

# Pollution Incident Response Management Plan

## 1. Purpose

This procedure outlines the steps to manage a pollution incident (generally a chemical spill) in order to minimise the potential for injury and damage to the environment. This plan is prepared to ensure the compliance to the relevant requirements in the Protection of the Environment Operations (POEO) Act and Environment Operations (General) Regulation 2022 (the General Regulation). This plan should be reviewed and tested at least once a year and immediately after any incident that requires this procedure being enacted.

This PIRMP has been developed in conjunction to CRC's Emergency Response Plan (ERP), Emergency Evacuation Procedure, and Spill Response Procedure.

## 2. Scope


The procedure applies to any event that results in the uncontained spill of a hazardous substance within the CRC Industries manufacturing facility located at 9 Gladstone Rd, Castle Hill, NSW 2154.

ABN No: 77 000 725 833

## 3. Definition

PIRMP	Pollution Incident Response Plan
EPA	Environment Protection Authority
Pollution Incident	An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or sets of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.
Material Harm	<p>(a) Harm to the environment is material if:</p> <ul style="list-style-type: none"><li>i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that are not trivial, or</li><li>ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs</li></ul> <p>(b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or cause good harm to the environment.</p>

The definitions above are based on the Dictionary of the POEO Act

	Pollution Incident Response Management Plan	Effective Date: June 2025	Version: 18	Page 1 of 27
	Printed documents are uncontrolled			

#### 4. PIRMP Requirements Guidelines

Based on Section 72 of the General Regulation 2022, PIRMP must include:

Section	Detail required	Related information in this document
(a)	A description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),	Section 5
(b)	the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,	Section 5
(c)	details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,	Section 6
(d)	an inventory of potential pollutants on the premises or used in carrying out the relevant activity,	Section 7 Appendix 1
(e)	the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,	Section 7 Appendix 1
(f)	a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,	Section 8
(g)	the names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the PIRM plan, and (ii) are authorised to notify relevant authorities under the Act, section 148, and (iii) are responsible for managing the response to a pollution incident,	Section 9
(h)	the contact details of each relevant authority referred to in the Act, section 148,	Section 9
(i)	details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the license relates or where the scheduled activity is carried on,	Section 11
(j)	the arrangements for minimising the risk of harm to people who are on the premises or who are present where the scheduled activity is being carried on,	Section 11
(k)	a detailed map, or set of maps, showing the location of the premises to which the license relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,	Section 12 Appendix 2,3,4,5,6
(l)	a detailed description of how an identified risk of harm to human health will be reduced, including, as a minimum, by early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,	Section 5,6,7,8,14
(m)	the nature and objectives of a staff training program in relation to the PIRM plan,	Section 14
(n)	the dates on which the PIRM plan has been tested and the name of the person who carried out the test,	Appendix 7
(o)	the dates on which the PIRM plan is updated,	Appendix 7
(p)	the way in which the PIRM plan must be tested and maintained.	Section 15



## 5. Potential Hazard

Potential hazards at the premises are:

- Toxic or explosive atmosphere build up during manufacture.
- Static electrical charge build up.
- Underground storage tanks leaking into surrounding soils and strata.
- Pumps that relay product from underground tanks to the production plant leaking.
- Propellant tanks leaking to atmosphere.
- Bulk containers of chemicals spilling in transit onsite.
- Bulk deliveries from tankers leaking onsite.
- Bulk stored containers of chemicals on site.
- Hoses and pumps leaking.
- Finished goods in transit store leaking.
- Spills onsite entering stormwater that may enter a local creek.
- Power failure.
- Natural disasters, such as bushfires, floods, or major storm events
- Fire


All potential hazards at CRC have been carefully identified, and where possible, controls have been put in place to minimise the risks. Supporting documents are as follow:

- Risk Assessment Register.
- Safe Work Method Statement (SWMS).
- Safety Data Sheet (SDS).

These documents are available on CRC's compliance software, ISOPro.

## 6. Pre-emptive Actions

- Toxic or explosive atmosphere build up during manufacture – Wherever there is a possibility of an occurrence thru mechanical failure or other cause, the following measures are in place:
  - Gas detection with audible and visual indication is in place
  - Automated shutdown of electrical equipment is activated
  - Powered extraction with fresh air change-over is in place
- Static electrical charge build up:
  - Staff have been provided with cotton uniforms and Electric Static Dissipative footwear
  - ESD Testing station installation
  - Staff have been trained in Static Awareness (Recorded in the Compliance Software)
  - All machinery is connected back to a common grounding point
  - All blending tanks are connected back to a common grounding point
  - All blending tanks are filled from the base
  - All blending hoses are inspected and tagged yearly
  - All blending vessels are inspected and tagged yearly
  - Tanker bonding is on site and a procedure is in place that ensures tankers are bonded prior to connection for unloading

	Pollution Incident Response Management Plan	Effective Date: June 2025	Version: 18	Page 3 of 27
	Printed documents are uncontrolled			

- Underground storage tanks leaking into surrounding soils and strata:
  - Monitoring wells are checked (and recorded) for signs of hydrocarbons every six months
  - Monitoring wells are checked (and recorded) for depth every six months
  - Underground tanks are integrity tested every 5 years by a certified third party
  
- Pumps that relay product from underground tanks to the production plant leaking:
  - Pumps are in a resin bunded area
  - Pump bunding has a rain cover to stop build-up of rainwater
  - Pumps are included in a regular maintenance program
  - Pumps are behind a locked gate with a “code 003” fire and rescue lock
  
- Propellant tanks leaking to atmosphere:
  - LPG Tanks undergo an external inspection bi-annually by a certified third party
  - CO<sub>2</sub> Tank is inspected annually by the provider
  - LPG Tanks undergo an internal vacuum test and inspection every 10 years by a certified third party
  - A gas detection system is installed around the tank farm perimeter that shuts all electric, pumps and valves down if a leak is detected
  - The gas detection system is calibrated every three months by a certified third party
  
- Bulk containers of chemicals spilling in transit onsite:
  - Multiple Spill Kits are available at strategic locations on site and are inspected weekly
  - Drain covers available on site
  - All staff are regularly trained in spill response actions
  - Site has drain intercept point which can be quickly shut at any time (Appendix 3)
  - Bulk Chemical Delivery (Tanker Unloading) Procedure
  
- Bulk deliveries from tankers leaking onsite:
  - A procedure and checklist are in place that requires drain mats be placed over drains prior to any tanker connecting to our site
  - Multiple Spill Kits are available at strategic locations on site
  - All staff are regularly trained in spill response actions
  - Site has drain intercept point which can be quickly shut at any time (Appendix 3)
  - Bulk Chemical Delivery (Tanker Unloading) Procedure
  
- Bulk stored containers of chemicals on site, Hoses and pumps leaking and Finished goods in transit store leaking:
  - All chemicals are contained in bunded spaces and are segregated if they are non-compatible
  - All filling and blending areas are bunded to contain the maximum spill requirements of quantity of product for that area
  - Hoses and pumps are only used in bunded areas

Finished goods are picked up on a daily basis to reduce risk and all finished flammable goods onsite are stored to meet Safe Work Australia Guidelines at the end of the production shift. Aerosols are all caged and flammables stored in Flammable Goods Cabinets or respective Dangerous Goods Class Stores

- Spills onsite entering stormwater that may enter a local creek:
  - Multiple Spill Kits are available at strategic locations on site
  - All staff are regularly trained in spill response actions
  - Site has drain intercept point which can be quickly shut at any time (Appendix 3)
  - Chief fire warden trained for relevant incidents
- Fire:
  - Staff trained with the use of fire extinguishers, training conducted by Fire & Rescue NSW bi-annually
  - All firefighting equipment is tested and tagged by a certified third party every six months
  - All equipment in Zone 1 Hazardous areas is flameproof and intrinsically safe
  - Gas Detection and shutdown systems are installed in all Zone 1 Hazardous areas
  - Gas Detection Systems are calibrated every three months by a certified third party
  - Thorough static controls are in place throughout the production area
  - Annual Fire Safety Statement is supplied for the site to council yearly
- Regular inspections:
  - Daily Shut Down Checklist (all working days)
  - Daily Forklift Inspection (all working days)
  - Office WHS Inspection (monthly)
  - Production WHS Inspection (monthly)
  - PPE Inspection (weekly)
  - Emergency eyewash and shower Inspection (weekly)
  - Bulk Chemical Delivery Checklist (on every bulk chemical delivery)
  - Bulk Propellant Delivery Checklist

All pre-emptive actions are scheduled as scheduled activities, and all records are maintained in our compliance software or in local network folders.

## 7. Inventory of Pollutants


CRC receipts, stores, handles, and uses a large number and range of chemicals. There are several comprehensive systems used at CRC to ensure safe handling are always in place. The systems include:

- Safety Data Sheets always available (soft and hard copies)
- Dangerous Goods and Hazardous Substances Manifest and Notification Report (provided to SafeWork NSW)
- Regular staff training
- Workplace inspections
- Safety and quality audit

Appendix 1 provides a list of pollutants at the premises.

## 8. Safety Equipment

- Spill kits are located strategically around the site. Staff are regularly trained in the proper use of these spill kits and reporting of spills. Spill kits are maintained regularly.
- PPE, including safety glasses, ear plugs, respirator, gloves, protective clothing, etc

	Pollution Incident Response Management Plan	Effective Date: June 2025	Version: 18	Page 5 of 27
	Printed documents are uncontrolled			

- Bulk Chemical Delivery Checklist – to ensure drain intercept is closed and drain mats are used prior to any tanker unloading
- SDSs for all raw materials are in the first aid room in hard copy form and in our compliance software (for soft copy)
- SDSs for all raw materials and finished goods are in the Hazmat Box (in USB Stick)
- Gas detection shutdown and warning systems are in place in all hazardous areas
- Fire panel has been fitted to the building with detection in all hazardous areas, offices and roof cavities
- The site is Bunded and all drainage on site is directed through a drain intercept that can be easily closed at any time (See appendix 3)
- Firefighting equipment is installed at strategic locations around the site (See appendix 3)
- Eyewash and Emergency Showers are installed around the site (See appendix 4)

## 9. Contact Details

For **DIRECT mobile contact** numbers Call **Calamity Security on 1300 300 247** and advise them that the PIRMP needs to be enacted.

Castle Hill Production	Contact
Environment Health & Safety Officer	Reuben Etuale Office direct: (02) 9849 6731 Email: reuben.etuale@crcind.com
Chief Fire Warden	Colin Gurney Office direct: (02) 9849 6728 Email: colin.gurney@crcind.com
Director of Operations and Supply Chain, AsiaPac	Shakaar Ramdhin Office direct: (02) 9849 6725 Email: Shakaar.Ramdhin@crcind.com

Regulatory Bodies	Contact
Environment Protection Authority (EPA)	131 555 <a href="http://www.epa.nsw.gov.au/reporting-and-incidents/incident-management/reporting-and-managing-incidents">www.epa.nsw.gov.au/reporting-and-incidents/incident-management/reporting-and-managing-incidents</a>
Fire & Rescue NSW	In an Emergency Call <b>000</b> Hazardous Materials Response 50 Lancaster St, Ingleburn 2565 Tel: (02) 9605 5702
SafeWork Australia NSW	13 10 50 <a href="http://www.safework.nsw.gov.au/notify-safework/incident-notification">www.safework.nsw.gov.au/notify-safework/incident-notification</a>

<b>NSW Health</b>	<b>(02) 9391 9000</b> <a href="http://www.health.nsw.gov.au">www.health.nsw.gov.au</a>
<b>The Hills Shire Council</b>	<b>Health &amp; Environmental Protection</b> <b>(02) 9843 0555</b> <a href="https://www.thehills.nsw.gov.au">https://www.thehills.nsw.gov.au</a>

## 10. Communication with Neighbours and Local Community

- CRC Industries is located on a corner block in an Industrial area. The closest neighbours are a building that's owned by "**Australian Pump**" who is located to the East along Gladstone Road, and "**Usana**" who is located to the North along Hudson Avenue. Both neighbours would be considered "Down Hill" in a geographical sense. There are no Hospitals, Nursing Homes, Schools, or pre-schools within a kilometre of the Factory. There are, however, food shops, a bowling alley and other factory units. In the event of a major incident, the chief fire warden or person in charge will delegate the task of communication with the neighbouring businesses.
  - Building owned by Australian Pump, 7 Gladstone Rd Castle Hill – 02 8865 3500
  - Usana, 3 Hudson Ave Castle Hill – 02 9842 4600
- Communications with the community and or media would be made by the Trans-Tasman Head of Marketing
- **For DIRECT mobile contact** number Call **Calamity Security on 1300 300 247** and advise them that the PIRMP needs to be enacted.

<b>Trans-Tasman Head of Marketing</b>	<b>Kieran Chapman</b> <b>Office Direct: +64 9272 2702</b> <b>Email: <a href="mailto:kieran.chapman@crcind.com">kieran.chapman@crcind.com</a></b>
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## 11. Minimising harm to persons on the premises

CRC has implemented the below processes/measures in the effort to minimise and prevent harm to persons on the premises:

- Emergency Response Plan (ERP)  
Should an incident occur, that could possibly harm or put at risk any personnel at CRC at the time, the alarm will be activated and as per our “Emergency Response Plan”. All staff not involved with the Emergency Response Duties will immediately evacuate the premises and muster at the flag poles on the corner of Gladstone Rd and Hudson Avenue.  
Emergency procedure is outlined in Section 2 of the ERP
- Implementation of SOP, Safe Work Method Statement (SWMS), and risk assessment  
Appropriate training using SOP, SWMS, and risk assessment matrix are provided to staff
- Provide the required PPE  
PPE and basic clean-up resources are always available at the premises
- Pre-Emptive actions as outlined in Section 6

If anyone at CRC premises need any urgent medical help/advice/toxicology consultation, below are the contact numbers:

- If there is a need for urgent medical help, DIAL 000
- If there is a need for Medical Advice, Contact “Poisons Information 24-hour Hot Line” on **13 11 26** and have the appropriate SDS handy.
- If there is a need for expert consultation on Toxicology or environmental impact, contact John Sokolich on +64 9272 2712
- **For DIRECT mobile contact** number Call **Calamity Security on 1300 300 247** and advise them that the PIRMP needs to be enacted.

<b>R&amp;D Consultant</b>	<b>John Sokolich</b> <b>Office Direct: +64 9272 2712</b> <b>Email: john.sokolich@crcind.com</b>
<b>Trans-Tasman Technical Manager</b>	<b>Natasha Gill</b> <b>Office Direct: + 64 2156 5713</b>

## 12. Maps

Maps are shown in the appendix section as listed below.

- Appendix 2 – Location of Site
- Appendix 3 – CRC Site Map (includes: Drainage & Stormwater Drain Intercept Point and Emergency Response Equipment)
- Appendix 4 – Emergency Eyewash & Shower Locations
- Appendix 5 – Location of Potential Pollutants
- Appendix 6 – Storm Water Entry to Local Creek

### 13. Actions to be taken during or immediately after a pollution incident

The major vs and minor spill are determined based on the table below:

Material Type	Spill Quantity				
	1 -20 L	20 - 100 L	100 - 205 L	205 - 1000 L	>1000 L
Non DG, e.g. Water, Non DG Chemicals	Minor	Minor	Minor	Minor	Major
DG Class 3, e.g. Solvent	Minor	Major	Major	Major	Major
DG Class 6, e.g. Perch, Methyl Chloride	Minor	Major	Major	Major	Major
DG Class 8, e.g. Acids, Ammonia	Minor	Major	Major	Major	Major

Actions to be taken during or immediately after the incident are as follow:

- Major Spill
  - Contain the spill if possible, using a Spill Containment Kit, and/or drain mats. Use PPE.
  - Close the drain intercept to prevent spill escaping site.
  - Raise the alarm – Contact Fire Warden or Chief Fire Warden. They will order evacuation of non-essential persons from the area or order evacuation of the site.
  - Chief Fire Warden will enact our ERP (Emergency Response Plan) if deemed necessary.
  - Chief Fire Warden will contact Ambulance, NSW Fire & Rescue or Police if required.
  - Chief Fire Warden will have a copy of all information in the Hazmat box on hand for Fire & Rescue if required.
  - Isolate any contaminated individuals for treatment by a qualified First Aider as per SDS.
  - EHS Committee will conduct an internal investigation and report on the incident as a matter of Continuous Improvement and put into place measures to avoid a recurrence of the incident.
  - EHS Committee - will self-report the incident to the EPA, Fire & Rescue NSW, Safe Work Australia, Local Council, Ministry of Health and the Office of Environment and Heritage as deemed appropriate.
  
- Minor Spill
  - Contain the spill using a Spill Containment Kit or other appropriate materials. Use PPE.
  - Isolate the spill/hazard with a physical barrier.
  - Identify the chemical or hazard and follow SDSs when handling the spill/hazard.
  - Use the information from the SDSs of the materials to judge response and/or evacuation procedures.
  - Notify Production Supervisor and/or any of the EHS Committee members
  - Clean the spill/hazard as per the “Spill Response Procedure”
  - Record the spill in the Spill register with the requested form details.  
Regardless of the size of the spill the EHS Committee will conduct an internal investigation and record the incident as a matter of Continuous Improvement and put into place measures to avoid a recurrence of the incident.

### 14. Staff Training

- All staff training records are maintained in our compliance software. Records include training date, employee name, training type, recurrency and any related proof

- Weekly toolbox talks are held every Monday morning with production staff
- Spill containment and awareness training is conducted every 2 years
- First Attack Fire Fighting training is conducted by Fire & Rescue NSW every 2 years to keep staff up to date with current techniques in fighting small fires and use of extinguishers.
- Fire Drills are conducted quarterly and recorded internally within our compliance software, ISOPro

**15. Testing and Updating The PIRMP**

- The PIRMP shall be tested at least once every 12 months and within one month of any pollution incident occurring
- PIRMP can be tested using 2 methods: a desktop audit or scenario, and practical exercises or drills
- The PIRMP shall be reviewed at least once every 12 months or when changes in personnel/equipment or plant relevant to this document change and immediately after any incident that requires this procedure being enacted
- PIRMP Testing and Reviews record are outlines in Appendix 7
- PIRMP will be tested by at least 2 staff members inclusive of 1 EHS team member using the following techniques
  - Tabletop office audit, and
  - Workplace “Mockup” of an actual spill or incident in real time at our premises
- Records to be taken during this process and recorded in our compliance software

## 16. Appendixes

- Appendix 1 – Hazardous Chemical List

Storage Area	D3FO #	Legacy #	Description	Typical Qty	Maximum Qty	UoM
Non-DG Store	1753186	1753186	1,2-Benzisothiazol-3(2H)-One (BIT) 20%	25	50	kg
10	1020428	R0040	Acetone	1,600	4,300	L
Non-DG Store	1020551	R0453	Acid Light Yellow	20	60	kg
Storage Area	1020513	R0323	Acticide HF	24	49	L
Non-DG Store	1020495	R0263	Additin 3038	150	200	kg
SR			Aerosols	5,000	6,000	L
Non-DG Store	1020418	R0012	Aihai Talc PV30	500	1,000	kg
10	1020430	R0051	Alox 2140 53%	800	930	L
Non-DG Store	1020517	R0361	Alpex CK450	25	25	kg
13	1020508	R0314	Ammonia Aqueous	22	44	L
Non-DG Store	1020484	R0217	Auto Kolone Perfume	50	100	kg
AGT (7)	1020481	R0212	B45 Hydrocarbon	3,000	7,200	L
AGT (8,9)	1020482	R0213	B75 Hydrocarbon	6,000	14,400	L
UST (2)	1020425	R0032	Base Oil 150	10,000	20,000	L
Non-DG Store	1020441	R0072	Bentone SD1	100	200	kg
Non-DG Store	1020473	R0169	BHT-Food Grade	100	200	kg
Non-DG Store	1002217	R0046	Blue Dye	20	25	kg
Non-DG Store	1020493	R0261	Borax Pentahydrate	50	100	kg
Non-DG Store	1020535	R0418	Brilliant Blue FCF	20	25	kg
10	1020414	R0004	Butanol	100	200	L
Non-DG Store	1020527	R0405	Butyl Glycol Ether	100	200	kg
Non-DG Store	1020521	R0365	BYK 410	25	25	kg
Non-DG Store	1020545	R0441	Caramel Hgp	10	25	kg
AGT (3)	1020476	R0200	Carbon Dioxide	3,000	4,500	L
Bottle Line	1020544	R0440	Caustic Soda 40%	192	331	L
13	1020297	C0006	C-C3 RTL	8,000	14,000	L
Non-DG Store	1752721	1752721	Chem – 1-Hydroxyethylidene-1,1-Diphosphonic Acid (HEDP) 60%	200	600	kg
Non-DG Store	1011593	68017	CHEM - CABOSIL TS720	30	50	kg
Non-DG Store	1752363	1752363	Chem - Chlorocresol	15	251	kg



10	1010881	69058	CHEM - DDAC 80% / BARDAC 2280	300	800	L
Non-DG Store	1011507	R0029	CHEM - DIMER ACID	1200	2000	kg
Non-DG Store	1752712	1752712	Chem - Disodium 2,5-Dimercapto-1,3,4-Thiadiazole (NATD) 30%	750	1,000	kg
Non-DG Store	1010723	R0254	CHEM - LEATHER D102678	20	40	kg
Non-DG Store	1012273	64555	CHEM - PARALOID B-64 100%	100	250	kg
Non-DG Store	1011509	R0026	CHEM - SODIUM SULPHONATE HH	1800	2000	kg
Non-DG Store	1011506	R0003	CHEM - SORBITAN MONO-OLEATE	4000	5000	kg
Non-DG Store	1752711	1752711	Chem - Triethanolamine (TEA) 99%	230	1000	kg
Non-DG Store	1020434	R0056	Chisorb 5530	25	30	kg
Non-DG Store	1755203	1755203	Chlorinated Paraffin AS52	200	260	kg
Non-DG Store	1020451	R0098	Chroma-Chem White 6 (DINP)	5	20	kg
Non-DG Store	1020927	R0266	Citric Acid Monohydrate	50	100	kg
10	1007759	R0208	Clear Urethane RTL	100	200	L
UST (5)	1020348	M0321	CRC Aerostart RTL	10,000	14,660	L
Non-DG Store	1752852	1752852	CRC Evapo-Rust Concentrate 1X275GL	0	1200	L
Non-DG store	1007761	R0509	CRC Molyvan L (AUS) 1X19L	50	190	L
Non-DG store	1007760	R0506	CRC Polysilicone PCR (AUS) 1X19L	150	200	L
10	1007755	R0025	CRC Trans 1,2 Dichloroethylene (AUS) 1X208L	500	500	L



Non-DG Store	1007757	R0055	CRC ViscopleX 8-219 (AUS) 1X208L	340	410	L
Non-DG Store	1752534	1752534	Crodacor BE-LQ-(AP)	100	200	kg
Non-DG Store	1752933	1752933	Cutmax 226S	50	2,000	L
10	1020526	R0404	Cyclohexanone	150	200	L
10	1020563	R0516	D Limonene	150	1,600	L
Non-DG Store	1020455	R0111	Decolamide FAG	300	400	kg
Non-DF Store	1020536	R0421	Defoamer Silfax D2TG	25	50	kg
Non-DG Store	1020436	R0060	Deodall No 1	20	50	kg
Non-DG Store	1020518	R0362	Di-2-Ethylhexyl Phthalate	50	50	kg
10	1020442	R0075	Diacetone Alcohol	50	300	L
Non-DG Store	1020460	R0124	Diatomite TS20	20	25	kg
Bottle Line	1020546	R0442	Diethanolamine 85%	200	250	kg
10	1020503	R0308	Diethyl Ether	0	0	L
	1020516	R0351	Dipropylene Glycol Monomethyl Ether (DPM)	340	400	L
13	1020522	R0369	Disparlon 6900-20X	50	200	kg
12	1020928	R0267	Dissolvine GI-47-s	1400	1500	kg
Non DG Store	1020452	R0101	Dissolvine NA	50	400	kg
Non DG Store	1020516	R0351	Dowanol Glycol Ether DPM	300	400	kg
10	1020448	R0093	Dowanol PM Glycol Ether	400	1000	L
Non DG Store	1020450	R0096	Eternabrite 651-1 Alumi Paste	100	100	kg
10	1755092	1755092	Ethanol 95SGF4	1000	1,600	L
Non DG Store	1756420	1756420	Extreme Power 47 Perfume	25	50	kg
Non DG Store	1020497	R0301	Fatty Alcohol Tech 9/6	100	200	kg
Non DG Store	1020529	R0408	Gardinol ESB	120	400	kg
Non DG Store	1020562	R0515	Gear Oil 85W/140	400	800	L
Non DG Store	1020426	R0035	Glycerine USP	250	500	kg
Non DG Store	1002365	00346	GLYCEROL TRI OLEATE*KEMESTER	14	42	kg



Non DG Store	1020457	R0120	Gum Tragacanth Reg 400	4	25	kg
10	1020514	R0349	Heptane	5000	8000	L
Non DG Store	1020443	R0085	Hikotack P120	35	50	kg
Non DG Store	1020558	R0510	Hitec 151	65	165	kg
Non DG Store	1752349	1752349	HydroCER Emulsion	20	40	kg
Non DG Store	1020444	R0086	Hypax 450	350	500	kg
Non DG Store	1754372	1754372	Hypax 450-18 52/57	1190	1190	kg
10	1020505	R0311	IMS100 Ethanol	400	1000	L
10	1020510	R0319	IPA	764	2,000	L
Non DG Store	1002766	00744	IRGALUBE 349*SMALL-LUBE 349-C	85	150	kg
Non DG Store	1002367	00351	IRGALUBE TPPT*SMALL-LUBETPPT-C	38	80	kg
Non DG Store	1002366	00348	IRGANOX L-64*SMALL-NOX L-64C	120	180	kg
13	1020480	R0210	Isohexane	6,000	11,500	L
Non DG Store	1020500	R0304	Ixosurf NP5	400	800	kg
DG Cabinet	1020475	R0186	KAF 1711 Fragrance	30	40	kg
12	1020454	R0110	LABSA Dobanic Acid	600	700	L
Non DG Store	1020559	R0511	Lanolin Anhydrous USP	350	400	kg
Bottle Line	1020550	R0450	Lemon A 300-550-20	10	28	L
Non DG Store	1000392	R0433	Liquitint Brilliant Orange	75	80	ea
Non DG Store	1020490	R0256	Lubrizol 5318B	250	400	kg
Non DG Store	1020494	R0262	Lubrizol 7077R	100	400	kg
Storage Area	1020487	R0220	Marine Fresh Perfume	50	60	kg
DG Cabinet	1020531	R0412	Masking Fragrance	34	43	L
12	1755135	1755135	Mergal K10N	40	60	kg
12	1020456	R0116	Mergal K14	53	75	kg
10	1020525	R0403	Methanol	25	160	L
Non DG Store	1020534	R0417	Methocel 311	20	40	kg
10	1020539	R0434	Methoxypropyl Acetate	380	619	L
11	1020530	R0409	Methyl Chloride	2700	3,000	L
10	1020528	R0406	Methyl Ethyl Ketone	300	800	L
Non DG Store	1020419	R0016	Methyl Salicylate	250	300	kg



Non DG Store	1020445	R0087	Microwax	49	50	kg
10	1020499	R0303	Mineral Turpentine	450	4,000	L
Non DG Store	1007761	R0509	Molyvan L	50	100	ea
Non DG Store	1020496	R0264	Nanoflon PAO30	20	100	kg
Non DG Store	1020468	R0161	Neatsfoot Oil TP 110	10	200	kg
Non DG Store	1020470	R0164	Neatsfoot Oil TP 120	100	200	kg
Non DG Store	1020491	R0257	Nyflex 222B D1182	140	400	kg
Non DG Store	1020437	R0063	Nyflex 804 D1182	650	900	kg
Non DG Store	1753566	1753566	Opteon SF10	4000	3,600	kg
Non DG Store	1020474	R0185	Orisurf La8	220	380	kg
Non DG Store	1755124	1755124	PAO100	100	400	kg
Non DG Store	1020440	R0070	PAO40	50	200	kg
Non DG Store	1752825	1752825	PAO6	210	350	kg
Non DG Store	1020439	R0069	PAO8	37	200	kg
Non DG Store	1020533	R0416	Paraffin Wax 50J	5	30	kg
11	1002318	R0010	Perchloroethylene	1,600	4,200	L
Non DG Store	1020547	R0446	Perlastan L30	170	200	kg
UST (4)	1020502	R0307	Petrol Unleaded	1500	10000	L
Non DG Store	1011504	R0024	Petroleum Jelly Amber	1500	1800	kg
10	1020498	R0302	Pine Oil 85%	25	180	kg
Non DG Store	1020507	R0313	Polybutene PB2400	60	100	kg
Non DG Store	1007760	R0506	Polysilicone PCR	150	200	ea
Non DG Store	1020459	R0123	Polysorbate 20	200	300	kg
Non DG Store	1020467	R0160	Process Oil 1000 Green	600	1,000	kg
10	1752134	1752134	Propyl Alcohol Normal	180	187	kg
Non DG Store	1020448	1020448	Propylene Glycol Monomethyl Ether	410	570	L
Non DG Store	1020520	R0364	Purmol 3ST	20	20	kg
Non DG Store	1753140	1753140	RBDW High Oleic Sunflower Oil	600	900	kg
Non DG Store	1020471	R0166	Red Thyme Oil	20	20	kg
Non DG Store	1020466	R0151	Shellsol D60	550	640	L
Non DG Store	1020486	R0219	Siana Perfume	0	25	kg
Non DG Store	1020565	R0525	Silicone Fluid 100 CS	550	600	kg
Non DG Store	1020566	R0526	Silicone Fluid 1000 CS	350	400	kg
Non DG Store	1020561	R0514	Silicone Fluid 10000 CS	120	200	kg
Non DG Store	1020564	R0523	Silicone Fluid 350 CS	600	800	kg

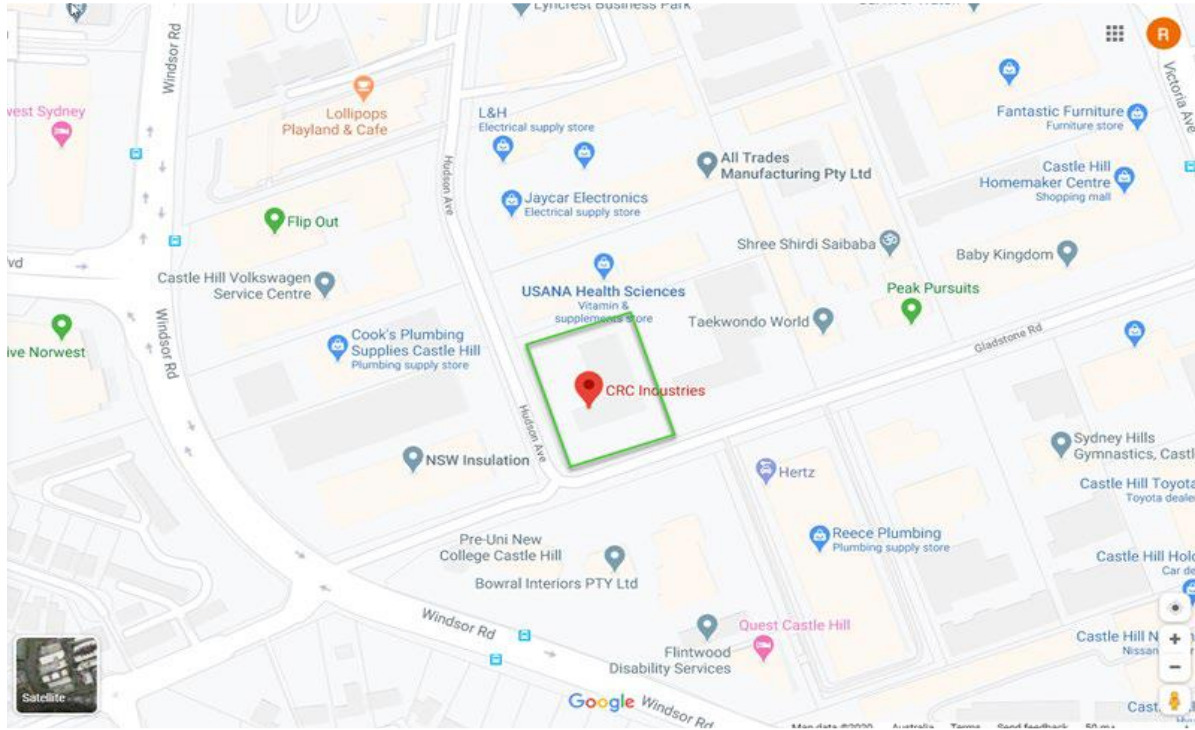


Non DG Store	1020453	R0109	Sodium Benzoate	15	100	kg
Non DG Store	1020537	R0428	Sodium Bicarbonate	125	200	kg
Non DG Store	1020926	R0265	Sodium Citrate	350	400	kg
Non DG Store	1020511	R0321	Sodium Gluconate	265	300	kg
Non DG Store	1020506	R0312	Sodium Nitrite	15	75	kg
Non DG Store	1020548	R0448	Sodium Sulphate Anhydrous	125	200	kg
Non DG Store	1020427	R0038	Solvent D110	390	400	L
10	1020515	1020515	Solvent D30	375	622	L
10	1020532	R0413	Solvent D40	670	1,800	L
10	1020438	R0065	Solvent N10	267	4,156	L
Non DG Store	1020458	R0121	Span 20	45	200	kg
Non DG Store	1020512	R0322	Stepsol MET-10U	670	700	kg
Non DG Store	1755378	1755378	Surfynol 465	20	80	kg
Non DG Store	1756853	1756853	Tac Oil C	250	360	kg
Non DG Store	1020469	R0163	Tallow	50	150	kg
10	1020554	R0500	ThixoCal 3000A	900	1,200	L
10	1020556	R0508	ThixoCal 7000E	800	1000	L
10	1020524	R0402	Toluene	300	1,200	L
Non DG Store	1753569	1753569	Trimethylnonyl Ether Ethoxylated 6 M (TMN-6)	190	200	kg
Non DG Store	1020485	R0218	Vanilla Shake Perfume	42	50	kg
Non DG Store	1000393	R0436	Videt Q3	500	1,632	kg
Non DG Store	1007757	R0055	Viscoplex 8-219	340	600	ea
UST (1)	1020420	R0022	Vivasol 2046	50,000	110,000	L
Non DG Store	1752875	1752875	White Oil Pharma 6 (WOP 68)	190	340	kg
10	1020504	R0310	White Spirits	850	2,000	L
10	1020523	R0401	Xylene	700	1,600	L
Non DG Store	1020483	R0215	Yellow Dye	20	25	kg
Non DG Store	1020519	R0363	Zinc Dust	2,000	2,000	kg

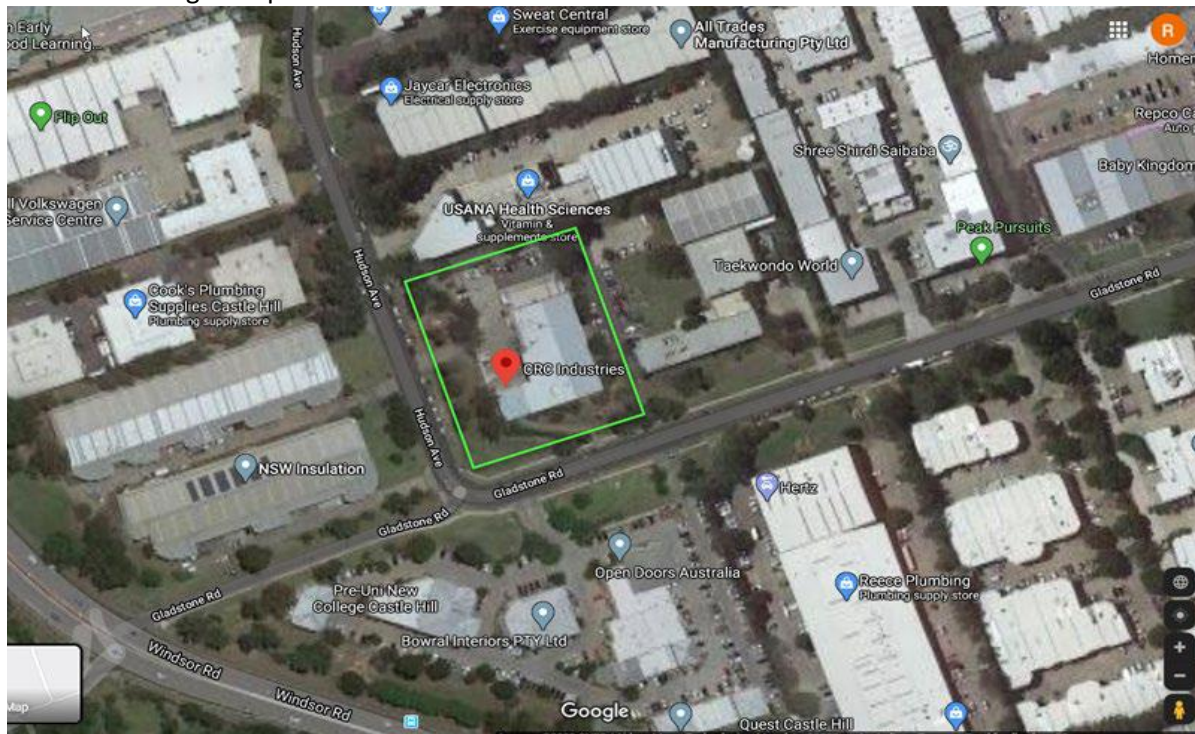


- **Appendix 2 – Location of Site**

Location - CRC Industries, 9 Gladstone Road, Castle Hill, NSW 2154, Australia




Location – Google Map View



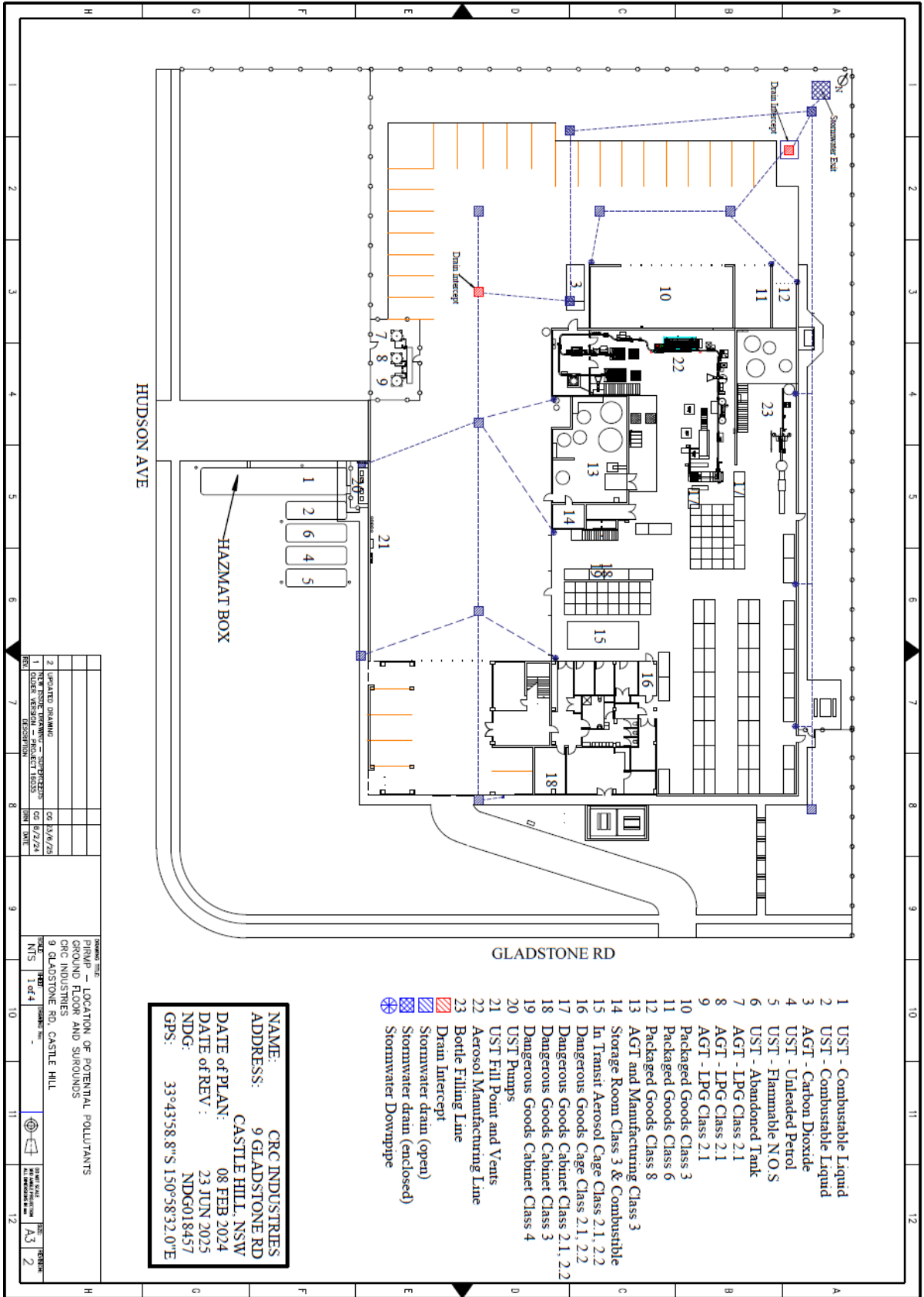
Latitude: -33.727718°

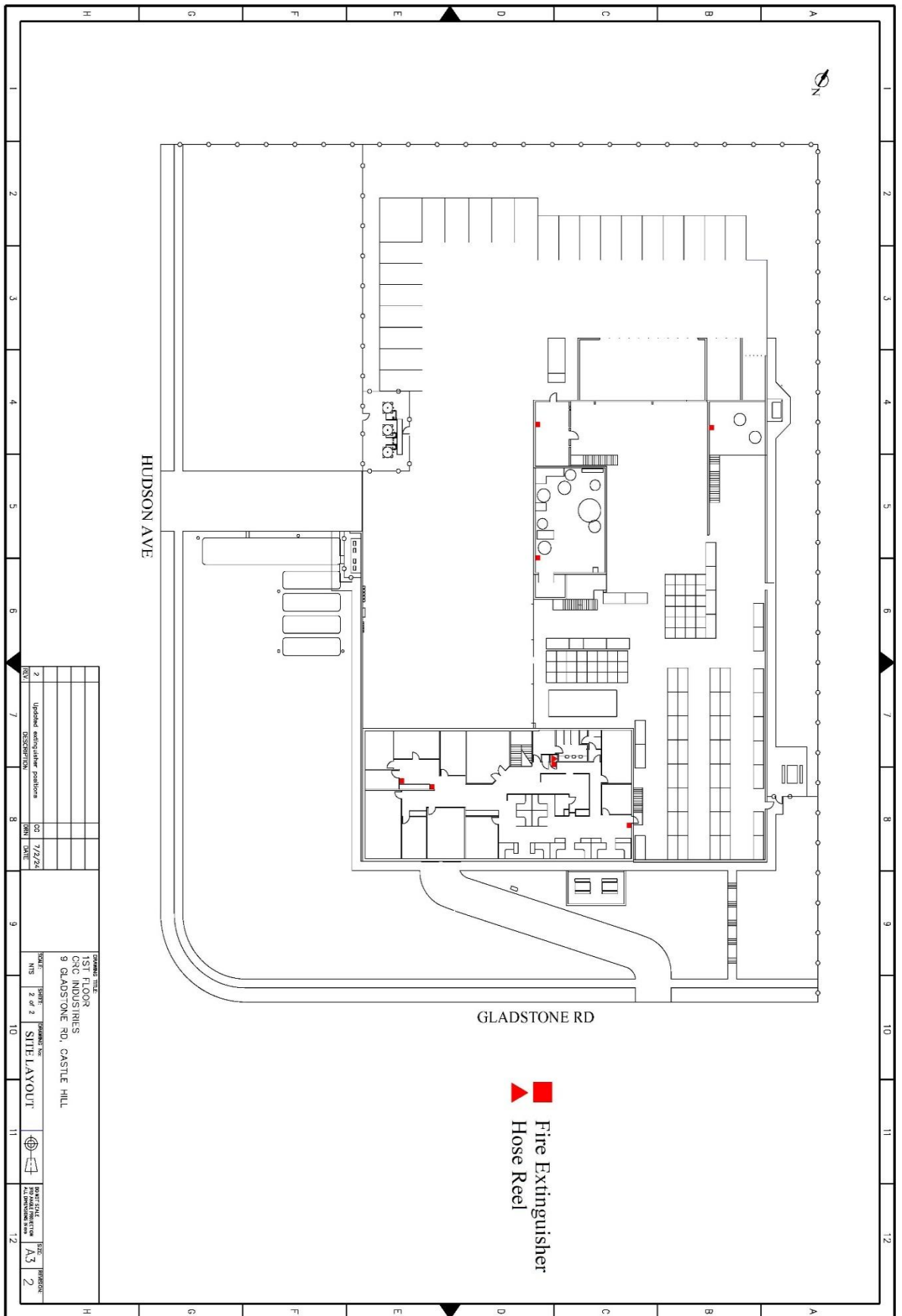
Longitude: 151.00899°

	Pollution Incident Response Management Plan	Effective Date: June 2025	Version: 18	Page 17 of 27
	Printed documents are uncontrolled			

• **Appendix 3 – CRC Site Map**

Map includes: Drainage & Stormwater Drain Intercept Point and Emergency Response Equipment





REV	DESCRIPTION	DATE	BY
2	Updated extinguisher positions	17/2/24	SKM
1			
0			

PROJECT TITLE	DATE
CSC INDUSTRIES	17/2/24
9 GLADSTONE RD, CASTLE HILL	

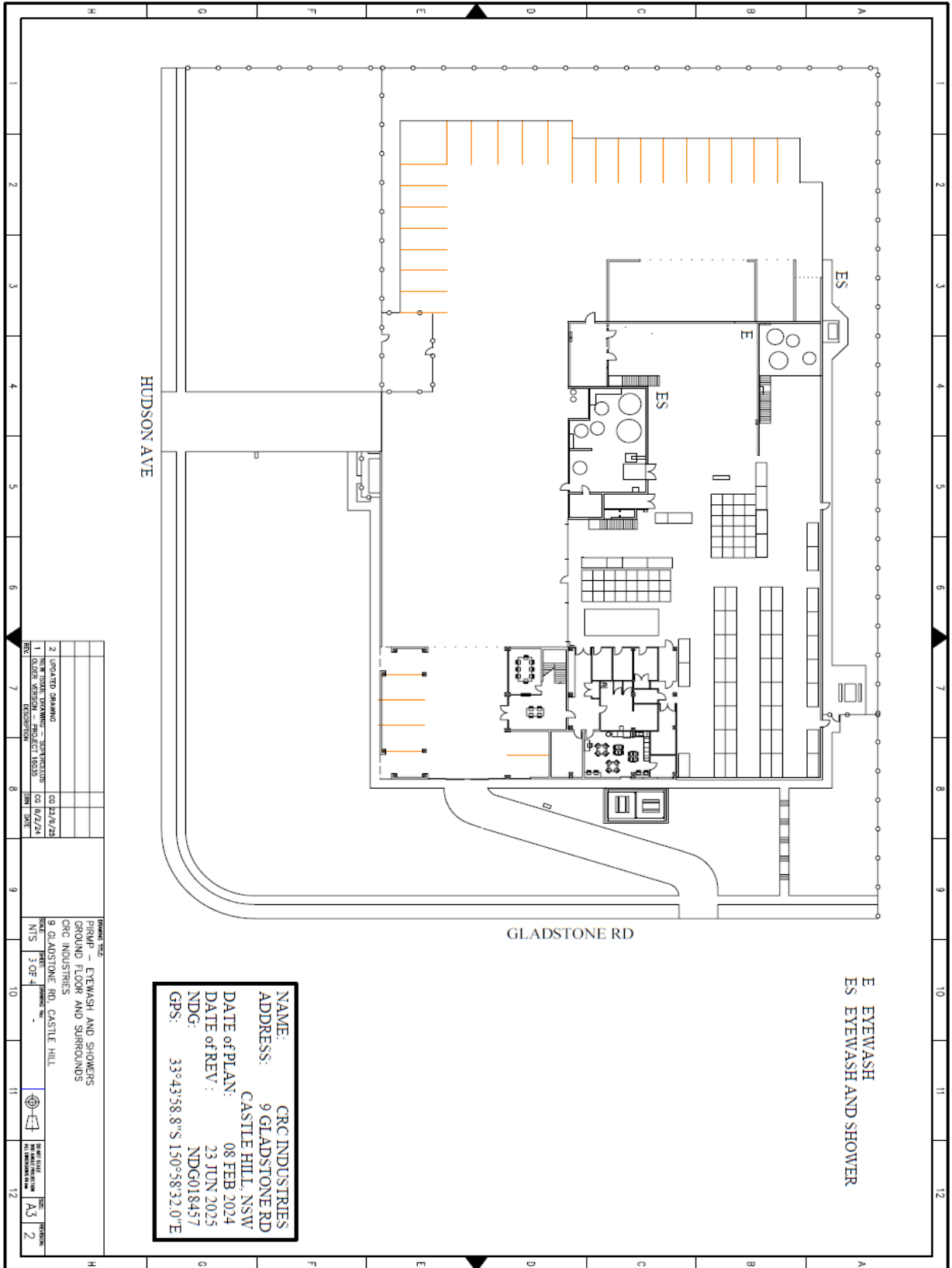
SCALE	DATE	ISSUED FOR	PROJECT NO.
1:1	2 of 2	SITE LAYOUT	12

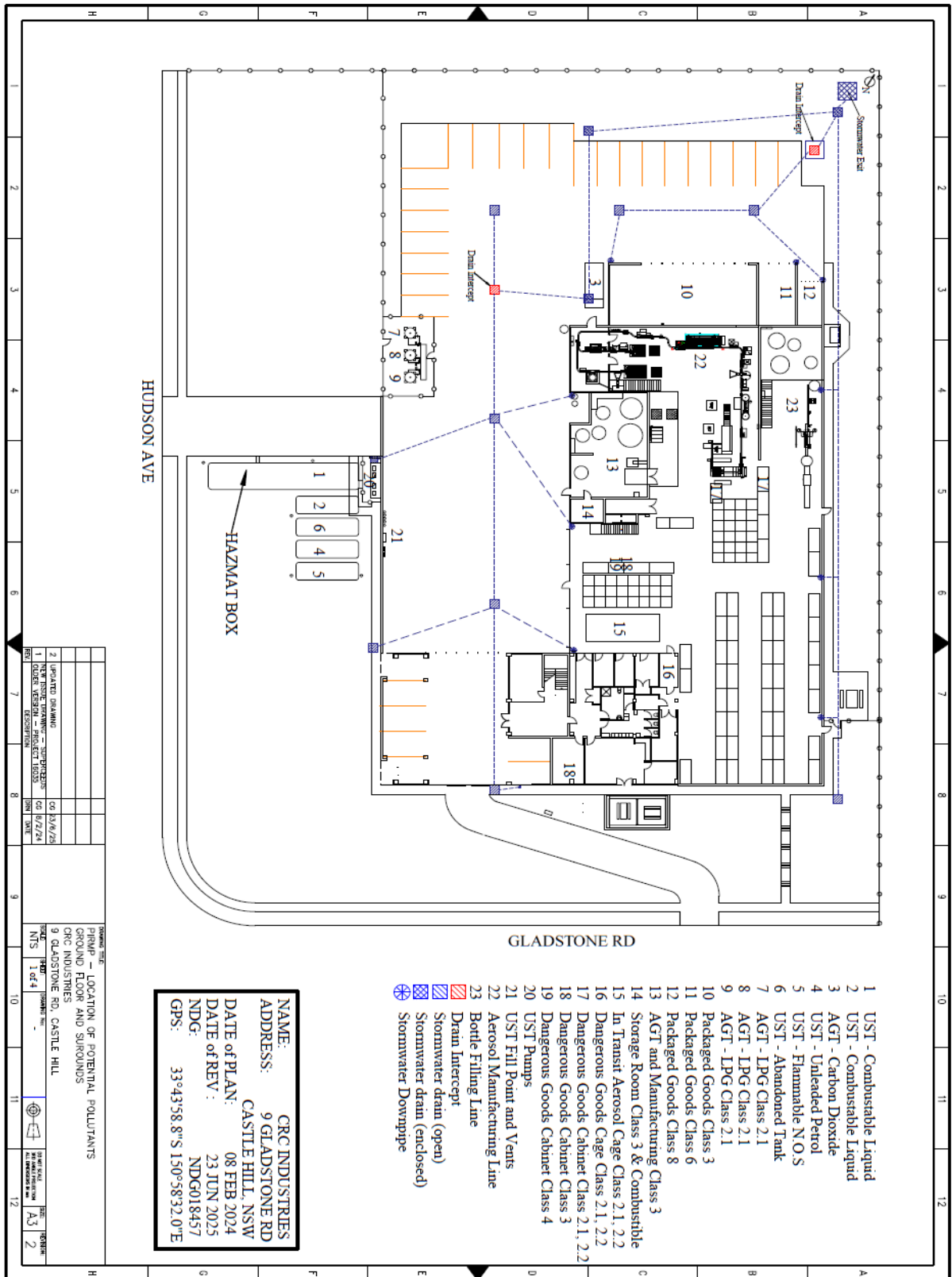
SCALE	DATE	ISSUED FOR	PROJECT NO.
1:1	2 of 2	SITE LAYOUT	12

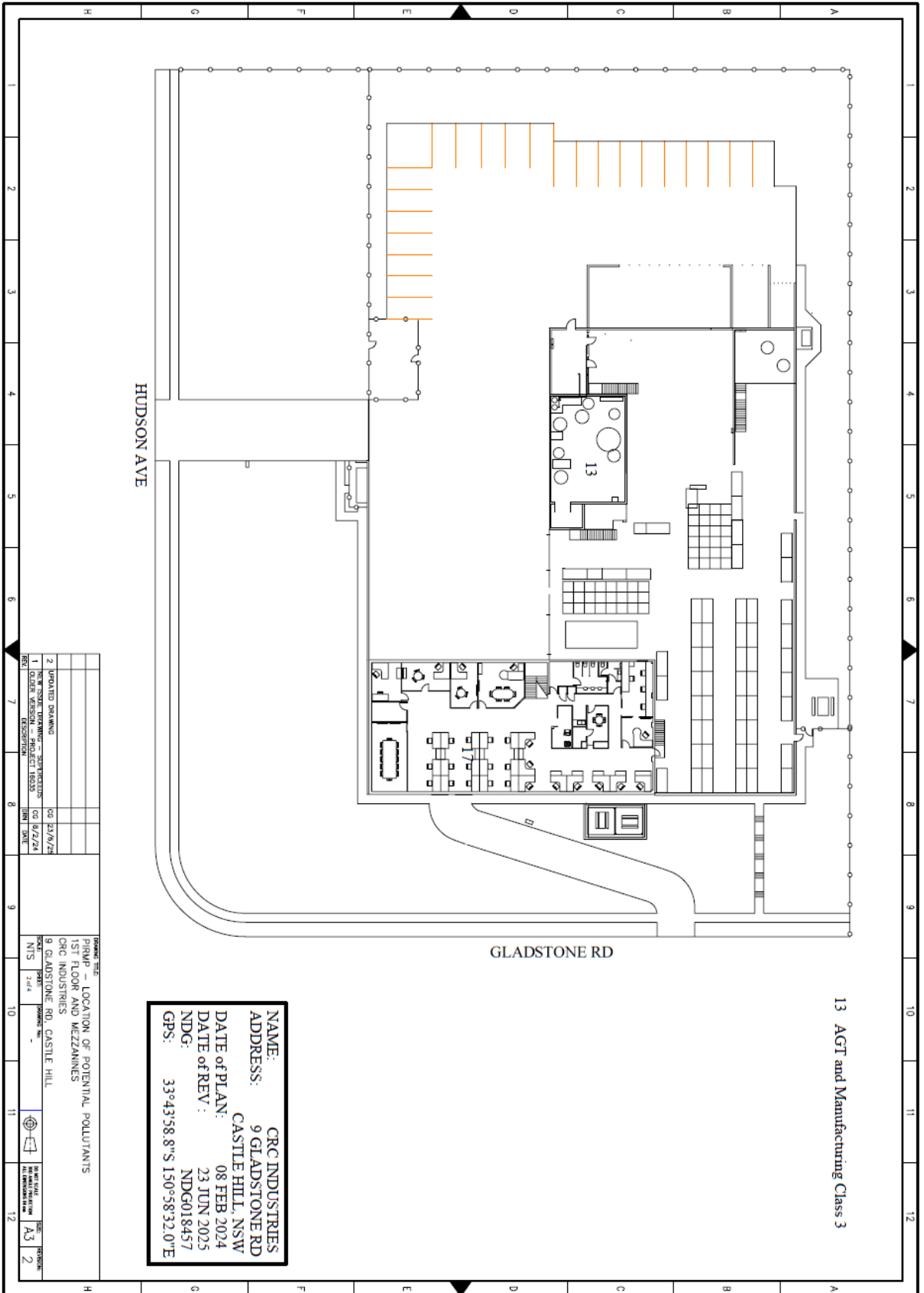
 Fire Extinguisher  
 Hose Reel

- Appendix 4 – Emergency Eyewash and Shower Locations



- Appendix 5 – Locations of Potential Pollutants





13 AGT and Manufacturing Class 3

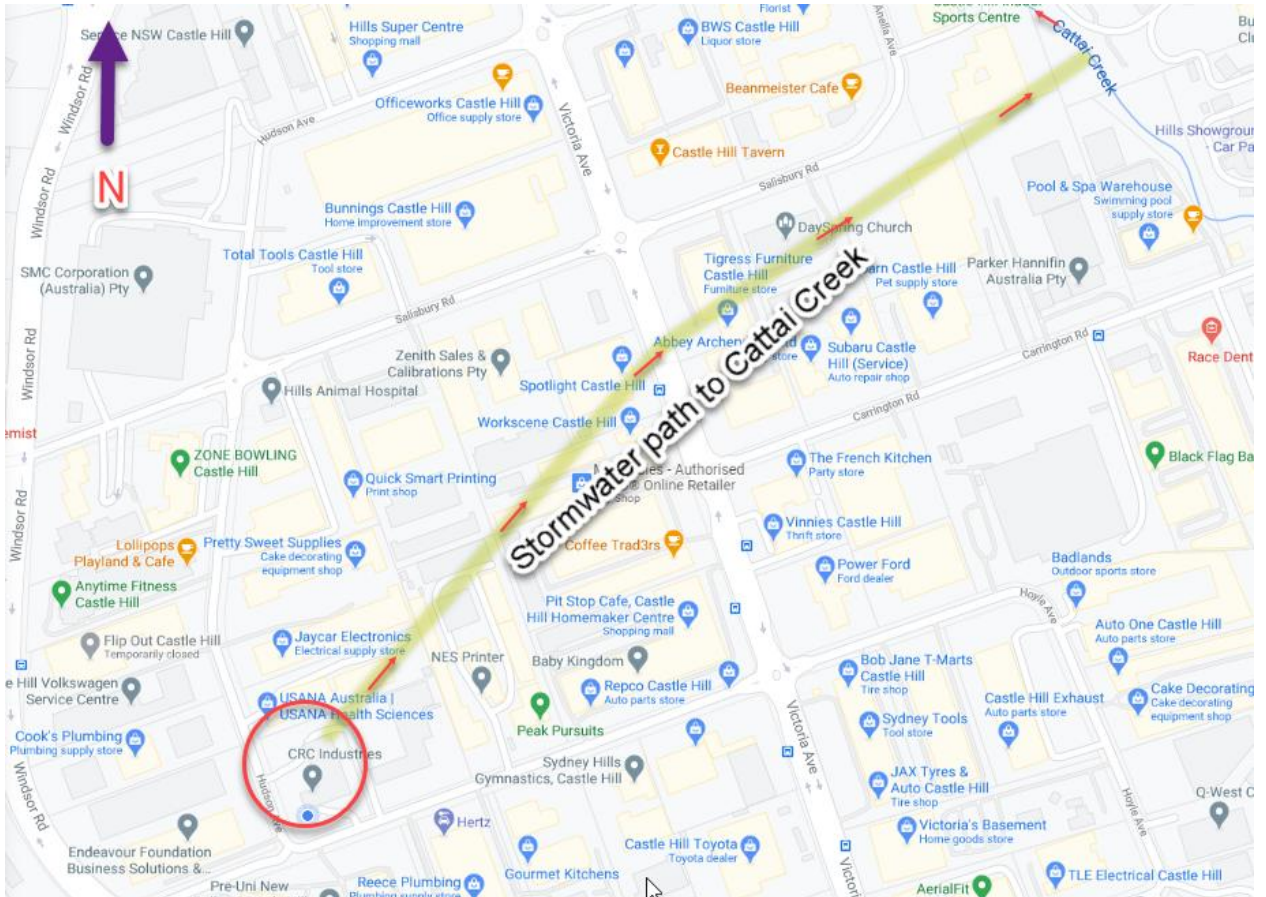
**NAME:** CRC INDUSTRIES  
**ADDRESS:** 9 GLADSTONE RD  
 CASTLE HILL, NSW  
**DATE of PLAN:** 08 FEB 2024  
**DATE of REV.:** 23 JUN 2025  
**NDG:** NDCG018457  
**GPS:** 33°43'58.8" S 150°58'32.0" E

REV	NO	DESCRIPTION	DATE	BY	CHKD
2		UPDATED DRAWING	02/20/24		
1		FLUOR VENTILATION - MEZZANINE	02/07/24		
		FLUOR VENTILATION - PROJECT LOSS			

**ISSUED FOR:** PRIMARY - LOCATION OF POTENTIAL POLLUTANTS  
 1ST FLOOR AND MEZZANINES  
 CRC INDUSTRIES  
 9 GLADSTONE RD, CASTLE HILL  
 NIS

**SCALE:** AS SHOWN  
**DATE:** 23 JUN 2025  
**REV:** 2

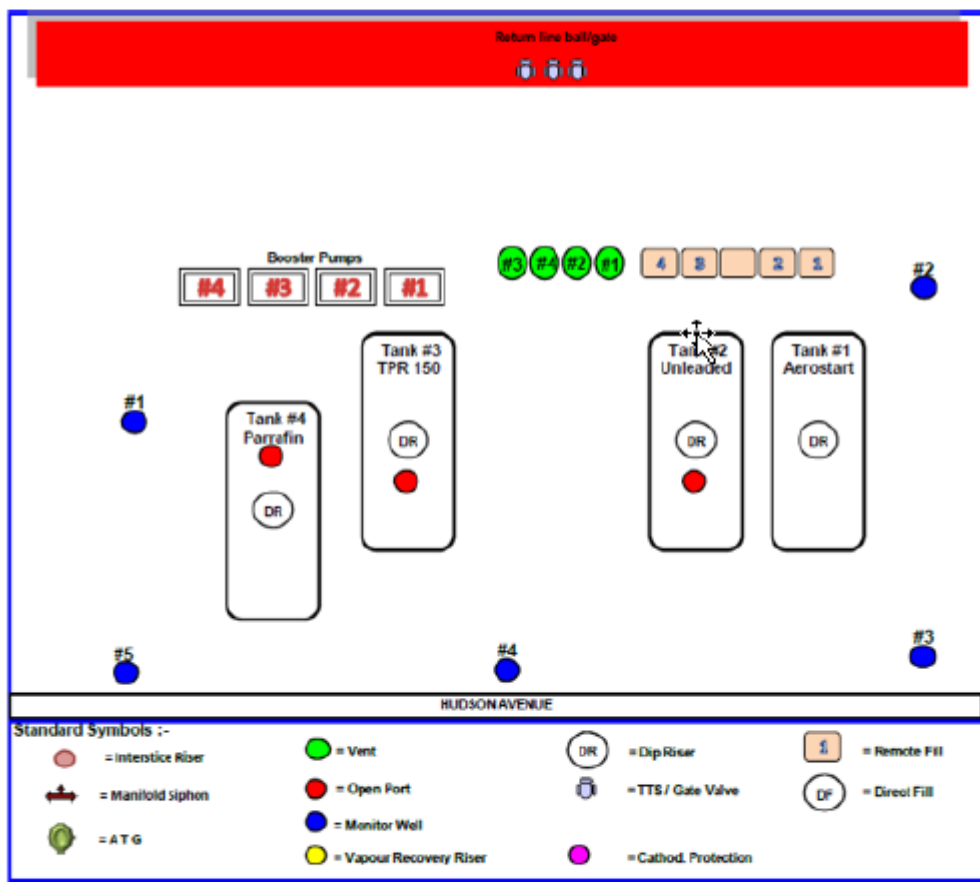
- Appendix 6 – Storm Water Entry to Local Creek



• Appendix 7 – PIRM Test Records – Hydrocarbon Detector

Site :	CRC Industries (AUST) Pty Ltd
Address	9 Gladstone Rd, Castle Hill NSW 2154
Testor	Colin Gurney (Facilities/Maintenance Manager ANZ)
Test Equipment Used	Gas Alert MicroClip XT hydrocarbon detector

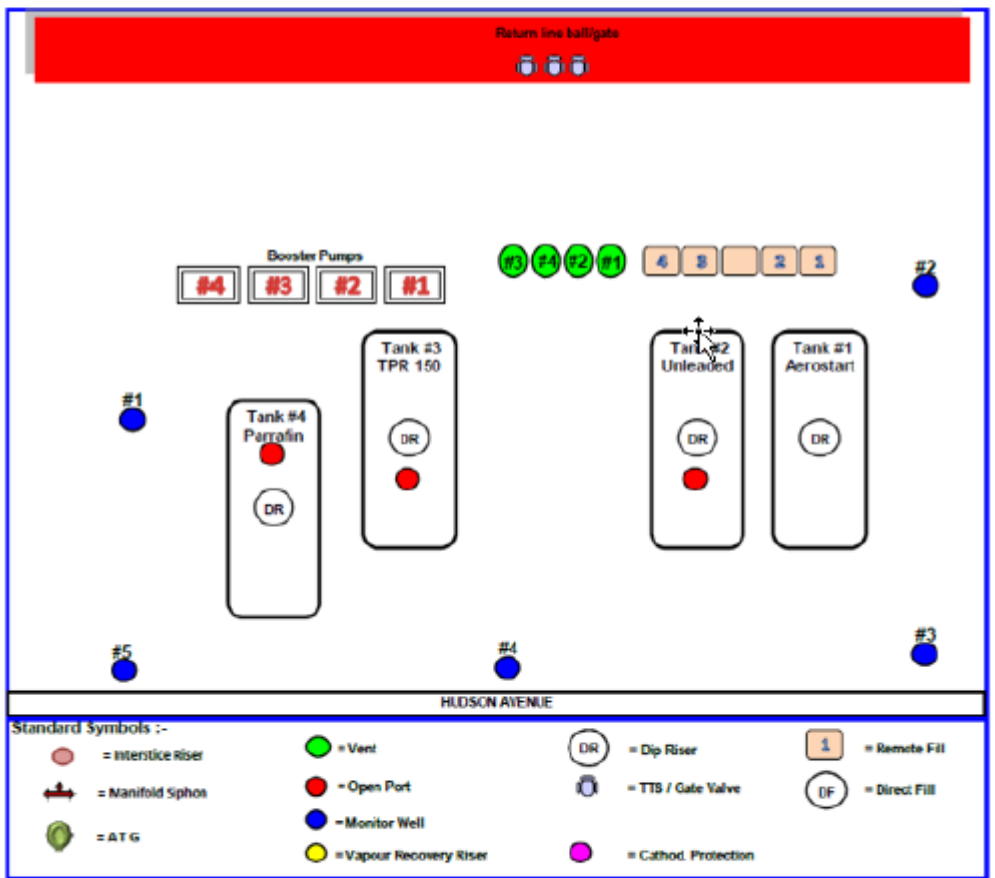
Well	1	2	3	4	5
Well Depth	4400	4300	4600	4600	5000
Depth to Water	1600	2400	2700	2200	2200
Product detected	0	0	0	0	0



Signature		Date	10/03/2025
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Site :	CRC Industries (AUST) Pty Ltd
Address	9 Gladstone Rd, Castle Hill NSW 2154
Testor	Colin Gurney (Facilities/Maintenance Manager ANZ)
Test Equipment Used	Gas Alert MicroClip XT hydrocarbon detector

Well	1	2	3	4	5
Well Depth	4400	4350	4600	4600	5000
Depth to Water	900	1450	1800	2200	2900
Product detected	0	0	0	0	0



Signature	<i>CG</i>	Date	25/06/2025
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- Appendix 8

**PIRMP Reviews Records**

<b>Reviewed By</b>	<b>Reviewed Date</b>
Richard Warren	1 March 2012
Phillip Mulligan	February 2013
Phillip Mulligan	January 2014
Richard Warren	March 2015
Richard Warren	November 2015
Richard Warren	February 2016
Richard Warren	March 2017
Richard Warren	July 2018
Alen Rogosic	February 2019
Colin Gurney	16 April 2020
Colin Gurney	23 March 2021
Lyn Darius	15 July 2021
Lyn Darius	26 July 2022
Lyn Darius	15 February 2023
Lyn Darius Colin Gurney	17 July 2023
Lyn Darius Colin Gurney	12 February 2024
Lyn Darius Colin Gurney	18 July 2024
Milind Mehendale Colin Gurney	13 <sup>th</sup> May 2025



## PIRMP Test Records

<b>Tested By</b>	<b>Tested Date</b>
Richard Warren	1 March 2012
Phillip Mulligan	February 2013
Phillip Mulligan	January 2014
Richard Warren	March 2015
Richard Warren	March 2016
Richard Warren	February 2017
Richard Warren	July 2018
Alen Rogosic	August 2019
Emily Blair-Hickman	6 August 2020
Lyn Darius Colin Gurney	15 July 2021
Lyn Darius Colin Gurney	28 July 2022
Lyn Darius Colin Gurney	19 July 2023
Lyn Darius Colin Gurney	8 July 2024
Colin Gurney Vikas Parbhakar	10 March 2025
Colin Gurney Vikas Parbhakar	25 June 2025

