

## **DULUXGROUP DISTRIBUTION CENTRE**

**3 Harris Avenue**

**Marsden Park NSW 2765**

## **Pollution Incident Response Management Plan**

Version 5

Effective Date: 27 September 2024

Prepared by

**Linfox Australia Pty Ltd (ACN 004 718 647)**

## DOCUMENT CONTROL MANAGEMENT

### Document Information

<b>Approved By:</b>	Stewart Kennedy	<b>Accountable Executive:</b>	Dulux Marsden Park DC Manager
<b>Date Approved:</b>	04/06/2021	<b>Responsible Function:</b>	<b><i>Marsden Park DC Manager</i></b>
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### Document History

Version	Date Approved	Approved by	Description of Revision
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
5.0	27 September 2024	Stewart Kennedy	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	<a href="https://www.linfox.com/">https://www.linfox.com/</a>
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
Stewart Kennedy Regional Manager Contact: 0488 778 156 Email: <a href="mailto:stewart_kennedy@linfox.com">stewart_kennedy@linfox.com</a>	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.
Danyal Gudul Business Improvement Manager Contact: 02 8869 7018 Email: <a href="mailto:danyal_gudul2@linfox.com">danyal_gudul2@linfox.com</a>	PIRMP Activation – Notification to relevant Authorities Ensure all training has been completed. Review the procedure annually or following a serious event.
Clint Terbogt General Manager – Resources & Industrial Contact: 0400 180 809 Email: <a href="mailto:clint_terbogt@linfox.com">clint_terbogt@linfox.com</a>	PIRMP Activation – Notification to relevant Authorities Ensure all training is complete.
Alec Maple NSW Safety and Compliance Manager Contact: 0435 899 784 Email: <a href="mailto:alec_maple@linfox.com">alec_maple@linfox.com</a>	Assist with the review of the procedure annually or following a serious event.
Ruby Diaz Manager Environmental Sustainability Contact: 0456 818 014 Email: <a href="mailto:Ruby_Diaz@linfox.com">Ruby_Diaz@linfox.com</a>	Review PIRMP annually. Support the mitigation of any environmental impacts on site and facilitate liaison with the relevant environmental authorities.
Supervisors/Leading Hands	Ensure the procedure is implemented. Report any incidents immediately and escalate as per the PIRMP. Follow the directions of the Fire Warden.
Fire Warden	Carry out duty as per Emergency Response Plan and PIRMP
All Personnel	Report any incidents immediately. Follow this procedure. Follow the directions of the Fire Warden and/or your supervisor.

## 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.

All hazards identified are to be entered into FoxSafe with assigned responsibilities and due dates allocated.

## 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
  - 843m<sup>3</sup> 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.

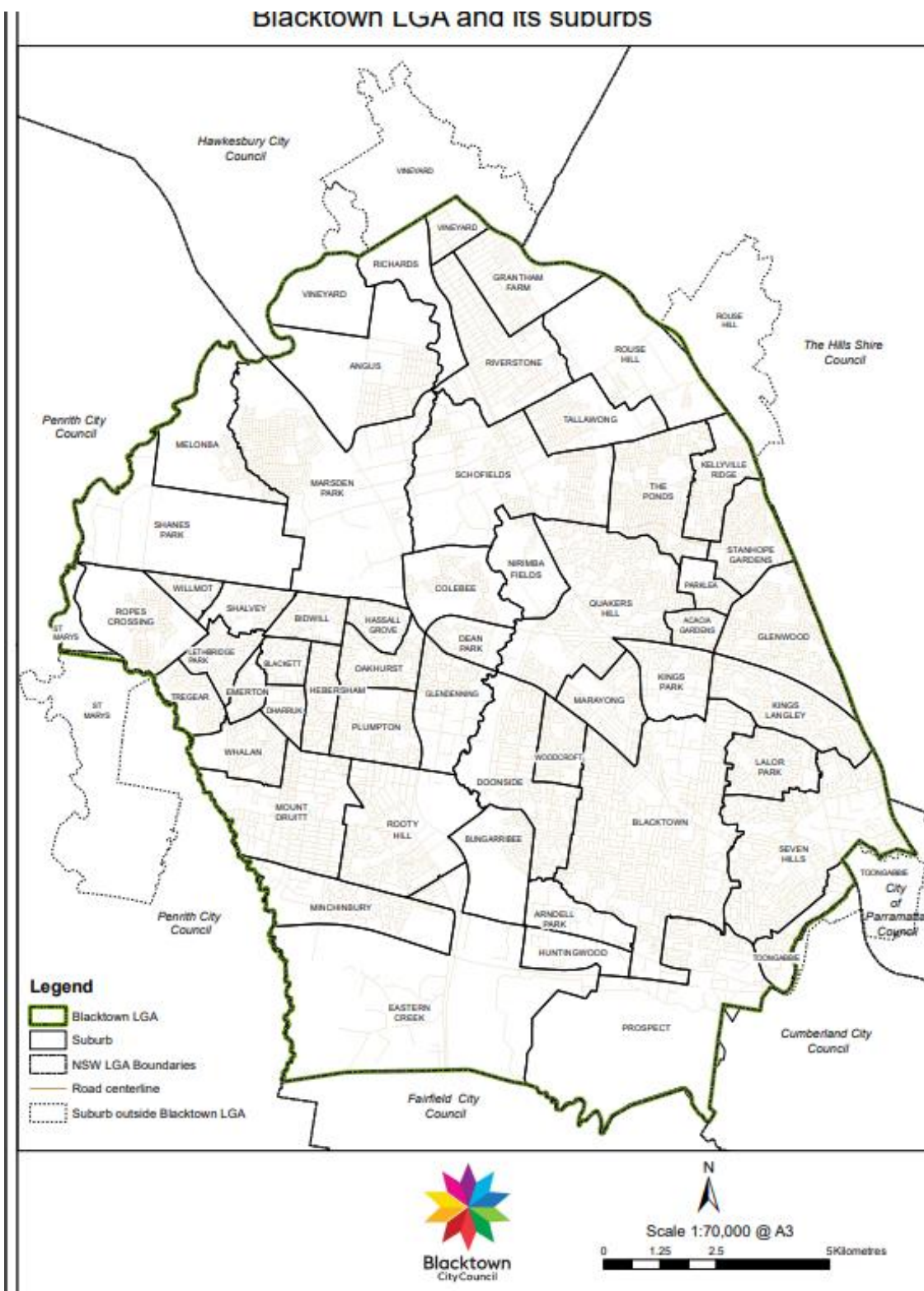
Spill Emergency PIRP	
STEP	OPERATING INSTRUCTION
	If a spill occurs – <b>STOP, CONTAIN, REPORT, CLEAN UP</b>
	<div>       </div> <div> <b>MUST BE WORN</b> <b>WARNING</b> </div>
1	Attend to the spill immediately, <b>no matter how small</b> .
2	If it is safe to do so, <b>STOP</b> the spill at its source.
3	Use spill control & absorbent materials over the entire spill area, to <b>CONTAIN</b> the spill, if it is safe to do so.
4	<b>REPORT</b> 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 <b>CLEAN UP</b> 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 <b>NSW Fire Brigade '000'</b> 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.

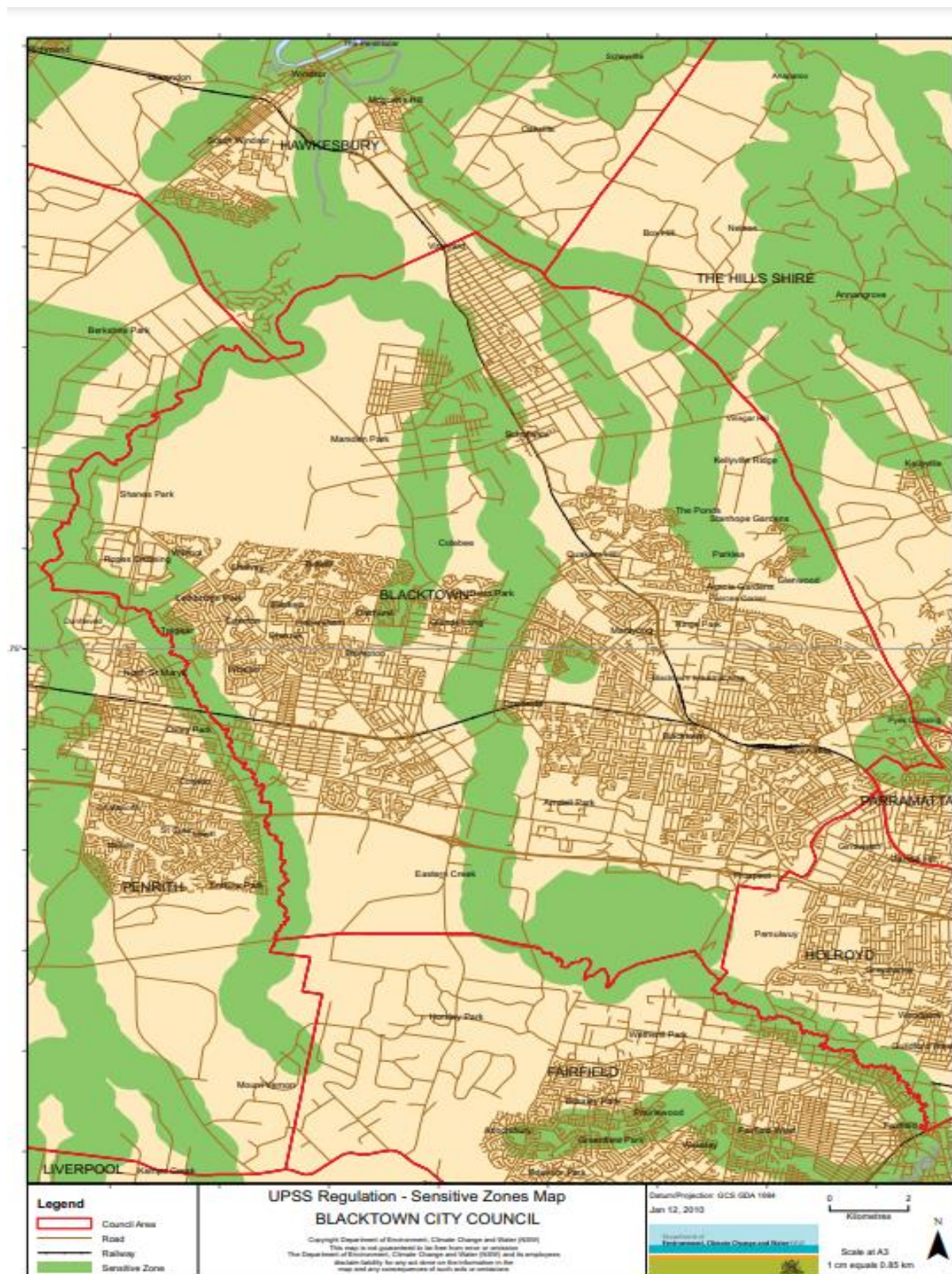
Diesel Tank PIRP	
STEP	OPERATING INSTRUCTION
1	Ascertain nature & extent of spill.
2	Isolate the source of the spill.
3	Contain spill using appropriate spill kits located within the area.
4	Contact Emergency Services if Diesel Tank is on fire.
5	Evacuate the site as per emergency response procedure
	<b>PRIORITY 1 EMERGENCY – CALL:</b>
1	Fire Brigade – 000 / EPA – 131 555
2	Contact Duty Manager
3	HSSE Coordinator
4	Facilities Supervisor
	<b>Examples of Priority 1 Emergency Situations</b>
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)
	<b>PRIORITY 2 EMERGENCY – CALL:</b>
1	Contact Duty Manager
2	HSSE Coordinator
3	Facilities Supervisor
	<b>Examples of Priority 2 Emergency Situations</b>
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**

	<b>Fire Emergency PIRP</b>
<b>STEP</b>	<b>OPERATING INSTRUCTION</b>
	<b>In the event of a fire:</b>
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 <b>Emergency Assembly Point</b> .
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

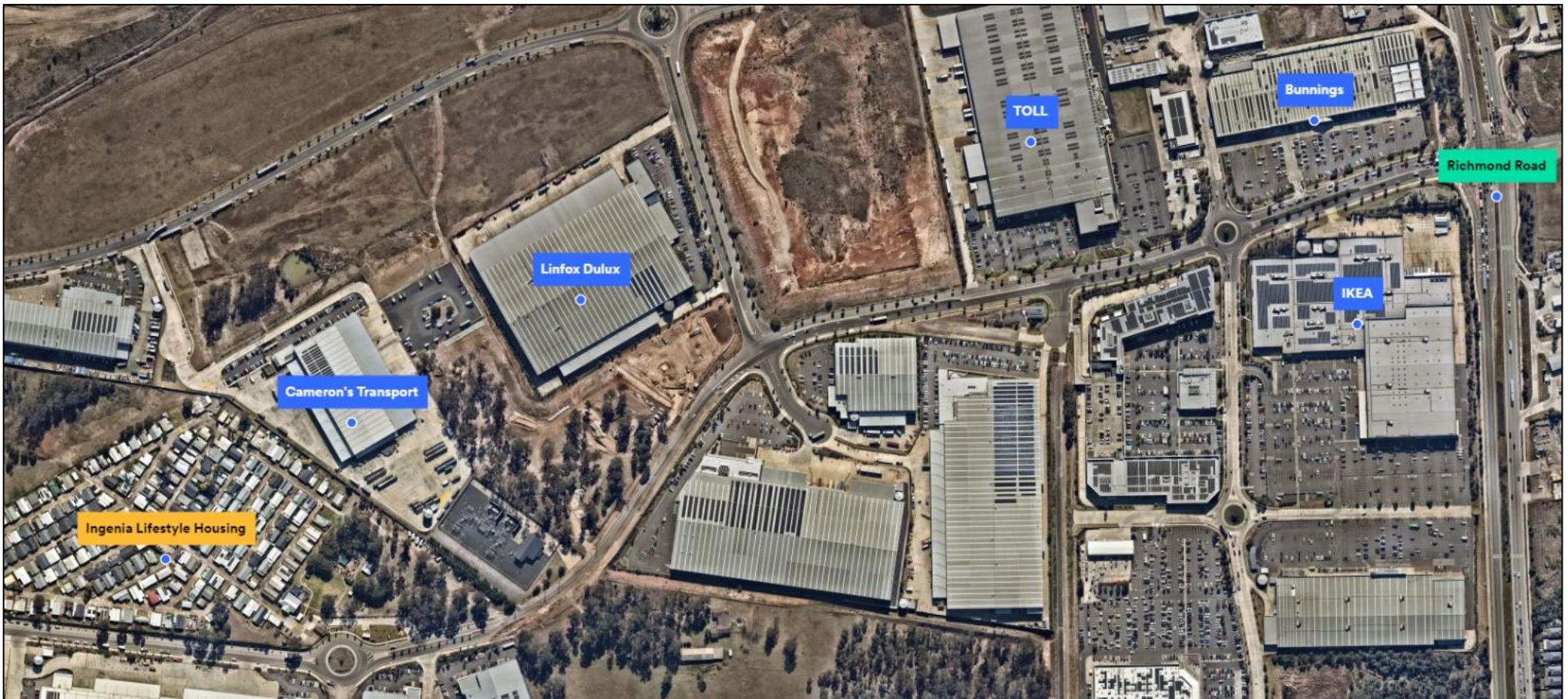




# PIRMP Procedure



## Surrounding Businesses



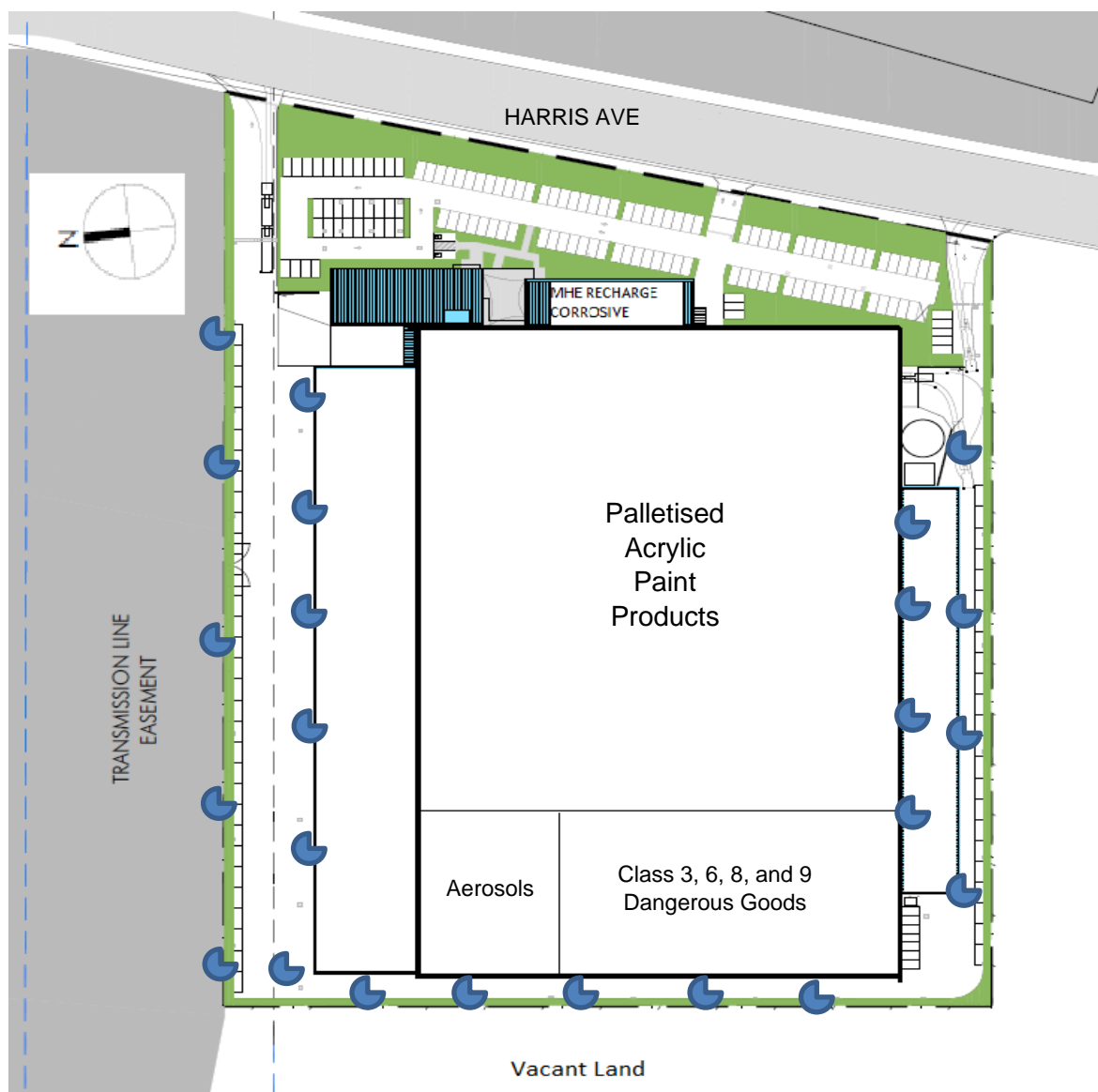
Dulux Marsden Park  
Pollution Incident Response  
Management Plan  
Version No: 4  
Issue Date: 28/09/2023

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UNCONTROLLED WHEN PRINTED

## Drain Locations



Drains

# PIRMP Procedure



## Manual Release Valve – Front of Office Block



**FlameSafe Fire Protection Pty. Limited**

Incorporated in NSW (ACN 071 734 293)

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 MARKS AWPAC	MODELS - FIREFINDER
DETECTION ZONES	DESCRIPTION
01	Sprinkler Installation 1 Pressure Station
02	Sprinkler Installation 2 Pressure Station
03	Sprinkler Installation 3 Pressure Station
04	Sprinkler Installation 4 Pressure Station
05	Sprinkler Installation 5 Pressure Station
06	Sprinkler Installation 6 Pressure Station
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 Store
14	DO Cutoff Point
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

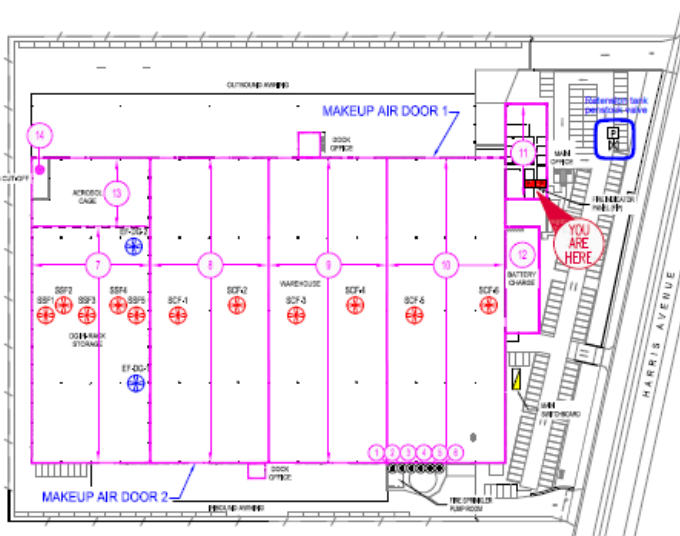
### NOTES:-

- 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 AS1688.1-1998 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

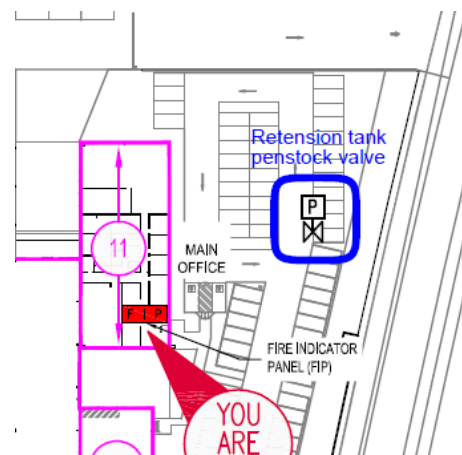
INSTALLATION CONNECTED TO ALARMS MONITORING STATION



### 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
  - ON - Indicates Manual Control Run
  - AUTO - Indicates Automatic Control
  - OFF - Indicates Manual Control Stop
- PUSH THIS BUTTON TO START FAN
- PUSH THIS BUTTON TO STOP FAN



## 14 Definition

This table defines the terms used throughout this procedure.

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