



SITE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Parchem Construction Supplies
7 Lucca Road, Wyong NSW 2259

Emergency Response

DuluxGroup Emergency Response Service
1800 033 111

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Document Control

Issue	Date	Revision Changes	Revised by
1.	01/03/2011	Response to environmental management scenarios included in site emergency management plan.	Safety & Sustainability Manager
2.	30/08/2012	First inclusion of Pollution Incident Response Plan in site Emergency Management Plan.	Safety & Sustainability Manager
3.	15/11/2013	Pollution response plan updated as part of site Emergency Management Plan.	Safety & Sustainability Manager
4.	08/12/2015	Pollution response plan updated as part of site Emergency Management Plan.	Safety & Sustainability Business Partner
5.	09/02/2016	Site Emergency Management Risk Assessment updated with risks and controls added to Site Emergency Management Plan.	Safety & Sustainability Business Partner
6.	02/02/2016	Pollution response plan updated as part of site Emergency Management Plan.	Safety & Sustainability Business Partner
7.	15/12/2016	Pollution response plan updated as part of site Emergency Management Plan.	Safety & Sustainability Business Partner
8.	09/03/2017	Pollution response plan updated as part of site Emergency Management Plan.	Safety & Sustainability Business Partner
9.	09/02/2018	Plan updated and extracted from Site Emergency Management Plan to be displayed on company website.	Parchem Operations Manager Safety & Sustainability Manager
10.	09/02/2019	Annual Review	Parchem Operations Manager Safety & Sustainability Manager
11.	30/03/2019	List of polluting substances and site map – factory updated.	Safety & Sustainability Manager

Current Revision

Date Implemented	Version	Approval Position	Test / Schedule	Next Review
30/03/2019	11	Operations Manager	12 monthly	30/03/2019

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 Parchem Wyong Site occupies 2.6 hectares at 7 Lucca Road, Wyong NSW 2259. The facility comprises of an administration building, manufacturing area, laboratory and a National Distribution Centre. The site usually operates over two shifts from 6am – 11pm, Monday to Thursday but may operate on Friday and Saturdays pending production demands.

The site is located within an industrial zone with small to medium size industrial facilities bordering the site. The surrounding land use can be broadly summarised as follows:

- **North:** industrial use, including a timber frame manufacturer, steel fabricator, and waste transfer / recycling facility.
- **East:** a vacant lot immediately adjacent to the site, commercial/industrial use further to the east.
- **West:** industrial use, including car wreckers, metal fabrication and a manufacturer of fluid and heat exchange equipment.
- **South:** commercial/industrial use, including mechanics and chemical manufacturers.

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.

Parchem Wyong is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, SafeWork 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 Parchem Wyong 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	Responsibilities
INCIDENT CONTROLLER Operations 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 Maintenance Manager	<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 neighbours and members of the community about the incident. • Assess the incident scene and manage the clean-up and control process.
INCIDENT NOTIFYER Safety & Sustainability Lead Safety & Sustainability Manager	<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 Supply Chain Manager - Parchem	<ul style="list-style-type: none"> • Manage internal communications within DuluxGroup
<p>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</p>	

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 Business Partner.

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 Lead Safety & Sustainability Manager
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	131 388	Operations Manager
Water Supplier	02 4350 5555	Operations Manager
Gas Distributor – AGL	131 909	Operations Manager

Neighbour Contacts

Listed in order of closest proximity to the Parchem Wyong Manufacturing & Distribution buildings

Role required to contact: Production Manager

Type	Location	Company Name	Contact
<p>For confidentiality purposes Neighbour contacts are not in this plan but can be found in the site Emergency Management Procedure. The Emergency Management Procedure is held in site shared drive and stored in the red HAZMAT emergency box at front of site.</p>			

Potential Pollution Incidents

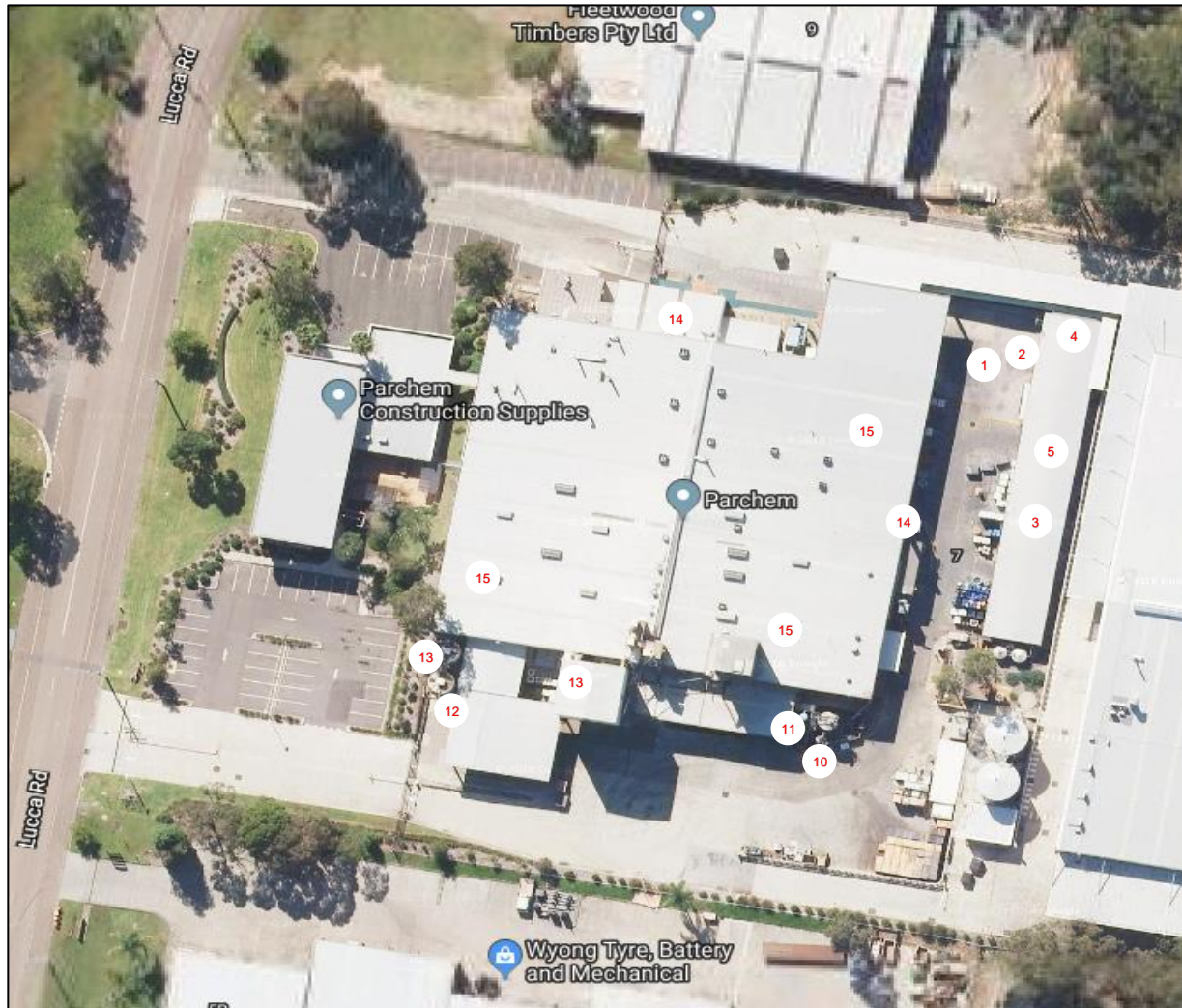
Incident Type	Possible Case / Hazards	Incident Response	Site Controls / Likelihood	Likelihood
Fire	<ul style="list-style-type: none"> Ignition source in hazardous area Dangerous goods spill Equipment electrical failure 	<ul style="list-style-type: none"> Activate the nearest emergency alarm Contact Operation 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 Warehouse Sprinkler System Alarm System Trained Emergency 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"> Review the spill situation and control the source to prevent spreading, entering storm water drains. Ensure spill is contained on site, close storm water drain valves 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. Barricade spill area to prevent exposure to hazardous substances – keep potential ignition sources away from solvent / VOC spill area (e.g. forklifts, electrical equipment) Use absorbent material to clean the spill, if safe to do so. Dispose of spill clean-up 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 Production pot movement by tug 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.

Name / Description	Hazard Type	Maximum Quantity Stored	Type of Storage	Site Map Reference	Controls
Factory Chemicals	DG Class 3	80,000L	Underground Tanks	1	UST's currently emptied with low residues
	DG Class 3	1,000L	Drums	2	Separate and compliance DG storage area
	DG Class 8	25,000L	Drums & IBC's	3	
	DG Class 9	50,000L	Drums & IBC's	4	
	Non DG	40,000L	Drums	5	Uncover storage area
Gases LPG	DG Class 2	9,081L	Cylinder	10	
Nitrogen Tank	DG Class 2	7,000L	Above Ground Tank	11	Located within bund.
Diesel Tank		2,000L	Above Ground Tank	12	Tank located within bund with drip drive over bund in place
Dust Storage	Sand and Cement	25000kg	Silos	13	
	Extraction System	200kgs	Dust Collectors	14	Sealed dust collectors
	Palletised Raw Materials	144250kg	25kgs Bags on Full Pallets	15	Storage in racking.

Site Map – Factory



List of Polluting Substances – Warehouse

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

Name / Description	Hazard Type	Maximum Quantity Stored	Type of Storage	Site Map Reference	Controls
Warehouse Chemicals	DG Class 2	500L	Cylinders	1	LPG cage in place
	DG Class 3	300,000L	Drums & IBC's	2	Separate and compliant DG storage area. Internal to main warehouse building with bunded flooring.
	DG Class 8	32,000kg	Pails, Drums & IBC's	3	
	DG Class 9	50,000kg	Pails, Drums & IBC's	4	
Dust Storage	Palletised Raw Materials	60,000kg	25kgs Bags on Full Pallets	5	Storage in racking.
	Finished Goods	135,000kg	25kg Bags on Full Pallets	5	Storage in racking.

Site Map - Warehouse



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

Parchem Emergency Management Plan v12.0

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	Parchem Wyong Manufacturing Administration Office
Electronic	Parchem Wyong Zeroharm shared drive DuluxGroup Website: http://www.duluxgroup.com.au/Sustainability/Sustainability/default.aspx