Pollution Incident Response Management Plan

Tank Management Services

November 2018

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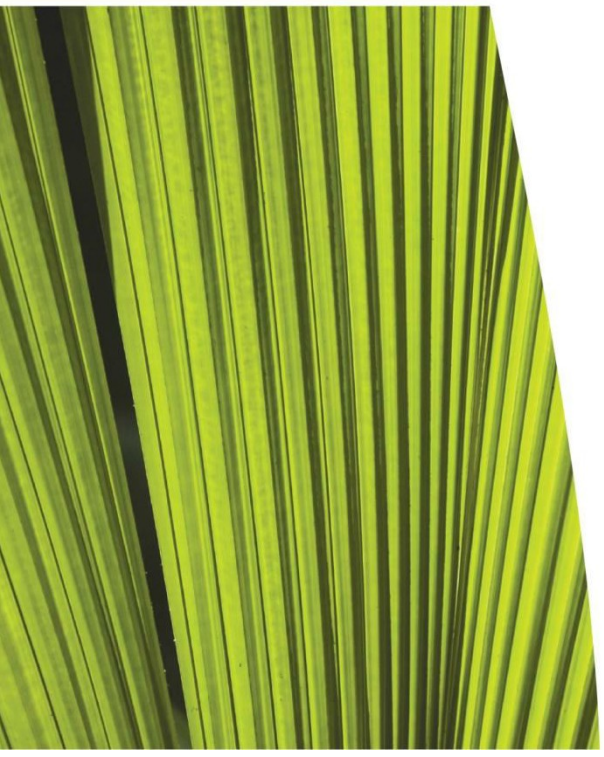

KMH ENVIRONMENTAL

Pollution Incident Response Management Plan

Prepared for:
Tank Management Services

Prepared by:
KMH Environmental
Level 12, South Tower
1-5 Railway Street
Chatswood NSW 2067

PO Box 5487
West Chatswood NSW 1515

Phone: (02) 9468 9300
Fax: (02) 8008 1600

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A	First draft	01 Nov 2012	J Dubash	S Pathammavong	
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2.0	Amendment to Personal Contact details	27 Oct 2016	P Mascall	A Alpen	A Alpen

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Glossary and Abbreviations

DECC	The NSW Department of Environment and Climate Change (now EPA)
EPA	Environment Protection Authority
IBC	Intermediate Bulk Container
SDS	Safety Data Sheet
NATA	National Association of Testing Authorities Australia
PIRMP	Pollution Incident Response Management Plan
PPE	Personal Protective Equipment
WH&S	Work, Health & Safety

1. Introduction

KMH Environmental (KMH) was engaged by Tank Management Services Pty Ltd (TMS) to develop a Pollution Incident Response Management Plan (PIRMP) in response to a notice from the EPA regarding a review of licences for the drum reconditioners sector.

This PIRMP has been produced for TMS to meet the requirements of Part 5.7A of the *Protection of the Environment Operations Act 1997* and the *Protection of the Environment (General) Regulation 2009.* This Plan has been prepared in accordance with the EPA's *Environmental Guidelines: Preparation of Pollution Incident Response Management Plans (*EPA March 2012).

1.1. Background

TMS is a specialised Intermediate Bulk Container (IBC) services and supply company.

The industries actively serviced by TMS are:

- Agriculture / Agrichemicals;
- Automotive;
- Aviation;
- Building and Construction;
- Chemical Industry;
- Civil Works;
- Food Industry;
- General Public;
- Government;
- Maritime;
- Mining Sector;
- Oil and Gas;
- Transport; and
- water storage and transfer.

TMS obtains used IBCs from a range of clients, washes out liquid wastes from these IBCs and prepares these containers for re-sale. Used IBCs are stored in the Warehouse, awaiting servicing. IBCs are washed out in the Work Area which includes storage areas for wastewater, caustic soda, water and wastewater treatment equipment.

The facility at 89 Redfern Street, Wetherill Park, NSW 2164 is owner occupied.

In addition, Tank Management Services holds the accreditation and licences detailed in Table 1 below.

Table 1 Tank Management Services' Licences & Accreditation

Type of Licence	Description
EPA Premises Licence	Licence No.: 11877 The licence authorises TMS to carry out scheduled activities at the premises: • non-thermal treatment of hazardous and other waste (0 – All); and • container reconditioning (0-All).
EPA Waste Transporters Licence	Licence No.: 10233 The licence authorises TMS to transport hazardous and other waste: • transport of category 1 trackable waste (0 – All Vehicles); and • transport of category 2 trackable waste (0 – All Vehicles).
EPA Bulk Vehicle Licence	Licence No.: 11103 This authorises the TMS vehicle to carry classes of bulk dangerous goods.
Carriage of dangerous goods licences	TMS in-house freight drivers are dangerous goods licenced for the carriage of dangerous good classes 2,3,4,5,6,8,9.
Trade Waste Agreement	Sydney Water Trade Waste Agreement no. 25627

1.2. Objectives

The objectives of this Plan are to:

- ensure comprehensive and timely communication about an incident to staff, the EPA and other relevant authorities such as Fairfield City Council, the NSW Ministry of Health, WorkCover NSW, Fire and Rescue NSW and the community, who may be affected by the impacts of a pollution incident;
- minimise and control the risk of a pollution incident on-site by identifying the risks and having plans and processes in place to minimise and control these risks; and
- ensure the PIRMP is properly implemented by trained staff and is regularly tested for accuracy, currency and suitability.

1.3. Scope of this Document

This Plan applies to the TMS premises at 89, Redfern Street, Wetherill Park, and all licensed activities on the premises. It does not include any activities that occur off the premises, for example, transportation of bulk hazardous waste by a licenced contractor, unless the transportation activity is being undertaken on the premises to which this Plan relates.

1.4. Relationship with other Plans

This plan should be read in conjunction with the Emergency and Evacuation Procedures already in place at TMS.

1.5. Availability of the Plan

A copy of this PIRMP will be kept on-site at all times and will be made available to all site personnel. Information from this PIRMP will communicated to staff through training as described in Section 3.5. Information on pollution incidents will be communicated to the community and the authorities through the Tank Management Services website at: www.tankmanagement.com.au, and using the notification protocols described in Section 4.

This Plan, with the exclusion of personal contact details included in this Plan, will be made publicly available on the TMS website.

2. Hazard and Pollutant Identification

2.1. Types of Pollution Incidents

The definition of 'pollution incident' under the *Protection of the Environment Operations Act 1997* (POEO Act) is:

> *"means 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 set 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."*

Types of Pollution or Spill incidents that may occur at the TMS site which are covered by the Plan include:

- pollution incidents;
- chemical, fuel or oil spills on land or water;
- contamination of waterways; and
- hazardous substances and dangerous good incidents.

Authorities and the community should be notified of a pollution incident if there is a risk of 'material harm to the environment', which is defined in Section 147 of the POEO Act as:

a) harm to the environment if:
   i. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
   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), and

b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

2.2. Inventory of Potential Pollutants

An inventory of potential pollutants on the premises is currently and will continue to be documented in the Hazardous Substances Register. This Register will be updated as and when the maximum quantity of pollutant stored or held on the premises is changed to a higher value or a new maximum quantity. The current Hazardous Substances Register is included in Appendix A.

Storage locations of these pollutants on the TMS premises are detailed on the map provided in Section 3.1 of this Plan.

2.2.1. Safety Data Sheets

A copy of the Safety Data Sheet (SDS) for all substances used on site will be held in the TMS site office.

2.3. Description and Likelihood of Hazards

The following hazards have been identified for the TMS premises as detailed in Table 2 below. Risks have been assessed according to the risk matrix provided in the DECC 2007 *Storing and Handling Liquids, Environmental Protection Participant's Manual* as shown in Table 3.

Table 2 Risk assessment for the TMS premises

Activity	Possible Outcome	How likely is that?	Hazard	Assess the Risk	Action / Control Measure	Responsibility
Storage of hazardous substances	Escape of substance from the premises that may result in pollution. Leak or spill of a substance, a result of which pollution may occur.	**Possible** If routine inspection regime and bunding structure is not maintained.	Substance will leave the site, not possible to contain it, if not noticed in time.	**High Risk**	a) Bunding should be maintained in high quality working order. b) A routine inspection regime will be put in place to prevent such an incident. c) Emergency spill kits and safety equipment will be maintained on-site, and will be replenished directly after a pollution incident.	• Managing Director • Office Manager
Storage of 'slops' waste material	Escape of substance from the premises that may result in pollution. Leak or spill of a substance, a result of which pollution may occur.	**Possible** If routine inspection regime and bunding structure is not maintained.	Substance will leave the site, not possible to contain it, if not noticed in time.	**High Risk**	a) Bunding should be maintained in high quality working order. b) A routine inspection regime will be put in place to prevent such an incident. c) Emergency spill kits and safety equipment will be maintained on-site, and will be replenished directly after a pollution incident.	• Managing Director • Office Manager
Storage of contaminated wastewater	Escape of substance from the premises that may result in	**Possible** If routine inspection regime and bunding	Substance will leave the site, not possible to contain it, if not	**High Risk**	a) Bunding should be maintained in high quality working order.	• Managing Director • Office Manager

Activity	Possible Outcome	How likely is that?	Hazard	Assess the Risk	Action / Control Measure	Responsibility
	pollution. Leak or spill of a substance, a result of which pollution may occur.	structure is not maintained.	noticed in time.		b) A routine inspection regime will be put in place to prevent such an incident. c) Emergency spill kits and safety equipment will be maintained on-site, and will be replenished directly after a pollution incident.	
Failure of IBCs, wastewater tank or heat tank	Escape of substance from the premises that may result in pollution. Leak or spill of a substance, a result of which pollution may occur.	**Possible** If routine inspection regime and bunding structure is not maintained.	Substance will leave the site, not possible to contain it, if not noticed in time.	**High Risk**	a) Bunding should be maintained in high quality working order. b) A routine inspection regime will be put in place to prevent such an incident. c) Emergency spill kits and safety equipment will be maintained on-site, and will be replenished directly after a pollution incident.	• Managing Director • Office Manager
Uncontrolled release of gas	Escape of substance from the premises that may result in air pollution, fire or an explosion.	**Possible** If routine inspection regime of gas cylinders is not maintained.	Substance will leave the site, not possible to contain it, if not noticed in time.	**High Risk**	a) A routine inspection regime will be put in place to prevent such an incident. b) Fire-fighting equipment and safety equipment will be maintained on-site, and will be replenished directly after a fire or explosion.	• Managing Director • Office Manager

Table 3 Risk matrix from DECC 2007 Storing and Handling Liquids, Environmental Participant's Manual

Hazard	Likelihood		
	Very likely	Possible	Unlikely
Substance will leave the site, not possible to contain it (e.g. via stormwater drain, through the soil)	*High Risk*	*High Risk*	*Medium Risk*
Substance may be contained if noticed in time	*High Risk*	*Medium Risk*	*Low Risk*
Substance can be prevented from leaving the site	*Medium Risk*	*Low Risk*	*Low Risk*

3. Pollution Incident Prevention

Preventing pollution incidents requires careful planning and preparation. Based on the risks identified in Section 2.3 above, TMS will undertake staff training, maintain environmental pollution control equipment on-site and implement a number of pre-emptive actions to prevent, but also, prepare for any potential pollution incidents. In particular, TMS has developed a set of maps which identifies locations of environmental pollution control equipment, for the awareness of staff and visitors.

3.1. Maps

Maps of the TMS premises are presented in the figures below. Figure 1 shows the Ground floor plans of the premises and Figure 2 shows the First floor plans of the premises. The maps also show:

- the location of the premises in relation to the surrounding area;
- details on any surrounding areas that are likely to be affected by a pollution incident;
- the location of potential pollutants (e.g. dangerous goods) on the premises; and
- the location of stormwater drains.

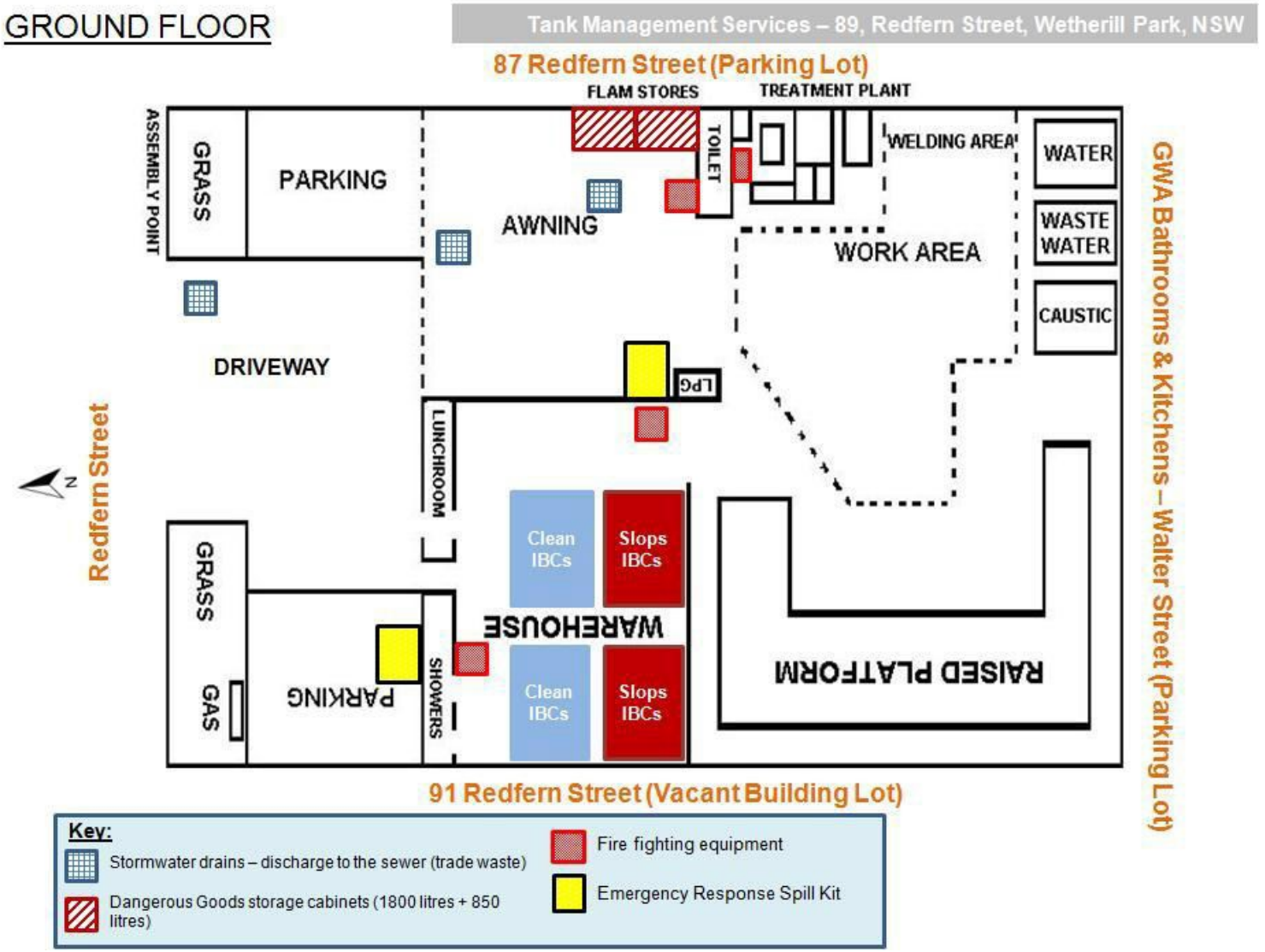

Figure 1 **Ground floor map of the TMS premises**

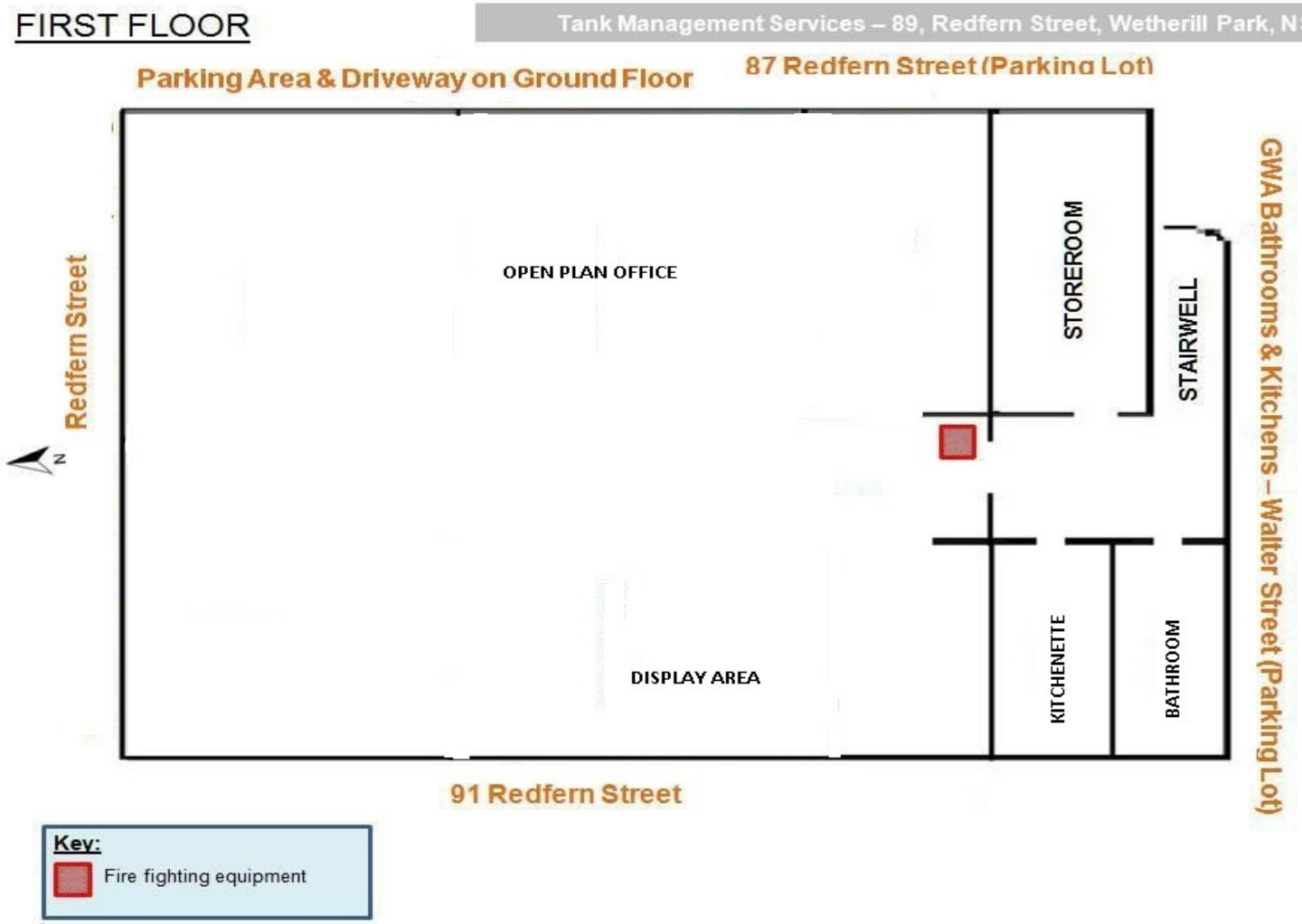

Figure 2 **First floor map of TMS premises**

3.2. Staff Training

All staff will receive basic training regarding the prevention, response to and recovery from a pollution incident which will form a key part of the overall Site Induction.

Specific training will be given for personnel responsible for implementing this Plan. Training will be given in the form of toolbox talks and emergency drills.

Training will include:

- an understanding of the contents of this Plan;
- required responses to manage pollution incidents;
- identification of hazards and reporting of potential risks;
- emergency and evacuation procedures;
- use of Personal Protective Equipment (PPE); and
- the Pollution Incident Response Procedure.

Staff will be provided with information to reflect the following hierarchy in response to an environmental incident:

- ensure health and safety first;
- shut off the source if possible;
- contain the contaminants;
- report to the appropriate people; and
- clean up the incident.

A training register will be maintained by TMS to keep a record of all staff that have received training, including staff names and the date the training was undertaken.

3.3. Pre-emptive Actions to be Taken

TMS will maintain environmental pollution control equipment on-site and ensure that harm to persons on the premises is minimised by implementing the actions detailed below. To directly respond to particular types of pollution incidents, TMS will refer to the Emergency and Evacuation Procedures currently in place.

3.3.1. Environmental Pollution Control Equipment

The following environmental pollution control equipment, which can be used to minimise the risks to human health and the environment, is available:

- bunding around the perimeter of the building;
- standard spill kits;
- sawdust to absorb spills;
- fire-fighting equipment; and
- PPE e.g. gloves, safety glasses.

All fuels, chemicals and dangerous goods will be stored within the building, which is fully bunded. The bunding area has been assessed as having sufficient volume to store 25% of the total volume of chemicals and fuels stored on-site. These liquids will be stored either inside the building premises or under the area covered by the awning to prevent the collection of rainwater. All dangerous goods will be kept secured via lockable dangerous goods cabinets (of 1800 litres and 850 litres in capacity).

3.3.2. Minimising harm to persons on the premises

In order to minimise the risk of harm to people at the premises, the following measures will be implemented:

- restricted access to the site (authorised staff access only);
- all staff and visitors are inducted into the risks and hazards across the premises, locations of emergency assembly points and environmental pollution control equipment;
- all staff and visitors accessing the site are required to wear the appropriate PPE including:
    - 100% cotton, long-sleeved overalls in high-visibility colours;
    - steel capped boots; and
    - safety glasses;
- all staff and visitors will be made aware of the PIRMP including notification/response procedures during site induction;
- all staff and visitors will be made aware of all site exists and emergency evacuation and assembly points; and
- neighbours will be notified of any changes to the work carried out at the premises, including work outside normal working hours.

4. Pollution Incident Response Procedure

To directly respond to and manage particular types of pollution incidents, TMS will refer to the Emergency and Evacuation Procedures currently in place. Actions that need to be taken after an incident, other than directly attending to the containment of the incident, are detailed below.

4.1. Notification Protocol – Authorities

The Nominated Officer at TMS will report any pollution incidents immediately (promptly and without delay), where there is a risk of material harm to the environment, once aware of the incident, to the relevant authorities. Material harm to the environment has been defined above in Section 2.1.

In the event of any pollution incident occurring on-site, the following protocol will be adopted by the Nominated Officer at TMS:

1. Call 000 if the incident presents an immediate threat to human health or property.
    - Fire & Rescue NSW, NSW Police and the NSW Ambulance Service are the first responders responsible for controlling and containing incidents;
2. If the incident does not require an initial emergency services agency, or once the 000 call has been made, the Nominated Officer is responsible for notifying the relevant authorities in the following order:
    A. the NSW EPA
    B. the Ministry of Health (& Fairfield Hospital)
    C. WorkCover NSW
    D. the local Authority (Fairfield City Council)
    E. Fire & Rescue NSW.
3. The Nominated Officer will be responsible for notifying the community, in such instances where the community is affected.

4.1.1. Information requiring notification

The following information about a pollution incident must be presented to the relevant authorities upon notification of the pollution incident:

- the time, date, nature, duration and location of the incident;
- the location of the place where pollution is occurring or likely to occur;
- the circumstances in which the incident occurred, including the cause of the incident, if known; and
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

4.1.2. Contact details for the relevant authorities and TMS staff

Table 4 Emergency Services Contact Details

Service	Address	Telephone Number
Ambulance	Fairfield Hospital Ambulatory Care (Hours of operation: 9am- 5pm, Monday to Friday) Level 2, Cnr Polding Street & Prairievale Road, Prairiewood, NSW 2176	Emergency: 000 Fairfield Hospital Ambulatory Care: (02) 9616 8999
Fire & Rescue NSW	Smithfield Fire Station 875 The Horsley Drive, Smithfield, NSW 2164	000
Police	Wetherill Park Police Station 332, Prairie Vale Road, Prairiewood, NSW 2164	Emergency: 000 Local Police Station: (02) 8788 5199
Fairfield Hospital	Cnr Polding Street & Prairievale Road, Prairiewood, NSW 2176	(02) 9616 8111
Fairfield City Council	86 Avoca Road, Wakeley, NSW 2176	(02) 9725 0222
Ministry of Health	73 Miller Street, North Sydney, NSW 2060	(02) 9391 9000
Medical Centre	Wetherill Park Occupational Health Practice, 447 Victoria Road, Wetherill Park, NSW 2164	(02) 9756 1344
Poisons Information Centre	-	13 11 26
Environmental Emergency – Environment Protection Authority (EPA)	-	131 555
Safety Authority – WorkCover NSW	-	13 10 50
Water Emergency – Sydney Water	-	13 20 90

The contacts in Table 5 are in order of required notification; however, if the incident is an emergency, the emergency services must be notified first.

Table 5 24-hour contact details for key TMS Nominated Officers

Position	Name
Managing Director (Nominated Officer)	**Anthony Alpen**
Nominated Officer (in the case Managing Director is unavailable)	**Peta Mascall**

4.2. Notification Protocol – Community

In the case where the Nominated Officer is required to notify the surrounding community of a pollution incident, TMS will adopt the following protocol:

1. The Nominated Officer will sound the air horn maintained on-site for early warnings of emergency situations;
2. The Nominated Officer will prepare information that needs to be communicated to contact persons in neighbouring buildings;
    - this information will be similar to the information prepared for authorities as described in Section 4.1.1;
3. The Nominated Officer will provide this incident information to the Sales Administrator to upload on the TMS Website;
4. The Nominated Officer will be responsible for placing phone calls or SMS notifications to all contact persons in neighbouring buildings listed below in Table 6;
5. Once the incident has been contained or has been managed in a safe manner, the TMS Nominated Officer will ensure the update of the TMS website and the notification of all neighbouring buildings as previously done in Step 3-4.

The TMS premises are not in close proximity to sensitive premises such as pre-schools, nursing homes and hospitals. However, TMS has recorded the contact details of contact persons in all buildings in the immediate vicinity of 89, Redfern Street, Wetherill Park, NSW 2164, so that persons in the surrounding area can be notified as soon as possible in the case of a pollution incident.

Table 6 Contact details of neighbouring buildings

Building Name
Golden Grain Flour Mill Pty Ltd 1/87 Redfern Street, Wetherill Park
Great Mark Pty Limited 2/87 Redfern Street, Wetherill Park
Atkins Removals & Storage 3/87 Redfern Street, Wetherill Park,
LNS Mechanics 4/87 Redfern Street, Wetherill Park
(currently vacant) 84, Redfern Street, Wetherill Park
ABMS Truck Repairs 82, Redfern Street, Wetherill Park
Supreme Paints 86, Redfern Street, Wetherill Park
GWA Bathrooms & Kitchens Walter Street, Wetherill Park
(currently vacant) 1/91 Redfern St, Wetherill Park
Wilco Home Solutions 2/91 Redfern St, Wetherill Park
West Trans 3/91 Redfern St, Wetherill Park
Oz Grip Tyres & Wheels 4/91 Redfern St, Wetherill Park

The process in determining whether or not neighbours are to be notified depends on the type of pollutant, the volume of the pollutant and the potential impact on the surrounding area. In the case of potential air pollution, TMS will consider:

- prevailing winds;
- height and magnitude of emissions;
- location of the incident and any off-site impacts;
- the likelihood of the pollutant reaching ground level; and
- impacts on neighbouring communities.

4.3. Investigate the Cause of the Pollution Incident

The following actions should be taken to investigate the cause of a pollution incident:

- after the clean-up of the incident, determine the reasons for the incident;
- investigate the types of measures to be put in place to reduce the risk of the pollution incident occurring again; and
- following the investigation, should any new procedures be identified, these should be prepared and included in this Plan.

4.4. Test the PIRMP

Within 1 month following the pollution incident, the PIRMP must be tested in such a manner so as to ensure that the information included is accurate and up-to-date and that the Plan is capable of being implemented in a workable and effective manner. The Plan should be tested according to the method detailed in Section 5 of this Plan.

4.5. Staff Training

Following the clean-up and investigation of the pollution incident, all staff will receive training in the form of toolbox talks or formal incident training. Any new procedures or changes to the PIRMP will be communicated to all staff immediately and training will be undertaken as soon as possible following the pollution incident.

5. Testing of this Plan

The PIRMP will be tested by TMS in accordance with the requirements set out in the *Protection of the Environment Operations Regulation 2009* as follows:

- to ensure that the information included in the Plan is accurate and up to date and the Plan is capable of being implemented in a workable and effective manner; and
- any such test is to be carried out:
    - at least once every 12 months; and
    - within 1 month of any pollution incident occurring on-site.

The Plan will be tested by undertaking desktop simulations and practical exercises. Practical exercises in environmental incident responses will include, but will not be limited to:

- spills;
- release of hazardous materials on-site (including airborne releases);
- fires;
- explosions;
- locations and types of emergency response equipment;
- SDS and chemical use;
- evacuation routes and exits;
- arrangements with local emergency support;
- assembly points; and
- reporting requirements and organisational responsibilities.

Amendments to the Plan will be recorded in the PIRMP Testing & Review Register in Appendix B. In the Register, the following details will be recorded:

1) review date and name of person that carried out the review; and
2) the date on which the Plan is updated and name of person that was responsible.

6. Implementation of this Plan

If a pollution incident occurs in the course of an activity at the TMS premises so that material harm to the environment is caused or threatened, the person carrying out the activity will immediately implement the procedures contained within this PIRMP that has been developed to the meet the requirements of the *Protection of the Environment Operations Act 1997.*

Appendix A

Hazardous Substances Register

Hazardous Substances Register

TANK MANAGEMENT SERVICES PTY LTD - LIST OF SUBSTANCES *(to be kept with MSDSs to form a register)*								Page:	1	of	2
WORKPLACE: 89 Redfern St WETHERILL PARK								Date:	27 October 16		
Name of Substance	Size	Qty Stored	Location of Substance	Current MSDS	Hazardous Substance	Dangerous Goods	Labelled	Used For	Comments		
				Yes/No	Yes/No	Yes/No	Yes/N				
Acetylene	4.1m/3 cyl.	1 cylinder	Welding Bay	Yes	No	Yes	Yes	Mig Welder			
Active Gel	20kg bag	250Kg	Effluent Plant	Yes	Yes	No	Yes	Waste water treatment	Also called Pixie Dust		
Antifoam 203	20lt drum	20L	Effluent Plant	Yes	Yes	No	Yes	Waste water treatment			
Antifoam 212	20lt drum	20L	Effluent Plant	Yes	Yes	No	Yes	Waste water treatment			
Caustic Soda Liquid 25%-50%	1000L	1000L IBC	Effluent Plant	Yes	Yes	Yes	Yes	Internal Wash of tanks			
Caustic Soda Pearl	25kg bag	250Kg	Effluent Plant	Yes	Yes	Yes	Yes	Cleaning of IBCs			
Clearflox	1000L	1000L IBC	Effluent Plant	Yes	No	No	Yes	Waste water treatment			
Cold Galv – 400g can	400G	48 cans	Flamestores	Yes	Yes	Yes	Yes	Finishing/painting of bulkiboxes			
Cyndan Specialised Acid Wash	25lt drum	25L	Effluent Plant	Yes	Yes	Yes	Yes	External Wash for stainless steel IBC's			
De-Rust Oil	20lt drum	20L	Back corner shelf	Yes	Yes	No	Yes	Lubrication – plant			
Shell Diesel – 25lt jerry cans	25lt jerry can	75L	Flamestores	Yes	Yes	No	Yes	Break down polymers in cleaning of IBC's & power gerni			
Gun wash	1000L	1000L IBC	Flamestores	Yes	Yes	Yes	Yes	Cleaning of tanks			
Hydrochloric Acid Solution	1000L	1000L IBC	Effluent Plant	Yes	Yes	Yes	Yes	PH Balancing			

LP Gas Industrial	15kg Cylinder	3 in use	Forklifts	Yes	No	Yes	Yes	Forklifts	
LP Gas Industrial	15kg Cylinder	4 spare	Forklifts	Yes	No	Yes	Yes	Forklifts	
MEK	20lt drum	100L	Flamstores	Yes	Yes	Yes	Yes	SS tank paint removal	
Oxygen			Welding Bay	Yes	No	Yes	Yes	Oxy cutter	
Polyflox 135D		20L	Effluent Plant	Yes	No	No	Yes	Waste water treatment	
Shell Tellus Oil 100	20lt drum	20L	Back corner shelf	Yes	No	No	Yes	Lubrication – air rams on wash bay	
Silver Galv – 400g can	400g can	60 cans	Flamestores	Sending	Yes	Yes	Yes	Finishing/painting of IBCs	
Supashield 07	10.5m/3 cyl.	1 cylinder	Welding Bay	Yes	No	Yes	Yes	Welding	
T102 Enamel Thinner	4L		Flamestores	Yes	Yes	Yes	Yes	Oxy Cutter	

Appendix B

PIRMP Testing & Review Register

PIRMP Testing & Review Register

Review no.	Date	Reason for Test/ Review	Name of Person responsible	Signature