



POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN
LICENCE# 21691

1. POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 21691

Approved by: Nigel Smallmon

Signature:

Position/Title: Company Director

Date: 08/05/2024

Introduction:

This Pollution Incident Response Management Plan (PIRMP) covers the key actions to minimise the occurrence of a pollution incident and manage a pollution incident if one occurs (during and after a pollution incident).

This document has been prepared for managing the impact to human health (employees and nearby neighbours) and the environment (onsite and offsite).

Purpose:

Smallmon Brothers Waste and Recycling holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for 25 Bomen Road, Bomen. 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 out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised 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 section 74 of the *Protection of the Environment Operations (General) Regulation 2022*.

Section 74(3) of the *Protection of the Environment Operations (General) Regulation 2022* requires redaction of personal details of the employees of Smallmon Brothers Waste and Recycling when published on the websites.

Note: This plan must be developed in accordance with the *Protection of the Environment Operations Act 1997* and the *Protection of the Environment Operations (General) Regulation 2022*.

2. ENVIRONMENT PROTECTION LICENCE (EPL) DETAILS

Name of licensee:	Smallmon Brothers Waste (ABN 91 160 179 715)
EPL number:	21691
Premises name and address:	Smallmon Brothers Waste 25 Bomen Road, Bomen NSW 2650
Company or business contact details	Name: Nigel Smallmon Position or title: Director. Business hours contact number/s: [REDACTED] After hours contact number/s: [REDACTED] Email: [REDACTED]
Website address:	www.smallmons.com.au
Scheduled activity/activities on EPL:	Waste Storage – hazardous, restricted solid, liquid, clinical and related waste, and asbestos waste
Fee-based activity/activities on EPL:	N/A

3. DEFINITION OF A POLLUTION INCIDENT

The POEO Act 1997 defines a pollution incident as:

"pollution incident 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 noise".

Smallmon Brothers Waste and Recycling is required to notify the relevant regulatory authorities 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:

Harm to the environment is material if:

- It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or 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
- 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.

Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and without limiting the generality of the above, includes any act or omission that results in pollution.

4. PIRMP COMPLIANCE MATRIX

The purpose of this section is to outline the legislative requirements for a PIRMP under the *Protection of the Environment Operations Act 1997 (NSW)* and *Protection of the Environment (General) Regulations 2022 (NSW)*.

The PIRMP Compliance Matrix listed in Table 1 and 2 identifies the section and regulation of the relevant legislation and is listed below.

Section	Requirements under the Protection of the Environment Operations Act 1997 (NSW)	Section in PIRMP
153A	<p>Duty of licence holder to prepare pollution incident response management plan.</p> <p>The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.</p>	Section 1
153 C	<p>Information to be included in plan.</p> <p>A pollution incident response management plan must be in the form required by the regulations and must include the following:</p> <ul style="list-style-type: none"> a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to: <ul style="list-style-type: none"> i. the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and ii. the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and iii. (iii) any persons or authorities required to be notified by Part 5.7, b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution, c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made, d) any other matter required by the regulations. 	Section 1
153 D	<p>Keeping of plan.</p> <p>A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.</p>	Section 1

153 E	Testing of plan. A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.	Section 18
153 F	Implementation of plan. If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.	Section 7

Table 1-Compliance Matrix - Requirements under the Protection of the Environment Operations Act 1997 (NSW)

Regulation	Requirements under the Protection of the Environment Operations (General) Regulations 2022 (NSW)	Section in PIRMP
70	Definition In this Chapter— PIRM plan means a pollution incident response management plan required to be prepared under the Act, Part 5.7A.	Section 1
71	Form of the Plan. A PIRM plan— <ul style="list-style-type: none"> a) must be in written form, and b) may form part of another document required to be prepared under or in accordance with another law if the information required to be included in the PIRM plan is readily identifiable as that information in that other document 	Section 1
72(a)	Hazards: A description of the hazards to human health or the environment associated with the activity to which the licence relates	Section 11 Appendix A
72 (b)	Likelihood: The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.	Section 11 Appendix A
72 (c)	Pre-Emptive Action: 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.	Appendix A
72 (d)	Pollutant Inventory Types: An inventory of potential pollutants on the premises or used in carrying out the relevant activity.	Section 12
72 (e)	Pollutant Inventory Quantities: 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 12

72 (f)	Safety Equipment: 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 13
72 (g)	Staff Contacts: The names, positions and 24-hour contact details of those key individuals who: <ul style="list-style-type: none"> (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 7
72 (h)	Authority Contact: The contact details of each relevant authority referred to in section 148 of the Act	Section 8
72 (i)	Early Warnings Neighbours: 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 Section 9
72 (j)	Staff Safety: 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 5 Section 15
72 (k)	Maps: 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 affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.	Section 15
72 (l)	Early Warnings General: 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.	Section 5 Section 6 Section 15

72 (m)	Training of Staff: the nature and objectives of any staff training program in relation to the PIRM plan.	Section 17
72 (n)	Timing of Testing: The dates on which the PIRM plan has been tested and the name of the person who carried out the test.	Section 18
72 (o)	Updating of Plan: The dates on which the PIRM plan is updated.	Section 18
72 (p)	Plan Testing: The manner in which the PIRM plan is to be tested and maintained	Section 18
74 (1)	Availability of plan: 1) A PIRM plan is to be made readily available: a) to an authorised officer on request, and b) to a person who is responsible for implementing the PIRM plan at the premise- i) to which the relevant licence relates, or ii) where the activity takes place	Section 1
74 (2)	Publishing Plan Parts: 2) A PIRM plan is also to be made publicly available in the following manner within 14 days after it is prepared: a) in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan, b) if the person does not have such a website--by providing a copy of the PIRM plan, without charge, to any person who makes a written request for a copy.	Section 1
74(3)	Procedures under Act: 3) Subclause (2) applies only in relation to that part of a PIRM plan that includes the information required under: a) section 153C(a) of the Act, and b) this Regulation, section 72(h) and (i) or 73(b)(ii) and (iii).	Section 1

74 (4)	Privacy Protection: 4) Personal information, within the meaning of the Privacy and Personal Information Protection Act 1998, is not required to be included in a PIRM plan made available to a person other than an authorised officer.	Section 1
75 (1)	Testing of the Plan – 1) A PIRM plan must be tested— a) routinely at least once every 12 months, and b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring.	Section 18
75 (2)	Testing Outcomes: 2) The test must be carried out in a way to ensure the following— a) the information included in the PIRM plan is accurate and up to date, b) the PIRM plan is capable of being implemented in a workable and effective way.	Section 18
75 (3)	Matters Assessed: 3) A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident.	Section 18

Table 2-PIRMP Compliance Matrix- Requirements under the Protection of the Environment Operations (General) Regulations 2022 (NSW)

5. ACTIONS DURING A POLLUTION INCIDENT

In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site Evacuation Procedure.

All staff are informed on the location of muster locations through site inductions, signage, and ongoing training.

Smallmon Brothers Waste and Recycling are required to report pollution incidents 'immediately' (without delay) to the ARA's listed in Section 8.

In the event of a pollution incident, the person which has identified the incident should immediately contact the following persons:

- Executive Manager -Jasmine Kefford ([REDACTED])
- Safety & Compliance Manager-Anthony O'Bryan ([REDACTED])

The person reporting the pollution incident should provide the following key details:

- Name and contact details;
- Location of the pollution incident/emergency;
- nature of the pollution incident/emergency; and
- details of any assistance required.

Some general controls for managing a pollution incident include:

- visually assess the situation.
- undertake emergency response if required;
- contact the appropriate regulatory authorities in accordance with the PIRMP (Refer Section 8);
- contact nearby businesses (Refer Section 9);
- undertake immediate measures (if safe and possible to do so) to prevent further impacts from the pollution incident;
- take direction from the appropriate regulatory authorities as required; and
- seek assistance (if required) from specialist consultants/contractors.

In the event of a pollution incident Smallmon Brothers Waste and Recycling will use the following procedure to ensure that parties listed are notified:

- On site: sound Evacuation Siren to activate Emergency Evacuation Procedure.
- Face to face contact with neighbours where possible; and/or
- Telephone to advise nearby businesses of the incident (Refer to Section 8).
- Immediate neighbours: phone neighbouring businesses and doorknock neighbouring residents to inform of the risk and actions they should take e.g. shut windows and doors, stay inside.
- Inform passing pedestrians and motorists if safe to do so.
- Contact hospitals, nursing homes, schools and childcare centres if needed.
- Detail to relevant stakeholders what preventative actions are required to prevent or minimise harm. These may include:
 - closing doors and windows;
 - evacuate buildings or premises;
 - not to drink or swim in water courses, etc.

6. ACTIONS FOLLOWING A POLLUTION INCIDENT

Once the pollution incident is remediated and operations are resumed, a review of the incident and the response to it will be conducted.

- Conduct an internal investigation and record findings.
- Include on agenda for next safety meeting.
- Assist external investigation by EPA, Wagga Wagga City Council, or any other investigators.
- Upon conclusion of review, communicate findings to people impacted by the incident:
 - On site – through meetings
 - Offsite – by letter
- Test the effectiveness of this Pollution Incident Response Management Plan:
 - at the first Emergency Evacuation Drill of each year
 - checked annually as part of the annual audit process;
 - one month after any incident to ensure controls are in place.
- Review the need of further training of staff.
- Implement identified actions.

7. POLLUTION INCIDENT – PERSON/S RESPONSIBLE

PIRMP activation

Person Responsible: Christopher Smallmon

Position: Company Director

Business hours contact number/s: [REDACTED]

After hours contact number/s: [REDACTED]

Email: [REDACTED]

Notifying relevant authorities

Person Responsible: Jasmine Kefford

Position: Executive Manager

Business hours contact number/s: [REDACTED]

After hours contact number/s: [REDACTED]

Email: [REDACTED]

Managing response to pollution incident

Person responsible: Anthony O'Bryan

Position: Safety & Compliance Manager

Business hours contact number/s: [REDACTED]

After hours contact number/s: [REDACTED]

Email: [REDACTED]

8. NOTIFICATION OF RELEVANT AUTHORITIES

Priority	Contact	Details
Mandatory Notification (Immediate)	Fire and Rescue NSW / Rural Fire Service	
	Local Police	
	Wagga Wagga Base Hospital	
	SafeWork NSW	
	Wagga Wagga City Council	
	EPA	
Non-Mandatory Notification (As Required)	Water NSW	
	Department of Planning, Housing, and Infrastructure	
	Transport NSW	

In the event of an incident defined as “notifiable” under Part 5.7 of the *Protection of the Environment Operations Act 1997 (NSW)*, a pollution incident that causes or threatens to cause ‘material harm’ to human health or the environment.

This **MUST BE** reported to the Appropriate Regulatory Authority (ARA).

The ARA may include:

- The appropriate regulatory authority (ARA) for the activity under the POEO Act (usually the EPA or local council)
- The EPA if they are not the ARA.
- The Ministry of Health (via Public Health Units).
- SafeWork NSW.
- The local authority if it is not the ARA.
- Fire and Rescue NSW.

A notifiable event is listed as the following:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or
- 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
- 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.

This report **MUST** apply even when the incident is contained and on site.

The relevant ARA must be contacted, and the following information will need to be supplied: your contact information.

- your business name and address.
- the time, date, and location of the notifiable incident.
- type of incident it was, such as a spill, leak, escape or fire.
- what caused the incident, or you suspect caused it.
- estimate of volumes released.
- what you think the impact may be on human health and the environment.
- how you're managing the incident.

Failure to report may result in the following fines:

- for a corporation—**\$4,000,000** and, for a continuing offence, a further penalty of **\$480,000** for each day the offence continues, or
- for an individual—**\$1,000,000** and, for a continuing offence, a further penalty of **\$240,000** for each day the offence continues.

9. NOTIFICATION TO NEARBY LOCATIONS

As soon as reasonably practicable	Bomen Takeaway and Diner	
	Truck Art	
	Southwest Trailers	
	Prefabulous	
	Ladex Construction Group	
	Darling Irrigation	
	Steel Supplies Bomen	
	Kraft Heinz	

NOTE-There are no sensitive premises next to or surrounding Smallmon Brothers Waste and Recycling.

10. DESCRIPTION AND LIKELIHOOD OF HAZARDS

Please refer to Appendix A -Risk Register for the description of the hazards relating to human health and/or or the environment.

11. DESCRIPTION AND LIKELIHOOD OF HAZARDS AND PRE-EMPTIVE ACTIONS

An extract of the site Smallmon Brothers Waste and Recycling Risk Register (for 25 Bomen Road, Bomen NSW) is presented in Appendix A.

The Key to the Register is presented below:

Section of Risk Register	Description
Hazard	A description of the hazards to human health or the environment associated with the activity to which the licence relates
Likelihood	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.
Consequence	The most probable result of the potential incident.
Risk Rating	The assessment of risk and classification considering likelihood and consequence.
Inherent Risk	The assessed level of raw or untreated risk without controls.
Residual Risk	The amount of risk left after treatment and added controls.

12. INVENTORY OF POLLUTANTS

Location/tank	Max. quantity	Contents	Comments
Rear of Workshop	14,000 litres	Used Cooking Oil	N/A
Rear of Workshop	14,000 litres	Used Cooking Oil	N/A
Bunded Workshop	6 x 20 litres jerry cans	Fuel	N/A
Bunded Workshop	2 x 20 litres containers	Motor Oil	
Yard/Mobile	10,000 litres	J120	Mobile Container Temp Storage only
Yard/Mobile	10,000litres	Grease Trap	Mobile Container Temp Storage only

13. SAFETY EQUIPMENT AND PROCEDURES

Equipment	Comments
SDS Register x 2	Located in the workshop and the office. Emergency Management and Hazardous Chemical Audit Program (Annually) to ensure SDS are maintained.
Spill Kits	Located in the store, workshop, and e-Recyclers. Emergency Management and Hazardous Chemical Audit Program (Annually) Yard Inspection (Monthly)
Fire equipment	Marked on map. Fire Certificate updated annually. Equipment checked twice yearly. Emergency Management Audit Program (Annually) Yard Inspection (Monthly)
Emergency Evacuation Drills	Conducted quarterly.
Personal Protection Equipment	Gloves, boots, glasses, dusk masks, hearing protection and hi-vis clothing. Issued to every person on site. Emergency Management and Hazardous Chemical Audit Program (Annually) Yard Inspection (Monthly)
Bunds	Fuel and oil areas are bunded. Locations marked on map. Emergency Management and Hazardous Chemical Audit Program (Annually) Yard Inspection (Monthly)
Maintenance Inspections	Conducted daily by maintenance workers. Emergency Management and Hazardous Chemical Audit Program (Annually) Yard Inspection (Monthly)

14. COMMUNICATING WITH NEIGHBOURS AND THE LOCAL COMMUNITY

If it is determined that staff members and members of the public will be impacted by the pollution incident, the following protocols will occur:

- On site: sound Evacuation Siren to activate Emergency Evacuation Procedure.
 - Immediate neighbours: phone neighbouring businesses and doorknock neighbouring residents to inform of the risk and actions they should take e.g. shut windows and doors, stay inside.
 - Inform passing pedestrians and motorists if safe to do so.
 - Contact hospitals, nursing homes, schools and childcare centres if needed.
-

15. MAP



Map 1- 25 Bomen Rd and surrounding area.



Map 2- 25 Bomen Rd, Bomen

16. COORDINATING WITH PERSONS

If it is determined that staff members and members of the public will be impacted by the pollution incident, the following protocols will occur:

- On site: sound Evacuation Siren to activate Emergency Evacuation Procedure.
- Immediate neighbours: phone neighbouring businesses and doorknock neighbouring residents to inform of the risk and actions they should take e.g. shut windows and doors, stay inside.
- Inform passing pedestrians and motorists if reasonably possible.
- Contact hospitals, nursing homes, schools and childcare centres if needed.

17. STAFF TRAINING

All staff at Smallmon Brothers Waste and Recycling will be inducted to the site before being allowed to commence work. An integral part of this training will be for environmental and emergency management.

Emergency evaluation plans and contacts will be displayed at the site.

The Integrated Compliance and Safety Manager will ensure all employees are advised on the procedures to follow in the event of an emergency or pollution incident. Toolbox meetings will regularly convey updated information required for the management of the site.

In addition to the above, the following procedures are in place:

- Staff will be made aware of this Pollution Incident Response Management Plan (PIRMP).
 - Key personnel will undertake training about this PIRMP annually.
 - Key personnel undertake chemical handling and spill response.
 - All staff undertake safety training annually.
 - Emergency Evacuation Drills are conducted quarterly.
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18. TESTING AND UPDATING OF THE PIRMP

This plan will be tested annually at the first quarterly Emergency Evacuation Drill of each year. The test will include a desktop simulation as well as the practical exercise.

This will ensure that the information contained in the plan is accurate and up to date, and the plan is capable of being implemented in a workable and effective manner.

The plan will also be tested:

- 1 month after any pollution incident occurs;
- If there are significant changes to the hazards and risks on the site;
- If the plan is to be adapted to include other sites.

PIRMP Testing				
Date tested	Tested by	Details of test	Finding of test, including issues identified	Next scheduled testing date
20/04/2023	Jasmine Kefford & Jason Peel	Practical walkthrough	All worked effectively. Added extra spill kit in central location.	28/03/2024
15/04/2024	Jasmine Kefford & Anthony O'Bryan	Practical walkthrough	All worked effectively. Additional controls added including: <ul style="list-style-type: none">• Inspections.• Emergency Management and Hazardous Materials audit program.	1/2/2025

PIRMP Update Details				
Date update occurred	Reason for update	Details of updates	Date the updated version uploaded to website.	Date of completion
21/04/2023	First PIRMP	New document	21/04/2023	21/04/2023
15/04/2024	Personnel Change	Additional staff-Safety & Compliance Manager	N/A	15/04/2024
05/05/2024	Requirement for Annual Plan Update	Plan Revised & Update		08/05/2024

SMALLMON BROTHERS WASTE AND RECYCLING				
25 BOMEN ROAD, BOMEN				
Activity	Hazard Description	Inherent Risk	Controls	Residual Risk
Storage and Handling of wastes classified as Dangerous Goods	Storage of Reaction of Incompatible Dangerous Goods	8	<ul style="list-style-type: none"> Correct storage of Dangerous Goods (adherence to Separation Distances). Personnel appropriately trained in Dangerous Goods Storage and Handling. Emergency Management and Hazardous Chemical Audit Program (Annually). Yard Inspection (Monthly). 	6
Unloading of Waste from Truck/ Loading of waste onto Truck	Spill during loading that leads to contamination of stormwater	8	<ul style="list-style-type: none"> Bunded Area is designed, constructed, operated, and maintained correctly. Spill kits available for staff. Unloading undertaken within the Bunded Area. 	6
	Uncontrolled release of hard litter	9	<ul style="list-style-type: none"> Personnel appropriately trained in Dangerous Goods Storage and Handling. Emergency Management and Hazardous Chemical Audit Program (Annually). 	4
	Uncontrolled release of liquid waste	9	<ul style="list-style-type: none"> Yard Inspection (Monthly). 	4
Generation of dusts through crushing and other work	Respirable dusts and similar being inhaled by workers and other persons	12	<ul style="list-style-type: none"> Dust suppression system (on site). Dust suppression system on hard surface (concrete) to prevent movement. Emergency Management and Hazardous Chemical Audit Program (Annually) Yard Inspection (Monthly) 	6

Table 3-Risk Register-25 Bomen Road, Bomen

Consequence	Likelihood				
	1	2	3	4	5
	Rare	Unlikely	Possible	Likely	Almost certain
5 Catastrophic	5	10	15	20	25
4 Major	4	8	12	16	20
3 Moderate	3	6	9	12	15
2 Minor	2	4	6	8	10
1 Negligible	1	2	3	4	5

Table 4-Risk Scoring Table

Grading Risk	
1-3	Low risk
4-6	Moderate risk
8-12	High risk
15-25	Extreme risk

Table 5-Grading Table