Jamestrong Packaging

Pollution Incident Response Management Plan

Hazards on Site

Refer to WorkCover Dangerous Goods manifest of onsite dangerous goods and also Hazchem Layout of plant that detail where they are stored.

The likelihood of an emergency with regard to the dangerous goods has been mitigated by the maintain of a cleared area of bush around the perimeter of the plant boundary and also a automatic deluge system in place for the LPG tank. The deluge system is tested regularly. In addition, the plant has a no smoking requirement other than in a designated area which is remote to the potential fire or explosion hazards.

There are no sensitive areas within 200 metres of the plant boundary. The nearest sensitive receptor is a school at approx. 250 metres distance.

Waste Water Storage

Waste water is stored on site in polymer above ground tanks to a capacity of 40000 litres, an above ground concrete tank to a capacity of 10000 litres and a ground level tanks to a capacity of 10000L.

The tanks in waste water are all bunded if there is a failure of the tank integrity and the waste water system is alarmed if the tanks reach a maximum level.

Waste Dangerous Goods Storage

Waste dangerous goods are stored in a bunded area that has a capacity 1.33 times the largest storage container.

Bunding for Dangerous Goods

All other dangerous goods storage areas are bunded with a capacity of 1.33 times the largest container.

Uncontrolled Release of Gas

There is an emergency shutdown procedure "Gas Leak Detection & Isolation" that describes the process for the isolating gas leaks.

Pre-emptive actions to be taken

Spill Kits

There are 4 spill kits placed near the identified spill danger areas. These spill kit locations are also shown on the Stormwater & Spill Kit Plan.

Bund Integrity

The bunds are locked in a closed position and inspected 3 times per week.

Stormwater Isolation

There are 2 stormwater isolation valves that are detailed on the Stormwater & Spill Kit Plan.

Inventory of pollutants

Manifest of dangerous goods is maintained and reviewed yearly or when changes are made. Other chemicals stored onsite in significant volume include stamping & lubricating oils.

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Safety Equipment

Site personnel are trained in the use of PPE required to protect them from the dangerous chemicals they use and would have to deal with in the event of a spill. In addition, all spill response kits include the PPE required to ensure protection from the chemicals whilst they are containing or cleaning the spill.

Contact Details

Escalation Management procedure, a copy of which is always available to the Chief Fire Warden, details the persons to contact in the event of an environmental incident who are responsible for managing the response and also authorised to notify the authorities

The Escalation Management procedure also details the contact details for the required regulatory authorities.

Communicating with neighbours and the local community

In the event of a major environmental incident, the neighbours adjudged to be effected by the incident will be contacted directly by personal as directed by the Operations Manager

Minimising harm to persons on the premises

In the event of a major environmental incident that is considered to be a danger to the employees, the evacuation plan will be enacted. This plan includes clearly identified an assembly location, evacuation siren, and clearly marked egress points from the building.

Maps

Refer attachment for the detailed map of the plant and potential affected areas.

Actions to be taken during or immediately after a pollution incident

With regard to actions taken during the incident, refer to spills management procedure, Escalation Management procedure & "Gas Leak Detection & Isolation" SOP.

Once the incident has been controlled, an incident report will be conducted to determine root cause and corrective & preventative actions.

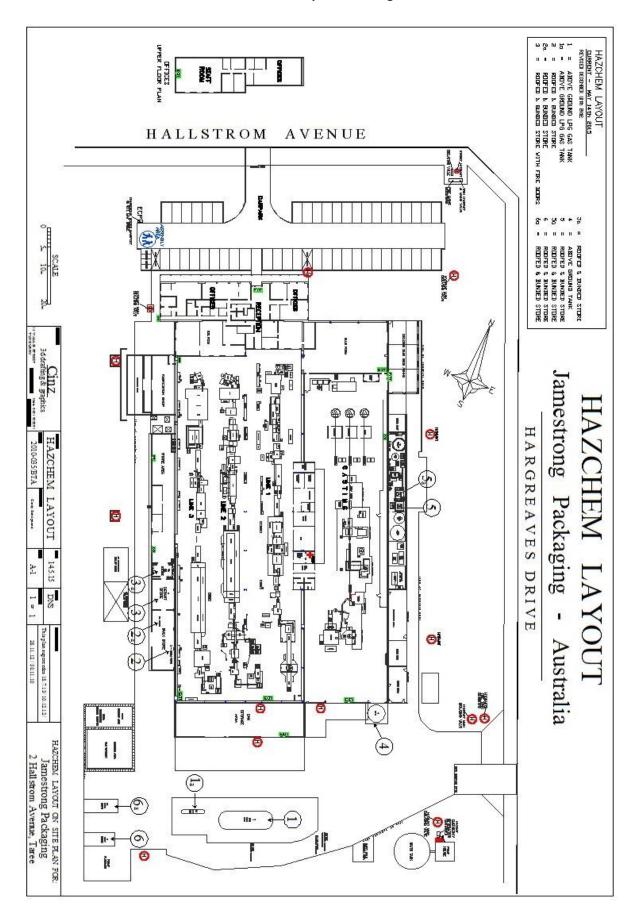
Staff Training

There is a training plan for all employees on the site that includes evacuation, spills management, and other procedures related to emergency response.

Testing of Plan

The plan will be tested annually as part of the internal audit process. The testing will include a desktop audit of the information in the plan, testing knowledge of staff as to their ability to respond to an environmental emergency and also testing of the operation of the isolation valves for the stormwater system. In addition, internal audits are carried out weekly on the effectiveness of the bunding, status of the spill kits and any potential issues that could lead to an environmental spill.

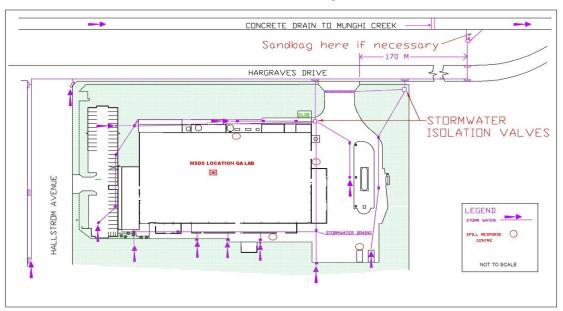
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Stormwater & Spill Kit

