



BEVERAGE CANS REVESBY

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Environment Protection Authority License 643

1.0 OVERVIEW AND LEGAL REQUIREMENTS

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2009.

Under the legislation referred to above, the Environment Protection Authority License (EPL) also requires a PIRMP (or plan) to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, this plan will be implemented.

The Pollution Incident Response Management Plan contains the following sections as required by the regulation

SECTION		CLAUSE	REQUIREMENTS
1	Background	9.1	Describes main features of the regulation
2	Hazard, likelihood and pre-emptive actions to prevent pollution incident risks	9.2	Describes type of pollution incidents that may be possible and list procedures that are already in place to minimise and manage pollution.
3	Maps	9.3	Map of project to show location of potentially affected neighbours and environmentally sensitive areas
4	Emergency incident response procedures	9.4	What to do in case of material harm
5	Early warnings and communication to neighbours	9.5	When to contact neighbours in case of pollution incidents and info required for website
6	Training	9.6	Information to be passed on to staff and contractors
7	Updating of plan	9.7	Frequency of updates
8	Testing	9.8	Frequency of drills to test effectiveness of PIRMP
9	Implementing of plan	9.9	Reference to legislation requirement to carry out aspects of the plan during a pollution incident

This Pollution Incident Response Management Plan (PIRMP or Plan) Website Information has been written to comply with the legislative requirements under the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2009 s98D. This plan shall be made publicly available in the following manner within 14 days after it is prepared:

- a) In a prominent position on a publicly accessible website of the person who is required to prepare the plan,
- b) If the person does not have such a website--by providing a copy of the plan, without charge, to any person who makes a written request for a copy.

Under Part 5.7 of the POEO Act, there is a duty to notify each relevant authority (identified below) of a pollution incident, where material harm to the environment is caused or threatened. Material harm includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that result in actual or potential loss or property damage of an amount over \$10,000.

For the above pollution incidents, the Orora Beverage Cans will be responsible for reporting to the authorities below without delay.

<i>SCENARIO</i>	<i>AUTHORITIES</i>	<i>CALL SEQUENCE</i>	<i>NUMBER</i>	<i>RESPONSIBLE</i>
If there is an <u>immediate threat</u> to human health or the environment	Call Fire and Rescue	1	000	Supervisor
	Business Systems Manager	2	03 98117165 0417756859	Supervisor
	EPA	3	131 555	Business Systems Manager
	SafeWork NSW	4	131 050	Business Systems Manager
	Bankstown Council	5	9707 9999	Business Systems Manager
If there is <u>not an immediate threat</u> to human health or the environment:	Business Systems Manager	1	03 98117165 0417756859	Supervisor
	EPA	2	131 555	Business Systems Manager
	Bankstown Council	3	9707 9999	Business Systems Manager
	SafeWork NSW	4	131 050	Business Systems Manager
	Fire and Rescue	5	000	Business Systems Manager

Early warnings for affected or potentially affected community members for any pollution incident are to be communicated to those members via a door knock process. The Site Operations Manager or nominee will be responsible for coordinating the door knock.

For air pollution incidents that may affect neighbours, those neighbours will be asked to close their doors and windows and stay indoors until further notice.

For water pollution incidents that may affect neighbours who could access the said water, those neighbours will be asked to avoid use of the water until further notice.

Regular updates of any pollution incidents will be via letterbox drop to the local community, notices in local papers or via door knocks as required.

2.0 INTRODUCTION

Orora Beverage Cans Revesby site is covered by an Environment Protection Licence (EPL) number 643 for the scheduled activities “Hazardous, Industrial or Group A Waste Generation or Storage”. The site has an overarching environmental management system supported by certification to ISO 14001

3.0 PURPOSE

The purpose of this Plan is to improve the way pollution incidents are reported, managed and communicated to the general community to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

4.0 SCOPE

This Plan is for the use of all Orora Beverage Cans Revesby staff involved in the production of aluminium beverage cans. This plan will be implemented only if material harm to human health or the environment occurs or threatens to occur.

The Orora Beverage Cans Revesby site is located at 146 Carrington Street, Revesby, NSW, 2212 [Latitude (-33.939962), Longitude (151.003468)], and holds EPL number 643. Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed.

This Plan is to clearly define the requirements of Orora staff to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the POEO Act 1997 and the POEO (General) Regulation 2010

5.0 RESPONSIBILITIES

- 5.1 All Orora staff and contractors are responsible for understanding and implementing this Plan as appropriately identified. This Plan identifies the general roles and responsibilities of Orora staff. Permanent contractors on site shall also manage pollution incidents in accordance with this Plan.
- 5.2 Supervisors and managers are responsible for ensuring that their staff is aware of this Plan and their roles where appropriate. They are also responsible for the training of their staff
- 5.3 The Business Systems Manager is responsible for:
- Assisting with advice, reporting and response process;
 - Ensuring the Plan is made available to staff responsible for implementing the plan and authorised officers under the POEO Act;
 - Giving advice on whether environmental incidents need to be reported to external agencies;
 - Assisting in the notification of pollution incidents to the relevant authorities
 - Provision of maps associated with the plan;
 - Assistance with the implementation of response actions to pollution incidents

- Assistance in communicating with neighbours and the local community about the Plan and when incidents of a certain nature occur
- Regular Testing; and reviewing this plan

6.0 EVALUATION

- 6.1 The Spills Register, Safety Action and Audit Action register are used to record and monitor all environmental incidents within Orora beverage Cans Revesby. These registers assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The registers are managed on Share-Point and SHE-Assure platforms.
- 6.2 The Business Systems Manager is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

7.0 ADDITIONAL INFORMATION

- 7.1 Contact: Business Systems Manager
 7.2 Phone 03 98117165
 7.3 Mobile 0417756859
 7.4 Effective date: 01 October 2012
 7.5 Review date: As per clause 9.7

8.0 DEFINITIONS

Pollution incidents - Spills	<p>A spill can be the release of any chemical or substance (i.e. – production, waste waters, oil, and fuel) that may potentially enter stormwater, creeks, rivers, ground water or contaminate soil.) The POEO Act definition of a pollution incident is:</p> <p><i>Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise</i></p>
Clean-up Action	<p>All pollution incidents are required to be acted upon immediately. This is a separate action to that of notification. Where possible both should be undertaken concurrently</p> <p>POEO Act definition of "clean-up action", in relation to a pollution incident, includes:</p> <ol style="list-style-type: none"> 1. Action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and 2. Ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and 3. Preparing and carrying out a remedial plan of action. <p><i>It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.</i></p>

9.0 POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

9.1 BACKGROUND

- 9.1.1 This Pollution incident Response management Plan (the Plan) complies with the requirements under the:
[POEO Act 1997 Part 5.7A Duty to Prepare and implement Pollution Incident Response management Plans](#)
[POEO \(General\) Regulation 2009 Part 3A](#)
- 9.1.2 The requirements under the legislation are supported by the [Environmental Guidelines: Preparation of pollution incident response management plans](#), which provides additional advice from the EPA on Plan preparation.
- 9.1.3 Orora Beverage Cans Revesby operates under Environment Protection Authority License No 643 and is therefore required to prepare and implement the PIRMP. Key areas which this Plan covers are described in the following table (Table 1).

PIRMP Legislation covered under this Plan		Reference Clause
POEO Act Part 5.7		
153A	Duty of licence holder to prepare pollution incident response management plan	This document
153C	Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities	9.4
153D	Keeping of plan:	9.5
153E	Testing of plan:	9.8
153F	Implementation of plan:	9.9
POEO (General) Regulation 2009		
98C(a)	Hazard assessment:	9.2
98C(b)	Likelihood assessment:	9.2
98C(c)	Pre-Emptive Action:	9.2
98C(d)	Pollutant Inventory Types:	9.2
98C(e)	Pollutant Inventory Quantities:	9.2
98C(f)	Safety Equipment:	9.2
98C(g)	Staff Contacts:	9.4
98C(h)	Authority Contact:	9.5
98C(i)	Early Warnings Neighbours:	9.2 and 9.5
98C(j)	Staff Safety:	9.2
98C(k)	Maps location of pollutants:	9.2 and 9.3
98C(l)	Early Warnings General:	9.2 and 9.3
98C(m)	Training of Staff:	9.4
98C(n)	Timing of Testing:	9.8
98C(o)	Updating of Plan:	9.7
98C(p)	Plan Testing:	9.8
98D(1)	Availability of plan:	9.5
98D(2)	Publishing Plan Parts:	9.5
98D(3)	Procedures under Act:	9.4
98D(4)	Privacy Protection:	9.5
98E(1)	Testing of the Plan:	9.8
98E(2)	Minimum Testing requirements:	9.8
		<i>Table 1</i>

9.2 HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS

- 9.2.1 This clause deals with the [POEO \(General\) Regulation 2009's sections 98\(a\) to 98\(f\)](#) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.
- 9.2.2 This Plan considers both air and water based pollution incident impacts, based on the site activities - manufacture of aluminium beverage cans. Overall considerable design and written environmental management systems are in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.
- 9.2.3 This Plan uses a modular approach to this risk assessment process. Each module represents an operation undertaken in the manufacture of aluminium beverage cans such as use and storage of hazardous chemicals and use and storage of non-hazardous chemicals.
- 9.2.4 The risk assessment and control measures process includes impact on neighbours and crosses over with safety risk assessment processes and is covered by certification to AS 4801
- 9.2.5 Each module also includes an inventory of pollutants or expected maximum quantities of pollutants likely to be stored. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids.
- 9.2.6 The manufacture of aluminium beverage cans by its nature has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types found for the Orora Beverage Cans Revesby. (Ref Table 2)

DESCRIPTION		COMMENTS
Air Based Emissions	Fire	Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours.
	Noise	Emitted by plant and equipment. Covered under Noise. Not considered a pollution incident, not covered further under this Plan.
	Odour	Odour is generally not associated with this site. Odour incidents are not considered to be material environmental harm, but are included in the PIRMP for consistency with site EMS
Spill type emissions	Lubricants and hydraulic oils	Procedures covering the management of these potential emissions are referenced in Clause 10 of this document
	Paints and surface coatings	
	Pesticides	
	Other chemicals	
	Aqueous wastes	
	Wastes	

Table 2

9.2.7 Storage and handling of substances used at Beverage Cans Revesby Site, which may cause pollution are divided into two areas; Hazardous Chemicals (Covered under Work, Health and safety requirements) and Non-Hazardous substances

9.2.8 For Management of Hazardous and Non-Hazardous substances this PRIMP requires the following items to be addressed

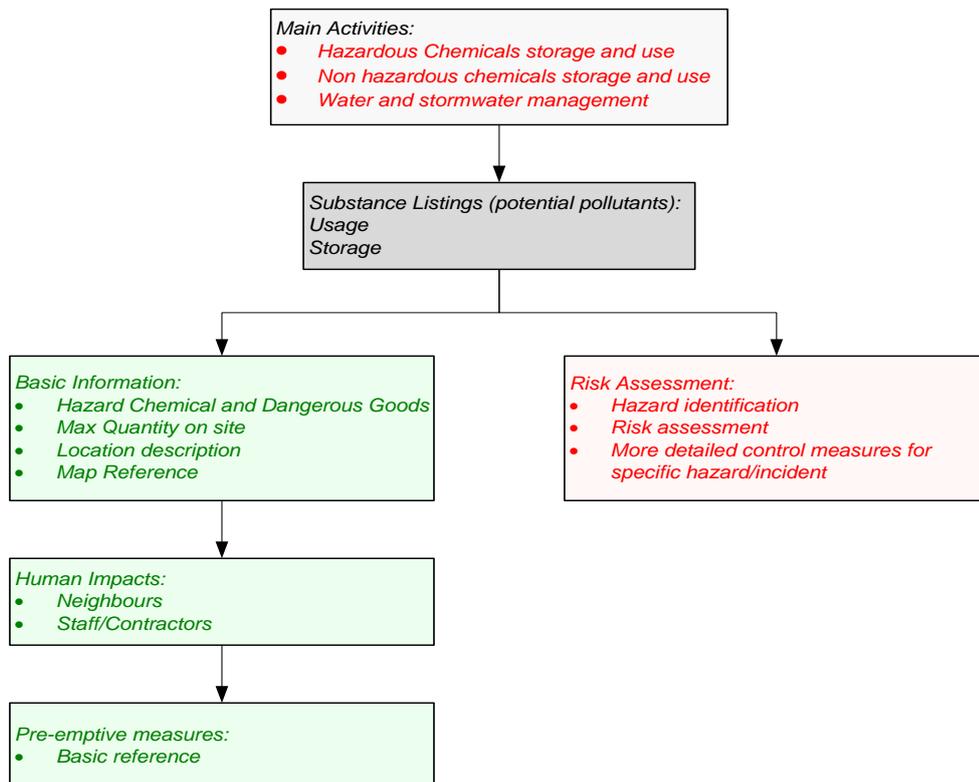
- Key contacts regarding Health and Safety issues and incidents
- Hazardous chemicals register
- Storage and handling requirements
- Plant maintenance records
- Emergency procedures
- Training and record keeping
- Handling of hazardous materials and dangerous goods

Relevant documents addressing these requirements are listed in the [Clause 10 of this document](#)

9.2.9 The Identification of Risk, Risk assessment and Control Measures (pre-emptive actions to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity are covered under the sites Environmental Management System (ISO 14001), and OHS Management Systems (AS 4801)

9.2.10 Site Procedures covering risk identification and assessments are listed in the [Clause 10 of this document](#).

9.2.11 To improve the effectiveness of the Plan the following requirements under the POEO (General) Regulation are covered in this section. This is undertaken by a process described in the following flowchart:



9.3 SITE MAP

9.3.1 This section covers the POEO (General) Regulation s98E(k) requirements which are:

- Figure 1 – Detailed maps showing the location of Beverage Cans Revesby AND Surrounding area that is likely to be affected by a pollution incident

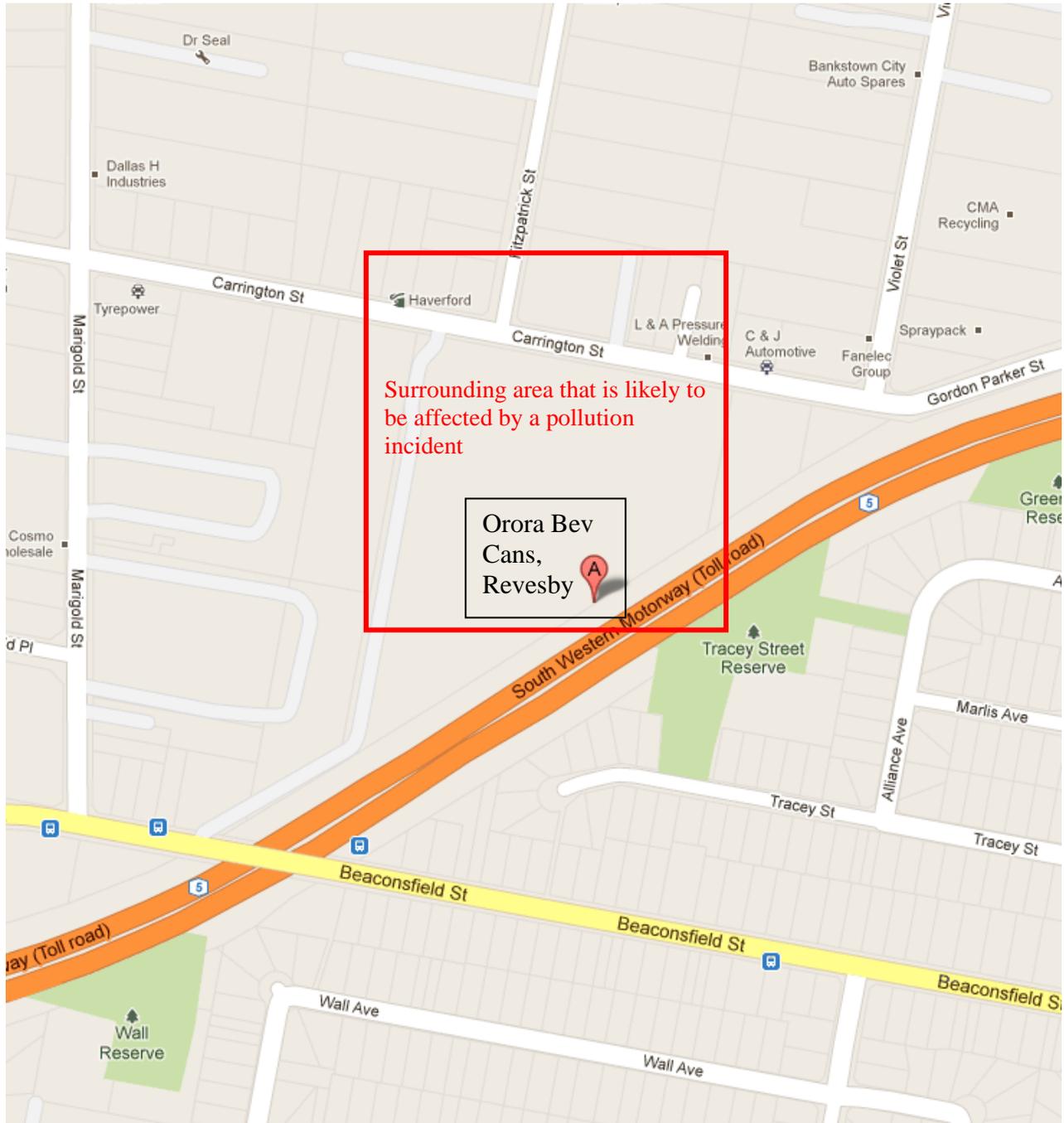


Figure 2 – Location of potential pollutants on the premises (DG Store Map)

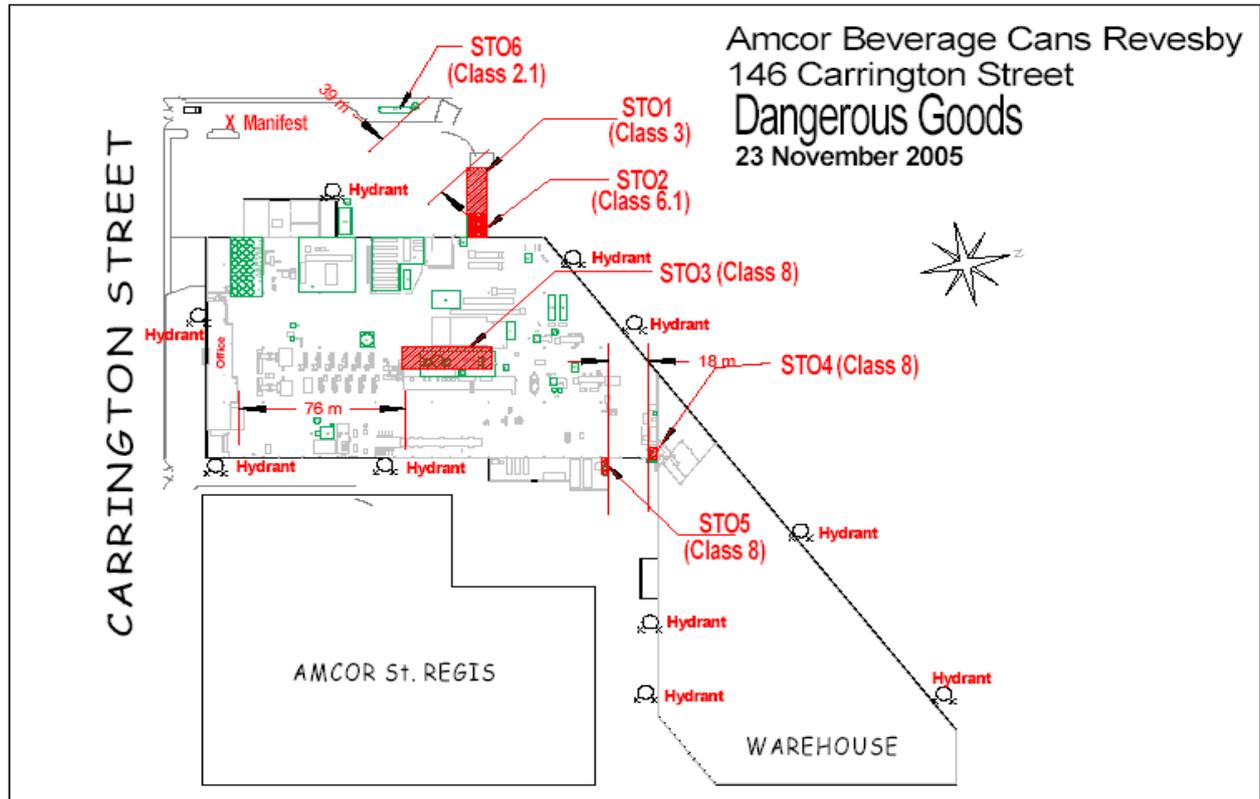


Figure 3 – Location of any Stormwater Isolation Valve.



9.4 EMERGENCY INCIDENT RESPONSE PROCEDURES / LOCATION OF PLAN

9.4.1 This Pollution Incident Response Management Plan will be located with [Guidelines Site Emergencies](#), at Ten (10) different location within the Beverage Can Site and Warehouse managed by Linfox

9.4.2 The list of Documents and / or Registers required for managing various emergency incidents is referenced in [Clause 10 of this document](#)

9.5 EARLY WARNINGS AND COMMUNICATION TO NEIGHBOURS

9.5.1 Where required, Orora Beverage Cans Revesby has and would continue to undertake community and stakeholder consultation, and shall continue to update the community, if required

9.5.2 Table 3 lists Typical Main Pollutants and Potential Neighbour Impacts and Early Warnings

Air Based Emissions		
Description	Potential Risks	Early Warning actions
Dust	Air quality issues Loss of amenity Community complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
Fire - smoke	Air quality issues	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice. For larger fires, coordinate with combat agencies.
Noise	Loss of amenity	Not required under PIRMP. Communicate with neighbours on as needs basis.
Odour	Air quality issues Loss of amenity Community Complaints	In extreme cases contact neighbours via doorknock process and ask them to close windows and doors and stay inside until further notice
Spill type emissions		
Fuel including diesel and petrol based fuels	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice. For larger spills coordinate with combat agency.
Lubricants and hydraulic oils	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Pesticides/herbicides	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice. For larger spills coordinate with combat agency.
Other chemicals	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice

Soils and erosion	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Contaminated materials uncovered	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice
Wastes	Water quality issues if spill enters waterway Community complaints	In extreme cases contact neighbours via doorknock process and ask them to avoid use of the water until further notice

Table 3

9.6 TRAINING

9.6.1 Necessary environmental management competencies have been determined for all positions at Orora Beverage Cans Revesby

9.6.2 To also satisfy the requirements under this PIRMP the training shall include:

- Awareness of the PIRMP
- Where this Plan can be accessed
- Pollution incident classification and reporting under this plan
- Spill response actions under this plan
- Other incident response actions under this plan
- Early warnings internally and to neighbours where appropriate
- Specific procedures in dealing with potential pollution incidents e.g. pump out of sedimentation basins

9.6.3 Training of PIRMP may be combined with the Annual OHSE+FS Induction.

9.7 REVIEW AND UPDATE OF PLAN

9.7.1 The plan will be updated upon the following conditions

- At least 24 months from the last review as per the requirements defined in Document Control Procedure, OR
- Within 1 month of a major incident, OR
- Within 1 month of a major change to plant operations, OR
- Within 1 month of change / update in relevant legislation, or
- Within 1 month of any changes identified during the testing of this plan

9.7.2 Individual procedures listed at the end of this document will be subject to their own review processes

9.8 TESTING

9.8.1 The POEO (General) Regulation 2009 98E states for testing of the Plan:

1) The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.

2) Any such test is to be carried out:

(a) Routinely at least once every 12 months, and

(b) Within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner

- 9.8.2 Testing of the Plan will be integrated into other emergency and incident testing and training programs.
- 9.8.3 Most of the testing shall be completed by Scenario Testing. Where required an evacuation drill shall be performed
- 9.8.4 A detailed record of the testing of the Plan will be prepared after each testing of the plan is undertaken. If the test identifies any shortcomings in the Plan, especially the implementation of the spill response procedures, the Plan will be corrected or appropriate non-conformance actions will be undertaken.
- 9.8.5 Records of the testing will be kept by the site Business Systems Manager

9.9 **IMPLEMENTATION OF THE PLAN**

- 9.9.1 The POEO Act 1997 s153F requires the Plan be implemented if a pollution incident occurs. \$2 million maximum fines apply for failing to implement the Plan.
- 9.9.2 In case of a pollution incident, it must be responded to according to this Plan and its reference documents.
- 9.9.3 An incident response report/audit shall be completed

10.0 PROCEDURES IN PLACE

- 10.1 The following procedures are in place to control risks and report and control incidents. Copies may be obtained from the Business Systems Manager phone number [0417756859](tel:0417756859) or e-mail zane.matana@ororagroup.com on request.

<i>EMERGENCY / SCENARIO</i>	<i>REFERENCED DOCUMENT(S)</i>
Risk assessment	Procedure Risk Management
Emergency Procedure	Site Emergency Guidelines, Procedure Evacuation
Fire Control	Site Emergency Guidelines
Noise	Procedure Noise Control
Spill	Procedure Spill Response
Delivery of packages chemicals	Procedure Delivery Non Bulk Chemicals
Delivery of bulk chemicals	Procedure Delivery Bulk Chemicals
Sydney Water Sewer Procedure	Procedure Waste Water Discharge Testing
Dangerous Goods manifest	Dangerous Goods and Combustible Liquids Manifest
Dangerous Goods storage	Procedure DG_HS Storage
Training	Procedure Training, Procedure Induction
Cooling Towers	Procedure Cooling Towers Management
Waste disposal and tracking	Procedure Waste Handling and Tracking
Herbicides	Guidelines Pest and Weed Control
Pesticides	Guidelines Pest and Weed Control
Site Inspections	Procedure Housekeeping, Procedure Workplace Inspection
Communications	Guidelines Internal and External Communications
Bund emptying	Procedure Bund Management
Site Layout drawing	Site Layout available in System
Testing of plan	Site Emergency Guidelines

Table 4

11.0 COMMUNICATIONN WITH EPA NSW

- 11.1 Orora Beverage Cans Revesby provides 12 monthly reports of VOC emissions. Information on VOC discharges is publically available on the NPI web site.
- 11.2 Orora Beverage Cans Revesby provides Annual reports of NPI. NPI Reports are publically available on the NPI web site
- 11.3 Orora Beverage Cans Revesby completes the annual return as per the requirements of EPA NSW.

12.0 MONITORING AND RECORDING – LEGAL REQUIREMENTS

- 12.1 Under the condition of Site’s EPA Licence, The Environment Protection Authority requires:

Licensees who undertake monitoring as a result of a licence condition to publish or make available pollution monitoring data within 14 days of obtaining the data and/or receiving a request, in accordance with requirements issued in writing by the Environment Protection Authority (EPA) – section 66(6)

- 12.2 The key words are “undertake monitoring as a result of a licence condition”. The site’s Environment Protection Authority Licence states under section 5:

- ***M1 Monitoring records***

- *M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.*
- *M1.2 All records required to be kept by this licence must be:*
 - *(a) in a legible form, or in a form that can readily be reduced to a legible form;*
 - *(b) kept for at least 4 years after the monitoring or event to which they relate took place; and*
 - *(c) Produced in a legible form to any authorised officer of the EPA who asks to see them.*
- *M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:*
 - *(a) the date(s) on which the sample was taken;*
 - *(b) the time(s) at which the sample was collected;*
 - *(c) the point at which the sample was taken; and*
 - *(d) the name of the person who collected the sample.*

- ***M2 Requirement to monitor concentration of pollutants discharged***

- *M2.1 Not applicable.*

- 12.3 Based on the above requirements under the Site’s EPA Licence, the site is not required to monitor any pollutants discharged, and therefore is not required to “undertake monitoring as a result of a licence condition”.

- 12.4 As per Clause 11.1 Information on VOC discharges is publically available on the NPI web site