

# Pollution Incident Response Management Plan

MR644 PROSPECT HIGHWAY UPGRADE

# ACKNOWLEDGEMENT TO COUNTRY

Fulton Hogan acknowledges the Darug Nation People as the Traditional Owners of the land we are working on, and pay our respect to their Elders past, present and emerging.

We recognise their deep connection to Country and value the contribution to caring for, and managing the land and water.

We are committed to pursuing genuine and lasting partnerships with Traditional Owners to understand their culture and connections to Country in the way we plan for and carry out the delivery of the Works.



## Document control

This is an e-copy of the Plan and it interfaces with the other associated plans, which together describe the proposed overall project management system for the project.

The latest revision of this plan is available on the Fulton Hogan server. If any unsigned hard copies of this document are printed, they are valid only on the day of printing.

The revision number is included at the bottom of each page. When revisions occur, the entire document will be issued with the revision number updated accordingly for each owner of a controlled copy.

Attachments/Appendices to this plan are revised independently of this plan.

## Revision History

REV	DATE	AUTHOR / REVISED BY	ENDORSED BY	BRIEF DESCRIPTION OF CHANGE
0	30/09/2021	S. Clarke-Rowlands	D. Dimitrijevic	Initial submission for TfNSW review
1	14/07/2022	S. Clarke-Rowlands	D. Dimitrijevi	Appendix F Incident and Emergency Response Flowchart Chemical, Oil and Fuel Spills - AU
2	03/07/2024	S. Clarke-Rowlands	J.McCafferty	Updated contacts
3	09/08/2024	S. Clarke-Rowlands	J.McCafferty	Updated based of EPA Comments to maps chemical list and flowcharts
4	15/08/2024	A. Ngo	J.McCafferty	Updated to include TfNSW auditor comments

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## 1. Introduction

### 1.1. Purpose

This Fulton Hogan Construction holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for the MR644 Prospect Highway Upgrade from Reservoir Road to 200m North of St Martins Crescent, Blacktown.

As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying on the activity must implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A written copy of this plan must be kept at site compound located between Reservoir Road, Prospect and St Martins Crescent, Blacktown and be made available on request by an authorised NSW EPA Officer and to any person who is responsible for implementing this plan. Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

### 1.2. Definitions

The following terms, abbreviations and definitions are used in this plan.

► Table 1: Terms, abbreviations and definitions used in this plan (sample terms)

TERM	EXPLANATION
<b>AEC</b>	Areas of environmental concern
<b>CEMP</b>	Construction Environmental Management Plan
<b>CMP</b>	Contamination Management Plan
<b>DPI</b>	NSW Department of Primary Industries
<b>EMS</b>	Environmental Management System
<b>EPA</b>	NSW Environment Protection Authority
<b>EP&amp;A Act</b>	Environmental Planning and Assessment Act 1979
<b>EPL</b>	Environment Protection Licence under the POEO Act
<b>OEH</b>	Office of Environment and Heritage
<b>PAHs</b>	Polycyclic Aromatic Hydrocarbons
<b>PESCP</b>	Progressive Erosion and Sediment Control Plans
<b>PIRMP</b>	Pollution Incident Response Management Plan

<b>POEO Act</b>	<i>Protection of the Environment Operations Act 1997 (NSW)</i>
<b>Project, the</b>	MR644 Prospect Highway Upgrade from Reservoir Road to 200m North of St Martins Crescent, Blacktown
<b>TfNSW</b>	Transport for NSW

### 1.3. Structure of PIRMP

This PIRMP is part of Fulton Hogan’s incident management framework for the project and is supported by other documents, such as Incident Management Plan. The review and document control processes for this PIRMP are described in Chapters 11 and 12 respectively of the CEMP.

### 1.4. Consultation for Preparation of the PIRMP

No external consultation is required in the preparation of this CMP to comply with the environmental documents and therefore, none has been undertaken.

Ongoing consultation will be undertaken during construction of the project as required by the environmental documents. This will be subject to a separate consultation process to that required for preparation of this CMP.

## 2. Legal and Other Requirements

### 2.1. Legislation

Legislation relevant to air quality management includes:

- Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act)
- Part 5.7A of the Protection of the Environment Legislation Amendment Act 2011 (POELA Act)
- The Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012
- Environment Protection License (EPL) 3142

### 2.2. Environmental Protection Licence (EPL) details

▶ Table 2: EPL details

EPL DETAILS	
<b>Name of Licensee</b>	Fulton Hogan Construction – TfNSW (original EPL applicant)
<b>Australian Business Number (ABN)</b>	46 010 240 758
<b>EPL Number</b>	21295
<b>Premises Name and Address</b>	PROSPECT HIGHWAY BETWEEN RESERVOIR ROAD, PROSPECT AND ST MARTINS CRESCENT, BLACKTOWN, PROSPECT NSW 2148
<b>Scheduled Activities on EPL</b>	Road construction
<b>Fee Based Activities on EPL</b>	Road construction (>=50,000T & road to be constructed <10km)

### 3. Responsible persons

Part 5.7 of the POEO Act specifies that responsible persons must be nominated for the following actions in relation to a PIRMP:

- PIRMP Activation
- Notifying Relevant Authorities; and
- Managing Response to Pollution Incidents

Once determined that the incident causes or threatens material harm to the environment, notification must be given immediately, i.e. promptly and without delay, after the person becomes aware of the incident.

#### 3.1. PIRMP activation

The activation details for PIRMP is summarised in Table 3.

► Table 3: PIRMP activation details

PIRMP ACTIVATION	
<b>Name of Responsible Person</b>	John McCafferty
<b>Position or Title</b>	Senior Project Manager
<b>Business Hours Contact Number/s</b>	0404 131 614
<b>After Hours Contact Number/s</b>	1300 660 275
<b>Email Address</b>	John.McCafferty@fultonhogan.com.au

#### 3.2. Notifying relevant authorities

The person details for notifying the relevant authorities is included in table 4.

► Table 4: Notifying relevant authorities details

NOTIFYING RELEVANT AUTHORITY DETAILS	
<b>Name of Responsible Person</b>	Sasha Clarke-Rowlands
<b>Position or Title</b>	Senior Environmental Advisor
<b>Business Hours Contact Number/s</b>	0438 292 782
<b>After Hours Contact Number/s</b>	1300 660 275
<b>Email Address</b>	Sasha.Clarke-Rowlands@fultonhogan.com.au

### 3.3. Managing response to pollution incidents

The person details for managing response to pollution incidents is included in table 5.

► Table 5: Managing response to pollution incidents details

NOTIFYING RELEVANT AUTHORITY DETAILS	
<b>Name of Responsible Person</b>	Sasha Clarke-Rowlands
<b>Position or Title</b>	Senior Environmental Advisor
<b>Business Hours Contact Number/s</b>	0438 292 782
<b>After Hours Contact Number/s</b>	1300 660 275
<b>Email Address</b>	Sasha.Clarke-Rowlands@fultonhogan.com.au

## 4. Notification of relevant authorities

The individual nominated under section 3.2 of this PIRMP is responsible for notifying the following relevant authorities:

► Table 5: List of relevant authorities

LIST OF RELEVANT AUTHORITIES	
<b>Fire and Rescue NSW / Rural Fire Service (RFS)</b>	000 (for pollution incidents that present an immediate threat to human health or property) 1300 729 579 (for pollution incidents that do not present an immediate threat to human health or property)
<b>NSW Environmental Protection Authority (EPA)</b>	131 555
<b>NSW Health</b>	131 050
<b>Local Authority</b>	Blacktown City Council (02) 9839 1961 Monday to Friday 8.00am - 5.30pm. 1300 133 491 After Hours Assistance
<b>Transport for New South Wales (TfNSW)</b>	Contact: Ryan Georgette Phone: 0413 368 148 Email: Ryan.Georgette@transport.nsw.gov.au

## 5. Notification of neighbours and local community

In the event of a notifiable pollution incident, and dependent upon nature and scale, decisions to notify neighbours and the local community will be made in consultation with regulatory authorities.

In the event of an incident the following methods of communication shall be employed by the Community Relations Manager (CRM) depending on the severity and nature of the incident.

- Phone calls;
- Media releases (radio/television/newspaper/internet);
- Site visits/door knocking; and
- Letter box drops.

The extent of the communications with the neighbours and the community will depend on the:

- The magnitude of the emission or discharge;
- Type of pollutant;
- What that pollutant may impact – water, land;
- The potentially impacted area;
- Weather conditions; and
- Potential duration of the impact.

In all cases Fulton Hogan will attempt to provide early warning to directly affected premises by a phone call or a site visit. Early warning will include details of what the incident is, how those affected will need to respond, as well as providing important advice such as avoiding contact and use of affected land/waterways. This information will be given on a case by case basis.

If early warning is not possible Fulton Hogan will provide notification during and after an incident. Fulton Hogan will advise those affected with appropriate information, advice and updates.

## 6. Risk assessment & pre-emptive actions

An initial risk assessment has been undertaken prior to commencement of construction as part of Environmental Aspects and Impacts and Risk Assessment Register as outlined in Section 3.2.1 in the CEMP.

A program for ongoing analysis of the key environmental risks will occur for the duration of the project to ensure compliance with environmental protection requirements. The project environmental risk assessment is included in appendix A3 of the project CEMP, this will be publicly available at the following website link.

<https://www.transport.nsw.gov.au/projects/current-projects/prospect-highway-upgrade>

In addition to the mitigation measures / pre-emptive actions detailed in the risk assessment above, the following pre-emptive actions are also completed by Fulton Hogan in order to minimise the risk of a pollution incident occurring:

- Implementation of an ISO accredited environmental management system
- Development, use and maintenance of Environmental Work Method Statements (EWMS).
- Installation of equipment and storage of supplies for combatting an incident, e.g. spill containment kits
- Documented weekly environmental weekly inspections
- Internal and external audits of Fulton Hogan's systems and procedures.
- Onsite inductions for employees, contractors and suppliers.

## 7. Inventory of pollutants

An inventory of chemicals is maintained under the onsite SDS register, and weekly environmental inspections are undertaken to determine the suitability of storage locations onsite.

Potential pollutant (including chemicals) storage locations are detailed on the maps contained in Appendix A.

Table 6 lists potential pollutants and the location they are stored on site.

► Table 6: Volume of potential pollutants

POTENTIAL POLLUTANT	VOLUME	LOCATION
<b>Diesel Fuel</b>	5000L	Mixed locations with active plant
<b>Unleaded Fuel</b>	300L	Mixed locations with active plant
<b>Hydraulic Oil</b>	150L	Chemical Storage Crete
<b>Turbid Water</b>	100L	Held onsite in incidental areas after rain
<b>Other construction chemicals</b>		
<b>Vital P-47</b>	900L	Compound bunded chemical storage
<b>Actone</b>	10L	Chemical Storage Crete
<b>Actylene</b>	25L	Chemical Storage Crete
<b>Bitac &amp; Bitac DS Primer</b>	50L	Chemical Storage Crete
<b>Castrol Premium Heavy Duty</b>	50L	Chemical Storage Crete
<b>Clear Kerosne</b>	20L	Chemical Storage Crete
<b>Dy Mark Silver Zine</b>	5L	Chemical Storage Crete
<b>Fosroc Concure A99</b>	500L	Compound bunded chemical storage
<b>Dry Hydrochlorinc Acid</b>	5kg	Chemical Storage Crete
<b>Megapoxy</b>	20L	Chemical Storage Crete
<b>Rugasol C</b>	10L	Chemical Storage Crete

Safety Material Sheets are located as a hard copy within the compound chemical create and online by Chemwatch.

## 8. Safety equipment

Under the Fulton Hogan Safety Management Plan and ‘Living Safely’ campaign, minimum Personal Protection Equipment (PPE) requirements are in place for all employees, contractors, visitors and transport

operators. Minimum PPE includes high visibility clothing, steel-toed boots, hard hats and safety glasses. Other onsite safety-related equipment, monitoring and information includes:

▶ Table 7: safety equipment monitoring and information available

SAFETY EQUIPMENT	EDUCATION AND PROCEDURES	MONITORING
Provision of P2 Respirators	Site Inductions	Dust Monitoring
Fire Extinguishers	Incident response management plan	Water Monitoring
Spill Kits	Shift Pre Start Meetings	Weather monitoring
First Aid Facilities and Kits	SDS Register and procedures	Air Quality monitoring (via Air Quality NSW)
Chemical wash stations / showers	Project compounds and foreman vehicles	
Emergency Stop on all Mobile Plant	Chemical Identification and Signage	
Hearing Protection (both plugs and muffs)	Spill kit training	

## 9. Immediate action plan

A detailed response to a pollution incident is detailed within Appendix D – Immediate Action Plan.

## 10. Training

Training is provided to Fulton Hogan employees, subcontractors and visitors entering the site so that they are aware of site hazards and processes in the event of a pollution incident. Training includes inductions, toolbox talks and simulated desktop training scenarios and field based training exercises.

### 10.1. PIRMP testing

It is a legal requirement to test this PIRMP every 12 months and within 1 month of any pollution incident. This test is to be recorded on the form in Appendix B – PIRMP Test Record.

PIRMP Test have been completed on:

- 14 July 2022
- 14 July 2023
- April 2024

## 11. PIRMP maintenance

The PIRMP may require updating upon identification of any issues that may be identified during testing of the PIRMP or through any change of the personnel listed under section 3 – Responsible Persons.

## Appendix A: PIRMP maps



# Pollution Incident Response Management Plan

MR644 Prospect Highway Upgrade



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# Pollution Incident Response Management Plan

MR644 Prospect Highway Upgrade



Figure 1: Project boundary and stormwater system

# Pollution Incident Response Management Plan

MR644 Prospect Highway Upgrade



Figure 2: Project Compound Layout

## Appendix B: PIRMP test record

### PIRMP Test Record

**PART A: DETAILS OF THE ACTIVITY AND THE WORKPLACE**

Location of Activity / Worksite:

---

Date of Test:      Test Conducted by:

---

Type of Test:      Test Record Completed by:

---

Brief Description of Test Scenario:

---

KEY PARTICIPANTS (MANAGING THE TEST)	KEY ROLES (EC / ERT ETC)

EVALUATION OF THE PIRMP TEST	WORKERS	EMERGENCY CONTROLLER	EMERGENCY RESPONSE TEAM
What was the response/feedback to the test?			
Did everyone perform their duties correctly and effectively? Did they follow the PIRMP?			
Does the training need to be changed or improved?			
Are there any other actions/comments from the test?			

Detail any:

Issues or problems arising from the test in the table below.

Actions required, the person responsible and the date the actions must be completed by:

<b>PART B: ACTIONS FROM THE PIRMP TEST</b>				
<b>Issue</b>	<b>Action to be taken</b>	<b>Required completion date</b>	<b>Person to complete the action</b>	<b>Actual completion date</b>

<b>PART C: WORKER ATTENDANCE RECORD</b>		
	<b>Name</b>	<b>Signature</b>
1		
2		
3		
4		
5		
6		
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18		

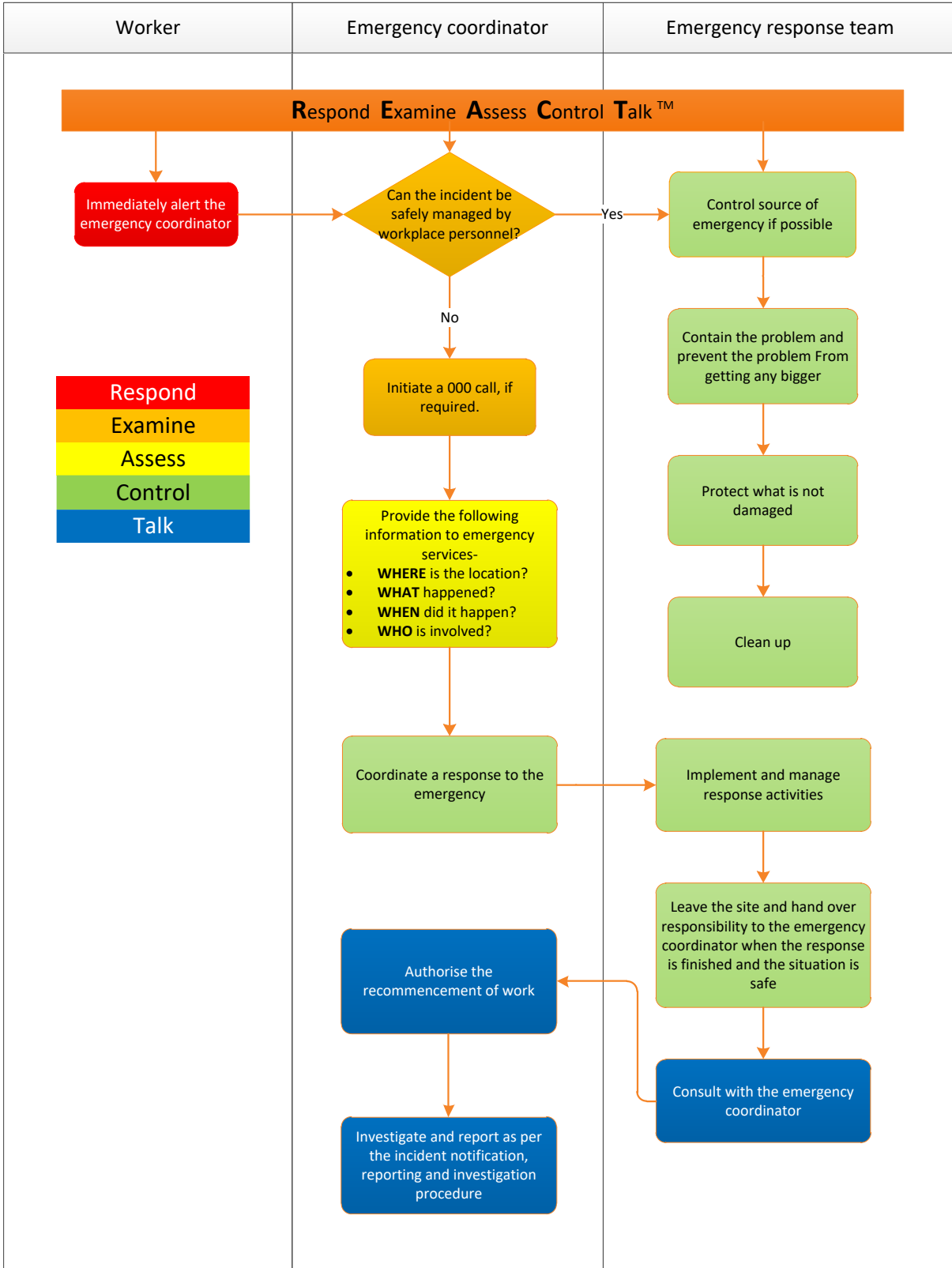
## Appendix C: PIRMP compliance table

Clause 98C(1) of the General Regulation states that the PIRMP must include the requirements listed in the below:

COMPLIANCE REQUIREMENT.	COMPLIANCE
a) a description of the hazards to human health or the environment associated with the activity to which the licence relates	Section 6
b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	Section 6
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
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
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: <ul style="list-style-type: none"> <li>(i) are responsible for activating the plan, and</li> <li>(ii) are authorised to notify relevant authorities under section 148 of the Act, and</li> <li>(iii) are responsible for managing the response to a pollution incident</li> </ul>	Section 3
h) the contact details of each relevant authority referred to in section 148 of the Act	Section 4
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 licence relates or where the scheduled activity is carried on	Section 5
j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Section 8
k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be	Appendix A

COMPLIANCE REQUIREMENT.	COMPLIANCE
affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises	
l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk	Appendix D
m) the nature and objectives of any staff training program in relation to the plan	Section 10
n) the dates on which the plan has been tested and the name of the person who carried out the test	Appendix B
o) the dates on which the plan is updated	Document Control
p) the manner in which the plan is to be tested and maintained.	Section 10 Section 11

### Appendix D: Immediate action plan



## Appendix E: Website required PIRMP information

LIST OF RELEVANT AUTHORITIES	
<b>Fire and rescue NSW / rural fire service (RFS)</b>	000 (For pollution incidents that present an immediate threat to human health or property)  1300 729 579 (For pollution incidents that do not present an immediate threat to human health or property)
<b>NSW Environmental Protection Authority (EPA)</b>	131 555
<b>NSW Health</b>	Western Sydney Local Health District (02) 8890 5555
<b>Safework NSW</b>	131 050
<b>Local Authority</b>	Blacktown City Council  (02) 9839 1961 Monday to Friday 8.00am - 5.30pm.  1300 133 491 After Hours Assistance
<b>Transport for New South Wales (TfNSW)</b>	Contact: Ryan Georgette  Phone: 0413 368 148  Email: Ryan.Georgette@transport.nsw.gov.au

In the event of a notifiable pollution incident, and dependent upon nature and scale, decisions to notify neighbours and the local community will be made in consultation with regulatory authorities.

In the event of an incident the following methods of communication shall be employed by the Community Relations Manager (CRM) depending on the severity and nature of the incident.

- Phone calls;
- Media releases (radio/television/newspaper/internet);
- Site visits/door knocking; and
- Letter box drops.

The extent of the communications with the neighbours and the community will depend on the:

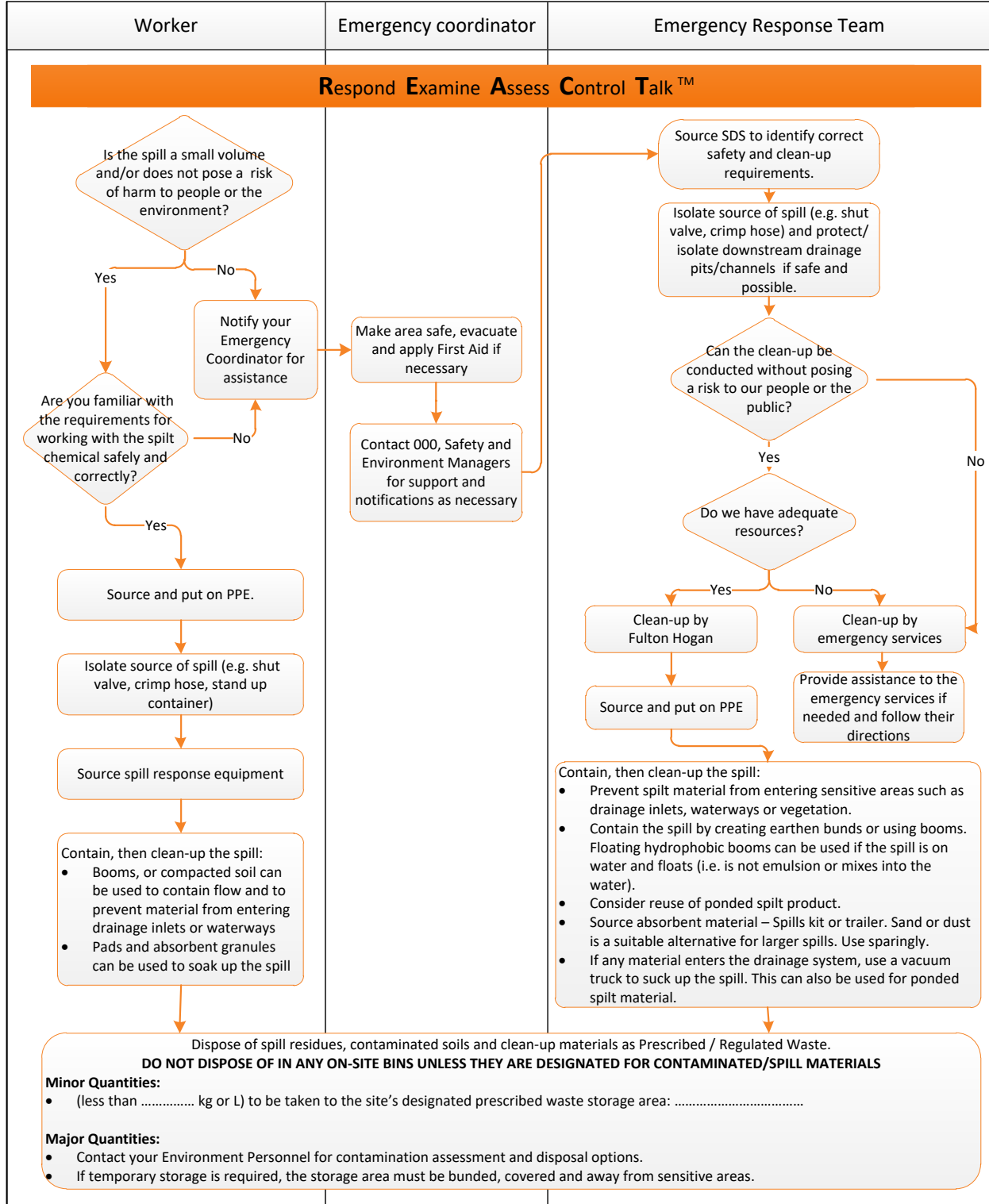
- The magnitude of the emission or discharge;
- Type of pollutant;
- What that pollutant may impact – water, land;
- The potentially impacted area;
- Weather conditions; and
- Potential duration of the impact.

In all cases Fulton Hogan will attempt to provide early warning to directly affected premises by a phone call or a site visit. Early warning will include details of what the incident is, how those affected will need to respond, as well as providing important advice such as avoiding contact and use of affected land/waterways. This information will be given on a case by case basis.

If early warning is not possible Fulton Hogan will provide notification during and after an incident. Fulton Hogan will advise those affected with appropriate information, advice and updates.

## 12. Appendix F: Incident and Emergency Response Flowcharts

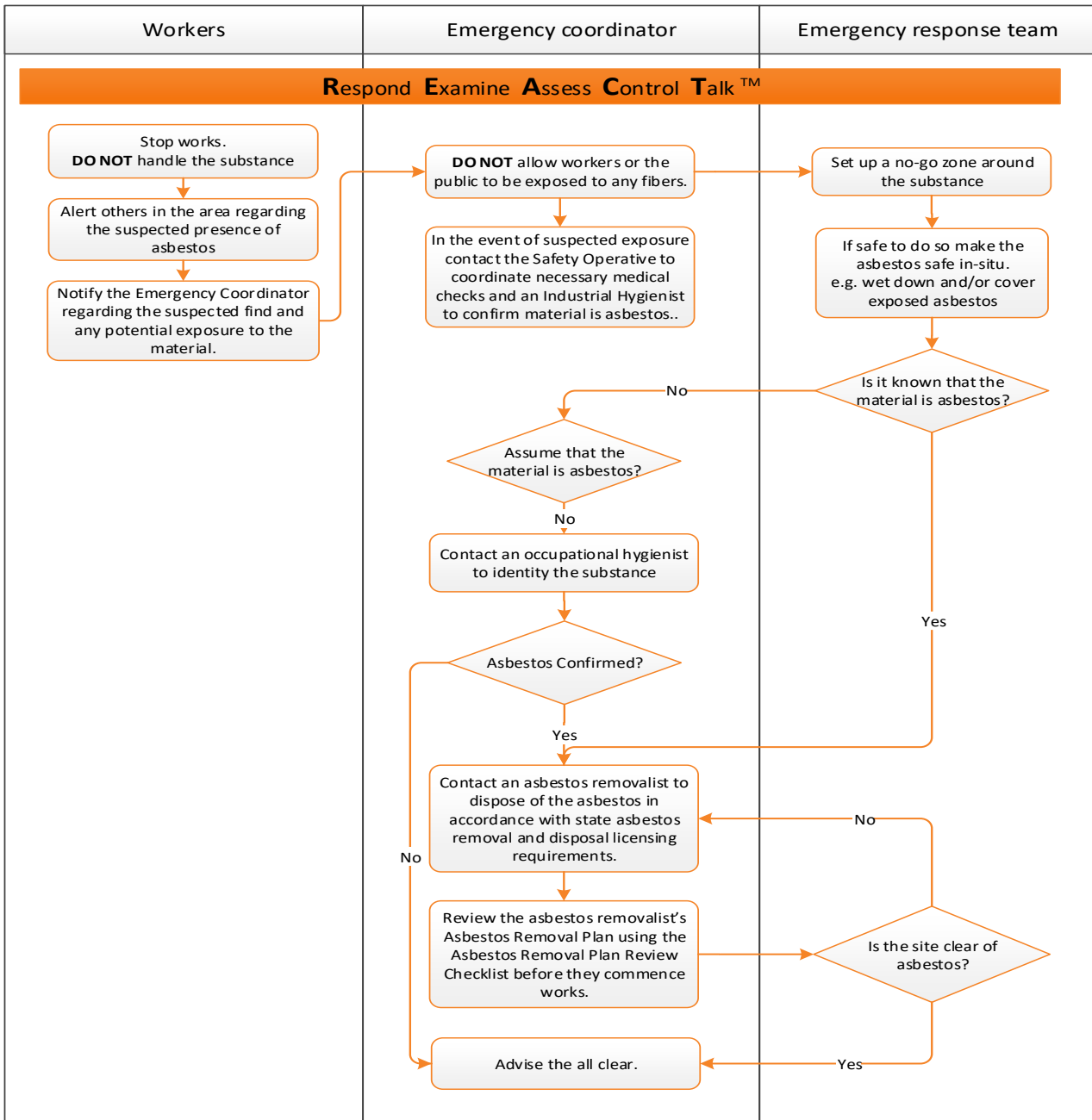
### Chemical, Oil and Fuel Spills - AU



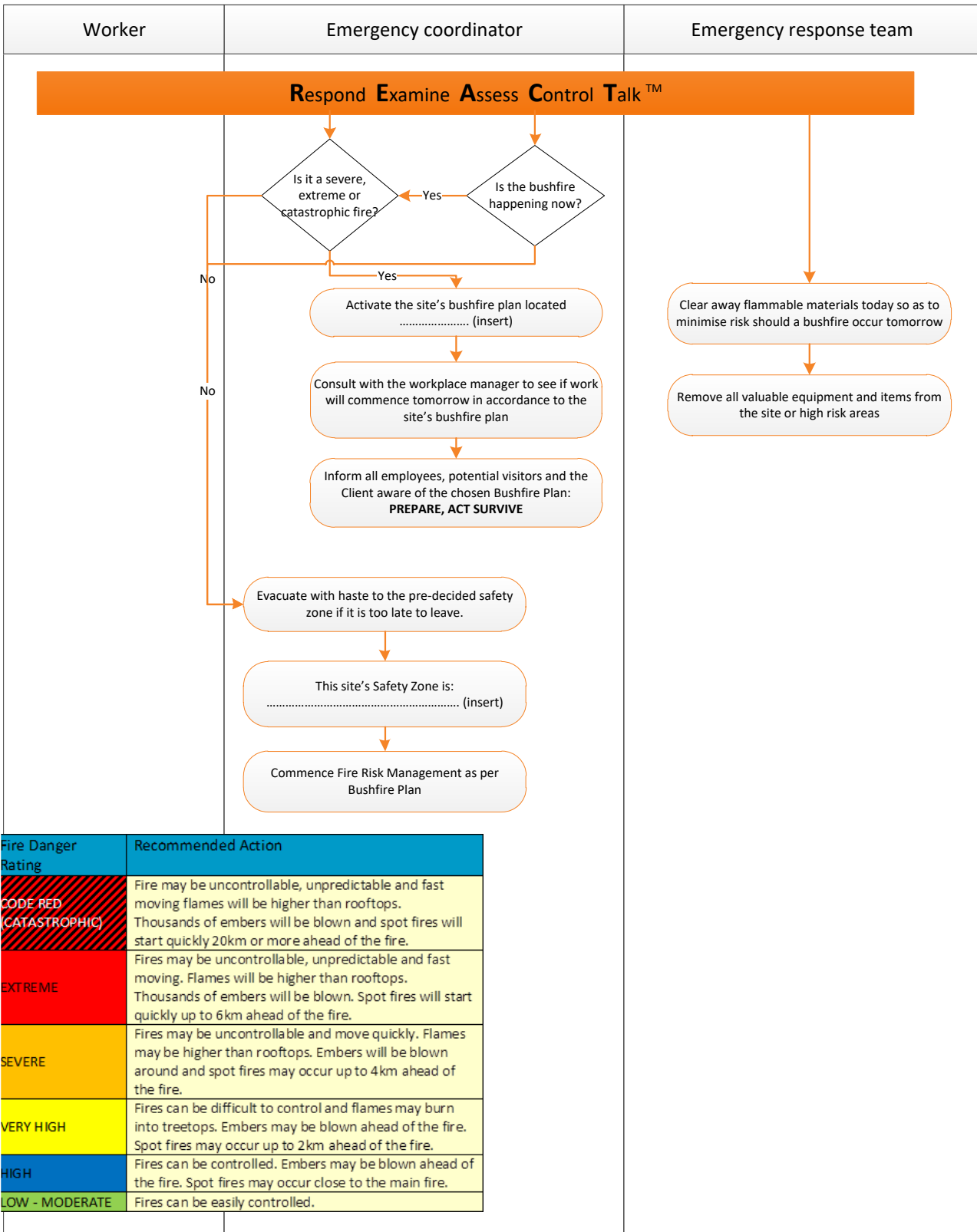
**Asbestos**

This flowchart must be followed if you come across a substance that you suspect or is known to contain asbestos.

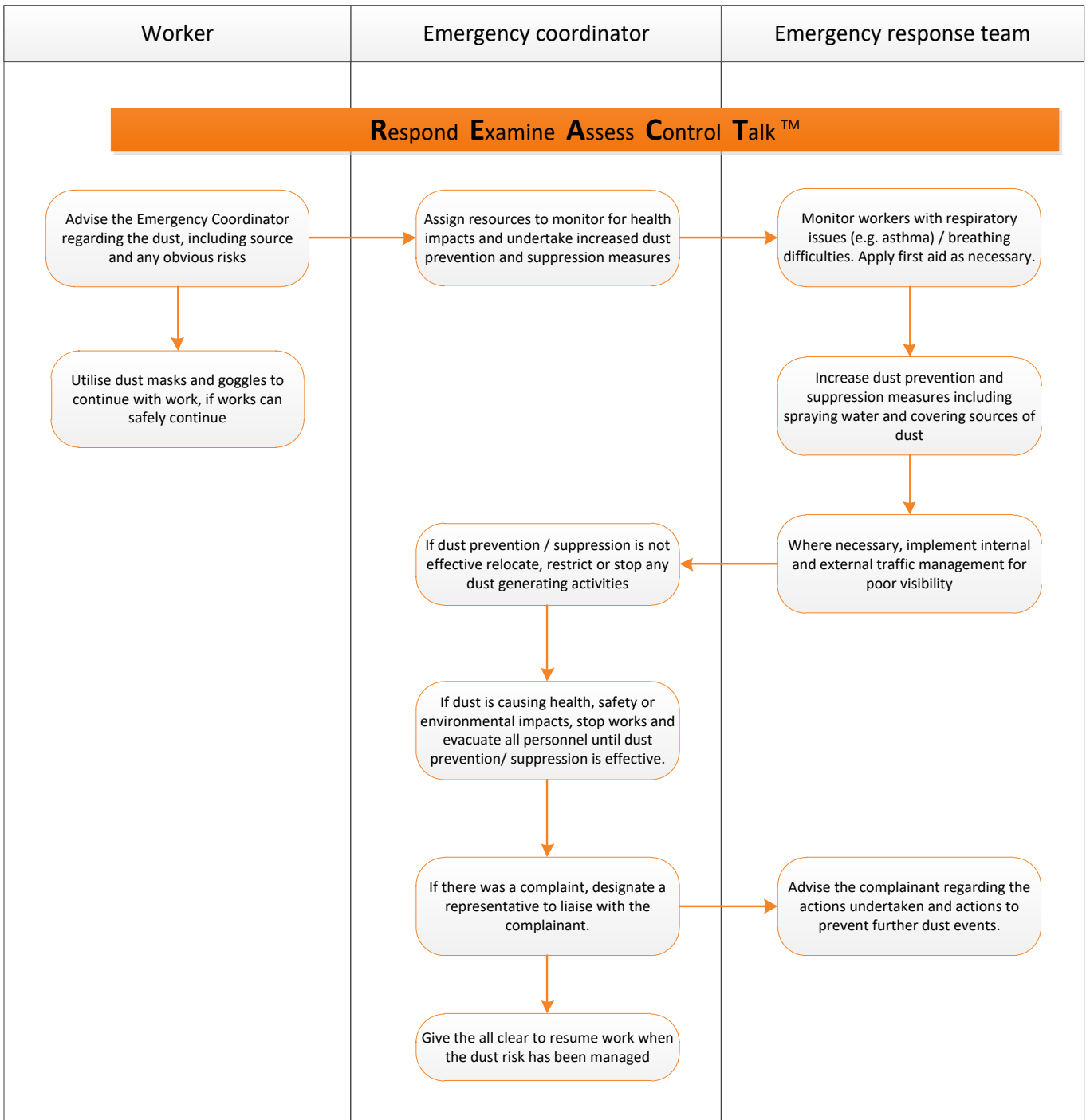
**What to look out for:** Asbestos was used in a wide range of building products and materials up until the mid-1980s. Products that may contain asbestos include pipe lagging, boiler insulation, fire retardant material on steel work, sprayed insulation, asbestos cement sheet, asbestos cement moulded products (e.g. water pipes and telephone pit lining), and bitumen-based water proofing and vinyl floor tiles. See: <http://www.deir.qld.gov.au/asbestos/general/where-found/photogallery.htm> for photos of typical items containing asbestos.



Bushfires



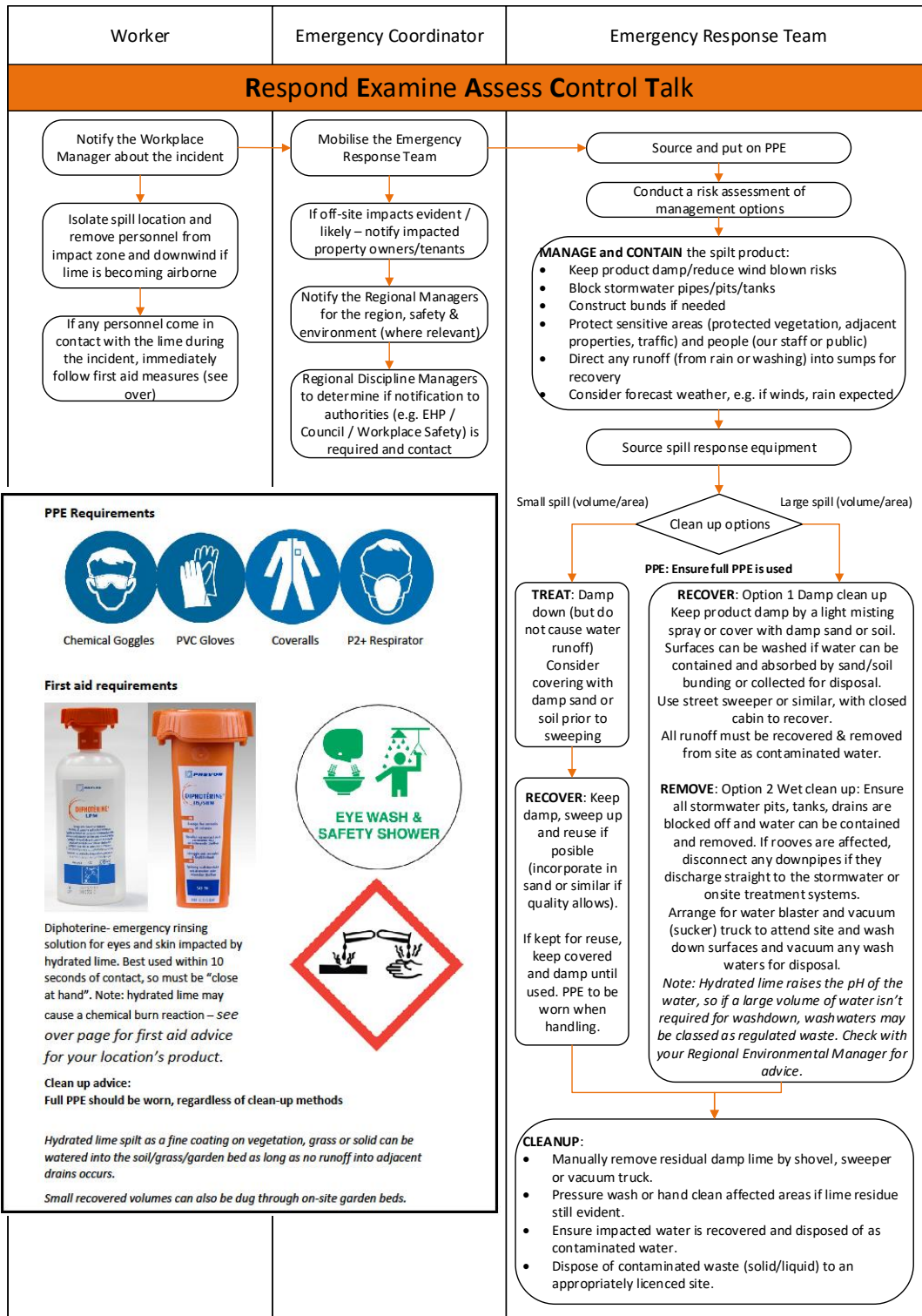
Extreme dust/smoke



Hydrated lime spill

This flowchart applies to incidents where hydrated lime is spilled or released. This can be caused by overfilling silos, failure of control devices, pipes or valves, tanker failure, profiling lime stabilised road bases, damage to silos, bins, bags or other containment devices.

*Note: Hydrated lime is highly alkaline and should be handled and first aid applied in accordance with the SDS and chemical risk assessment.*



Response kits are located;

- 1. *Main site compound (diphoterine / Response PPE and diphoterine)*

*Note: Hydrated lime is highly alkaline and should be handled and first aid applied in accordance with the SDS and chemical risk assessment*

## HYDRATED LIME



**Hazard Statement (s)**

H315 Causes skin irritation. H318 Causes serious eye damage.

**Precautionary statement – Response**

EYES: P321 The use of diphoterine has been shown to significantly reduce the risk of permanent injury. It is essential that the diphoterine is used as quickly as possible in order to obtain the maximum benefit from its absorbent and neutralising properties. As quickly as possible means within 10 seconds of contact with lime. Seek immediate medical attention while treating with diphoterine. P310 Immediately call a POISON CENTER or doctor/physician. SKIN: P321 Flush skin and hair with diphoterine. P332+P313 If skin irritation occurs: Get medical advice/attention. P362 Take off contaminated clothing and wash before reuse.

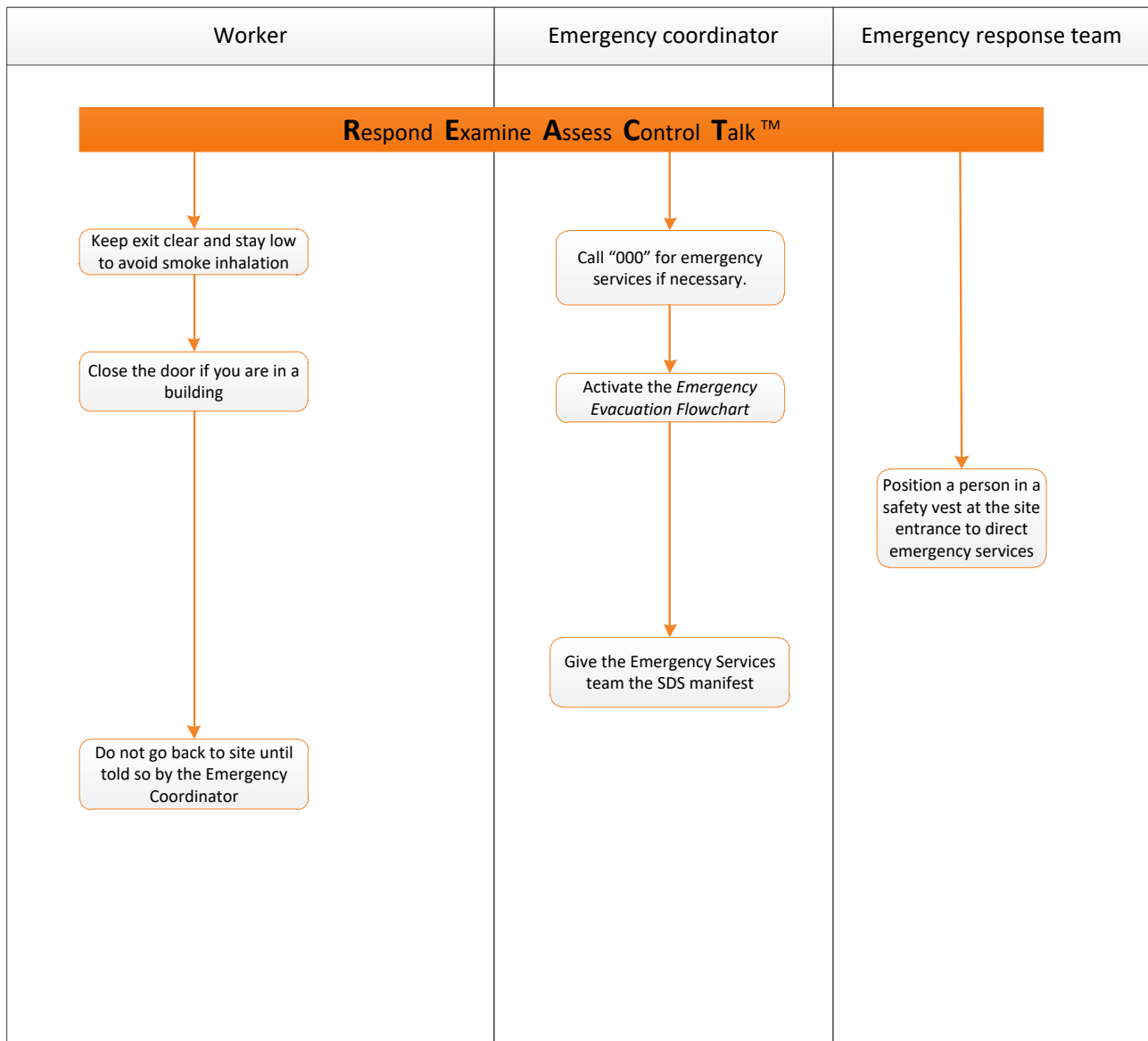
**Precautionary statement – Prevention**

P264 Wash skin thoroughly after handling. P280 Wear protective gloves/protective clothing/eye protection.

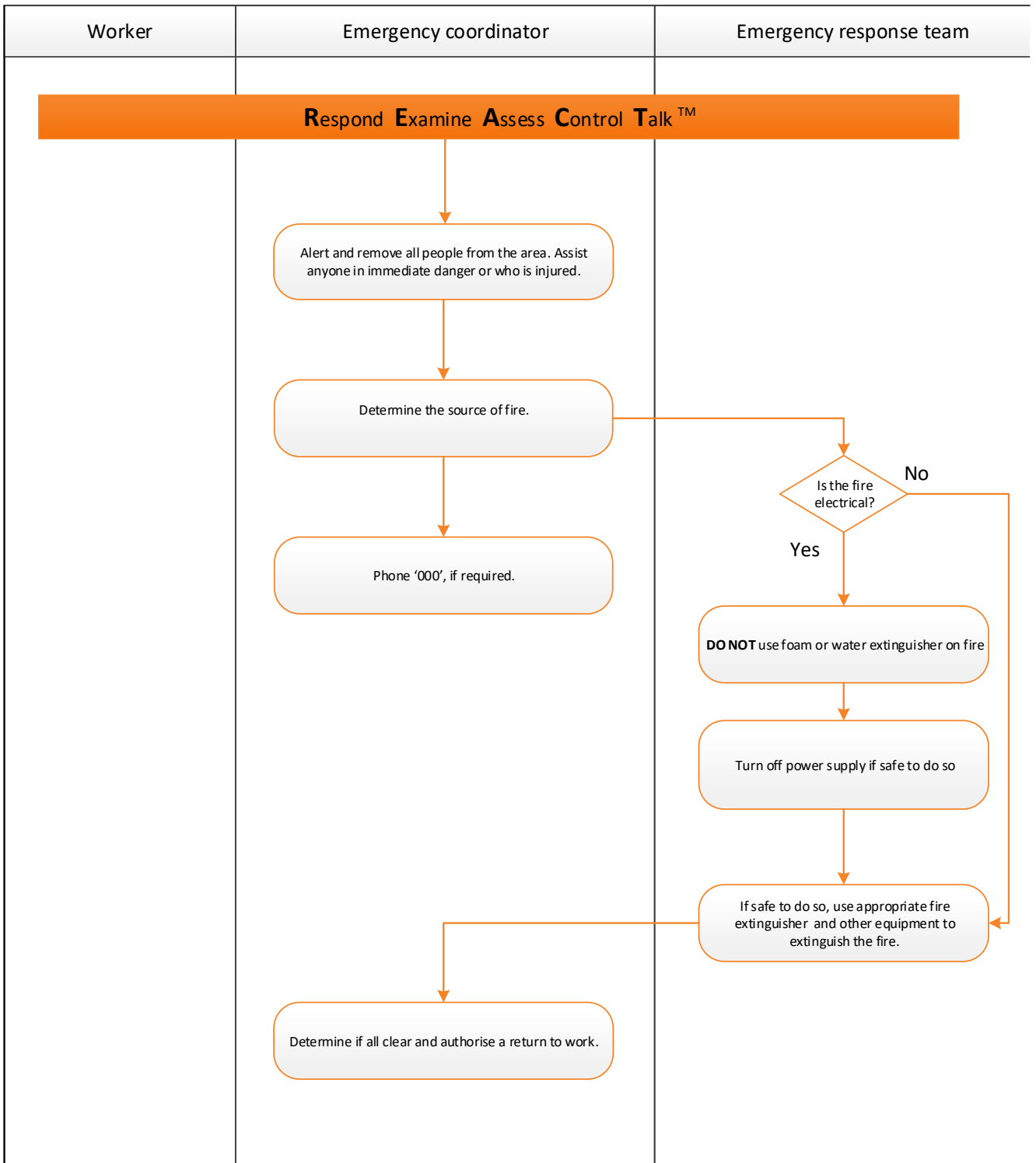
**EXAMPLE ONLY – use local product’s “decanted label” from Chemwatch – see your Safety Manager for assistance if required.**

DG Class:	Sub.Risk :	UNNO: None Allocated	HAZCHEM:
Proper Shipping Name: None Allocated			
Company Name : SIBELCO AUSTRALIA LIMITED			SDS: LPVT1

Major fires or explosions

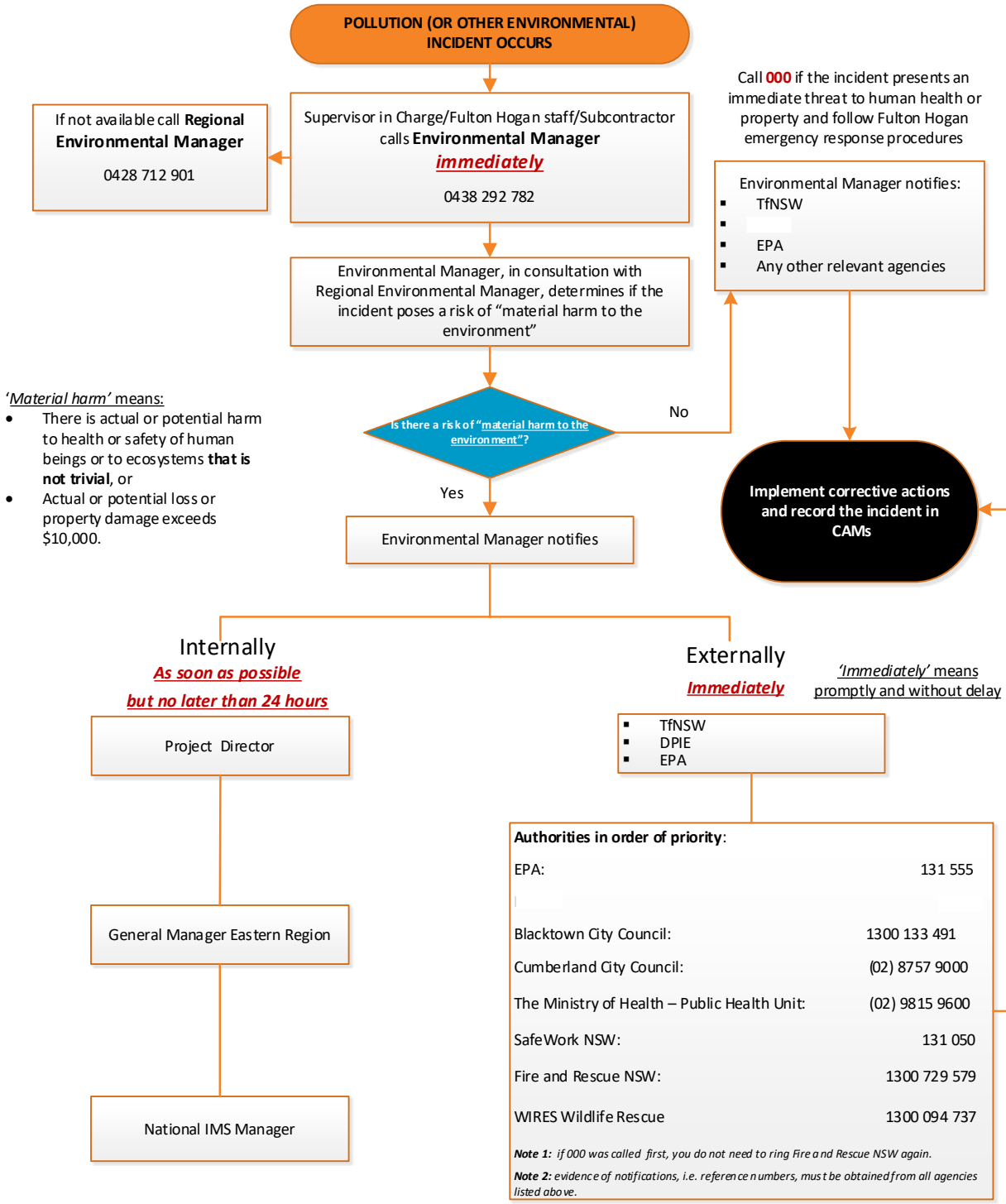


Minor fires



Type of Fire	Extinguisher Type	Identify by
Paper, cardboard, rubbish	Water	Solid Red
Oil, Fuel	Foam	Red with blue band or label
Electrical, Oil, Fuel, Gas	Powder	Red with white band or label
Electrical, Oil, Fuel, Paint, Liquid	CO2	Red with black band or label
Electrical	Vaporising Liquid	Red with yellow band or label

Pollution or other environmental incident notification protocol



**'Material harm' means:**

- There is actual or potential harm to health or safety of human beings or to ecosystems **that is not trivial**, or
- Actual or potential loss or property damage exceeds \$10,000.

**Important:**  
If a pollution incident occurs, all necessary actions should be taken to minimise the extent and any adverse effects of the release. These actions must be implemented **as soon as it is safe to do so**. If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service must be contacted first by calling 000. Other agencies must still be contacted after that to satisfy POEO Act notification obligations.

Storms and flooding

