



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
2.5	05/05/2020	DG Update and S&S Review	S&S Advisor
2.4	01/02/2019	S&S Review	Safety & Sustainability Business Lead – Yates
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 Manager
1.0	24/08/2014	Draft plan developed.	Warehouse Manager

Current Revision

Date Implemented	Version	Approval Position	Test / Schedule	Next Review
05/05/2020	2.5	Safety & Sustainability Business Lead – Yates	12 monthly	May 2021

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 Licence 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

Roles Contact ERS (1800 033 111) for connection with any roles listed below	Responsibilities
INCIDENT CONTROLLERS Factory Manager Warehouse Manager	<ul style="list-style-type: none"> • Contact emergency services. • Assess the incident situation and activate the site Emergency Response Team if required. • Prevent further harm by controlling the incident scene, if safe to do so. • Activate the site emergency evacuation procedure, if required. • Manage the site evacuation procedure. • Liaise with emergency services and regulatory authorities. • During emergency evacuation prevent unauthorised access to the site.
EQUIPMENT TECHNICIAN Senior Maintenance leader	<ul style="list-style-type: none"> • Assess the incident scene and co-ordinate any equipment repairs and maintenance.
COMMUNITY LIASON Production Manager	<ul style="list-style-type: none"> • Upon request from the Operations Manager or S&S Manager the production manager will notify direct neighbors and members of the community about the incident. • Assess the incident scene and manage the clean-up and control process.
INCIDENT NOTIFYER Safety & Sustainability Manager Safety & Sustainability Advisor	<ul style="list-style-type: none"> • Immediately (e.g. promptly and without delay) notify appropriate regulatory authorities of the pollution incident or make sure that the incident has been notified. • Obtain and collate information from internal and external services
INTERNAL COMMUNICATIONS MANAGER Operations Manager – Yates	<ul style="list-style-type: none"> • Manage internal communications within DuluxGroup
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 Safety & Sustainability Manager 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	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"> Ignition source in hazardous area Dangerous goods spill Equipment electrical failure 	<ul style="list-style-type: none"> Activate the nearest emergency alarm Contact factory manager to notify emergency services Attack fire if safe to do so Shut down equipment Evacuate to safe assembly area Remain in assembly area until the all clear is given by emergency services and Chief Fire Warden. Clean the area and remove damaged equipment. Hold a debrief session to document site response and determine improvement initiatives. 	<ul style="list-style-type: none"> Extinguishers Hose Reels Sprinkler System Alarm System Fire Team First Attack Training 	MEDIUM
Spill Chemical Liquids Dust Propagation	<ul style="list-style-type: none"> Forklift contact with drum Dropping of drum, pot and other liquid & dust containers Pipework leak Silo damage / leak Racking collapse Raw Material Storage Area Dust collector release Bund pit / overflow 	<ul style="list-style-type: none"> Activate the nearest emergency alarm Contact emergency services if required to assist with spill clean-up. Activate site emergency evacuation procedures if necessary – obtain a copy of the Safety Data Sheet (SDS) for use by emergency services. Review the spill situation and control the source to prevent spreading, entering storm water drains. Barricade spill area to prevent exposure to vapors Ensure spill is contained on site, close drain valves and test first flush water. Use absorbent material to clean the spill Dispose of spill cleanup material appropriately Hold a debrief session to document site response and determine improvement initiatives. Conduct environmental monitoring / review of any spill areas. 	<ul style="list-style-type: none"> Trained and competent forklift drivers with loads secured to tynes Storm water drain shut off valves Bunded areas Spill kits Spills response training Extraction & Dust collector system clean-out and maintenance procedures Manifest listing DG's stored on site 	LOW
Distribution	<ul style="list-style-type: none"> Truck collision causing spill Forklift loading / unloading truck causing spill 	<ul style="list-style-type: none"> Contact freight company Activate emergency response clean up Barricade spill 	<ul style="list-style-type: none"> Chain of Responsibility Audits Load Restraint EPG's 	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.

Storage Area	Site ID	DG Notice ID	Proper Shipping Name	UN No.	Class / Division	PG	Type	Pack Design Capacity	Diameter	Max Store	Typical Quantity
Upper Carpark	Location 1	DL1	Propane	1978	2.1	-	Decanting Cylinders	210kgs Gas Cylinder	N/A	1260L	800L
Adjacent to Boiler Room	Location 2	DL2	Propane	1978	2.1	-	Decanting Cylinders	210kgs Gas Cylinder	N/A	1260L	800L
Outside LL2	Location 3	DL3	Acetylene, Dissolved	1001	2.1	-	Cylinder Store	Gas Cylinder	N/A	300L	50L
Outside LL2	Location 3	DL3	Petroleum Gases, Liquified	1075	2.1	-	Cylinder Store	Gas Cylinder	N/A	300L	300L
Outside LL2	Location 3	DL3	Oxygen, Compressed	1072	2.2	-	Cylinder Store	Gas Cylinder	N/A	300L	150L
Outside LL2	Location 3	DL3	Argon, Compressed	1006	2.2	-	Cylinder Store	Gas Cylinder	N/A	300L	50L
Portable DG Pallet Cabinet	Location 4	DL4	D-Limonene	2319	3	III	Drum Store	200L Drums	N/A	3200L	1600L
Portable DG Pallet Cabinet	Location 4	DL4	Eucalyptus Oil	1169	3	III	Drum Store	200L Drums	N/A	800L	200L
Roofed Storage Shed	Location 5	DL5	Pesticide, Solid, Toxic, N.O.S.	2588	6.1	III	DG Store	Powder bags	N/A	2000	1500
Roofed Storage Shed	Location 5	DL5	Coumarin Derivative Pesticide, Liquid, Toxic	3027	6.1	III	DG Store	Powder bags	N/A	600	200
Roofed Storage Shed	Location 5	DL5	Carbamate Pesticide, Solid, Toxic	2757	6.1	II	DG Store	Powder bags	N/A	1200	500
Roofed Storage Shed	Location 5	DL5	Bromoxynil Phenol, Solid, Toxic	2811	6.1	III	DG Store	Powder bags	N/A	250	100
Roofed Storage Shed	Location 5	DL5	Potassium Hydroxide	1813	8	II	DG Store	Drums / Pails	N/A	4000L	3000L

Storage Area	Site ID	DG Notice ID	Proper Shipping Name	UN No.	Class / Division	PG	Type	Pack Design Capacity	Diameter	Max Store	Typical Quantity
Roofed Storage Shed	Location 5	DL5	Ethanolamine Solution	2491	8	III	DG Store	Drums / Pails	N/A	1250L	960L
Roofed Storage Shed	Location 5	DL5	Phosphoric Acid, Solution	1805	8	III	DG Store	Drums / Pails	N/A	4000L	2100L
Roofed Storage Shed	Location 5	DL5	Phosphorus Acid	2834	8	III	DG Store	Drums / Pails	N/A	1250L	1000L
Roofed Storage Shed	Location 5	DL5	Hydrochloric Acid	1789	8	II	DG Store	Drums / Pails	N/A	1300L	500L
Roofed Storage Shed	Location 5	DL5	Caustic Alkali Liquid N.O.S.	1719	8	II	DG Store	Drums / Pails	N/A	500L	350L
Roofed Storage Shed	Location 5	DL5	Potassium Hydroxide Solution	1814	8	II	DG Store	Drums / Pails	N/A	6000L	5000L
Roofed Storage Shed	Location 5	DL5	Corrosive Liquid, N.O.S.	1760	8	II	DG Store	Drums / Pails	N/A	5000L	4000L
Roofed Storage Shed	Location 6	DL6	Sulphur	1350	4.1	III	DG Store	Powder bags	N/A	5000kg	3000kg
Roofed Storage Shed	Location 6	DL6	Metaldehyde	1332	4.1	III	DG Store	Powder bags	N/A	5000kg	3000kg
Roofed Storage Shed	Location 7	DL7	Matrilox Perargonic Acid	N/A	C1	N/A	DG Store	IBC	N/A	21000L	12,000L
Roofed Storage Shed	Location 7	DL7	Canola Oil	N/A	C1	N/A	DG Store	IBC	N/A	45000L	12,000L
Roofed Storage Shed	Location 7	DL7	Oilwin (Methyl Salicylate)	N/A	C1	N/A	DG Store	Drums	N/A	1000L	800L
Roofed Storage Shed	Location 8	DL8	Potassium Nitrate	1486	5.1	III	DG Store	Powder bags	N/A	5000kg	4000kg
Roofed Storage Shed	Location 8	DL8	Calcium Nitrate	1454	5.1	III	DG Store	Powder bags	N/A	1000kg	500kg

Storage Area	Site ID	DG Notice ID	Proper Shipping Name	UN No.	Class / Division	PG	Type	Pack Design Capacity	Diameter	Max Store	Typical Quantity
Roofed Storage Shed	Location 8	DL8	Potassium Hydroxide	1813	8	II	DG Store	Drums / Pails	N/A	4000L	3000L
Roofed Storage Shed	Location 8	DL8	Ethanolamine Solution	2491	8	III	DG Store	Drums / Pails	N/A	1250L	960L
Roofed Storage Shed	Location 8	DL8	Phosphoric Acid, Solution	1805	8	III	DG Store	Drums / Pails	N/A	4000L	2100L
Roofed Storage Shed	Location 8	DL8	Phosphorus Acid	2834	8	III	DG Store	Drums / Pails	N/A	1250L	1000L
Roofed Storage Shed	Location 8	DL8	Hydrochloric Acid	1789	8	II	DG Store	Drums / Pails	N/A	1300L	500L
Roofed Storage Shed	Location 8	DL8	Caustic Alkali Liquid N.O.S.	1719	8	II	DG Store	Drums / Pails	N/A	500L	350L
Roofed Storage Shed	Location 8	DL8	Potassium Hydroxide Solution	1814	8	II	DG Store	Drums / Pails	N/A	6000L	5000L
Roofed Storage Shed	Location 8	DL8	Corrosive Liquid, N.O.S.	1760	8	II	DG Store	Drums / Pails	N/A	5000L	4000L
Raw Material Warehouse	Location 9	DL9	Ammonium Nitrate Based Fertiliser	2071	9	III	Warehouse	Powder bags	N/A	8000kg	6000kg
Raw Material Warehouse	Location 9	DL9	Environmentally Hazardous Substance, Solid	3077	9	III	Warehouse	Powder bags	N/A	5000kg	3000kg
Raw Material Warehouse	Location 9	DL9	Environmentally Hazardous Substance, Liquid, N.O.S. (Permethrin)	3082	9	III	Warehouse	Powder bags	N/A	20000L	15000L
Maintenance Workshop	Location 10	DL10	Ethanol (Ethyl Alcohol)	1170	3	II	DG Cabinet	Pails	N/A	250L	250L
Maintenance Workshop	Location 10	DL10	Flammable Liquid, N.O.S.	1993	3	II	DG Cabinet	Pails	N/A	250L	250L

Storage Area	Site ID	DG Notice ID	Proper Shipping Name	UN No.	Class / Division	PG	Type	Pack Design Capacity	Diameter	Max Store	Typical Quantity
Maintenance Workshop	Location 10	DL10	Terpene Hydrocarbons, N.O.S. - (Contains d-Limonene)	2319	3	III	DG Cabinet	Pails	N/A	250L	250L
Factory Road – External	Wheat Silo 1	N/A	Wheat (Combustible Dust)	N/A	N/A	N/A	Silo	Silo	N/A	27000 kg	27000 kg
Factory Road – External	Wheat Silo 2	N/A	Wheat (Combustible Dust)	N/A	N/A	N/A	Silo	Silo	N/A	27000 kg	27000 kg
Factory Road – External	Wheat Silo 3	N/A	Wheat (Combustible Dust)	N/A	N/A	N/A	Silo	Silo	N/A	27000 kg	27000 kg
Finished Goods Warehouse	Location 11	DL 11	Aerosols	1950	2	-	Finished Goods Warehouse	Aerosols	N/A	40000L	25000L
Finished Goods Warehouse	Location 11	DL 11	Ethanol (Ethyl Alcohol)	1170	3	II	Finished Goods Warehouse	Units	N/A	15000L	5000L
Finished Goods Warehouse	Location 11	DL 11	Corrosive Liquid N.O.S (CONTAINS BENZALKONIUM CHLORIDE)	1760	8	II	Finished Goods Warehouse	Units	N/A	5000L	2500L
Finished Goods Warehouse	Location 11	DL 11	Ammonium Nitrate Based Fertiliser	2071	9	III	Finished Goods Warehouse	Units	N/A	50000kg	35000kg
Finished Goods Warehouse	Location 11	DL 11	Environmentally Hazardous Substance, Solid	3077	9	III	Finished Goods Warehouse	Units	N/A	40000kg	22000kg
Finished Goods Warehouse	Location 11	DL 11	Environmentally Hazardous Substance, Liquid, N.O.S. (Permethrin)	3082	9	III	Finished Goods Warehouse	Units	N/A	270000L	150000L

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 v5.0

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