



Pollution Incident Response Management Plan

Last revised 28th February 2017

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1.0 Background

The introduction of new requirements under the Protection of the Environment Legislation Amendment Act 2011 (POELA Act) sets out specific requirements for all businesses holding a current Environment Protection Licence. These requirements include the preparation, keeping, testing and implementing of a Pollution Incident Management Response Plan

2.0 Scope

The scope of this Pollution Incident Response Management Plan (PIRMP) is to comply with the NSW *Protection of the Environment Operations Act 1997 section 153* and the *Protection of the Environment Operations (General) Regulation 2009*, to prepare, keep, test and implement a PIRMP.

This PIRMP has been formatted in accordance with the guidance material provided by the EPA. This PIRMP covers the following businesses, which are all wholly owned by Tox Free Limited (ASX – TOX) two (2) sites:

- Tox Free Australia Pty Ltd – 40 Christie Street, St Marys NSW 2760
- Tox Free Australia Pty Ltd — 66 Links Road, St Marys NSW 2760

Trading Name	Legal Entity	Address	ABN	EPA Licence
Tox Free Australia Pty Ltd	Tox Free Australia Pty Ltd	40 Christie St, St Marys NSW 2760	31 127 853 561	12628
Tox Free Australia Pty Ltd	Tox Free Australia Pty Ltd	40 Christie St, St Marys NSW 2760	31 127 853 561	7263
Tox Free Australia Pty Ltd	Toxfree (NSW) Pty Ltd	66 Links Rd, St Marys NSW	31 127 853 561	12943

This plan overlaps certain other documents that form part of the Toxfree Quality, Environmental and Safety Management System (QUEST) & Certified by Lloyds & SAI Global. These include:

- Toxfree HSEQ Risk Profile
- ESM1R10S – Emergency Contact List
- ESM1R11S – Emergency Response Plan
- ESM1R23S – Site Manifest

3.0 Description and Likelihood of Hazards [Clause 98C (1)(a) & (b)]

3.1 Environmental Risk Table

ACTIVITY	ENVIRONMENTAL RISK RANKING	LEVEL OF RISK
Balcan Lamp Crusher emission to air (Phosphor or mercury)	6x8=48	High Risk
Major Contract Weekend Collections Spills of wastes to stormwater, land or emissions to air	5x8=40	High Risk
Waste Handling spills	5x5=25	Moderate Risk
Drum Decanting (Non Hazardous Chemicals) spills to stormwater	5x5=25	Moderate Risk
Flammable Storage Area (outside main warehouse) Spills	5x5=25	Moderate Risk
Storage and Handling Spill to stormwater	5x5=25	Moderate Risk
Oxidizer Storage Spill to stormwater or adverse reaction causing air emission	3x8=24	Moderate Risk
Transport spill to environment or emission to air	3x8=24	Moderate Risk
Maintenance spill to stormwater	3x8=24	Moderate Risk
Off-site works spill to ;land or stormwater during offsite hazardous waste collections	3x8=24	Moderate Risk
Fire Extinguisher Decanting Spill to stormwater	3x5=15	Low Risk
Acid and Alkaline Storage spill to stormwater	3x4=12	Low Risk
Laboratory Chemical Sorting emission to air from incompatible chemicals coming into contact	3x4=12	Low Risk
Elephants Foot drum crusher leak to stormwater or land	3x3=9	Low Risk

3.2 Human Health Risk Table

ACTIVITY	SAFETY RISK RANKING	LEVEL OF RISK
Acid and Alkaline Storage leak to stormwater and exposure to people	5x10=50	Extreme Risk
Off-site works emission to air, land or surface waters resulting in human exposure	6x8=48	High Risk
Balcan Lamp Crusher emissions to air (Phosphor and/or mercury) resulting in human exposure	6x8=48	High Risk
Laboratory Chemical Sorting emissions to air or stormwater system resulting in human exposure	6x8=48	High Risk
Major Contract Weekend Collections emissions to surface waters, air or land resulting in human exposure	5x8=40	High Risk
Flammable Storage Area (outside main warehouse) emissions to air or stormwater resulting in human exposure	5x8=40	High Risk
Oxidizer Storage emissions to stormwater or air resulting in human exposure	5x8=40	High Risk
Storage and Handling emissions to air, water or land resulting in human exposure	5x8=40	High Risk
Waste Handling emissions to land, air or stormwater resulting in human exposure	6x5=30	High Risk
Drum Decanting (Non Hazardous Chemicals) emissions to stormwater or air resulting in human exposure	5x5=25	Moderate Risk
Fire Extinguisher Decanting emissions to air or stormwater resulting in human exposure	5x5=25	Moderate Risk
Transport emission to air, land or surface waters resulting in human exposure	3x8=24	Moderate Risk
Maintenance emission to land, surface waters or land resulting	3x8=24	Moderate Risk
Elephants Foot drum crusher emission to air or stormwater resulting in human exposure	3x3=9	Low Risk

4.0 Action and Control [Clause 98C(1)(c)]

Action and Controls for each identified Hazard can be found in the site Aspects and Impacts Register ESM1R1S and the Toxfree QUEST system.

4.1 Pre-emptive Controls

Each site has the following:

- Storm-water shut-off valves located at the stormwater outlet.
- Storm water / fire water retention
- Back-to-Base Alarm system
- Certified Fire Panels (registered through Penrith Council)
- Segregated Storage areas for Dangerous Goods
- Up-to-date manifest of Dangerous Goods
- Staff trained in Spill Response + Dangerous Goods Handling
- Staff trained in First Attack Fire Fighting

4.2 Safety Equipment [Clause 98C (1)(f)]

The site has safety equipment and infrastructure in place to manage environmental and human health risks posed by site operations. The safety equipment and infrastructure is suitable for both pollution and emergency incidents.

Safety equipment utilised across the two sites include the following:

- Fire Extinguishers (3 Types)
 - Water – located in warehouses and office areas
 - Foam – Warehouse areas only
 - Dry Powder – Flammable Liquid Storage areas & transport vehicles
- Hose reels
 - Christie St – three (3) locations within the main warehouse and one (1) external. Two (2) with foam attachments
 - Links Rd – four (4) external. Two (2) of four with foam attachments
- Fire Hydrants
 - Christie St – hydrants suitable for use by NSWFB available at the South and North West of the property
 - Links Rd – no known hydrants on site
- Personal Protective Equipment (PPE)
 - Multi-level PPE available including Self Contained Breathing Apparatus available at both sites
- Spill Kits – located throughout both facilities in strategic locations

In addition, Toxfree (Chemsal) Pty Ltd has been taken over by Tox Free Solutions and is in the process of implementing a number of controls and checks and balances at the site to ensure environmental compliance is achieved. These controls include:

- Revised Environmental and Dangerous Goods risk profiles at the site.
- Detailed environmental and dangerous goods compliance plans based on site licenses.
- Periodic site environmental and dangerous goods audits
- Periodic environmental and dangerous goods audit reviews
- Site based management plans including site environmental monitoring plan
- Safety Data Sheets (SDS). These are electronically available at the site
- Implementation of the observation reports system which requires reporting and actions of any environmental risk or incident
- Implementation of incident reporting and follow up for any significant environmental issues

The Pollution Incident Response Management Plans will be included in the Emergency Response Plan.

5.0 Inventory of Pollutants [Clause 98C(1)(d) & (e)]

Toxfree (Chemsal) is a hazardous waste collection and disposal company. The types and quantities of hazardous material stored at each site are described in each of the WorkCover Notification of Dangerous Goods. These documents are under each of the individual site sections, which also include a location map and details relating to Neighbour contacts.

- Appendix 1 – Christie Street
- Appendix 2 – Links Rd

A complete manifest of material stored at each of the sites can be found in Emergency Site Manifest. This manifest is updated each month or when manifested quantities have changed.

6.0 Contact Details [Clause 98C(1)(g) & (h)]

The following contacts relate to contacts which are utilised across both NSW sites. Site Specific contacts will be located in the specific Appendix for each site to ensure there is no confusion.

Name	Role	Contact
NSW Fire & Rescue	Emergency Service	000
Police	Emergency Service	000
Ambulance	Emergency Service	000
NSW EPA	Environmental Regulator	131 555
Toxfree (main office)	Business owner	02 9851 4200
Jesse Brown	Business Unit Manager	0477 366 396
Aaron Hajinakitas	Operations Manager	0409 006 864
Steven Kelly	Chief Warden – Christie St	0407 017 823
Stewart Pearson	Chief Warden – Links Road	0439 977 011
Lisa Gatt	Toxfree HSEQ Manager	0411 123 868
Security Control Room	Security	03 9331 0110

7.0 Communicating with Neighbours & the Local Community [Clause 98C(1)(i)]

The two sites which Toxfree operate within the St Marys region are located within heavily industrial zone.

A list of neighbours and contact details, local to each site, is located within each Appendix for the applicable site.

The following information provides approximate distances to residential areas located in proximity to each site, in consideration of potential air emissions:

- 40 Christie Street
 - 3km east
 - 7km south west
 - 8km west

- 7km south
- 6km north
- 66 Links Road
 - 5km east
 - 6km south east
 - 10km north
 - 8km west

8.0 Minimising Harm to Persons on the Premises [Clause 98C(1)(j)]

Each site has a number of mechanisms to detect risks and alert staff to incidents at the site so control, containment and remedial action can be instigated. These controls include:

8.1 Activation of Alarms

8.1.1 Raising the Alarm

- All staff members can activate the site alarm that indicates that evacuation is required.
- All staff are trained in site operations
- All staff are in a position where training would be able to assist in judging the direness of a situation and if evacuation would be required.
- Should a staff member determine that evacuation of the site is required, they would set off the alarm.
- On evacuation the staff member who has set off the alarm would report to the emergency controller at the muster point, and detail the situation. *This would occur in all cases requiring evacuation.*

If site evacuation is not required, a manager will be contacted in order to report the emergency.

8.1.2 Manual Activated

Manually activated alarms are located in the main office and on the western wall of the warehouse at Christie St.

Links Rd has manually activated buttons located both inside and outside the main office complex. These are push button type and are indicated by the signage **Emergency Alarm**. The activation of the emergency alarm will result in a site evacuation.

8.2 Automatic Detection Systems

There are four (4) automatic detection systems in use at the site.

1. Smoke detection in the front office (Links Rd & Christie St)

Upon the detection of smoke in the main office the site evacuation alarm will sound.

2. The second is a cyanide detector located in the main warehouse. (Christie St ONLY) *Upon the detection of cyanide in the warehouse the site evacuation alarm will sound.*
3. The third is thermal detection within the warehouse. (Links Rd & Christie St) *Upon the detection of heat in the warehouse the site evacuation alarm will sound.*
4. The fourth is a chlorine detector located in the main warehouse. (Christie St ONLY) *Upon the detection of chlorine in the warehouse the site evacuation alarm will sound.*

9.0 Protocol for Notification of Pollutions Incidents [Clause 98C(1)(I)]

We are now required to report pollution incidents immediately instead of “as soon as possible” (Section 148 POEO Act)

The following procedure for notification is to be followed. (Also refer to the 24 hour contact details previously advised in No. 6)

PROTOCOL for Industry Notification of Pollution Incidents

Call **000** if the incident presents an immediate threat to human health or property.

If an initial combat agency is not required you must notify the Appropriate Regulatory Authority (ARA) in the following order:

EPA	131 555
The Ministry of Health (Penrith Office)	(02) 4734 2022
<i>(via local Public Health Unit – these number are listed below)</i>	
WorkCover Authority	13 10 50
Penrith Council	(02) 4732 777
Fire & Rescue NSW	000
NSW State Emergency Services	132 500
NSW Rural Fire Service	1800 679 737

9.1 Local Health Units

9.1.1 Metropolitan NSW Local Health Districts

Local Health District	Contact Number
Central Coast	02 4320 2111
Illawarra Shoalhaven	02 4222 5000
Nepean Blue Mountains	02 4734 2000
Northern Sydney	02 9926 6314
South Eastern Sydney	02 9540 7756
South Western Sydney	02 9828 6000
Sydney	02 9515 9600
Western Sydney	02 9845 9900

9.1.2 Rural & Regional NSW Local Health Districts

Local Health District	Contact Number
Far West NSW	02 8080 1333
Hunter New England	02 4921 3000
Mid North Coast	02 6588 2946
Murrumbidgee	1300 066 055
Northern NSW	02 6620 2100
Southern NSW	1300 066 055
Western NSW	02 6481 2222

10.0 Actions to be taken to control and remedy a pollution incident [Clause 98C(1)(I)]

Actions at the site are guided by a number of internal procedures and safe work statements. Safe work statements identify safety and environmental risks prior to operations being undertaken. Procedures relevant to this pollution response management plan include; spill procedure, incident response procedures, emergency response procedures and reporting procedure.

In the event of a spill procedures as outlined in the emergency response plan are to be followed.

1. In the event of an **Emission to Air** - Site chemists are to be consulted and actions as per recommendation of the chemists are to be undertaken. *If the incident involves threat to life or limb emergency response procedure is implemented.*
2. In the event of **Pollution to Land** - the Site Chemist & Environmental Compliance team is consulted to determine containment and remedial action.
3. In the event of **Fire** - the emergency response plan should be implemented

Not every scenario can be articulated in the emergency or pollution response management plans; however the general nature of incidents can be articulated as outlined above which then provides response guidance to the site.

11.0 Action after the initial response to a Pollution Incident

When a pollution incident has occurred and:

1. Proper notification has been given, and
2. Appropriate action is taken to limit the extent of pollution and make good. The Toxfree quality system requires detailed incident reporting with corrective actions to ensure that we both learn from these incidents and have proper procedures in place.
3. See copies of (1) Incident Report and (2) Observation Report

Note relevant forms are contained in Appendix C.

12.0 Arrangements to minimise risk and harm [Clause 98C(2)(d)]

13.0 Staff Training [Clause 98C(2)(e)]

13.1 Induction Training & Toolbox Meetings

Induction training is carried out for employees (and contractors) and the induction training is a critical measurement of the Occupational Health and Safety Targets.

The induction is described and recorded on the QUEST Training Register. It is carried out by an inductor with supervisory/ management capacity. The induction includes information on alarms, evacuation routes and types of emergencies that may occur at the site.

On Line Inductions are also carried out by all Toxfree personnel including OHS, Corporate, Workplace Bullying, Dangerous Goods Awareness.

Monthly toolbox meetings are held with all operational staff over both sites. These discuss relevant OHSE issues both company and locally plus and observations or incidents during the month. These meetings are minuted and recorded along with Actions on the QUEST Action Register.

13.2 Emergency Preparedness

Emergency evacuation drills are conducted six monthly and the emergency alarms are tested bi-monthly.

13.3 Equipment Training

Training with equipment that may be required in the event of an emergency is to include:

- Use of Portable Fire Extinguishers;
- Use of hose reels;
- Use of PPE; and
- Use of SCBA equipment
- Spill Training.

All personnel will be trained, as appropriate to their roles in an emergency. This training will be undertaken on an annual basis.

13.4 Level of Competence

Competence and awareness training is conducted by Toxfree. Training levels are determined by the position description. Formal training and certifiable training are conducted as required to fulfil a position description.

A training gap analysis has been carried out both locally and from corporate to identify training requirements for each staff member. Each staff member has a tailored folder covering SWMS which apply to their specific role within the business.

13.5 Refresher Training

Toolbox meetings are utilised to refresh various training elements with operational staff. In addition, training such as Spill Response and First Attack Fire Fighting is held to continually improve the competency of staff members

14.0 Maintaining and Testing the Plan

The PIRMP will be initially tested within 3 months of implementation to determine if all aspects have been covered. The initial test will involve a desktop scenario of a pollution incident with Operations Manager, Site Supervisors and random operations staff. The scenario will test site actions and notifications to appropriate authorities. Once the test is completed, the test will be reviewed by delegated staff to assess responses and determine compliance with Pollution Incident Response Management Plan requirements under the POEO Regulations.

Thereafter the plan will be tested in line with the site Emergency Plan at 6 monthly intervals, via the same desktop procedures

The PIRMP will be reviewed at least every 12 months and within 1 month of any pollution incident. After a reportable pollution incident the site will conduct a review. Any deficiencies as a result of the review will be rectified and then retested via a desktop scenario as per testing outlined above.

The PIRMP will be included in QMIR-5 Critical Equipment Register with three (3), six (6) and (12) month reviews instigated. It will also be included in the Site based Management Plan for the two sites.

A copy of this plan will accompany the Emergency Plan.

A copy of this plan will be available in the Emergency Box at the front gate.

15.0 Appendix One – 40 Christie St, St Marys

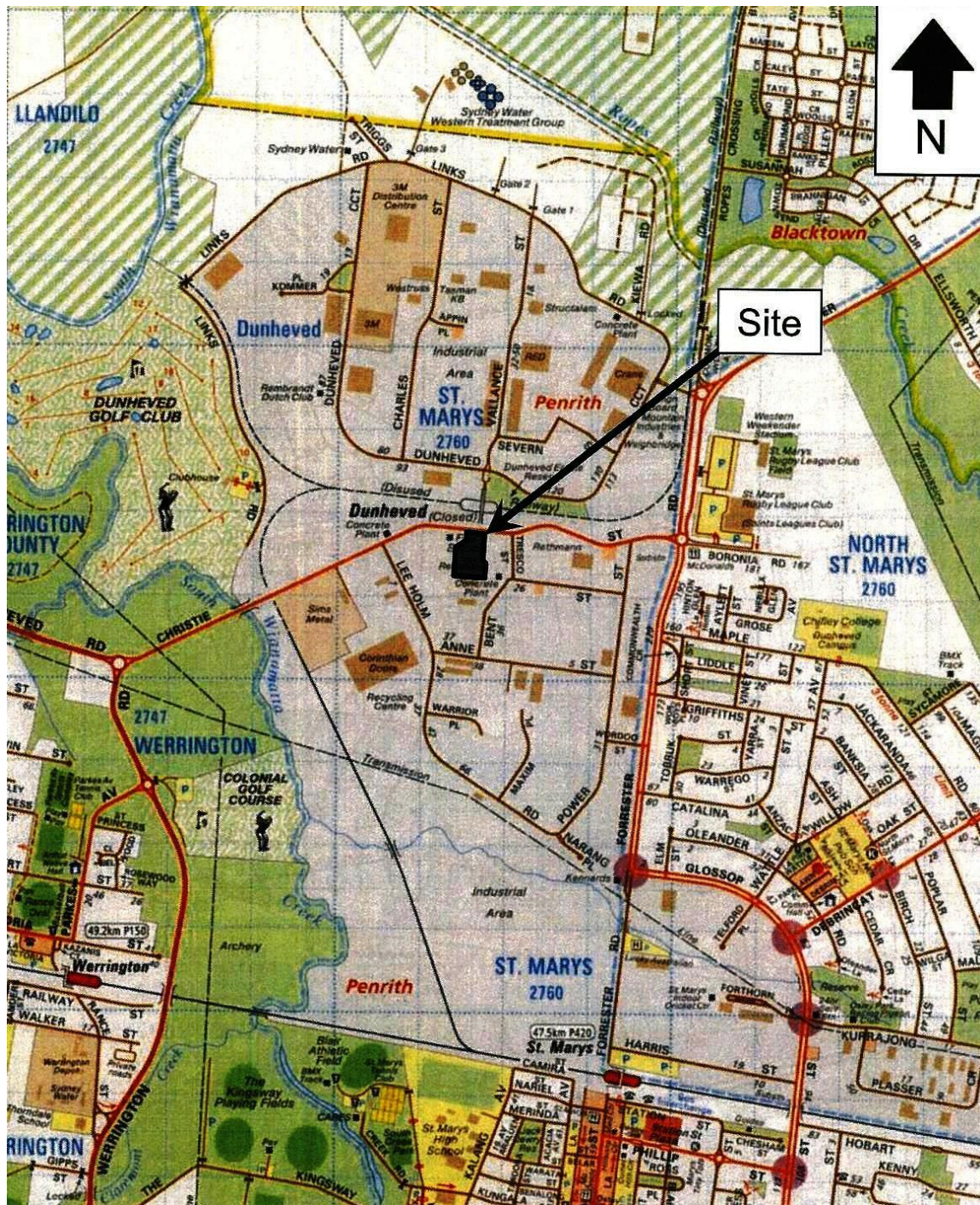
40 Christie Street, St Marys NSW

Site Specific Information

15.1 Neighbouring Facilities

Business	Address	Contact Number
Royal Wolf Containers	36 Christie St, St Marys	02 8071 8300
ADG Welding Supplies	41 – 43 Christie St, St Marys	02 9623 3199
Oceania Timbers	Store 1, 19 – 23 Bent St, St Marys	02 9833 3366
Kookaburra Plumbing	56 – 62 Christie St, St Marys	02 9673 0033

15.3 Site Location Map (Christie St)



15.4 WorkCover NSW Notification of Dangerous Goods

Insert Current *WorkCover NSW Notification of Dangerous Goods* (Christie St) document copy here

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Insert Current *WorkCover NSW Notification of Dangerous Goods* (Christie St) document copy here

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16.0 Appendix Two – 66 Links Rd, St Marys

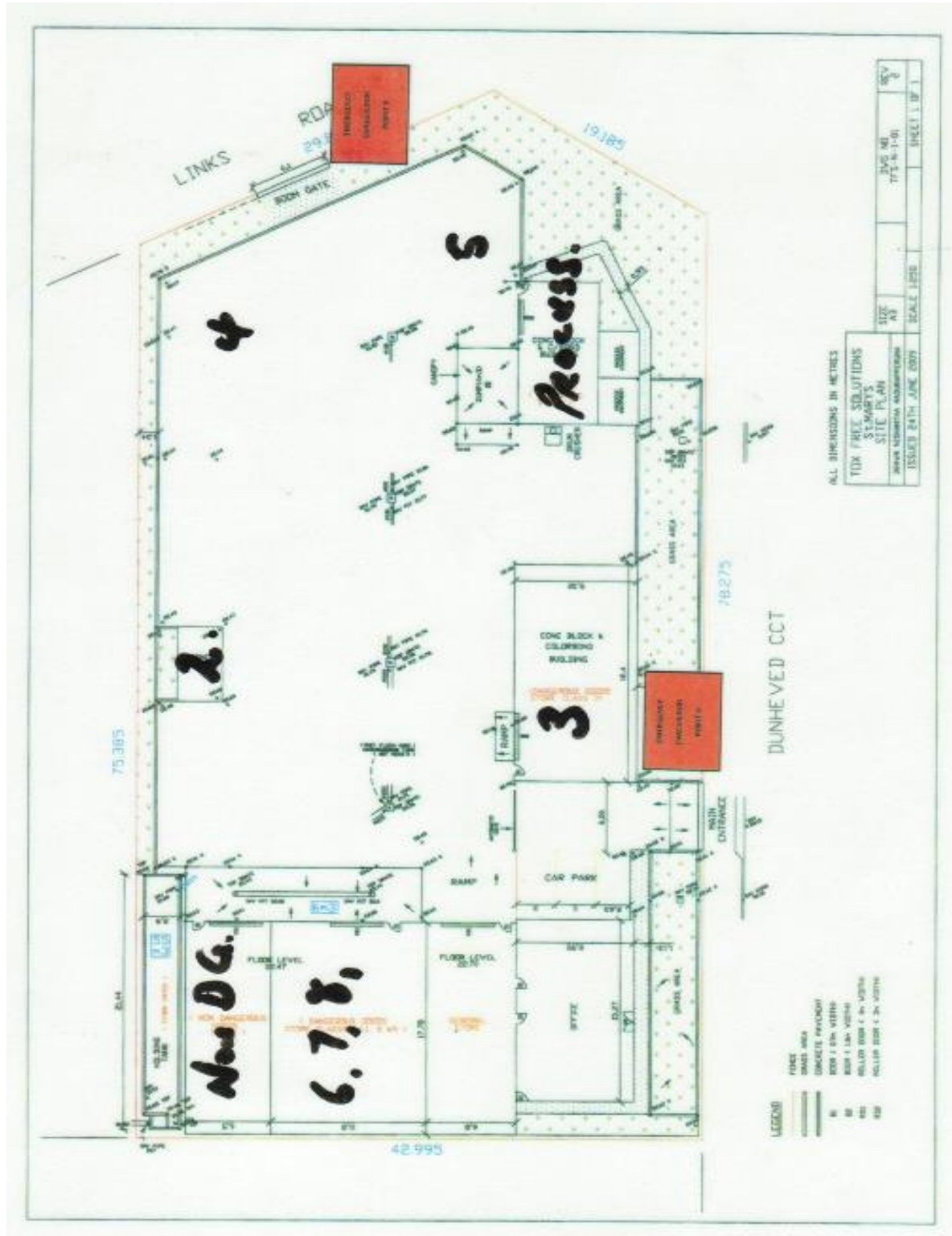
66 Links Rd, St Marys NSW

Site Specific Information

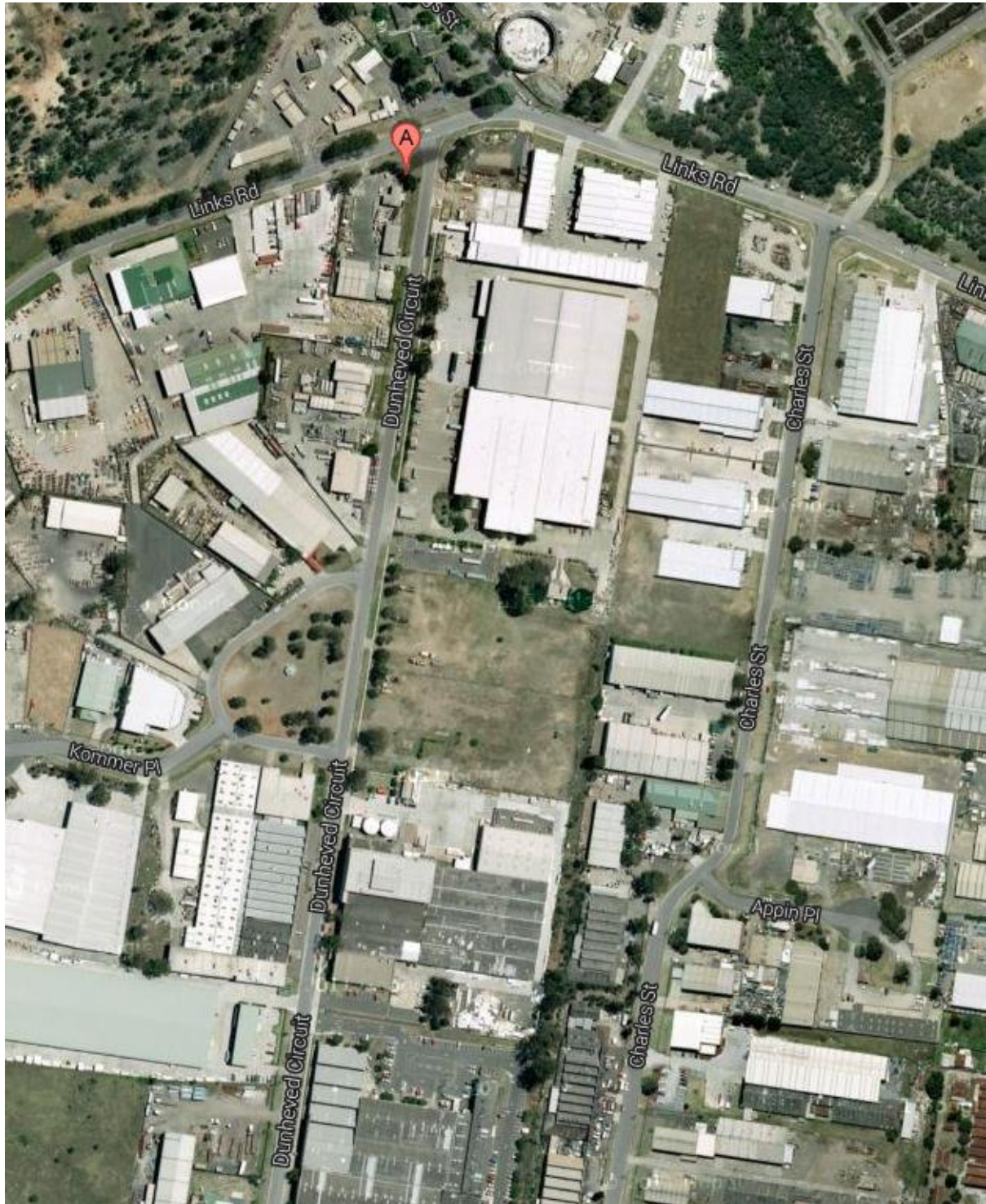
16.1 Neighbouring Facilities

Business	Address	Contact Number
BFE	6 Dunheved Circuit, St Marys	02 9623 6900
Fastening & Hardware Supplies	4 Dunheved Circuit, St Marys	02 9623 5400
Grundys Waste	21 Dunheved Circuit, St Marys	02 9833 9192

16.2 Detailed Site Map (Links Rd) with nominated designated areas for Storage of Hazardous Materials.



16.3 Site Location Map (66 Links Rd, St Marys)



16.4 WorkCover NSW Notification of Dangerous Goods

Insert Current *WorkCover NSW Notification of Dangerous Goods* (Links Rd) document copy here

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Insert Current *WorkCover NSW Notification of Dangerous Goods* (Links Rd) document copy here

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