

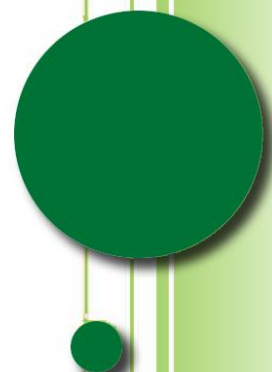


SOUTHERN OIL REFINING PTY. LTD.

POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN (PIRMP)

(ENVIRONMENTAL MANAGEMENT PLAN
(EMP))

Review Date: 15-08-2027



Document Control

This Pollution Incident Response Management Plan (PIRMP) for Southern Oil Refining (SOR) is a controlled document.

This Plan has been approved by:

DATE	NAME (PRINTED)	ROLE	SIGNATURE
	Tim Rose	Managing Director	

This Plan has been reviewed by:

DATE	NAME (PRINTED)	ROLE	SIGNATURE
	Tim Rose	Managing Director	
	Badyn Cook	Refinery Manager	
	Huw Dare Edwards	Quality Manager	

The designated Environmental Management Plan Co-ordinator is:

DATE	NAME (PRINTED)	ROLE	SIGNATURE
	Keith Hackett	Health, Safety Environment and Training Supervisor	

This copy has been issued to:

Controlled Copy No:	
Position	
Current Incumbent	

Controlled copies of this EMP are held by the personnel listed below:

Controlled Copy No.	Position	Current Incumbent
Master Copy (Digital Format)	Health, Safety Environment and Training Supervisor	Keith Hackett
2	Quality Manager	Huw Dare-Edwards
3	Refinery Manager	Badyn Cook
4	Department of Environment, Climate Change and Water, NSW	N/A
5	General Manager, Wagga Wagga City Council	N/A

Controlled copies must be approved by the Managing Director of SOR before issue. Amendments made to this PIRMP shall be distributed by the designated Pollution Incident Response Management Plan Co-ordinator to the holder of each controlled copy of the PIRMP. The holder of each controlled copy is responsible for ensuring the amended pages are updates to the controlled copy.

History of Documentation

Version	Pages Revised	Amendment Description	Reason for Amendment	Document Editor	Amendment Date
A	All	Working Draft for Review	Initial Plan	Debra Watson, AEMS Environmental Consultant	21/05/2007
B	All	Revised Draft	Document Issue	Debra Watson, AEMS Environmental Consultant	02/09/2007
C	All	Major Revision	Document Issue	Huw Dare-Edwards, Environmental Consultant	13/09/2010
D	All	Review	Document Issue	Huw Dare-Edwards, Environmental Supervisor	31/07/2014
E	All	Major Revision	Document Issue	James Harvey Health, Safety Environment and Training Supervisor	10/07/2017
F	All	Revision	Document Issue	James Harvey Health, Safety Environment and Training Supervisor	10/07/2018
G	All	Revision	Document Issue	James Harvey Health, Safety Environment and Training Supervisor	02/09/2019
H	All	Revision	Document Issue	James Harvey Health, Safety Environment and Training Supervisor	01/09/2020
I	All	Revision	Document Issue	James Harvey Health, Safety Environment and Training Supervisor	01/09/2021
J	All	Additions	FCP & TOX2 DA13/0663.01	David Onions Plans Manager	14/06/2022
K	All	Revision	Document Issue	Huw Dare-Edwards, Quality Manager	15/12/2023
L	All	Revision	Document Issue	Keith Hackett Health, Safety, Environmental and Training Supervisor	15/08/2024

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Structure of Documentation

This Pollution Incident Response Management Plan (PIRMP) is divided into five (5) Sections and appendix:

- Section 1 describes the purpose, objectives and scope for this PIRMP;
- Section 2 provides a background of the facilities and operations to which this PIRMP applies;
- Section 3 details the formal environmental management systems in place;
- Section 4 describes the strategic management plans for identifying and managing potential risks to the environment; and
- Section 5 describes the monitoring and review processes that are undertaken to assess performance and identify opportunities for improvement.
- Appendix: Attachments

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Section 1: Introduction

1.1. Purpose

The purpose of this Pollution Incident Response Management Plan (PIRMP) is to:

- Provide guidance for personnel to manage potential and actual environmental risks and impacts arising from the operation of the Southern Oil Refining P/L (SOR) used oil re-refinery in Bomen, NSW;
- To ensure that environmental safeguards are implemented correctly; and
- To comply with the requirements of all relevant NSW and Federal legislation.

SOR are committed to developing and maintaining systems that ensure that a high standard of environmental management is achieved. This PIRMP is an integral component of SOR's Environmental Management Program.

1.2. Objectives

The objectives of the PIRMP are:

- To identify potential environmental impacts that may arise from the operation and establish mechanisms to monitor and manage any impact;
- To ensure that SOR's operations comply with all controlling environmental regulations, licences and consent conditions; and
- To establish protocols that, in the event of any failure to achieve either of the above objectives, will ensure expeditious remedial action so that any impacts can be minimised and operational procedures corrected to prevent any reoccurrence.

1.3. Scope

This Plan should be used for guidance for the management of environmental risks and impacts arising from the operation of the SOR Used Oil Re-Refinery located in the Bomen Business Park, Wagga Wagga.

It is intended that this Plan will be a working document that will be regularly reviewed and updated to include any new or altered processes being implemented at the SOR site. Variations and addendums to this Plan may be necessary for non-routine and/or project works to suit the nature and scale of the works being undertaken. It is important to keep in mind that the PIRMP must provide adequate information to enable compliance with the environmental conditions of approval and to properly manage environmental risks.

Section 2: Background

2.1. Project Description

SOR operate a purpose-built Used Oil Re-Refinery at 42 Lewington Street, in the Bomen Business Park. The facility is located approximately 5 kilometres north of Wagga Wagga, NSW.

The plant was commissioned in 2001 and has under-gone several upgrades since. The facility operates 24 hours a day, 7 days a week and employs approximately 30 people.

The facility is licensed by the EPA (EPL11408) for the following scheduled and fee-based activities:

Scheduled Activities

- Petroleum products and fuel production
- Resource recovery
- Waste disposal (thermal treatment)
- Waste processing (non-thermal treatment)
- Waste Storage

Fee Based Activity

- Non-thermal treatment of hazardous and other waste
- Petroleum products and fuel production
- Recovery of waste oil
- Thermal treatment of hazardous and other waste
- Waste Storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste

Scale

Any annual processing capacity
> 10000 - 200000 T annual
production capacity
> 20000 T – annual recovery
capacity
Any capacity
Any listed waste type stored

The SOR re-refining process removes contaminants from used oils to produce both heavy and light base oils for use in a range of lubrication products. The objectives of the operation are:

- The systematic recovery & refurbishment of non-renewable base oils for continued use at their highest value;
- The recovery of the fuel oil products for use within the process or as saleable products;
- The presentation of the process residues as a saleable heavy burner fuel product;
- The reuse of process waters on site;
- The optimum recovery of heat from all points of the plant;
- A “no waste” approach to meet the challenges of cleaner production tenants; and
- A commitment to achieve and exceed the relevant environmental standards (Patrick James & Associates, 1997)

The feedstock for the process consists of used oils from industry and collection centres which are delivered by tanker to the site for re-refining. The re-refining process consists of the following steps and represented as a process diagram in Attachment A (see Appendix).

2.2. Environmental Policy

SOR is committed to ensuring that their operations are managed so as to protect the environment. The Environmental Policy (see Appendix) of the company has determined that environmental protection will be achieved through the following measures:

- Efficient use of natural resources;
- Compliance with applicable laws, regulations, and statutory obligations;
- Optimal operational performance, transparency, and accountability;
- Implementation of appropriate Environmental Management Systems; and
- Personnel awareness and training with respect to environmental protection measures implemented.

2.3. Sustainability

SOR, a recycling and resource recovery company, has identified environmental performance as integral to all its operations. SOR strives to exceed environmental expectations by partaking in sustainable practices.

SOR strives to operate at a sustainable level with respect to:

- Reduction of our carbon footprint and the reduction of greenhouse gases;
- Energy conservation and where possible recovery;
- Water conservation and treatment and re-use; and
- Resource recovery of raw materials and consumables

Section 3: Environmental Management

3.1. Environmental Management Structure & Responsibilities

To ensure that the objectives of the PIRMP are achieved responsibilities and performance criteria have been defined for environmental management actions and activities. Environmental management responsibilities will be incorporated into job descriptions and performance measures, where applicable. Table 1 Summary of Environmental Responsibilities outlines the environmental management structure in place at the SOR operations and the responsibilities assigned to each of the management representatives.

Table 1 Summary of Environmental Responsibilities

Position	Name	Contact Details	Responsibilities
Managing Director	Tim Rose	+61 2 6925 8710	• Ensure that environmental safeguards are implemented and allocate adequate resources appropriate to the nature and scale of the operations. • Ensure that potential environmental and/or planning impacts are considered for any new projects or processes proposed
Refinery Manager	Badyn Cook	+61 2 5942 3705	• Identify potential and/or actual environmental hazards and ensure that operations are carried out so as to minimise impacts on the environment. • Ensure that SOR personnel and contractors are inducted and aware of the PIRMP. • Ensure that environmental controls are in place and maintained.
Health, Safety, Environmental and Training Supervisor	Keith Hackett	+61 2 5942 3702	• Site Environmental Representative • Coordinate environmental management activities including sampling and regulatory reporting. • Review environmental performance and advise top management. • Review PIRMP.

3.2. Legislative Requirements

The licences, permits and consents incumbent on the SOR operations are listed below (Table 2). Copies of issued licences, permits and approvals are provided in Attachment C.

Table 2 Summary of Regulatory Requirements

Legislation	Instrument	Section	Authority	Issue Date	Reporting Requirement
Protection of the Environment Operations Act 1997	Environmental Protection Licence No. 11408	R1	NSW EPA - NSW Department of Planning and Environment	19/07/2001	• Annual Return, comprising a Statement of Compliance and a Monitoring and Complaints Summary
		R4			• Must be submitted within 60 days of the anniversary date: 9th July
		08.3			• Annual Environmental Management Report (AEMR) See Table 3. • With the Annual Return present a summary of the inter-laboratory testing program.
Protection of the Environment Operations Regulation 1998		Chapter 3A National Pollution Inventory	NSW NPI Team NSW EPA - NSW Department of Planning and Environment	N/A	• Annual National Pollutant Inventory (NPI) report of calculated pollutant emissions (93 listed substances). • Must be submitted by 30th September each year
Water Act 1912	Water Bore Licence No. 40BL188287		NSW Office of Water		Nil
Environmental Planning and Assessment Act 1979	Development Consent DA13/0663.01		Wagga Wagga City Council	24/08/2021	Nil
Environmental Planning and Assessment Act 1979	Development Consent DA20/0725		Wagga Wagga City Council	04/02/2021	Nil
Environmental Planning and Assessment Act 1979	Development Consent DA18/0327		Wagga Wagga City Council	05/11/2018	Nil
Environmental Planning and Assessment Act 1979	Development Consent DA16/0253		Wagga Wagga City Council	06/06/2016	Nil
Environmental Planning and Assessment Act 1979	Development Consent DA13/0663		Wagga Wagga City Council	06/06/2014	Nil
Environmental Planning and Assessment Act 1979	Development Consent DA11/0052		Wagga Wagga City Council	22/03/2011	Nil
Environmental Planning and Assessment Act 1979	Development Consent ADA05/0066		Wagga Wagga City Council	19/12/2005	Nil
Environmental Planning and Assessment Act 1979	Development Consent ADA02/0003		Wagga Wagga City Council	14/02/2003	Nil
Environmental Planning and Assessment Act 1979	Development Consent DA010234		Wagga Wagga City Council	02/05/2001	Nil

Legislation	Instrument	Section	Authority	Issue Date	Reporting Requirement
Environmental Planning and Assessment Act 1979	Development Consent DA970081 A1	c l q bb l	Wagga Wagga City Council	28/08/2000	• Continuous recording of incinerator temperature and oxygen concentration (to be made available on request). • Annual Waste Management Report • Hazard Audit Report every three (3) years • Annual bund (impermeable) report • Quarterly groundwater level and quality monitoring and evaluation report
Environmental Planning and Assessment Act 1979	Development Consent DA81/97	c l q bb	Wagga Wagga City Council	12/09/1997	• Continuous recording of incinerator temperature and oxygen concentration (to be made available on request). • Annual Waste Management Report • Hazard Audit Report every three (3) years • Annual bund (impermeable) report
The National Greenhouse and Energy Reporting Act, 2007 (NGER)			NDEVR Sydney Office		• Registration obligations fall on corporations in 2009 who emit 87.5kt or more of CO₂e or consume (or produce) 350Tj of energy. • Companies, if companies reach threshold they must register by 31 August, and report by 31 October, following the financial year in which they meet a threshold. • Online submission via Environmental Management Software for NGER

3.3. Reporting

To ensure that a high standard of environmental performance is achieved and maintained this Pollution Incident Response Management Plan specifies numerous internal and external environmental performance reporting requirements.

Table 3 Summary of Environmental Management Reporting Requirements

Reporting Requirement	Content	Frequency	Responsibility	Distribution
Environmental Protection Licence (L11408) Annual Return	A certified Statement of Compliance and a Monitoring and Complaints Summary must be submitted using the NSW EPA approved and supplied form. Particulars will include: • whether all monitoring required by the licence has been carried out; • if all the monitoring has not been carried out, what monitoring has not been carried out and the reasons why the monitoring has not been carried out; • whether all the monitoring data required to be reported to the Department of Environment and Conservation by the licences have been so reported; • whether all the monitoring data was reported within the time specified in the licences; • if all the monitoring data has not been reported, or has not been reported within the time specified, the reasons why the monitoring data has not been so reported; • whether all the monitoring data reported was derived from monitoring carried out in accordance with the licences; • if any of the monitoring data reported to the Authority was not derived from monitoring carried out in accordance with the licences, what monitoring data was not so derived and the reasons why the monitoring data was not so derived; • whether every condition of the licences have been complied with; • if one or more conditions have not been complied with, in relation to each such condition: ○ the nature and reason of the non-compliance; ○ the reasons for that noncompliance; ○ any action taken to prevent, control or mitigate the non-compliance; and ○ any action that has been or will be taken to prevent a recurrence of the non-compliance; ○ Load Based Licence calculations are included as part of the Annual Return.	Annual	Health, Safety, Environmental and Training Supervisor	Board of Directors & NSW EPA – Licence Administration and Revenue Unit

Reporting Requirement	Content	Frequency	Responsibility	Distribution
Annual Environmental Management Report (AEMR)	Clause R4. Annual Environmental Management Report R4.1 The licensee must prepare and submit to the NSW EPA an Annual Report for the premises which contains an assessment of environmental performance relevant to licence conditions including: • tabulated results of all monitoring data required to be collected by this licence and any other monitoring data gathered to comply with the requirements of the Development Consent for the premises; • a graphical presentation of data from at least three years (if available) in order to show variability and/or trends. Any statistically significant variations or anomalies should be highlighted and explained; • an analysis and interpretation of all monitoring data; • an analysis and response to any complaints received; • identification of any deficiencies in environmental performance identified by the monitoring data, trends or incidents and of remedial action taken or proposed to be taken to address these deficiencies; and • recommendations on improving the environmental performance of the facility. Note: Annual Return must contain a summary of inter-laboratory testing program	Annual	Health, Safety, Environmental and Training Supervisor	Managing Director, Refinery Manager, NSW EPA – Licence Administration and Revenue Unit
National Pollutant Inventory	• Section A Reporting Facility Information • Section B Substance Reduction Information • Section C Emission Reduction Activities • Section D Substance Transfer Information • Section E Certification	Annual	Health, Safety, Environmental and Training Supervisor	NSW EPA– NPI Unit On-line submission
Hazard Audit Report	Audit shall be carried out in accordance with the Department of Urban Affairs & Planning Hazardous Industry Planning Advisory Paper No. 5 “Hazard Audit Guidelines”	3 yearly	Health, Safety, Environmental and Training Supervisor; Refinery Manager	Managing Director, Refinery Manager, Quality Manager, Health, Safety, Environmental and Training Supervisor, Director-General Dept. Planning, Wagga Wagga City Council
Complaints Management Report	• Date and time of complaint; • Name and contact details of complainant (if provided); • Nature of complaint; • Results of investigation; • Corrective actions implemented; • Corrective actions outstanding; • Response to complainant; and • Whether complaint has been satisfactorily resolved	Each complaint received	Health, Safety, Environmental and Training Supervisor; Refinery Manager	Managing Director, NSW EPA (Annual Return)

Reporting Requirement	Content	Frequency	Responsibility	Distribution
Incident / Non-compliance report	- Defined as any spillage, release, upset, out of limits operation, procedural violation, which potentially poses a threat to human health and/or may result in non-compliance with regulations, permits and/or intervention of environmental protection authorities or results in penalties or fines. - Details of incident (date, time, person involved, description of incident, corrective actions implemented to minimise harm and prevent recurrence).	Every incident or non-compliance identified	SOR personnel and contractors	Environmental Management Review Board. NSW EPA to be notified where actual or potential "material harm" to the environment.
National Greenhouse Emissions Reporting	- Facility Information; - Scope 1 Emissions; - Scope 2 Emissions; and - Offsets	Annual	Health, Safety, Environmental and Training Supervisor; Refinery Manager	Environmental Management Review Board Online Submission to NGER

3.4. Environmental Training

To ensure a culture of environmental awareness SOR requires effective education and training of SOR personnel and SOR employed contractors and consultants. The success of this Pollution Incident Response Management Plan is dependent upon the understanding by SOR personnel of the issues involved and the individual roles and responsibilities identified by this Pollution Incident Response Management Plan. Central to this senior personnel recognise the value of building a belief and commitment to SOR's Environmental Policy. Training and education of personnel is viewed as a means of removing some of the obstacles to the successful and efficient implementation of this Pollution Incident Response Management Plan.

To this end each individual, dependent on their role, must be able to identify the potential impacts of their actions and decisions on the environment and manage the impacts accordingly or seek advice from their supervisor. Specific roles and responsibilities for implementation of this Pollution Incident Response Management Plan are provided in:

3.1. Environmental Management Structure & Responsibilities.

Records of environmental training will be kept on personnel records.

The following table identifies the various principles of environmental education that SOR will implement.

Table 4 Awareness and Training Principles

Inclusive of all SOR personnel
Environmental education cannot be confined to any group of personnel. It is a responsibility for all staff, including contractors and consultants.
Performed on an on-going basis
Knowledge and skills should be refreshed in light of new environmental aspects; issues and management techniques/mechanisms.
Practical in approach
This is a fundamental requirement of effective environmental education. Awareness and training programs must be geared toward actions which will effectively result in improved environmental outcomes and conditions at the facility rather than an accumulation of inert knowledge or impractical skills.
Conformity with SOR Philosophy
In order for SOR to establish an effective environmental awareness training program, it needs to encourage the pursuit of environmental goals in a way that acknowledges other goals of SOR, including safety, productivity and efficiency – it should not be taught in a way that is divorced from the core business needs of the facility.
Inductions
All SOR personnel, contractors and consultants will undertake an induction that will include SOR responsibilities to the environment, environmental awareness training, outline that improved housekeeping is a goal of production and their specific environmental responsibilities. Inductions will be the primary means of environmental training for the majority of personnel. Selected SOR personnel will receive additional environmental training on a need's basis, as assessed by SOR management and/or audit.

3.5. Emergency Preparedness

A comprehensive SOR Emergency Plan has been prepared to cover all aspects of emergency response for the SOR Bomen facility, including those that have the potential to impact on the environment. A summary of the plan is presented in the section below.

3.5.1. Types of Environmental Emergencies

The types of potential environmental emergency planned for include:

- **Fire**
 - May cause the release of particulates and toxic fumes
 - May produce contaminated run-off from water and chemical suppressants
- **Spill and Material Release**
 - May cause surface water contamination via drains and channels
 - May cause soil contamination
 - May cause contamination of groundwater aquifers
 - May result in the release of flammable liquids and vapours capable of causing a fire and explosion hazard
 - May cause release of dust, toxic fumes and/or liquids
 - May result in the contamination of equipment and storage vessels
- **Accident**
 - May cause fire, explosion and/or spill
 - May cause structural damage to containment systems
 - May result in the mixing of incompatible chemicals
 - May cause surface water contamination through the release of hazardous materials
 - May cause soil contamination through the release of hazardous materials
 - May cause the release of fumes or vapours into the atmosphere
- **Natural event**
 - Heavy rains that may result in flooding of drains and waterways
 - High winds that may result in dust and flying debris
 - Earthquakes that may result in structural damage to containment systems
- **Loss of utilities and/or plant operating disruption**
 - May cause process failure resulting in the release of excessive smoke from the boiler
 - May cause process failure resulting in the overflow of effluent from containment systems

3.5.2. Environmental Emergency Response Procedures

3.5.2.1. Immediate Response upon Alarm

As per the SOR Emergency Plan, the Refinery Manager will act as the Chief Warden. All other members of the shift should ready themselves in preparation to respond to an emergency situation and monitor the radio for the initiation of an emergency response by the Chief Warden. With respect to environmental emergencies the following process will be enacted to ensure that appropriate control measures are implemented to protect the environment.

3.5.2.2. Preparedness and Prevention

To ensure an appropriate and adequate response to Environmental Emergencies SOR have implemented the following measures:

- Maintenance of a Hazardous Materials (SDS) Register.
- Preparation of emergency plant shut down procedures.
- Storage of hazardous substances within bunds.
- Maintenance of a surface water retention pond.
- Maintenance of spill response equipment and materials on site; and
- All SOR personnel receive emergency response training.
- Annual updates to NSW Fire and Rescue Pre Incident Plan (PIP)

3.5.2.3. Emergency Assessment

Upon the notification of an emergency incident, and dependent upon the nature of the incident, the Chief Warden shall determine the appropriate response to be initiated. Unless otherwise instructed by the Refinery Manager, the following actions are the responsibility of the Chief Warden:

1. Determine and initiate appropriate control measures to prevent and/or minimise the impact on personnel safety and the environment, whether the harm occurs on or off the premises.
2. Advise the Refinery Manager of the control measures being implemented, and the resources required; and
3. Liaise with Emergency Services personnel, as required.

3.5.2.4. Safety Establishment and Resumption of Work

As with any incident type it is essential that the workplace be secured such that there is no on-going risk to the safety of personnel as a result of the incident. For example, hydrocarbon spills should be thoroughly cleaned up, leaving no residue, so that a slip hazard does not remain, contaminated areas/materials should be barricaded, and sign posted.

In addition to the risk posed to safety, consideration should be given to securing any plant, equipment or materials associated with an incident so that any further risk to the environment is managed. Of particular concern is the possibility of a rain event that could further mobilize contaminants prior to the completion of the post-incident clean-up.

Actions that could be considered to minimise this risk include:

- Use of temporary bunding (e.g. earth, hay bales).
- Covering of contaminated materials with an impervious layer (plastic sheeting, tarpaulins);
- Ensuring adequate freeboard in retention pond and drains; and
- Re-direction of drainage.

The return of plant and equipment associated with an incident to an operational state will not occur until such time that repairs and/or clean-up have been completed so as to ensure that there is no on-going risk to the environment.

3.5.2.5. Remediation

The Health, Safety, Environmental and Training Supervisor shall arrange for the remediation of areas affected by the incident. It is essential that any waste generated as a result of an incident is handled and disposed of safely and in accordance with statutory requirements. All wastes resulting from incidents shall be assessed and classified in accordance with the *NSW EPA, Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-liquid Wastes, 1998*, and an appropriate management plan determined.

3.5.2.6. Incident Reporting

The Duty Controller shall report any environmental incidents to the Health, Safety, Environmental and Training Supervisor or Refinery Manager. The Health, Safety, Environmental and Training Supervisor shall report any incident that threatens or causes material harm to the environment to the Refinery Manager as soon as practicable. The Duty Controller shall also participate in the incident investigation and reporting, providing details of the actions implemented during the incident and any gaps in the site's response capability. All incidents will be reported and recorded using the standard Incident Report Form (refer Attachment E).

The conditions of the Environmental Protection Licenses issued for the SOR operation include the requirement to report any incident that poses or causes "material harm" to the environment, the EPA must be notified immediately and provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

If the EPA considers that the incident is causing or likely to cause material harm to the environment (whether the harm occurs on or off the premises) they will direct the organization to submit a written report of the event within a specified period of time.

The report may be required to include the following information:

- The cause, time, and duration of the event.
- The type, volume and concentration of every pollutant discharged as a result of the event.
- The name, address and business hours telephone number of employees or agents of the licensee who witnessed the event.
- The name, address, and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort.
- Action taken by the licensee in relation to the event, including any follow-up contact with any complainants.
- Details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- Any other relevant matters.

In order to meet the reporting requirements detailed above, should an incident occur that results in material harm to the environment in addition to obtaining the standard incident reporting information, photographs and samples should be collected. The Health, Safety, Environmental and Training Supervisor should be contacted to arrange for the collection and analysis of appropriate samples. As a minimum, samples should be collected from both up-gradient/stream and down-gradient/stream of the pollution, as well as from the contaminated area. The appropriate analysis is dependent upon the nature of the contaminants.

The Health, Safety, Environmental and Training Supervisor or Refinery Manager is responsible for reporting, immediately to the EPA, any incidents that threaten or cause "material harm" to the environment.

Incidents will be reviewed to identify the contributing factors and root cause of the incident. The review will also assess the adequacy of the response to the incident and identify areas for improvement and generate corrective action plans, as required. An external Environmental Specialist may be included in the review of significant environmental incidents to provide professional input.

Table 5 Key Emergency Response Contact Details

Organisation and Position	Name	Contact Details
SOR Managing Director	Tim Rose	+61 2 5942 3710 / +61 419 954 951
SOR Refinery Manager	Badyn Cook	+61 2 5942 3705 / +61 466 586 320
SOR Quality Manager	Huw Dare Edwards	+61 2 5942 3755
Refinery Control Room	Technical Staff	+61 2 5942 3707 / +61 427 285 738
SOR Health, Safety, Environmental and Training Supervisor	Keith Hackett	+61 2 5942 3702 / +61 409 728 664
NSW EPA Pollution Hotline (After hours)	N/A	131 555
Wagga Wagga City Council	N/A	1300 292 442 +61 2 69263 9100 Email: council@wagga.nsw.gov.au
Fire & Rescue NSW; Turvey Park Station	N/A	000

Section 4: Implementation

4.1. Risk Assessment

This section of the PIRMP identifies the actual and potential risks to the environment arising from the SOR operations and activities, and the approved management activities, controls and monitoring to be implemented to prevent or minimise the impacts for each of the risks that have been assessed as being significant.

The management activities, controls and monitoring specified in this section is based on risk assessment and statutory requirements. The information provided in this section should be utilised by SOR personnel to guide them in the implementation of environmental management activities. If there are any doubts as to the correctness of the information contained in this PIRMP, personnel should seek guidance from their Supervisor, the Refinery Manager or the Quality Manager.

The following risk assessment methodology is used by SOR to determine the level of environmental risk associated with each of the task and activities undertaken:

Table 6 Risk Assessment

LIKELIHOOD	CONSEQUENCE
5 Very Likely	1 Minor
4 Likely	2 Important
3 Unlikely	3 Serious
2 Rare	4 Very Serious
1 Almost Impossible	5 Catastrophic:

Methodology of Ranking Risk = LIKELIHOOD X CONSEQUENCE

		Consequence				
		1 - Minor (M)	2 - Important (I)	3 - Serious (S)	4 - Very Serious (VS)	5 - Catastrophic (C)
Likelihood	Very Likely	B	B	A	A	A
	Likely	C	B	B	A	A
	Unlikely	D	D	C	A	A
	Rare	D	D	C	B	B
	Almost Impossible	D	D	D	D	C

- **A - “Extreme”**
 - Immediate action required.
 - Introduce further controls to reduce the risk rating.
 - Re-assess before proceeding.
 - In the event that the risk cannot be mitigated consultation with senior management is required
- **B – “High”**
 - All feasible/possible controls need to be considered and consultation needs to have occurred with HSE Supervisor, Worker and Refinery Manager on controls that could be implemented, with ultimate sign off by Refinery Manager indicating that no further controls could be reasonably in place before proceeding.
 - Frequently monitor to ensure control measures are working.
- **C – “Significant”**
 - Introduce further controls if practical.
 - Consultation with relevant supervisor with knowledge/experience in the area required.
- **D – “Moderate”**
 - Specific management responsibility must be specified.
 - Proceed with work, monitor and review frequently.

4.2. Environmental Management Activities and Controls

4.2.1. Air Quality

Environmental Risks

The potential and actual risks to the environment as a result of air emissions from site activities include:

- Emission of a range of contaminants from the manufacturing process;
- Fugitive emissions from tanks, valves, pumps, sumps and pits;
- Exhaust fumes from site vehicles and machinery; and
- Generation of dust from unsealed surfaces.

Environmental Controls

In order to mitigate the environmental risks to air quality, the following control measures will be implemented and maintained:

- Load pre-acceptance monitoring to ensure that incoming loads are acceptable, and processing will not give rise to unacceptable environmental hazards.
- Routine maintenance of pumps, valves and other plant and equipment to minimise fugitive emissions.
- Isolation and vapour evacuation of process vessels prior to maintenance.
- Process control via continuous monitoring of temperature and oxygen concentration at the afterburner and maintaining these within specifications.
- Installation and operation of an afterburner system which accepts vacuum overheads, sour water, exhaust from the hot oil heater and tank vapour recovery gases.
- Installation and maintenance of carbon canisters on tanks designated as being non-odorous;
- Prompt clean-up of spilt materials;
- Minimise use of vehicles on unsealed areas of the site to minimise dust generation; and
- Maintain vegetation established on site to control dust generation.

Table 7 Environmental Management Tasks: Air Quality

Environmental Management Task	Procedure	Responsibility	Frequency
Visual check of emissions from the utilities block stack during shift inspection of plant and equipment and undertake appropriate action as required	Checklist	Shift Operator	At least once per shift
Continuous monitoring of afterburner temperature and oxygen concentration and operation of plant to maintain concentration/s with specification	N/A	Shift Operator	Continuous
Sampling of sour water and analysis for pH and EC	WI-754	Laboratory Supervisor	As Required
Air quality monitoring of emissions from Environment Protection Licence (EPL) Point 7 –Stack of the catalytic oxidiser on the Hydrogenation Plant (see EPL 11408, L3.2) and analysis for: • Dioxins and Furans • Dry gas density • Hydrogen Sulfide • Moisture content • Molecular weight of stack gases • PCBs • Speciated organic compounds (6 monthly) • Temperature • Velocity • Volatile organic compounds • Volumetric flowrate	N/A	Health, Safety, Environmental and Training Supervisor	Biannual

Environmental Management Task	Procedure	Responsibility	Frequency
Air quality monitoring of emissions from Environment Protection Licence (EPL) Point 1 – Utilities Block Stack (see EPL 11408, L3.2) and analysis for: - Carbon monoxide - Chlorine - Chromium - Dry gas density - Moisture content - Oxygen - Temperature - Velocity - Volumetric flow rate - Polycyclic aromatic hydrocarbons - Speciated organic compounds - Nitrogen Oxides - Hydrogen Sulfide - Dioxins and Furans (No specified frequency) - Hydrogen Chloride - Solid Particles - Sulfuric acid mist and sulfur trioxide (as SO₃) - Total Fluoride - Hazardous substances (antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, mercury, manganese, nickel, selenium, tin and vanadium and their compounds) - Volatile organic compounds	N/A	Health, Safety, Environmental and Training Supervisor	Biannual
Assessment of air emission results from EPL Point 1 and 7 against performance criteria (EPL 100 percentile concentration limits) and development of corrective action plan where non-conformance(s) identified.	N/A	Health, Safety, Environmental and Training Supervisor	Biannual
Air quality monitoring of emissions from Environment Protection Licence (EPL) Point 8 – Wet Scrubber (see EPL 11408, L3.2) and analysis for: Volatile organic compounds	N/A	Health, Safety, Environmental and Training Supervisor	TBD
Air quality monitoring of emissions from Environment Protection Licence (EPL) Point 9 – Thermal Oxidiser (TOX2) (see EPL 11408, L3.2) and analysis for: - Dioxins and Furans - Hydrogen chloride - Chlorine - Total fluoride - Nitrogen oxides - Sulfuric acid mist and sulfur trioxide (as SO₃) - Hydrogen sulfide - Type 1 and Type 2 substances in aggregate - Cadmium - Mercury - Total solid particles - Volatile organic compounds	N/A	Health, Safety, Environmental and Training Supervisor	TBD
Assessment of air emission results from EPL Point 8 and 9 against performance criteria (EPL 100 percentile concentration limits) and development of corrective action plan where non-conformance(s) identified.	N/A	Health, Safety, Environmental and Training Supervisor	TBD
Record air emission results for the reporting period in the EPL Annual Return	N/A	Health, Safety, Environmental and Training Supervisor	Yearly

Environmental Management Task	Procedure	Responsibility	Frequency
EPL Load Based Licensing monitoring and reporting of the following pollutants to air: - Arsenic - Benzene - Benzo(a)pyrene (equivalent) - Fine Particulates - Hydrogen Sulfide - Lead - Mercury - Nitrogen Oxides - Sulfur Oxides - Volatile Organic Compounds	N/A	Health, Safety, Environmental and Training Supervisor	Biannual monitoring Annual reporting
Record air quality results and provide interpretation in the Annual Environmental Management Report	N/A	Health, Safety, Environmental and Training Supervisor	Yearly

Note:

- EPL Point 8 and EPL Point 9 are subject to additional reporting criteria related to commissioning activities as outlined in EPL 11408.
- As noted above, the frequency of air emissions testing for EPL Point 8 and EPL Pint 9 will be prescribed following the provision of this additional reporting.

Table 8 Concentration Limits: Air Quality

Point 1 Pollutant	Units	Concentration Limit
Cadmium	g/m ³	0.0002
Chlorine	g/m ³	0.2
Mercury	g/m ³	0.0002
Nitrogen oxides	g/m ³	0.3
Volatile Organic Compounds	g/m ³	0.04
Hydrogen sulfide	g/m ³	0.005
Dioxins and Furans	ng/m ³	0.1
Hydrogen chloride	g/m ³	0.1
Solid Particles	g/m ³	0.05
Sulfuric acid mist and sulphur trioxide (as SO ₃)	g/m ³	0.1
Total Fluoride	g/m ³	0.05
Hazardous substances	g/m ³	0.001

Point 7 Pollutant	Units	Conc. Limit	Ref. Cond.	O ₂ correction	Av. Period
PCBs	ug/m ³	1	Dry, 273K, 101.3kPa	7%	
Hydrogen sulphide	mg/m ³	1	Dry, 273K, 101.3kPa	7%	1hr block
Volatile Organic Compounds	mg/m ³	40	Dry, 273K, 101.3kPa	7%	1hr rolling
Dioxins and Furans	ng/m ³	0.1	Dry, 273K, 101.3kPa	11%	

Point 8 Pollutant	Units	Conc. Limit	Ref. Cond.	O ₂ correction	Av. Period
Volatile Organic Compounds	g/m ³	0.01	Dry, 273K, 101.3kPa		1hr

Point 9 Pollutant	Units	Conc. Limit	Ref. Cond.	O ₂ correction	Av. Period
Dioxins and Furans	ng/m ³	0.1	Dry, 273K, 101.3kPa	11%	6 hrs
Hydrogen chloride	g/m ³	0.1	Dry, 273K, 101.3kPa	3%	1 hr
Chlorine	g/m ³	0.2	Dry, 273K, 101.3kPa	3%	1 hr
Total fluoride	g/m ³	0.05	Dry, 273K, 101.3kPa	3%	1 hr
Nitrogen oxides	g/m ³	0.3	Dry, 273K, 101.3kPa	3%	1 hr
Sulfuric acid mist and sulphur trioxide (as SO ₃)	g/m ³	0.1	Dry, 273K, 101.3kPa	3%	1 hr
Hydrogen sulphide	g/m ³	0.005	Dry, 273K, 101.3kPa	3%	1 hr
Type 1 and Type 2 substances in aggregate	g/m ³	0.001	Dry, 273K, 101.3kPa	3%	1 hr
Cadmium	g/m ³	0.0002	Dry, 273K, 101.3kPa	3%	1 hr
Mercury	g/m ³	0.0002	Dry, 273K, 101.3kPa	3%	1 hr
Total solid particles	g/m ³	0.05	Dry, 273K, 101.3kPa	3%	1 hr
Volatile organic compounds	g/m ³	0.02	Dry, 273K, 101.3kPa	3%	1 hr

4.2.2. Contaminated Ground Water

Environmental Risks

The potential and actual risks arising from contaminated ground water include:

- Migration of contamination plume affecting downstream surface water receptors;
- Migration of contamination plume affecting downstream ground water supplies used for agricultural or potable purposes; and
- Generation of volatile contaminants affecting on and/or off-site personnel.

Environmental Controls

To mitigate the potential and actual risks posed by ground water contamination the following control measure will be implemented:

- A contamination assessment will be conducted and a Remediation Action Plan (RAP) developed and implemented; and
- Installation of monitoring bores on site and routine monitoring of groundwater quality to determine the rate of natural attenuation of the contamination plume.

Table 9 Environmental Management Tasks: Contaminated Groundwater

Environmental Management Task	Procedure	Responsibility	Frequency
Sampling and analysis of site ground water bores for: • Standing water level • pH • Electrical conductivity • TPH/BTEX • Phenols • PFOS & PFOA (Yearly)		Health, Safety, Environmental and Training Supervisor	Biannual
Reporting and interpretation of remediation program and analytical results, and any proposed corrective actions, in the Annual Environmental Report (AER)		Health, Safety, Environmental and Training Supervisor	Yearly

Table 10 Performance Indicators: Contaminated Groundwater

Indicator	Values
TPH/BTEX	Reducing over time
pH	Stable between 6.5 to 7.5

Corrective Actions

Corrective actions, in the form of an alternate remediation strategy, will be implemented should the necessary geochemical and biochemical indicators be determined as not being present in the ground water environment and if the modelled rate of contamination attenuation is unacceptable.

4.2.3. Contaminated Soil**Environmental Risks**

The potential and actual risks arising from contaminated soil include:

- spread of contamination to uncontaminated soils;
- contamination of ground water;
- surface water contamination from runoff;
- contaminated surface water leaving site and affecting downstream receptors;
- contaminated dust generation; and
- Inappropriate off-site disposal.

Environmental Controls

To mitigate the environmental risks from contaminated soil the following controls will be implemented:

- All environmentally hazardous materials will be handled and stored within appropriately bunded areas;
- Contaminated soils will be recovered, where feasible, bio-remediated and re-used on site or disposed of within NSW EPA guidelines;
- Bio-remediation pad/s established on site within bunding, on impermeable liner, with closed drainage collection system;
- Prepare a map of site showing location of potentially contaminated soil if appropriate;
- Maintenance of adequate spill response materials on site;
- Maintenance of free-product interception sumps in areas of known subsurface contamination; and
- A first flush dam and sedimentation pond to capture runoff, allow settlement of solids and increasing on-site retention time.

Table 11 Environmental Management Tasks: Contaminated Soil

Environmental Management Task	Responsibility	Frequency
Assess likelihood, and if necessary, sample and analyse, potentially contaminated soils to be excavated for any proposed projects	Health, Safety, Environmental and Training Supervisor	As required
Inspect and pump-out interception sumps	Health, Safety, Environmental and Training Supervisor	Monthly
Establish and operate bio-remediation pad(s)	Health, Safety, Environmental and Training Supervisor	As required
Sample and analyse bio-remediation pad(s) soil for pH and Total Petroleum Hydrocarbons and assess contaminant remediation status	Health, Safety, Environmental and Training Supervisor	As required
Report soil remediation process and outcomes in Annual Environmental Report, to include: • Volume of soil subject to remediation; • Location of bio-remediation pads; • Analytical results from the monitoring program; and • Location of the placement of remediated soils on site.	Health, Safety, Environmental and Training Supervisor	As required

Performance Indicators

- No in-situ contaminated soil;
- Contaminated soils are deposited within designated and bunded bioremediation pad/s located on site.
- No dust or leachate generated from the bioremediation pad/s.
- The bioremediation process will achieve a satisfactory rate of remediation, a maximum of 24 months.
- The concentration targets for the soils subject to the bioremediation process must be achieved prior to the re-use of the remediated soil on site. The targets are:
 - Total Petroleum Hydrocarbons C6 – C9 < 65 mg/kg (dry weight)¹
 - Total Petroleum Hydrocarbons C10 – C40 < 1,000 mg/kg (dry weight)²

1. Threshold concentrations for sensitive land use – soils, NSW EPA, 1994, *Guidelines for Assessing Service Station Sites*

2. Threshold concentrations for sensitive land use – soils, NSW EPA, 1994, *Guidelines for Assessing Service Station Sites*

Corrective Actions

The following corrective actions will be implemented if performance criteria are not achieved:

- Initiation of a contamination assessment and risk assessment where the volume of contaminated soil exceeds 10m³ and cannot be readily recovered for remediation;
- Refurbishment of bunds and/or liner in the case of damage;
- Application of water sprays or tarpaulin covers to control windborne dust generated from the pad/s;
- Application of water, soil pH additive or nutrients to the bioremediation pad contents if the rate of remediation is unsatisfactory; and
- Application of additional bioremediation product if concentration targets are not achieved.

4.2.4. Contaminated Storm Water

Environmental Risks

The potential and actual risks arising from contaminated storm water include:

- odour generation;
- spread of contamination to soils;
- contamination of ground water; and
- contaminated surface water leaving site and affecting downstream receptors.

Environmental Controls

To mitigate the environmental risks from contaminated surface water the following controls will be implemented and maintained:

- All environmentally hazardous materials will be handled and stored within appropriately bunded areas;
- Contaminated soils will be removed as soon as practicable;
- Maintenance of adequate spill response materials on site;
- Separation of process water and storm water drainage systems;
- A first flush tank and pre-release pond to capture runoff, allow settlement of solids and increasing on-site retention time;
- Water quality monitoring program; and
- Pollution Incident Response Management Plan development and implementation to minimise risk of unacceptable impact resulting from SOR operations.

Table 12 Environmental Management Tasks: Contaminated Storm Water

Environmental Management Task	Responsibility	Frequency
Inspect first flush tank to determine suitability of captured water for release	Health, Safety, Environmental and Training Supervisor	Prior to Release
Inspection, sampling and analysis of pre-release basin to determine suitability of captured water for release	Health, Safety, Environmental and Training Supervisor	Prior to Release
Pump out and disposal of contaminated water captured within the first flush tank or pre-release basin	Health, Safety, Environmental and Training Supervisor	As required

Environmental Management Task	Responsibility	Frequency
Preparation and submission of quarterly waste movement report to NSW EPA when contaminated water has been disposed off-site	Refinery Manager	Quarterly
Report on the process and details of contaminated water management in the Annual Environmental Report (AER) to include: details of contaminated water disposal (transporter, receiver and volume)	Health, Safety, Environmental and Training Supervisor	Yearly

Performance Indicators

- The concentration of contaminants in surface water released off-site are below the performance criteria specified in 4.2.14 for surface water discharges;
- Captured contaminated water disposed of either on-site via the refinery process or disposed of off-site to appropriately licensed contractor; and
- Quarterly NSW EPA Waste Movements Reports include contaminated water disposed off-site.

Corrective Actions

- Identify, isolate and eliminate source of contamination.

4.2.5. Community Liaison

Environmental Risks

- Unidentified environmental impact from operations; and
- Business reputation.

Environmental Controls

In order to mitigate the environmental risks to the community, the following control measures will be implemented and maintained:

- The refinery is staffed, and contactable by telephone, 24 hours a day 7 days a week, enabling members of the community to contact SOR in the event of any issues or concerns;
- Continuous process monitoring and control by competent operations staff to manage process and minimise impact on the environment and community; and
- Pollution Incident Response Management Plan development and implementation to minimise risk of unacceptable impact resulting from SOR operations.

Table 13 Environmental Management Tasks: Community Liaison

Environmental Management Task	Procedure	Responsibility	Frequency
Investigate all complaints within one working day and where practical and reasonable, implement an action to correct any complaint and contact the complainant to advise them of the action that has been implemented.	WI-008 Receiving Phone Complaints	Refinery Manager/ Health, Safety, Environmental and Training Supervisor	As required
In the event of any issues or concerns raised by the public, a company representative will make a record of the following: • date and time of the complaint; • the method of the complaint • name and contact details of the complaint, if provided; • nature of the complaint; • suggested actions by the caller, if relevant; and • the action taken by SOR, including follow up contact with the complainant.		SOR personnel	As required
Record the number of complaints for the reporting period in the Environmental Protection Licence Annual return	N/A	Health, Safety, Environmental and Training Supervisor	Yearly
Record details of complaint(s) in the Annual Environmental Management Report	N/A	Health, Safety, Environmental and Training Supervisor	Yearly

Performance Indicators

- No community complaints;
- All complaints responded to within one working day; and
- No unresolved community complaints.

4.2.6. Energy

Environmental Risks

- Inefficient resource use; and
- Greenhouse gas emissions.

Environmental Controls

In order to mitigate the environmental risks associated with poor energy management, the following control measures will be implemented and maintained:

- Process efficiency optimization; and
- Inclusion of energy efficiency ratings in the Equipment Design and Installation Specification.

Table 14 Environmental Management Tasks: Energy Use

Environmental Management Task	Responsibility	Frequency
Energy use and greenhouse gas generation review and report	Health, Safety, Environmental and Training Supervisor	Yearly

4.2.7. Ground Water

Environmental Risks

The potential and actual risks to ground water as a result of site activities include:

- groundwater contamination from contaminated water stored in the pre-release basin;
- groundwater contamination from known areas of soil contamination; and
- groundwater contamination due to spills and leaks from operational areas.

Environmental Controls

In order to mitigate the environmental risks to ground water, the following control measures will be implemented and maintained:

- bunding of process and storage areas, and load transfer areas;
- maintenance of adequate spill response materials on site;
- prompt and appropriate response to spill clean-up, if they occur;
- surface sealing within process areas;
- lining of stormwater retention basin(s);
- maintenance of subsurface free-product interception sumps; and
- routine monitoring of groundwater wells across the site as shown in Attachment B.

Table 15 Environmental Management Tasks: Groundwater

Environmental Management Task	Responsibility	Frequency
Sample groundwater wells and analyse for: • Standing water Level (SWL) • Electrical conductivity • Total Petroleum Hydrocarbons (TPH) • BTEX • Phenols	Health, Safety, Environmental and Training Supervisor	Biannual
Assess groundwater quality results against performance criteria. Undertake investigation and corrective action if performance criteria exceeded.	Health, Safety, Environmental and Training Supervisor	Biannual
Record groundwater quality results for the reporting period in the EPL Annual Return	Health, Safety, Environmental and Training Supervisor	Yearly
Record groundwater quality results and provide interpretation in the Annual Environmental Management Report	Health, Safety, Environmental and Training Supervisor	Yearly

Performance Indicators

- No oil/water interface detected at aquifer surface within monitoring wells;
- No hydrocarbon odour detected within monitoring wells;
- TPH/BTEX and phenol concentrations reported < PQL;

Corrective Actions

The following corrective actions may be implemented if performance criteria are not achieved:

- Resample monitoring wells and ensure correct purging, sampling and sample handling methods are used; and
- If repeat sampling indicates on-going non-conformance, commence rigorous investigation to identify source.

4.2.8. Hazardous Materials

Environmental Risks

The potential risks include:

- air pollution;
- soil contamination;
- surface water contamination; and
- groundwater contamination due to release, spills and leaks of hazardous materials.

Environmental Controls

In order to mitigate the environmental risks posed by the storage, handling, use and disposal of hazardous materials, the following control measures will be implemented and maintained:

- surface sealing within process areas;
- bunding of process and hazardous materials storage areas, and load transfer areas;
- installation and maintenance of emission control systems;
- maintenance of adequate spill response materials on site;
- prompt and appropriate response to spill clean-up, if they occur; and
- routine monitoring of air emissions, surface water discharges and ground water.

Table 16 Environmental Management Tasks: Hazardous Materials

Environmental Management Task	Procedure	Responsibility	Frequency
Bund inspection/audit (AS1940:2004 & AS/NZS4681:2000) compliance report in Annual Environmental Report (AER)		Refinery Manager	Yearly
Routine inspection and bund water pump out	Check List	Process Operators	Daily

Performance Indicators

- Annual inspection audit finds nil non-compliances;
- Any spills or leaks contained on impervious surface within a bunded area, i.e. no soil contamination incidents; and
- Freeboard within bund maintained at 90%.

Corrective Actions

- Relocate bund contents to alternative storage bund if volumes exceed bund capacity.
- Redesign and upgrade bunding to ensure that it is appropriate to the volume of the storage vessel that it contains.

4.2.9. Meteorological Monitoring

Detailed working instructions for the monitoring of meteorological data have been produced and implemented.

Environmental Risks

The potential and actual risks to the environment from inaccurate meteorological data, include:

- inability to effectively and accurately determine whether dependant environmental effects including air quality and noise monitoring; and
- inefficient operation of the plants process systems for weather dependant processes.

Environmental Controls

The following controls have been implemented:

- installation and maintenance of an automated weather monitoring station on site which monitors and records wind speed and direction, temperature, humidity, solar radiation and sigma theta.

Table 17 Environmental Management Tasks: Meteorology

Environmental Management Task	Responsibility	Frequency
Routine download & storage of logged data from met. station	Health, Safety, Environmental and Training Supervisor	Monthly
Routine maintenance and calibration of sensors	Health, Safety, Environmental and Training Supervisor	2x Year
Review of data in response to complaints	Health, Safety, Environmental and Training Supervisor	As required

Performance Indicators

- >85% recovery of 15 minute (average) record of temperature (2 heights), solar radiation, wind speed, wind direction and sigma theta. (Legislative requirements state averaging period over one hour: NSW EPA EPL 11408 Licence, Section M5)

Corrective Actions

The following corrective actions will be implemented if performance criteria are not achieved:

- Repair and maintenance of meteorological station; and
- Secondary meteorological station.

4.2.10. Odour

Environmental Risks

The potential and actual risks that may lead to the generation of unacceptable odours include:

- emission of odours from the manufacturing plant, primarily due to failure of the plant odour control systems;
- emission of odours from anaerobic activity, predominately within bunds, sumps, gross pollutant traps and pollution control devices; and
- emission of odours arising from failure of equipment and maintenance procedures.

Environmental Controls

In order to mitigate the risk of unacceptable odour generation the following controls will be implemented:

- Installation and maintenance of vapour recovery system on the refinery process;
- Installation and optimal operation of after-burner system on the refinery process;
- Installation and maintenance of carbon canisters on process tanks;
- Routine inspections and procedures for operations and maintenance; and
- Use of odour neutralising agents.

Table 18 Environmental Management Tasks: Odour

Environmental Management Task	Procedure	Responsibility	Frequency
Routine inspection of site boundary, drains, sumps, bunds, CPI, First Flush tank, wash bay and pre-release basin for anaerobic activity and unacceptable odour generation	Odour Checklist Daily	Health, Safety, Environmental and Training Supervisor	Daily
Routine inspection of flanges, pumps, filters and other plant and equipment for leaks	Odour Checklist Maintenance	Refinery Manager	Fortnightly
Identification and rectification of unacceptable odours from process operations during routine plant inspections	Checklist	Process operators	Shift
Verification and rectification of odour complaints	WI-008 Receiving phone complaints	Health, Safety, Environmental and Training Supervisor	As required
Report odour complaint details in Environmental Protection Licence Annual Return	N/A	Health, Safety, Environmental and Training Supervisor	Yearly
Report odour complaints in Annual Environmental Report (AER)	N/A	Health, Safety, Environmental and Training Supervisor	Yearly
Determine, model and control potential odour impact of any new plant and/or equipment to ensure compliance with EPL limits	Capex Application Form	Operations Supervisor	As required

Performance Criteria

- No odour complaints

Corrective Actions

- Identification and immediate clean-up of odour generating wastes; and
- Isolation of odour generating plant and equipment until repairs completed.

4.2.11. Noise**Environmental Risks**

The potential and actual risks to the environment through excessive noise as a result of site activities include:

- disruption to neighbouring businesses and the community due to noise generated generally from site plant and equipment; and
- disruption to neighbouring businesses and the community due to noise generated by vehicles accessing the site

Environmental Controls

In order to mitigate the risk of excessive noise generation the following controls will be implemented:

- acoustic shielding of high noise generation areas of the process plant and equipment;
- contractual arrangements with suppliers ensuring that vehicles accessing the site are maintained to an appropriate standard; and
- 24 hour 7 days a week site contact availability for any community complaints or concerns.

Table 19 Environmental Management Tasks: Noise

Environmental Management Task	Procedure	Responsibility	Frequency
Identification and rectification of excessive noise sources during routine plant and equipment inspections	Checklist	Refinery Manager	As required
Monitoring of LA10 noise levels at locations (A, B & C) specified in the Environmental Protection Licence		Health, Safety, Environmental and Training Supervisor	As required
Assessment of noise monitoring results against performance criteria and development of corrective action as required		Health, Safety, Environmental and Training Supervisor	As required

Environmental Management Task	Procedure	Responsibility	Frequency
Report noise monitoring results and interpretation in Annual Environmental Report (AER)	N/A	Health, Safety, Environmental and Training Supervisor	As required
Determine, model and plan for control of potential noise impact of any new plant and/or equipment to ensure compliance with EPL limits	Capex Application Form	Operations Supervisor	As required

Performance Indicators

- No community complaints with respect to noise emission

Table 20 Timing and Location of Noise Monitoring

Location	Period	LA ₁₀ (15 minute) Limit (dB(A))
A, B & C	7am – 6pm Monday – Friday 7am – 1 pm Saturday	55
A, B & C	6pm – 10 pm Monday – Friday	45
A, B & C	All other times	40

Location of Noise Monitors

- Location A: Bomen Road, south east of the refinery
 Location B: Bomen Road, west of the refinery
 Location C: “Clearview”, north of the refinery

Corrective Actions

- Investigate any complaints and identify source of noise disturbance to verify that it is originating from these premises. Sound level frequency analysis may be required and this should be undertaken by professional acoustic consultants;
- Isolate plant or equipment responsible for excessive noise emissions until repairs completed; and
- Implement noise mitigation measures on plant and/or equipment where required.

4.2.12. Process Control and Maintenance

Environmental Risks

- Failure of process controls and/or infrastructure;
- Releases, spills and/or leaks of materials that result in contamination of air, surface water, ground water or soils;
- Emission of excessive noise;
- Emission of unacceptable odours; and
- Non-compliance with statutory conditions.

Environmental Controls

The potential and/or actual risks to the environment from the operations will be mitigated through the implementation of the following measures:

- Development and implementation of a scheduled maintenance plan;
- Development and implementation of standard operating procedures;
- Staffing by trained operators;
- Development and implementation of a risk assessment process for all activities undertaken as part of the operations;
- Development of a safety, environmental and risk aware workforce; and
- Development and implementation of this Pollution Incident Response Management Plan (PIRMP)

Table 21 Environmental Management Tasks: Process Control

Environmental Management Task	Procedure	Responsibility	Frequency
Routine inspection of plant and equipment and development and implementation of corrective action plans as required		Refinery Manager	Continuous
Inspection of bunds and compliance reporting in Annual Environmental Report		Refinery Manager	Annual
Determine and plan for control of potential environmental impact of any new plant and/or equipment to ensure compliance with statutory requirements	Capex Application Form	Refinery Manager	As required

Performance Indicators

- No environmental incidents arising from process operations or maintenance activities; and
- Environmental aspects, impacts and controls detailed in Project Plan(s).

Corrective Actions

- Isolation of plant and/or equipment posing an environmental or compliance risk.

4.2.13. Soil/Erosion**Environmental Risks**

- erosion of unsealed areas by wind or water run-off;
- contamination resulting from spills and/or leaks; and
- contamination by placement of contaminated materials on ground surface.

Environmental Controls

In order to mitigate the risks to soils the following controls will be implemented:

- sealing of majority of site;
- restriction of vehicular traffic to sealed surfaces;
- handling and storage of environmentally hazardous materials in appropriately bunded areas;
- development and maintenance of dedicated storm water management systems; and
- maintenance of vegetation on unsealed areas of site.

Table 22 Environmental Management Tasks: Soil Erosion

Environmental Management Task	Responsibility	Frequency
Routine inspection and maintenance of site vegetation	Health, Safety, Environmental and Training Supervisor	Monthly
Bund inspection	Refinery Manager	Monthly
Development and implementation of sediment control plans for projects that expose/disturb soil surface	Refinery Manager	As required

Performance Indicators

- No environmentally hazardous substances handled or stored outside bunds; and
- No soil contamination.

Corrective Actions

- Maintain areas of grass cover; and
- Relocate potentially contaminating materials to bunded area.

4.2.14. Storm Water**Environmental Risks**

The potential and actual risks to storm water as a result of site activities include:

- surface water contamination from fugitive discharges from process;
- surface water contamination due to leaks and/or spills;

- contaminated surface water leaving site and affecting downstream receptors; and generation of unacceptable odours from anaerobic surface water.

Environmental Controls

In order to mitigate the above environmental risks, the following infrastructure has been installed:

- appropriate bunding of areas where environmentally hazardous materials are handled and stored;
- maintenance of spill response materials on site;
- sealing of the majority of the site surface;
- a storm water drainage system across the site to drain surface water from non-operational areas of the site and other parts of the upstream catchment around the operational areas;
- a first flush tank and pre-release basin to capture runoff from operational areas of the site, allowing settlement of solids and increasing on-site retention time and thus reducing flow velocity to downstream creeks and reducing erosion;
- Procedures for routine inspection and management of contained surface water ; and
- Aeration of first flush/pre-release basin water.

Table 23 Environmental Management Tasks: Storm Water

Environmental Management Task	Responsibility	Frequency
Routine inspection and pump out of bunds to CPI	Health, Safety, Environmental and Training Supervisor	Fortnightly
Inspection and maintenance of pre-release basin to ensure it has 90% available capacity.	Health, Safety, Environmental and Training Supervisor	Monthly or after rainfall event
Inspection and sampling of first flush tank and pre-release basin. Water should be relatively clear, have no visible sheen and no noticeable odour. Samples should be analysed for: - pH - Electrical conductivity (EC)	Health, Safety, Environmental and Training Supervisor	After rainfall events, prior to discharge
Assessment of water quality against established performance criteria and management dependent on compliance of water quality	Health, Safety, Environmental and Training Supervisor	After rainfall events, prior to discharge

Table 24 Performance Indicators: Storm Water

Indicator	Units	Acceptance Criteria
Appearance		No visible sheen, relatively clear (low turbidity)
Odour		No noticeable odour
pH		6.5 – 9.0
EC	uS/cm	750

Corrective Actions

- Investigate and isolate source of contamination

4.2.15. Traffic Management

Environmental Risks

The potential and actual risks to the environment through traffic associated with the site, include:

- Emissions of dust from trafficked surfaces;
- emissions of exhaust fumes from vehicle exhausts;
- disruption to local traffic; and
- traffic accident possibly resulting in loss of containment.

Environmental Controls

In order to mitigate the environmental risks posed by vehicular movements to and from the site the following measures will be implemented:

- sealing of trafficked surfaces;

- contractual requirements for vehicles making deliveries to the site to be maintained in a roadworthy condition;
- streamlined traffic management system across the site to minimise traffic congestion particularly from loading and unloading of trucks;
- controlled entrances to site;
- all drivers inducted;
- emergency response plan to manage potential impacts from accidents; and
- 24 hour 7 days a week manned facility that can be contacted in the event of any community complaints or concerns.

Performance Indicators

- No community complaints with respect to traffic congestion or incidents

Corrective Actions

- Investigate and resolve failures associated with traffic incidents

4.2.16. Process Water

Environmental Risks

The potential and actual risks to the environment as a result of process water management include:

- leaks and spills of process water resulting in surface water contamination;
- leaks and spills of process water resulting in soil contamination;
- leaks and spills of process water resulting in ground water contamination; and
- increased particulate emissions from the after-burner.

Environmental Controls

In order to mitigate the risks arising from the management of process water(s) the following controls will be implemented:

- Separate process water and stormwater management systems;
- Sealing and bunding of process areas;
- Installation and manual control of first flush tank and pre-release basin;
- Corrugated-plate-interceptor (cpi) for treatment of refinery process water;
- Class 1 puraceptor stormwater treatment separator for treatment of bund waters on eastern side of the site;
- Separation of bund waters potentially contaminated with pcb/pfas material from other less hazardous bund waters;
- Use of oil absorbent canisters for treatment of accumulated bund water; and
- Monitoring of sour water.

Table 25 Environmental Management Tasks: Process Water

Environmental Management Task	Procedure	Responsibility	Frequency
Inspection and reporting of process water system and bunds	Odour checklist	Health, Safety, Environmental and Training Supervisor	Fortnightly or after significant rain event
Pump out water contained within bunds to CPI	Checklist	Health, Safety Environmental and Training Supervisor	As required
Sour water sampling and analysis for pH and Electrical Conductivity (EC)	SOR Laboratory Manual	Laboratory Supervisor	As required
Routine inspection and maintenance of Puraceptor	Puraceptor Operating and Maintenance Manual	Health, Safety, Environmental and Training Supervisor	6 monthly
Monitoring of Puraceptor oil level alarm – escalation of alarm condition to Health, Safety, Environmental and Training Supervisor	Puraceptor Operating and Maintenance Manual	Health, Safety, Environmental and Training Supervisor	Daily
Monitoring of water quality on outlet of Puraceptor		Health, Safety, Environmental and Training Supervisor	During operation of the Puraceptor

Performance Indicators

- No discharge of process water to surface water system; and
- All areas where process water generated, handled and stored are sealed and bunded

4.2.17. Waste Management

Environmental Risks

The potential and actual risks to the environment resulting from waste generation include:

- Inappropriate handling and storage of waste materials resulting in leaks and/or spill and contamination of environmental receptors such as soil, surface and ground water;
- Inappropriate segregation, classification and disposal of waste materials resulting in contamination of environmental receptors and breach of regulatory conditions; and
- Over-use of primary resources due to a lack of recycling and/or reuse of waste materials.

Environmental Controls

In order to mitigate the environmental risks associated with waste management on site the following controls will be implemented:

- Hard stands and bunded areas for the handling and storage of environmentally hazardous wastes;
- Appropriate storage and handling vessels for environmentally hazardous wastes, in accordance with manufacturers specifications and sds;
- Triple rinsing procedure for all containers prior to disposal;
- Return of waste packaging to supplier, where available;
- Segregation and classification (in accordance with nsw epa, 1998, environmental guidelines: assessment, classification & management of liquid & non-liquid wastes) of wastes generated on site; and
- Requirement to include waste management in project emp(s).

Table 26 Environmental Management Tasks: Waste

Environmental Management Task	Procedure	Responsibility	Frequency
Allocation (including signage) of designated containers and locations for segregation and storage of wastes		Refinery Manager	As required
Classification of waste streams in accordance with NSW EPA Guidelines		Health, Safety, Environmental and Training Supervisor	As required
Ensure handling, storage and disposal of wastes is in accordance with manufacturers' specifications, SDS and regulatory requirements.		Refinery Manager; Quality Manager; Health, Safety, Environmental and Training Supervisor	Daily
Prepare and submit annual Waste Movements Report to NSW EPA	EPL 11408	Refinery Manager	Yearly
Review and report on waste generation and disposal details in the Annual Environmental Report (AER)	N/A	Health, Safety, Environmental and Training Supervisor	Yearly

Performance Indicators

- No environmental contamination resulting from waste management activities;
- All generated wastes classified in accordance with NSW EPA Guidelines and segregated accordingly;
- Licensed contractors and treatment facilities used for the transportation and disposal of Group A, Industrial and Hazardous wastes.

Corrective Actions

- Employee and contractor induction and/or training.

Section 5: Monitoring and Review

5.1. Environmental Monitoring

The SOR Environmental Management Review Board will meet at least every three (3) months to review the effectiveness of the environmental controls and activities implemented at the site. To ensure that all of the controls, activities and performance indicators are reviewed the review meeting will follow a set agenda, which will take the form of a checklist. The review should identify and record any follow-up actions where it has been established that the environmental controls and activities are not achieving the set performance criteria. Minutes from these meetings will be recorded and kept on file and will be displayed on internal noticeboards and reported through to the senior management team.

5.2. Environmental Auditing

In general every year an audit of the PIRMP's implementation and effectiveness will be undertaken. The audit will highlight existing and potential environmental exposures and will generate corrective actions to ensure continual improvement in environmental performance. Any recommendations proposed by the audit are to be considered to ensure risk to the environment is minimised and SOR is protected from legislative and policy breaches. The audit will be considered as a management tool for recognising and assessing environmental risk that can assist in developing strategies that minimise risk and improve environmental performance. The results and recommendations of the audits, where applicable, will be incorporated in this PIRMP by the Health, Safety, Environmental and Training Supervisor.

To ensure auditing of the PIRMP is both comprehensive and functional, it will:

- Be consistent with *ISO 14010 – Guidelines and General Principles for Environmental Auditing*, and *ISO 14011 – Procedures for Environmental Auditing*, or updated versions of these guidelines/manuals;
- Be systematic and structured. All relevant aspects of operations at the facility need to be identified and included at an agreed level of detail in the audit;
- Be verified by supporting documentation. If evidence generated by the audit is not verified, the process is then considered a review – not an audit;
- Be periodic in nature and not merely an isolated exercise. The audit period may range from between six months and five years depending on SOR's requirements and the level of environmental risk being assessed;
- Be well documented so that it may be verified that it has been undertaken properly. The audit must be finalised with a written report of the assessment;
- Be objective;
- Measure the level of environmental risk that operations at the facility pose on the environment and humans, and devise strategies to minimise that risk. A fundamental part of the audit recommendations is to prioritise actions to minimise identified environmental risks; and
- Identify areas where SOR is potentially non-compliant with regulatory requirements.

5.3. Corrective Action

Where there has been a non-compliance with an environmental control or an environmental incident the matter will be investigated by representatives of the management team to determine the root-cause of the failure and the appropriate corrective actions to be implemented to minimise the risk of on-going noncompliance, where appropriate expert advice will be sought as part of any investigation and corrective action planning.

The standard SOR Incident Report Form (Attachment E) will be used to record the details of any non-compliance or incident, the findings of the investigation and the corrective actions proposed and those implemented/completed.

5.4. Environmental Management Plan Review

This Plan will require amendment from time to time to ensure that the information contained within it is current and correct. Amendments may be made under various circumstances including:

- Personnel changes;
- Work practice changes;
- Environmental safeguard and management strategy variations;
- Introduction of a new hazardous processes and/or substances; and
- Amendments found to be necessary as a result of incidents, audits, risk assessments or simulated emergency exercise.

Notwithstanding those amendments resulting from the changes described above, this Plan will be reviewed every 5 years by the SOR Management Team. Any amendments to this Plan will be communicated to the workforce and other affected parties by controlled document Plan updates and through regular Communication Meetings and/or written memos.

References

Australian and New Zealand Environment and Conservation Council (ANZECC), 2000, *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*.

Department of Environment and Conservation, 2007, *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

Department of the Environment, Water, Heritage and the Arts. 2010. National Pollutant Inventory. Retrieved on 9th August 2010 from <http://www.npi.gov.au/reporting/index.html>

NSW Department of Planning, 1993, *Hazardous Industry Planning Advisory Paper, No. 5 Hazardous Guidelines* 21 pages.

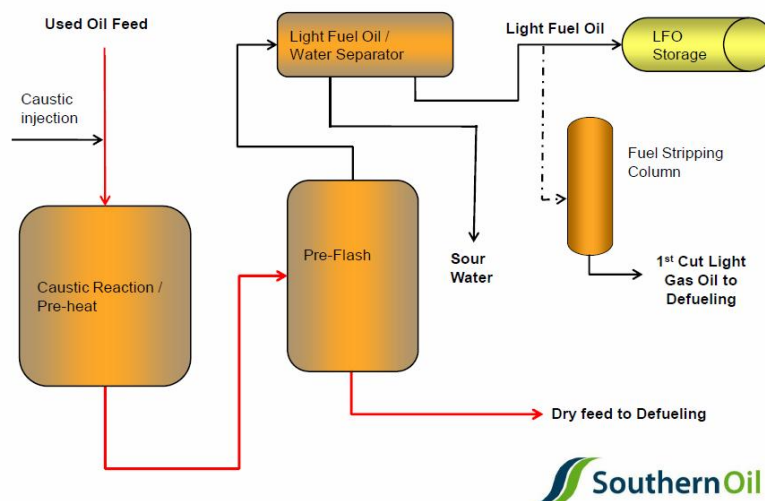
NSW Environmental Protection Authority, 1998, *Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-liquid Wastes*

Patrick James and Associates, 1997. Environmental Consultants.

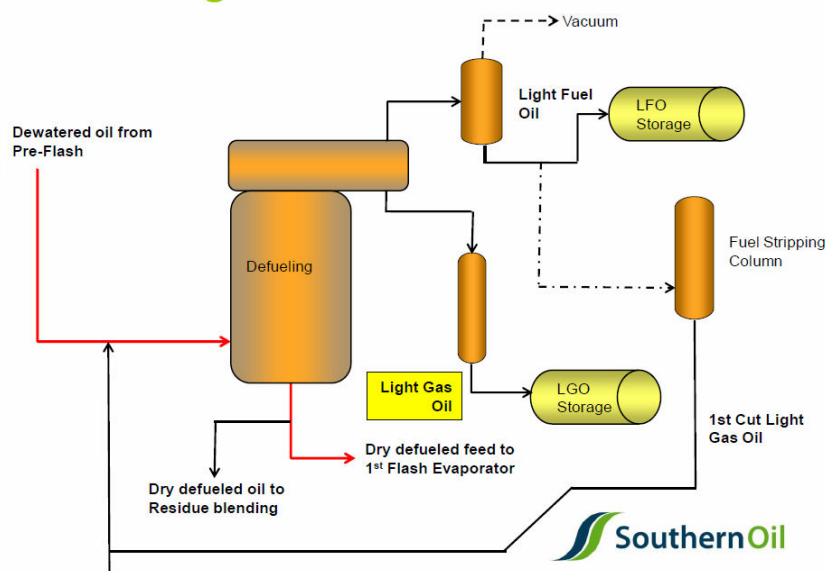
Appendix

Attachment A: Process Diagram

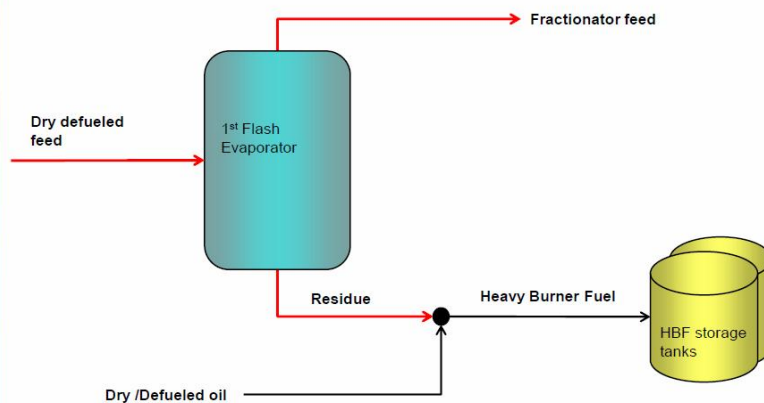
Caustic Reaction & Dewatering



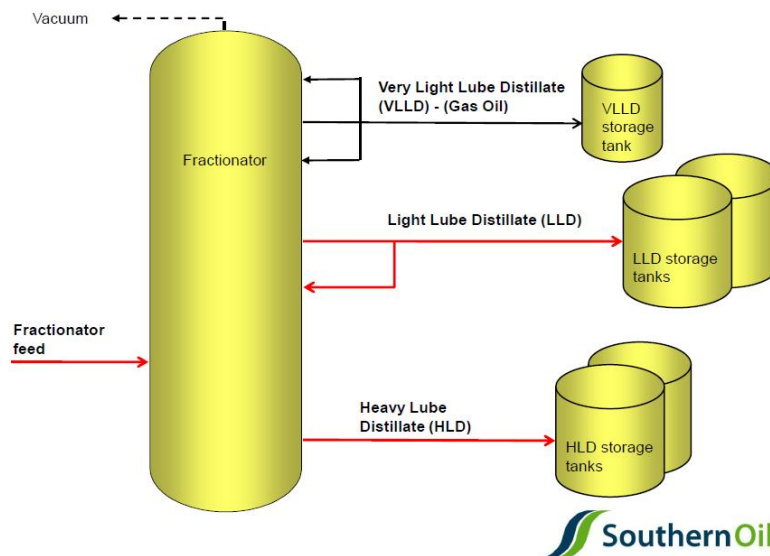
Defueling



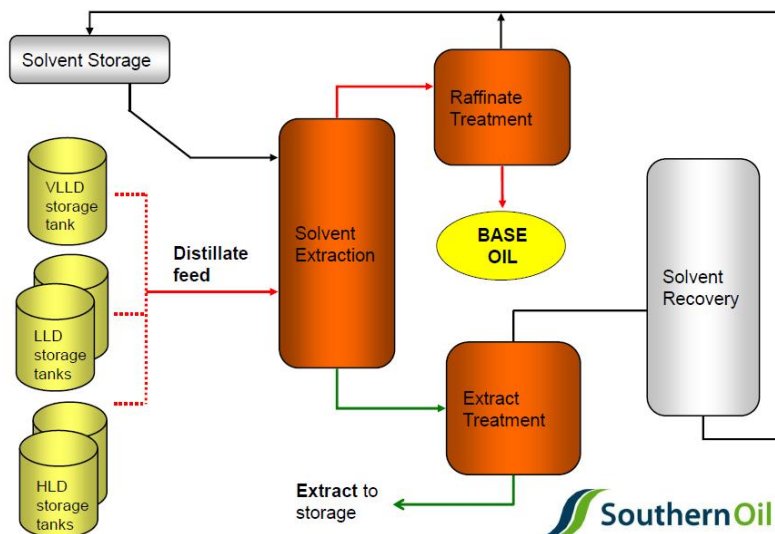
Flash Evaporation



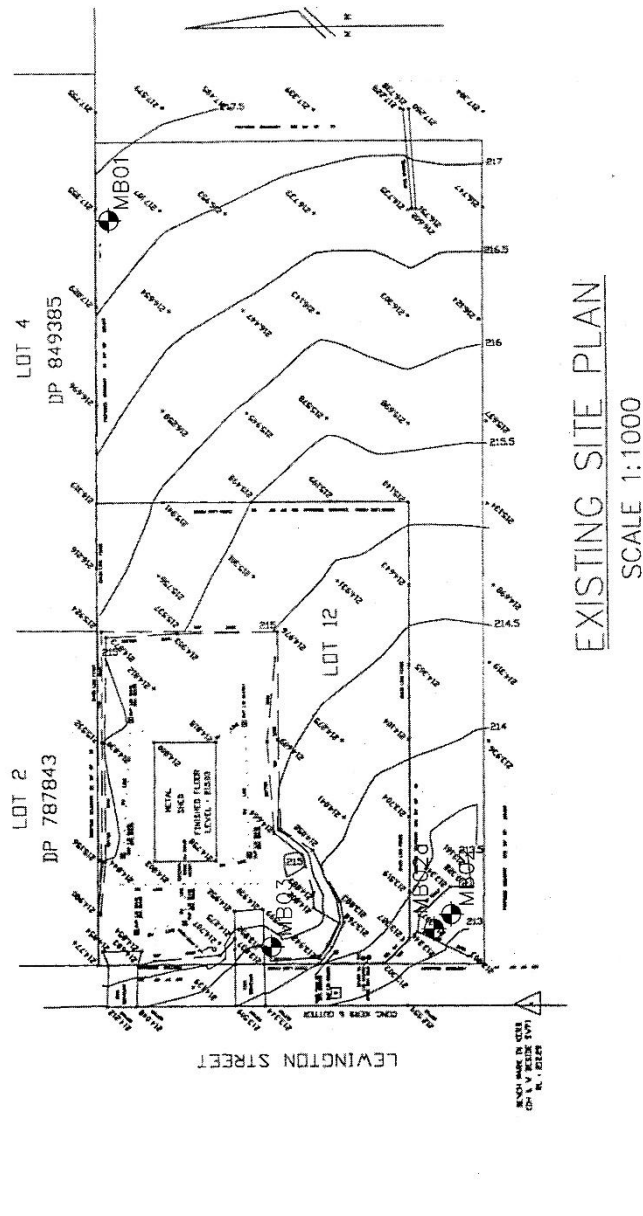
Fractionation

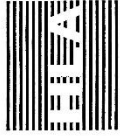


Solvent Treatment



Attachment B: Environmental Monitoring Locations



 HLA - Envirosciences Pty Ltd Level 1, 305 Queensberry Street North Melbourne, VIC, 3051 (03) 9328 5533 DRAWN: DW	SITE PLAN & GROUNDWATER CONTOURS SOUTHERN OIL REFINERIES 42 Lewington Street, Bomen		FIGURE 1
	PROJECT-TASK NUMBER M1113	APPROVED DATE July 2001	REVISED DATE

Attachment C: Environment Protection Licence

For latest copy of the Environment Protection Licence (11408) please see the following website
<https://apps.epa.nsw.gov.au/prpoeoapp/default.aspx>

Attachment D: Development Consent

Current Development Consent DA 970081; Approved: 11-10-2000

A	Air pollution / Odours as EPA Licence	
B	Cannot store/refine/handle PCB contain materials	
C	Continuous recording of incinerator O ₂ levels and temperature	
D	Site Management Plan Protocols	Oil receipt, acceptance, storage.
E	Site management plan to be independently assessed	Waste storage and disposal; Testing Facilities accreditation; Operations and training/ Experience; Environmental auditing and reporting; and Air emissions and spillage.
F	Iso-kinetic air samples as agreed with WWCC to be purchased.	
G	Access to a device to measure (NATA certified):	chlorinated hydrocarbons, heavy metals, herbicides/pesticides
H	No operation without afterburner / scrubber	
I	Afterburner to allow thermal input and air:fuel ratio without affecting residence time	> 1 second
J	Noise limit < 5dB(A) 5m from any residence	
K	minimise noise and dust during construction	
L	Report all waste movements to council	Every 12 months
M	Insurance to cover insolvency	
N	Hazard studies	Fire Safety
O	Emergency plan / safety Management System	HAZOP
P	Incident reporting to Dept of Urban Affairs and Planning	Final Hazard Analysis
Q	Hazard Audit (twelve months after HAZOP)	Construction Safety Study
R	Compliance with submissions to DG Dept of Urban Affairs and Planning	
S	150 mm reinforced footpath crossings (max width 6 metres)	
T	Paving of driveways to be hot mix or 125mm reinforced concrete (also W)	150mm compacted gravel + 3 coats bitumen
U	Site plan showing paving, sewers, drainage	
V	Plumbing permit	
X	Subject to trade waste policy	
Y	no flared driveways	
Z	Stormwater: 1 in 10 year incident	
AA	Only clean water to storm water	
BB	Annual bund permeability study to WWCC	Permeability of bunds 1X10 ⁻⁹ metres / second
CC	Seven car parks	
DD	loading and unloading to occur on site	
EE	Landscaping plan to WWCC	
FF	Disabled access and facilities	
GG	External walls 1.5m from boundary 90/90/90 fire resistance	
HH	Constructions on footpaths prohibited	
II	Respect all national park and Aboriginal heritage conditions and requirements	
JJ	Erosion and sediment control plan	
KK	Installation of Piezometers	As per Licence
DA05/0066		
PS1	Continued Compliance with all existing DA consents	Amended 970081A1 excluding construction specific issues
PS2	Contain all surface waters via 1st flush	
PS3	Remove 2nd driveway	ES3 - redundant guttering repaired
PS4	Comply with EPA (licence) and Clean air regs 2002	
ES1	150 mm reinforced footpath crossings (max width 6 metres)	ES2 - Comply with WWCC
EH2	All solid waste to be disposed of accordingly	

Attachment E: Incident Report Form

For latest version please see Document system



Environmental Protection Agency (EPA) / Public Complaints

Complaint Occurred:	Click or tap to enter a date.		Time: Click or tap here to enter text.
Message Received:	Click or tap to enter a date.		Time: Click or tap here to enter text.
What was the source of the complaint:	Choose an item.		
Complaints Name:	Click or tap here to enter text.		
Location:	Click or tap here to enter text.		
Telephone Number:	Click or tap here to enter text.		
Details of Complaint:	Click or tap here to enter text.		
Refinery Conditions at the Time of Complaint:	Click or tap here to enter text.		
Weather Data:	Wind Direction: Choose an item.	Wind Speed: Choose an item.	Conditions: Choose an item.
Did you ring the complainant back?	Yes / No: Choose an item.	Time: Click or tap here to enter text.	
Report Compiled by:	Click or tap here to enter text.		Date: Click or tap to enter a date.
Optional Picture Attachment:			

Attachment F: Environment Policy

Southern Oil Refineries Pty Ltd recognizes the need to protect the environment and for its employees and contractors to be provided with a safe and healthy place in which to work. It is the policy of this company to make every reasonable effort in areas of environmental protection, accident prevention, injury protection and promotion of the health, safety, and welfare of all contractors and employees.

The following areas of responsibility are essential to ensure the successful implementation of this policy.

MANAGEMENT will:

- Observe and enforce the relevant environmental acts and regulations and provide education and instruction for all employees and contractors to ensure the protection of the environment.
- Observe and enforce the relevant acts and regulations that apply to working conditions in our work sites encompassing administration, laboratory, and plant areas.
- Undertake to provide a safe and healthy working environment for all employees and contractors.
- Provide education and instruction in the correct use of all equipment and materials used in our operations.

SUPERVISORS are responsible for environmental protection, safety, health and working conditions of all employees and contractors under their control and are required to:

- Provide information and instruction to employees and contractors on environmental matters.
- Provide information on health and safety matters to employees and contractors by way of instruction.
- Provide initiative and follow-up action on all matters concerning health and safety.
- Ensure work hazards are reported as they are observed.

EMPLOYEES are expected to have a positive attitude toward safety and protecting the environment, and willingly co-operating in the objectives of making their workplace a healthy and safe workplace and therefore:

- Are required to observe and practice work methods that prevent risk to the environment.
- Observe and practice safe work methods helping to prevent injuries and illness.
- Stop work immediately if risk to the environment or an unsafe condition is observed.
- Immediately report any unsafe work condition or equipment to their supervisor.
- Where safety equipment is provided, to ensure it is used correctly and is in a serviceable condition at all times.
- Immediately shut down operations if risk to the environment may occur or an unsafe condition is detected or suspected.

Signed	
Date	
Refinery Manager	Badyn Cook