

<b>Callington</b> 	Document Name	Pollution Incident Response Management Plan (PIRMP)		
	Date of Issue	18/11/2025	Revision 1	Page 1 of 3

## Pollution Incident Response Management Plan

### Licence Number: EPL 21921

#### Scope:

This document describes the Pollution Incident Response Management Plan (PIRMP) of Callington Haven Pty, Ltd. 30 South Street, Rydalmer 2116, NSW.

#### Purpose:

Callington Haven Pty, Ltd, holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA). As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates. If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

#### Procedure:

This procedure will be relevant in the event of a pollution incident. A pollution incident is defined as if there is a risk of “material harm to the environment”. 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 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.

Callington Haven Pty. Ltd. performs the following operations on site:

- Storage of bulk raw materials and Finished goods
- Manufacture of Chemical products, such as Fuel additives, Paint strippers etc.
- Storage of DG and Non-DG Chemical products
- Blending and Filling of Chemical products into finished packages and Labelling.

Considerable effort has been made by Callington Haven Pty, Ltd to ensure that both the environment and personnel are not exposed to any undue hazard from these operations.

### **Storage of bulk raw materials and Finished goods:**

Raw materials are delivered in properly packed and labelled containers directly into the factory premises. The entire factory is bunded to ensure there is no release to the environment. The bunding capacity of the factory is capable of handling the entire volume of stored liquid raw material on-site. All the DG raw materials are delivered in bulk, and in sealed containers. Any container and pallecons are immediately stored within the bunded factory area on their designated area as per the DG Class of the chemicals.

### **Manufacture of Chemical products:**

The blending operation is done by the trained blenders in the close mixing tanks with the proper placards to indicate the hazardous chemicals. All strong acids and bulk raw materials are stored within the bunded factory area on their designated area as per the DG Class of the chemicals and hazard classification (a separate bunded area) within the bunded factory.

### **Storage of DG and Non-DG Chemical products:**

All strong acids and bulk raw materials are stored within the bunded factory area on their designated area as per the DG Class of the chemicals and hazard classification (a separate bunded area) within the bunded factory.

### **Blending and Filling of Chemical products into finished packages and Labelling:**

All filling of finished good is done within the bunded factory area. All finished product storage is also within the bunded factory area on their designated area as per the DG Class, including product awaiting despatch.

### **Assessment of Risk:**

Any chemical spill, whether from bulk storage, or individual packaged units is highly unlikely to occur.

Spills within the factory area can come from bulk storage, product transfer, or from individual packaging units, and these spills are isolated from the environment due to the factory bunding.

Spills in the storage shed or loading / unloading yard will come only from packaged units, Callington Haven Pty, Ltd. has a separate specific procedure to deal with any chemical spills that occur in this area. This procedure is titled “ERP-02 Loss of Containment” in Callington Haven Emergency Response Plan.

All new factory employees receive training on the procedure **ERP-02 Loss of Containment** as part of their company induction, delivered by external licenced agency Emergency Evacuation. Employee refresher training is conducted **biannually**. In addition, facilities and materials are inspected **alternate month** by the General Operation Manager and Production Manager.

Callington Haven Pty. Ltd. maintains an up-to-date inventory of stock levels for both raw materials and finished products. This is updated daily in the SAP system.

Bulk material is contained within a bunded area within the factory which is also bunded. Finished product is contained in sealed packaging in dedicated racking within the factory, which is bunded.

Responsibility for the plan, authorisation and response contacts are:

Ron Bell – General Operations Manager 02 9898 2750

Bilal Saqib – Production Manager 02 9898 2701

Relevant authority contacts are:

- the EPA, Environment Line on 131 555
- the Ministry of Health Ph: 02 4734 2022 (work hours) Ph: 02 9845 5555 (after hours)
- the WorkCover Authority – phone 13 10 50
- Paramatta Council – phone - 02 9806 5050
- Fire and Rescue NSW – phone 000.

In the case of a major spill or environmental hazard the Emergency Alarm will be sounded. All staff will immediately shut down critical equipment and proceed to the assembly area. The General Operation Manager (or other management team representative) will immediately notify the required Emergency Service and proceed to the assembly point with the manifest. Wardens will ensure that all staff have evacuated their respective areas quickly and safely, then proceed to the assembly point and all wardens follows the procedure as per procedure ERP-02 Loss of Containment in Emergency Response Plan.

Date of Revision 01- 29/01/2026