



Title: POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN EPA Licence No. 6990	Number:	ENV-4.4.7-001
	Revision:	I
	Date:	05/2023
	Owner:	D. Awopetu
	Page:	1
Status:		CONTROL
Refer Last Page for Review Table		

Content and Format Concurred					
Quality		Environment		OHS	
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Distribution		Availability Confirmed (Date)
1.	Security Office	
2.	Spill Response Information & Equipment Centre	
3.	Head Office Reception	
4.	Quality / Environmental Manager Office	
5.	Rheem Intranet	
6.	Rheem Australia website (website version)	

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Pollution Incident Response Management Plan

Purpose and Scope

This Pollution Incident Response Management Plan (PIRMP) applies to Rheem Australia's Rydalmere site (the site) only.

The purpose of this PIRMP is to:

- Define the steps and actions to be taken in responding to pollution incidents on the site.
- Provide information relevant to preventing and responding to pollution incidents, including:
 - The types and quantities of potential pollutants on the site
 - The risks associated with potential pollutants on the site and the measures in place to control those risks.
 - The safety and environmental protection equipment on the Site
 - Names and contact details of Rheem personnel responsible for implementing the PIRMP.
 - Contact details of relevant Rheem personnel, nearby premises, relevant authorities, emergency services
 - Diagrams showing:
 - The location of the site
 - Nearby areas that may be affected by pollution incidents.
 - The locations of potential pollutants on the site
 - The locations of pollution incident response equipment on the site
 - The location of stormwater drains on the site.
 - The locations of dangerous goods and fire hydrant
- Define the arrangements for testing, review, and maintenance of the PIRMP.
- Define the requirements for training of relevant Rheem personnel in relation to the PIRMP.

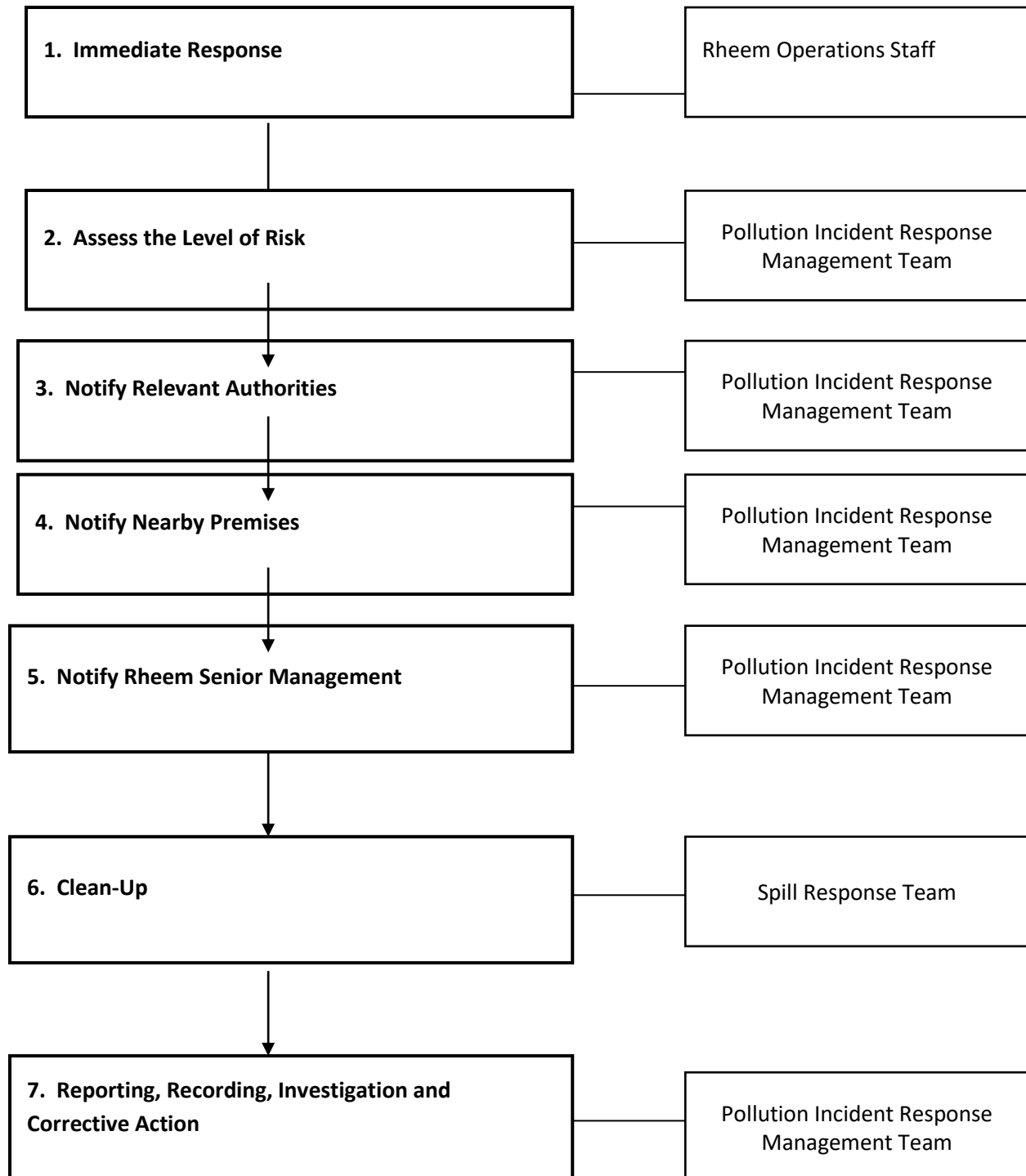
Legislative requirements

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation).

In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection licence relates (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation (clause 98E).

Pollution Incident Response Procedure and Responsibilities



1. Immediate Response

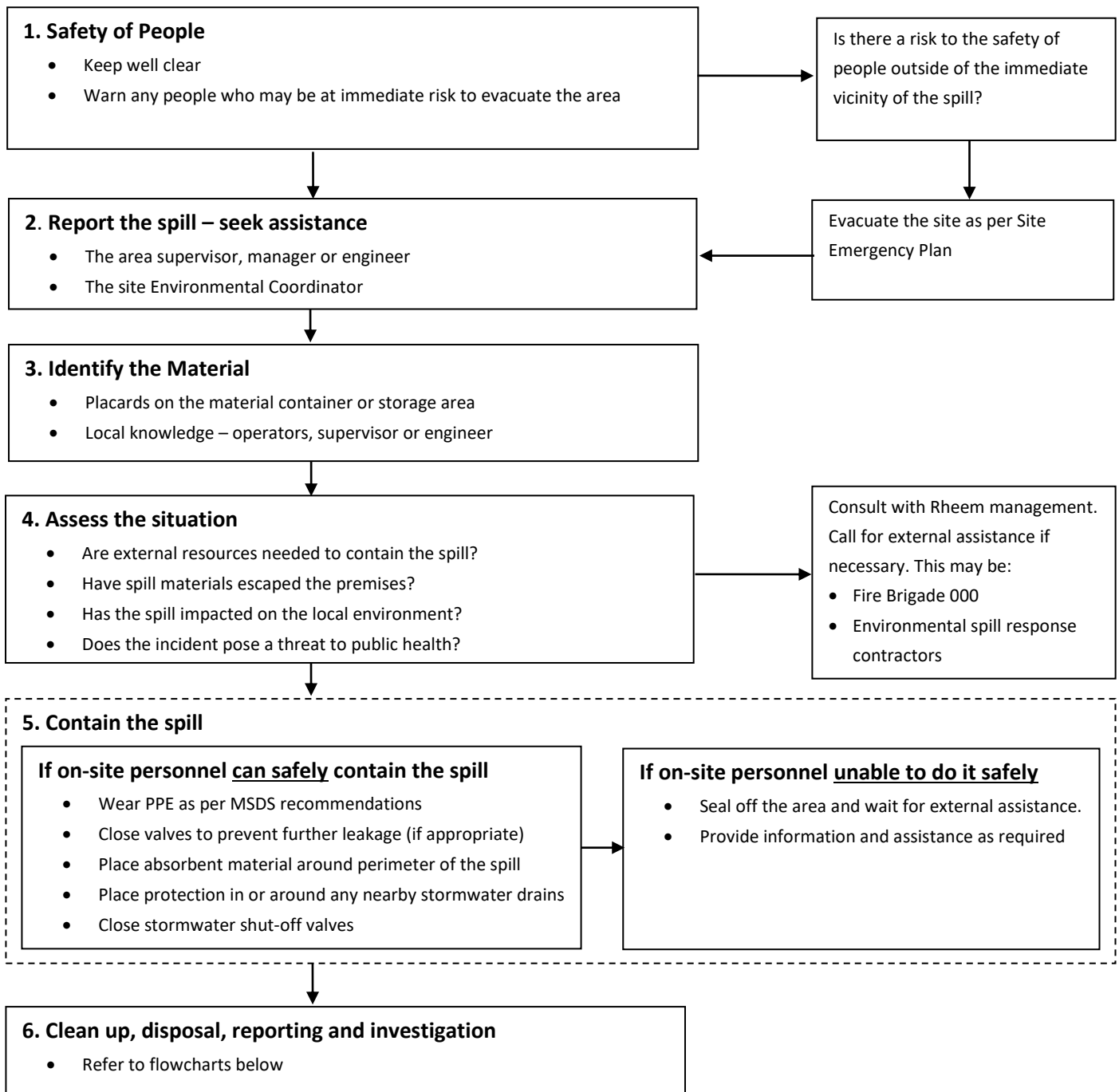
The health and safety of people shall at all times override all other considerations.

No person is to approach or attempt to contain any pollution incident chemical spill unless they:

- Have identified the materials involved.
- Are familiar with the safety hazards of the materials and the safety procedures for approaching and handling the materials (refer to SDS)
- Are wearing the PPE required for the materials (refer to SDS)

Refer - ENV-PWI-104

Internal Spill Response Team Contacts



2. Assess the Level of Risk



Harm to the environment means:

- Actual or potential harm to the health or safety of people or to ecosystems that is not trivial.
- Or
- Actual or potential loss or property damage exceeding \$10,000.

Harm to the environment includes harm or loss that is either on or off Rheem premises.

3. Notify Relevant Authorities

Rheem will notify the following authorities immediately on becoming aware of a pollution incident that causes or is likely to cause harm to the environment.

Authority		Contact Number
Environment Protection Authority		131 555
SafeWork NSW Authority		131 050
NSW Health	Parramatta Public Health Unit (Western Sydney LHD)	(02) 9840 3603
Fire and Rescue NSW		000 OR 1300 729 579
Parramatta City Council		1300 617 058 OR (02) 9806 5050

Activation of PIRMP means:

Rheem Australia is required to immediately notify the regulatory authorities in accordance with the POEO Act s148 where a pollution incident has occurred that is causing or threatening material harm to the environment or property damage exceeds \$10,000.

- NSW EPA (where the EPA is not the regulatory authority);
- NSW Health (local Public Health Unit)
- SafeWork NSW;
- Local Council; and
- Fire and Rescue NSW.

'Immediately' has its ordinary dictionary meaning of promptly and without delay.

Partial Activation of PIRMP means:

A pollution incident has occurred, and Emergency Services have attended site, but pollution has not left the site and property damage does not exceed \$10,000.

- *In this case a brief explanation must be included in the next EPA annual return*

Harm to the environment means:

- Actual or potential harm to the health or safety of people or to ecosystems that is not trivial.
or
- Actual or potential loss or property damage exceeding \$10,000.

Harm to the environment includes harm or loss that is either on or off Rheem premises.

4. Notify Nearby Premises

If a pollution incident is likely to affect the health and safety of people or cause property damage on nearby premises, Rheem shall provide notifications to effected premises:

- Immediately on becoming aware of a pollution incident which is affecting, or is likely to affect, nearby premises.
- At regular intervals throughout the duration of the pollution incident, appropriate to the nature of the incident and the level of risk
- At the conclusion of the pollution incident

Methods of Notification

The methods of notification will be appropriate to the nature of the incident, the level of risk, and the number and type of premises affected.

Notifications will be by one or more of the following methods:

- Telephone
- In person, door-to-door
- Letterbox drops.
- By Emergency Services personnel

Notifications to Nearby Premises by Emergency Services

If Emergency Services respond to and take control of a pollution incident, they may also take control of communications with nearby premises, including conducting evacuations if deemed necessary. In such circumstances the Rheem person responsible for managing the response to the pollution incident will liaise with Emergency Services so as to have a clear understanding of who is responsible for communications with nearby premises.

Information to be Provided.

Nature of incident	<ul style="list-style-type: none">• e.g., chemical fumes, smoke, airborne dust, flammable gas
The specific pollutant involved	<ul style="list-style-type: none">• e.g., LPG, steel dust, cyclopentane vapour, acid fumes, toxic smoke
Nature of risk	<ul style="list-style-type: none">• e.g., exposure to fumes, smoke, or dust; fire or explosion
Level of risk	<ul style="list-style-type: none">• Negligible. No immediate response required.• Minor – recommend prepare for evacuation or other appropriate actions to protect people and property.• Major – recommend evacuation or other appropriate actions to protect people and property
The likely duration of the incident	

5. Notify Rheem Senior Management if Necessary

Rheem Senior Management must be notified immediately on becoming aware of a pollution incident that causes or is likely to cause harm to the environment.

Harm to the environment means:

- Actual or potential harm to the health or safety of people or to ecosystems that is not trivial or
- Actual or potential loss or property damage exceeding \$10,000.
- Harm to the environment includes harm or loss that is either on or off Rheem premises.

Senior Management to be notified:

- G.M. Operations
- Managing Director ANZ

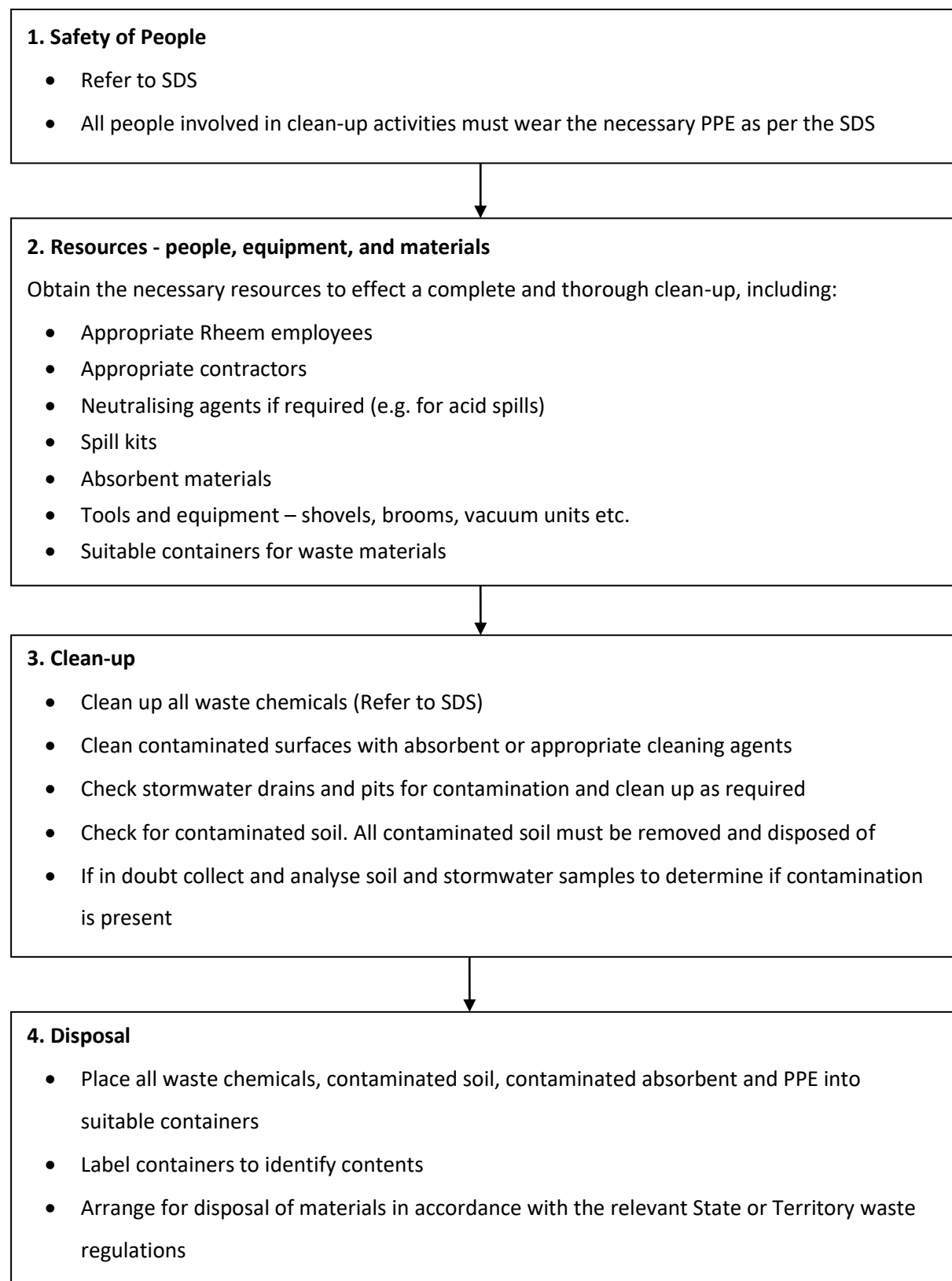
For chemical spills which:

- Are greater than 200L or 200kg, or
- Cause actual harm to people or the environment, or
- Require evacuation of personnel, or
- Require calling of emergency services, or
- Require notification to the Environmental Regulator

Notify as soon as practicable but **no later than 1 hour after the spill:**

1. Sustainability and Environmental Lead
2. Senior Site Manager
3. Relevant General Manager (e.g., GM Operations)
4. Managing Director ANZ

6. Clean-Up and Disposal of Waste



7. Reporting, Recording, Investigation and Corrective Action

All pollution incidents shall be reported, recorded, investigated and appropriate corrective actions established and implemented in accordance with Rheem procedures:

- WHS-RAU-MAN-001 Work Health & Safety Manual
- Rheemnet Vault Portal Incident Investigation Report
- ENV001 Spill Report Form

Information

Potential Pollutants

Type	Description	Maximum Quantity on Site
Liquids	Polyol / cyclopentane mixture	20,000 L
	MDI (Isocyanate)	25,000 L
	Porcelain enamel mixture (raw material)	20,000 L
	Porcelain enamel mixture (waste)	20,000 L
	SMG drawing oil	4,000 L
	SMG wash water	5,000 L
	SMG drawing oil / wash water mixture (waste)	10,000 L
	Hydraulic and other oils	4,000 L
	Propylene glycol	10,000 L
	Process water for water heater testing	70,000 L
	Potassium hydroxide solution (SMG Wash Detergent)	600 L
	Oil / porcelain enamel / water mixture (waste)	5,000 L
	Sodium hydroxide solution (30%)	1,000 L
	Hydrochloric acid (16%)	2,000 L
	LPG	5,000 kg
	Refrigerant gas	2,000 kg
	Natural gas (in pipelines)	
	Steel dust	10,000 kg
	Porcelain enamel cake (waste)	10,000 kg
	Porcelain enamel dust	5,000 kg
Gases		
Solids	Dry Enamel (waste)	10,000 kg

Potential Hazards to Human Health and Environment

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
Polyol / Cyclopentane mixture	Water pollution. Harm to aquatic ecosystems Air pollution. Smoke and fumes from fire involving cyclopentane.	Skin and eye contact, exposure to vapours, slip hazards. Fire and explosion Exposure to smoke and fumes from fire involving cyclopentane	Exposure to smoke and fumes from fire involving cyclopentane	Low	Spills or leaks from containers (IBCs) Spills or leaks from material transfer or processing equipment Fire or explosion involving cyclopentane vapours	Maximum container size = 1,000L Containers are stainless steel DG rated IBCs. All IBCs are located within a bunded storage area or on spill containment pallets. Material transfer pumps and processing equipment are located within a bunded room and within central internal area of factory building. Continuous automatic monitoring of cyclopentane vapour levels within storage, transfer, and processing areas. Monitoring system linked to site evacuation alarm. Automatic site evacuation and shutdown of transfer and processing equipment if cyclopentane vapour level reaches 30% of LEL. Continuous ventilation of storage, transfer, and processing equipment areas Potential ignition sources excluded from storage, transfer, and processing equipment areas. Automatic fire protection sprinklers in transfer and processing equipment areas

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
MDI (Isocyanate)	Water pollution. Harm to aquatic ecosystems Air pollution. Smoke and fumes from fire involving MDI. Soil contamination	Skin and eye contact, exposure to vapours, slip hazards. Exposure to smoke and fumes from fire involving MDI	Exposure to smoke and fumes from fire involving MDI	Low	Overflow or leaks from bulk storage tank Spills or leaks from material transfer or processing equipment Fire or explosion involving MDI. Spills or leaks from road tanker, transfer pump or piping during delivery and transfer of MDI to bulk storage tank	Bulk storage tank located within a bund area. Automatic monitoring of bulk storage tank level. High level sensor prevents further transfer of MDI to bulk storage tank. Material transfer pumps and processing equipment are located within bund areas and within central internal area of factory building. Transfer piping from bulk storage tank to processing equipment is fully welded to eliminate leaks. Road tanker, transfer pump and piping located within bund area during MDI transfer to bulk storage tank. Procedure in place for transfer to storage tank. Nitrogen blanket applied to bulk storage tank and processing tanks to prevent MDI vapour generation. Continuous fume extraction in processing equipment areas to eliminate MDI vapour build-up. Automatic fire protection sprinklers in processing equipment areas

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
Porcelain enamel mixture (raw material)	Water pollution. Low level harm to aquatic ecosystems Soil contamination	Slip hazards	None	Low	Leaks, spills, or overflows from storage tanks Spills during forklift transport of storage tanks and drums between processing area	Storage tanks located inside of factory buildings and within bund areas or surrounded by in-floor waste drains. Storage tank filling is controlled manually, eliminating potential overfilling through failure of automatic filling methods. Storage tanks are covered during forklift transport. Maximum storage tank size transported = 1000 L
Porcelain enamel mixture (waste)	Water pollution. Low level harm to aquatic ecosystems Soil contamination	Slip hazards	None	Low	Leaks, spills or overflows from enamel waste in-floor drains, treatment tanks or transfer pumps	In-floor collection drains are all located inside of factory buildings. Levels in drains are clearly visible at all times. Sumps at end of drains are pumped automatically or manually to enamel waste treatment plants. Solid enamel build-up in drains is cleaned out manually when required. Enamel waste treatment tanks are located within covered bund areas. Waste transfer pumps are located within bund areas or adjacent to in-floor drains. Enamel waste treatment tanks are fitted with automatic level controls to prevent further inflow of enamel waste if tanks are full. Bund areas for enamel waste treatment tanks are fitted with automatic liquid level sensors to prevent further inflow of enamel waste if liquid is present in bunds.

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
SMG drawing oil	Water pollution. Harm to aquatic ecosystems	Slip hazard	None	Low	Spills or leaks from containers (IBCs) Spills or leaks from transfer pump Oil run-off from SMG Line	Maximum container size = 1,000L All IBCs are located within a covered bund storage area or on a spill containment pallet. Transfer pump is located in IBC which is located on a spill containment pallet. All oil run-off from SMG Line falls directly into a collection pit or in-floor collection drains
SMG wash water	Water pollution. Significant harm to aquatic ecosystems Soil contamination	Skin and eye contact, exposure to hot caustic liquid	None	Low	Overflow or uncontrolled discharge of wash water from washing machine	Automatic control of water level in washing machine Washing machine is surrounded by in-floor collection drains which feed directly into a waste holding pit. Piped discharge from washing machine is via automatic and manual valves, both of which must be open to allow discharge. Automatic valve will close if liquid level in holding pit is at high level.
SMG drawing oil / wash water mixture (waste)	Water pollution. Significant harm to aquatic ecosystems Soil contamination	Skin and eye contact, exposure to hot caustic liquid	None	Low	Overflow from liquid waste in-floor collection drains and holding pit	In-floor collection drains feed directly into waste holding pit Automatic level monitoring system in holding pit linked to local and remote alarms. High level sensor in holding pit shuts off water supply to SMG area, discharge from SMG washing machine and shuts down operation of SMG washing machine.

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
						Waste level in holding pit is clearly visible at all times. Weekly emptying of SMG washing machine into holding pit is carried out manually. Waste holding pit is emptied twice weekly by a waste removal contractor.
Hydraulic and other oils	Water pollution. Harm to aquatic ecosystems Soil contamination	Slip hazard	None	Low	Spills or leaks from containers (IBCs and drums) Spills or leaks from hydraulic power units, gearboxes on production machinery, transformers, or air compressors	Largest container size = 1,000 L All containers are located within covered bund storage areas, on spill containment pallets or in dangerous goods storage cabinets. All hydraulic power units and gearboxes are located inside of factory buildings. Large hydraulic power units have integral spill containment trays. Transformers and air compressors are contained within steel bunds. All oil leaks are promptly cleaned up to avoid potential environmental or safety hazards.
Propylene glycol	Water pollution. Harm to aquatic ecosystems. Soil Contamination	None	None	Low	Spills or leaks from containers (1000L IBCs)	Largest container size = 1,000 L All containers are located within covered bund storage areas or on spill containment pallets
Process water for water heater testing	Minor water pollution	None	None	Low	Overflow from water storage tanks.	Tanks containing treated water (chlorinated) are contained within covered bund areas.

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
					Leaks from storage tanks due to physical impact damage.	Tanks are fitted with level sensors to prevent overflow and/or overflow directly to sewer. Tanks are protected from physical impact damage by concrete bunds, steel barriers or other equipment
Potassium hydroxide solution SMG Detergent	Water pollution. Harm to aquatic ecosystems	Skin and eye injury hazards	None	Low	Spills or leaks from containers (200L drums)	Largest container size = 200 L All containers are located within a covered bund storage area, on a spill containment pallet, or are surrounded by in-floor waste drains. All containers are located within covered bund storage areas or on spill containment pallets.
Oil / porcelain enamel / water mixture (waste)	Water pollution. Harm to aquatic ecosystems Soil contamination	Slip hazard	None	Low	Overflow from storage tank	Storage tank is located within a covered steel bund. High level sensor on storage tank initiates local alarm and disables transfer of further liquid into tank.
Sodium hydroxide solution (33%)	Water pollution. Harm to aquatic ecosystems	Skin, eye and respiratory hazards	None	Low	Spills or leaks from containers (1000L IBC and 200L drums)	Largest container size = 1,000 L All containers are located within covered bund storage areas.

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
						Open containers are located within locked enclosures within bund areas.
Hydrochloric acid (16%)	Water pollution. Harm to aquatic ecosystems	Skin, eye and respiratory hazards	None	Low	Spills or leaks from containers (1000L IBC)	Maximum quantity on site = 2 x 1,000L IBC 1x Container is located within locked enclosure within a covered bund area. 1x Container in locked bund area Door 1
LPG	Air pollution. Photochemical smog. Global warming impact.	Exposure to LPG vapour. Skin, eye, respiratory hazards. Fire and explosion risk	Fire and explosion risk	Low	Leaks or other uncontrolled discharge from storage cylinder	Storage cylinder and compound comply with AS1596, including: <ul style="list-style-type: none">• Impact barriers• Fire rated wall between storage cylinder and adjacent building• Firefighting equipment
Refrigerant gas	Air pollution. Global warming impact.	None	None	Low	Leaking from refrigerant gas storage cylinders or during charging of water heaters	All refrigerant gas storage & handling, including charging of water heaters, is conducted in under an Australian Refrigeration Council “Refrigeration and Air conditioning Equipment Manufacturing Authorisation” and complies with all conditions thereof, including controls to prevent leakage.
Natural gas (in pipelines)	Air pollution. Photochemical smog. Global warming impact.	Fire and explosion risk	Fire and explosion risk	Low	Leaks or other uncontrolled discharge from natural gas pipelines or combustion equipment	Pipelines are protected from physical damage by appropriate barriers. Gas usage is monitored for indications of leakage.

Pollutant	Potential Hazards			Likelihood of Hazard Occurring	Conditions or Events That Could or Would Increase the Likelihood	Control Measures in Place
	Environmental	Human Health				
		On-Site	Off-Site			
						Main items of combustion equipment, such as furnace and ovens, are fitted with safety devices to prevent release of gas without combustion
Steel dust	Air pollution – steel dust. Fallout impact on waterways, buildings, vehicles	None	None	Low	Failure of dust collector filters	Dust collectors fitted to all steel dust generation points. Dust collectors are fitted with secondary discharge filters. Continuous monitoring of particulate levels from all dust collectors Regular inspections & maintenance of dust collectors
Porcelain enamel cake (waste)	Water pollution. Low level harm to aquatic ecosystems	None	None	Low	Stormwater contamination due to run-off from waste storage bins	All bins of enamel cake are stored inside of factory building or in a covered bund storage area
Porcelain enamel dust	Air pollution – enamel dust. Fallout impact on waterways, buildings, vehicles	Exposure to enamel dust	Exposure to enamel dust	Low	Failure of spray booth filters or dust collector filters	Dust collectors or spray booth filters fitted to all enamel dust generation points. Continuous monitoring of particulate levels from all dust collectors Regular inspections & maintenance of dust collectors

Pollution Prevention, Control and Response Equipment

This section details the equipment that is in place to prevent, control and respond to pollution incidents and minimise risks to human health and the environment.

The equipment that is in place is as follows:

- Two stormwater drain shut-off valves
- 10 small spill kits containing spill containment and clean-up materials and PPE.
- 1 small acid spill kit located in Oily waste treatment plant bund area.
- 2 large spill kits containing spill containment and clean up materials and PPE.
- 4 sand boxes
- 1 pallet of sandbags
- Bunding for chemical storage tanks and containers
- Automatic level controls on critical chemical storage tanks and pits
- Liquid level sensors in critical bund areas
- Flammable vapour detection system, ventilation, and exclusion of potential ignition sources at Polyol / Cyclopentane areas
- Automatic continuous monitoring of particulate emission levels from dust collectors and enamelling spray booths
- Automatic continuous monitoring of trade waste discharge water quality

Responsible Rheem Personnel

This section details the responsibilities of Rheem personnel in responding to pollution incidents.

Rheem Pollution Incident Response Management Team Responsibilities Activating PIRMP and managing response to pollution incidents Assessing level of risk Notifying relevant authorities Notifying nearby premises Notifying Rheem Senior Management		
Position	Name	24-Hour Contact Number
Operations Manager	Steve McRae	0448 664 710
Quality Manager	Freddy Loh	0425 309 137
Sustainability and Environmental Lead	Deji Awopetu	0474 022 656
Sustainability and Environmental Coordinator	Natalie Mok	0429 978 125
Maintenance Manager	Daniel Hines	0423 779 683

Rheem Operations Staff Responsibilities <ul style="list-style-type: none"> • Immediate Response • Other tasks as assigned by Pollution Incident Response Management Team 		
Positions		
Production Managers		
Production Supervisors		
Engineering personnel		
OHS personnel		
Maintenance leading hands		

Rheem Spill Response Team Responsibilities <ul style="list-style-type: none"> • Containment and clean-up • Other tasks as assigned by Pollution Incident Response Management Team 		
Position	Name	Contact Number
Sustainability and Environmental Lead (Spill Response Co-Ordinator)	Deji Awopetu	0474 022 656
Sustainability and Environmental Coordinator	Natalie Mok	0429 978 125
Team members (Emergency spill response contacts)	Refer: ENV-PWI-104 for members	

Contact Information

This section details the contact information for the following personnel and organisations:

- Rheem personnel
- Nearby premises
- Emergency Services
- Emergency spill response contractor
- Relevant authorities

	Operations Manager	Steve McRae	0448 664 710
	Quality Manager	Freddy Loh	0425 309 137
	Maintenance Manager	Daniel Hines	0423 779 683
	Sustainability & Environmental Lead	Deji Awopetu	0474 022 656
	Sustainability & Env. Coordinator	Natalie Mok	0429 978 125
	OHS Manager	Parth Patel	0408 450 212
	Chief Warden	Nick Vlismas	0432 134 025
	Security		(02) 9684 9261
	G.M. Operations	Gary Higgs	0434 324 633
	Managing Director ANZ	Chris Taylor	0403 903 751
Nearby premises	i.e., Industrial Estate		(02) 9725 5542 0404 478 092
	Demolition Plus		(02) 98183777
	Parramatta City Council Depot (2019 Pending development)		(02) 9806 5050
Emergency Services	Fire and Rescue NSW, Ambulance, Police		000
Emergency spill response contractor		Transpacific	1800 774 557
Relevant Authorities	Environment Protection Authority		131 555
	SafeWork NSW Authority		131 050
	NSW Health	Western Sydney Public Health Unit – North Parramatta	(02) 9840 3603
	Fire and Rescue NSW		000
	Parramatta City Council		(02) 9806 5050

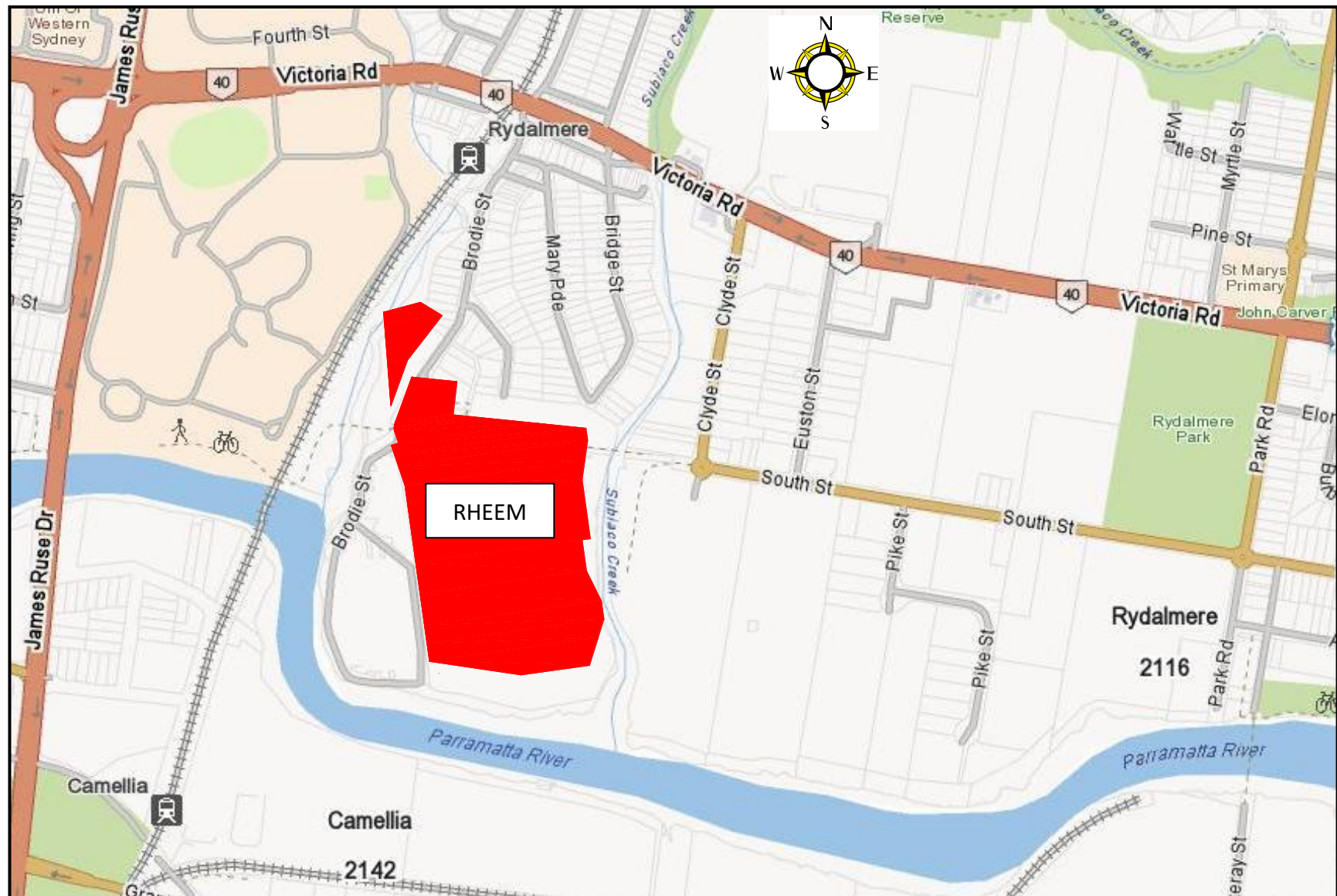
Related Rheem Procedures

Document	Number
Emergency Evacuation Procedures – Rydalmere Site	WHS-RYD-PRO-013
Incident Reporting, Recording and Investigation Procedure	WHS-RAU-MAN-001 Safety Manual
Incident Investigation Report	Rheemnet Vault Portal

Diagrams

This section provides the following diagrams:

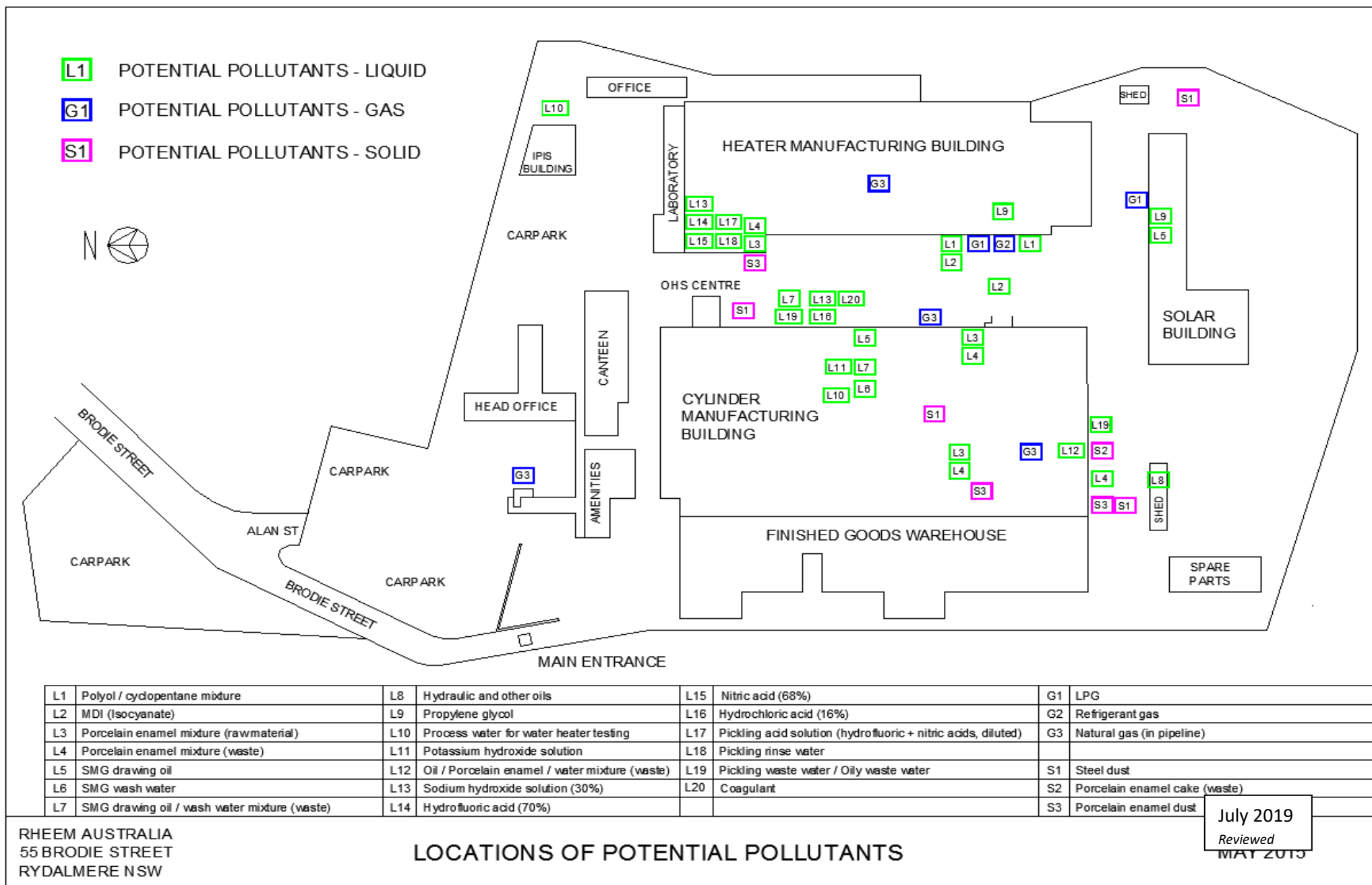
- Site location map
- Site photograph showing nearby premises.
- Locations of potential pollutants
- Locations of Pollution Incident Response Materials and Equipment
- Stormwater system diagram
- Dangerous goods & Fire hydrant

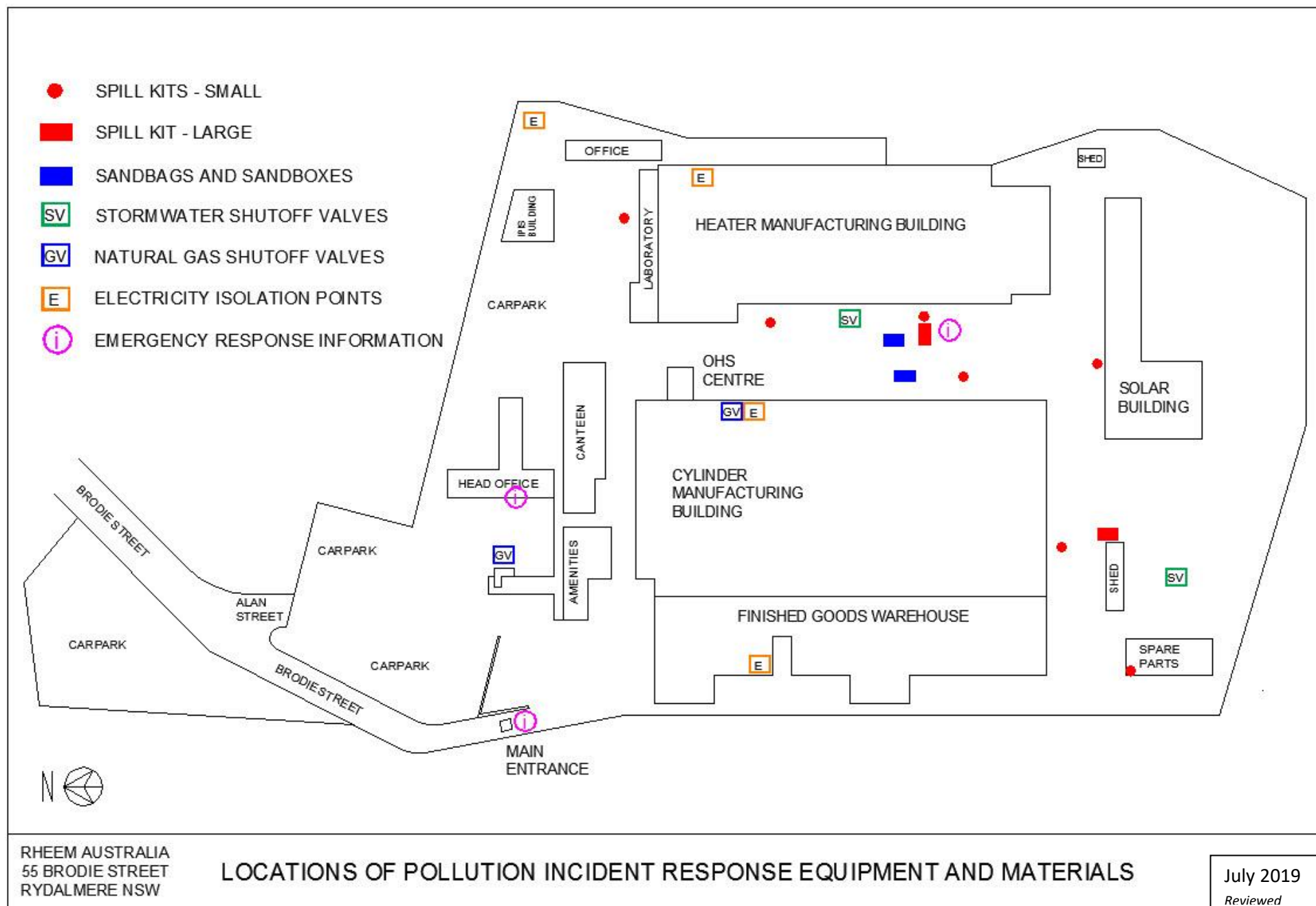


Site Location Map Rheem Australia

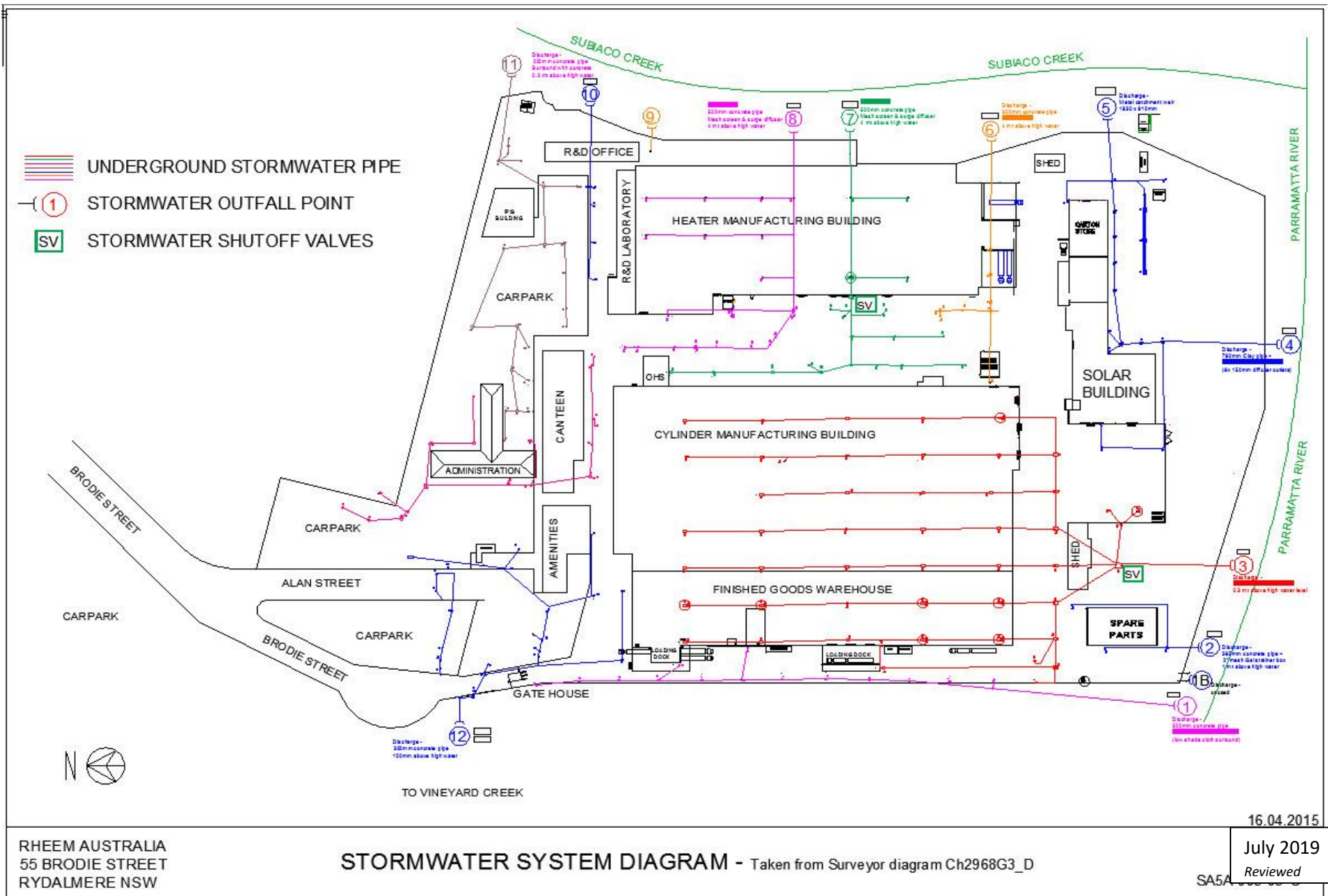


Site Photograph Showing Nearby Premises (55 Brodie Street Rydalmere NSW)

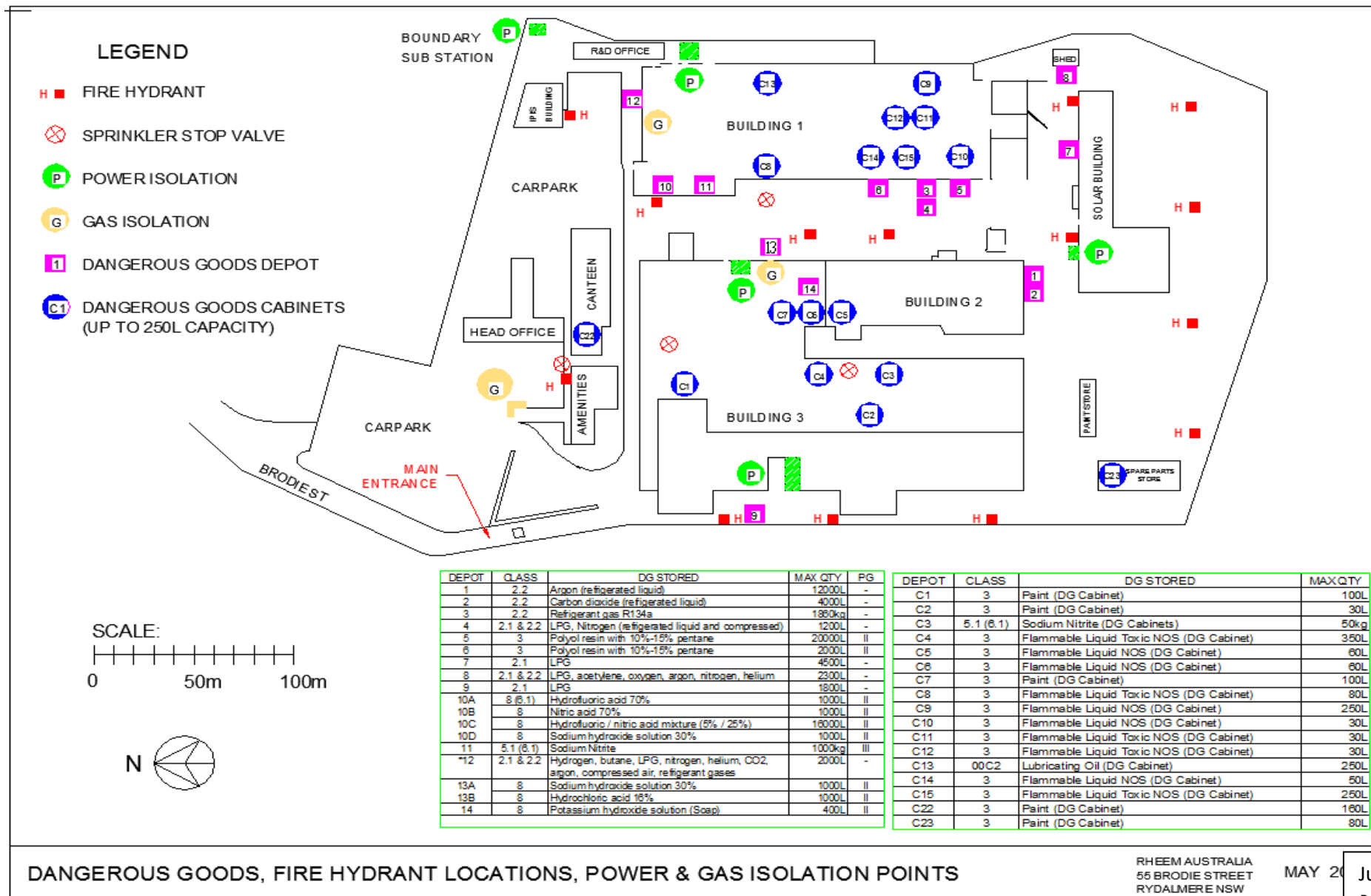




Location of Pollution Response Equipment



Location of Stormwater Drains



Location of Dangerous Goods and Fire Hydrants

Testing, Review and Maintenance of This PIRMP

This section details the arrangements for testing, review, and maintenance of this PIRMP in terms of:

- The information contained within the PIRMP.
- Pollution response equipment
- Workability and effectiveness of the PIRMP
- Knowledge and readiness of relevant Rheem personnel in implementing the PIRMP.

Component		Action	Frequency
PIRMP		Check that copies are in place	Annually
		Complete review Update as required	Annually Within one month following all pollution incidents (actual and drills)
Information	List of potential pollutants	Review Check accuracy. Update as required	Annually
	Responsible Rheem personnel		
	Contact information		
	Diagrams		
Pollution response equipment	Spill kits, sandbags, and sandboxes	Check and replenish contents as needed	Monthly
	Stormwater shut-off valves	Test operation	
Workability, effectiveness, knowledge, and readiness		Pollution incident response drill	Annually

Pollution Incident Response Drills

Testing, review & maintenance of the PIRMP shall take the form of spill trigger, alternatively if no trigger activates this testing within a twelve-month period, then a drill will be conducted based on simulated pollution incident. For each drill the nature of the simulated incident shall vary in terms of:

- Location of incident
- Pollutant
- Cause of incident

Records of Testing and Review

Records of monthly checks and tests as detailed above shall be maintained with Environmental Records

Records of annual reviews & updates of this PIRMP and testing of this PIRMP as detailed above shall be maintained below.

Review of PIRMP			Testing of PIRMP		
Date	Conducted by	Outcomes / Amendments	Date	Conducted by	Outcomes / Amendments

Details of Testing

Date of test		Location		Pollutant	
Basis of test					
People involved:					
Outcomes	Immediate response		Spill response materials & equipment available and operational		
	Assessment of risk		Clean up & disposal of waste		
	PPE & MSDS available		Incident reporting, recording, investigation & corrective actions		
	Internal notifications	Area Supervisor or Manager			
		Operations Manager			
		Sustainability & Env. Lead			
		Rheem Senior Management			
	External Notifications	Relevant Authorities			
		Nearby premises			
Comments & notes					

Training

This section details the training requirements in relation to this PIRMP.

Records of training shall be maintained with employee training records.

Personnel	Training Requirement	Training Method	Training Frequency
Pollution Incident Response Management Team	PIRMP Induction Specific responsibilities	In-house training session	Annually or within one month after any reported incident
Spill Response Team	PIRMP Induction Specific responsibilities	In-house training session	Annually or within one month after any reported incident
All other employees and contractors	General information and awareness	Employee induction Contractor induction Employee noticeboards Employee communication sessions	Ongoing

END DOCUMENT

Revision	Details of changes to Document	Date	Review
I	Content, Contact information and signatories updated	05/2023	DA
H	No Changes	02/2022	RT
H	No Changes	11/2021	RT
H	Replace S. Conway with R. Tjiam, as Spill Response Co-Ordinator	11/2020	RT
G	No Changes	04/2020	RT
G	Reviewed and Contact information updated. <i>Updated as per "Appendix B: PIRMP template July 2019"</i>	07/2019	SC
F	Reviewed – Changes to testing plan / contact details	11/2018	SC
E	Reviewed and Contact information updated.	10/2017	SC
D	Reviewed and Contact information updated	08/2016	SC
C	Review date removed from front page, Remove pickling acid etc	11/2015	SC
B	No Changes	10/2015	SC
B	Content and Format changed + Review table added	05/2015	
A	Initial Release	08/2012	