

## POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN REV 9 – JANUARY 2025

Approved by: Jack Bosenberg – Operations Leader      Date: 10 January 2025

### PURPOSE:

Lubrizol International Inc. Holds an Environmental Protection Licence with the NSW Environmental Protection Authority (EPA) for the manufacturing petroleum products and chemical storage within its site. 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 (PRIMP) 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 during an activity so that material harm to the environment (within the meaning of section 147 of POEO Act) is caused or threatened, the person carrying on the activity must immediately implement this plan in relation to the activity by Part 5.7A of the POEO Act. A written copy of this plan must be kept at the reception of Lubrizol's site and be made available on request by an authorized NSW 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's no website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that required to be publicly available are set out in clause 98D of the *Protection of the Environment Operations (General) Regulation 2009*.

NOTE: This plan has been developed in accordance with the Protection of the *Environment Operations Act 1997* and the *Protection of the Environment (General) Regulation 2009*

### Environment Protection Licence (EPL) Details

Name of licensee: Lubrizol International Inc.  
(including ABN) 52 073 495 603

EPL Number: Licence 134

Premises name Lubrizol Australia  
and address: 28 River St. Silverwater NSW 2128

Company or business contact details:

Name: Jack Bosenberg

Position or title: Operations Leader

Contact numbers: 0418 860 899

Email: Jack.Bosenberg@Lubrizol.com

Website address: [Specialty Chemicals - The Lubrizol Corporation](#)

Scheduled activity/activities on EPL: N/A

Fee based activity/activities on EPL: Other activities

### Pollution Incident – Person/s Responsible

Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s should the primary contact be unavailable.

#### PIRMP activation

	Primary Contact	Alternative Contact
Name of person responsible:	Jack Bosenberg	Quoc (Kevin) Nguyen
Position or title:	Operations Leader	Operations Engineer
Contact numbers:	0418 860 899	0482 707 168
Email:	<a href="mailto:Jack.Bosenberg@Lubrizol.com">Jack.Bosenberg@Lubrizol.com</a>	<a href="mailto:Quoc.Nguyen@Lubrizol.com">Quoc.Nguyen@Lubrizol.com</a>

#### Notifying relevant authorities

Notification should be made by a person with an appropriate level of authority within the company

Name of person responsible:	Jack Bosenberg
Position or title:	Operations Leader
Contact numbers:	0418 860 899
Email:	<a href="mailto:Jack.Bosenberg@Lubrizol.com">Jack.Bosenberg@Lubrizol.com</a>

Managing response to pollution incident

Name of person responsible:	Quoc (Kevin) Nguyen
Position or title:	Operations Engineer
Contact numbers:	0482 707 168
Email:	<a href="mailto:Quoc.Nguyen@Lubrizol.com">Quoc.Nguyen@Lubrizol.com</a>

### Notification of Relevant Authorities

Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in case of a pollution incident that causes or threatens to cause material harm to the environment. Relevant authorities include:

Fire & Rescue NSW

Contact number: 000 (24 hours)

Environment Protection Authority

Contact number: Environmental Hotline 131 555 (24 hours)

Healthcare

Contact number: 1800 022 222

SafeWork NSW

Contact number: 131050

Paramatta Council

Contact number: 1300 617 058

Any other identified organization or agency requiring notification

Contact number: N/A

### Notification of Neighbours and the Local Community

Identify owners or occupiers of premises in the vicinity of the licenced premises

- |                                                                                                                           |                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Service NSW</li><li>• United Flashing</li><li>• Ausgrid Learning Centre</li></ul> | <ul style="list-style-type: none"><li>• Mills Industrial Brokers</li><li>• Optical Solutions Australia</li></ul> |
|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|

Notification to the neighbouring public will be by:

Door knocking	Letterbox drop
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Erection of warning signs

Information to be communicated

Inform neighbours and people near the incident, the practical things they can do to minimize the risk of harm to their health and property, during and after the incident. This includes:

- Advise neighbours and people near the incident to avoid using water in Paramatta river or groundwater likely to be affected by a pollutant discharge.
- Lubrizol will advise neighbours and people near the incident when the incident has been completed.

### Description and Likelihood of Hazards

As defined by the terms of the Environmental Protection Licence 134, the hazards and risks associated with the activity is considered HIGH – and would extend to a chemical spill – potentially caused by:

- |                                                                                |                                                                                         |
|--------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Tank/storage failure</li></ul>         | <ul style="list-style-type: none"><li>• Bund failure</li></ul>                          |
| <ul style="list-style-type: none"><li>• Delivery or vehicle incident</li></ul> | <ul style="list-style-type: none"><li>• Malfunctioning of valves on equipment</li></ul> |
| <ul style="list-style-type: none"><li>• Damage to chemical storage</li></ul>   | <ul style="list-style-type: none"><li>• </li></ul>                                      |

The likelihood of a chemical spill is considered POSSIBLE, and the following events could increase the likelihood:

- Bund failure – bunding unable to hold the petroleum additives
- Vehicle incident – Accident in vehicle carrying petroleum additives, releasing it into drains/waterways
- Inappropriate storage of additives – non bunded
- Inappropriate manufacturing process – i.e.. Petroleum additives not registered for waterways
- Release storm water that contained petroleum product into river without appropriate monitoring

Pre-emptive Actions to be Taken		
Pre-emptive actions to be taken to minimize or prevent harm to human health or the environment:		
<ul style="list-style-type: none"><li>• Bunding of petroleum additives where they are being stored</li><li>• Ensuring operators follow the procedures, work method statements, and risk assessments through adequate training</li><li>• Ensure materials and equipment brought onto the site by contractors are in working order and fit for purpose</li><li>• Appropriate and regularly maintained safety equipment and personnel protective equipment</li><li>• Only allow appropriately trained and qualified people to operate the boilers</li></ul>		
Inventory of Pollutants – Petroleum additives and Raw Materials		
Location	Maximum Quantity (KG)	Contents
Top warehouse	280,000	Hydrocarbon
Tank farm	7,217,000	Hydrocarbon
Blending area	60,000	Hydrocarbon
Bottom warehouse	1,264,000	Hydrocarbon
Safety Equipment		
Up-to-date Safety Data Sheets	Use of the correct PPE for handling petroleum additives	
Available spill kits and spill bins	Eyewash & shower stations throughout the site	
First aid kits	Bunded areas for storage of petroleum additives and raw materials	
Appropriate firefighting equipment for use when there is a fire		
Minimising Harm to Persons on the Premises		
In the event of a spill, obtain advice from the Operations Leader on environmental impacts at the incident site by calling on 741 5206		
Ensure persons on site have appropriate PPE while working to contain the spill, to minimize the harm to themselves.		
Ensure adequate signage is installed advising not to swim, drink or use the water in creeks, rivers or groundwater.		
Actions to be Taken During or Immediately After a Pollution Incident		
Step 1: Ensure personnel are safe		
<ul style="list-style-type: none"><li>• Make sure people are safe – call 000 if needed</li></ul>		
Step 2: Stop the spill where possible		
<ul style="list-style-type: none"><li>• If it is safe to do so, stop the spill at its source.</li><li>• For instance, set right a tipped drum, plug the hole or turn off valves, hoses, pumps, or compressors.</li></ul>		

**Step 3: Contain the spill where possible.**

- Small spills – Using spill kit (follow spill response procedure in kit), contain the spill and block drains to prevent movement of spill into waterways.

To contain a spill, distribute spill control and absorbent materials around and over the entire spill area, working from the outside and circling to the inside.

- Large spills – Prevent spill from entering drains and waterways – Call Hazmat on 000

**Step 4: Notify the appropriate Coordinator responsible for the works**

- Call the Operations Leader or the Operations Engineer on Mob 0418 860 899 or 0482 707 168 to coordinate the Pollution Incident Response Management Plan in the event of a pollution incident

**Step 5: Report Incident**

Report the incident by filling out an Incident Report

The time, date, nature, duration and location of the incident,

The location of the place where pollution is occurring or is likely to occur,

The nature, the estimated quantity or volume and the concentration of any pollutants involved,

The circumstances in which the incident occurred (including the cause of the incident, if known),

The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution

Report details to Operations Leader on 0418 860 899 who will notify the relevant Authorities in the event of a pollution incident - ASAP

**Step 6: Coordinator to ensure relevant procedures are completed as required**

- Clean up – For small spills follow spill response procedure in spill kit, large spills follow Hazmat instructions
- Ensure that used absorbent materials and other equipment used to clean up spills are disposed of in general waste bin. Used absorbent materials that drip or leak liquids, or contain hazardous materials, cannot be placed in general waste bin.
- Follow up on incident investigation and reporting of incident through QHSES tracking system

**Coordinating with Persons**

Initial first contact with authorities

Accept advise from relevant Authority in action to remediate the incident

Once remediation action is completed, the site will be handed over from that Authority

Follow up remediation by Lubrizol will complete the site from the incident

<i>Identify the person/s through whom all communications are to be made:</i>	Primary Contact	Alternative Contact
Name of person responsible:	Jack Bosenberg	Quoc (Kevin) Nguyen
Position or title:	Operations Leader	Operations Engineer

Contact numbers:	0418 860 899	0482 707 168
Email:	<a href="mailto:Jack.Bosenberg@Lubrizol.com">Jack.Bosenberg@Lubrizol.com</a>	<a href="mailto:Quoc.Nguyen@Lubrizol.com">Quoc.Nguyen@Lubrizol.com</a>
<b>Staff Training</b>		
Training Type	Objectives of Training	
Toolbox Meetings – PRIMP training – with each new PRIMP update	Provide an understanding to all relevant staff of the requirements of the plan	
Field exercises – At least once a year for Operations team handling petroleum additives near or on waterways – in the form of spill drill or similar.	Maintain understanding and provide opportunity to practice implementing the plans. Monitor emergency preparedness and response	
Spill kit training and emergency response training	Ensure Operations team is confident in responding to petroleum additive spills.	

## Respond immediately to liquid spills

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**Stop**  
the spill



**Contain**  
the spill



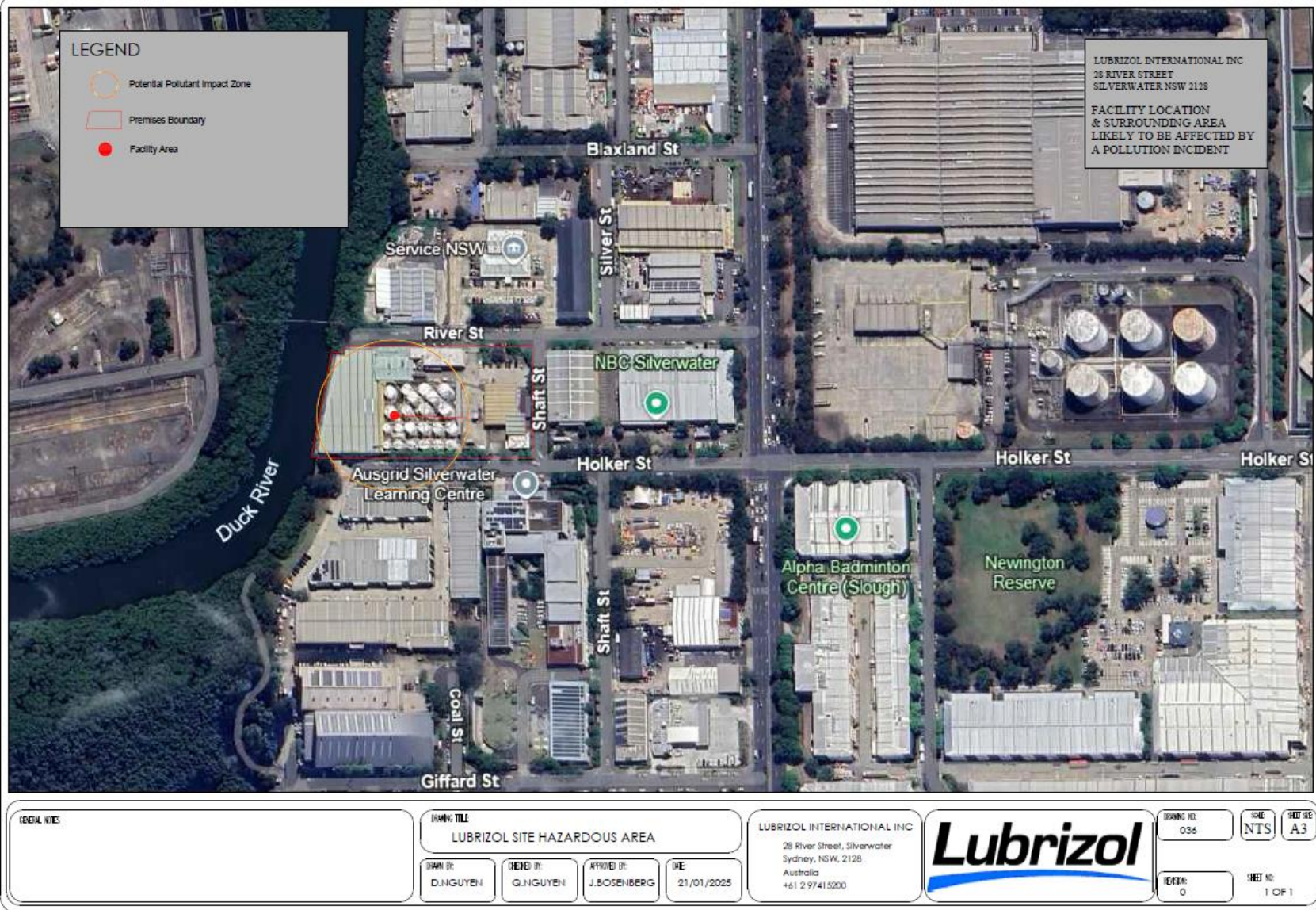
**Report**  
the spill



**Clean up**  
the spill



MAP



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**Lubrizol International Inc.**

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## Controlled Document Information

### Authorisation Details

Audience:	City Wide
Department:	Operations
Officer	Quoc (Kevin) Nguyen
Review Timeframe	1 Year
Next Scheduled Review Date:	14 January 2026
Authorisation:	Operations Leader – Jack Bosenberg

### Related Document Information, Standards & References

<b>Related Legislation</b>	Work Health and Safety Act 2011	Protect and prevent workplace incident
<b>Related Policies (Council &amp; Internal)</b>	Nil	
<b>Related Procedures, Guidelines, Forms, WHS Modules/PCD's, Risk Assessments, Work Method Statements:</b>	Environmental Protection Licence 134 – Lubrizol International Inc.	
<b>Standard COP's &amp; Other References</b>	Nil	

## Definitions

Term / Abbreviation	Definition
EPA	Environment Protection Authority
EPL	Environment Protection Licence
Notifiable Incident	A pollution incident causing or threatening material harm (actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or results in actual or potential loss or property damage of an amount, exceeding \$10,000)
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
Pollution Incident	Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is 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.
Relevant Authority	Environmental Protection Authority, NSW Health (Public Health Unit), Work Cover, Parramatta City Council and Fire and Rescue NSW
SDS	Safety Data Sheets

## Version History

Version No	Date Changed	Modified By	Details and Comments
1	03/07/2012	Joe Mancini	New Pollution Incident Response Management Plan as per POEO Act
2	03/04/2014	Joe Mancini	Revised contacts as per new Org Chart
3	15/09/2014	Joe Mancini	Added contact number for Auburn Council P7 and Shell emergency number on page P4
4	02/08/2016	Joe Mancini	Updated emergency contacts and removed GM from documentation
5	02/10/2017	Paul Grima	Updated emergency contacts and team lists, transition for ISO 9001 & 14001:2015 requirements
6	02/11/2018	Paul Grima	Remove barge requirements
7	04/06/2020	Paul Grima	Updated emergency contacts and team lists,

			Transition for ISO 45001:2015 requirements
8	09/09/2022	Kevin Nguyen	Updated emergency contacts and team lists
9	13/01/2025	Kevin Nguyen	Updated the layout and the content of the PIRMP