



# SITE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Yates Australia

9 Coventry Place Mt Druitt NSW

**Emergency Response**

**DuluxGroup Emergency Response Service**

**1800 033 111**

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## Document Control

Issue	Date	Revision Changes	Revised by title
2.8	26/06/2023	Update DG Manifest & Site Map	S&S Advisor
2.7	10/01/2022	Update new contacts	S&S Business Lead
2.6	20/04/2021	Update contacts	S&S Business Lead
2.5	05/05/2020	DG Update and S&S Review	S&S Advisor
2.4	01/02/2019	S&S Review	S&S Business Lead
2.3	09/03/2018	S&S Review	S&S Advisor
2.2	24/07/2017	Plan reviewed with site manager	Factory Manager Warehouse Manager
2.1	16/04/2015	Review plan against NSW EPA Environmental Guidelines: Preparation of pollution incident response management plan. Inclusion of pollution 'definition' and 'notification'.	S&S Advisor
2.0	25/07/2014	Plan reviewed with site manager	S&S Business Lead
1.0	24/08/2014	Draft plan developed.	Warehouse Manager

## Current Revision

Date Implemented	Version	Approval Position	Test / Schedule	Next Review
23/06/2023	2.8	S&S Business Lead	12 monthly	June 2024

## Purpose

The purpose of this plan is to outline the site procedure to be followed when responding to a pollution incident to minimise environmental and business impact and to ensure a pollution incident is managed in an effective manner.

This procedure has been developed to outline the actions required by site management in the event of a pollution incident. A pollution response procedure is required as part of the site Environmental Protection License and can be made available to members of the public on the DuluxGroup company website or by written request to the site.

The procedure covers potential pollutant hazards and controls, and the sites incident response process should a pollution incident occur. Due to unpredictability of incidents and emergency situations it must be understood that some circumstances may arise that are not covered by this procedure but those identified in our site Emergency Management Risk Assessment have been included.

This plan does not replace or supersede the site Emergency Management Plan that may also be operational at the same time to manage other types of emergency situations. Upon activation of the pollution response plan the site management team can request the assistance of the business Crisis Management Team.

## Introduction

The DuluxGroup Mt Druitt Site occupies 4.7 hectares at 9 Coventry Place, NSW. The facility comprises of an administration building, manufacturing area, distribution centre and employee car park. The site usually operates over two shifts from 5am – 11pm, Monday to Friday but can operate a night shift and on Saturdays if volume permit.

The Western Rail Line and residential homes border the rear of the site. Other industrial facilities such as manufacturing and warehousing facilities border the front of the sides of the premises. The boundary to the West has a power line easement.

## Definition of a Pollution Incident

A **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 any noise.

## Notification of a Pollution Incident

A pollution incident is required to be notified 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 is material 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.

Yates Mt Druitt is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. '**Immediately**' has its ordinary dictionary meaning of promptly and without delay.

## Scope

This PIRMP must be followed by employees, contractors and visitors to Yates Mt Druitt in order to assist in the early response and reporting of a pollution incident.

## Pollution Response Team Responsibilities

The Pollution Incident Response Team is responsible for the overall conduct and control of any pollution incident until such time as the incident is under control and an initial investigation has been completed. Once the "All clear" is given by emergency services and/or regulatory authorities the Pollution Response Team transfers responsibility for normal operation back to the Operations Manager.

The Team's responsibilities include:

- Activating the initial incident response to ensure effective control of the situation.
- Activating the site emergency evacuation procedures to ensure the health and safety of all workers and to prevent unauthorised access to the incident area.
- Notifying emergency services and appropriate regulatory authorities of the incident
- Notify direct neighbours / members of the community about the incident.
- Respond to issues as they arise during the incident.
- Obtaining and collating information from internal and external sources.
- Ensuring that appropriate personnel are kept informed of the incident.
- Managing internal and external communications.

## Pollution Incident Response Team Roles

<b>Roles</b> Contact ERS (1800 033 111) for connection with any roles listed below	<b>Responsibilities</b>
<b>INCIDENT CONTROLLERS</b> Factory Manager Warehouse Manager	<ul style="list-style-type: none"> <li>• Contact emergency services.</li> <li>• Assess the incident situation and activate the site Emergency Response Team if required.</li> <li>• Prevent further harm by controlling the incident scene, if safe to do so.</li> <li>• Activate the site emergency evacuation procedure, if required.</li> <li>• Manage the site evacuation procedure.</li> <li>• Liaise with emergency services and regulatory authorities.</li> <li>• During emergency evacuation prevent unauthorised access to the site.</li> </ul>
<b>EQUIPMENT TECHNICIAN</b> Maintenance & Reliability Leader	<ul style="list-style-type: none"> <li>• Assess the incident scene and co-ordinate any equipment repairs and maintenance.</li> </ul>
<b>COMMUNITY LIASON</b> Production Manager	<ul style="list-style-type: none"> <li>• Upon request from the Operations Manager or S&amp;S Manager the production manager will notify direct neighbors and members of the community about the incident.</li> <li>• Assess the incident scene and manage the clean-up and control process.</li> </ul>
<b>INCIDENT NOTIFYER</b> S&S Business Lead Safety & Sustainability Advisor	<ul style="list-style-type: none"> <li>• Immediately (e.g. promptly and without delay) notify appropriate regulatory authorities of the pollution incident or make sure that the incident has been notified.</li> <li>• Obtain and collate information from internal and external services</li> </ul>
<b>INTERNAL COMMUNICATIONS MANAGER</b> Operations Manager – Yates	<ul style="list-style-type: none"> <li>• Manage internal communications within DuluxGroup</li> </ul>
To maintain employee confidentiality, the Pollution Response Team contact details are held with the DuluxGroup Emergency Response Service. Contact details are updated every 6 months or upon change of role. To report an incident or contact the team by calling 1800 033 111	

## Pollution Response Key Contacts

Any pollution incident satisfying the material harm threshold must be immediately reported to relevant statutory authorities by either the Operations Manager, S&S Manager or S&S Advisor.

In cases where material harm level cannot be immediately assessed or insufficient information is available on the severity of the incident, the general advice is to notify the Relevant Authorities and discuss that the situation could not be fully assessed.

The incident notification should be limited to facts known and records of the notification must be documented. The following facts should be provided at the time of notification: Location & time, Type of incident (e.g, fire, spill, escape, explosion) and Initial response taken

### Regulatory Contacts

Type	Contact Details	Role Required to Contact
Emergency Services (NSW Fire & Rescue)	000	Operations Manager S&S Business Lead Safety & Sustainability Advisor
Department of Environment & Heritage (NSW EPA)	02 9695 2777, Environment Line: 131 555	
Ministry of Health (Pollution Incident)	02 9391 9000	
Worksafe NSW	13 10 50	
Poisons Information	13 11 26	

### External Services Contacts

Type	Contact Details	Role Required to Contact
Electricity Supplier - AGL	131 003	Factory Manager
Water Supplier	Landlord (Frank Knight Property) 02 9761 1800 (Parramatta Office)	Factory Manager

### Neighbour Contacts

Neighbor contact details can be provided upon request.

Role required to contact: Production Manager

Type	Location
Warehouse & Depot Facility	5 Coventry Place
Depot Facility	6 Coventry Place
Warehouse Facility	7 Coventry Place
Warehouse Facility	8 Coventry Place
Warehouse Facility	10 Coventry Place
Warehouse Facility	112 Kurrajong Avenue
Warehouse Facility	114 Kurrajong Avenue
Factory & Warehouse Facility	118 Kurrajong Avenue
Industrial Estate – Small Units	99 Kurrajong Avenue
Depot Facility	97 Kurrajong Avenue
Industrial Estate – Small Units	101 Kurrajong Avenue
Industrial Estate – Small Units	103 Kurrajong Avenue
Industrial Estate – Small Units	105 Kurrajong Avenue

Type	Location
Warehouse facility	109 Kurrajong Avenue
Factory & Warehouse Facility	111 Kurrajong Avenue
Factory & Warehouse Facility	124 Kurrajong Avenue
Warehouse Facility	126 Kurrajong Avenue

## Potential Pollution Incidents

Incident Type	Possible Case / Hazards	Incident Response	Site Controls	Likelihood
Fire	<ul style="list-style-type: none"> <li>Ignition source in hazardous area</li> <li>Dangerous goods spill</li> <li>Equipment electrical failure</li> </ul>	<ul style="list-style-type: none"> <li>Activate the nearest emergency alarm</li> <li>Contact factory manager to notify emergency services</li> <li>Attack fire if safe to do so</li> <li>Shut down equipment</li> <li>Evacuate to safe assembly area</li> <li>Remain in assembly area until the all clear is given by emergency services and Chief Fire Warden.</li> <li>Clean the area and remove damaged equipment.</li> <li>Hold a debrief session to document site response and determine improvement initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>Extinguishers</li> <li>Hose Reels</li> <li>Sprinkler System</li> <li>Alarm System</li> <li>Fire Team</li> <li>First Attack Training</li> </ul>	MEDIUM
Spill Chemical Liquids Dust Propagation	<ul style="list-style-type: none"> <li>Forklift contact with drum</li> <li>Dropping of drum, pot and other liquid &amp; dust containers</li> <li>Pipework leak</li> <li>Silo damage / leak</li> <li>Racking collapse Raw Material Storage Area</li> <li>Dust collector release</li> <li>Bund pit/overflow</li> </ul>	<ul style="list-style-type: none"> <li>Activate the nearest emergency alarm</li> <li>Contact emergency services if required to assist with spill clean-up.</li> <li>Activate site emergency evacuation procedures if necessary – obtain a copy of the Safety Data Sheet (SDS) for use by emergency services.</li> <li>Review the spill situation and control the source to prevent spreading, entering storm water drains.</li> <li>Barricade spill area to prevent exposure to vapors</li> <li>Ensure spill is contained on site, close drain valves and test first flush water.</li> <li>Use absorbent material to clean the spill</li> <li>Dispose of spill cleanup material appropriately</li> <li>Hold a debrief session to document site response and determine improvement initiatives.</li> <li>Conduct environmental monitoring / review of any spill areas.</li> </ul>	<ul style="list-style-type: none"> <li>Trained and competent forklift drivers with loads secured to tynes</li> <li>Storm water drain shut off valves</li> <li>Bunded areas</li> <li>Spill kits</li> <li>Spills response training</li> <li>Extraction &amp; Dust collector system clean-out and maintenance procedures</li> <li>Manifest listing DG's stored on site</li> </ul>	LOW
Distribution	<ul style="list-style-type: none"> <li>Truck collision causing spill</li> <li>Forklift loading / unloading truck causing spill</li> </ul>	<ul style="list-style-type: none"> <li>Contact freight company</li> <li>Activate emergency response clean up</li> <li>Barricade spill</li> </ul>	<ul style="list-style-type: none"> <li>Chain of Responsibility Audits</li> <li>Load Restraint</li> <li>EPG's</li> </ul>	MEDIUM

## List of Polluting Substances

\* The site manifest lists the Dangerous Goods types and quantities stored onsite but the below gives a summary and indicates where stored onsite.

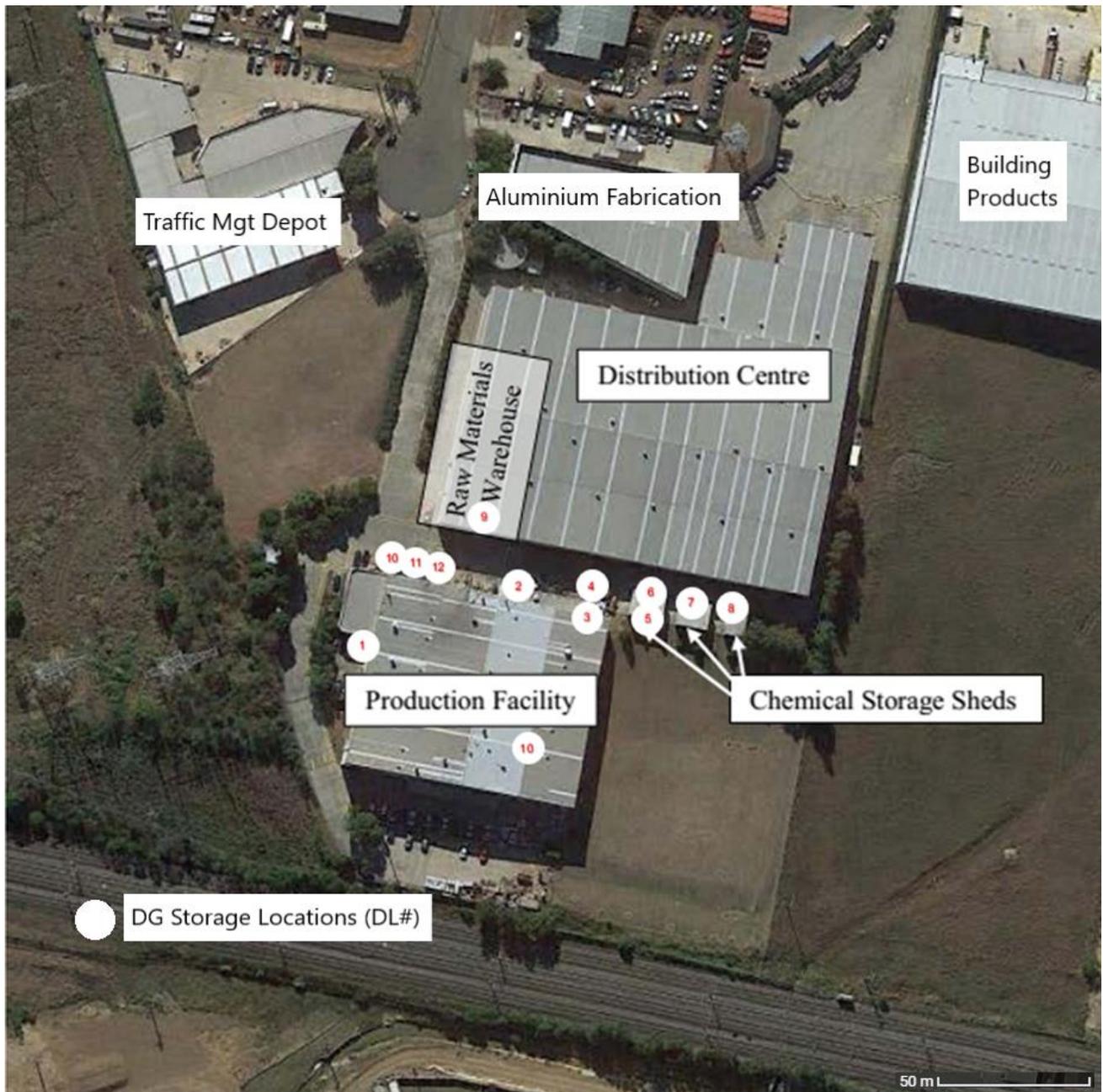
TANK ID NO.	DANGEROUS GOODS				TANK		
	NAME	CLASS / TYPE	UN NO.	PG	TYPE	CAPACITY	DIAMETER
DL1 – UPPER CARPARK	PROPANE	2.1	1978	-	A/G	1260 L	
DL2 – ADJACENT TO BOILER ROOM	PROPANE	2.1	1978	-	A/G	1260 L	
DL2 – ADJACENT TO BOILER ROOM	ACETYLENE	2.1	1001	-	N/A	300 L	
DL2 – ADJACENT TO BOILER ROOM	Argon, Compressed	2.2	1006	-	N/A	300 L	
DL2 – ADJACENT TO BOILER ROOM	Argoshield, Compressed	2.2	1956	-	N/A	300L	
DL2 – ADJACENT TO BOILER ROOM	Petroleum Gases, Liquified	2.1	1075	-	N/A	300 L	
DL3 – OUTSIDE LL2	Oxygen, Compressed	2.2	1072	-	N/A	300 L	

AREA	DANGEROUS GOODS				LARGEST QUANTITY
	NAME	CLASS	UN NO.	PG	
DL4	D-Limonene	3	2319	III	3200L
DL4	Eucalyptus Oil	3	1993	III	800L
AREA	DANGEROUS GOODS				LARGEST QUANTITY
	NAME	CLASS	UN NO.	PG	
DL5	Pesticide, Solid, Toxic, N.O.S. (Rodenone Dust)	6.1	2588	III	2000
DL5	Coumarin Derivative Pesticide, Liquid, Toxic (53691- Brodifacoum L-Blue)	6.1	3026	III	600
DL5	Carbamate Pesticide, Solid, Toxic (Methiocarb)	6.1	2757	II	1200
DL5	Bromoxynil Phenol, Solid, Toxic (R0059)	6.1	2811	III	250
DL5	Phosphoric Acid, Solution	8	1805	III	4000L
DL5	Phosphorus Acid	8	2834	III	4000Kg was 1250L
DL5	Hydrochloric Acid	8	1789	II	1300L
DL5	WARFARIN (22249)	6.1	3027	II	300Kg
DL5	BRODIFACOUM 0.5% (53056)	6.1	3027	II	1500Kg was 300
DL5	CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (2,2-Di-Bromo-3-Nitrilo-Propionamide)	8	3265	III	50L
AREA	DANGEROUS GOODS				LARGEST QUANTITY
	NAME	CLASS	UN NO.	PG	
DL6	Sulphur	4.1	1350	III	7500Kg was 5000kg
DL6	Metaldehyde	4.1	1332	III	5000kg
AREA	DANGEROUS GOODS				LARGEST QUANTITY
	NAME	CLASS	UN NO.	PG	
DL7	Matrilox Perargonic Acid	C2	-	N/A	21000L
DL7	Canola Oil	C2	-	N/A	45000L
DL7	Oilwin (Methyl Salicylate)	C1	-	N/A	1000L
AREA	DANGEROUS GOODS				LARGEST QUANTITY

	NAME	CLASS	UN NO.	PG	
DL8	Potassium Nitrate	5.1	1486	III	5000kg
DL8	Calcium Nitrate	5.1	1454	III	1000kg
DL8	Potassium Hydroxide	8	1814	II	4000Kg
DL8	Caustic Alkali Liquid N.O.S. (PROXEL GXL)	8	1719	II	1000L was 500L
DL8	Potassium Hydroxide Solution	8	1814	II	6000L
DL8	Sodium Percarbonate	5.1	3378	II	1000kg
<b>AREA</b>	<b>DANGEROUS GOODS</b>				<b>LARGEST QUANTITY</b>
	NAME	CLASS	UN NO.	PG	
DL9	Ammonium Nitrate Based Fertiliser	9	-	III	8000kg
DL9	Environmentally Hazardous Substance, Solid	9	3077	III	5000kg
DL9	Environmentally Hazardous Substance, Liquid, N.O.S. (Permethrin)	9	3082	III	20000L
<b>AREA</b>	<b>DANGEROUS GOODS</b>				<b>LARGEST QUANTITY</b>
	NAME	CLASS	UN NO.	PG	
DL10	Ethanol (Ethyl Alcohol)	3	1170	II	250L
DL10	Flammable Liquid, N.O.S.	3	1993	II	250L
DL10	Terpene Hydrocarbons, N.O.S. - (Contains d-Limonene)	3	2319	III	250L
DL10	Maintenance Oil / Grease (Bunded Pallet)	C1	-	N/A	2000L
<b>AREA</b>	<b>DANGEROUS GOODS</b>				<b>LARGEST QUANTITY</b>
	NAME	CLASS	UN NO.	PG	
DL 11	Aerosols	2	1950	-	40000L
DL 11	Ethanol (Ethyl Alcohol)	3	1170	II	15000L
DL 11	Corrosive Liquid N.O.S (CONTAINS BENZALKONIUM CHLORIDE)	8	1760	II	5000L
DL 11	Ammonium Nitrate Based Fertiliser	9	-	III	50000kg
DL 11	Environmentally Hazardous Substance, Solid	9	3077	III	40000kg
DL 11	Environmentally Hazardous Substance, Liquid, N.O.S. (Permethrin)	9	3082	III	270000L

## Site Map – Factory





## Team Training

The pollution response team has been trained in the pollution incident response plan and is made aware of any updates to the plan. The plan will be reviewed as part of the Site Emergency Procedure Review.

The Emergency Team has been trained in spill response procedures and are aware of the hazards on site. As part of the Emergency Response Plan regular evacuation tests are conducted.

## Plan Testing

The plan will be tested as part of the Site Emergency Response Procedure. Specific scenarios will be developed to conduct a trial emergency response.

The plan will be reviewed yearly as part of the Site Emergency Response Procedure Review.

## Reference Documents

DuluxGroup RSK-003: Emergency and Crisis Plans

Yates Mt Druitt Emergency Management Plan v6.6

NSW Environment Protection Authority, Environmental guidelines: Preparation of pollution incident response management plans 2012

## Legislation

Protection of the Environment Operations Act 1997

Protection of the Environment Operations (General) Regulation 2009

## Storage

Copy Type	Location
Hard copy	Yates Mt Druitt Manufacturing Administration Office
Electronic	Public Access Online on Yates Website Site Electronic Plant Dossier