

	Pollution Incident Response Management Plan (PIRMP)	Issue: 1
Approved By: Business Systems Manager		Date of issue: 1 st October 2012

Orora Cartons Botany

Pollution Incident Response Management Plan (PIRMP)

Licence Number 1036

1. Overview

This Pollution Incident Response Management Plan (PIRMP) 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 EPL requires a PIRMP 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, the PIRMP will be implemented.

2. Introduction

This external web-based version of the Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with the Environment Protection Authority's (EPA) requirements. The requirements include that the following sections of the plan be made publicly available:

- Procedures for contacting the 'relevant authorities.
- Procedures for communicating with the community (excluding any personal information).

The Orora Cartons Botany Emergency Manual complies with all the requirements of a PIRMP.

The Emergency Manual is applicable to all Orora Cartons Botany staff, visitors and contractors and sets out their responsibilities including notifying, responding and managing pollution incidents.

A copy of the full Emergency Manual is maintained at the premises to which the relevant licence relates. It is readily available to the person responsible for implementing the Emergency Manual, the emergency services and to an authorised EPA officer on request.

The plan is tested annually and is updated whenever new information becomes available.

3. Pollution Incident definition

A 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.

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:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- 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.

4. Immediate notifications of incident to relevant authorities

Orora Cartons Botany is required to immediately notify the following regulatory authorities where a pollution incident has or is likely to occur:

- Local Council.
- NSW EPA.
- NSW Health (local Public Health Unit).
- WorkCover NSW.
- Fire and Rescue NSW.
- Sydney Water.

The Chief Warden, General Manager or delegate is required to report all pollution incidents to the relevant authorities listed in the below table immediately after the incident is identified.

Table 1 - Relevant authorities to be notified

SERVICE	DESCRIPTION	NUMBER
Emergency Services	Fire & Rescue, Ambulance or Police	000
EPA – Environment Line	Air, water, land, noise pollution	131 555
Local Health Authority	South Eastern Sydney	9450 7756
	St George Hospital	9113 1111
Ministry of Health		9391 9000
City of Botany Bay Council	Local Authority	9366 3666
Workcover NSW	Compliance and Safety	13 10 50
Sydney Water	Local Authority	13 20 90

The information required to be provided as part of the notification process includes:

- 1) The time, date, nature, duration and location of the incident.
- 2) The location of the place where pollution is occurring or is likely to occur.
- 3) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known.

- 4) The circumstances in which the incident occurred (including the cause of the incident, if known).
- 5) The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- 6) Other information prescribed by the regulations.

Lack of any of the above information should not prevent the Chief Warden or General Manager from making an immediate notification. As additional information becomes available, it would be communicated to all the relevant agencies immediately.

5. Potential scenarios for a pollution incident

The potential scenarios which may lead to a pollution incident at Orora Cartons Botany include:

- Fire and Explosion.
- Hazardous Chemicals Spill / Environmental Release.
- Gas Leak / Gas Release / Explosion.
- Earthquake / Building Collapse.
- Civil Unrest / Demonstrations / Intruders.

The site Emergency Manual covers the potential hazards and resultant residual risk associated with the operations of Orora Cartons Botany. Appropriate controls to manage and mitigate the identified hazards will be implemented.

6. Community notification

A decision to notify neighbours and the local community will be made in consultation with regulatory authorities based on an initial risk assessment (for example, considering the type of pollutant, concentration of emission, prevailing wind and height of the emission).

The Orora Cartons Botany site operates an after hours emergency number which can be used by any party to report environmental disturbances or other complaints relating to onsite operations.

The phone number is (02) 9394 0555 and is available 24 hours per day 7 days per week.

Calls are monitored by communications services and if urgent action is required are referred immediately to the site Operations Manager for

attention. If immediate action is not requested they are followed up on the next business day. The public are made aware of this service by the signs that are placed prominently at the site boundary.

Any press releases issued to the media will be done so through the General Manager and are to contain the following information. Releases must be approved by the General Manager.

- Description of the nature of the emergency.
- The corrective action taken and its effectiveness.
- When the emergency is expected to be over.
- The investigative action that will or has been taken.
- Any assistance that can be given by the media.