

1. PURPOSE

The purpose of the Pollution Incident Response Management Plan (PIRMP) is to illustrate how Geelong Leather Culcairn ('GLC') will respond to a potential environmental incident and be compliant under the Protection of Environment Operations Act 1997.

2. DEFINITION OF POLLUTION INCIDENT

The definition of a pollution incident is:

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.

3. SCOPE

This plan is applicable to all workers, managers, contractors and visitors at GLC.

4. PROCEDURE

- 4.1 The GLC Pollution Incident Response Management Plan is to be used for supporting the planning, maintenance and safe response to incidents, and consider site specific requirements in conjunction with the site *"Emergency Preparedness Procedure"*.
- 4.2 Maintenance of the GLC Pollution Incident Response Management Plan shall be in accordance with the applicable sections of the GLC Environmental Procedures and the site specific EPA NSW Licence (3465) requirements.
- 4.3 The plan must comply with the new requirements introduced by the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). The Act includes a new requirement under Part 5.7A of the *Protection of the Environment Operations Act 1997* (PEO Act) to prepare, keep, test and implement a pollution incident response management plan.
- 4.4 The plan must be tested and routinely reviewed at least once every 12 months. Testing and review must cover all components of the plan including the effectiveness of training. Records of the testing, revision and updates made must be dated including Workers who performed the testing, revision and updates. In the instance where a potential pollution incident may have occurred, the

plan is to re-test and review within one month of the incident occurring. All records of updates are to be maintained.

- 4.5 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.
 - (c) Pollution Incidents covered by this plan include:
 - a) Fire;
 - b) Explosion; and
 - c) Hazardous material spill/toxic emissions.

5. SITE LOCATION & MAPS

Geelong Leather Pty Ltd
116 Schnaars Road
Culcairn NSW 2660
Australia
Site phone number: (02) 6014 4710

REFER ATTACHED SITE MAPS:

Dangerous Goods Depots Site Plan – Figure 2
Drainage Site Plan – Figure 3
Wastewater Plant – Figure 4
Emergency Evacuation Site Plan – Figure 5

6. DESCRIPTION OF SURROUNDING AREA

6.1 Facility and Schedule of Exercises

The Tannery is situated 4km outside Culcairn, a small country town in the south east Riverina region of New South Wales. Culcairn is located in the Greater Hume Shire Council Local Government area on the Olympic Highway between Albury and Wagga Wagga.

The plant facility can be described as follows:

- a) Office Block – Administration and Management;
- b) WHS/QA Office;
- c) WHS/QA Administration Office;
- d) Training Room;
- e) Main Factory – 6 x Olcina Tanning Drums, 2 x Processors; Samming Machine, Wetblue Storage racking, Automatic Hide Stacker;
- f) Preserving Area – 4 x Mixers
- g) Fleshing Shed – Fleshing Machine and continuous chain systems
- h) Chillers – 4 x chillers used for storage of green hide receivals, fleshed production, ice, head pieces and tallow;
- i) Chemical Storage Shed – Storage of all powdered tanning process chemicals. This also includes all receivals and dispatch of chemicals (Depot 3 and Depot 3A);
- j) Chemical Weighing Shed – Preparation of all powder chemicals for tanning process (storage of 1 ton or less per powder chemical);
- k) Transit Shed – storage of salted sheepskin pallets and any other items not destined for the tannery in transit between sites;
- l) Laboratory – Daily analytical Wetblue sample testing;
- m) Wastewater Shed – Preparation of all wastewater treatment chemicals, storage of all wastewater chemicals and general administration of the wastewater plant;
- n) Wastewater Plant
 - i. Chrome water treatment ~ 1 x collection pit, 1 x clarifier, 1 x settling cone, 1 x fat tank and 1 x filter press.
 - ii. Non-chrome water treatment ~ 2 x collection pits, 1 x clarifier, 1 x sludge tank, 1 x supernatant tank and 3 x irrigation tanks;
- o) Maintenance Workshop – daily preventative maintenance operations as well as storage of all machine spares for the factory.

6.2 Environmental Receptors

6.2.1 Piezometers

The tannery is situated on 470¹ ha of farming land. Thirteen² Groundwater Monitoring points (piezometers) are strategically placed in and around the perimeter of the fence line which enables Geelong Leather to monitor our underground aquifer.



6.2.2 Tannery Spill Containment Moat

The tannery is surrounded by a clay lined moat with a sump on the corner of the unused evaporation pan. In the event of any large scale spills³ that reach the moat, the spill will flow to the sump and be pumped back into the non-chrome pit.

After a spill the moat must be flushed and any contaminated soil remaining must be removed and treated for disposal⁴.

¹ Tannery Farm = 285 ha and Buchlyvie Farm = 185 ha

² Tannery Farm = 8 Piezometers and Buchlyvie Farm = 5 Piezometers

³ Large scale spills refer to potential failure of irrigation tank or overflowing sludge tanks but not limited to large scale liquid chemical overflows of concrete drains behind Depot 2.

⁴ SOP_WW 3 - Emergency Response to Wastewater Spillage

During large rain fall events the valves can be changed to allow water to be pumped into the unused evaporation pan. Geelong Leather is not connected to a stormwater system and therefore has to discharge excess rainfall to the unused evaporation pan. A red flashing beacon will be activated by the change in valve settings to indicate that the sump is directed to the dam instead of the Wastewater plant.

The below image shows the spill containment moat (green line) surrounding the factory. The sump pump (red line) in the south western corner of the moat illustrates the pipelines either to the onsite wastewater treatment plant or the unused evaporation pan. Refer to **Figure 3** for further drainage details.



6.3 Geology and Regolith

Unconsolidated riverine deposits of clay, silt, sand and gravel including the floodplain, ancient channel deposits and alluvial terraces.

6.4 Topography

The Tannery Farm is an extensive (<5 km wide) level alluvial plains of Billabong Creek near Culcairn. Slopes range 0-2%, local relief is <5m and altitude ranges 200-250m. The typical landform elements include extensive to broad plains with deeply incised sparse drainage lines.

The Buchlyvie Farm is rectangular shaped, predominately flat with a very slight 1-1.5% fall. The north western corner has a small short drain which runs across the paddock towards the culvert under the road. The land has a number of old eucalyptus trees, but mostly grey box trees. The soils are mostly a heavy sodosol grey clay.

6.5 Vegetation

The native vegetation is dominated by eucalypts. Eucalypts are the largest tree family in Australia and have adapted to Australia's climatic regions developing more than 900 separate species.

Examples of some species surrounding Culcairn's area are: extensively cleared *Eucalyptus Blakelyi* (Blakely's red gum) and *E. melliodora* (yellow box) woodland, with *E. macrocarpa* (grey box), *E. albens* (white box) and *E. Bridgesiana* (apple box), *E. camaldulensis* (river red gum) occurs along the creeks.

6.6 Land Use of the Region

The land is used mainly for cereal and canola cropping with sheep and cattle grazing on improved pasture. Some areas along large gullies have been fenced off and left to native vegetation.

Doughty, D, 2003, Soil Landscapes of the Holbrook-Tallangatta 1:100 000 Sheet; Depart of Sustainable Natural Resources, Sydney.

7. OVERVIEW OF ACTIVITIES ON SITE

- 7.1 Hides processed at GLC are obtained mainly from a variety of abattoirs in the NSW and VIC districts and processed to the stage of treatment known as “Wet Blue”.
- 7.2 The actual step by step process begins by receiving fresh hides from the abattoirs after a day’s kill.
- 7.3 The hides are then preserved and washed in mixers that same night and stored in a chiller until ready for the fleshing operation the following day.
- 7.4 The fleshing operation removes as much of the fat and unwanted trimmings (fleshing) from the hide as possible. Fats and trimmings from the fleshing operations are further recycled within the surrounding district as tallow.
- 7.5 After fleshing, the hides are stamped for traceability before they are treated and processed in large drums to remove hair and any remaining cellular proteins. They are then chemically treated to the standard known as “Wet Blue”.
- 7.6 The wetblue hides are then removed from the drums and passed through a revolving wringer known as a Samming Machine. After the Samming operation, the wetblue hides weighed, measured, graded and packed ready for Full Substance Grading Shipment.
- 7.7 With the on-site wastewater treatment plant, **Figure 4** GLC more than meets environmental guidelines for wastewater discharge levels for irrigation and sludge injection.

8. CONTACTS AND SITE LIST

- 8.1 The protocol for Industry Notification of Pollution Incidents (Part 5.7 of the POEO Act) requires that the occupier of premises, the PCBU or any person carrying on the activity which causes a pollution incident to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened.
<http://www.environment.nsw.gov.au/pollution/notificationprotocol.htm>
- 8.2 Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

8.3 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:

- a) The Appropriate Regulatory Authority (ARA) for the activity under the POEO Act (usually the EPA or local authority) – the local authority is a local council of an area under the Local Government Act 1993)
- b) The EPA, if it is not the ARA – phone Environment Line on 131 555
- c) The Ministry of Health via the local Public Health Unit
(www.health.nsw.gov.au/publichealth/infectious/phus.asp)
- d) SafeWork Authority – phone 13 10 50
- e) The local authority if this is not the ARA
- f) Fire and Rescue NSW – phone 000

8.4 Site Contacts

SITE CONTACT LIST		
NAME:	TITLE:	CONTACT NO:
Jay Stottelaar	Plant Manager	0409 990 238
Will Hamilton	Maintenance Manager	0411 072 203
Kade Sadler	Production Manager	0439 001 574
Claudio De Brito	Technical Manager	0413 165 725
Brendan Hodges	Drum Supervisor	0439 173 957
Matt Woodford	Chief Fire Warden	0407 880 609
Tara Jongeneel	Deputy Chief Warden	0401 521 608

9. ENVIRONMENTAL INCIDENT

9.1 In the event of an environmental incident or emergency, communication is essential to ensure an efficient response to the incident / emergency. This will assist in minimising the effects of the incident while at the same time maximising the preservation of life. Refer to **Figure 5** for emergency evacuation routes.

9.2 All personnel need to comply with *SOP_WW 3 - Emergency Response to Wastewater Spillage* and *WHS 29 - Emergency Hydrogen Sulphide Gas Procedure* in conjunction with *EMS 20 - Pollution Incident Response Management Plan* as follows:

- a) **ALARM SYSTEM** – An **alert signal** is a continuous repeating signal which means “**move to the nearest designated assembly area**”.
- b) **STANDARD ORDERS** – Standard orders covering emergency procedures are posted on notice boards throughout the site. These standard orders contain brief instructions, emergency contact numbers and evacuation points.
- c) **REPORTING** – Any emergency situation should be reported immediately to the Chief Warden, Deputy Chief warden and/or Area Warden. Injury to employees as a result of the emergency shall be reported in accordance with the Incident Reporting and Investigation Procedure.
- d) **RAISING THE ALARM** – In the case of an emergency the site alarm will be activated. The alarm is located in the factory under the Main Preserving Area Door next to delivery notice board.
- e) **ASSEMBLY POINTS** – Assembly points are highlighted on the floor plans of each area and these are located on plant notice boards. Assembly points ensure wardens can take an initial count of personnel.

10. DANGEROUS GOODS AND HAZARDOUS SUBSTANCES ON SITE

10.1 Wastewater Chemicals

The chemicals are specifically used in the wastewater operation (Refer table below).

POLLUTANT	STORAGE LOCATION	AMOUNT STORED
Causmag XLM	Wastewater Shed	4000 kg
Lime	Wastewater Shed	1000 kg
Manganese Sulphate	Wastewater Shed	1000 kg
Cationic Polymer; Non chrome effluent	Wastewater Shed	500 kg
Anionic Polymer; Chrome effluent	Wastewater Shed	500 kg
Defoaming Agent	Wastewater Plant – Irrigation tanks 1, 2, 3	1000 Lt

10.2 Wetblue Production Chemicals

Several chemicals are specifically used in the wetblue production operation (Refer table below).

For exact storage location refer to the Dangerous Goods site map, **Figure 2**.

DEPOT #	STORAGE TYPE	CHEMICAL CLASS	AMOUNT STORED	CHEMICAL TYPE
1	Above Ground Tank	Class 2.1	2,275 Lt	Liquefied Petroleum Gas
2	Roofless Store - Dosing	Class 8 PGII, PGIII	6,000 kg	Corrosive Liquid NOS
2a	Roofless Store - Storage	Class 8 PGII, PGIII	28,000 kg	Corrosive Liquid NOS
3	Roofed Store	Class 8 PGII	80,000 kg	Sodium Sulphide Hydrated Sodium Hydrosulphide
3a	Roofed Store	Class 5.1 PGII	18,000 kg	Sodium Carbonate Peroxyhydrated
4	Above Ground Tank	Class 8 PGII	33,000 kg	Sulphuric Acid 73%
5	Above Ground Tank	Class 2.2	12,500 kg	CO2 Bulk Storage

10.3 Wastewater Pollutants

Holding tanks for treatments and storage of irrigation effluent, chrome effluent and sludge are specifically used in the wastewater operation. Refer to **Figure 4**, for tank locations.

POLLUTANT	WASTEWATER STORAGE LOCATION	AMOUNT STORED
Untreated Chrome effluent	Chrome Collection Pit	65,000 Lt
Untreated Chrome effluent	Chrome Fat Tank	40,000 Lt
Treated Chrome effluent	Neutralizing Tank	9,000 Lt
Treated Chrome effluent	Chrome Clarifier	15,500 Lt
Treated Chrome effluent	Chrome Settling Cone	26,000 Lt
Treated Chrome effluent	Chrome Plate Press	800 kg
Untreated Non-Chrome Effluent	Non-Chrome Collection Pit	100,000 Lt

Untreated Non-Chrome Effluent	Non-Chrome Collection Pit	100,000 Lt
Treated Non-Chrome Effluent	Non-Chrome Clarifier	70,000 Lt
Treated Non-Chrome Effluent	Non-Chrome Sludge Tank	58,000 Lt
Treated Non-Chrome Effluent	Supernatant Tank	9,000 Lt
Treated Non-Chrome Effluent	Irrigation Tank 1	300,000 Lt
Treated Non-Chrome Effluent	Irrigation Tank 2	300,000 Lt
Treated Non-Chrome Effluent	Irrigation Tank 3	300,000 Lt

10.4 Containing Spills On-Site:

- On site there are many Dangerous Goods and Hazardous Substances. Workers will be provided with “Chemical Response” training to ensure they can safely clean up and dispose of any spills that may occur;
- Spills are to be cleaned up immediately using the spill kit; and
- The Wastewater Supervisor and Plant Manager must be notified immediately of any on-site or off-site spills.
- For all Major Wastewater pollutant spills, refer to SOP_WW 3 - Emergency Response to Wastewater Spillage.

10.5 Spill Kits Are Located On-Site in The Following Areas:

- Wastewater Shed;
- Maintenance Shed;
- Chemical Storage Area; and
- Wet Blue Drums.

Spill kits contain instructions, absorbents and protective equipment to clean up any spills.

A low risk or minor spill is one that workers should be capable of handling safely after receiving appropriate training.

10.6 Operators must wear appropriate personal protective equipment when cleaning up any spills including:

- Chemical suit;
- Long sleeve shirts and pants;
- Safety glasses/face shield/goggles;
- Gloves/chemical gloves;
- Chemical splash apron/Chemical resistant overalls and respirator;
- Non-slip footwear/safety boots;

10.7 Treating Non-Mobile Spillages

Once a spillage has been immobilised it must be disposed of as follows:

- (a) **Chemicals** – consult the SDS and the SOP_DR5 - Chemical Response. Follow the instructions and dispose of accordingly.
- (b) **Chrome containing solid waste** – shovel sand and chrome into chrome waste bin used in the samming department for treatment in the waste mixer.
- (c) **Non-chrome solid waste** – shovel sand and solid waste into a side spout bin and rotate into non-chrome sludge tank for injection.
- (d) **Non-chrome irrigation effluent** – if the non-chrome effluent spill can be immobilised with the sand, treat it as per (c) otherwise refer to SOP_WW 3 - Emergency Response to Wastewater Spillage.

10.8 Hydrogen Sulphide Gas (H₂S)⁵

- (a) Hydrogen Sulphide Gas ('H₂S') is a colourless gas with the characteristic foul odour of rotten eggs. It is heavier than air, so it will settle in the bottom of tanks, pits and drums and is very poisonous, corrosive, flammable, explosive and can be fatal.
- (b) Wetblue processing and wastewater activities carried out at GLC have the potential to cause adverse effects on air quality through the emission of substances such as H₂S.
GLC aim to identify, assess and minimise harm to the environment, any adverse effects to human health, or any nuisance situation from air emissions due to their operations as well as comply with relevant air quality guidelines and legislation.
- (c) The drums are equipped with a fume extraction and wet scrubbing system to remove the H₂S as well as other gases. 100 kg of Sodium Percarbonate is stored on the mezzanine level for emergency dosing of drums and hide processors to eliminate hydrogen sulphide gas.
- (d) **Green, Orange and Red Light System**
 - i. Fixed H₂S detectors are fitted above each drum chemical loading platform, inside the control room and next to the hide processors.
 - ii. A beacon system is installed above or near all fixed gas detectors and at the entrance to the control room
 - iii. **Green** means **air is safe** and H₂S levels are below 10 ppm.

⁵ Refer to WHS 29_Emergency Hydrogen Sulphide Gas Procedure for full details on emergency responses required.

- iv. **Orange** means **call Supervisor**, levels have reached H₂S levels between 10 ppm and 15 ppm. **You can only work in area for up to 15 mins** and cannot be repeated more than four times per day. There must be at least 60 minutes between successive exposures.
- v. **Red** means **evacuate the area** that contains a sensor. H₂S levels have exceeded 15 ppm.
- vi. If Levels have exceeded 15 ppm (**Red light**) in areas where people are working, the factory evacuation alarm will sound for the entire site.

10.9 Hydrogen Sulphide Gas Emergency Equipment

- (a) A H₂S Evacuation Kit is located at the side of the chemical weighing shed. It contains emergency breathing apparatus, portable gas detectors, emergency phone numbers, a copy of this SOP and an emergency checklist. Additional Emergency Breathing Apparatus and spare Multi-Gas detectors are also located in the control Room.
- (b) Half face respirators which filter H₂S gas are issued to all drum and waste water workers and are to be worn when opening the chemical doors during deliming, pickling, chrome additions and also when entering confined spaces in waste water or drainage systems, even after testing has found no H₂S present. Half face respirators should also be worn during an evacuation.
- (c) A confined space kit containing a rope rescue kit, harness, confined space permit book, risk assessment, rescue plans, warning signs and lockout kit is located next to the chrome sludge settling tank for confined space use.

11. TRAINING

- 11.1 Workers will be provided with training to ensure they can safely clean-up and dispose of any chemical spills that may occur.
- 11.2 Spill Response training will be provided during the induction and refresher training will be provided annually to ensure Workers continue to observe safe work practices.
- 11.3 All Workers will be provided with training during the induction on how to report any hazardous spills and complete an Incident Report and Investigation Form. Refresher training will be provided annually to ensure Workers are aware of their responsibility to report any emergency hazardous materials and wastewater pollutant spills.
- 11.4 Training records for Workers shall be maintained by the WHS department.
- 11.5 The Department Supervisors or delegate will conduct a training needs analysis on an annual basis to determine training requirements and will be discussed with the Plant Manager.

12. COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

- 12.1 It is important critical information relating to incidents is conveyed immediately to relevant personnel to reduce the risks of further incidents. Ensure face-to-face communication wherever feasible to ensure the recipient of information clearly understands the message.
- 12.2 Correspondence received by GLC relating to environmental issues will be managed by the Plant Manager. Advice may be sought from the Technical Manager or from the General Manager depending upon the complexity of the issue.
- 12.3 In the event of an environmental incident, only the Plant Manager or delegate are authorised to make any statements to the media or public. Workers will be informed to direct all media attention to the Plant Manager.
- 12.4 Minutes of EMS Meetings, results from EMS monitoring Regulations / Legislation, reports/results and audits will be distributed to all GLC Department Managers as appropriate.

13. INFORMATION TO BE TAKEN IN THE EVENT OF A POLLUTION INCIDENT

13.1 The following information (as a minimum) should be included in the initial notification on the **Incident/Injury Report and Investigation Form**:

- a) The nature of the incident;
- b) Time and date of incident;
- c) Location of incident;
- d) Number of persons involved (if any);
- e) Description of injuries (if any);
- f) Details of the train or other rail vehicle;
- g) Number and type of vehicles involved
- h) Name and contact details of the person in charge at the incident site;
- i) Potential hazards;
- j) Dangerous goods.

13.2 AIR EMISSIONS – OFFENSIVE ODOURS

Questions to ask the caller in the event of an odour complaint phone call:

- a) Residents name and contact number;
- b) How long have you noticed the odour – Duration of the odour;
- c) How strong is the odour – Strong, mild or weak;
- d) What does the odour smell like – rotten eggs, urine or something else – description of odour;
- e) Thank you for providing us with the information we will try and rectify the problem immediately; and
- f) Our Wastewater Supervisor or Plant Manager will be in contact with you shortly.

GLC Response:

- a) Go outside and check the wind sock to determine which way the wind is blowing;
- b) All details of investigation are to be recorded under section 2.6 on the EMS Pollution Complaints form;
- c) A response will be given to the complainant by the Plant Manager or Wastewater Supervisor.
This response shall be documented on the EMS Pollution Complaints Form, under Section 2.5.

14. REFERENCES

- a) WHS 9 - Emergency Preparedness Procedure
- b) WHS 29 – Emergency Hydrogen Sulphide Gas Procedure
- c) SOP_WW 3 - Emergency Response to Wastewater Spillage
- d) SOP_DR 5 – Chemical Response
- e) EMS 19 - Emissions to Air and Odour Procedure
- f) EMS 3 – Environmental Aspects
- g) EMS 3.1 - Register of Aspects
- h) EMS 8 – Training, Awareness and Competence
- i) EMS 9 – Communication
- j) NSW EPA Licence 3465

ADDITIONAL REFERENCES FROM SOP WASTEWATER (Used in conjunction with EMS 20 PIRMP)

- k) SOP_WW 1 - General Operations
- l) SOP_WW 2 - Waste Disposal
- m) SOP_WW 3 - Emergency Response to Wastewater Spillage
- n) SOP_WW 4 - Non-chrome Effluent Treatment
- o) SOP_WW 5 - Chrome Effluent Treatment
- p) SOP_WW 6 - Hardhose Irrigation
- q) SOP_WW 7 - Pivot Irrigation

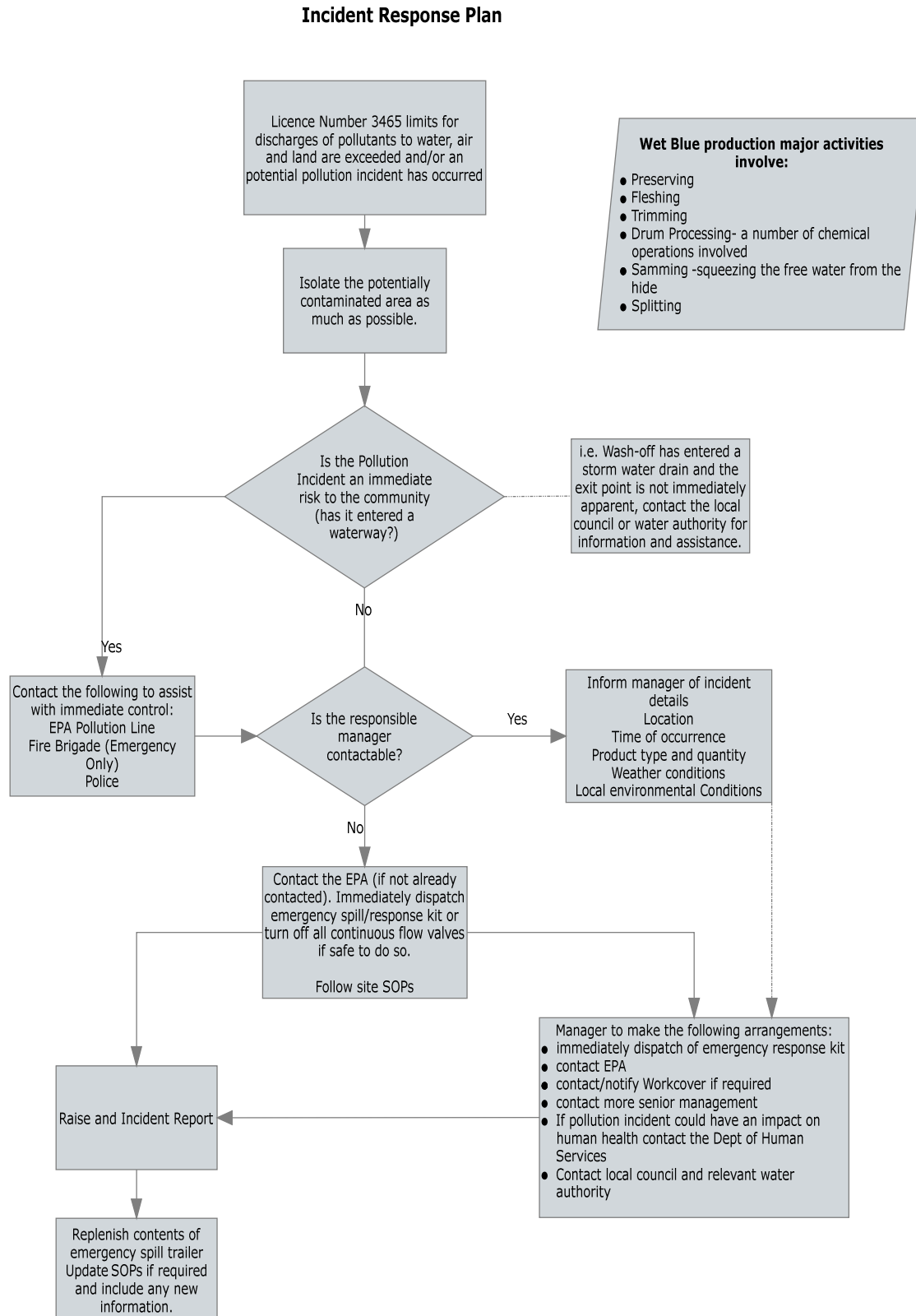
15. REFERENCES/OTHER RELEVANT DOCUMENTS

- (a) WHS Policy
- (b) Environmental Policy
- (c) Legal and Obligation Register
- (d) Incident Injury Reporting & Investigation Form
- (e) EMS Pollution Complaints Forms - Filed

16. DOCUMENT HISTORY

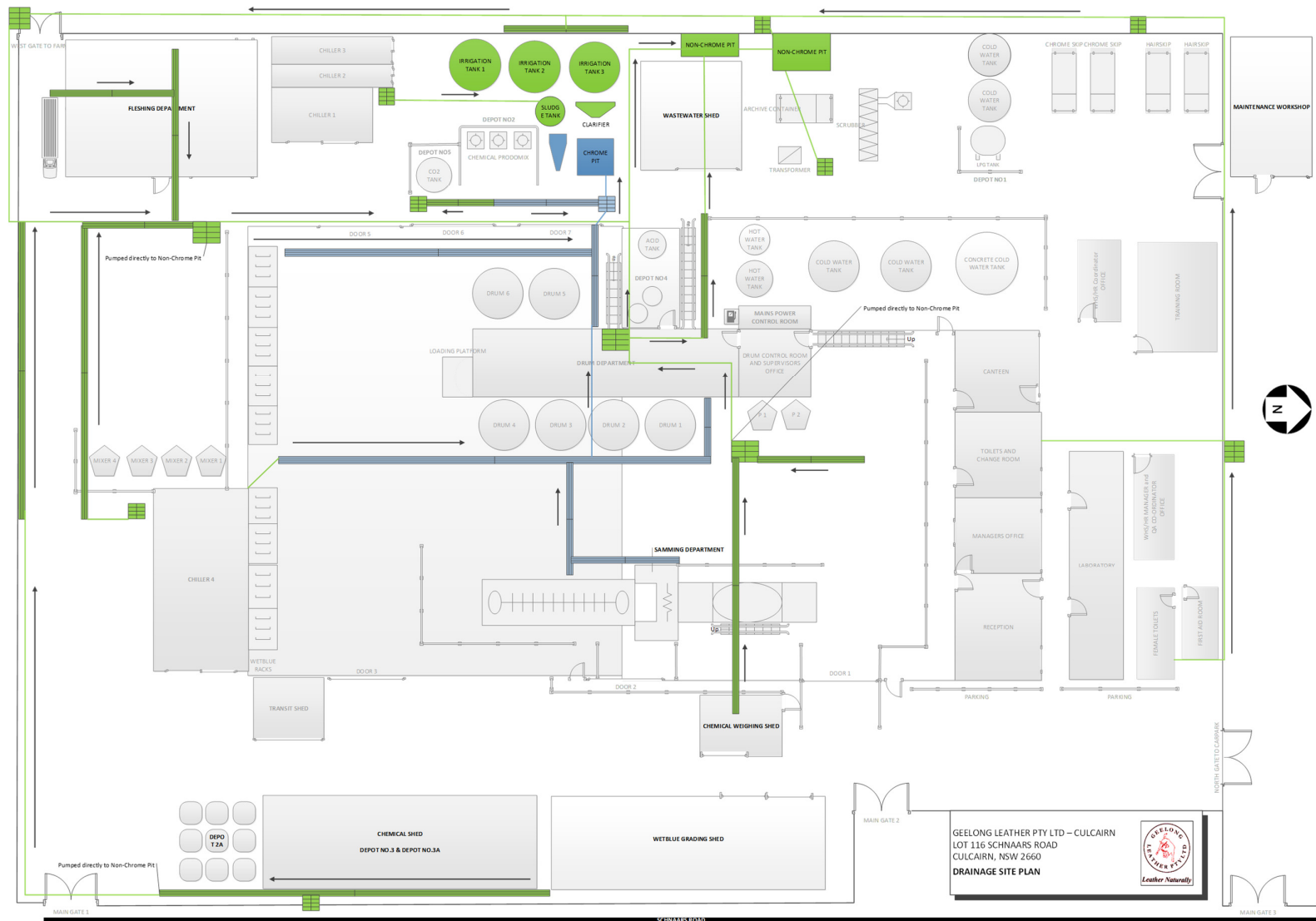
REVISION / VERSION	DATE	SUMMARY OF CHANGES	TRAINING REQUIRED?
Rev 0	06 Jun 2012	Initial	Y
Rev 1	18 Sep 2013	Additional references included	N
Rev 2	20 Aug 2015	Updated for EPA requirements	N
Rev 3	08 Jan 2016	Additional references included	N
Rev 4	13 Jan 2017	Updated supporting documents	N
Rev 5	20 Nov 2017	Reviewed and updated	N
Version 1	30 Sep 2018	Revise formatting, header and footer – Transfer from WHS Procedure to EMS Procedure and review content	N
Version 2	30 Sep 2019	Reviewed and updated with Buchlyvie farm details, site maps and references included.	N
Version 3	6 Dec 2019	Included definition of pollution incident from environmental guidelines. Included additional image for Environmental Receptors displaying site contamination moat around the factory, table listing all wastewater pollutants held in tanks/pits and emergency response for a Hydrogen Sulphide Gas leak.	N

FIGURE 1: OVERVIEW OF INCIDENT RESPONSE PLAN





EMS 20 – POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



VERSION 2
03/09/2019

FIGURE 3: DRAINAGE SITE PLAN

EMS 20 – POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

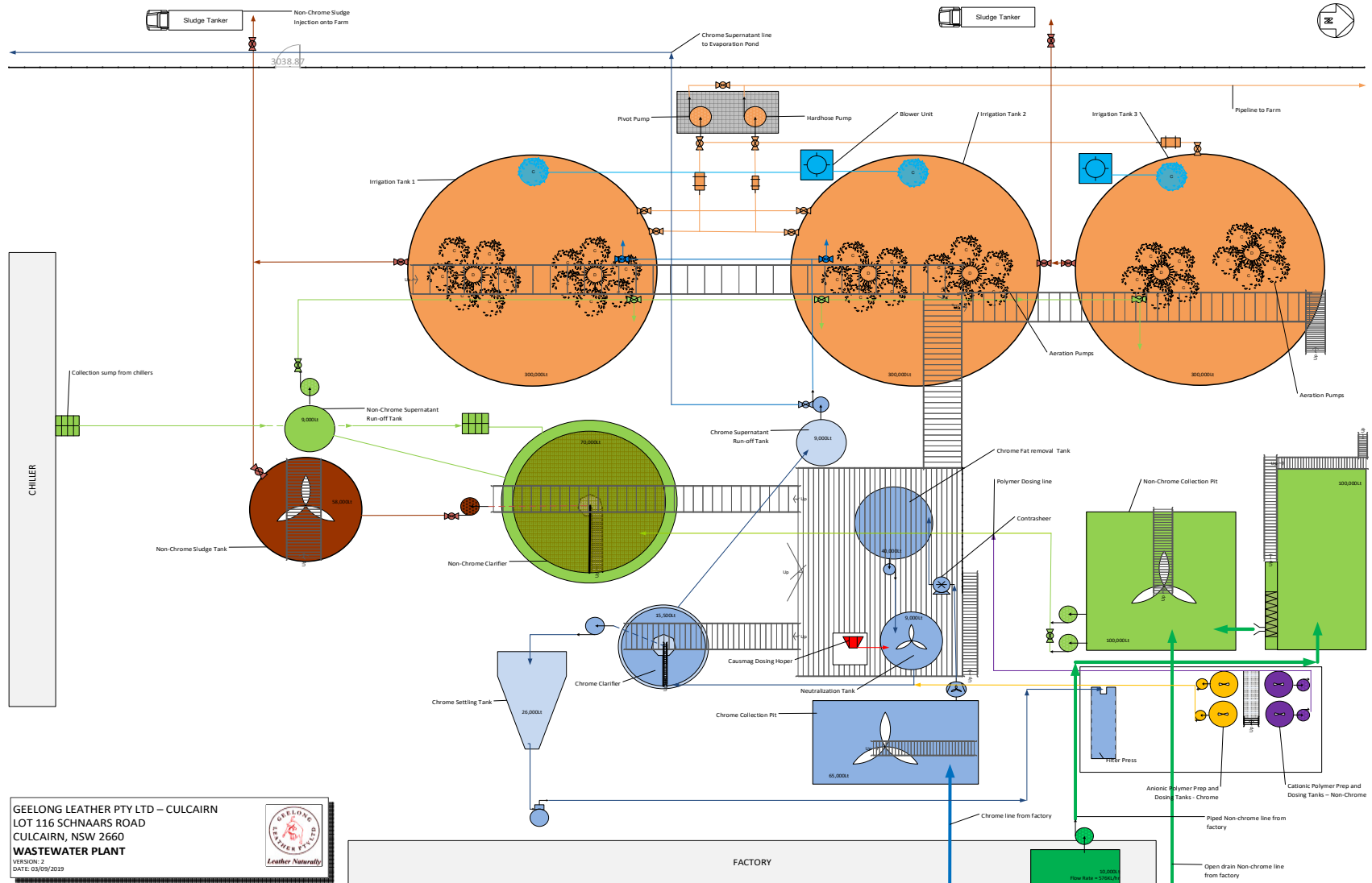


FIGURE 4: WASTEWATER PLANT

EMS 20 – POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

