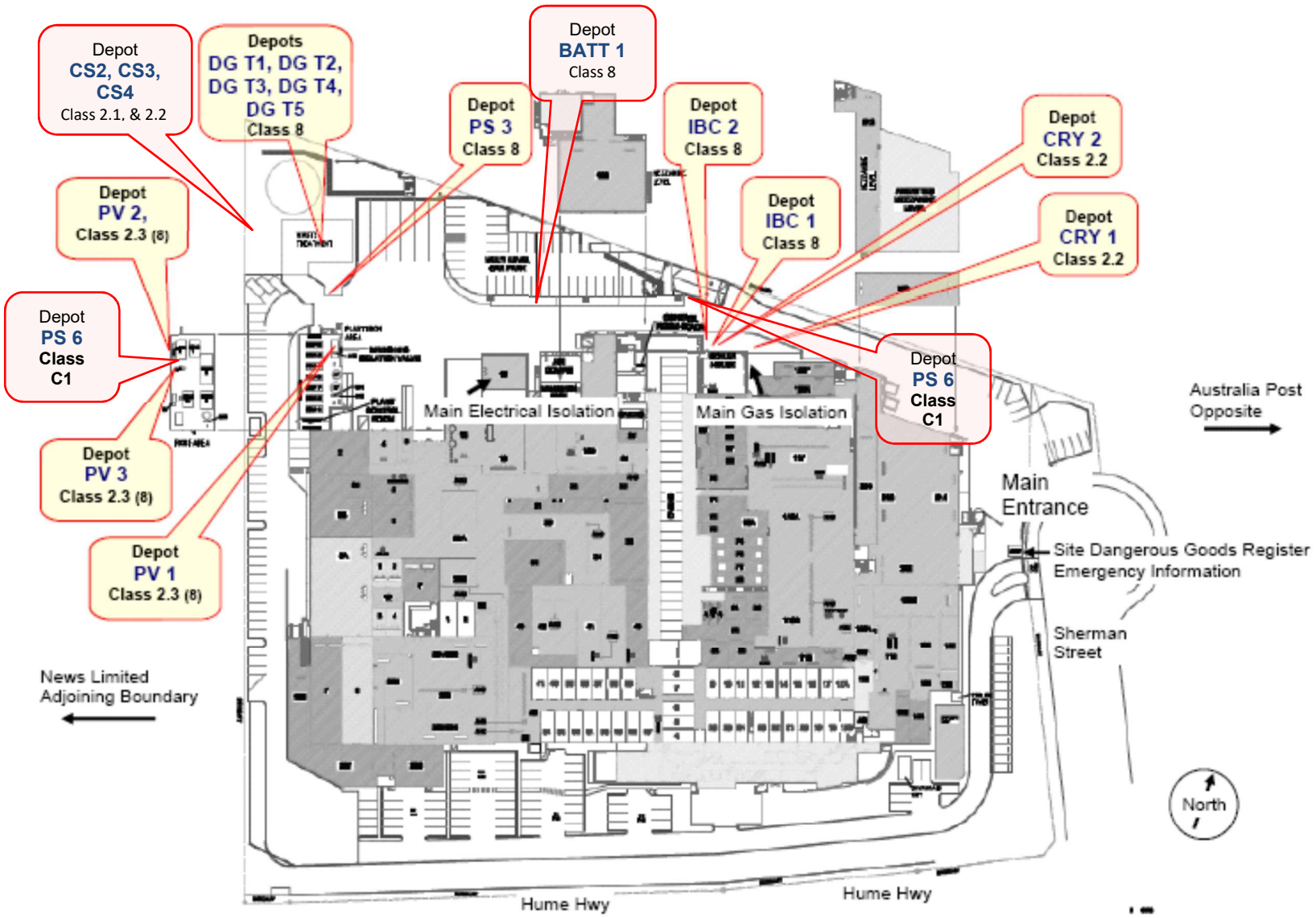
This PIRMP will be updated depending on the results and outcomes of the testing procedures (as described above) as well as following reviews of any environmental incident.

A review of the PIRMP will occur every 12 months commencing from the date of authorisation by Primo. Contact details in this document must be keep current at all times; and updated during each review.

Appendix A – Site Maps

Please note that Australia Post (North side of site marked “A”), has since expanded and now utilises the vacant area adjacent to the original building.

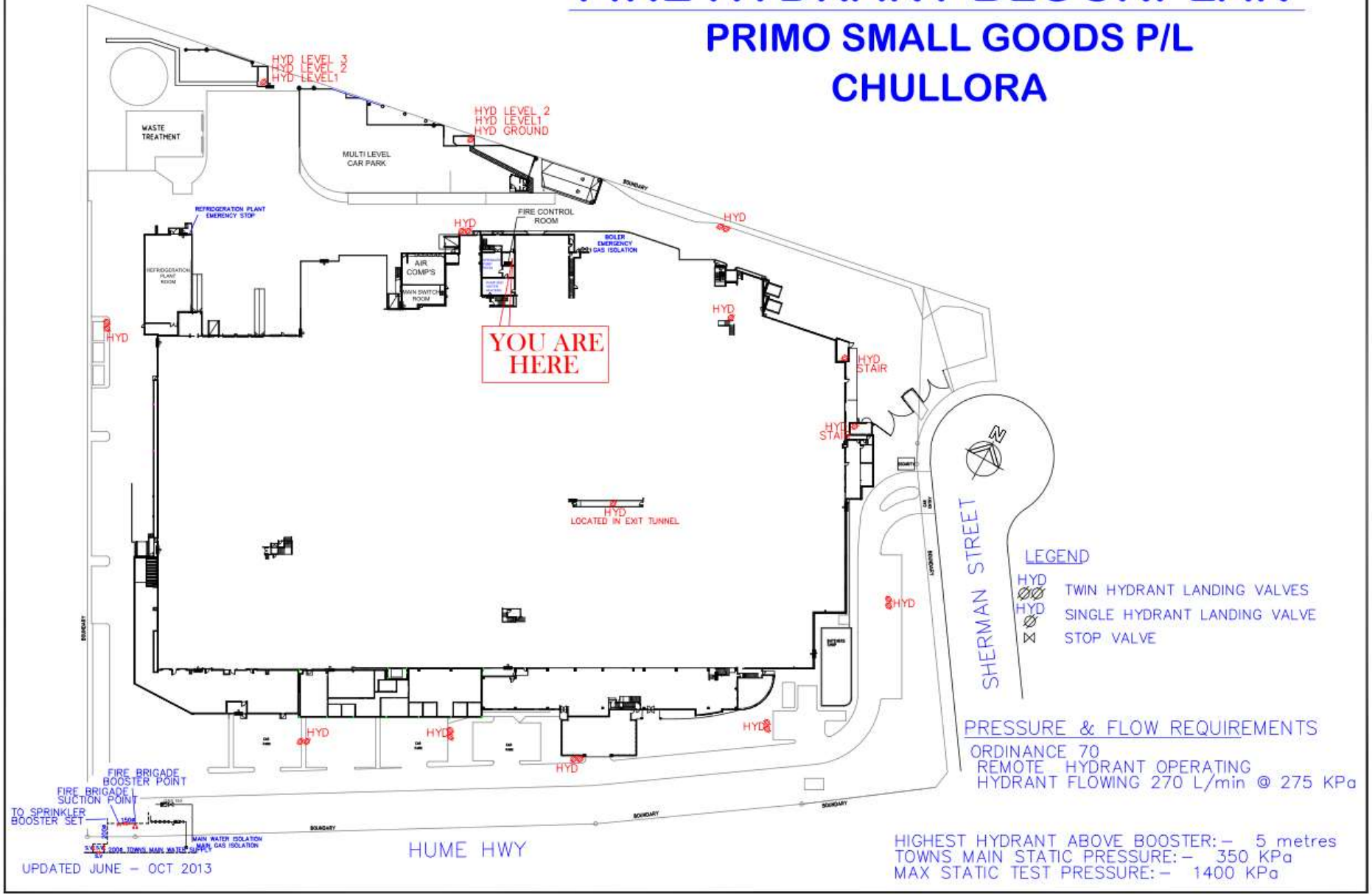
DANGEROUS GOODS DEPOT NSW WORKCOVER NOTIFICATION – SITE PLAN



FIRE HYDRANT BLOCKPLAN

PRIMO SMALL GOODS P/L

CHULLORA



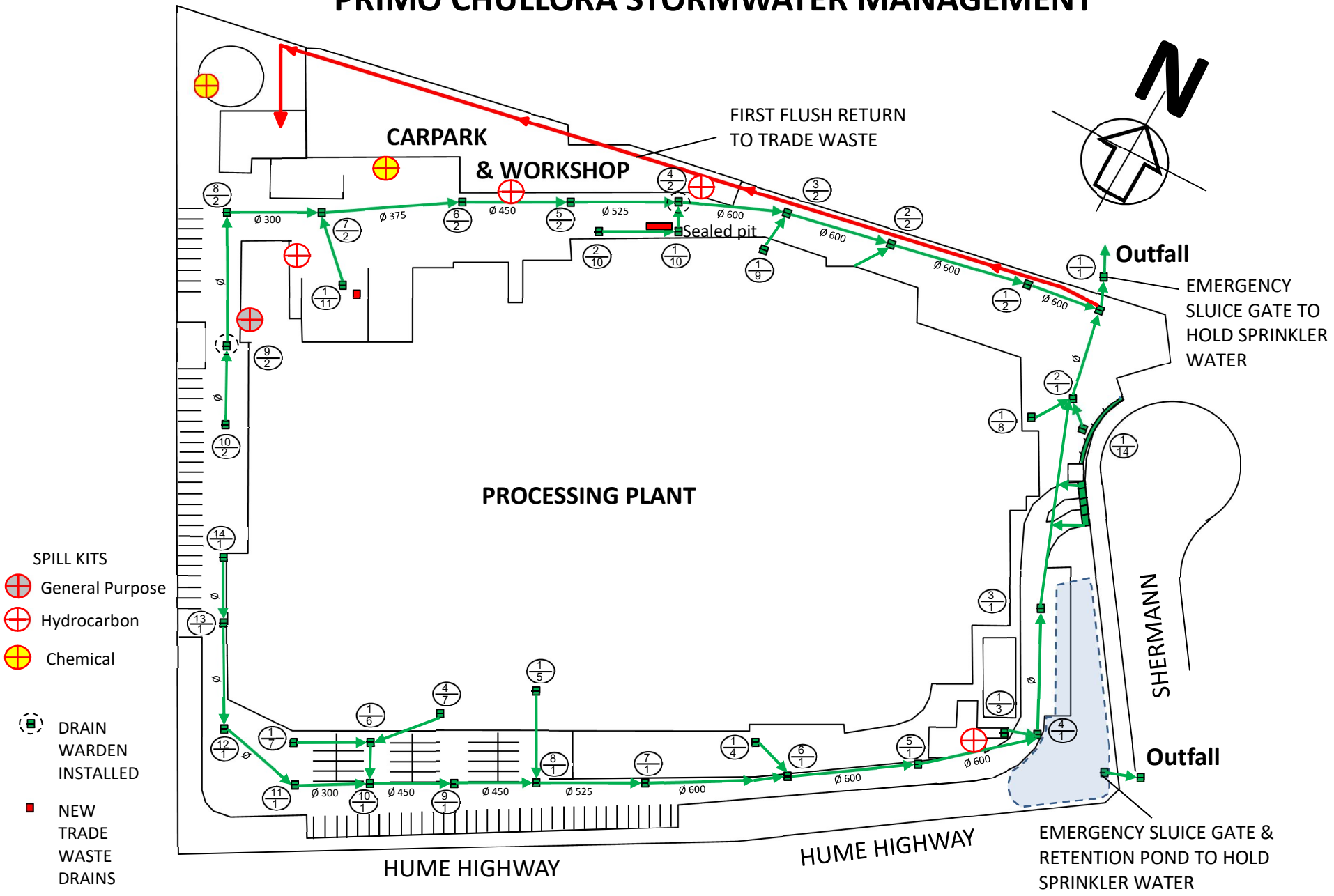
PRESSURE & FLOW REQUIREMENTS

ORDINANCE 70
REMOTE HYDRANT OPERATING
HYDRANT FLOWING 270 L/min @ 275 KPa

HIGHEST HYDRANT ABOVE BOOSTER:– 5 metres
TOWNS MAIN STATIC PRESSURE:– 350 KPa
MAX STATIC TEST PRESSURE:– 1400 KPa

UPDATED JUNE – OCT 2013

PRIMO CHULLORA STORMWATER MANAGEMENT



Appendix B – Environmental Risk Assessment and Plan

Risk Assessment for Site Environmental Hazards Reviewed January 2023

Step 1: Determining Significant of Environmental Hazard or Incident

a. Using the "Environmental Significance and Risk Assessment Tool" and without taking into consideration any existing/established risk control measures; assign a rating value (1 to 4) for each environmental impact from the following categories:

ENVIRONMENTAL SIGNIFICANCE & RISK ASSESSMENT TOOL					
Applicable to the evaluation of Significant Environmental Impacts				Applicable only to Risk Level evaluation	
RATING:	**SCALE:** (Volume of discharge or usage/ Cost)	**SEVERITY:**	**SENSITIVITY:**	**CONTROL RATING:**	**PROBABILITY: (With existing Controls in place)**
1	Insignificant	No detectable change to the environment, internally contained	No complaints, no perceived legal / community threat	Fully Controlled	Rare/Remote – theoretically possible, has not occurred
2	Low	Reversible, internally contained requiring clean-up, short term change to the environment	Employees / neighbour / community concern / potential legal exposure – FIRB referral to JBS Legal	<75% Effective Controls	Unlikely – not expected, has not occurred in the past 10 years
3	Medium	Reversible change to the environment, off-site release (accidental or uncontrolled) – FIRB referral to JBS Legal	Community / local media attention / legal exposure (e.g. breach of license) / Non-Compliance with JBS Policy – FIRB referral to JBS Legal	<50% Effective Controls	Possible - Likely – potential to occur multiple times per year
4	High	Irreversible change to the environment, uncontrolled off-site release – FIRB referral toJBS Legal	National media attention / legal exposure / Non-Compliance with JBS Policy – FIRB referral to JBS Legal	<25% Effective Controls	Almost Certain – known to occur

b. Any new rating shall be reflected in the sites Environmental Aspects and Impacts Register

c. Multiply the corresponding rating values to obtain a **Significance Score** which will be used to determine **Significant Environmental Impacts**. Record the Significance Score on the register and use the rating legend below to determine the level of significance. Record this decision in the register.

Significant Environmental Impact Rating Legend:	
64 to 12	**SEI, Significant Environmental Impact**
11 to 1	EI, Environmental Impact

Step 5 – Determining the Risk Associated with each Significant Environment Impacts

a. For this risk assessment all existing risk control measures associated with the impact are taken into consideration

b. Use the "Environmental Significance and Risk Assessment Tool" again to determine a value (1 to 4) for the "Control Rating" and "Probability" factors. Enter these values into the Environmental Aspects and Impacts Register.

c. Work out the **Risk Score** associated with the impact by multiplying the "Control Rating" by the "Probability" rating and then by the value of the Significance Score (i.e. Control Rating x Probability x Significance Score = Risk Score). Enter this value into the Environmental Aspects and Impacts Register.

Example:

Evaluation of Environmental Risk (refer CEMS 6.1.1_AI)	Scale	Severity (Rating of 3 or 4 to be referred to JBS Legal (FIRE))	Sensitivity (Rating of 2, 3 or 4 to be referred to JBS Legal (FIRE))	Significance Rating (1-11 (EI) / 12 – 64 (SEI))	Control	Probability	Risk Rating (1-128 (LR) / 129-431 (MR) 432-1024 (HR))
	2 X	3 X	1 =	6 EI X	3 X	4 =	72 LR

d. Use the Priority/Risk Rating Legend below to determine a priority rating. Record this value in the Environmental Aspects and Impacts Register and also use it to determine whether an Objective is required for each Significant Environmental Impact.

Priority / Risk Rating Legend:	
1024 to 432	**HR**, high/significant risk; urgent management Objective needed
431 to 129	**MR**, medium/moderate risk; management Objective with a reasonable time frame
128 to 1	**LR**, low risk; no action required except reviewed annually

Example from Environmental Aspects and Impacts Register

ENVIRONMENTAL ASPECTS AND IMPACTS REGISTER

JBS Australia Pty Limited
Primo Chullora

Date of Issue: 29/12/2022
Document Number: CHU_EMP_6.1_AI

				ENVIRONMENTAL		ASSESSMENT OF SIGNIFICANT ENVIRONMENTAL IMPACT					RISK ASSESSMENT						LEGAL AND OTHER OBLIGATION
REF	SECTION	TEAM	ACTIVITY	ASPECT:	IMPACT:	SCALE	SEVERITY	SENSITIVITY	SIGNIFICANCE	SIGNIFICANCE (TWO LEVEL EI)	CONTROL	PROBABILITY	RISK	RISK RATING (HR, MR, LR)	CONTROLS and or Mitigation measures	ASSESSMENT DISCUSSION NOTES	OBLIGATION
7.1	Production	Manufacturing Production	Vacuum System Operation	Spill - Non Hazardous Substance	Contamination - Soil	2	2	2	8	EI	2	3	48	3-LR	The Brine in transported using internal pipes. When the system is outside area is fully sealed	The pumping of brine solutions if not controlled could lead to the contamination of soils.	Protection of the Environment Operations Act 1997 Contaminated Land Management Act 1997
7.13	Production	Manufacturing Production	Ventilation System Operation	Atmospheric Emissions - Odour	Environmental Nuisance - Odour	2	2	2	8	EI	2	3	48	3-LR	Operators operate the ovens in accordance with specifications, Ventilation has filters	The use of ovens generates atmospheric emission of odour. Location of plant has separation from sensitive receptors	Protection of the Environment Operations Act 1997
7.14	Production	Manufacturing Production	Ventilation System Operation	Noise Generation	Environmental Nuisance - Noise	2	2	2	8	EI	2	3	48	3-LR	The ventilation system is built to specific standards, Plant is located with separation from sensitive receptors	The ventilation system generates noise, system is regularly serviced and maintained on a set schedule	Protection of the Environment Operations Act 1997
8.02	Warehouse	NSW dist Centre	Truck Operations	Atmospheric Emissions - Dust and Particulate Matter	Environmental Nuisance - Contamination Air/Atmosphere	2	2	2	8	EI	2	3	48	3-LR	Trucks driven primarily on sealed areas, and travel at lower speeds in unsealed areas	Trucks have the potential to generate dust and particulate matter that could impact the air quality of sensitive receptors	Protection of the Environment Operations Act 1997
9.05	Engineering	Facilities	Waste Water Treatment	Hazardous Substance Storage	Contamination - Soil	2	2	2	8	EI	2	3	48	3-LR	Waste water treatment plant is located on sealed areas, main plant located indoors or undercover	The waste water treatment plant will experience failures where leaks and spills occur. If these are not managed appropriately soil contamination may occur	Protection of the Environment Operations Act 1997 Contaminated Land Management Act 1997
9.07	Engineering	Facilities	Waste Water Treatment	Hazardous Substance Use	Contamination - Soil	2	2	2	8	EI	2	3	48	3-LR	Hazardous substances are stored in bunding, spill kits available, staff trained in chemical use, staff trained in spill kit use	The waste treatment process utilises caustic and acid to manage the pH to improve the treatment process. If the use of the hazardous substances does not occur in a controlled manner soil contamination may occur	Protection of the Environment Operations Act 1997 Contaminated Land Management Act 1997
8.07	Warehouse	NSW dist Centre	Truck Storage	Noise Generation	Environmental Nuisance - Noise	3	3	2	18	SEI	1	2	36	3-LR	Trucks are regularly maintained, surface is sealed, separation from sensitive receptors. 10km/h posted speed limit, with speed bumps around site to slow traffic.	The operations of trucks being stored at the premises generates noise. If this process is not controlled adverse impacts to sensitive receptors may be observed	Protection of the Environment Operations Act 1997
4.54	Engineering	Facilities	Boiler Operations	Noise Generation	Environmental Nuisance - Noise	2	2	3	12	SEI	1	3	36	3-LR	Boiler contained in a shed at rear of premises. Boiler Certified Vessel, Routine maintenance	The boiler generates noise, sensitive receptors within 200m	Protection of the Environment Operations Act 1997

Appendix C – List of Potential Pollutants on Site

Summary of Dangerous Goods Classes on this Site:

Class of Dangerous Goods	Packaging Group	Quantity
Class 2.1	n/a	2980 litres
Class 2.2	n/a	5600 litres
Class 2.2 (5.1)	n/a	1700 litres
Class 2.3 (8)	n/a	9000 litres
Class 3	PG III	280 litres
Class 5.1 (8)	PG II	320 litres
Class 8	PG II	27170 litres
Class 8	PG III	4760 litres
Class 9	PG III	310 litres
C1 Combustibles	n/a	3000 litres

Minor Depots - Packaged Goods:

Depot	Location	Product name(s)	UN No.	Class	Sub Risk	PG	Max Capacity
PS 1	Ammonia Plant	Corrosive Liquid NOS	1760	8	n/a	II	300 litres
		Environmentally Hazardous Substance NOS	3082	9	n/a	III	100 litres
		Refrigeration Oils	None allocated	C2	n/a	III	400 litres
PS 2	Boiler Room	Sodium Hydroxide	1824	8	n/a	II	250 litres
PS 3	Trade Waste	Corrosive Liquid Acidic Inorganic NOS	3264	8	n/a	II	2250 litres
PS 4	Trade Waste Cage	Sodium Hydroxide (Solid)	1823	8	n/a	II	400 kgs
		Oxidizing Liquid, Corrosive NOS	3098	5.1	8	II	200 litres
		Disodium Trioxosilicate	3253	8	n/a	III	125 kgs
PS 5	Slice pack store	Oxidizing Liquid, Corrosive NOS	3098	5.1	8	II	320 litres
FC 1	Oil store Flammable Liquid Cabinet 1	C1 Combustible Liquids	n/a	C1	n/a	n/a	3000 litre
		Turpentine Substitute	1300	3	n/a	III	250 litres
		Thinners	1263	3	n/a	II	50 litres
FC 2	Oil store Flammable Liquid Cabinet 2	Thinners	1263	3	n/a	II	120 litres
		Aerosols	1950	3	n/a	III	20 litres
		Paints	1263	3	n/a	III	50 litres
PS 6	Cooked side Laundry & Store	Sodium Hydroxide Solution 30%	1824	8	n/a	II	150 litres
		Environmentally Hazardous Substance Liquid NOS	3082	9	n/a	III	150 litres
		Hypochlorite Solution	1791	8	n/a	III	40 litres
		Disodium Trioxosilicate	3253	8	n/a	III	100 kgs
PS 7	Raw side Laundry	Sodium Hydroxide Solution 30%	1824	8	n/a	II	15 litres
		Hypochlorite Solution	1791	8	n/a	III	20 litres
		Disodium Trioxosilicate	3253	8	n/a	III	40 kgs
		Environmentally Hazardous Substance Liquid NOS	3082	9	n/a	III	15 litres
PS 8	Raw side Laundry Store	Disodium Trioxosilicate	3253	8	n/a	III	80 kgs
		Sodium Hydroxide Solution 30%	1824	8	n/a	II	45 litres
		Hypochlorite Solution	1791	8	n/a	III	60 litres
		Environmentally Hazardous Substance Liquid NOS	3082	9	n/a	III	45 litres

Depot	Location	Product name(s)	UN No:	Class	Sub Risk	PG	Max Capacity
PS 9	Laboratory	Ethanol	1170	3	n/a	III	30 litres
		Silver Nitrate	1760	8	n/a	II	2 litre
		Sulphuric Acid	1830	8	n/a	II	20 litres
		Acetic Acid 75%	2790	8	n/a	III	80 litres
		Potassium Chromate	3288	6	n/a	II	1 kg
		Sodium Nitrate	1500	6	5.1	III	1 kg
PS 10	Cooling Tower Adjacent to Butchers Shop	Corrosive Liquid Acidic organic NOS	3265	8	n/a	III	80 litres
		Environmentally Hazardous Substance NOS	3082	9	n/a	III	100 litres
CS 1	O/S Fire Control Room	LPG Compressed	1075	2.1	n/a	n/a	220 litres
CS 2	Engineering External store	LPG Compressed	1075	2.1	n/a	n/a	1000 litres
		Industrial Acetylene	1001	2.1	n/a	n/a	1045 litres
CS 3	Engineering External store	Industrial Oxygen	1072	2.2	5.1	n/a	1320 litres
		Compressed CO2 / O2 Mixture	1014	2.2	5.1	n/a	700 litres
CS 4	Engineering External store	Argon Welding gas	1006	2.2	n/a	n/a	400 litres
		Nitrogen Compressed	1066	2.2	n/a	n/a	400 litres
IBC 1	Mobile IBC	Hydrochloric Acid	1789	8	n/a	II	1000 litres
IBC 2	Mobile IBC	Hydrochloric Acid	1789	8	n/a	II	1000 litres
BATT 2	Floor Cleaner recharge Area	Sulphuric Acid	2794	8	n/a	III	100 kg

Major Depots - Bulk storage:

Depot	Location	Product Name	UN No:	Class	Sub Risk	PG	Max Capacity
PV 1	Ammonia Plant Liquid receiver	Anhydrous Ammonia	1005	2.3	8	n/a	6000 litres
PV 2	Rooftop Plant Priming Vessel	Anhydrous Ammonia	1005	2.3	8	n/a	1500 litres
PV 3	Rooftop Plant Liquid receiver	Anhydrous Ammonia	1005	2.3	8	n/a	1500 litres
CRY 1	Boiler Room Deck	Liquid Nitrogen	1977	2.2	n/a	n/a	2500 litres
CRY 2	Boiler Room Deck	Liquid Carbon Dioxide	2187	2.2	n/a	n/a	2500 litres
DG T1	Trade Waste	Sodium Hydroxide	1824	8	n/a	II	10000 litres
DG T2	Trade Waste	Sulphuric Acid	1830	8	n/a	II	5000 litres
DG T3	Trade Waste	Sodium Hydroxide	1824	8	n/a	II	2700 litres
DG T4	Trade Waste	Caustic Alkaline Liquid NOS	1719	8	n/a	II	2700 litres
DG T5	Trade Waste	Caustic Alkaline Liquid NOS	1719	8	n/a	II	1500 litres
BATT 1	Forklift Battery Recharge Area	Sulphuric Acid	1830	8	n/a	II	5875 litres
PA 1	Ammonia plant room	Ethylene Glycol	None allocated	C1	n/a	II	1200 litres
PS 6	Oil store	C1 Combustible Liquid	None allocated	C1	n/a	n/a	4000 litres

There are NO loaded vehicles kept on this site.

Appendix D – Publicly Available Information

This Appendix has been prepared for the purposes of online publication of requirements relating to the site Pollution Incident Response Management Plan.

It contains a direct reproduction of content drawn from the Pollution Incident Response Management Plan though has been modified to exclude personal information within the **meaning of the *Privacy and Personal Information Act 1998.***

Contacting Relevant Authorities to Notify a Pollution Incident

Only complete Step 1 followed by Step 2 if there is an immediate threat to human health or property. If not, complete Step 2 only. All agencies in Step 2 must be contacted, regardless of incident type. For example, Fire and Rescue must be contacted even if there is no fire.

Step 1

External Body	Phone Contact Details	Notification Record		
		TIME / DATE of notification	NAME of Person Notified	Initial Advice / Comment
1. Emergency Services (Fire and Rescue, Police, Ambulance Services)	**000** *Only call 000 first if there is an immediate threat to human health or property.*			

Step 2 - Proceed with the following notifications **in the order provided.**

2. EPA	**131 555** *Quote EPL Licence No. 6252*			
3. NSW Fire and Rescue	**1300 729 579**			
4. Liverpool public health unit	**(02) 8778 0855**			
5. The WorkCover Authority	**13 10 50**			
6. Canterbury Bankstown Local Council	**(02) 9707 9000**			
7. Primo Security	**(02) 9742 0159**			

Notification of Immediate Neighbours

Implement this section where a need to notify has been determined and:

- potential effects of the pollution incident are considered to be localised to immediate site neighbours; or
- potential effects of the pollution incident are considered to be widespread and applicable to the general community.

The site is located at Hume Highway, Chullora NSW 2190.

Table 3 lists nearby land uses which lie within immediate proximity of the site operating facilities. In the event of a pollution incident occurring, consideration needs to be given to notifying the premises occupiers where it is deemed that the pollution incident may put those premises or the occupiers at risk. Any notification made should seek to provide where possible detail regarding any possible controls that may assist such as closing windows and doors.

Table 3 – Land uses within close proximity to Sydney Steel Mill Rooty Hill operations

Direction	Owner	Description of land use	Contact details
North & northwest	Australia Post	Postal delivery service	13 76 78
East	Noble Toyota	Car dealership	(02) 8017 1713
South	News Limited	Paper printer	(02) 9288 1828
West	Spicers Paper Company	Industrial warehouse	(02) 9735 2666

Notification of Community

Implement this section where a need to notify has been determined and:

- potential effects of the pollution incident are considered to be widespread and applicable to the general community.