



# Pollution Incident Response Management Plan

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## **1. Introduction**

The purpose of the Pollution Incident Response Management Plan (PIRMP) is to outline the actions necessary as a consequence of a pollution incident.

The definition of a pollution incident is:

‘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’

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 Protection of the Environment Operations Act (POEO) as:

- a) Harm to the environment is material if:
  - i. It involves actual or potential harm to the health & safety of human beings or to the ecosystems that is not trivial, or
  - ii. It results in actual or loss of property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such 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. Site Description**

### **2.1 Location**

Refer to Appendix 1 - Site Location

The site is located at 11 Cunningham Street, Moorebank. The site is rectangular, approximately 30m wide by 78 deep and does not slope significantly. It is occupied by the factory, the LPG storage and a flammable store.

The LPG storage consists of four 7kL above-ground tanks, separated from the building and the boundary by a firewall. The flammable store is a roofed store, completely surrounded by a firewall with one fire door and with a concrete floor with a maximum capacity of 40kL.

Aerosol product once filled is sent directly to customers. Product can be held in transit over night before product is despatched.

### **2.2 Surrounding Land**

The site is located in a substantial industrial area.

Stormwater from the site flows into drains leading ultimately to the Georges River.

### 2.3 Manning and Security Arrangements

Manning is 23, including office staff. The factory's normal operating hours are from 6:30 am to 3:30pm Monday to Friday.

## **3. Operations**

### 3.1 General

The main operation of the site is the filling of aerosol products. Products filled at site are either compounded on site or supplied by customers.

The compounding area is bunded to ensure a spill or leak from the compounding vessels are captured.

The handling process consists essentially of the receiving of palletised loads delivered by trucks. The trucks are unloaded on the external hardstand area by forklift and the pallets are then placed in either the flammable liquids or non-flammable liquid store.

### 3.2 Possible Environmental Issues

The most likely environmental emergencies that may be encountered include:

1. LPG gas leak and/or fire. The source being 4 above ground tanks
2. A liquid spill that reaches storm water drain, sewer or natural watercourse. The source will be either from unloading of delivery tankers or the spill of a 205lt drum being transferred between Dangerous Goods drum store and factory.

## **4. Inventory of Pollutants**

### 4.1 Chemicals

As per notification of dangerous goods on premises to WorkCover NSW dangerous goods on site are as follows;

<b>Storage Type</b>	<b>UN No.</b>	<b>Description</b>	<b>Class</b>	<b>Qty</b>
Above ground tank	UN 1978	Propane	2.1	21000L
Above ground tank	UN 1033	Dimethyl Ether	2.1	7000
Roofed Store (Flammable Goods Store)	UN 1090	Acetone	3	15000L
	UN 1263	Paint	3	15000L
	UN 1294	Toluene	3	400L
	UN 1300	White Spirit	3	8000L
Underground Tank	UN 1170	Ethanol	3	15000L

## 4.2 Storage Location

Refer to Appendix 2 Site Map for storage locations

## **5. Emergency Incident Response Procedures**

In case of a pollution incident, the relevant person responsible for activating the plan is as follows:

Name	Position Title	Contact Details
Michael Donovan	Managing Director	0409 545 557

For incidents involving material harm, the fire brigade and/or Hazmat would combat the pollution caused by a spill incident and become the emergency controller. This particularly applies to spills/release which cannot be controlled at the site level.

A spill/release can be the emission of any chemical or substance (ie chemicals or LPG gas) that may potentially enter the stormwater or air.

### 5.1 Notification Procedures

If a pollution incident occurs on site,

1. Immediately engage in harm minimisation measures/spill containment.
2. If the incident presents an immediate threat to human health or the environment and cannot be controlled by the site, contact emergency services on **000** immediately.
3. Assess the level of actual or potential pollution and decide whether the incident is a 'notifiable' incident. If it is considered 'notifiable' the following authorities must be notified as soon as possible:

Authority	Contact Details
Fire & Rescue NSW	000
NSW Environmental Protection Authority	Pollution Hotline 131 555
Safe Work NSW	131 050
Local Council	Liverpool Council 1300 36 2170
NSW Ministry of Health	02 9828 6917, or 02 9391 9000

## 5.2 Communicating with the Community

The Managing Director or nominated representative, upon becoming aware of a notifiable pollution incident occurring, assesses the severity of the incident with regard to impact on properties in the vicinity of the incident. The following will be considered;

- Does the pollution incident have the potential to affect one or more properties?
- How will it affect them (including long and short term effects)?
- What actions need to be taken by the properties to protect them from the harm?

The Managing Director arranges contact to be made with the affected properties by calling or visiting their premises and provides them with the following information relevant to the pollution incident:

- What has happened?
- The Health and safety implications for them
- Corrective actions which have been activated to minimise the harm/prevent further harm
- What to expect?

The immediate neighbouring businesses are as follows,

<b>Business Name</b>	<b>Property Address</b>	<b>Contact Details</b>
R.A.Smith Contracting	13 Cunningham St Moorebank	02 9601 8366
S.F. Manufacturing	U3/7 Cunningham St Moorebank	02 9601 1213
	U2/7 Cunningham St Moorebank	
TBone Shipwrighting	U4/7 Cunningham St Moorebank	02 9137 8928
	U5/7 Cunningham St Moorebank	

## **6. Minimising Harm to Persons on the Premises**

If an incident occurs during normal working hours the activation of the evacuation procedure will take place (refer to Appendix 3).

## **7. Safety Equipment**

To assist in the control of spills a number of Spill Kits are located around the production site.

During the unloading of tankers on site a spill kit will be placed near the stormwater drain. The drain will be covered to ensure product cannot enter drain. The cover will remain on drain until tanker has left site.

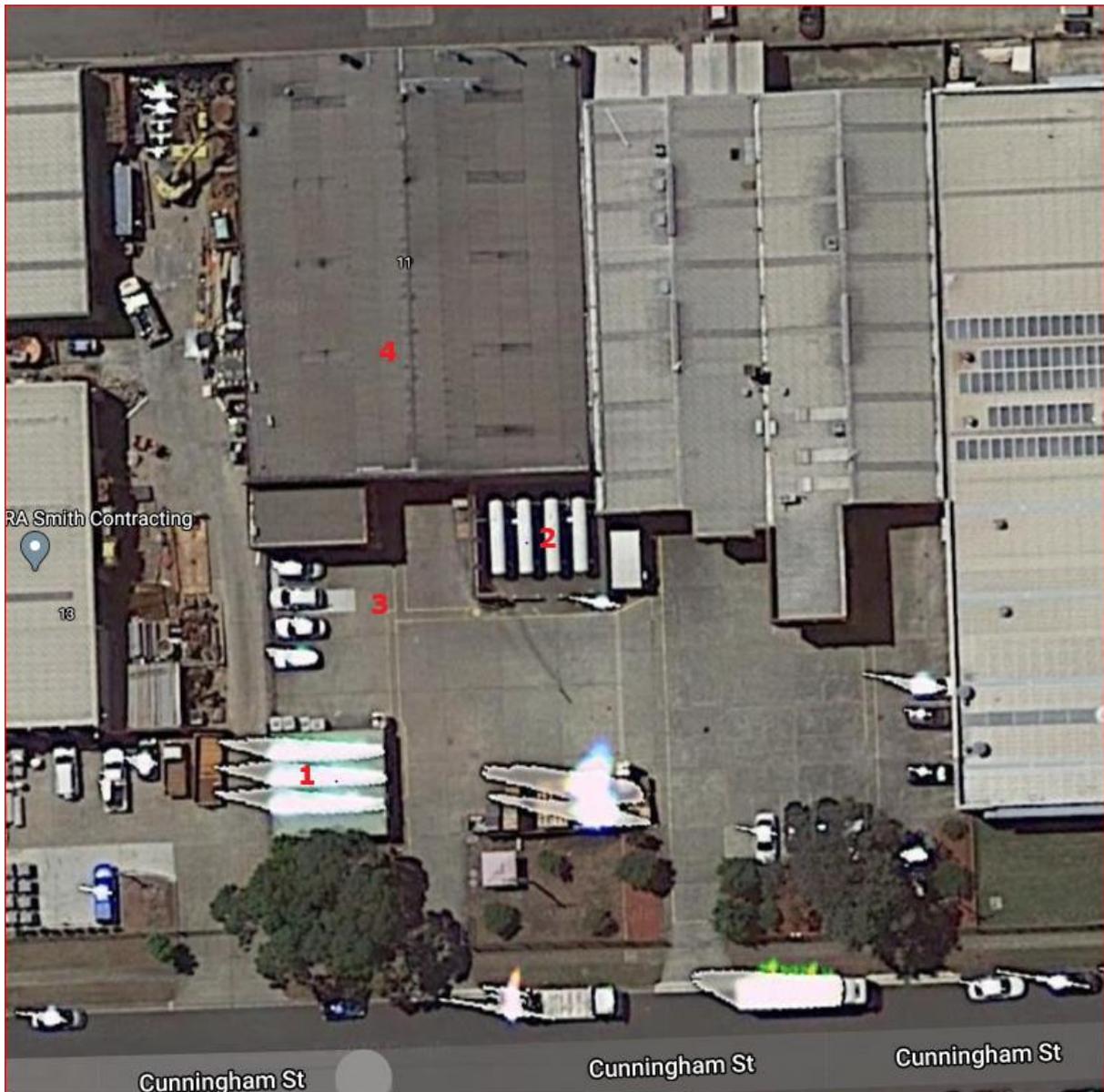
## Appendix 1 - Site Location

9-11 Cunningham Street, Moorebank NSW 2170



Overall site frontage

## Appendix 2 - Site Map



1. Flammable Goods Store
2. Above-ground Gas Tanks
3. Under-ground Alcohol Tank
4. Manufacturing Plant

## Appendix 3 - Site Evacuation Procedure



### EMERGENCY EVACUATION PROCEDURE

1. Depress Emergency Alarm buttons to activate the alarm.
2. Depress Emergency Stop buttons on all machinery where possible.
3. Exit Factory through appropriate door in an orderly manner.
  - (a) Main front door roller, or
  - (b) Exit door on rear west wall under mezzanine.
4. Roll caller to take Employee Name List from point of exit.
5. Once outside of Factory, move to the Emergency Assembly Point located outside the eastern gate of 9 Cunningham Street.
6. Roll call.
7. Notify neighbours of problem, if needed.
8. Call Emergency (Police/Fire/Ambulance) on 000, if needed.

Roll Callers: Tony or Maria

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## Document History

<b>Revision Date</b>	<b>Changes Made</b>	<b>Approved</b>
23/06/2015 REVISION 1	Updates made to reflect comments made by EPA during visit on 9/06/2015	Russel Moreton
28/07/2016	Planned reviewed	Russel Moreton
04/10/2017	Updated	Michael Donovan
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