Galserv®

Pollution Incident Response Management Plan (PIRMP)

Galvanising Services Pty Ltd

EPA Licence 142.

Contents

1.0 Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the Protection of the Environment Operations Act 1997 (POEO Act) and associated Protection of the Environment Legislation Amendment Act 2011 (POELA Act) for licensed facilities.

Under Nepean Building and Infrastructures' Emergency Management System, detailed emergency response procedure is already in place for the classification and management of incidents, across sites. Under the provisions of Part 3A 98B(2) of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, to allow for the integration of requirements into existing plans in respect to pollution incident response, requirements under POEO legislation have been integrated into these existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans and associated procedure. It also details additional supplementary site-specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

2.0 Environmental Protection Licence (EPL) Details

Name of licensee: (including ABN)	Galvanising Services Pty Ltd 11 000 296 631
EPL number:	142
Premises name and address:	Nepean Building and Infrastructure Pty Ltd 135 Rookwood Rd Yagoona NSW, 2199
Company or business contact details	**Name:** Joshua Nolan **Position or title:** General Manager **Contact number/s:** 0408 808 595 **Email:** joshua.nolan@nepean.com
Website address:	www.nepean.com
Scheduled activity/activities on EPL:	Metallurgical activities
Fee-based activity/activities on EPL:	0-100,000 T annual capacity to coat metal

* Listed in the EPA Public Register

3.0 Legislative Requirements

Specific legislative requirements for the development and implementation of this PIRMP are provided below.

- Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act)
- Part 5.7A of the Protection of the Environment Legislation Amendment Act 2011 (POELA Act)
- The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans)

- Regulation 2012 Environment Protection License (EPL) 142.

4.0 Definitions

A pollution incident means an incident or set of circumstances during or as a consequence of which there 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. It includes an incident or set of circumstances in which a substance has been placed or disposed of on a premises, but it does not include an incident or set of circumstances involving only the emission of any noise

Abbreviation	Explanation
EPA	Environment Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
POELA Act	Protection of the Environment Legislation Amendment Act 2011
CLM Act	Contaminated Land Management Act 1997
EPL	Environment Protection License
ERP	Emergency Response Plan
EMS	Environmental Management System

5.0 Roles and responsibilities

Role	***Responsibility***
Worker	It is the responsibility of all workers (including subcontractors), immediately after the person becomes aware of the pollution incident to notify direct supervisor/line manager and commence chemical clean up procedures (if safe to do so)
Line Manager/Supervisor	It is the responsibility of the Line Manager/Supervisor to determine the requirement and extent of community notification for potential incidents
HSEQ	Manager/HSEQ has the authority to authorise the dissemination of information to stakeholders, following approval of an Executive Team Member, via the means of telephone calls, electronic mails, HSEQ alerts. Where notified of a pollution incident, it is the duty of Management/HSEQ to notify each relevant authority of the incident and all relevant information about it.
General Manager	The General Manager has the responsibility of ensuring the identification and mitigation of risks specific to their business units are being undertaken and appropriately documented and external notifications are completed within designated timeframes as required.

6.0 Risk Identification

6.1 Potential hazards

Workers and others may be exposed to a range of hazards or risks in the course of their daily work activities, the risks from these work activities are identified and assessed and if assessed as unsafe must be eliminated or minimised so far reasonably practicable. A risk assessment is used in the identification and assessment of the hazards or risks to safety, health and environment in the workplace; and development of options implementing the best methods of controlling and eliminating these risks, the process is outlined as below.

To effectively plan for a potential pollution event, a register of environmental hazards has been created. Each hazard has been assessed in accordance with NEPEAN Building and Infrastructure Risk Assessment tool (see Table 1 below). The hazards have been grouped according to the area of environmental impact. By identifying these hazards ahead of time, mitigation measures can be identified and implemented through site procedures to minimise the risk of a pollution event occurring. These have been listed in table 2 below.

Major Hazards	Increases to Likelihood of occurrence	Pre-emptive action
Fire	• Hot works activities • Storage of compressed/flammable gases	• Designated areas for hot works • Containment barriers •
Escape, spillage, or leakage of hazardous substances	Onsite tank chemical replenishment	• Storm water valve close off to prevent discharge on contain on site • Overflow bund area with alarm and lighting, linked to alarm system if no-one on site • 'Polymer coating inside pre-treatment tank and underground bunding of pre-treatment tanks • 'Storm water monitoring testing by external company with regular monitoring and review of data • Drivers and staff trained in spill management and containment
Leak/spillage of contaminated storm water	Periods of very high rainfall	• Monitoring of stormwater contamination • Catchment drains
Excessive/harmful air emissions (dust, smoke, fume)	Faulty plant or equipment	• Fan Extraction & Filtration System • Baghouse

Spill on site from visiting vehicles	• Unsafe driving • Unmaintained vehicles	• Spill kits • First Aid kits • Designated loading and unloading points
Utility or service rupture	• Strike by mechanical means • Inadequate control measures	• Emergency shutoff valve

6.2 Pollutant Inventory

Nepean Building and infrastructure receipts, stores, handles many hazardous chemicals, fuels, oils and additives, and has a comprehensive system for safe handling of such materials. The site uses this system that includes amongst others,

- Dangerous Goods and Hazardous Substances Manifest and Notification
- Procedure Safety Data Sheets
- procedures for the approval of new chemicals on site
- procedures for safe storage, use and disposal of these materials

In addition, to meet the requirements of Acts other than the environmental legislation, updates of the Dangerous Goods and Hazardous Substance Manifest and List are undertaken and provided to NSW SafeWork Authority and kept on site.

Potential pollutants	Max Qty on site	Storage	Storage location
Hydrochloric Acid	300,000L	Inground Tank	Tanks 2-6
Hydrochloric Acid	2,000L	1000L IBC	Chemical Storage Shed
Sodium Dichromate	48,000L	Inground Tank	Tank Loc E
Sodium Dichromate	100 kg	25 kg Bags	Chemical Storage Shed
Sodium hydroxide (Caustic Soda)	50,000L	Inground Tank	1
Sodium hydroxide (Caustic Soda)	3,000kg	25kg Bags	Chemical Storage Shed
Zinc Ammonium Chloride	40,000L	Inground Tank	Tank 7
Zinc Ammonium Chloride	2,000kg	25 kg bags	Chemical Storage Shed
Ammonium Chloride	1,000 kg	25 kg bags	A
Ammonium Aqueous	2,000L	1000L IBC	Chemical Storage Shed
Zinc	112 tons	1.12 ton blocks	Undercover storage
Nickel Powder	2,000 kgs	250 kg Drums	Middle Bay East
Argon	136m³	9.7m³ Gas Cylinders	Gas Cages
Diesel	60L	Jerry Cans	Maintenance Workshop
LPG	1,470L	15kg (29.4L) Gas Cylinder	Gas Cages
Acetylene	1,008m³	7m³	Gas Cages

6.3 Minimizing Harm to persons on the premises

A **24-hours Emergency Hotline** is shown on signage at the entrance to the premises and displayed on the company webpage. These numbers may be contacted should there be a safety or environmental incident on the premises.

Emergency Phone: **Operating Hours Phone:** 02 9707 5000

6.4 Safety Equipment

Legislative requirements under the Protection of the Environment Operations (POEO) Act dictate that the site is to provide information for all pollutants that are used and stored on the site. This information is required as it assists personnel responsible for coordinating spill responses to manage environmental incidents more effectively.

Equipment kept on site includes but not limited to safety showers, eye wash, first aid stations, spill kits etc.

Where PPE is required to complete a task or within a certain area it is listed within specific work instructions. All Safety data sheets are kept in various locations around the site and stored within the storage area of the chemical.

7.0 Incident Response

7.1 Activate site emergency plan

Following are examples of environmental emergencies:

- Fire – Infrastructure, vehicles, hydraulic systems
- Acid/alkali spills – potential discharge to storm water drains
- Molten metal explosion/spill
- Hazardous airborne emissions
- Flammable gas fire/explosion

7.2 Procedural Implementation

Safety	• Care for workers - Evacuate Area, • Care for the Environment – e.g. Contain spills, put out fires; ONLY if safe to do so	
Treatment	**Provide First Aid or Medical Treatment, if required and safe to do so**	
Dr: Corporate Medical Consultants **Dr Tony Antoun**	**Phone: 02 8323 6222**	**Dr Address:** Suite 2, Level 1, 402-410 Chapel Rd, BANKSTOWN NSW 2200

Ambulance:	**000 (triple zero)**	
Hospital: **Bankstown/Lidcombe Hospital**	Phone: (02) 9881 8000	Hospital Address: Bankstown-Lidcombe Hospital Eldridge Road BANKSTOWN NSW 2200

Minor Spills

- Identify the substance causing the emission if it can be safely identified and refer to the SDS for information regarding first aid instructions, advice on appropriate Personal Protection Equipment that may be required. Contain the spill (Spill Kits) and control its flow from the site.
- If it is not safe or the substance cannot be identified, contact the Fire Brigade on "000". Clear the area of all personnel and shut down all plant if required.
- Report the spill to the General Manager or Senior Management representative on site, if pollution has escaped the site or if the spill has potential to harm the environment.
- Report any pollution incident no matter how small, to your direct supervisor

Major Spills

- For large-scale hazardous spills call NSW Fire and Rescue immediately on 000 zero.
- Identify the substance causing the emission, if it can be safely identified refer to the SDS for information regarding first aid instructions, advice on appropriate Personal Protection Equipment (PPE) that may be required and contain the spill (Spill Kits) and control its flow from the site if safe to do so
- Report the spill to the General Manager or Senior Management representative on site, if pollution has escaped the site or if the spill has potential to harm the environment
- Call Transpacific Industries (TPI) with details of spill so their emergency response crews can assist. **1800 774 557 (24hr Emergency Response Hotline)**
- Call Key People listed below in order

Uncontrolled Gas release

- **Do not** activate the building alarms – pass the alarm by word of mouth or send someone for help.
- Ensure the immediate safety of anyone within the vicinity of the contaminated area.
- Evacuate the immediate area around the leak, avoiding the area of contamination as best as possible and close doors.
- If safe to do so, turn off the ventilation, machinery and ensure that naked flames are extinguished and check that the nearest gas isolator switch is off.
- **Do not** switch any electrical equipment (including light switches) ON or OFF, as these may spark and become an ignition source.
- After you have evacuated the area, in a safe area away from the source, call **000**, if the release remains uncontrolled or if medical assistance is required.
  If it is necessary to use a mobile phone, move several metres away from the immediate area before using the mobile phone - if you haven't already done so.
- Tell Emergency services you have a "gas leak" giving exact location and type of material involved and if it is contained and isolated.
- Follow internal procedures after activating the above.
- Anyone who has been exposed must, if safe to do so, be moved to a safe decontamination area. The treatment of serious injury must take precedence over decontamination and containment.

8.0 Notification and reporting

8.1 External reporting

8.1.1 What must be notified

Notification of pollution incidents to authorities require verbal notification, and where requested to do so, followed by a written notification under section 148 and 150 of the POEO Act. The relevant information to be provided should consist of the following.

-
- 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, if known,
- 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, if known,
- other information prescribed by the regulations.

8.1.2 What must be notified

A pollution incident is required to be notified immediately if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

(a) 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

(b) 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.

8.2 Internal Reporting

PIRMP activation	**Name of person responsible:** Shift Supervisors **Position or title:** **Business hours contact number/s:** 02 9707 5000 **Email:** service.galserv@nepean.com		
Internal Notifications	**Name**	**Position**	**Phone**
	Isaac Penny	Operations Manager - Galserv	0437 385 662
	Joshua Nolan	General Manager - Galserv	0408 808 595
	Faraz Alam	Process Engineer – Chemicals & Projects	0427 466 811
	Tony Combe	Managing Director	0409 200 239
Notifying relevant external authorities Notification should be made by a person with an appropriate level of authority within the company.	**Name of person responsible:** Joshua Nolan **Position or title**: General Manager **Business hours contact number/s:** 0408 808 595 **Email:** Joshua.nolan@nepean.com		
Managing response to pollution incident	As per Internal notification responsibilities above		

Notification of neighbouring facilities	As per Internal notification responsibilities above

8.3 Notification of neighbours and local community

Communication mechanisms will be used where neighbours and/or the local community may be affected by the incident, including but not limited to:

- Website
- telephone notification and/or emails
- signage
- letterbox drops
- door knocking

Neighbouring Properties

	Company	Address	Contact No.
1	BP Petrol Station Potts Hill	155 – 157 Rookwood Road Yagoona NSW 2199	Ph 9790 5377
2	Container Depot	Rookwood Road Yagoona NSW 2199	Ph 9793 7874
3	Construction Site	15 Muir Road Chullora NSW 2199	TBA
4	Toll SPD	10 Brunker Rd, Chullora, NSW 2190	(02) 8713 7200

9.0 Maps

Detailed maps (Appendix C) showing the:

- location of the premises to which the licence relates
- surrounding area likely to be affected by a pollution incident
- Neighbouring properties
- location of potential pollutants and storm water drains on the premises

It is also recommended the position of any discharge points, or any other useful information be included on the map/s, and that any important details on the map are labelled (e.g. the nearest water course or water body that stormwater drains located on the premises discharge to).

10.0 Training

Training and Awareness sessions will be held with key stakeholders upon revision of the PIRMP. All new employees receive a structured information package which includes safety, environmental and Quality policies, and procedures in their induction program. All training records are held with each business unit.

Contractors will be made aware of the PIRMP requirements via Conditions of Entry for working on site. Records are held with Maintenance

Recorded toolbox training sessions are conducted daily or as needed to cover any safety, environmental or quality incidents which may have occurred over the last 24 hours.

Environmental work instructions must be communicated to all employees so that employees understand relevant environmental management procedures relevant to their work areas.

11.0 Testing and Review

Nepean Building & Infrastructure will test the plan a minimum of every 12 months by assessing and reviewing and making any necessary changes following the assessment. The PIRMP plan will be reviewed within 1 month of an incident occurring and/or test. The PIRMP has been tested on the following dates.

11.1 Record of revision

Test Date	Version Date	Version	Details of changes	Reviewed by	Approved by
	22/08/2017	A	New document	Melissa Flannery	Joshua Nolan
	28/10/2017	B	Management Action plan added	Melissa Flannery	Joshua Nolan
22/08/2018	24/08/2018	C	Update site maps	Melissa Flannery	Joshua Nolan
17/12/2019	07/01/2020	D	Include site manifest	Melissa Flannery	Joshua Nolan
	20/01/2020	E	Update test dates	Melissa Flannery	Joshua Nolan
20/10/2020	27/10/2020	F	Update test dates	Melissa Flannery	Faraz Alam
24/09/2021	28/09/2021	G	Update format, include compliance obligations and include test dates	Melissa Flannery	Faraz Alam
15/09/2022	23/09/2022	H	Update to test date, scenario details, contacts and chemical	Melissa Flannery	Faraz Alam/Joshua Nolan
23/11/2023	01/12/2023	I	Update of test date, scenario detail	Melissa Flannery	Faraz Alam & Joshua Nolan

11.2 Details of previous PIRMP Test

Date of last test	23/11/2023
Tested by	Faraz Alam
Details of test	**Simulated Scenario** During the routine replenishment of the quench tank with sodium dichromate powder, a spill occurs due to mishandling of the chemical. The spill can pose safety hazards to personnel and environmental risks if not managed promptly and effectively.
Testing findings, including issues identified	During a simulated drill, an unexpected sodium dichromate powder spill near a chemical shed was replicated using a sandbag. The drill initially involved the forklift driver, assessing their response to the spill, and swiftly engaged a designated response team, including safety officers, environmental experts, and trained chemical spill responders. After assessing the spill, the driver contacted the site chemical engineer for guidance, acquired proper Personal Protective Equipment (PPE), and contained the spill with available kit resources. However, a deviation from protocol prompted the intervention of a supervisor skilled in spill management, who oversaw the cleanup process and involved a response team comprising the site chemical engineer and operations manager. Post-drill evaluations aimed to assess effectiveness, identify improvements, and enhance safety protocols and readiness. The simulation allowed assessment of response protocols and personnel reactions, testing individual response and coordinated team efforts toward refining protocols and bolstering preparedness for future spill incidents. Properly managing sodium dichromate requires clear procedures, currently lacking clarification. Spill kits lack crucial components like absorbents, cordoning tape, and spare traffic cones, diminishing their effectiveness. Uncertainty persists regarding the availability and specifications of Personal Protective Equipment (PPE) tailored for sodium dichromate handling. Spill kits being review to ensure correct materials for hazards on site. The absence knowing where Safety Data Sheets (SDS) are kept and in spill kits has created a knowledge gap within response teams. Personnel handling chemicals lack comprehensive hazard recognition and risk assessment training. Measures are needed to address wind dispersion during powder spills. Additionally, uncertainty regarding the usage and disposal protocol of P3 masks for sodium dichromate handling, whether disposable or reusable masks should be disposed of post-handling.
Next scheduled test	May-24

11.3 Control of documentation and records

All documents and records and kept and maintained within the Nepean Business System which comprises of 14001:2015 Environmental, 9001:2015 Quality and 45001:2018 Safety Standards. A copy of the PIRMP is also displayed company webpage. All records are kept electronically indefinitely within the companies document control software and backed up to the cloud.

The following documents/references have been used to assist in the preparation of this PIRMP

- Emergency Control Procedure
- Dangerous Goods Manifest
- Dangerous Goods and Hazardous Chemical Register & Manifest
- Emergency Procedure Flipchart
- Emergency Site Diagram
- Storm Water Management Plan
- Protection of the Environment Operations (General) Regulation 2009

12.0 Publishing of monitoring results

By section 66(6) of the POEO Act, licensees are required to publish pollution monitoring data that has been collected as result of licence conditions. This section stipulates the following:

- Licensees who undertake monitoring because of a licence condition must publish or make available pollution monitoring data within 14 days of obtaining the data and/or receiving a specific request for a copy of the data
- Licensees who maintain a website must make the monitoring data related to pollution available in a prominent position on their website
- Licensees who do not maintain a website must provide a free of charge copy of the pollution monitoring data on reasonable written request from any person
- The data must be published in accordance with requirements issued in writing by the EPA and this document constitutes those requirements. For the purposes of these requirements, the timeframe for publishing or providing data is 14 working days.

Appendix A - Relevant compliance requirements

Environment Operations Act 1997 Section of Act	PIRMP Section Reference	How NEPEAN Complies
153A	Purpose	NEPEAN/Galserv have an EPL and have a PRIMP incorporated in their incident and Emergency Response documentation
153C	Notification responsibilities Emergency Response Plan Contact Details of relevant authorities to be notified of pollution event External contact information Internal contact information Neighbourhood contact list	As per the information provided in section 8 each licences sites emergency document stipulates how this requirement is met.
153D	Availability of plans	Noted, the relevant incident and emergency response documentation per site or activity are kept at the Premises or with the NEPEAN personnel performing the pertaining work.
153E	Testing of plans	Annual emergency drills are undertaken where the incident and emergency documentation, which incorporate the PIRMP, are tested for currency and adequacy
153F	Notification responsibilities	This PIRMP manual and supporting site specific Incident and Emergency documentation provide NEPEAN personnel with the relevant guidance with which to implement the PIRMP.

POEO (General) Regulation 2009 Section of Act	PIRMP Section Reference	How NEPEAN Complies
98C (1) (a-b)	Description of environmental hazards	NEPEAN/Galserv has a site-specific risk register which contains: • Identified significant environmental aspects and impacts • Potential hazard and impacts • Inherent (before taking existing controls into account) risk level for each impact • Hierarchy of controls to be implemented • Residual (after taking existing controls into account) risk level for each impact Where high or extreme residual risks have been identified on site, these have been signed appropriate controls as detailed in the register. Should any other such risk be identified they will be escalated to the attention of the site (and management)

		and dealt with in accordance with NEPEAN Risk Management protocols.
98C (1) (c)	Comprehensive Emergency response plan	Pre-emptive actions are detailed in site specific risk registers and are referred to as Controls, with appropriate supporting procedures referenced in site specific Operational/Site Management Plans.
98C (1) (d & e)	Inventory of pollutants	A full list of the bulk chemicals, their storage quantities and locations are detailed in site specific Hazardous Substances and Dangerous Goods registers
98C (1) (f)	Comprehensive Emergency response plan/safety equipment	NEPEAN/Galserv is equipped with safety devices such as safety showers, chemical decontamination kits, breathing equipment, first aid stations, spill kits, etc. Where additional PPE is required (e.g. chemical suits) the requirements are spelled out in the relevant task-specific work instructions. Safety Data Sheets are located as appropriate on sites near the chemical they apply to
98C (1) (g & h)	Internal contact information	The names, position titles and 24-hour contact details of key individuals who are responsible for activating the Incident and Emergency Response documentation and managing the responses are detailed within such plans/procedures. The contact details of relevant authorities such as the EPA, the local council, fire and emergency services, as well as other relevant regulatory authorities are also contained in the documentation, in addition to this Manual.
98C (1) (i)	Community	The mechanisms that will be used for providing early warnings and regular updates to the owners and occupiers of premises who may be affected by a pollution incident occurring on site are detailed in this Manual.
98C (1) (j)	Notification of employees and other site personnel	To minimise the risk of harm to any persons who may be on the premises should an incident occur several incident response procedures have been developed. The response procedures detailed in the site-specific Incident and Emergency documentation, and include (but not limited to) potential emergencies and incidents such as: • Fire • Chemical or Pollutant Spills • Medical Emergencies • Rescue Situations • Bomb/Phone Threats
98C (1) (k)	Diagrams/Maps	A set of maps and diagrams have been prepared and are appended to the specific Incident and Emergency Response documentation. The following typical details are included: • The location of the premises and the surrounding area that is likely to be affected by a pollution incident. • The location of potential pollutants on the premises

98C (1) (l)	Comprehensive Emergency response plan	The site-specific Incident and Emergency Response documentation include detailed descriptions of the actions that will be taken immediately after a pollution incident to reduce or control any pollution. In addition, detailed chemical and hazardous material management procedures have been developed. The procedures include spill/emissions response and clean up/remediation instructions. Further information regarding the site's readiness for incidents and emergencies can be found in the site-specific Incident and Emergency Response documentation, including the notification requirements, in addition to this Manual
98C (1) (m)	Staff training	All relevant workers are trained in Incident and Emergency management. The training consists of two major components: • Theoretical module – ERP training • Practical component – participation in both desktop and incident and emergency scenario simulation drills. Training records are to be maintained within the training databases

. **Appendix B – Risk Matrix**

		Consequence				
		Low	Minor	Moderate	Major	Extreme
		1	2	3	4	5
People		Injuries or ailments requiring First Aid or no medical treatment.	Medical Treatment Injury. Injury requiring treatment or investigation or tests by a medical practitioner	Lost Time Injury with less than 5 days lost time Serious life-threatening injury	Serious Lost Time Injury Serious life-threatening injury causing hospitalisation or multiple medical treatment cases	Fatality or multiple life-threatening injuries.
Environment		No lasting effect. Low level impacts on biological or physical environment. Limited damage to minimal area of low significance	Minor effects on biological or physical environment. Minor short-medium term damage to small area of limited significance	Moderate effects on biological or physical environment but not affecting the ecosystem function. Moderate short to medium term impacts.	Serious environmental effects with some impairment to the ecosystem with medium to long term impacts	Long term, widespread effects on the environment
Legal		Breach of local standard operating procedures but not of any mandatory policies or procedures.	Ad hoc, as opposed to systemic, breaches of policies and procedures but not of laws or regulations.	Breach of any laws/licenses, including a notifiable breach resulting in recommendations and active monitoring by regulator/s; Instances of breach of Operational policies	Prosecution. Fines s$1M. Show cause notice from regulator. Enforceable undertaking. Significant and systemic breach of policies.	Prosecution with potential for executives to be jailed fines >$1M. Loss of critical licence/accreditation. Significant and systemic breach of Governance policies.
Reputation		Internal Review	Scrutiny required by internal committees or internal audit to prevent escalation.	Scrutiny required by external committees or ACT Auditor General's Office, or inquest, etc.	Intense public, political and media scrutiny. E.g.: front page headlines, TV, etc.	Assembly inquiry or Commission of inquiry or adverse national media.
Business Process & Systems		Minor errors in systems or processes requiring corrective action, or minor delay without impact on overall schedule.	Policy procedural rule occasionally not met, or services do not fully meet needs.	One or more key accountability requirements not met. Inconvenient but not client welfare threatening.	Strategies not consistent with Nepean's agenda. Data supported trends show service is degraded.	Critical system failure, bad policy advice or ongoing non-compliance. Business severely affected.
Financial		1% of Budget or <$5K	2.5% of Budget or <$50K	> 5% of Budget or <$500K	> 10% of Budget or <$5M	>25% of Budget or >$5M
Manufacturing and Design		No Effect to the Operation of the Business (Typically Ex Stock Standard Products)	Impact Minimal with some bespoke fabrication (i.e. Standard Handrail Prefab and Grating Fab)	Increase costs likely to comply with requirements (Can be catered for with vigilance)	Moderate Strain to the operations (Outside current capabilities or capacity)	Significant strain to the operations due to system failure
Information Security		Short Term <1hour loss of productivity Malware attack	<4 hours loss productivity to one system Identity Theft	>24hours disruption to more than 1 system	Loss of Data from primary storage location >48hours disruption to more than one system	Loss of all data on main drives and backups

The likelihood is the probability of an incident occurring in the number of times an action is performed. i.e. 1 incident in every 10 actions is almost certain to have occurred					Consequence				
					Low	Minor	Moderate	Major	Extreme
Probability:					1	2	3	4	5
Likelihood ↑	>1 in 10	Is expected to occur in most circumstances	5	Almost Certain	M (11)	H (16)	H (20)	E (23)	E (25)
	>1 in 100	Will probably occur	4	Likely	M (7)	M (12)	H (17)	H (21)	E (24)
	>1 in 1000	Might occur at some time in the future	3	Possible	L (4)	M (8)	M (13)	H (18)	E (22)
	>1 in 10,000	Could occur but doubtful	2	Unlikely	L (2)	L (5)	M (9)	H (14)	H (19)
↑	>1 in 100,000	May occur but only in exceptional circumstances	1	Rare	L (1)	L (3)	M (6)	M (10)	H (15)

- **Appendix C – Neighbouring properties**

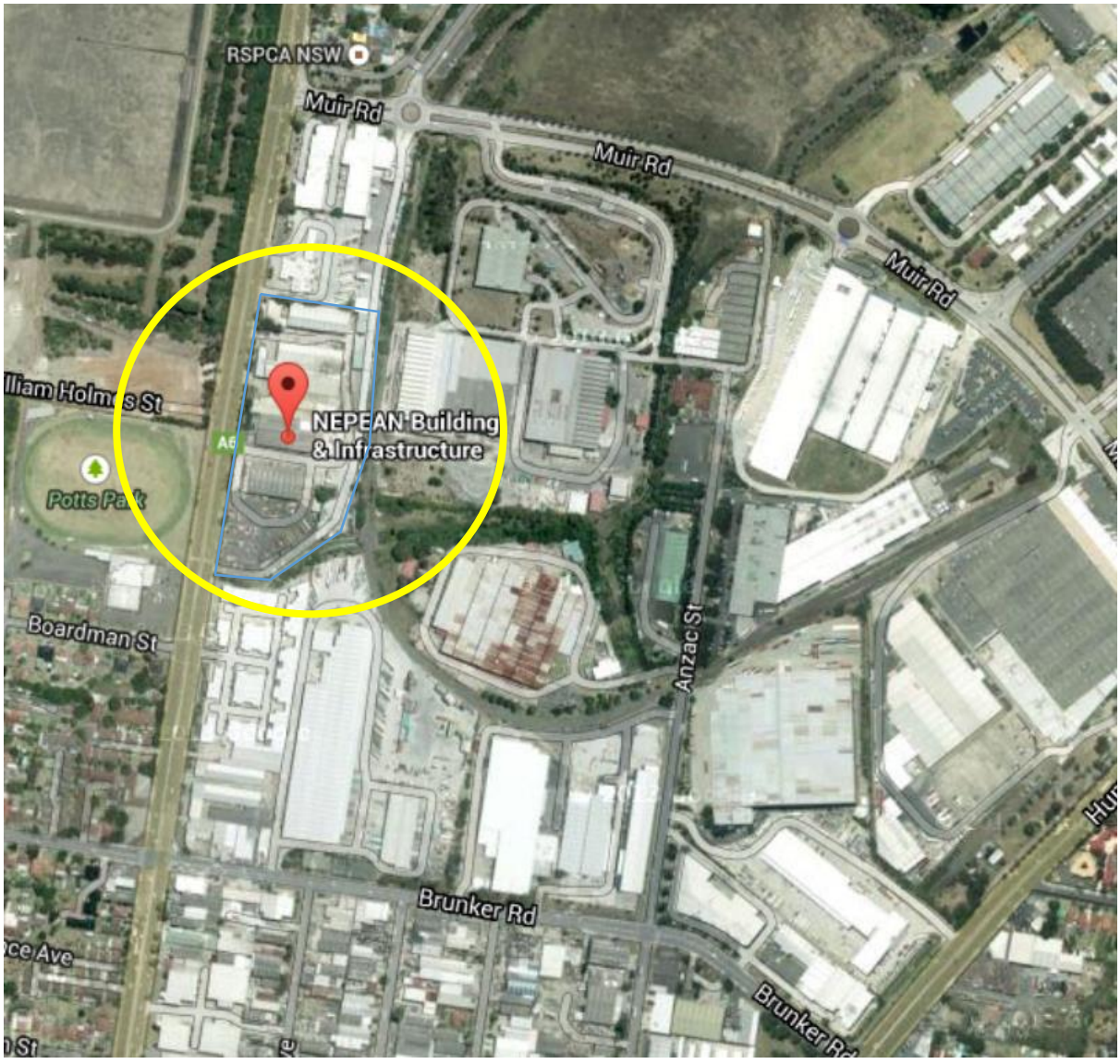
	Company	Address	Contact No.
1	BP Petrol Station Potts Hill	155 – 157 Rookwood Road Yagoona NSW 2199	Ph 9790 5377
2	Container Depot	Rookwood Road Yagoona NSW 2199	Ph 9793 7874
3	Construction Site	15 Muir Road Chullora NSW 2199	TBA
4	Toll SPD	10 Brunker Rd, Chullora, NSW 2190	(02) 8713 7200

- **Appendix D – Site Maps**

  A) Location of the premises to which the licence relates

Figure 1: Yagoona Site
Source: Google Earth.

B) surrounding area likely to be affected by a pollution incident.



Legend	
	Property boundary
	Likely incident impact zone

C) Location of potential pollutants and type / Emergency Response Equipment

D) Location of storm water drains and watercourse flow direction