



MIROTONE

Pollution Incident Response Management Plan

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

MIROTONE – REVESBY

UPDATED 28th March 2018 BY JOHN DAVEY



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Pollution Incident Response Management Plan

1. Purpose

The purpose of Mirotone's Pollution Incident Response Management Plan is to improve the way pollution incidents are reported, managed and communicated to the general community. The plan is designed to facilitate better coordination with the relevant response agencies.

This document covers chemical spill management and the Emergency Response Plan.

2. Legislative Requirement

In accordance with Part 5.7A of the Protection of Environment Operation Act 1997 and the Protection of the Environment Operations (General) Regulation 2009 holders of an EPA

Environment Protection Licence (EPL) are required to:

- prepare a Pollution Incident Response Management Plan (section 153A, POEO Act). This plan will form part of Mirotone's Emergency Procedures Manual.
- test the plan in accordance with the POEO Regulation (clause 98E).
- report pollution incidents immediately to the appropriate authority.
- notify all relevant authorities about the incident under the POEO Act. For Mirotone authorities include the EPA, WorkCover NSW, Emergency Services, Ministers Officer and Bankstown City Council. This will ensure that the appropriate agencies have the information they need to respond promptly and without delay.

Penalties exist under the POEO Act for failing to comply with this requirement.

3. Licence Details

Mirotone holds an:

Environment Protection Licence (Number: 2586).

Work Cover – Notification of Dangerous Goods on Premises (NDG200199)



4. Definition

A pollution incident is:

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 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.

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 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.

Immediately

Immediately is defined as promptly and without delay. For the purposes of external notification, Mirotone is required to notify external authorities within 1 hour of learning that the incident has occurred.

Refer to Section 4.7

Management Action

Ensure the area to safe and secure to approach.

Locate the source of the spill and identify if any hazardous materials are involved.

Locate Material Safety Data Sheet (MSDS) for the substance (if known) to obtain information about clean-up procedures and advice on appropriate Personal Protection

Equipment that may be required.

Take steps to prevent unauthorised staff or visitors' access.

Assess potential harm and minimise environmental contamination. i.e. ensure substance is prevented from entering water body using spill kit, hay bales or other suitable absorbent material.



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Disposal & Incident Reporting

Ensure environmentally responsible disposal of contaminated material as per the MSDS, HR Chemical Management Policy and relevant legislation.

Disposal must be arranged with an EPA licensed contractor.

An Environment Incident and/or WHS Incident Form must be completed in accordance with Mirotone's internal incident reporting procedures.

4.1 4.2 Risk Assessment & Management Plan

This section includes identification, description and likelihood of the primary hazards to human health or the environment associated with operation of the waste water treatment plant.

Mirotone's Factory is located adjacent to a storm water channel and adjacent to commercial activities. All care must be taken to ensure both environmental and health risks are eliminated or mitigated in accordance with factory management.

Activity	Potential Hazard	Risk Score	Pre-Emptive Actions	Community Notifications
Chemical storage	Chemical Spill	Medium	All chemicals stored in bunded area to contain any spills. Spill kits are available to absorb spill.	Website
Chemical use	Chemical Spill	Medium	All Chemical are handled in accordance with standard operating procedure to minimise potential to spills and exposer.	Website
Bulk Deliveries	Chemical Spill	Medium	Deliveries are received by a trained personnel and conducted in accordance with standard operating procedures. Discharge areas are temporally bunded during a delivery to stop spills leaving the site.	Website (when required)
Forklift	Chemical Spill & Fire	Low	Forklift are maintained and operated by trained licensed staff in accordance with standard operating procedures. Spill kits are located near high traffic loading and unloading areas to contain a spills. Forklift start up and shut down producers are done daily to eliminate potential risks of fire.	Website (when required)



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4.3 Inventory of pollutants

Storage facility identifier	Type of storage facility			
B	UNDERGROUND TANK			
Class	Maximum storage capacity		Unit	
3	78,500		L	
UN Number	Class	Typical Qty	Unit	Packing Group
1090	3	4,500	L	II
Proper Shipping Name				
ACETONE				
Product or common name				
ACETONE				
UN Number	Class	Typical Qty	Unit	Packing Group
1123	3	18,000	L	II
Proper Shipping Name				
BUTYL ACETATES				
Product or common name				
BUTYL ACETATES				
UN Number	Class	Typical Qty	Unit	Packing Group
1193	3	11,000	L	II
Proper Shipping Name				
ETHYL METHYL KETONE				
Product or common name				
MEK				
UN Number	Class	Typical Qty	Unit	Packing Group
1219	3	4,000	L	II
Proper Shipping Name				
ISOPROPANOL (ISOPROPYL ALCOHOL)				
Product or common name				
I.P.A				
UN Number	Class	Typical Qty	Unit	Packing Group
1294	3	19,000	L	II
Proper Shipping Name				
TOLUENE				
Product or common name				
TOLUENE				



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UN Number	Class	Typical Qty	Unit	Packing Group
1170	3	12,000	L	II
Proper Shipping Name				
ETHANOL (ETHYL ALCOHOL)				
Product or common name				
IMS 100				
UN Number	Class	Typical Qty	Unit	Packing Group
1307	3	10,000	L	III
Proper Shipping Name				
XYLENES				
Product or common name				
XYLENE				
Storage facility identifier	Type of storage facility			
C	ROOFED STORAGE			
Class	Maximum storage capacity		Unit	
4.1	11,000		L	
UN Number	Class	Typical Qty	Unit	Packing Group
2556	4.1	11,000	L	II
Proper Shipping Name				
NITROCELLULOSE WITH ALCOHOL				
Product or common name				
NITROCELLULOSE				
Storage facility identifier	Type of storage facility			
A	ROOFED STORAGE			
Class	Maximum storage capacity		Unit	
3	83,000		L	
UN Number	Class	Typical Qty	Unit	Packing Group
1123	3	2,000	L	II
Proper Shipping Name				
BUTYL ACETATES				
Product or common name				
BUTYL ACETATES				
UN Number	Class	Typical Qty	Unit	Packing Group
1120	3	10,000	L	III



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Proper Shipping Name				
BUTANOLS				
Product or common name				
N BUTANOL				
UN Number	Class	Typical Qty	Unit	Packing Group
1173	3	1,000	L	II
Proper Shipping Name				
ETHYL ACETATES				
Product or common name				
ETHYL ACETATE				
UN Number	Class	Typical Qty	Unit	Packing Group
1193	3	2,000	L	II
Proper Shipping Name				
ETHYL METHYL KETONE				
Product or common name				
MEK				
UN Number	Class	Typical Qty	Unit	Packing Group
1268	3	2,000	L	II
Proper Shipping Name				
Petroleum distillates, n.o.s. or petroleum products, n.o.s.				
Product or common name				
SOLVENTS				
UN Number	Class	Typical Qty	Unit	Packing Group
1993	3	18,000	L	II
Proper Shipping Name				
Flammable liquids, n.o.s				
Product or common name				
RESIN				
UN Number	Class	Typical Qty	Unit	Packing Group
1245	3	1,000	L	II
Proper Shipping Name				
Methyl isobutyl ketone				
Product or common name				
M.I.B.K				
UN Number	Class	Typical Qty	Unit	Packing Group
1148	3	2,000	L	III
Proper Shipping Name				
Diacetone alcohol				



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Product or common name				
Diacetone alcohol				
UN Number	Class	Typical Qty	Unit	Packing Group
1212	3	2,000	L	III
Proper Shipping Name				
Isobutanol or isobutyl alcohol				
Product or common name				
Isobutano				
UN Number	Class	Typical Qty	Unit	Packing Group
1268	3	2,000	L	III
Proper Shipping Name				
Petroleum distillates, n.o.s. or petroleum products, n.o.s.				
Product or common name				
SOLVENTS				
UN Number	Class	Typical Qty	Unit	Packing Group
1866	3	32,000	L	III
Proper Shipping Name				
Resin solution, flammable				
Product or common name				
RESINS				
UN Number	Class	Typical Qty	Unit	Packing Group
1993	3	2,000	L	III
Proper Shipping Name				
Flammable liquids, n.o.s				
Product or common name				
RESIN				
UN Number	Class	Typical Qty	Unit	Packing Group
3077	9	2,000	L	III
Proper Shipping Name				
Environmentally hazardous substance, solid, n.o.s.				
Product or common name				
HEUCOPHOS ZPO				
UN Number	Class	Typical Qty	Unit	Packing Group
3082	9	5,000	L	III
Proper Shipping Name				
Environmentally hazardous substance, liquid, n.o.s.				
Product or common name				
U.V RESINS				

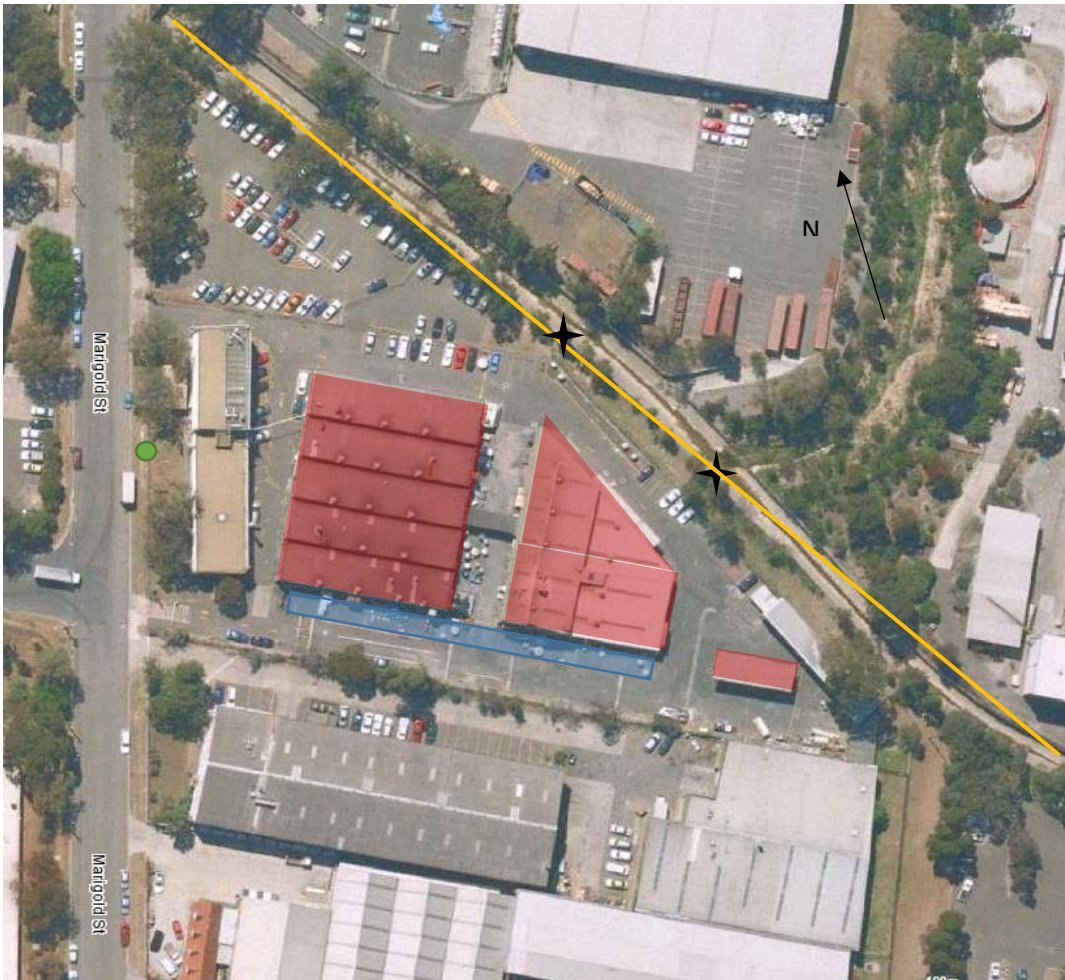







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Site Map

21 Marigold Street Revesby NSW 2212



-  Bunded, manufacturing and storage Areas A, C
-  Storm water discharge point
-  Storm water channel
-  Underground storage tanks Area B
-  Assembly Point



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4.4 Safety equipment

Safety Equipment	Description	Location
Chemical MSDS	Information regarding chemicals	Located in the Emergence Box or on the Mirotone computer file system
Leak detection for solvent tanks	Leak detection system for underground storage	Production Managers Office
Spill kits	Equipment to absorb spills at designated locations	Production Managers Office
PPE	Personal protection equipment which is required in accordance with MSDS specifications	Production Managers Office

4.5 Emergency Contact Details

Name	Position	Contact Number
Lyndon Bailey	Group Technical Manager	0412 841 114
Stephane Suzor	Operations Manager	0481 503 620
David Morris	Warehouse Manager	02 9728 5571
24 hr Security	Security Company	1300 133 343

Secondary Emergency Contact

The following people must be notified of an incident in order to ensure the relevant authorities are notified in accordance with the legislation

Name	Position	Contact Number
Customer Service		02 9795 3718
Emma Tune	Marketing Manager	0412 174 474

Notification

Under section 148 of the POEO Act Mirotone is required to report pollution incidents immediately to all five relevant authorities.

Authority	Contact Number
EPA	131 500
NSW Health	9391 9000
Fire & Rescue, Police	000
Workcover NSW	131 050
Bankstown City Council	(02) 9707 9999



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4.6 Communications with the Local Community

Mirotone is committed to ensuring that those in our local community who may be potentially impacted by a pollution incident are adequately notified. Notifications to the community is the responsibility of Mirotone's Management Team and would be undertaken via Mirotone's website and Bankstown City Council, where considered appropriate

Complaints

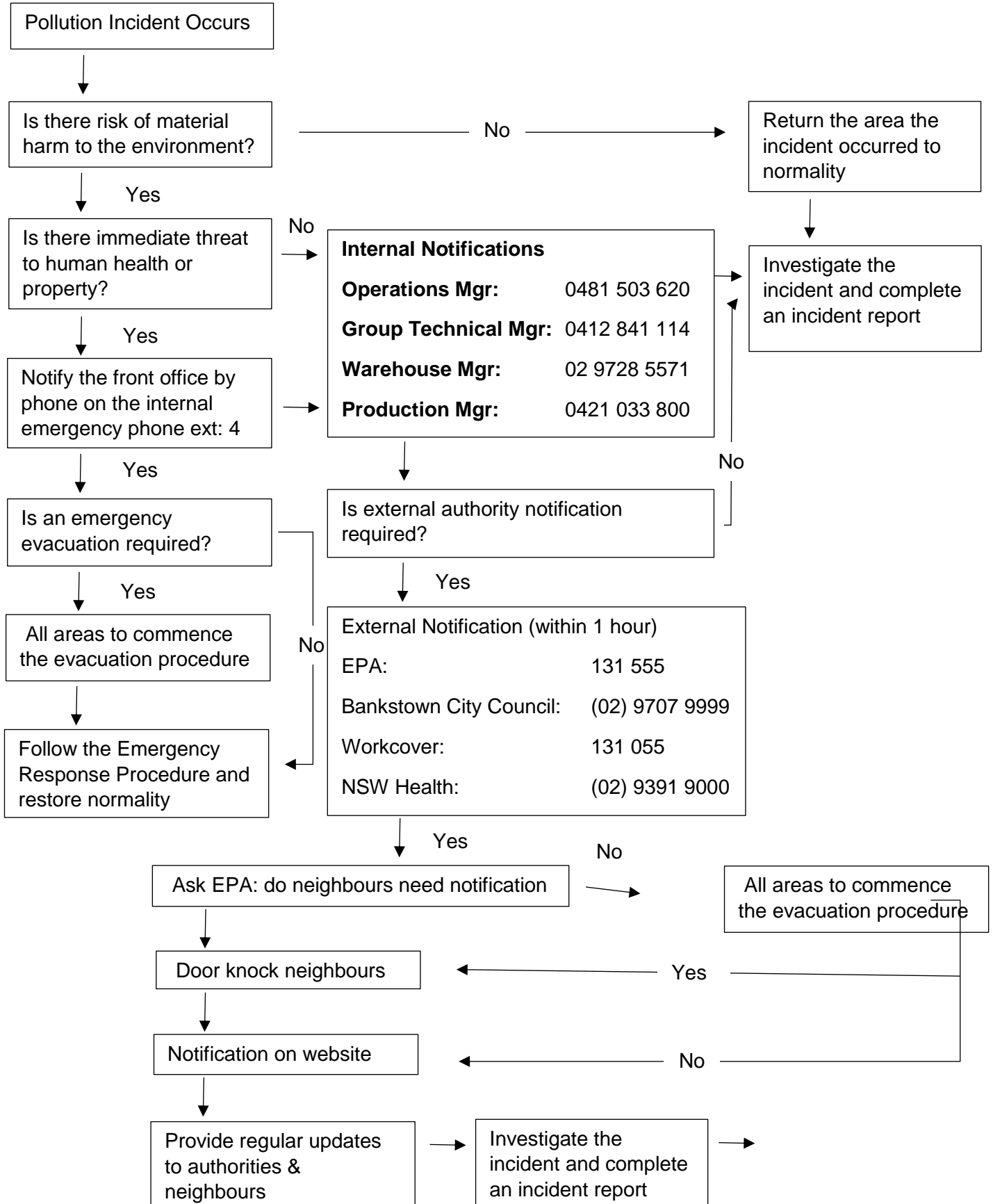
Complaints can be made directly to Mirotone in writing to webmaster@mirotone.com.au or by phone on (02) 9795 3700



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Pollution Incident Response Flowchart





4.7 Revesby Emergency Evacuation Plan

HOW TO RAISE THE ALARM

In the event of a site emergency any employee may raise the alarm as follows:

1. Call the attention of nearby employees to the emergency situation, and if the emergency cannot be managed by the Fire Crew or First Aid Crew,
2. Activate the factory alarm button, if safe to do so.
3. Notify the front office on internal emergency number "4" and state the following
 - a. exact location of the incident;
 - b. the nature and extent of the incident; and
 - c. whether First Aid or Emergency Services are required.
4. Front office will activate a second audible alarm as well as contact emergency services by dialling 000,
5. Front office will identify an Emergency Coordinator to assist at the incident scene with the management of the incident.
 - a.
6. If the front office is not attended any employee can contact emergency services on 000 (first dial 0 for an outside line).

Emergency Assembly Points

Vehicle Exit Gate (Northern Gate)

- R&D personnel.
- Factory, Warehouse and QC personnel.
- Operations personnel.

Middle Gate (Opposite the main office entry)

- Administration/Finance/Marketing personnel.
- Sales/Tech Service personnel.

Once staff is assembled at the Emergency Assembly Points, a Customer Service Representative will call the roll for all office based personnel. Roll call for factory based personnel (including warehouse and colour services) is the responsibility of the Production Manager.

If staff is unaccounted for, the Emergency Coordinator must be advised.

Once all staff has been accounted for the Emergency Coordinator must be informed.



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EMERGENCY SHUTDOWN ACTIVITIES – WHERE SAFE TO DO SO

All Personnel

- Do not attempt to drive vehicles off-site in the event of an emergency.
- Delivery Drivers must be instructed to leave their vehicles and depart the site.
- In the case of bulk tanker deliveries, the driver should make safe his tanker, shut down any mobile pumps but make no attempt to remove the vehicle from the site. The driver should be escorted off the site and await further instructions at the Emergency Assembly Point.
- Check that site visitors, customers, delivery drivers etc in your area are completing safe shutdown of their activities and evacuating the site.

Office Personnel

- Close all doors – windows need not be closed.
- Turn off all electrical equipment but leave the lights on.
- The above should be completed only if safe to do so.

R&D Personnel

- Close all doors - windows need not be closed.
- Turn off all electrical equipment but leave the lights on.
- Cover all open containers of flammable liquids.
- The above should be completed only if safe to do so.

Factory Personnel

- Switch off all manufacturing equipment; dispersers, pumps, fans, compressor etc
- Execute the electrical switchboard shutdown procedure.
- Cover all open factory tanks.
- Check that site visitors in the area are aware of what to do and escort them to the Emergency Assembly Point.
- The above should be completed only if safe to do so.

Warehouse Personnel

- Close all windows and doors including fire doors.
- Execute the electrical switchboard shutdown procedure
- Turn off all electrical equipment but leave the lights on.



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Customer Service Staff

- Activate the night switch & take the following with you:
 - Visitor book,
 - Front office mobile phone,
 - Mirotone's raw material MSDS CD
 - Office staff list and conduct a role call at the assembly point.
 - First Aid Kit
 - Pollution Incident Response Management Plan x2

Responsibility

The Emergency Coordinator is responsible for the site until he or she determines the emergency is over. No staff are permitted back onsite until the Emergency Coordinator has deemed the emergency over and is safe to return.

The Emergency Coordinator may delegate responsibilities to suitable staff members if required during the Emergency.

4.8 Training & Awareness

Employees

Training and Awareness sessions will be held with key stakeholders upon implementation of the PIRMP. A structured information package will also be included into Mirotone staff Induction program. All training records are held with Human Resources.

Contractors

Contractors will be made aware of the PIRMP requirements via Conditions of Entry for Working on site at Mirotone and Induction. Records are held with Production Manager.

5.0 Requirements of the Plan

This plan is effective from 1 September 2012.

A copy of this plan must be forwarded to the relevant response agencies in written form. The plan must also be available at Mirotone (located the red folder in the front office) and be available to be provided to an authorised EPA officer on request.

A copy of the current license must be kept with this plan and be available to an authorised EPA officer on request.



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TESTING

Date	Time	Comments
16-1-2014	10:45am	Emergency Smoke Alarm activated due to work conducted in a non-hazardous area.
17-10-2014	11:15am	Alarm activated: Fire in neighbours property
28-03-2018	5:00pm	Staff Updates