

8 WASTE MANAGEMENT PLAN

This section of the OEMP seeks to ensure the appropriate handling, storage and disposal of waste generated during operations at this site. The plan has been developed in line with the waste avoidance and minimisation objectives of our Environmental Policy (Procedure 3102 – Appendix 3); and the intent of both the NSW *Waste Avoidance and Resource Recovery Act 2001* and the NSW Environment Protection Authority (EPA) publication *Environmental Guidelines: Assessment, Classification & Management of Liquid & Non-Liquid Wastes* (EPA Guide).

This plan has also been written to meet the requirements of consent condition 7.5(d):

As part of the Operation Environmental Management Plan for the development, required under condition 7.4 of this consent, the Applicant shall prepare and implement the following Management Plans:

A **Waste Management Plan** to outline measures to ensure the appropriate handling, storage and disposal of wastes generated during operations at the site. The plan shall be prepared in consultation with Council, and shall include, but not necessarily be limited to:

- i. identification of the types and quantities of waste that would be generated during operations, and the areas in which waste will be stored prior to removal;
- ii. standards and performance measures for dealing with this waste;
- iii. a detailed description of how this waste would be reused, recycled and, if necessary, appropriately treated and disposed of in accordance with the EPA's guidelines on the *Assessment, Classification and Management of Liquid and Non-Liquid Waste*;
- iv. a description of how the effectiveness of these actions and measures would be monitored over time; and
- v. a description of what procedures would be followed to ensure compliance if any non-compliance is detected.

8.1 WASTE TYPES AND QUANTITIES

Waste generated by Redox can be divided into typical and atypical waste streams.

8.1.1 TYPICAL WASTES

Typical wastes are generated on a regular basis, these include office paper, packaging, shrink wrapping, stationary and kitchen putrescible wastes. These wastes are non-liquid and can be classified as inert or solid within the EPA Guide.

8.1.2 ATYPICAL WASTES

Atypical wastes are generated on an irregular/accidental basis, usually following damage to chemical product/packaging; although empty drums and Intermediate Bulk Containers (IBC) sent for cleaning may be considered in this section. All non-liquid wastes are classified according to the following categories in ascending order; inert, solid, industrial or hazardous waste. In addition, liquid wastes are classified as either hazardous, group A or aqueous liquid waste. However, due to the varied nature of chemical products and their hazardous properties, the Regulatory Affairs Coordinator is required to classify all atypical waste products individually in accordance with the EPA Guide and Environment Protection Licence (EPL) No. 12041.

Liquid waste from the stormwater retention system on site requiring disposal shall be treated as Group A waste in accordance with Procedure 3402 in section 8.7 of this OEMP.

According to section L5.3 of the EPL No. 12041 issued for this site by the NSW Department of Environment and Conservation (DEC) the only hazardous and/or industrial and/or Group A waste types that may be generated on site include:

- Acidic solutions or acids in solid form (B100)
- Basic solutions or bases in solid form (C100)
- Non-toxic salts (D300)
- Zinc compounds (D230)
- Waste oil/water, hydrocarbons/water mixtures or emulsions (J120)
- Containers and drums which are contaminated with residues of substances referred to in this list (N100)
- Surface active agents (Surfactants) (M250)
- Boron compounds (D310)
- Cadmium; cadmium compounds (D150)
- Chromium compounds (hexavalent and trivalent) (D140)
- Cobalt compounds (D200)
- Copper compounds (D190)
- Ethers (G100)
- Phenols, phenol compounds including chlorophenols (M150)
- Phosphorous compounds excluding mineral phosphates (D360)
- Selenium; selenium compounds (D240)
- Waste chemical substances from research and development (T100)
- Fire debris and fire washwaters (N140)
- Halogenated organic solvents (G150)
- Inorganic fluorine compounds excluding calcium fluoride (D110)
- Inorganic sulfides (D330)
- Isocyanate compounds (M220)
- Lead; lead compounds (D220)
- Nickel compounds (D120)
- Organic phosphorous compounds (H110)

- Organic solvents excluding halogenated solvents (G110)
- Waste mineral oils unfit for their original use (J100)

Whilst it is possible to predict the types of typical wastes that may be generated on site, quantities of atypical wastes cannot be predicted due to the irregular nature of their generation. Condition L5.4 and L5.5 of the EPL No. 12041 sets a limit on the amount of hazardous, industrial and/or Group A waste generated on the premise per year at 100 tonnes or less. At any one time the quantity stored on site must not exceed 50 tonnes.

In the calendar year of 2004, the Redox Wetherill Park site generated 41 tonnes of hazardous, industrial and/or Group A waste; this volume consisted of damaged or off specification product/packaging as well as the estimated quantities of residue in empty packaging requiring reconditioning (i.e. 20 kg per empty drum and 65 kg per empty IBC). Note that these estimates of residue are conservative and therefore the actual amount of waste generated by the site is predicted to be less than 41 tonne.

8.2 WASTE STORAGE

Typical wastes are stored in general refuse office bins and regularly moved by warehouse personnel into two 4.5m³ bins provided by a DEC licensed waste transport company. These bins are emptied on site into waste transport vehicles weekly and taken to a DEC licensed solid landfill. Redox proposes to continue this practice, although the number of bins on site may vary due to demand.

Empty packaging (drums or IBC) requiring cleaning, damaged packaging, and damaged product requiring disposal will be stored within a designated area of a warehouse suitable for the storage of that type of material; i.e. packaging that has previously contained Class 8 or damaged Class 8 product requiring disposal will be stored within a Class 8 warehouse unit. All units are banded to prevent spills leaving the warehouse. No packaging, pallets or damaged product will be stored outside warehouse storage spaces; no pallets will be stored in class 3 or 5.1 warehouses. Under future development empty drums may be stored in the roofed area adjacent to the decanting area and tank farm.

Chemical product that is spilt during operations is cleaned up immediately, placed into heavy duty plastic bags, labelled, and thrown into wheelie bins designated for that class of product (for later disposal) in accordance with Procedure 3401 – Spill Procedure in section 8.9 of this plan. These bins will also be kept within a designated section of a warehouse specific to that class of product.

8.3 STANDARDS AND PERFORMANCE MEASURES

In order to achieve its waste avoidance and minimisation objectives set in Procedure 3109 – Environmental Policy referred to in Appendix 3 of this plan, Redox encourages its employees to follow the below hierarchy of waste management principles in all aspects of operation:

1. Reduce/Avoid
2. Re-use
3. Recycle/Reprocess
4. Dispose of in accordance with Procedure 3402 - Waste Management & Disposal, refer section 8.7 of this plan.

Redox has recently developed a system to record waste types, quantities and disposal methods for all waste streams in the form of a spreadsheet (refer Procedure 3402 – Waste Management & Disposal in section 8.7 of this plan). This spreadsheet and good record keeping of disposals allows Redox to obtain the following information:

- Inert and solid waste taken directly to landfill,
- Disposal quantities of all chemical products and packaging,
- DEC tracked hazardous, industrial and group A wastes,
- Disposal weights of solid and recycling wastes removed by general waste contractor.

This record keeping demonstrates a step towards better waste management, as it will allow the establishment of standard/normal waste levels. Records of waste quantities will allow Redox to assess the performance of its operations in line with the above waste management principles to avoid and minimise waste requiring landfill.

Recycling of paper and cardboard is a prime example of our commitment to avoiding and minimising waste. The hierarchy of the waste management principles have been applied to this area of waste in the following way;

1. Avoid printing of unnecessary documents/emails (Procedure 3109 – Environmental Policy)
2. Re-use the reverse side of paper (Procedure 3109 – Environmental Policy)
3. Separate paper/cardboard waste for recycling (Procedure 3402 – Waste Mgmt & Disposal)
4. No paper is disposed of to landfill (Procedure 3402 – Waste Mgmt & Disposal).

Whilst standard/normal levels of waste cannot be predicted for atypical generation of damaged chemical products, the waste management principles can still be applied to Redox operations, in the following way;

1. Redox can avoid and reduce waste generation by careful product handling and storage.
2. Damaged chemical products can be repackaged and sold at reduced or no cost in every circumstance, in preference to disposal.
3. The use and recycling of empty drums and IBC, where otherwise raw materials are used to create new packaging.
4. Correct and lawful disposal of wastes in accordance with classification and tracking procedures of the EPA Guide.

8.4 RE-USE, RECYCLE, TREATMENT AND DISPOSAL

In every circumstance Redox will attempt the sale of damaged chemical products at reduced or no cost, in preference to disposing of these to landfill. This is usually possible where damage has not been severe or the product can be down classified to a lower specification, i.e. from food grade to technical grade. This is in line with our Environmental Policy (Appendix 3) objectives for waste avoidance and minimisation, and could be considered actions towards re-use or recycling of an otherwise waste product. This is the responsibility of the Product Manager per Procedure 3402 – Waste Management & Disposal in section 8.7 of this plan.

Redox recycle paper/cardboard and aluminium cans in accordance with Procedure 3404 – Recycling in section 8.8 of this plan. Redox also arrange for the recycling of chemical packaging i.e. empty drums and IBC,

by sending these to cleaning and reconditioning facilities so that they may be reused within industry, refer Procedure 3402 – Waste Management & Disposal in section 8.7 of this plan for comprehensive details.

There will be no treatment processes undertaken by Redox of any damaged chemical product classified as waste, these processes will be carried out by DEC licensed waste facilities, if required. Disposal will be in accordance with the EPA Guide, EPL No. 12041 and Procedure 3402 – Waste Management & Disposal in section 8.7 of this plan.

8.5 MONITORING THE EFFECTIVENESS OF WASTE MANAGEMENT

As mentioned previously the waste disposal spreadsheet and records will allow the establishment of standard/normal waste levels and trends in waste disposal. The Regulatory Affairs Coordinator, who will have experience in statistical analysis of data over time, will keep the site waste records. Programs and further waste management options, such as recycling or alternate packaging will be researched to continue to meet the waste avoidance and minimisation objective. In the future Redox may consider designating a section of the Annual Report to Environmental Reporting.

Each year an Annual Return is submitted to the DEC to show compliance or deviations from compliance with the EPL No. 12041. Methods for exception reporting for the movement of hazardous, industrial and/or Group A waste is included in Procedure 3402 – Waste Management & Disposal per section 8.7 of this plan. These reporting mechanisms allow Redox to review problems with waste disposal issues and hence assess the effectiveness of their procedures.

8.6 COMPLIANCE

An important aspect of waste management is compliance; it is the responsibility of the Store Manager and Regulatory Affairs Coordinator to ensure correct disposal methods is used by all employees. It is condition of employment at Redox that employees abide by procedures; those that relate to waste management are mentioned in this plan. Formal warnings and guidance will be issued to employees who contravene these procedures, where appropriate in accordance with Procedure 2512 – Employee Warning Procedure (Appendix3).

In addition, if deemed required a Problem Record will be raised to record the non-compliance and provide a record of the actions taken to rectify the problem; this will be undertaken in accordance with Procedure 3022 – Problems and Complaints (Appendix 3).

8.7 PROCEDURE 3402 – WASTE MANAGEMENT & DISPOSAL

1.0 PURPOSE

1.1 To describe the process by which Redox will handle, store, classify, transport and dispose of any waste materials, which include damaged and unsaleable chemical stock and chemical packaging.

2.0 SCOPE

- 2.1 This procedure describes the process of disposal for non-liquid & liquid waste and applies to waste generated by all Redox branches.
- 3.0 REFERENCES
- 3.1 NSW Protection of the Environment Operations Act 1997.
- 3.2 NSW Waste Avoidance and Resource Recovery Act 2001.
- 3.3 NSW Environmental Guidelines: Assessment, Classification & Management of Liquid and Non-Liquid Wastes.
- 3.4 VIC Environment Protection (Prescribed Waste) Regulations 1998.
- 3.5 VIC EPA Information Bulletin - Classification of Wastes (Publ. 448 09/05)
- 3.6 WA Environmental Protection (Controlled Waste) Regulations 2004.
- 3.7 QLD Environmental Protection (Waste Management) Regulation 2000.
- 3.8 SA Environment Protection (General) Regulations 1994.
- 3.9 NZ Resource Management Act 1991.
- 3.10 NZ Local Government Act 1974
- 3.11 NZ Hazardous Substance and New Organism Act 1996.
- 3.12 ACTDG - Australian Code for the Transport of Dangerous Goods by Road & Rail.
- 3.13 NZS 5433 - 1999 Transport of Dangerous Goods on Land.
- 3.14 SUSDP - Standard for the Uniform Scheduling of Drugs and Poisons.
- 3.15 Procedure 1506 - Sundry Purchase Orders.
- 3.16 Procedure 2706 - New Suppliers.
- 3.17 Procedure 3109 - Environmental Policy.
- 3.18 Procedure 3401 - Spill Procedure.
- 3.19 Procedure 3404 - Recycling.
- 4.0 DEFINITIONS
- 4.1 Waste - any discarded, rejected, unwanted, surplus or abandoned substance whether or not it is intended for disposal or recycling/reprocessing.
- 4.2 DG - Dangerous Goods defined within the ACTDG.
- 4.3 Poisons - Scheduled Drugs or Poisons defined within the SUSDP.
- 5.0 PROCEDURE
- 5.1 RESPONSIBILITIES AND AUTHORITY
- 5.1.1 The Regulatory Affairs Coordinator is responsible for classifying all waste, for obtaining disposal quote, for receiving all waste tracking documentation and reporting to environmental authorities where it is required.
- 5.1.2 The Transport Coordinator is responsible for booking waste onto runs, completion of Waste Transport Certificates (WTC) including completion by driver, waste facility and return to Regulatory Affairs Coordinator; and for maintaining a sufficient supply of WTC for each branch.
- 5.1.3 The Store Manager is responsible for ensuring that store personnel adhere to this procedure and that an effort is made to minimise waste and for ensuring that waste is fit for transport.
- 5.1.4 The Product Manager is responsible for exhausting all avenues for sale or give away of damaged or unsaleable stock before identifying it as requiring disposal in accordance with Redox's Environmental Policy -3109.

5.1.5 The Quality Assurance Clerk will establish new waste service providers in the system in accordance with procedure 2706.

5.2 WASTE CLASSIFICATION AND DISPOSAL METHODS

5.2.1 General office and warehouse rubbish including stationery, plastic, glass, food, shrink wrapping, empty chemical packaging (that has not contained DG or Poison) can be disposed in the waste bins on each site.

5.2.2 Non-compactable items such as empty drums, empty IBC, pallets, large timber pieces, metal, concrete and bricks will be sent directly to either landfill, drum reconditioners or waste treatment facilities. The Store Manager is responsible for informing the Regulatory Affairs Coordinator when there are empty drums on site that require recycling or disposal.

5.2.3 Paper, cardboard and aluminium drink containers will be recycled in accordance with Procedure 3404. In some branches, glass and plastic may be recycled.

5.2.4 Chemicals (including samples) or chemical packaging that has contained DG, Poison or Liquid will be transported and disposed by suppliers who are licensed to accept this waste for treatment by the environmental authority in that jurisdiction. These are never acceptable to be disposed in the waste bins on site or to landfill.

5.2.5 Solid chemicals that are not DG or Poison will be individually classified by the Regulatory Affairs Coordinator with the aid of waste facility operators in order to determine if they are able to go to landfill. Where landfill is not lawful for the substance, it will be sent to a licensed waste treatment facility.

Exemptions may be made at the discretion of the Regulatory Affairs Coordinator for sample quantities that would be acceptable for landfill in the jurisdiction where the waste bins on site are to be disposed.

5.3 STORAGE OF WASTE PRODUCTS

5.3.1 Spill/damaged chemical product shall be swept into plastic bags, labelled and thrown into the spill bins designated for waste for each store in accordance with Procedure 3401.

5.3.2 All chemical products requiring disposal shall be kept in secure packaging within the reject store area or spill bins designated for waste for each store.

5.4 DISPOSAL ARRANGEMENTS

5.4.1 The Regulatory Affairs Coordinator is responsible for the following:

a. Obtaining a quotation for the disposal of chemicals or chemical packaging.

b. Consulting with the Product Manager on the quotation and if agreed upon, raising a Sundry Purchase Order (Procedure 1506) for approval by a Company Director.

c. Requesting completion of Form 21157 for new suppliers, the details of which will be checked with the environmental authority and updated using the Quality option of Supplier details, e.g. licence numbers.

d. Inform waste service providers, Store Manager and Transport Coordinator of disposal date.

e. In NSW only, if the waste is subject to waste tracking per section 5.5 of this procedure, request a Consignment Authorisation Number (CAN) from the waste facility using Form 21152. For IBC cleaners and Drum Reconditioners a CAN should be requested to be valid for a 12 month period.

- 5.4.2 The Store Manager will ensure that chemicals or chemical packaging is fit and ready for transport by the set date. For DG chemicals, transport will be in accordance with the ACTDG or NZS: 5433.
- 5.4.3 The Transport Coordinator will ensure that the waste is booked onto a run and that the WTC is completed if required by section 5.5 of this procedure.
- 5.5 WASTE TRACKING REQUIREMENTS (not applicable to WA or NZ).
- 5.5.1 Any chemical or chemical packaging classified by the Regulatory Affairs Coordinator as one of the following must be transported with a Waste Transport Certificate (WTC) appropriate to the jurisdiction.
- a. NSW - Hazardous, Industrial or Group A (Waste Data Form 21118);
 - b. VIC - Prescribed;
 - c. QLD - Regulated;
 - d. SA - Listed.
- As a general guide any material that is not suitable for disposal to landfill will require a WTC. Chemicals or chemical packaging that has contained DG, Poison or Liquid will always require a WTC.
- 5.5.2 For all IBC that are sent to be cleaned and/or disposed a WTC is to be completed by the Transport Coordinator and sent with the IBCs. IBC that are not being cleaned before they are refilled are exempt from this requirement.
- 5.5.3 The Transport Coordinator is responsible for ensuring the following steps are completed during each disposal:
- a. Ensure that only licensed waste transporters are used, in NSW these include Redox vehicles RCS791, SED998 and TRN718.
 - b. Completion of the WTC as requested by the Regulatory Affairs Coordinator, this should be done automatically for IBC transfers or drums sent to reconditioners.
 - c. Ensure the driver signs the WTC and that a hard copy accompanies the waste to the waste facility.
 - d. Ensure the driver is aware they need to request the form to be completed by the waste facility; in NSW the driver is to return the WTC to the Transport Coordinator.
 - e. Where carbon pads are used, forward the relevant copies to environmental authorities.
 - f. Ensure that the Regulatory Affairs Coordinator receives a copy of all completed WTC; these will be kept on file for four years.
 - g. Reporting to the Regulatory Affairs Coordinator where waste is rejected or does not arrive at the waste facility, or where a spill occurs during transport, the details of clean-up methods and the disposal point of any clean-up materials.
 - h. Advise the Regulatory Affairs Coordinator when there are only 10-15 carbon copies, online certificates or waste data forms available, so that more can be ordered.
- 5.6 REPORTING
- 5.6.1 The Regulatory Affairs Coordinator will ensure the following reporting is completed:
- a. Maintenance of a permanent spreadsheet record of all waste disposals, at Company Documents\Quality Assurance\Environmental Management\WasteLOG.
 - b. In VIC, an annual report at 30 June, if there were 6 or more WTC completed in one financial year, to be submitted to the environmental authority.

c. In NSW, quarterly reports for Environment Protection Licences 10633, 12041 and 11872, to be submitted to the environmental authority.

d. In NSW, reporting incidents to the environmental authority where waste is transported without a WTC, is rejected or does not arrive at the waste facility, a spillage occurs during transport or written confirmation of receipt of waste and completed WTC is not received within 21 days of despatch. Report will be made using an exception report per Environment Protection Licences 10633, 12041 and 11872.

6.0 DOCUMENTATION

6.1 Form 21157 - Waste Disposal Quality Questionnaire

6.2 Form 21152 - NSW Waste Consignment Authorisation

6.3 Form 21118 - NSW Waste Data Form

7.0 PROCEDURE RESPONSIBILITY

7.1 Refer Review/Approval Status.

8.0 SUMMARY OF CHANGES

8.1 23.01.03 Rev. 1 Initial Issue.

8.2 19.06.03 Rev. 2 Complete Review.

8.3 01.07.03 Rev. 3 Amended some minor spelling errors.

8.4 16.11.04 Rev. 4 Complete review of AUST & NZ legislation & procedure.

8.8 PROCEDURE 3404 - RECYCLING

1.0 PURPOSE

1.1 To describe the process and extent of recycling activities as conducted by Redox Pty Ltd staff.

2.0 SCOPE

2.1 This procedure describes the process for disposal of paper and aluminium materials as they apply to the Head Office site; and disposal of paper materials for the Melbourne and Perth sites.

3.0 REFERENCES

3.1 Procedure 3109 - Environment Policy

3.2 Procedure 3402 - Waste Management & Disposal

4.0 DEFINITIONS

4.1 Recycling - materials that are reprocessed and/or reused instead of going to landfill.

5.0 PROCEDURE

5.1 RESPONSIBILITIES AND AUTHORITY

5.1.1 All Redox staff and contractors are responsible for complying with this procedure.

5.1.2 Senior Management is responsible for ensuring this procedure is followed and for encouraging waste minimisation to reflect Redox's Environmental Policy (refer 3109).

5.1.3 The Site Environmental Officer is responsible for ensuring that this procedure is followed.

- 5.1.4 The Purchasing Officer is responsible for arranging disposal of the materials via waste transporters.
- 5.1.5 The Store Manager and Storemen are responsible for transferring recyclable material from office bins to final disposal bins.

5.2 RECYCLING OF PAPER AND CARDBOARD PRODUCTS

- 5.2.1 Paper and cardboard products that are listed in the YES column of the table below are to be placed in the designated blue and green office bins and those listed in the NO column are to go into normal rubbish bins.

Note: Cardboard milk cartons are to be rinsed out prior to disposal in paper recycling bins that have a plastic bag liner, to avoid bin residue and odour.

YES WE CAN RECYCLE	NO WE CAN'T RECYCLE
All office paper Fax and photocopy paper Photocopy paper wrappers and boxes Paper Binder Dividers Envelopes Manilla Folders Phone Books Shredded paper Newspapers, Magazines, Brochures Cardboard Boxes (collapse first) Cardboard Milk Cartons (rinsed)	Carbon Paper Thermal Fax Paper Paper towels Facial Tissues Waxed paper (lunch wrappers) Tissue Paper Metal and Plastic Report Binders

- 5.2.2 Warehouse cardboard and paper products may only be recycled if they have not come into contact with any chemical product.
- 5.2.3 Confidential documents are to be processed through the paper shredding machine prior to disposal in the paper and cardboard recycling bins. Shredded paper is moved to the outdoor recycling bin(s) by cleaners.
- 5.2.4 Paper and cardboard material from office bins will be transferred to the designated paper and cardboard bin by Store staff. Plastic liners should be removed and thrown in to rubbish bins.

5.3 RECYCLING OF ALUMINIUM CANS

- 5.3.1 All staff is required to place all aluminium drink containers in the designated bins with plastic bag liners in the marketing, shipping and warehouse kitchens. Containers are to be emptied of soft drink and rinsed with water prior to disposal.
- 5.3.2 Empty drink containers will be collected by warehouse personnel on a weekly basis.

6.0 DOCUMENTATION

- 6.1 Nil.

7.0 PROCEDURE RESPONSIBILITY

- 7.1 Refer Review/Approval Status

8.0 SUMMARY OF CHANGES

8.1 11.02.03 Rev. 1 Initial Issue.

8.2 30.06.06 Rev. 2 Amended 1.1, 2.1, 3.1, 5.1.4, 5.2.4 for minor changes.

8.9 PROCEDURE 3401 – SPILL PROCEDURE

1.0 PURPOSE

The purpose of this procedure is to:

- 1.1 Minimise the amount of spilled material and debris that is allowed to enter drains leading to the stormwater system; and
- 1.2 Describe the reporting procedure for spills with potential to enter drains leading to the stormwater system; and
- 1.3 Reduce the risk of environmental pollution and exposure to breaches and penalties under environmental pollution legislation.

2.0 SCOPE

2.1 This procedure is limited to all Redox Pty Ltd operated sites.

3.0 REFERENCES

- 3.1 Procedure 0109 - Using Problem System
- 3.2 Procedure 3009 - Handling, Storage, Packing, Preservation and Delivery
- 3.3 Procedure 3110 - Dust Control Management
- 3.4 Procedure 3402 - Waste Management and Disposal
- 3.5 Procedure 3405 - Water Release from Retention Basin
- 3.6 Procedure 3523 - Damaged Packages

4.0 DEFINITIONS

- 4.1 MSDS - Material Safety Data Sheet (Form 2147). Document issued to give advice concerning the safe handling of chemical products.
- 4.2 Non-reportable Area - concrete areas within the warehouse that are used for the storage of product, that do not drain directly to the on-site stormwater system (i.e. they are bunded areas or areas within warehouse buildings where a spill could not reach the stormwater drains).
- 4.3 Non-reportable Spill - spilt solid product less than 5kg.
- 4.4 Product - all chemical materials with an assigned Redox Product Code.
- 4.5 Reportable area includes:
 - a. Concrete driveway areas within the warehouse that drain directly into the on-site stormwater drainage system, and
 - b. Concrete areas in the immediate vicinity of the stormwater pit in E-Store at the Wetherill Park site; where spills have the potential to enter this pit.
- 4.6 Reportable Spill - a spill that occurs in a Reportable Area that is; any liquid product and/or greater than 5kg of solid product.
- 4.7 Site - Any Redox Pty Ltd operated site.

- 4.8 Spill Kit - spill stations located in each store, that aid in the containment and clean-up of chemical spills, includes spill sorb product.
- 5.0 PROCEDURE
- 5.1 RESPONSIBILITIES AND AUTHORITY
- 5.1.1 All personnel, including sub-contractors, are responsible for acting in accordance with this procedure.
- 5.1.2 Store Managers are responsible for inspecting spill kits and advising the Purchasing Officer of the materials required to replenish used items.
- 5.1.3 The Purchasing Officer is authorised to purchase materials and equipment as requested by the Store Manager to replenish the spill kits.
- 5.1.4 All Storeman are responsible for immediately cleaning up spilt chemical product in accordance with this procedure, whether or not the spill was caused by them.
- 5.1.5 The Site Environmental Officer is responsible for arranging disposals of spilt material.
- 5.2 SPILL CONTROL
- 5.2.1 SPILL CLEAN-UP
- Store staff is responsible for the immediate clean up of all spills (whether or not they caused the spill), in accordance with this section:
- consult or send for the relevant MSDS for the recommended clean-up procedures;
 - collect or send for the nearest spill kit;
 - take action to stop the source of the spill, or reduce by diverting the spill to safe containment, to the extent that personal safety will permit;
 - Spill Sorb will be applied to absorb liquid spills, some Dangerous Goods products may need to be neutralised before applying spill sorb in accordance with the manufacturer's recommendations;
 - never hose any product into stormwater drains;
 - use a shovel, broom and any necessary personal protective equipment to scoop spilt material into plastic spill bags. A plastic cable tie will be used to completely seal the plastic bag;
 - complete the label on each plastic spill bag with the correct product code and batch number, take note of the Dangerous Goods class if applicable;
 - take note of the location of the spill, i.e. store letter or driveway. Carry the used plastic spill bag(s) to the wheelie bins.
 - for Reportable Spills, report the spill per section 5.2.2;
 - The Site Environmental Officer will arrange disposals on the request of the Store Manager once bins are half full.
- 5.2.2 SPILL REPORTING
- Store staff is required to follow this section for Reportable Spills:
- Establish a Problem Record (as per Procedure 0109), and
 - Complete the Incident Report Form 21139 and ensure the form is given to the Site Environmental Officer, who will file it with the Problem Records Documentation.
- 5.2.3 Spills with the potential to leave the site via the stormwater system are dealt with in procedure 3405.
- 5.2.4 SPILL CONTROL EQUIPMENT

- a. If emergency equipment is used or borrowed for any reason it must be replenished or replaced immediately;
- b. Spill kits are to be inspected by the Store Manager on a weekly basis or immediately after use (Form 21110).
- c. The improper use or taking of items from spill kits without just cause will not be tolerated. All staff is hereby informed of the importance of these kits. The spill kits are not to be used for any other purpose.

6.0 DOCUMENTATION

- 6.1 Form 2147 - Material Safety Data Sheet
- 6.2 Form 21110 - Sydney Warehouse Inspection
- 6.3 Form 21139 - Incident Report Form
- 6.4 Form 21141 - Melbourne Warehouse Inspection
- 6.5 Form 21142 - Perth Warehouse Inspection

7.0 PROCEDURE RESPONSIBILITY

- 7.1 Refer Review/Approval Status

8.0 SUMMARY OF CHANGES

- 8.1 05.09.02 Rev. 1 Initial issue.
- 8.2 21.01.03 Rev. 2 Amended references to include Dust Control Management
- 8.3 11.02.03 Rev. 3 Amended minor and major spill sections to include reference to form 21139 and proc. 3523.
- 8.4 06.03.03 Rev. 4 Amended definitions, cleanup and reporting sections.
- 8.5 10.04.03 Rev. 5 Amended 4.0, 5.2.1, 5.2.2; removed 5.1.2, 5.2.3.
- 8.6 20.06.03 Rev. 6 Amended 5.2.1 and added 5.1.4 and 6.6.
- 8.7 21.07.03 Rev. 7 Added e. to Section 5.2.1.
- 8.8 22.03.04 Rev. 8 Added 5.1.5, Amended 5.2.1.
- 8.9 30.06.06 Rev. 9 Amended 2.1, 4.5, 4.7, 5.1.1, 5.2.1 and removed 6.6. Minor Changes.