



AUTOPAK-VETLAB GROUP PTY LTD



ABN 23 002 848 633

*INDEPENDENT CONTRACT MANUFACTURERS OF
AGROCHEMICALS AND ANIMAL HEALTH PRODUCTS*

39 Harris Street, St. Marys, N.S.W 2760 Telephone: (61 2) 9678 0233 Facsimile: (61 2) 9673 1289



Pollution Incident Management Plan

Prepared by: Colin Maxwell, QA & WHS Manager

Version 1

Annual Review due: 31st August 2014

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	OPERATING	Issue Date 31/08/12
	PROCEDURE	No of attachments:
TITLE: POLLUTION INCIDENT MANAGEMENT PLAN		

1. PURPOSE

To document a method whereby notifiable pollution incidents are documented and communicated to the relevant authorities and the community in accordance with Protection of the Environment Legislation Amendment Act 2011 (POELA Act)

2. SCOPE

This plan is applicable to EPA licenses

Licence No:	4425
Licensee:	Vetlab Pty Limited
Facility Name:	Vetlab Pty Limited
Location:	25 Harris Street, St Marys

Licence No:	1035
Licensee:	Autopak Formulators Pty Limited
Facility Name:	Autopak Formulators Pty Limited
Location:	39 Harris Street, St Marys NSW

3. DEFINITIONS

3.1 Notifiable Pollution Incident

This is a pollution incident that escapes the site's boundaries into the air, water or soil e.g., into the storm-water system or gutters outside the site boundary.

OR

The contamination is confined to the site boundary **AND** costs \$10,000 or more to clean up.

4. METHOD

4.1 Notification. Actions to be taken during or immediately after a pollution incident [clause 98C(1)(I)]

Written By: C.Maxwell
(QA Manager)

Approved by : P.Kearney
(General Manager)

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(a) Notify the relevant authorities, tenants and neighbors

In the event of a notifiable pollution incident being declared by the managing director, or his delegate, the receptionist, will alert the relevant authorities and neighbors in accordance with **Work Instruction 601**.

(b) In conjunction with local authorities, decide action to be taken.

(c) Update relevant authorities, tenants and neighbors as new information becomes available [clause 98C(1)(i)]

When instructed by the managing director or his delegate, the receptionist will contact neighbors and advise details of early warnings and updates. Records of the date and time called will be kept in accordance with **Work Instruction 601**

The community can obtain updates by telephoning the Public Community Lines on

- + 61 2 9673 2566
- 0418 416 097
- 0409312 879

(d) Follow- up with a report of the incident in writing to the EPA within one week of the incident.

Describe additional notification and any additional notification

(e) Test the plan in accordance with WI 604 Testing the PI Management Plan

(f) Availability of the Plan

The plan is to be made readily available to an authorised officer on request, and at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.

Only a portion of the plan is to be made **publicly available** within 14 days after it is prepared

In accordance with SOP 603, upon written request from the community she will send free of charge copies of

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- **WI 601 Notification of a Pollution Incident to the Relevant Authorities**
- **WI 602 Communicating with the Community**
- **Form: EPA Notification**

She will also record the applicant's details in accordance with **Work Instruction 602**

4.2 Additional Notification to Relevant Authorities

Re-notify the above by telephone immediately additional information becomes available. This can be up to within 7days after the incident and before a written report is sent to the above. Inform the EPA in writing within 7 days with a detailed description of the incident and the subsequent action taken

4.3 Immediate Action to be taken after the pollution incident

For spills, cover the nearest storm water grate with a large plastic bag filled with water. Also ensure that the exit from the detention pit is closed. Cover the spill with sand, and then collect in drums for subsequent disposal. If the spill has entered the detention pit, it should be pumped into 1000L bulki-boxes for subsequent processing in the liquid waste treatment plant.

4.4 Keeping of Plan

A copy of the Plan and the site map is to be kept in the red information box near the front gate.

4.4.1 Testing , Maintaining and Updating the Plan

The dates on which the plan has been tested and the name of the person who carried out the test will be recorded in addition to the dates on which the plan is updated

Following a pollution incident and at least once a year the plan is to be tested and maintained is described in **WI 604 Testing the PI Management Plan**

4.5 Staff Training [clause 98C(1)(m)]

The nature and objectives of the training program in relation to the plan are described in **Structured Training Plan STP 15 Control of Accidental Spillage**

4.6 Map of the premises and a map of the surrounding area[clause 98C(1)(k)]

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A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any storm water drains on the premises is shown in **Attachments 5 and 6**.

5. HAZARDS

5.1 Description and likelihood of hazards to human health and the environment [clause 98C (1)(a) and (b)]

The hazards to human health or the environment associated with the company's activity to which the licence relates fall into Dangerous Goods Classes 3, 5, 8, and 9 and are described below

5.1.1 Class 3 Flammable

- **May irritate or burn skin and eyes.**
- Runoff from fire control or dilution water may pollute waterways.
- Vapour may cause dizziness or drowsiness.

5.1.2 Class 6 Toxic

- Poisonous, may be fatal if inhaled, swallowed or absorbed through skin.
- Inhalation, ingestion or contact with the substance may cause severe injury or death.
- Effect of contact or inhalation may be delayed.
- Runoff from fire control or dilution water may be poisonous and/or corrosive and pollute waterways.

5.1.3 Class 8 Corrosive

- Poisonous, may be fatal if inhaled, swallowed or absorbed through skin.
- Inhalation, ingestion or contact with the substance may cause severe injury or death.
- Contact with molten substance may cause severe burns.

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- Runoff from fire control or dilution water may be poisonous and/or corrosive and pollute waterways.

5.1.4 Class 9 Environmentally Hazardous Substances

- Inhalation or contact with substance may be harmful.
- Runoff from fire control or dilution water may pollute waterways.

5.2 Likelihood of such hazards occurring

Unlikely to occur during normal handling. Conditions or events that could, or would, increase that likelihood, include spills, leaks, or fire. Refer **Attachment 7 Risk Assessment of the site's hazards**.

5.3 Action that will be taken to control these hazards

Pre-emptive action [**clause 98C(1)(c)**] to be taken to minimise or prevent any risk of harm to human health or the environment include:-

- Early warnings
- Updates
- Actions to be taken during and after a pollution incident
- Bunding production areas, tanks, and warehouses.
- Plastic bags filled with water to prevent entry of spilt liquids into storm water drains.
- 50, 000 litre sump to catch runoff.
- Spill control procedure, **WI 217 Control of accidental spillage**
- Risk assessments of the sites hazards. These include the measures to control these risks and are shown in Attachment 7 Risk Assessment of the site's hazards.

5.4 Minimising harm to persons on the premises [**clause 98C(1)(j)**]

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Any identified risk of harm to human health will be reduced, by control measures outlined in individual batch and pack sheets and **Attachment 7 Risk Assessment of the site's hazards**. In the event of a spill that is not reportable, **WI 217 Control of accidental spillage** will be followed .

Where applicable, staff are provided with training, PPE and access to MSDSs.

Pre-emptive actions to be taken include:-

5.4.1 Actions described in section 5.3 above. .

5.4.2 Safety equipment and infrastructure to minimize the risk to human health and the environment [clause 98C(1)(f)]

Safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident include:-

-PPE including SCUBA, full face shield, dust mask, safety glasses, gloves safety shoes and overalls.

-Equipment for confined space entry.

5.5 Inventory and maximum quantity and location of each potential pollutant [clause 98C(1)(d) and (e)]

Attachments 1-4 contain the **Site Inventory and Maximum Quantity of Potential Pollutants** on the premises or used in carrying out the relevant activity, as well as the maximum quantity of any pollutant that is likely to be stored or held at particular locations at or on the premises to which the licence relates.

A copy is kept in the red fire box near the main gate

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6. KEY PERSONNEL

Authority	Name	Position	Tel (Business hours)	Tel After hours)
Responsible for activating the plan	Dr Paul Kearney	General Manager	(02) 02 9678 0222	0418 641 964
Authorised to notify relevant authorities under section 148 of the Act	Peter Kearney	Managing Director	(02) 02 9678 0212	0450 663 800
Responsible for managing the response to the pollution incident.	Colin Maxwell	QA & OHS Manager	(02) 02 9678 0233	0401 624 023

5. REFERENCED DOCUMENTS

STP 15 Control of Accidental Spillage

SOP 201 Generation, treatment and disposal of aqueous waste

SOP 604 Emergency action procedure.

SOP 701 Risk Management

WI 108 Control and testing of storm water in the detention pit

WI 217 Control of accidental spillage

WI 509 General emergency action – general

WI 510 General emergency action - receptionist

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WI 511 General emergency action – response team

WI 512 General emergency action – fire wardens

WI 513 General emergency action - first aid team

WI 601 Notification of a Pollution Incident to the Relevant Authorities

WI 602 Communicating Information about Pollution Incidents to the Community

WI 603 Community Requests for the PI Management Plan

WI 604 Testing the PI Management Plan

Form: EPA Notification

6. ATTACHMENTS

Attachment 1 Site Inventory for Autopak Formulators

Attachment 2 Site Inventory for Vetlab

Attachment 3 DG Licence for Autopak Formulators Showing Maximum Quantity of Potential Pollutants

Attachment 4 DG Licence for Vetlab Showing Maximum Quantity of Potential Pollutants

Attachment 5 Map of the premises and a map of the surrounding area

Attachment 6 Site Map Showing Warehouse Locations and Adjacent Properties

Attachment 7 Risk Assessment of the Site's Hazards (SOP 701)

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AMENDMENT RECORD		
ISSUE NO	DATE	DESCRIPTION OF CHANGE
1	31/08/12	New

END OF PROCEDURE

DISTRIBUTION:

QA Manager's Office
Production Manager's Office
QA Supervisors' Office
QC Manager
Red Fire Box

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Attachment 1 Site Inventory for Autopak Formulators

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Attachment 2 Site Inventory for Vetlab

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Attachment 3 DG Licence for Autopak Formulators Showing Maximum Quantity of Potential Pollutants

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Attachment 4 DG Licence for Vetlab Showing Maximum Quantity of Potential Pollutants

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Attachment 5 Map of the premises and a map of the surrounding area



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Attachment 6 Site Map Showing Warehouse Locations and Adjacent Properties

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Attachment 7 Risk Assessment of the Site's Hazards (SOP 701)

ENVIRONMENTAL ASPECT	HAZARD	RECEIVING ENVIRONMENT	POTENTIAL RECEPTORS	POTENTIAL ENVIRONMENTAL IMPACT	LIKLIHOOD	CONSEQUENCE	O/ALL RATING	CONTROL MEASURE
Use & storage of chemicals	Uncontrolled spill leading to discharge to storm - water system	Surface waters	<ul style="list-style-type: none"> • Aquatic ecosystem & users 	<ul style="list-style-type: none"> • Water pollution • Potential health impacts for those that come into contact with it 	E	3	M	Bunding of warehouses & tanks. Use of SCUBA equipment.
					E	2	L	
Use & storage of chemicals	Uncontrolled spill leading to discharge to land	Land Groundwater	<ul style="list-style-type: none"> • Employees • Neighboring residents 	<ul style="list-style-type: none"> • Land contamination and/or groundwater pollution • Potemntial health impacts for those that come into contact with it 	E	3	M	Bunding of warehouses & tanks. Use of SCUBA equipment.
					E	2	L	

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Vapours emitted during operations	Emissions contain potentially harmful substance	Local Air-shed	<ul style="list-style-type: none"> • Employees • Neighboring residents 	<ul style="list-style-type: none"> • Inhallation of vapours leading to illness 	D	2	L	Pass vapours through scrubbers.
Off-site disposal of waste to landfill	Waste contaminated due to poor segregation	(Off-site) Land Groundwater	<ul style="list-style-type: none"> • Employees of Landfill • Neighboring residents of Landfil 	<ul style="list-style-type: none"> • Land contamination and/or groundwater pollution • Potemntial health impacts for those that come into contact with it 	E	3	M	Triple rinse containers before crushing.
					E	2	L	Segregate metal and paper waste