

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

for

11-15 Moores Rd Glenorie

Owned by Glenorie Holdings Pty Ltd

Tenants: BIOPROPERTIES Pty Ltd

CEVA Pty Ltd

Revised by David Beech

Bioproperties Engineering & Services Manager

May 2020

# Pollution Incident Response Management Plan 2020

Pollution Incident Response Plan for Glenorie Holdings at 11-15 Moores Rd Glenorie

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## 1. OVERVIEW

This Pollution Incident Response Management Plan (**PIRMP**) has been written to comply with the legislative requirements under the Protection of the Environment operation Act 1997 (POEO Act) and the Protection of the Environment Operations General Regulation 2009.

Under the legislation referred to above, the Environmental Protection Licence (**EPL**) also requires a PIRMP to clearly document pollutions risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollute 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.

The PIRMP contains the following sections as required by the regulation:

1. **Background** – describes main features of the regulation.
2. **Hazard, likelihood and pre-emptive actions to prevent pollution incident risks** – describes type of pollution incidents that may be possible and lists procedures that are already in place to minimize and manage pollution. Ranking the risk is included in appendices.
3. **Maps** – map of project to show location of potentially affected neighbours and environmentally sensitive areas
4. **Emergency incident response procedures** – what to do in case of material harm
5. **Early warnings and communication to neighbours** – when to contact neighbours in case of pollution incidents and info required for website
6. **Training** – information to be passed on to staff and contractors
7. **Updating of plan** – frequency of updates
8. **Testing** – frequency of drills to test effectiveness of PIRMP
9. **Implementing of plan** – reference to legislation requirement to carry out aspects of the plan during a pollution incident

### Introduction

**Glenorie Holdings** (ACN 143 702 854) is the owner of the site 11-15 Moores Rd, Glenorie 2157 and has two tenants on the site producing pharmaceuticals (CEVA and BIOPROPERTIES PTY LTD) under licence to the APVMA with regular inspections by both the APVMA and the TGA. In addition BIOPROPERTIES holds an Office of the Gene Technology Regulator (OGTR) Licence to produce Genetically Modified Organisms (GMO's) in Physical Containment Level 2 facilities (PC2) and also houses poultry under its own Animal Ethics Committee and is inspected by NSW DPI.

This site is covered by an **Environment Protection Licence (EPL) number 20284** for the scheduled activities of Pharmaceutical & Veterinary Product Production and the Licence is held by Glenorie Holdings Pty Ltd.

The site is developing an overarching environmental management system, however currently Glenorie Holdings through Bioproperties, has a series of Site Facility documents and procedures that deal with the site as whole and these include such controls as **SOP-0329 V2 Liquid Site Effluent Management Procedure, HSP-0002 V5 Emergency Evacuation Procedure, HSP-0015 V2 Handling Chemical and Biological Spills Procedure** and (see Appendices) which all have sections on Emergency Response Procedure and the Emergency Response Procedure Decision Tree covering both hazardous and nonhazardous situations. This document and others are used by both tenants operationally.

In addition, each tenant has its own set of Good Manufacturing Practices (**cGMP**) documents outlining procedures reducing risk to the manufacturing environs of both facilities as well as the environmental surrounds within and outside the property. The GMP requirements, which are audited by the controlling government body, the Australian Pesticides and Veterinary Pharmaceutical Authority



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(APVMA), require strict containment and cross contamination controls of both the ingredients and the products themselves and this is a far more stringent system of pollution control measures than is normally found in general manufacturing facilities.

Under GMP, training is clearly documented and monitored and records are detailed, signed and reviewed by the independent Quality Assurance department for each company.

## Purpose

The purpose of this PIRMP is to improve not only the way pollution incidents are reported, managed and communicated to the general community but to heighten the importance to our staff and contractors of such potential pollution incidents. In this way, the potential of pollution incidents should greatly reduce.

The purpose of this plan is to:

1. Ensure comprehensive and timely communication about a pollution incident to staff at the premises and any contractors on site, the Environmental Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, Work Cover NSW and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.
2. Minimize and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimize and manage those risks.
3. Ensure that the plan is properly implemented by trained staff, identifying persons responsible for the implementation and ensuring that the plan is regularly tested for accuracy, currency and suitability.

## Scope

This PIRMP is for the use of all Glenorie Holdings, CEVA and Bioproperties staff involved in the manufacture of Pharmaceutical & Veterinary Product and Glenorie Holdings, CEVA and Bioproperties contractors undertaking work on the site.

**The PIRMP will be implemented if material harm to human health or the environment occurs or threatens to occur either within facilities, or the site itself or the external environs to the site.**

Glenorie Holdings Pty Ltd is located at 11-15 Moores Rd, Glenorie 2157 and holds EPL number 20284. Environmental Management at the site is subject to improvements in processes and practices from time to time. To accommodate these ongoing changes and also to accommodate increases in site specific environmental assessment and management, the plan will be progressively reviewed either prior to a major change on the site (facility or operation) or every 3 years.

This PIRMP is to clearly define the requirements of Glenorie Holdings, CEVA and Bioproperties staff to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the POEO Act 1997 and the POEO (general) Regulation 2010. The guidelines for preparing the PIRMP were updated again 2019.

## Responsibilities

All Glenorie Holdings, CEVA and Bioproperties staff and contractors are responsible for understanding and implementing this PIRMP as appropriately identified. The PIRMP identifies the general roles and the responsibilities of Glenorie Holdings, CEVA and Bioproperties staff. Permanent contractors on site shall also manage pollution incidents in accordance with this PIRMP.

Supervisors and Managers are responsible for ensuring that their staff is aware of the PIRMP and their roles where appropriate. They are also responsible for the training of their staff.



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The Bioproperties Operations Manager will:

- call on the assistance of its **Human Resources Support Manager** and its Engineering Services Manager from time to time to assist in the above responsibilities however the Bioproperties Operations Manager is the primary person responsible for the coordination and activation of this PIRMP for the site.
- be responsible to inform and coordinate with the CEVA Operations Manager the EPA requirements of this PIRMP and to keep the GLENORIE HOLDINGS Directors informed of all significant aspects of the PIRMP and any activations of the plan.
- assist with the PIRMP implementation with neighbours and the local community and inform when relevant environmental incidents occur.

The Operations Manager for each tenant is responsible within their own operation for:

- Assisting with advice, reporting and response process;
- Ensuring the Plan is made available to staff responsible for implementing the plan and authorized officers under the POEO Act;
- Giving advice on whether environmental incidents need to be reported to external agencies;
- Informing each other of any pollution occurrences
- Assisting in the notification of pollution incidents to the relevant authorities or the Glenorie Operations Manager for a CEVA incident;
- Provision of maps and diagrams associated with the plan;
- Ensuring that training responsible for activating about their roles in the Plan;
- Testing the PIRMP and
- Reviewing the PIRMP itself

## Documentation

The environmental incident register (BIOPROPERTIES H drive:/Environmental – EPA/Complaints Register) is used to record and monitor all environmental incidents within Glenorie Holdings site. The register will assist with recording keeping, reporting and determining improvements to incident response and review of the Plan. The register is controlled by the Production Administrator. The Operations Manager is responsible for monitoring and measuring the effectiveness of incident management recording. In the same way, the internal Pollution Incident Report form (attached in Appendix 1) is to be used to record all pollution incidents, including those that have not required notification to authorities.

Additional Information:

Contact: Greg Lea mobile # 0407 551 865, office # 02 9658 3300  
Effective date: 4<sup>th</sup> June, 2020  
Review date: June 30<sup>th</sup> 2022

## 2. EVALUATION

This Pollution Incident Response Management Plan (the Plan) attempts to comply with the requirements under the:

- [POEO Act 1997 Part 5.7A Duty to Prepare and implement Pollution Incident Response Management Plans](#)
- [POEO \(General\) Regulation 2009 Part 3A](#)

The requirements under the legislation are supported by the [Environmental Guidelines: Preparation of pollution incident response management plans](#) which provides additional advice from the EPA on Plan preparation.



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Plan preparation is a requirement for holders of Environment Protection Licences (EPLs). Glenorie Holdings operations under **EPL licence no 20284** and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

Key areas which this Plan covers are described in Table 1 PIRMP requirements:

<b>TABLE 1 PIRMP Legislation covered under this PLAN</b>		Reference
<b>POEO Act Part 5.7</b>		
153A	Duty of licence holder to prepare pollution incident response management plan	Whole document plus references
153C	Information to be included in plan including procedures on actions to take after an incident and coordinating with authorities	Section 5
153D	Keeping of plan:	Section 6.3
153E	Testing of plan:	Section 9
153F	Implementation of plan:	Section 10
<b>POEO (General) Regulation 2009</b>		
98C(a)	Hazard assessment:	Section 3
98C(b)	Likelihood assessment:	Section 3
98C(c)	Pre-Emptive Action:	Section 3.3
98C(d)	Pollutant Inventory Types:	Table 2 and Section 3.2
98C(e)	Pollutant Inventory Quantities:	Appendix 2
98C(f)	Safety Equipment:	Section 3.2.1
98C(g)	Staff Contacts:	Section 5.1.1
98C(h)	Authority Contact:	Section 5.4.1 and Section 6.2
98C(i)	Early Warnings Neighbours:	Section 6
98C(j)	Staff Safety:	Appendix 3
98C(k)	Maps location of pollutants:	Section 4
98C(l)	Early Warnings General:	Section 6
98C(m)	Training of Staff:	Section 7
98C(n)	Timing of Testing:	Section 9
98C(o)	Updating of Plan:	Section 8
98C(p)	Plan Testing:	Section 9
98D(1)	Availability of plan:	Section 6.3
98D(2)	Publishing Plan Parts:	Section 6.2
98D(3)	Procedures under Act:	Section 5.1.2
98D(4)	Privacy Protection:	Section 6.4
98E(1)	Testing of the Plan:	Section 9
98E(2)	Minimum Testing requirements:	Section 9

## 3. HAZARD, LIKELIHOOD AND PRE-EMPTIVE ACTIONS TO PREVENT POLLUTION INCIDENT RISKS

### Summary of Pollution Types

The manufacture of Pharmaceutical and Veterinary products by its 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 the Glenorie Holdings site.



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**Table 2: List of Typical Main Pollutants in the Manufacture of Pharmaceutical & Veterinary Products**

Description	Comments on Likelihood and Consequence and Pre-emptive Mitigation
<b>Air Based Emissions</b>	
Dust	Natural dust is generally not associated with this site as roads are sealed except for the bush firefighting track. Filters are in place for the powder mixing area in CEVA and HEPA filters are in place on all laboratories. Annual certification ensures filters are effective and certified as such.
Fire - smoke	Fire is not considered an environmental incident, but the smoke from the fire can be and can affect neighbours. Fire Management is covered under <b>HSP-0002 Emergency Evacuation Procedure</b> and the only planned fires are the Council approved winter bush fuel reduction burn offs. Strategically placed firefighting tanks help ensure the ability of the RFS to fight a wild summer bush fire. Additional facilities have been installed on site to protect buildings from fire and can be accessed via either the RFS or the NSW Fire & Rescue (refer <b>HSP-0042 V1 Fire Response Procedure</b> ).
Noise	Emitted by plant and equipment. Covered under the Noise Risk Assessment RA 15/002 (v2) for the site. Excess Noise past the property boundary fence is only likely to occur from the air compressors, walk-in freezers, boilers or the powders mixing plant if the equipment is not running correctly. Alternatives exist if this occurs. Preventative maintenance also reduces the risk of noise from mechanical problems.
Odour	Odour is generally not associated with this site and certainly not affecting past the boundary of the 25 acre site. Odour incidents are not considered to be material environmental harm, but are included in the PIRMP for consistency with site EMS and to ensure the comfort of employees. The liquid waste management system most likely source of an on-site odour issue and rarely occurs. Localised odours from laboratory fogging and fumigation can cause odours and is covered under hazardous procedures and only operate after normal work hours.
Gas	Several sources exist on site; bottled LPG, natural gas and miscellaneous compressed gases. The natural gas line is covered under a risk assessment as it is the greatest environmental and health risk.
<b>Spill type emissions</b>	
Hazardous chemicals	The site's hazardous chemical list and quantities are attached. Many cGMP documents cover procedures to both prevent and control chemical spills. Bunded laboratories, bunded pallet storage, emergency shut off valves on site effluent tanks, strategically located spill kits, and laboratories without drains are all preventative mitigation steps.
Biological waste	Environmental risk is covered in RA 14/014 which has been reviewed is attached and spill kits and procedures are in place for general biological laboratory waste.
Diesel fuel	The only diesel kept on site is for fuel for back-up generator power and quantities are as minimal as possible and are in bunded areas or bunded tanks. Spill kits are available and training is provided in how to use them.
GMO's	From time to time Genetically Modified Organisms are grown on site and spillages can relate to within a laboratory which are bunded and have disinfectants and accidental discharge without following disinfection & sterilization procedure into the onsite liquid waste system. The waste system has a series of shut off valves to isolate GMO pollution incident and restricted laboratories are designated for their use as Physical Containment Level 2 laboratories. Procedures are in place to advise staff on what to do and training is provided whenever changes are made.
AQIS controlled raw materials	Stringent disinfection and sterilization procedures are in place and are also covered by regular DAWR inspections.



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## 3.1. OVERVIEW

A pollution incident is important to avoid for a number of reasons including staff health, contractor health, visitor health, neighbour health and the environment both at the work site, the immediate surrounding area and the wider catchment area.

The site at 11-15 Moores Road is licenced for Pharmaceutical research, manufacture, storage and distribution and is here with State Planning approval and is bordered on three sides by Rural Residential & Agricultural properties. To the east the property borders on a Zone E3 Environmental Management Zone that has natural bush national park and catchment to Marra Marra Creek and ultimately the Hawkesbury River.

This section deals with the POEO (General) Regulation 2009's sections 98(a) to 98(f) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimize these risks. Glenorie Holdings Pty Ltd site undertakes Pharmaceutical & Veterinary Product Production.

This Plan also considers both air and water based pollution incident impacts. Overall considerable design and written environmental management systems are in place to effectively minimize the likelihood and impact of a pollution incident. Please refer to Table 3 listing all relevant GMP documents. 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 incident response methods.

This Plan uses a risk category approach to this risk assessment process. Each category represents an operation undertaken in the manufacture of Pharmaceutical & Veterinary Product such as:

1. Use and storage of hazardous chemicals - CEVA and BIOPROPERTIES
2. Use and storage of non-hazardous chemicals - CEVA and BIOPROPERTIES
3. Manufacture and handling of GMO's - BIOPROPERTIES ONLY
4. On site Liquid waste disposal – GLENORIE HOLDINGS
5. Use, storage and disposal of Biological waste – CEVA and BIOPROPERTIES
6. Noise – related document Risk Assessment RMR 15/002 v2 '*Environmental Pollution from Noise*'
7. Dust – related document HSP-0030 (1) '*Air Pollution Incident Procedure*'
8. Effluent Treatment System – Risk assessment RMR 15/003 v2.

These categories apply to both companies on the site as a whole and they are all based at 11-15 Moores Rd, Glenorie 2157.

The risk assessment and control measures process includes impact on neighbours and crosses over with safety risk assessment processes and is covered under Bioproperties Work Health & Safety Committee, the CEVA WHS Committee and the Site Operations meetings between each tenant and Glenorie Holdings.

Where applicable, an inventory of pollutants or expected maximum quantities of pollutants likely to be stored. The pollutant types include hazardous chemicals as defined under the Workplace Health and Safety legislation and non-hazardous chemicals such as aqueous based liquids.



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## 3.2. Summary of Pollution Types

### 3.2.1. Use and Storage of Chemicals Safety Issues

Hazardous Chemicals have been identified and listed in Appendix 2. These are listed by Class and by tenant and includes placarding quantities, stock levels at the time and likely maximum stock levels. Appropriate signage is in place at storage areas. Hazardous goods receipt, storage, use and waste removal are strictly controlled. Storage locations are also attached in Appendix 2 Safety Data Sheets are kept at strategic locations for all chemicals.

Appropriate Personal Safety equipment is provided. Where necessary, this includes the use of Respirators with appropriate canisters for the chemical.

The manufacture of Pharmaceutical and Veterinary products by its very nature has only a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types found for the Glenorie Holdings site. Appropriate SOP's such as SOP-0281 Handling and Disposal of Hazardous and Biological Waste.

## 3.3. Risk assessment and control measures (pre-emptive actions)

### 3.3.1. Identification of Risk Areas

A list of Hazardous procedures (HSP's) highlight particularly high risk procedures either from a personnel safety point a view or from an environmental point of view.

Other forms of documentation that relate to protecting staff and the environment are listed in the table below;

Table 3 - Documents relating to protecting the Environment

BPL Documents	<ul style="list-style-type: none"><li>• Drain Waste Disposal Record form</li><li>• HSP-002 Emergency Evacuation Procedure</li><li>• HSP-0004 Hazardous Procedure for Proxitane Use</li><li>• HSP-0005 Using the Bulk Chemical and Hazardous Biological Waste Spillage Kit</li><li>• HSP-0012 Hazardous Procedure Dry Ice</li><li>• HSP-0015 Handling Chemical and Biological Spills</li><li>• HSP-0025 Hazardous Clinical and Biological Waste</li><li>• OI-0236 Disposing of Extran and Virkon Waste After Cleaning</li><li>• PRS-0005 Paraformaldehyde Fumigation</li><li>• PRS-0121 Proxitane Fogging</li><li>• Service Agreement with Daniels Health Services Pty Ltd</li><li>• SMF-0001 Annex 1.4 Parts 1 and 2 Glenorie Site Plan Schematic</li><li>• SMF-0009 Annex 3.7.1 Glenorie Site Plan Schematic Storage Areas</li><li>• SMF-0009 Annex 3.7.2- various Glenorie Site Plan Schematic Storage Areas for DAWR materials and movements</li><li>• SMF-0009 Site Facilities Part 7 Storage Facilities, Administration Areas and Handling of DAWR Materials</li><li>• SMF-0011 WTM Site Master File Water Treatment Manual</li><li>• SOP-0003 Site Biosecurity</li><li>• SOP-0080 Proxitane Fogging of BIOPROPERTIES Production Facilities</li><li>• SOP-0096 Staff Training</li><li>• SOP-0118 Paraformaldehyde Prills Fumigation of Bioproperties Laboratories</li><li>• SOP-0180 Notifying OGTR of Unintentional Release of a GMO</li><li>• SOP-0195 Procedures for a Biological Spillage in a PC2 Laboratory</li></ul>
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	<ul style="list-style-type: none"> <li>• SOP-0245 Pest Control</li> <li>• SOP-0247 Handling of AQIS Goods and their Derivatives</li> <li>• SOP-0262 Handling of Trypsin 1 250 and Tryptose Phosphate Broth Acquired under AQIS Permits</li> <li>• SOP-0281 Handling and Disposal of Hazardous Biological Waste</li> <li>• SOP-0310 Handling of Paraformaldehyde</li> <li>• SOP-0329 Liquid Effluent Site Management Procedure             <ul style="list-style-type: none"> <li>○ Appendix Plan of Liquid Effluent Treatment Points.</li> <li>○ Appendix Plan of Liquid Effluent Waste Collection and Emergency Shut –Off ST7 and ST8</li> <li>○ Appendix Plan of Liquid Effluent Waste Collection Shut-Off PPL and ST6</li> </ul> </li> <li>• SOP-0356 Management of Facility Maintenance</li> </ul>
CEVA documents	<ul style="list-style-type: none"> <li>• SOPENG001 Emergency Spill Response Procedure for Liquid Waste Systems</li> <li>• WHSIMSM 001 – Workplace health, safety and injury management systems</li> <li>• Manual Ceva Emergency Plans and Procedures</li> <li>• Emergency Contact List</li> <li>• Incident Report Form</li> <li>• Ceva Glenorie – Site Policy V1.3</li> <li>• Ceva Site Security Program</li> </ul>

### 3.4. Risk Assessments

The relevant risk assessments for potential pollutants are attached in Appendix 4. These include RA 14/014 - Environmental Contamination from Biological Waste (reviewed), RA 15/002 - Environmental pollution from noise (revised), RA 15/003 – Pollution risks through the onsite liquid waste treatment system for example (revised).

These Risk Assessments have all been reviewed and where appropriate revised to cover current operations.

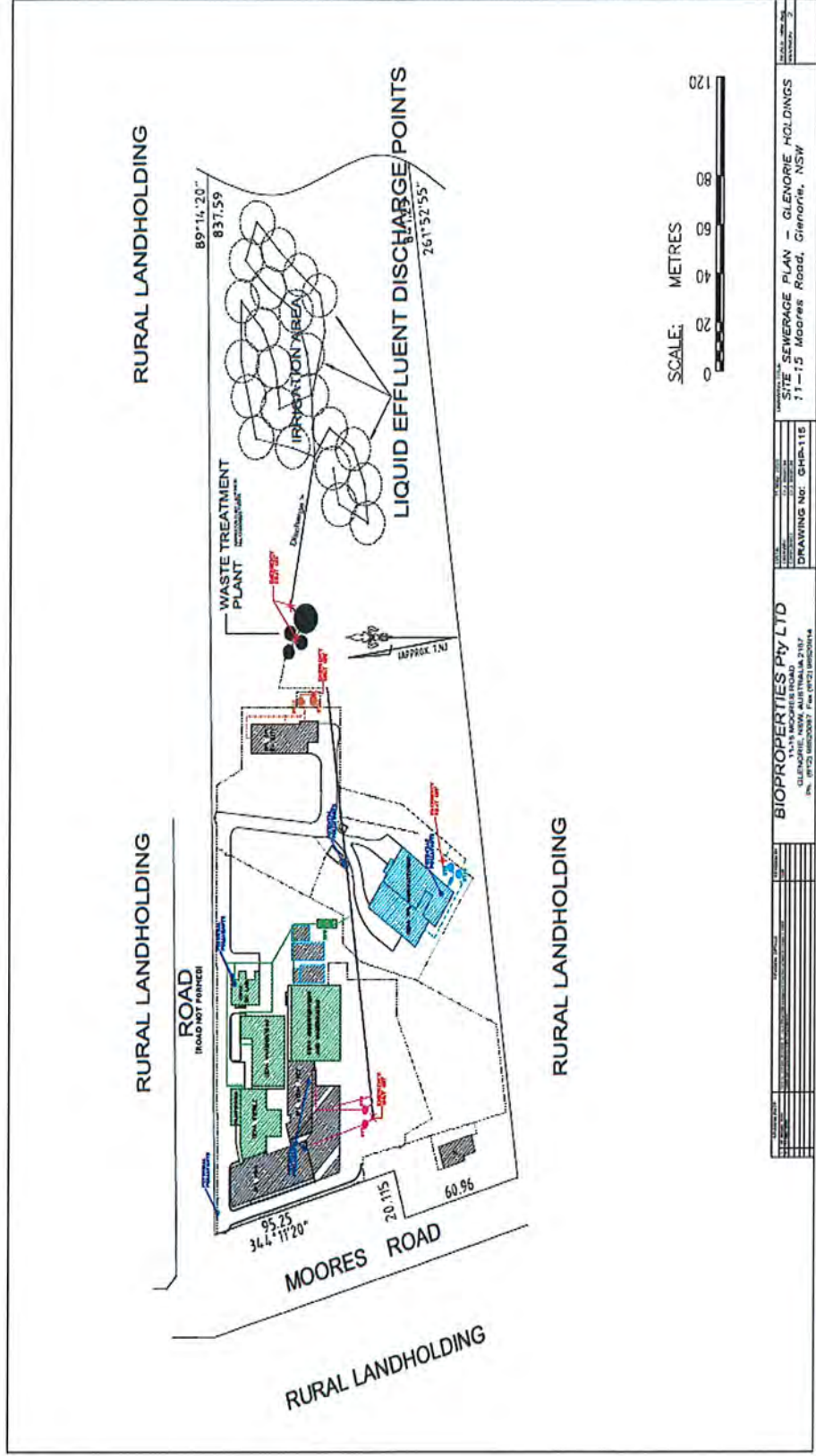


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## 4. MAPS

### 4.1. EPA site map for Glenorie Holdings Pty Ltd

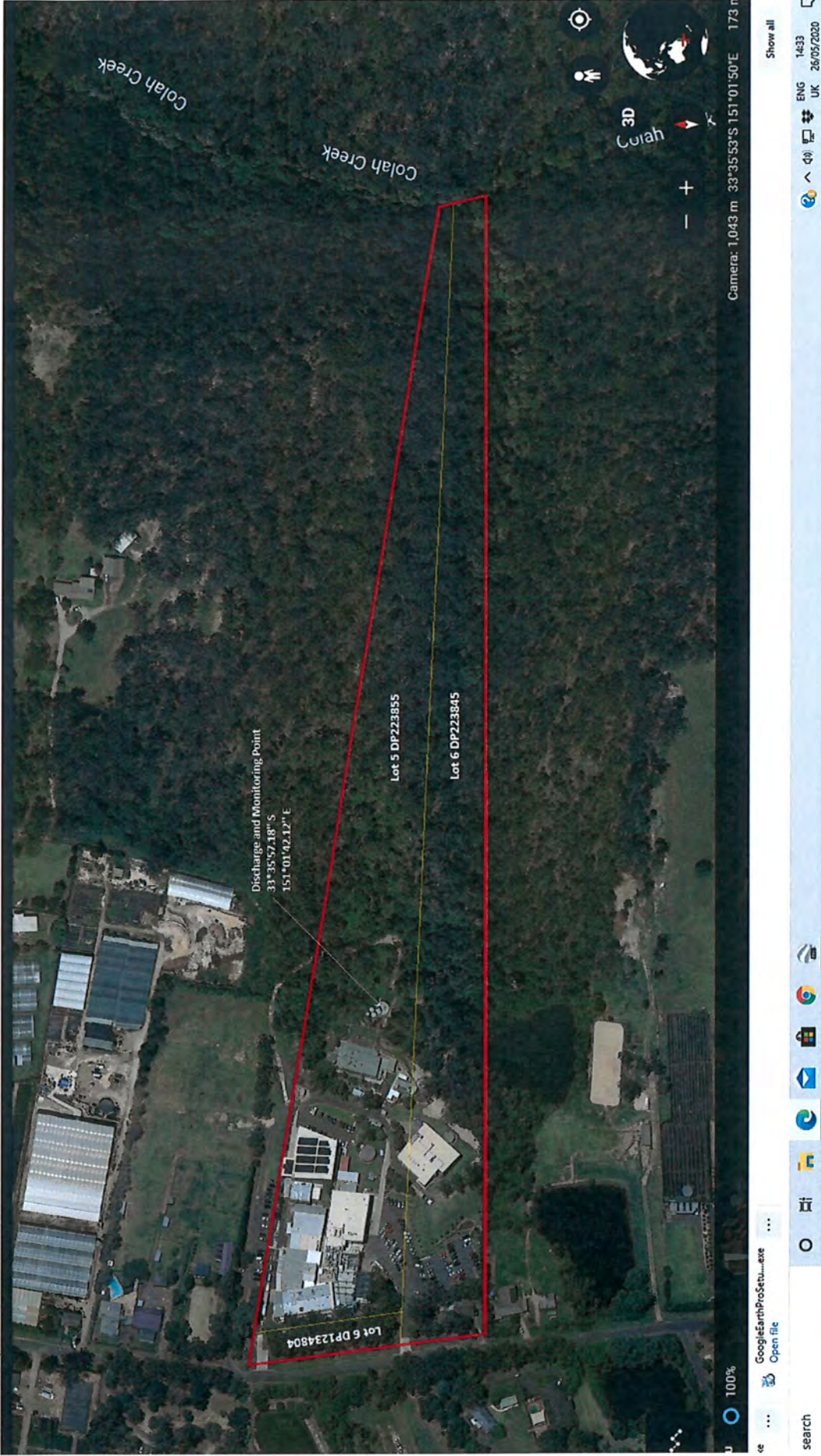




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EPA site map – Aerial View





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## 4.2. Maps – Location of Potentially affected neighbours

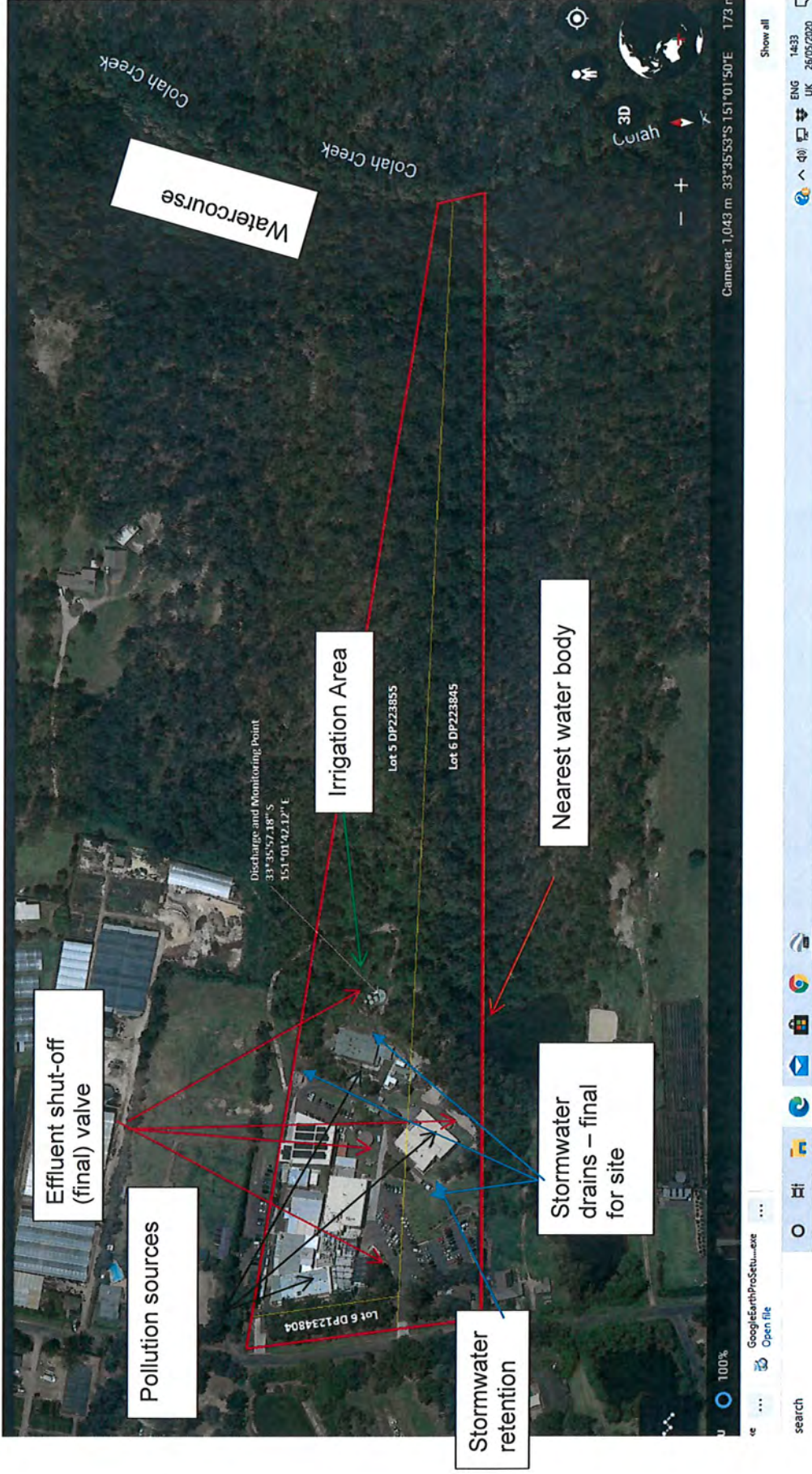




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## 4.3. Maps – Location of Stormwater drains and affected areas





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## 5. EMERGENCY INCIDENT RESPONSE PROCEDURES

The following flow chart summarises the process to be taken in the event of a pollution incident:

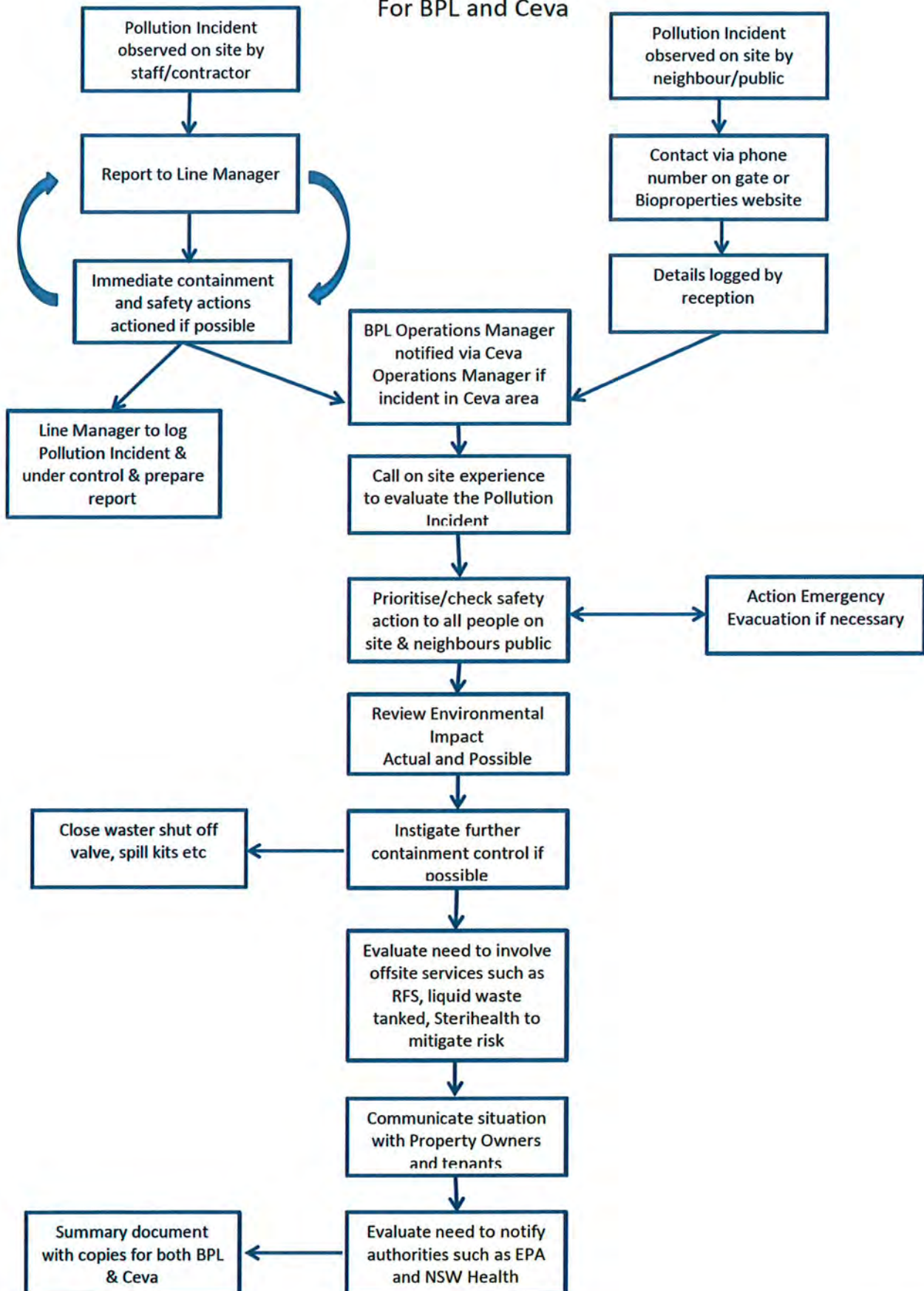


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## Pollution Incident Decision Process

For BPL and Ceva





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## 5.1. Internal communications – key names and contacts

### 5.1.1. Action to be taken immediately after a Pollution Incident by Licence Holder and Occupier of the Premises

The first actions to be taken are ensuring the safety of people on and offsite, the environment on and offsite and to mitigate the risk of the incident (eg contain a spillage).

The communications procedure then involves contacting the BPL Operations Manager as the Chief co coordinator for all offsite contact whether to Government Agencies or neighbours.

The Bioproperties general office number is 96583300, the Operations Manager's direct line is 96583303.

The Licence Holder will also be informed by the Bioproperties Operations Manager of the action plan and they will double check that their responsibilities are fully incorporated in the actions.

### 5.1.2. Procedures to be followed for coordinating with the Authorities or Persons

All communications with Government agencies is to be through the Bioproperties Operations Manager and his back up is the Validation and Special Projects Manager and then the engineering and Services Manager.

Emergency contact is to be by phone but then followed by email as per the details below. Glenorie Holdings Directors and the CEVA CEO and /or Operations Manager are also to be notified if any Government Agency is notified and will be involved in the decision making process.

#### **Environment Protection Agency NSW.**

Phone: 131 555

Email: [info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au) (please state what you are enquiring about in the subject line)

#### **NSW Health**

Phone: 9391 9000 - ask for Environmental Health Officer on call

Email: <http://www.health.nsw.gov.au/pages/feedback.aspx>

#### **Fire & Rescue NSW**

Phone: 92652999

Email: [info@fire.nsw.gov.au](mailto:info@fire.nsw.gov.au)

#### **WorkCover** Phone: 131050

Email: [contact@workcover.nsw.gov.au](mailto:contact@workcover.nsw.gov.au)

#### **Hornsby Shire Council**

Phone: 98476666

Email: [hsc@hornsby.nsw.gov.au](mailto:hsc@hornsby.nsw.gov.au)

#### **OGTR**

Free call: 1800 181 030 Email:

[ogtr@health.gov.au](mailto:ogtr@health.gov.au)



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## 5.2. Procedure to be followed for combating the pollution caused by a spill incident.

Procedures relate to within laboratories and outside buildings. For Bioproperties and CEVA, refer HSP 0005 Using the Bulk Chemical and hazardous Biological Waste Spillage Kit attached and for spills accessing the onsite Liquid Waste Treatment System refer to Bioproperties SOP 0329 for both tenants and SOP ENG 001 for CEVA specifically.

## 5.3. Procedure to be followed following an air incident

Laboratories on site generally have HEPA filters on their room exhausts and by filtering exhaust air to 0.2 of a micron, air incidents have been and will be very rare. The Oocyst production unit has course filters to 10 microns on their exhaust and the Powders and Paste building also has exhaust air filtered for its mixing area. Refer HSP 0030 attached.

## 5.4. External communications – government agencies and other parties

### 5.4.1. Co-ordinating with the authorities

All communications with Government agencies is to be through the Bioproperties Operations Manager and his back up is the **Assistant Operations Manager**. Emergency contact is to be by phone but then followed by email as per the above details in section 5.1.2. Glenorie Holdings Directors and the CEVA CEO and /or Operations Manager are also to be notified if any Government Agency is notified. An Emergency contact List is also attached as part of the Emergency Evacuation Procedure and a public contact list has been sent to the four immediate neighbours and is attached to their letters.

### 5.4.2. Site control – incident response

Control of the site during a pollution incident is through the Bioproperties Operations Manager who will liaise with the CEVA Operations Manager, Bioproperties Engineering Manager, the Glenorie Holdings Capital Works Manager, the **Bioproperties Assistant Operations Manager, the Bioproperties Human Resources Support Manager**, CEVA WHS Officer and any outside services who are required to attend the site to rectify the pollution or potential pollution risk.

If required the Emergency Evacuation Procedure will be activated to have all staff relocate to the appropriate emergency evacuation point.

## 5.5. Procedures for notifying pollution incident to EPA, local councils or relevant authorities

The contact details of the relevant authorities are available above and the Bioproperties Operations Manager will be responsible for assessing the situation and information from the CEVA Operations Manager and the Bioproperties Engineering and Services manager and then making the decision on the need to contact the relevant authorities.



## 6. EARLY WARNINGS AND COMMUNICATIONS TO NEIGHBOURS

### 6.1. Community communication and consultation

Bioproperties, as the long term tenant of Glenorie Holdings understands its responsibilities to enable the community and immediate neighbours to contact the operators of 11-15 Moores Rd Glenorie and to keep the community and immediate neighbours informed of a pollution incident if when one eventuates.

Letters to the four closest neighbours dated 5<sup>th</sup> February 2015 were placed in letter boxes on 6<sup>th</sup> February 2015. A copy is attached and provides background, reasons and contact details including afterhours phone numbers and on site company house address in case of an environmental emergency.

### 6.2. Website information

This Pollution Incident Response Management Plan (PIRMP) Website Information is being written to comply with the legislative requirements under the POEO Act 1997 and the Protection of the Environment Operations (General) Regulation 2009 s98D:

Any action plan resulting from a pollution incident is also to be made publicly available in the following manner within 14 days after it has been prepared.

Bioproperties Pty Ltd has its own website and has installed a pollution notification details for the Glenorie site and the office contact phone number. This information appears in two sections- contact us and facilities.

### 6.3. Availability and location of this Plan

On site the PIRMP folder will be kept in the BPL Operations Manager's office, the BPL Engineering and Services Manager's Office and in the CEVA Operations Manager's office and all are available to staff to access when necessary. Offsite a copy will be kept at the Glenorie Holdings Head Office at 34 Charter St Ringwood with the Company Directors.

### 6.4. Privacy Protection

The POEO (general) Regulation 2009 s98D (1) states:

1. A plan is to be made readily available:
  - a. To be authorized officer on request and
  - b. At the premises to which the relevant licence relates, or where the relevant activity takes place to any person who is responsible for implement the plan.

The availability of this PLAN will be made available on the Bioproperties Pty Ltd internal online network (H: drive). 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 sub clause (1).



# Pollution Incident Response Management Plan 2020

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Pollution Incident Response Plan for Glenorie Holdings at 11-15 Moores Rd Glenorie

If the 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 (eg 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.

## 7. TRAINING – SUMMARY AND REFERENCE TO PROJECT PROCEDURE

Both BIOPROPERTIES and CEVA have training procedures which plan and document training including competency testing. In addition the standard operating procedures are reviewed on a regular basis. A sample of the training records is in the PIRMP folder.

## 8. UPDATING OF PLAN

This PIRMP is to be reviewed following the EPA inspection planned for 2020 and then every 3 years.

## 9. TESTING

Competency testing of staff is set up and recorded as part of the GMP process and training records for BPL on relevant documents are attached.

The practical test on the spill response will also be documented in this same way.

The Liquid Waste management system is tested as per SOP -0329.

Minimum tests required:

**Weekly tests** include pH, alkalinity and chlorine.

**Monthly testing** pH of all holding tanks, visual inspecting and main receiving and storage tanks.

Every 3 months AST Services Pty Ltd inspects, reports and notifies Council that have serviced the waste system.

**Quarterly sampling** by our staff and testing by ALS and measured against the standards as per SOP0329.

## 10. IMPLEMENTATION OF THE PLAN

This plan will be rolled out by the Licence Holder and two Operating Companies immediately upon completion of the plan in February 2015.

### APPENDIX 1 - Pollution Incident Report Form

### APPENDIX 2 - Glenorie Site Hazardous Goods

### APPENDIX 3 - Occupational/Work Health and Safety Policy

### APPENDIX 4 - Risk Assessments



# APPENDIX 1

## Pollution Incident Report Form



## APPENDIX 2

# Glenorie Site Hazardous Goods



# APPENDIX 3

## Occupational/Work Health and Safety Policy



# APPENDIX 4

## Risk Assessments