

DULUXGROUP DISTRIBUTION CENTRE
3 Harris Avenue
Marsden Park NSW 2765

Pollution Incident Response Management Plan

Version 4

Effective Date: 28 September 2023

Prepared by

Linfox Australia Pty Ltd (ACN 004 718 647)

DOCUMENT CONTROL MANAGEMENT

Document Information

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1.0	20 December 2020	Joshua Marks	Review update
2.0	4 June 2021	Filomena Nemet	Fixed Vapour System
3.0	4 June 2022	Filomena Nemet	Review update Daniel McDonald
4.0	28 September 2023	Filomena Nemet	Review and Update

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1 Purpose

Linfox Australia holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA).

As per the Protection of the Environment Operations Act 1997 (the POEO Act), Marsden Park have prepared, tested, and implemented the 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 that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the site representative will immediately implement this plan.

A written copy of this plan is kept at Marsden Park Reception and is available on request.

The sections as set out in the Protection of the Environment Operations (General) Regulation 2009, Clause 98D are available on the Linfox web <https://www.linfox.com/> or upon written request.

2 Scope and application

The Scope includes the DuluxGroup Marsden Park Warehouse.

3 Procedure

3.1 Environmental Licence Details

Name of Licensee including ABN	Linfox Australia
EPL Number	21014
Premises Name and Address	Linfox DG Facility, 3 Harris Avenue, Marsden Park NSW 2765
Contact Details	Marsden Park Reception 02 8869 7001 Essendon Fields – 03 8340 1000
Website Address	https://www.linfox.com/
Scheduled Activities on EPL	Chemical Storage
Fee based activities on EPL	General Chemical Storage – 0 to 5000kL storage capacity

3.2 Pollution Incident Responsible Person

PERSON/ROLE	RESPONSIBILITIES
<p>Filomena Nemet Regional Distribution Manager Contact: 0412 267 969 Email: filomena_nemet@linfox.com</p>	<p>PIRMP Activation – Notification to relevant Authorities Ensure this procedure and all controls/testing are implemented. Ensure necessary equipment is available and maintained. Review the procedure annually or following a serious event.</p>
<p>Rodney Presgrave Operations Manager Contact: 0427 495 729 Email: Rodney_pregrave@linfox.com</p>	<p>PIRMP Activation – Notification to relevant Authorities Ensure all training has been completed. Review the procedure annually or following a serious event.</p>
<p>Clint Terbogt General Manager – Resources & Industrial Contact: 0400 180 809 Email: clint_terbogt@linfox.com</p>	<p>PIRMP Activation – Notification to relevant Authorities Ensure all training is complete.</p>
<p>Chris Covington NSW Safety and Compliance Manager R&I Contact: 0475 066 254 Email: Christopher_covington@linfox.com</p>	<p>Assist with the review of the procedure annually or following a serious event.</p>
<p>Ruby Diaz Manager Environmental Sustainability Contact: 0456 818 014 Email: Ruby_Diaz@linfox.com</p>	<p>Review PIRMP annually. Support the mitigation of any environmental impacts on site and facilitate liaison with the relevant environmental authorities.</p>
<p>Supervisors/Leading Hands</p>	<p>Ensure the procedure is implemented. Report any incidents immediately and escalate as per the PIRMP. Follow the directions of the Fire Warden.</p>
<p>Fire Warden</p>	<p>Carry out duty as per Emergency Response Plan and PIRMP</p>
<p>All Personnel</p>	<p>Report any incidents immediately. Follow this procedure. Follow the directions of the Fire Warden and/or your supervisor.</p>

4 Reporting Breaches of this Procedure

4.1 Notification to Relevant Authorities

MANDATORY REPORTING	CONTACT
EPA	131 555 – NSW 02 9995 5555 – Interstate
NSW Health	02 9391 9000
Fire and Rescue NSW	000
SafeWork NSW	13 10 50
Blacktown Council	02 9839 2000
Police	000
Ambulance	000

4.2 Notification to Neighbours and Local Community

Vacant land surrounds the site. In the event of a pollution incident regular warnings and updates would be implemented. This would be carried out by

- Direct communication by doorknocking
- Letterbox drops
- Direct phone calls
- Signage

5 Description and Likelihood of Hazards

The hazard identification process must be carried out to identify the potential for harm to the environment associated with site activities. These activities must be those that the Linfox Australia can control and those it can influence, which are within the scope of the Pollution Incident Response Management Plan. All on-site and off-site operations must be considered when performing hazard identification, including those related to normal and abnormal operating conditions, maintenance, emergency situations, accidents and proposed projects including construction activities.

A pollution incident is when any substance is released to the land, air or water that could harm people or the environment.

5.1 Site Hazards identified

- Release of customer product entering drainage system.
- Plant or equipment failure e.g., fuel or oil release.
- Fires and subsequent water entering drainage system.
- Uncontrolled reactions.
- Incompatible products coming into contact.
- Vandalism.

5.2 Hazards Identified

- During site audits and observations.
- Post incidents or events.
- Before new work procedures or new materials are introduced to the site.
- While site activities are being carried out.
- For transport and distribution activities, prior to leaving site.
- During carrying out site activities or processes.
- During the planning phase of projects or construction activities.

The form in Appendix 1: Environmental Hazard Identification Form must be completed on identification of a hazard.

6 Pre-emptive actions to be taken

6.1 Engineered controls

The Marsden Park facility had pollution controls incorporated into the building during construction. These include:

- Water containment
 - Warehouse 440000 Litres
 - Storm water 249000 Litres
 - Docks 150000 Litres
 - Automatically activated shut off when sprinklers engaged.
 - Manually operated release valve (front carpark).
 - Ocean Protect – Ocean Guard system (inspected annually, serviced every 4 months).
- Designated Cut off room for high-risk dangerous goods.
 - Foam suppression.
- Bunded Warehouse
 - 843m³ Bunding to warehouse.
- Fixed Vapour System

6.2 Administrative Controls

Linfox has a responsibility to ensure that operating procedures controlling activities with a significant actual or potential environmental impact are being followed by employees. This specific responsibility for ensuring the implementation of this plan includes the development and management of

- A Risk Register
- Risk Assessments
- Safe Work Processes
- Emergency Response Plan
- Traffic Management Plan
- Inductions
- Training, including:
 - Spill training.
 - DG awareness training.
 - Designated training drills in how to manage a pollution incident.

7 Inventory of Pollutants

Inventory on the site includes packaged paint and hardware as sold under the Dulux and Selleys brands. There are no bulk dangerous goods stored on the site.

The dangerous goods classes store on site are:

- Class 2.1 Aerosols
- Class 3 Flammable liquid
 - Packing group ii and iii
- Class 6.1 Toxic
- Class 8 Corrosive
- Class 9 Miscellaneous dangerous goods
- Non-Dangerous Goods acrylic paint

Refer to the Dangerous Goods Gate Manifest.

8 Safety Equipment

The Site has completed a risk assessment for:

- Dangerous Goods kept on site.
- Fixed Vapour System.
- First Aid and Housekeeping are included in task specific risk assessments.

As a result of the risk assessments the sites have the following equipment:

- Fixed Vapour System sensors.
- Fire suppression systems – automatic sprinkler systems.
- Spill kits – (absorbent material, drain mats).
- Emergency eyewash/showers.
- First aid kits.
- Automatic external defibrillator.
- PPE as per safety data sheets.

9 Minimising Harm to Person on the Premises

The site has an extensive Emergency Response Plan. Environmental events are incorporated within that plan.

The site has:

- Trained Evacuation Wardens.
- Trained First Aiders.

10 Actions to be Taken During or Immediately after a Pollution Incident

In the event of a pollution incident the following actions are to be taken where applicable:

- Assess the area and ensure safety to yourself and others.
- Action the Emergency Response Plan.
- Implement environmental controls such as spill kits etc.
- Notification and escalation to Linfox Management.
- Engage ISS First Response.
- Linfox relevant reporting processes.
- Notification to reporting Organisations.

10.1 Environmental Hazard Identification and Risk Assessment Procedure

- Identification of risks associated with pollution incidents.
- Assessment and implementation of control measures.
- Identification of hazards and reporting in Hazard Identification Form.
- Development of a site-specific risk register.

10.2 Spill Response Procedure

- Dealing with spills on/off site – methodology.
- PPE requirements.
- Emergency contacts – site managers to be aware that details must be kept onsite.
- Disposal of contaminated material.
- Incident reporting.

11 Staff Training

All staff are trained to respond to initial pollution risks including:

- Safe work processes.
- Emergency Response Plan.
- Traffic Management Plan.
- Fixed Vapour System.
- Toolbox talks.
- Participation in annual drill (mock scenarios)

12 Review and Testing – Refer to Clause 98(1)







PIRMP will be reviewed annually or in the following circumstances.

- Within one month after a pollution incident to ascertain the effectiveness of the plan and to implement identified improvements.
- After any change to the building or drainage design.
- In the event of new product or an increase in storage levels.

All reviews should be completed to with a continuous improvement approach to increase the effectiveness of the plan.

PIRMP Procedure



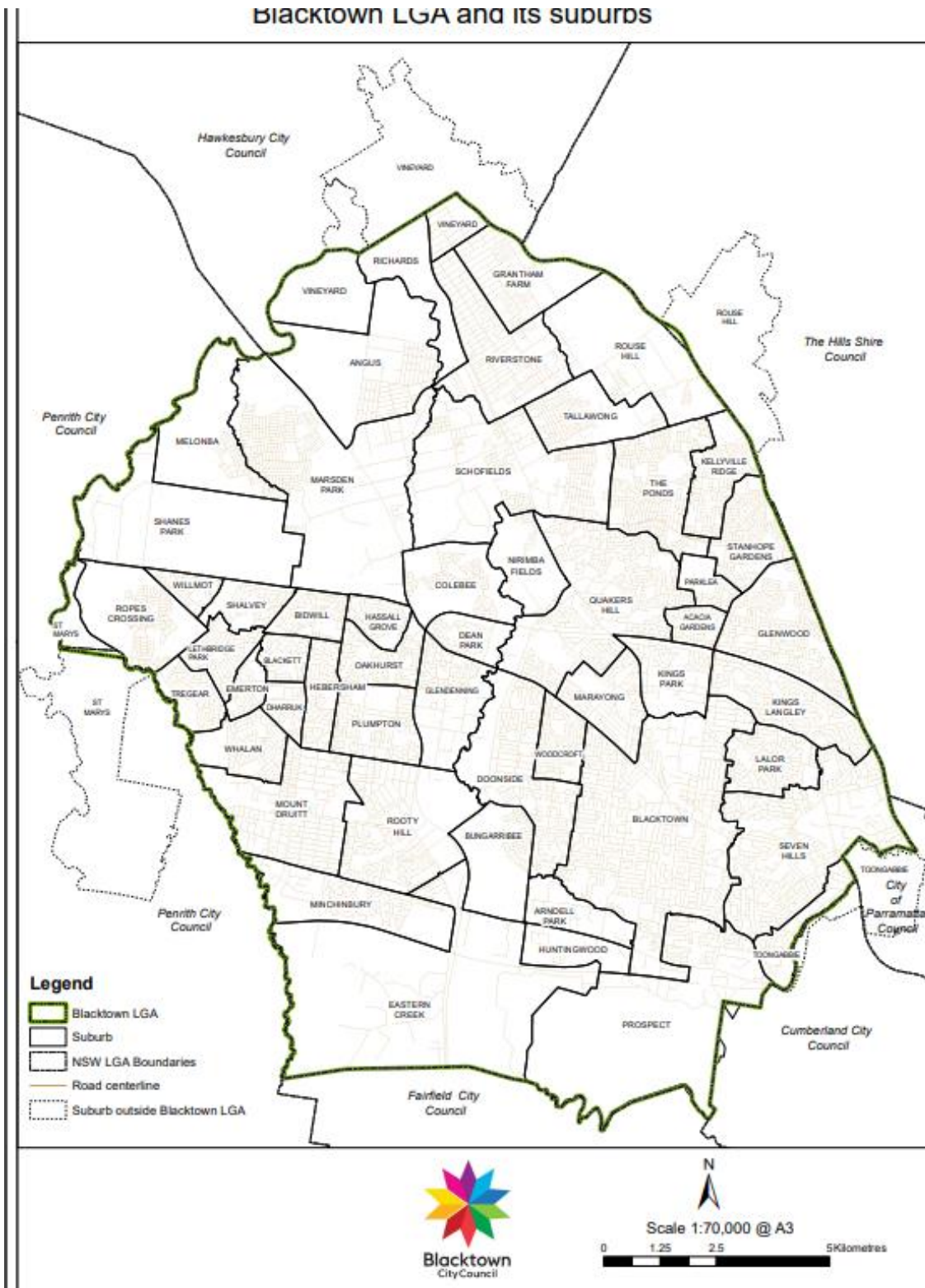
Spill Emergency PIRP	
STEP	OPERATING INSTRUCTION
	If a spill occurs – STOP, CONTAIN, REPORT, CLEAN UP
	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <small>EYE PROTECTION MUST BE WORN</small> </div> <div style="text-align: center;">  <small>FOOT PROTECTION MUST BE WORN</small> </div> <div style="text-align: center;">  <small>PROTECTIVE CLOTHING MUST BE WORN</small> </div> <div style="text-align: center;">  <small>HAND PROTECTION MUST BE WORN</small> </div> <div style="text-align: center;">  <small>NO SMOKING NO IGNITION SOURCES</small> </div> <div style="text-align: center;">  <small>FIRE RISK</small> </div> </div> <p style="text-align: center;">MUST BE WORN WARNING</p>
1	Attend to the spill immediately, no matter how small .
2	If it is safe to do so, STOP the spill at its source.
3	Use spill control & absorbent materials over the entire spill area, to CONTAIN the spill, if it is safe to do so.
4	REPORT the spill to your supervisor.
5	Inform the Chief Warden & HSSE Coordinator of the situation.
6	Ensure that any absorbent materials & other equipment used to CLEAN UP spills are disposed of appropriately.
7	While spills should not be hosed away, any water used for cleaning up & decontaminating spills needs to be treated as contaminated waste water & should not be allowed to enter stormwater drains or watercourses.
8	Spills should be covered & protected from stormwater runoff during rainfall to the extent that it does not compromise clean up activities.
9	Contact NSW Fire Brigade '000' immediately if the spill involves a hazardous substance or if you suspect that the spill will escape to the environment.
10	Record all incidents of spills & ensure that they are reported to management.
11	Investigate the cause of each spill & ensure that precautionary action is implemented to reduce the risk of a similar incident occurring.

Diesel Tank PIRP	
STEP	OPERATING INSTRUCTION
1	Ascertain nature & extent of spill.
2	Isolate the source of the spill.
3	Contain spill using appropriate spill kits located within the area.
4	Contact Emergency Services if Diesel Tank is on fire.
5	Evacuate the site as per emergency response procedure
	PRIORITY 1 EMERGENCY – CALL:
1	Fire Brigade – 000 / EPA – 131 555
2	Contact Duty Manager
3	HSSE Coordinator
4	Facilities Supervisor
	Examples of Priority 1 Emergency Situations
1	Incident that has or has the potential to significantly impact upon the environment including fire.
2	Liquids other than water entering storm water drain (i.e. Spillage from a tank)
	PRIORITY 2 EMERGENCY – CALL:
1	Contact Duty Manager
2	HSSE Coordinator
3	Facilities Supervisor
	Examples of Priority 2 Emergency Situations
1	Tank bund levels at/or approaching maximum capacity.
2	Damage to plant including tanks, piping & associated equipment.

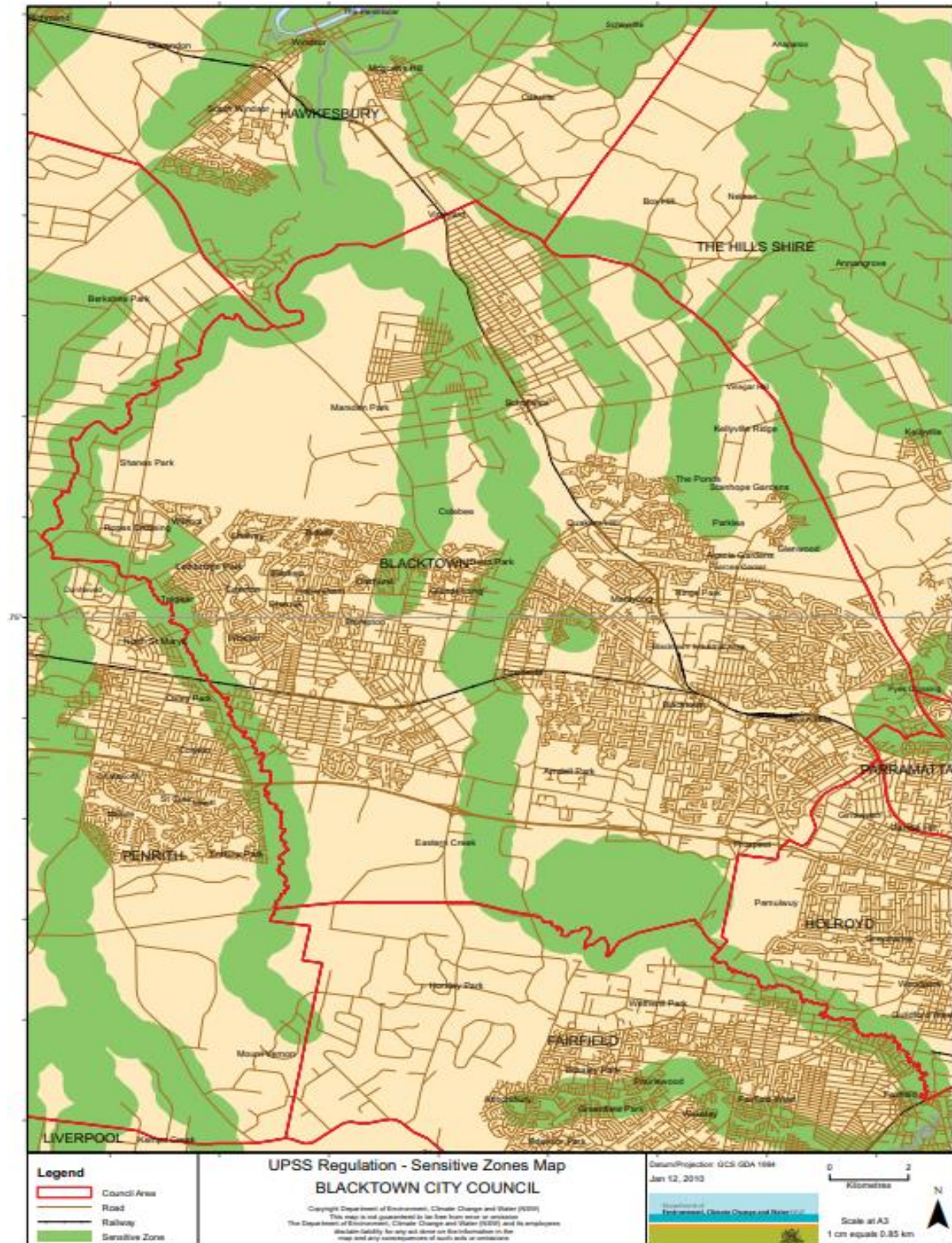
NOTE: All incidents must be reported to management immediately

Fire Emergency PIRP	
STEP	OPERATING INSTRUCTION
	In the event of a fire:
1	Alert others in the area of the fire.
2	Move away from the fire affected area immediately.
3	Notify the nearest Warden.
4	Inform the Chief Warden of the situation.
5	If the Chief Warden deems necessary, the Evacuation Alarm will be activated.
6	Notify a First Aider if there is an injured person.
7	Wardens to contain small fires, if safe to do so.
8	Personnel are to evacuate and proceed to the Emergency Assembly Point .
9	Follow instructions of Wardens.
10	Close non escape doors as you leave.
11	No person is to re-enter the premises under any circumstances until the emergency services have deemed it safe to do so. The Chief Warden will advise you when it is safe to re-enter the premises.

13 Maps



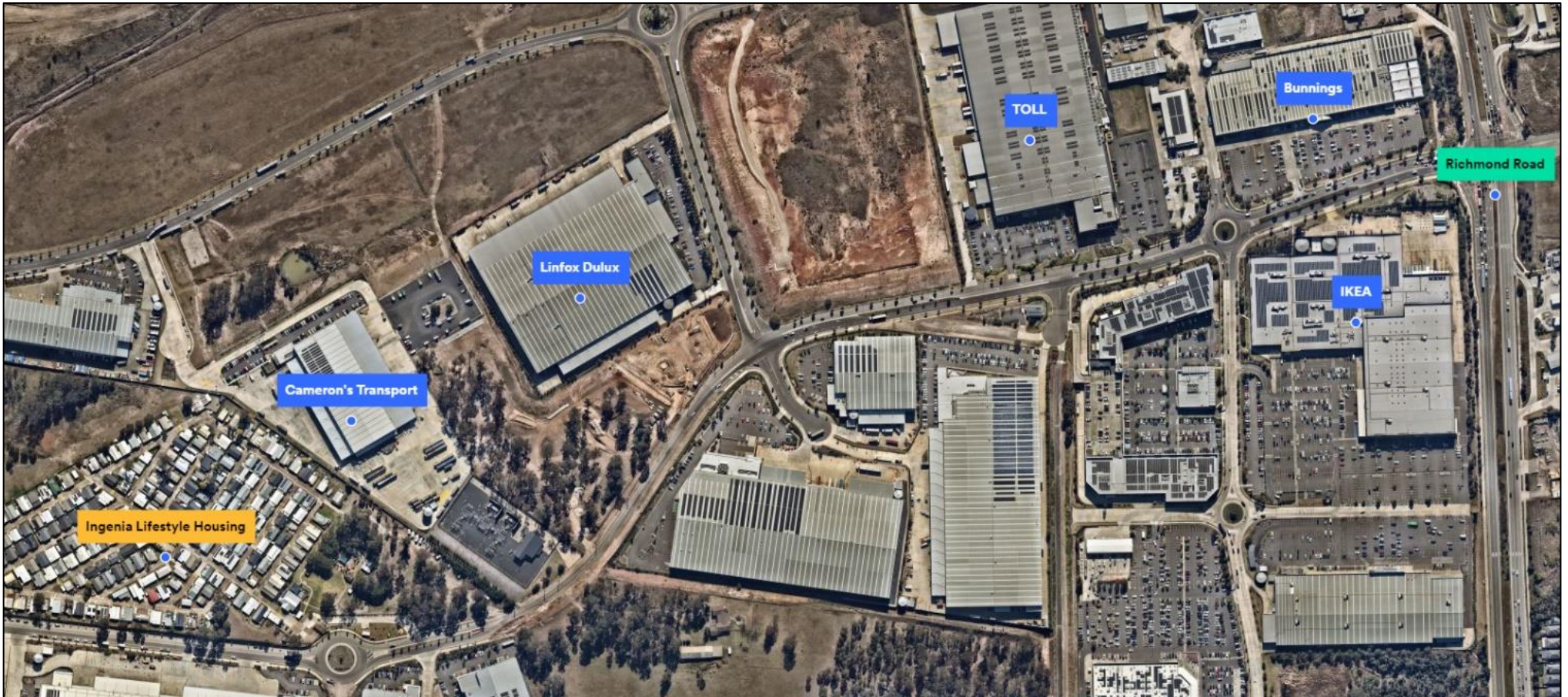
PIRMP Procedure



PIRMP Procedure



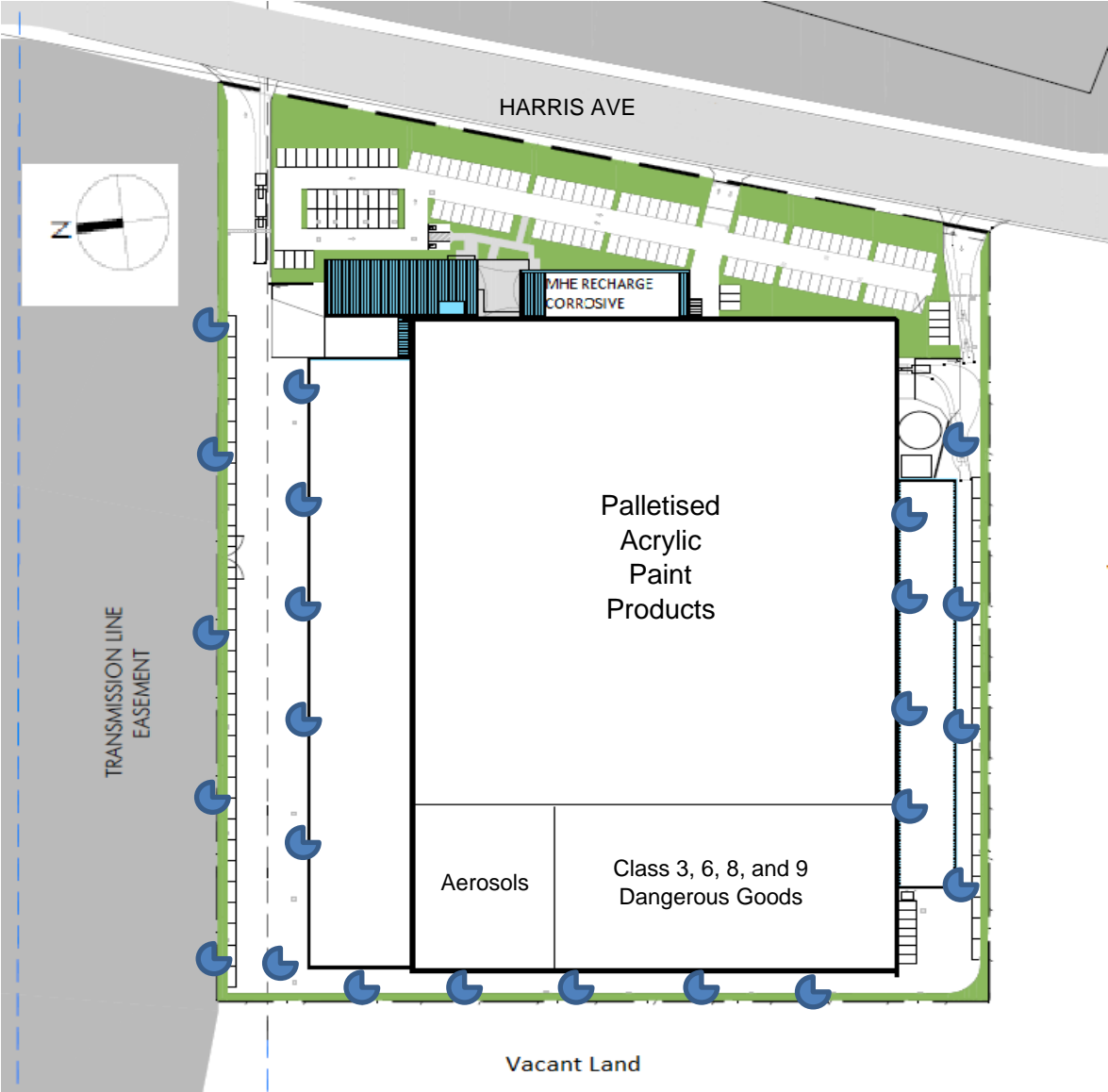
Surrounding Businesses



PIRMP Procedure



Drain Locations



 Drains

PIRMP Procedure



Manual Release Valve – Front of Office Block



FlameSafe Fire Protection Pty. Limited

Incorporated in NSW (ACN 071 734 283)

UNIT 2, 8-10 MARY PARADE
RYDALMERE N.S.W 2116

Phone No: (02) 9638 1662
Fax No: (02) 9638 3665

LINFOX LOGISTICS FACILITY, 3 HARRIS AVENUE
SYDNEY BUSINESS PARK, MARSDEN PARK

FIRE DETECTION BLOCK PLAN

IN THE EVENT OF A FIRE RING '000' TO ENSURE FIRE SERVICE RESPONSE

FIP MAKES AMPAC	MODELS- FIREFINDER
DETECTION ZONES	DESCRIPTION
01	Sprinkler Installation 1 Pressure Switch
02	Sprinkler Installation 2 Pressure Switch
03	Sprinkler Installation 3 Pressure Switch
04	Sprinkler Installation 4 Pressure Switch
05	Sprinkler Installation 5 Pressure Switch
06	Sprinkler Installation 6 Pressure Switch
07	Dangerous Goods Detection Installation 1
08	Warehouse Detection Installation 2
09	Warehouse Detection Installation 3
10	Warehouse Detection Installation 4
11	Office Detection
12	Battery Charge Detection
13	Airraid Beep
14	DD Cutoff Floor
15	Sprinkler Installation 1 Tamper
16	Sprinkler Installation 2 Tamper
17	Sprinkler Installation 3 Tamper
18	Sprinkler Installation 4 Tamper
19	Sprinkler Installation 5 Tamper
20	Sprinkler Installation 6 Tamper
21	Pump 1 Run
22	Pump 1 Fault
23	Pump 1 Suction Tamper
24	Pump 1 Discharge Tamper
25	Pump 2 Run
26	Pump 2 Fault
27	Pump 2 Suction Tamper
28	Pump 2 Discharge Tamper
29	Tank Outlet Valve Tamper

LEGEND:-

- FIRE INDICATOR PANEL
- ELECTRICAL SWITCH BOARDS
- FIRE ZONES
- WAREHOUSE EXHAUST FAN
- WAREHOUSE SUPPLY FAN
- PENSTOCK VALVE

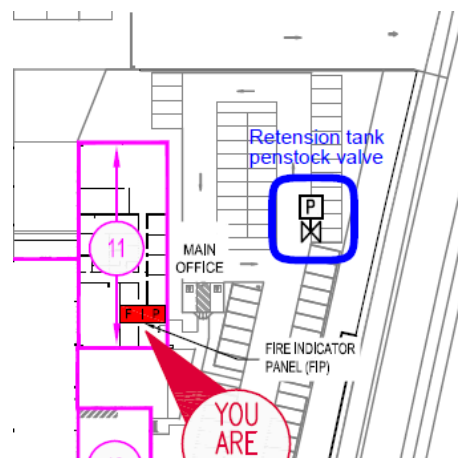
NOTES:-

- OCCUPANT WARNING SYSTEM DESIGNED TO BCA REQUIREMENTS E2.2a CLAUSE 6 AND AS1670.1-2004 AND CORE ENGINEERING GROUP FIRE ENGINEERING REPORT NO. 20117_FER_06 DATED 18 MARCH 2016 & FIRE SAFETY STUDY REPORT BY RAW RISK REPORT NO. SR14077_REV(3) DATED 18 MARCH 2016.
- SMOKE DETECTION SYSTEM DESIGNED TO BCA REQUIREMENTS E2.2a CLAUSE 4, AS1670.1-2004 AND AS1686.1-1998 TO NOMINATED AREAS AND CORE ENGINEERING GROUP FIRE ENGINEERING REPORT NO. 20117_FER_06 DATED 18 MARCH 2016 & FIRE SAFETY STUDY REPORT BY RAW RISK REPORT NO. SR14077_REV(3) DATED 18 MARCH 2016.

SYSTEM INSTALLED 2016

SITE NUMBER: 39A152

INSTALLATION CONNECTED TO ALARMS MONITORING STATION



NSW FIRE & RESCUE - FIRE FAN CONTROL INSTRUCTIONS

THESE CONTROLS SHALL BE OPERATED BY AUTHORIZED PERSONAL ONLY

- RUN - Indicates Fan is Running
- FAULT - Indicates Fan has a Fault
- STOP - Indicates Fan is Stopped

PUSH THIS BUTTON TO START FAN: ON - Indicates Manual Control Run

PUSH THIS BUTTON TO STOP FAN: OFF - Indicates Manual Control Stop

AUTO - Indicates Automatic Control

14 Definition

This table defines the terms used throughout this procedure.

Term	Definition
Environment	Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
Environmental hazard	A source or situation with the potential for harm to the environment.
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly, or partially resulting from a hazard
Likelihood	Probability of an occurrence over time.
Risk	Combination of probability and impact of a specified hazard.
Risk control	Measures for elimination or reduction of identified risks using the hierarchy of controls.
Risk assessment	The process of determining risk levels associated with a particular activity, or process.
Risk register	List of hazards and risks associated with a particular site, which has risk levels associated with each hazard with existing and additional control measures.

15 References

15.1 Legislation

- Marsden Park EPA Licence
- Environmentally Hazardous Chemicals Act 1985

15.2 Policies

- Linfox Sustainability Policy

15.3 Procedures

- LIN0034 Dangerous Goods and Hazardous Chemicals
- LIN0034C Storage of Dangerous Goods and Hazardous Chemicals


15.4 Other documentation

- Marsden Park Manifest
- Site SWP

16 Appendix 1

vision ZERO

ZERO Fatalities
ZERO Injuries
ZERO Motor Vehicle Accidents
ZERO Net Environmental Emissions
ZERO Tolerance of Unsafe Behaviour & Practices



LINFOX ENVIRONMENTAL MANAGEMENT SYSTEM: LIN-EMS-01
ENVIRONMENTAL HAZARD IDENTIFICATION AND RISK ASSESSMENT Page 9 of 23

Appendix 1: [LIN-EMS-F1 - Environmental Hazard Identification Form](#)

To Be Completed by Person Reporting the Environmental Hazard

Name: _____

Site: _____ Date: _____

Site Address: _____

Description of Hazard: _____

Type of Hazard:

- Chemical / Material / Substance
- Equipment
- Vehicles
- Work practice eg handling of fuel and oil
- New work
- Waste management

Location: _____

Risks: (use procedure defined in LIN-EMS-01 Environmental hazard identification & risk assessment procedure)

Risk Level:

Low Moderate High/Extreme

Agreed Corrective/Preventative Actions & Risk Controls: _____

Review and Sign Off:

- A risk assessment has been conducted for the hazard and control measures and corrective / preventative actions have been identified.
- All relevant personnel have been informed of the risks, control measures and corrective/preventative actions

Other Comments

Manager's Name: _____

Signature: _____

Date: _____

Report / Copy to:
Site or Workshop Manager

This is a 'controlled document'