**FUCHS LUBRICANTS (AUSTRALASIA) PTY LTD**

**2 HOLLAND STREET**

**WICKHAM NSW**

**POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

**ENVIRONMENTAL PROTECTION LICENCE No.10181**

**Public Version**

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**1 INTRODUCTION**

* 1. **Facility Details**

The facility details, as defined in Environmental Protection Licence 10181, are summarised in table 1.1.

**Table 1.1 Facility details**

|  |  |
| --- | --- |
| **Company** | Fuchs Lubricants (Australasia) PTY LTD |
| **Environmental Protection Licence (EPL) Number** | 10181 |
| **Scheduled Activities** | Chemical Production |
| **Facility Name & Address** | Fuchs Lubricants2 Holland Street Wickham NSW 2293 |

* 1. **Overview of Operations**

The premises and facilities associated with EPL 10181 are owned and operated by Fuchs Lubricants (Australasia) PTY LTD.

Fuchs is a wholly owned Australian subsidiary which has been supplying specialized lubricants since the late 1890’s and is the leading market player in many lubricant sectors.

Fuchs Lubricants specializes in five main areas of lubrication:

• Automotive

• Industrial

• Specialist Applications including Open Gearing Lubrication

• Mining

• Private Label

Manufacturing facilities are located in Melbourne and Newcastle, all with ISO9001 and AS4801 accreditation and individual distribution, R & D and quality control capabilities. The Melbourne and Perth sites also hold ISO 14001 accreditation.

The Newcastle site specializes in Mining Lubricants. EPL 10181 covers the premises and facilities at Newcastle NSW.

The production process at this site involves the importation of base oils and raw materials, some of which are dangerous goods, which are then used to locally manufacture oils by blending in bulk blending tanks. Finished product is then pumped into bulk tankers or packaged into a number of different container sizes ranging from 10L to 1000L containers. Packaged goods are warehoused onsite and then distributed across the country by third party freight contractors.

Imported base oils and finished goods are also stored onsite in bulk tanks, of which the largest tank has a maximum capacity of 155,000L.

Waste product as part of the manufacturing process is drained into a sump onsite. The sump is drained out regularly and its contents taken offsite as prescribed waste. The draining of the sump is undertaken by a licensed waste contractor.

**1.3 Plan Objectives**

This Pollution Incident Response Management Plan (PIRMP), ENV 228, has been developed in accordance with the requirements of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulations 2012.

Fuchs Lubricants has developed a PIRMP to meet legislative requirements. This abridged version of the PIRMP has been developed to meet the requirements for publicly availability of the plan.

The objectives of the plan and the abridged version of the PIRMP (as in EPA’s Environmental guidelines for the preparation of pollution incident response management plans) are to:

* Ensure timely and comprehensive communication about a pollution incident on site to all staff at the premises (and head office - Melbourne), the Environmental Protection Authority (EPA), other authorities and the community who may be affected by the impacts of the incident;
* Minimize and control the risk of a pollution incident at the facility by identifying any environmental risks that are present and develop action plans to minimize and manage those identified risks.
* Ensure the plan is implemented by trained employees, identify and train employees responsible for its implementation, and ensure the plan is regularly tested and modified where required to its effectiveness.

**2** **HAZARD/POLLUTION IDENTIFICATION**

**2.1 Pollutant Inventory**

Due to the nature of the business, the products manufactured and/or stored on site are considered potential pollutants.

**2.2 Hazard Identification & Assessment**

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 a 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 a premise, but it does not include an incident of circumstances involving the emission of any noise”

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 Protection of the Environment Operations Act (PEOA) as:

1. Harm to the environment is material if:
2. It involves actual or potential harm to the health & safety of human beings or to the ecosystems that is not trivial, or
3. It results in actual or loss of property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such amount as is prescribed by the regulations), and
4. 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.

An assessment of the site was undertaken to identify the main hazards to human health or the environment associated with a potential incident at the facility.

The assessment details the event or likely cause, consequence, response controls and risk rating of the consequences.

**3 INCIDENT RESPONSE**

This section provides details on the incident response, including the communication and on site emergency response actions for responding to an incident that has resulted in a material impact to human health or the environment.

Incident occurs

Report incident and investigate as per emergency response procedure. Record incident in QUEST system.

Assess if potential pollutant i.e.is there a risk of harm to the environment or human health

 No

 Yes

Notify relevant agencies in order below:

**EPA 131 555 Fire & Rescue NSW: 1300 729 579 if warranted call “000” Work Cover Authority: 131050
Newcastle City Council: 02 4974 2000 Ministry of Health: 02 4924 6477**

Activate Emergency Response Team

Assess potential for off-site impacts to community & environment

Manage incident as per emergency response procedure

If, required notify community as per section 3.1.3

Provide regular updates to relevant government agencies and community

**3.1 Communication**

**3.1.1 Internal Communication (i.e. Employee/Contractors/Visitors)**

All incidents are to be reported immediately to Site Manager, hiring employee or employee visited.

**3.1.2 Government Agencies**

The key external contacts that are required to be notified are listed below. If a pollution incident occurs where “material harm” to the environment is caused or threatened the notification protocol set out in section 3 above is followed. If the incident presents an immediate threat to human health or property call **“000”**. If the incident does not require an initial combat agency immediately notify the authorities in the order listed in section below.

**Key Contacts Table**

|  |
| --- |
| **External Agencies** |
| **Ambulance, Fire or Police (Fire & Rescue NSW)** | **1300 729 579**Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again. |
| **Environment Protection Agency** | **131 555** |
| **Work Cover Authority** | **13 10 50** |
| **Newcastle City Council**  | **02 4974 2000**  |
| **Hunter Water** | **1300 657 000** |
| **Ministry of Health (Newcastle)** | **02 4924 6477(diverts to John Hunter Hospital)- ask for Public Health Officer on call** |

**3.1.3 Local community**

Community stakeholders that are potentially affected by a potential incident will be notified immediately by phone call after being instructed by one of the key site contacts. As detailed in the emergency response procedure any incident is communicated to immediate neighbours.

The communication method may change depending on the nature of the event or as directed by the relevant agency.

Regular updates if required will be provided to the affected community throughout the course of event by one of the key contacts.

**3.2 On-site Incident Management**

An emergency response procedure is in place for the site. This procedure outlines the actions required to be taken when there is an incident on site which may result in in a material impact to human health and/or the environment. This procedure and this plan will be used in-conjunction with each other to ensure that the impacts of pollution incidents are minimised as much possible to through early intervention.

**4 ADMINISTRATION**

This section of the plan provides details on the processes that will be used by employees onsite and offsite to make them aware of the plan requirements and document the process for regular testing of the plan.

**4.1 Staff Awareness/Training**

All new employees will be made aware of the requirements of the plan as part of their induction process. All employees participate annually in an emergency drill to ensure all are familiar with the requirements of the plan. .

In addition to the above induction and training, details of the plan will be provided to the key contacts and members of the emergency response team on site and off site.

Training requirements will be identified and the sites operation training matrix. Records of training will be maintained in personal files in head office (Melbourne).

**4.2 Plan Availability**

In accordance with Section 153D of the POEO Act, the plan is available to all site employees via the intranet. This plan has also been placed on the internet. A hard copy of the plan will also be available at the site in the emergency information box.

**4.3 Testing of Plan**

This plan will be tested once a year to ensure that the information contained within the plan is accurate and up to date.

Drills will be carried out and findings documented on the national corrective & preventive action system (QUEST system).