

**FUCHS LUBRICANTS (AUSTRALASIA) PTY LTD**

**40 ELWELL CLOSE**

**BERESFIELD, N.S.W. 2322**

**POLLUTION INCIDENT RESPONSE  
MANAGEMENT PLAN**

**ENVIRONMENT PROTECTION LICENCE No.20862**

**PUBLIC VERSION**

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# 1 INTRODUCTION

## 1.1 FACILITY DETAILS

The facility details, as defined in the Environment Protection Licence 20862 are summarised in Table 1:

<b>Company:</b>	Fuchs Lubricants (Australasia) Pty Ltd
<b>Environment Protection Licence (EPL) No.:</b>	20862 (Issued 20/07/2017)
<b>Schedule Activities:</b>	Petroleum products and fuel production
<b>Facility Name &amp; Address</b>	Fuchs Lubricants 40 Elwell Close Beresfield, NSW 2322

Table 1: Facility details

## 1.2 OVERVIEW OF OPERATIONS

The premises and facilities associated with EPL 20862 are owned and operated by Fuchs Lubricants (Australasia) Pty Ltd (FLA).

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

FLA specializes in five main areas of lubrication:

- Automotive
- Industrial
- Specialist applications, including open gearing
- Mining
- Genuine brands

Manufacturing facilities are located in Melbourne and Newcastle, all with ISO 9001, ISO 45001 and ISO 14001 accreditation. Both sites have individual distribution, research & development (R&D) and quality control capabilities. The Perth sites holds ISO9001, ISO 45001 and ISO 14001 accreditation with no research & development (R&D) or quality control capabilities. The Newcastle sites specializes in mining lubricants. EPL20862 covers the premises and facilities in Beresfield (Newcastle, NSW).

The production process at this site involves the importation of base oils and raw materials, some of which are dangerous goods, which are then used to manufacture lubricants (finished product) in blending tanks on site. Finished product is transferred into bulk tankers or packaged into a number of different sized containers ranging from 1L to 1000L. Packaged goods are warehoused onsite and then distributed across the country by third party freight contractors. Imported base oils and finished products are also stored onsite in bulk or swing tanks, of which largest tank has a maximum capacity of 180,000L.

Waste oily product as part of the manufacturing process is collected in IBCs on site which are collected regularly by waste transporter(s) as industrial waste. Any material that collects in the bunded areas (e.g. due to a spill) is pumped in to the trade waste pit to be pumped off site through the trade waste system.

### 1.3 PLAN OBJECTIVES

This Pollution Incident Response Management Plan (PIRMP) has been developed in accordance with the requirements of the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulations 2021 (POEO(G) Regulations)

The objectives of the plan (as in the *Environmental guidelines: Preparation of pollution incident response management plans*) are to:

- Ensure timely and comprehensive communication about a pollution incident on site to all staff at the premises and head office (Melbourne), the Environmental Protection Authority (EPA), other authorities and the community who may be affected by the impacts of the pollution incident.
- Minimize and control the risk of a pollution incident at the premises by identifying any environmental risks that are present and develop action plans to minimize and manage those risks.
- Ensure the plan is implemented by trained employees, identify and train employees responsible for its implementation, and ensure the plan is regularly tested and modified where required to its effectiveness. Refer to Appendix G (SAFE059).

## 2 HAZARD/POLLUTION IDENTIFICATION

### 2.1 POLLUTANT INVENTORY

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

### 2.2 HAZARD IDENTIFICATION & ASSESSMENT

The definition of a pollution incident is: *pollution incident* means an incident or set of circumstances during or as a consequence of which there is a likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on a premise, but it does not include an incident of circumstances involving the emission of any noise.<sup>1</sup>

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as<sup>1</sup>:

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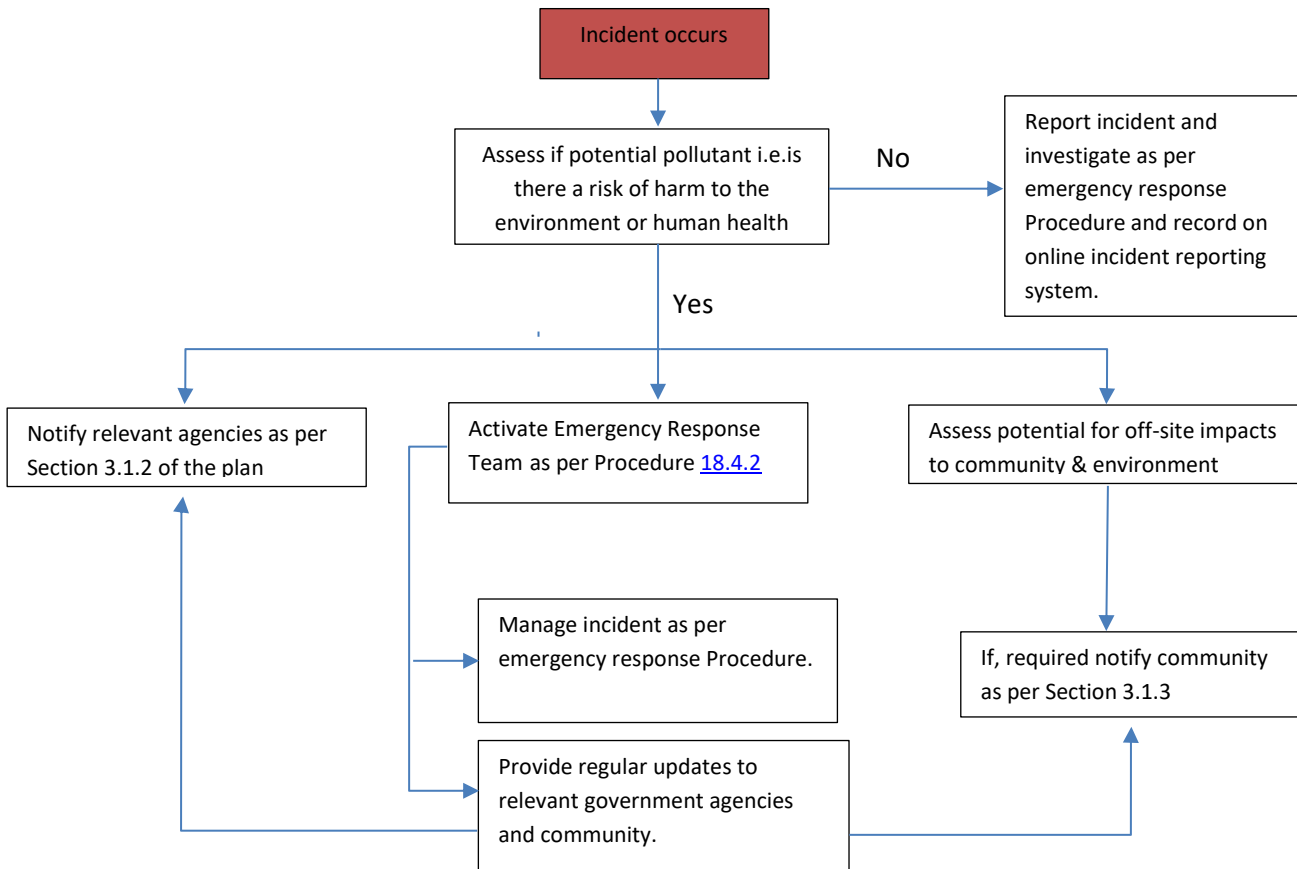
<sup>1</sup> *Environmental guidelines: Preparation of pollution incident response management plans* (Available on the NSW EPA website).

- 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 the ecosystems that is not trivial, or
  - ii. It results in actual or loss of property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such amount as is prescribed by the regulations), and
- 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.

An assessment of the site was undertaken to identify the main hazards to human health or the environment associated with the activity undertaken on site. This assessment lists pollution incidents with potentially adverse consequences and details the event or likely cause, consequence, response controls and risk rating of the consequences.

### 3 INCIDENT RESPONSE

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



### 3.1 COMMUNICATION

#### 3.1.1 Internal Communication (i.e. Employees/Contractors/Visitors)

All incidents are to be reported immediately to the Supply Chain and Operations Manager.

#### 3.1.2 Government Agencies

They key contacts associated with the implementation/activation of this plan are listed below.

If a pollution incident occurs where ‘material harm’ to the environment is caused or threatened, the notification protocol set out in section 3 (above) is followed.

If the incident presents an immediate threat to human health or property, call 000.

If the incident does not require an initial combat agency, immediately notify the authorities in the order listed below.

External Agencies	
Ambulance, Fire or Police	000
Environment Protection Agency	131 555
Work Cover Authority	13 10 50
Newcastle City Council	02 4974 2000
Hunter Water Corporation	1300 657 000
Ministry of Health (Newcastle)	02 4924 6477 (diverts to John Hunter Hospital)- ask for Public Health Officer on call

#### 3.1.3 Local Community

Community stakeholders that are potentially affected by a potential incident will be notified immediately by phone call after being instructed by one of the key contacts for the site. As detailed in the emergency response procedure any incident is to be communicated to the immediate neighbours. The communication method may change depending on the nature of the event or as directed by the relevant agency. Regular updates if required will be provided to the affected community throughout the course of event by one of the key contacts.

### 3.2 On-Site Incident Management

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

## 4 ADMINISTRATION

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

### 4.1 STAFF AWARENESS/TRAINING

All new staff will be made aware of the requirements of this plan and the emergency response procedures as part of their environmental induction with the Environment Manager.

Staff in the warehouse, laboratory and production areas must attend annual spill kit training to ensure they are able to contain a spill and raise the alarm where required.

### 4.2 PLAN AVAILABILITY

In accordance with Section 153D of the POEO Act, the plan will be made available to all site employees via the intranet. A hard copy of the plan will also be available at the site in the emergency information box.

### 4.3 TESTING OF PLAN

An annual environmental spill drill and/or annual spill training will be conducted to ensure that the information contained within the plan and the emergency response plan is accurate and up to date. Drills will be carried out and findings documented on the online incident reporting system.