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Revision	Description	Prepared by	Approved by	Date Reviewed
1	New document	Lisa Swain	Paul Kohalmi	Feb 2017
2	Updated contact number for local health authority, South Eastern Sydney	Phoebe Choong	David Woodrow	Feb 2018
3	Updated contact number for Bayside Council and Prince of Wales Hospital and safe work.	Phoebe Choong	David Woodrow	Feb 2019
4	Updated and added gas and energy supplier and changed operational days from 7 to 5	Michelle Massey	Phoebe Choong	Feb 2020
5	Updated to new OPAL template, removed ORORA to OPAL, changed the introduction to be included in the overview, included Website information, including updating the plan section, including testing of the plan section, included implementation of the plan.	Michelle Massey	Phoebe Choong	May 2020
6	Updated to include new requirements of section 98C of the POEO Regulations 2009 Added section 3, 4, 5 and 6	Michelle Massey	Michelle Massey	August 2020
7	Reviewed document to ensure all contacts and information are correct. No changes	Michelle Massey	Michelle Massey	January 2021
8	Updated Sydney Water contact number	Phoebe Choong	Colin Nguyen	March 2022
9	6/10/2022- Email from NSW EPA Alert for wet weather and flooding preparation received. A visual site internal and external inspection completed. Stormwater drains and	Anthony Manning	Anthony Manning	October 2022

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	bunds clear. No evidence of waste / wastewater accessing stormwater drains.			
10	Updated Sydney Water Contact	Phoebe Choong	Anthony Manning	27/02/2023

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 Environment Protection Licences (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.

Opal Cartons Botany has an Environment Protection Licence number 1036.

The requirements also include that the following sections of the plan to be made publically available:

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

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

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

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

2. 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. Severe odour emissions are also considered a pollution incident.

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:*
 - 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.*

Section 147 of the POEO Act also states that:

it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs. While this document describes reporting required for all pollution incidents, only those that involve reporting related to "material harm to the environment" constitute activation of the PIRMP.

3. Key parts of the Emergency Plan

This is covered under the OPAL Cartons Botany Emergency Plan section 6.1 and 8. Additional details are included in this document.

4. Coordination with Local Authorities

This is included in section 6.1 of the Emergency Plan.

5. Maps

Maps of the site is located in the Opal Cartons Botany Emergency Plan Appendix 1 and 2 and at the DG manifest at Gate 1.

6. Hazards, Likelihood and Pre-emptive Actions to prevent Pollution incident risks

6.1 Overview

This chapter deals with the POEO regulations 2009 sections 98 a-k. These sections deal with the hazard, likelihood and preemptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimize the risks.

This plans also considers both air and water-based pollution incidents impacts. Overall considerable design and environmental management plans are in place to effectively minimize 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 the incident response methods.

This plan is based on a risk assessment process undertaken summarized in the following document:

- Environmental Aspects and Impacts register

6.2 Summary of Pollution Types

Opal Cartons Botany by 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 OPAL Cartons Botany listed in table 1 below:

Table 1: List of Typical Main Pollutants in Paper Cartons manufacturing

Description	Comments
Air Based Emissions	
Dust	As a result of malfunction of the Cyclone compactors but is covered in maintenance processes.
Fire	Fire is not considered an environmental incident unless it is large enough to threaten human health or neighbouring properties, but the smoke from the fire can be and can affect neighbours. Fire Management is covered under Opal Cartons Emergency manual.
Noise	Emitted by Plant and Equipment. Noise is not considered a pollution incident and not covered further under this Plan.
Odour	Odour would be from the release of significant amounts VOCs but due to low quantities of chemicals that produce VOCs stored on site would be not trigger environmental harm.
Spill type Emissions	
Class 2.1 Flammable gases: <ul style="list-style-type: none"> • LPG (max 2000 litres) • Aerosols (under regulation limits) • Acetylene (maximum 5 size C bottles) 	Fuel for forklifts, welding and spray aerosol cans are the sources her and are covered under: <ul style="list-style-type: none"> Opal Cartons Dangerous Goods notification Chemical Approval system Limited quantities and stock holdings for these gases.
Class 2.2 Non-toxic non-flammable gases <ul style="list-style-type: none"> • Oxygen 	Oxygen bottles are used in the welding processes and only limited quantities of bottles smallest size are held on site. Covered under <ul style="list-style-type: none"> Chemical Approval system Limited quantities and stock holdings for these gases.
Class 3 flammable Liquids egs Fuels, paints, solvents	For plant and equipment operations. Covered under <ul style="list-style-type: none"> Opal Cartons Dangerous Goods notification Chemical Approval system Limited quantities and stock holdings
Combustible Liquids (C1 and C2) Diesel, lubricants and hydraulic oils and greases	For plant and equipment operations. Covered under <ul style="list-style-type: none"> Opal Cartons Dangerous Goods notification Chemical Approval system Limited quantities and stock holdings

	Majority Food Grade compliant products Stormwater control management and Spill response control measures
Class 8 Corrosive Substances	Use of dangerous goods varies on site and covered in: Opal Cartons Dangerous Goods notification Chemical Approval system Limited quantities and stock holdings Stormwater control management and Spill response control measures
Wastes (includes solid, liquid and hazardous wastes)	Storage of wastes and wastes containing chemicals. Covered under: Opal Cartons Site emergency manual Waste management procedure
Aqueous wastes, wastewaters and aqueous potential pollutants	Management of aqueous liquids on site are covered under: Chemical Approval system Stormwater control management and Spill response control measures Gross pollutant trap on site Bunded areas

6.3 Use and Storage of Hazardous Chemicals Safety Issues

Storage and handling of substances which may cause pollution are divided into two areas:

- Hazardous substances – covered by occupational health and safety requirements
- Non-hazardous and aqueous based substances
- Hazardous chemicals are documented and itemized in accordance to the Work Health and Safety Regulations 2017. The specific hazardous and non- hazardous chemicals documents are identified in Table 2 below:

Table 2: Reference Documents to Inventory of Pollutants

Document Name	Relation to this Plan
Dangerous Goods and Hazardous Chemicals	Overarching management of safety including for pollutants on site
Chemical Approval	Overarching management of safety including for pollutants on site and safety measures prior to the introduction of a new chemical for use on site. Record keeping of chemicals used
Emergency Procedure	Overarching management of emergency management on site
Opal Cartons Botany Dangerous Goods notification	Quantities of dangerous goods on site Site maps Location of dangerous goods

6.4 Risk Assessment and Control Measures (pre-emptive actions)

Assessment analysis and control measures to minimize or prevent any risk of harm to human health or the environment arising out of the relevant activity are required under the overarching documents in the table 3 below:

Table 3: List of Documents covering Environmental risk Assessment and Control Measures

Document Name	Relation to this Plan
Environmental Aspects and Impacts Register	Provides register of business aspects and environmental aspects Scoring system for assessing risk Control measures
Chemical Approval	Risk assessments for each chemical bought onto site
Spill Prevention and Control	Management of uncontrolled and contained spills on site
Waste and Recycled materials	Management of waste generation and correct disposal.

6.5 Hazard Assessment, Inventory, Early Warnings and Pre-Emptive Actions

Table 4 below provides a breakdown of the coverage of the regulatory requirements according to the POEO Regulations 2009 by section to this part:

Table 4: Risk module Coverage of the POEO Regulations 2009

Section	Item heading	Covered By
98C (a)	Hazard assessment	Aspects and impacts register with corrective actions
98C (b)	Likelihood assessment	Aspects and impacts register with corrective actions
98C	Pre-emptive actions	Aspects and impacts register with corrective actions
98C (d)	Pollution Inventory Types	List of polluting substances and storage and covered under hazardous chemicals
98C (e)	Pollution Inventory Quantities	List of chemical substances and storage on site and covered under hazardous chemicals with regards to maximum quantities stored
98C (f)	Safety equipment	List of polluting control equipment on map plus List of chemical substances and storage on site and covered under hazardous chemicals with regards to maximum quantities stored
98C (g)	Contact Details of activating plan	Listed in emergency manual List of polluting substances and storage and covered under hazardous chemicals

98C (h)	Contact details of relevant authorities	Listed in emergency manual List of polluting substances and storage and covered under hazardous chemicals
98C (i)	Early Warnings Neighbours	List of polluting substances and storage and covered under hazardous chemicals – need to warn neighbours early in any Pollution incident
98C (j)	Staff safety	Listed in emergency manual List of polluting substances and storage and covered under hazardous chemicals
98C (k)	Map location of pollutants	Listed in emergency manual appendix 1 and 2.

The above legal requirements are covered under the following documents:

- Opal Cartons PIRMP
- Emergency Manual
- Environmental Impacts and Aspects Register
- Chemical Approval register

7. Immediate notifications of incident to relevant authorities

Opal 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).
- Safe Work NSW.
- Fire and Rescue NSW.
- Sydney Water.
- Ausgrid
- Jemena (gas)

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	95407756
	Prince of Wales Hospital	9382 2222

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SERVICE	DESCRIPTION	NUMBER
Ministry of Health		9391 9000
Bayside City Council	Local Authority	1300 581 299
Safe Work NSW	Compliance and Safety	13 10 50
Sydney Water	Local Authority	13 20 90 (24/7) & 13 20 92
Ausgrid	HV Energy Supplier	13 13 88
Jemena (Gas)	Gas Supplier	131 909

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.

8. Potential scenarios for a pollution incident

The potential scenarios which may lead to a pollution incident at Opal 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 Opal Cartons Botany. Appropriate controls to manage and mitigate the identified hazards will be implemented.

9. 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 Opal 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 5 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:

- 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.

Releases must be approved by the General Manager.

9.1. Website information

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:

- (2) A plan is also to 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.
- (3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:
- (a) section 153C(a) of the Act, and
 - (b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).

Unlike the EPL this Plan is to only be available to those who are to implement the Plan. This is made clear by The POEO (General) Regulation 2009 s98D(3) which States:

- 4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).

If components of the Plan are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative Plans with such sensitive information removed (e.g. contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

10. Updating of Plan

Effective date: 15 January 2021

Review date This Plan will be updated according to the following:

- 12 months from the last update;
- Within one month of a material harm Incident
- As identified after testing of the Plan

11. Testing

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) *regularly 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*

Testing of the Plan will be integrated into other emergency and incident testing and training programs where possible.

Records of the testing will be kept by Safety & Compliance Manager.

Testing dates

This Plan will be tested according to the following:

- 12 months from the last test, or
- Within one month after a material harm Incident.

Recording of Testing

A 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 updated and or other appropriate non-conformance actions will be undertaken.

12. Implementation of the Plan

The POEO Act 1997 s 153F requires the Plan be implemented if a pollution incident occurs. \$2 million maximum fines apply for failing to implement the Plan.

Hence if a material harm pollution incident occurs:

- It must be responded to according to this Plan and its reference documents.

This document is not a controlled document unless stamped to indicate controlled.

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- An incident response report be completed