

Pollution Incident Response Management Plan

CCA Hardchrome Pty Ltd

EPA Licence No. 6656

36 Tattersall Road, Kings Park NSW

May 2019

Senior Management Endorsement

The following PIRMP is endorsed by the organisation's Senior Management per the below authorisation.

Name: _____

Signature: _____

Position: _____

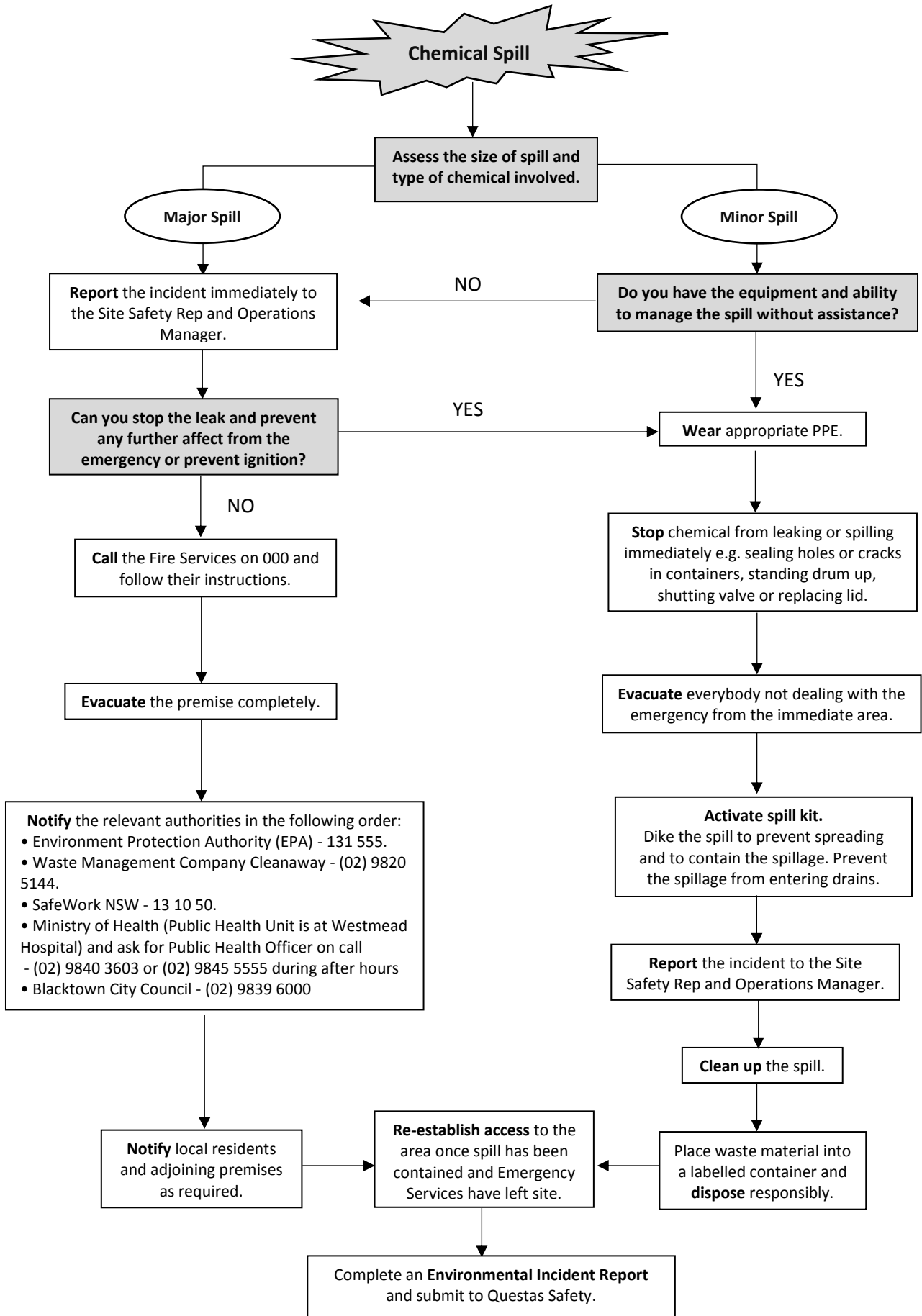
Approved Date: _____

Pollution Incident Response Management Plan (PIRMP)

Table of Contents

1.0 Purpose	1
2.0 Roles and Responsibilities.....	1
3.0 Immediate Notification of Pollution Incident	2
4.0 Site Description (including maps)	2
5.0 Description and Likelihood of Hazards, Method of Prevention of Harm to the Environment and Action to be taken.....	4
6.0 Inventory of Pollutants	6
7.0 Safety Equipment.....	7
8.0 Emergency Response and Notification of Pollution Incidents	7
9.0 Emergency Telephone Numbers.....	8
10.0 Procedure for Notifying Local Residents and Adjoining Premises	8
11.0 Actions to be taken During or After a Pollution Incident	9
12.0 Chemical Spill Management Procedure.....	9
13.0 Training	10
14.0 Testing, Review and Maintenance.....	10
15.0 Availability of the PIRMP.....	10
Appendix 1 – PIRMP Testing Record	
Appendix 2 – Environmental Incident Response Checklist	

CHEMICAL SPILL FLOW CHART PROCEDURE



1.0 Purpose

CCA Hardchrome Pty Ltd is covered by an Environment Protection Licence 6656 for metallurgical activities.

As per the Protection of the Environment Operations Act 1997 (POEO Act), the holder of an environment protection licence is required to prepare and implement a '**Pollution Incident Response Management Plan**' (**PIRMP**).

The purpose of this PIRMP is 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, WorkCover 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.

The PIRMP will only be implemented if Material Harm to human or to the environment occurs or threatens to occur.

Material Harm is defined by 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.

It is important that all CCA Hardchrome staff are familiar with this plan. All procedures in this document should be used as a guide. Initiative and flexibility may be required to obtain a successful response in an emergency.

2.0 Roles and Responsibilities

All CCA Hardchrome staff are responsible for:

- understanding and implementing this PIRMP;
- reporting any spills, odours, leaking of chemicals and unusual noise immediately to the operations manager;
- cleaning up any spills immediately, if safe to do so.

CCA Hardchrome Operations Manager is responsible for

- ensuring that all staff are aware of this PIRMP and their roles where appropriate;
- the training of staff;
- recording mock drills and making necessary amendments to the PIRMP in consultation with Questas Safety.

Pollution Incident Response Management Plan (PIRMP)

- the annual testing of the PRIMP;
- the notification of pollution incidents to the relevant authorities.

Questas Safety is responsible for:

- assisting with advice, reporting and response process;
- ensuring this PIRMP 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;
- assisting with the implementation of response actions to pollution incidents;
- reviewing the PRIMP.

3.0 Immediate Notification of Pollution Incident

A licensee is required to report pollution incidents immediately to all the Appropriate Regulatory Authorities (ARA). These include:

- Environment Protection Authority (EPA)
- Ministry of Health
- SafeWork NSW (formerly WorkCover)
- Blacktown City Council
- Fire and Rescue NSW.

'Immediately' has its ordinary dictionary meaning of promptly and without delay. This is to ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

4.0 Site Description

CCA Harchrome is located at 36 Tattersall Rd, Kings Park NSW 2148.

The company specialises in a range of services including hard chrome plating, sulfamate nickel plating cylindrical grinding, finishing and general machining. The hard chrome plating process uses a number of chemicals varying from dangerous goods that are hazardous to inert chemical with little effect on the environment.

Business is normally conducted from 6 am – 7 pm, six days a week.

On a standard business day there are approximately 10 people on site.

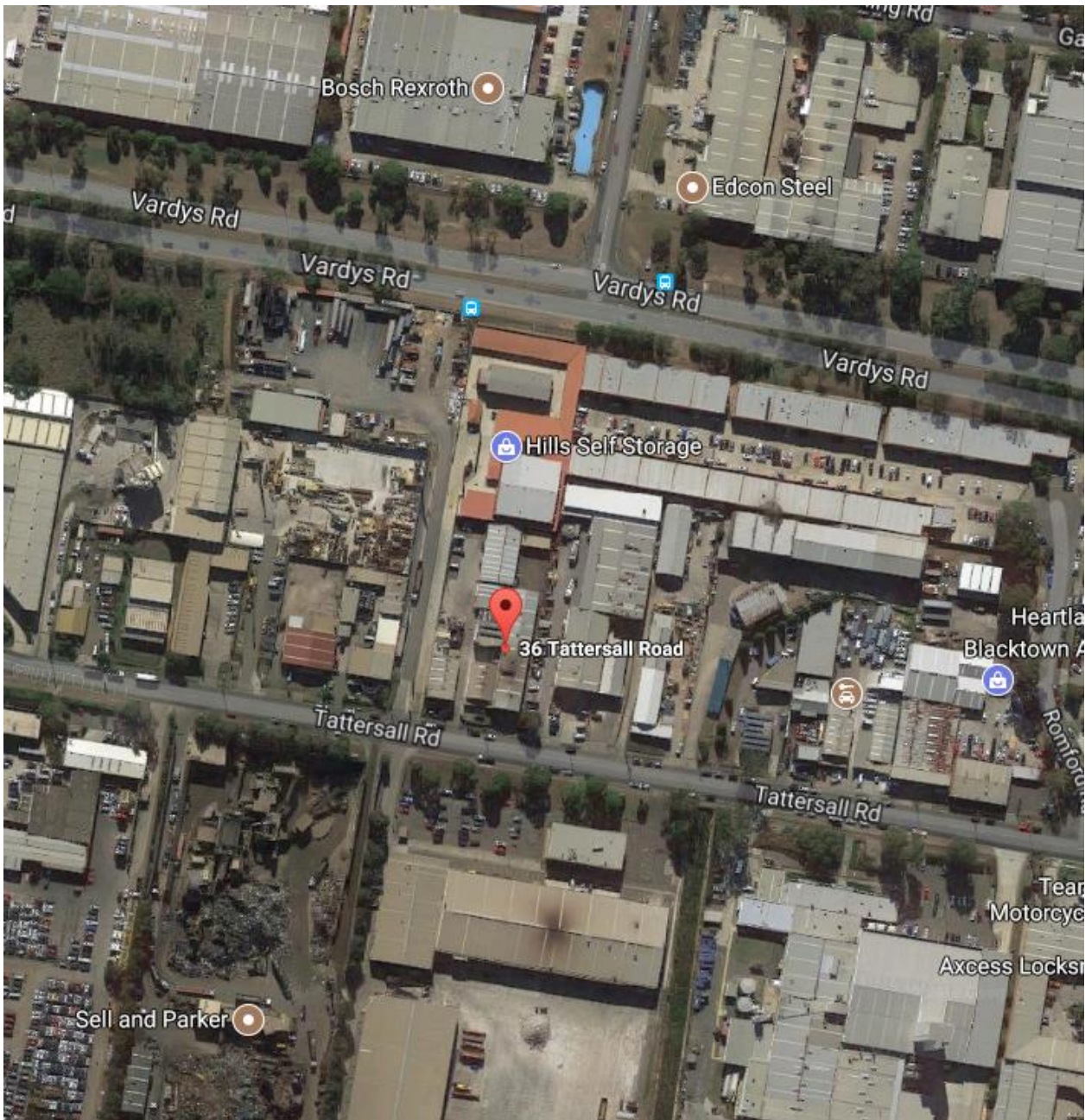


Figure 1 - Location of CCA Hardchrome Pty Ltd at 36 Tattersall Rd, Kings Park NSW 2148

5.0 Likelihood of Hazards, Method of Prevention of Harm to the Environment and Action to be taken

ITEM	LOCATION	HAZARDS	METHOD OF PREVENTION OF HARM TO THE ENVIRONMENT	ACTION TO BE TAKEN
Plating Tanks	Workshop	Leaking tank, overflow of tank, or damaged tank liner and tank wall	<ul style="list-style-type: none"> • Spill kit is available. Spill kit training is conducted on regular basis. • All staff to report to manager any spills, odours, leaking chemicals and unusual noise immediately. • Staff to never under any circumstance leave hoses unattended in chrome tanks when increasing solution volume. • Ensure workpieces are safely jugged so they cannot fall into the tank. 	<p>If tank is found to be overflowing or leaking, use appropriate safety equipment (see section 7.0) and if safe to do so:</p> <ol style="list-style-type: none"> 1. Stop leak or overflow. 2. Ensure spillage is contained in workshop and spillage tank. 3. Block the waste water drain with spill kit. 4. Pump out leaking tank to spare holding tank. 5. Determine disposal or treatment method. <p>If chromic acid is released due to tank failure and there is a danger that the chemical may leave the building, use appropriate safety equipment (see section 7.0) and if safe to do so:</p> <ol style="list-style-type: none"> 1. Minimise the chemical release with the spill kits. 2. Call fire brigade on 000 if chemical cannot be contained and there is a threat to public health. 3. Call manager if not already on site. 4. Call EPA on 131 555 and report pollution incidents (the date, time, nature, duration, location, estimated volume of chemical pollutants involved and any action taken). 5. Call SafeWork NSW on 131 050 if injuries to staff. 6. Call public health unit Parramatta Office (02) 9840 3603 and ask for Public Health Officer on call.
Storage of Chemicals	Workshop	Leaking or spillage from chemical storage	<ul style="list-style-type: none"> • Spill kit is available. Spill kit training is conducted on regular basis. • All staff trained in the handling and storage of chemicals. • All chemicals to be stored in accordance with 	<p>If a chemical container is found to be leaking, use appropriate safety Equipment (see section 7.0) and if safe to do so:</p> <ol style="list-style-type: none"> 1. Stop leak. 2. Activate spill kit and ensure spillage is contained in bund. 3. Determine disposal or treatment method for spillage.

Pollution Incident Response Management Plan (PIRMP)

			<p>manufacture instructions and SDS.</p> <ul style="list-style-type: none"> • Liquid chemicals are stored on top of spill tray. • All transport of chemicals to be unloaded onto front loading dock only. • All chemicals being used for the day are to be stored in appropriate containers clearly marked. • All spills to be cleaned up immediately. • A SDS Register is kept on site with SDS for each chemical also kept. 	
Water Treatment Tank	Water Treatment Station	Leaking or spillage from Water Treatment Tank	<ul style="list-style-type: none"> • Water treatment area is bunded. • Any spillage will be collected in the bunded area. This bunded areas is not automatically transferred to any other tank, treatment or disposal system. 	<p>If tank or system is found to be leaking, use appropriate safety equipment (see section 7.0) and if safe to do so:</p> <ol style="list-style-type: none"> 1. Stop leak. 2. Ensure spillage is contained in bund. 3. Determine disposal or treatment method for spillage.
Caustic Soda Solution Stripping Tank	3.5m in ground and 1m up ground. located near 1 st side roller door	Leaking or spillage from Caustic Soda Stripping Tank	<ul style="list-style-type: none"> • Caustic soda tank is bunded by a water and alkaline proof concrete tank. Any spillage will be collected in the concrete tank. 	<p>If caustic soda solution is found to be leaking, use appropriate safety equipment (see section 7.0) and if safe to do so:</p> <ol style="list-style-type: none"> 1. Stop leak. 2. Ensure spillage is contained in bund. 3. Determine disposal or treatment method for spillage.
Hydrochloric Acid 33%	2 x Hydrochloric Acid tanks stored inside IBC.	Leaking or spillage from the tank will be contained by IBC.	<ul style="list-style-type: none"> • Spill kit is available. 	<p>If the Hydrochloric Acid tank is found to be leaking, use appropriate safety Equipment (see section 7.0) and if safe to do so and if safe to do so:</p> <ol style="list-style-type: none"> 1. Stop leak. 2. Ensure spillage is contained in bund. 3. Determine disposal or treatment method for spillage
Sodium Metabisulphite powder	Mezzanine floor near water treatment plant	Leaking or spillage from bag	<ul style="list-style-type: none"> • Spill kit is available. 	<p>If the Sodium Metabisulphite tank is found to be leaking, use appropriate safety Equipment (see section 7.0) and if safe to do so and if safe to do so:</p> <ol style="list-style-type: none"> 1. Stop leak and collect powder. 2. Ensure spillage is contained in bund. 3. Determine disposal or treatment method for spillage.

Pollution Incident Response Management Plan (PIRMP)

Spillage or Leak from drum of solid or liquid chemical.	Chemical storage area, plating area of Workshop and mezzanine floor	Spillage or leaking drum when unloading truck or transferring chemicals from storage area to plating area.	<ul style="list-style-type: none"> • Spill kit is available. • Train operators on unloading procedure for trucks with chemicals. • Train operators in spill prevention and clean up procedures. 	Follow spill containment procedure as per Chemical Spill Management Policy
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6.0 Inventory of Pollutants

Inventory of chemicals stored on site

Chemical Name	Class	UN No.	PG	Average Qty	Maximum Storage Qty	Storage Location
Chromic Acid flake	5.1	1463	II	25 kg drum	500kg	Stored and padlocked under front dock
Hydrochloric Acid 33%	8	1789	II	15L jar	150L	Stored upstairs in secondary containers at water treatment station Stored downstairs in corrosive cabinet
Caustic soda flake	8	1823	II	25kg bag	150kg	Stored upstairs at water treatment station in a timber cage
Sodium Metabisulphite	n/a	n/a	n/a	25kg bag	150kg	Stored upstairs at water treatment station on steel shelves
Fumetrol 21	6	2716	III	5L drums	10L	Stored in secondary containers under water treatment station
Methyl ethyl ketone	3	1193	II	20L drum	20L	Stored in flammable liquid cabinet
Sulphamic Acid	8	2967	III	25Kg bag	25Kg	Stored in plastic container with lid
Nickel Chloride	6.1	3288	III	25kg bag	25kg	Stored in plastic container with lid
Boric Acid	1B	n/a	n/a	25kg bag	25kg	Stored in plastic container with lid
Anti-Pit Y17	3	n/a	n/a	25kg bag	25kg	Stored in anti-spillage container near Nickel tank
Sulphuric Acid	8	1830	III	10L container	30L	Stored in secondary container or on the anti-spillage container near the corrosive cabinet

7.0 Safety Equipment to be used in the Event of an Incident

Safety Equipment	Location
Gloves	Main office and inside spill kit
Face Shield	Main office
Apron (refer to SDS)	Main office
Mask if spill is giving off harmful fumes (refer to SDS)	Workshop (stored in closed container)
Safety Data Sheets (SDS)	Main office
Spill kit	Workshop (refer to evacuation diagram)

8.0 Emergency Response and Notification of Pollution Incidents

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If adequate resources are not available to contain the release and

if it threatens public health, property or the environment, the following should be contacted for emergency assistance

- NSW Fire Brigades Ph: 000.
- If required, ask for Police or NSW Ambulance Service.

Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order.

- Environment Protection Authority (EPA)
Ph: 131 555.
- Waste Management Company.
Cleanaway. Phone: (02) 9820 5144
- SafeWork NSW (formerly WorkCover)
Phone: 13 10 50
- Ministry of Health (Public Health Unit is at Westmead Hospital)
Phone: (02) 9840 3603.
After Hours Phone: (02) 9845 5555
Ask for Public Health Officer on call
- Blacktown City Council
Phone: (02) 9839 6000

In addition, if you need urgent advice on cleaning-up the incident or on the disposal of any resulting waste materials, EPA staff can be contacted 24-hours/day via Pollution Line on 131 555.

If the NSW Fire Brigades are called, they may notify the EPA if they consider the environment or public health to be threatened. Notification by the NSW Fire Brigades does not negate the need for CCA Hardchrome to notify the appropriate regulatory authority.

9.0 Emergency Telephone Numbers

Contact	Contact number
Blacktown Fire Station	(02) 9622 8932
Blacktown Hospital	(02) 9881 8000
Poisons Information Centre	13 11 26
Sydney Water	13 20 90
Origin Energy (Electricity)	1300 661 544
AGL (Gas)	131 909
BOC (Gas cylinders)	1800 337 784
Cleanaway (Waste Control)	(02) 9820 5144
Internal Management: James Leach – Chief Executive Officer, Berendsen Fluid Power Luca Ferrari – Operations Manager, CCA Hardchrome	0403 579 798 0476 760 146

10.0 Procedure for Notifying Local Residents and Adjoining Premises

If there is an emergency involving the Emergency Services the following steps shall be taken.

- Call 000 advising them of the situation.
- Upon arrival of the Emergency Services to the site, responsibility for the control of the situation shall be with the Emergency Services and the management of CCA Hardchrome shall render any assistance as required by the Emergency Services.
- If required, CCA Hardchrome management shall provide the telephone numbers of the adjoining properties to the Emergency Services. If nearby factories have to be notified they are as follows :
 - Kings Exhaust
Ph: (02) 9831 3888
6/38 Tattersall Rd, Kings Park NSW 2148
 - Young An Marble & Granite
Ph: (02) 9831 1370
38 Tattersall Rd, Kings Park NSW 2148
 - BKH Group
Ph: (02) 9671 8700
32 Tattersall Rd, Kings Park NSW 2148
 - Corolla Spares
Ph: 0405 106 135
40 Tattersall Rd, Kings Park NSW 2148

11.0 Actions to be Taken During or After a Pollution Incident

In the event of an escape of a chemical spill,

Person who discovers the emergency to:

- Report the incident immediately to the Site Safety Representative and Operations Manager
- If trained, and if safe, take action to stop the leak and prevent any further affect from the emergency or prevent ignition. Refer to section 12.0 for chemical spill management procedure.

Site Safety Representative and Operations Manager to:

- Assess the situation and decide if a spill is major or minor
- Evacuate the area / building if required.
- Call the Emergency Services if required – Dial 000
- Refer to Safety Data Sheets (SDS) for information.
- Monitor safety of control and clean-up operation.
- Contact relevant authorities if required.

In the event a chemical or safety emergency occurs on a delivery of chemicals, the on board truck equipment and CCA Hardchrome equipment should be utilised to control and clean up any spillage.

12.0 Chemical Spill Management Procedure

- Review the Safety Data Sheet (SDS) and assess the size, location and type of chemical involved to determine if you have the equipment and ability to manage the spill without assistance.
- If it is beyond your abilities and equipment report the incident immediately to the Site Safety Representative and Operations Manager, call the Fire Services on 000, evacuate the premise completely and do not proceed on to the steps below. Management will evaluate further action while the emergency response units are arriving. Once the emergency services arrive follow their instructions. Once Spill has been contained and Emergency services have left site, re-establish access to the area.
- Wear appropriate PPE (e.g. goggle, gloves, mask, enclosed shoes)
- If safe to do so immediately stop chemical from leaking or spilling by sealing holes or cracks in containers, standing drum up, shutting valve or replacing lid.
- Evacuate everybody not dealing with the emergency from the immediate area and place temporary barricades/barriers/signage if possible.
- Dike the spill to prevent spreading and to contain the spillage - the outer edge of the spill should be dammed with rags, blankets, sand, sandbags mops and/or absorbent booms.
- Prevent the spillage from entering drains using the method in the above point.
- Clean up the spill – promptly cover the spill using absorbent material such as sand or rags being mindful not to splash the spill.

DO NOT USE A HOSE or WATER TO CLEAN UP SPILL or allow the spill to escape outside the premises (e.g Down driveway into gutter).

DO NOT USE WATER as this will increase the volume of the waste and the potential to flow further into the environment.

- Where possible recover as much material as possible for recycling/reuse by scooping or pumping into drums or tanks.

Pollution Incident Response Management Plan (PIRMP)

- Use a dustpan or spade to scoop up the absorbent sand and place into a labelled container. This waste material is not to be buried or thrown into the environment. The method of disposing of this waste will depend on the amount and the type of chemical that has been spilt. The EPA can advise on the appropriate disposal of Dangerous Goods and Hazardous Substances.
- For oil spillage, place waste oil and used sorbent material in designated containers.
- Dispose of the non re-usable PPE into the designated bins.
- Notify the appropriate authority – if the spill enters a stormwater drain or the open ground, the EPA and the local council must be notified. If there is a risk to health and property call the Fire Services immediately on 000.
- Report the incident as an environmental incident (refer to “Environmental Incident Report Form”) to ensure that it is investigated and corrective/preventive actions are implemented to minimise the potential for it to recur.

13.0 Training

Training will be conducted via,

- Site induction for new and existing employees
- Annual environmental emergency response training
- Annual Spill Kit training

All training records, including the name of the person undertaking training and date of training, shall be maintained on file by Operations Manager.

14.0 Testing, Review and Maintenance

Annual testing of the PIRMP will be undertaken to check that the information is accurate and current and that the plan is capable of being implemented in a workable and effective manner. Testing shall be undertaken in the following ways:

1. The PIRMP will be tested by assessing and reviewing it and making any necessary changes. Testing is taken to be either a desktop review or an environmental emergency drill. Testing will include all components of the plan, including training requirements.
2. A review of the PIRMP will occur every 12 months or within one month of the date of any material harm pollution incident. Contact details in this document must be kept current at all times.

Information to be retained regarding PIRMP testing includes:

- The manner in which the test was undertaken;
- Dates when the plan has been tested;
- The person who carried out the testing; and
- The date and description of any updates of or amendment to the plan.

15.0 Availability of the PIRMP

The PIRMP shall be kept in written form at the premises and shall be made available to all personnel responsible for implementing the plan, and to an authorised officer (as defined in the POEO Act) on request.

Appendix 1 – PIRMP Testing Record

PIRMP Testing Record		
Type of the Test:	<input type="checkbox"/> Desktop Review <input type="checkbox"/> Environmental Emergency Drill	
Date of the Test:		
Name of the person who carried out the test:		
Name of participants:		
Details of incident used for test:		
Description of any updates to the PIRMP:		
Corrective Action	Person Responsible	Completion Date

Appendix 2 – Environmental Incident Response Checklist

Environmental Incident Response Checklist		
Action Item	Time completed	Completed by
Incident Response - Material Harm Pollution Incident		
Report the incident immediately to the Site Safety Rep and Operations Manager.		
Wear appropriate PPE (e.g. goggle, gloves, mask, enclosed shoes, and apron).		
Stop the leak and prevent any further affect from the emergency or prevent ignition, if safe to do so.		
Call the Fire Services on 000 if it is beyond your abilities and equipment to stop the leak.		
Evacuate the premise completely.		
Follow the instructions provided by emergency services.		
Notify the relevant authorities in the following order:		
• Environment Protection Authority (EPA) on 131 555.		
• Waste Management Company Cleanaway on (02) 9820 5144		
• SafeWork NSW on 13 10 50.		
• Ministry of Health (Public Health Unit is at Westmead Hospital) and ask for Public Health Officer on call Phone: (02) 9840 3603 or (02) 9845 5555 during after hours		
• Blacktown City Council on (02) 9839 6000		
Notify local residents and adjoining premises as required.		
Incident Response - Minor Leak or Spill		
Wear appropriate PPE (e.g. goggle, gloves, mask, enclosed shoes, and apron).		
If safe, stop chemical from leaking or spilling immediately by sealing holes or cracks in containers, standing drum up, shutting valve or replacing lid.		
Evacuate everybody not dealing with the emergency from the immediate area.		
Activate spill kit. Dike the spill to prevent spreading and to contain the spillage - the outer edge of the spill should be dammed with rags, blankets, sand, sandbags mops and/or absorbent booms.		
Prevent the spillage from entering drains using the method in the above point.		
Report the incident immediately to the Site Safety Rep and Operations Manager.		
Clean up the spill – promptly cover the spill using absorbent material such as sand or rags being mindful not to splash the spill. NEVER use a hose or water to clean up spill or allow the spill to escape outside the premises (e.g Down driveway into gutter).		
Where possible recover as much material as possible for recycling/reuse by scooping or pumping into drums or tanks		
Place waste material into a labelled container and dispose responsibly.		
Post Incident		
Re-establish access to the area once spill has been contained.		
Complete an Environmental Incident Report and submit to Questas Safety.		
Review PIRMP within one month of the date of any material harm pollution incident.		
Date of the Incident:		Checklist Completed by