

LINFOX INGLEBURN DISTRIBUTION CENTRE

4 Inglis Road

Ingleburn NSW 2765

Pollution Incident Response Management Plan

Version 5

Effective Date: 22/04/2025

Prepared by

Linfox Australia Pty Ltd (ACN 004 718 647)

DOCUMENT CONTROL MANAGEMENT

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2.0	09/06/2022	Louie Gonzales	Include drain location diagram
3.0	28/04/2023	Steve Krstevski	Update contacts
4.0	08/04/2024	Ryan Thew	Update contacts Update Appendix 1
5.0	22/04/2025	Ryan Thew	Update to include raw materials.

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1 Purpose

Linfox Australia holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for General Chemical Storage

As per the Protection of the Environment Operations Act 1997 (the POEO Act), Ingleburn has 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 during the course of an activity where 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 hard copy of this plan is kept in the office of the Health, Safety, Quality and Training (HSQT) Manager 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 Linfox Ingleburn Warehouse.

3 Procedure

3.1 Environmental Licence Details

Name of Licensee including ABN	Linfox Australia Pty Ltd
EPL Number	20097
Premises Name and Address	Linfox Australia Pty Ltd 4 Inglis Road, Ingleburn NSW 2565
Contact Details	Ingleburn (02) 8777 3500 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
Ryan Thew Linfox Distribution Centre Manager Contact: 0433 383 953 Email: ryan_thew@linfox.com Site based	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.
Antoniette Lindsay HSQT Manger Contact: 0437 426 428 Email: Antoniette.Lindsay@linfox.com Site based	PIRMP Activation – Notification to relevant Authorities Review and update PIRMP annually. Ensure all PIRMP training has been completed. Review the procedure annually or following a serious event. Submit Annual Returns Engage the EPA, relevant authorities
Glenn Darby National Manager Contact: 0402 058 390 Email: glenn_darby@linfox.com Site based	PIRMP Activation – Notification to relevant Authorities
Paul Haggerty Safety and Compliance Regional Manager – C&HG Contact: 0439 359 482 Email: paul_haggerty@linfox.com State-NSW based	Assist with the review of the procedure annually or following a serious event. Support the submission of Annual Returns Engage the EPA, relevant authorities if required
Michelle Muller-Cunha EMS Coordinator Contact: 0457 133 018 Email: Michelle.Muller-Cunha@linfox.com Melbourne based	Support the review of the PIRMP annually. Support the mitigation of any environmental impacts on site and facilitate liaison with the relevant environmental authorities.
Supervisors/Leading Hands Site based	Ensure the procedure is implemented Report any incidents immediately and escalate as per the PIRMP. Follow the directions of the Fire Warden.
Warden Site based	Carry out duty as per Emergency Response Plan and PIRMP
All Personnel Site based	Report any incidents immediately Follow this procedure Follow the directions of the 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
Campbelltown City Council	024 645 4000
Police	000
Ambulance	000

4.2 Notification to Neighbours and Local Community

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

- Direct communication by door knocking,
- 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 Linfox Logistics 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 the carrying out of 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.

- Designated cage for Class 2 Aerosol dangerous goods
 - In rack sprinkler system
- Bunded Warehouse – manually activated on alarm,
 - DG Cage
 - Forklift Battery Charging room
 - Forklift work area
- Weighted storm water drain covers
 - manually applied on alarm

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,
- 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 fast moving consumer goods as sold under the Unilever brands and raw materials used in the production of Unilever brands of ice cream. There are no bulk dangerous goods stored on the site.

The classes of dangerous goods store on site are:

- Class 2.1 Category 1 Aerosols (compressed commercial cylinders)
- Class 3 Category 2 Flammable liquids (commercial packages)
- Class 3 Category 3 Flammable liquids (raw material flavours and colourings)
- Class 3 Category 2 (Sub risk 8) Flammable Liquid, Corrosive (raw material flavours and colourings)
- Class 2.1 Category 1 Flammable gas

8 Safety Equipment

The Site has completed a risk assessment for:

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

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

- 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

Spill Emergency PIRP	
STEP	OPERATING INSTRUCTION
	If a spill occurs – STOP, CONTAIN, REPORT, CLEAN UP
	<div>       </div> <div> MUST BE WORN WARNING </div>
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.

- 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 with licensed Unilever approved waste collector,
- Incident reporting, follow:
 - LIN0023 Emergency Management
 - LIN0044 Incident Management

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

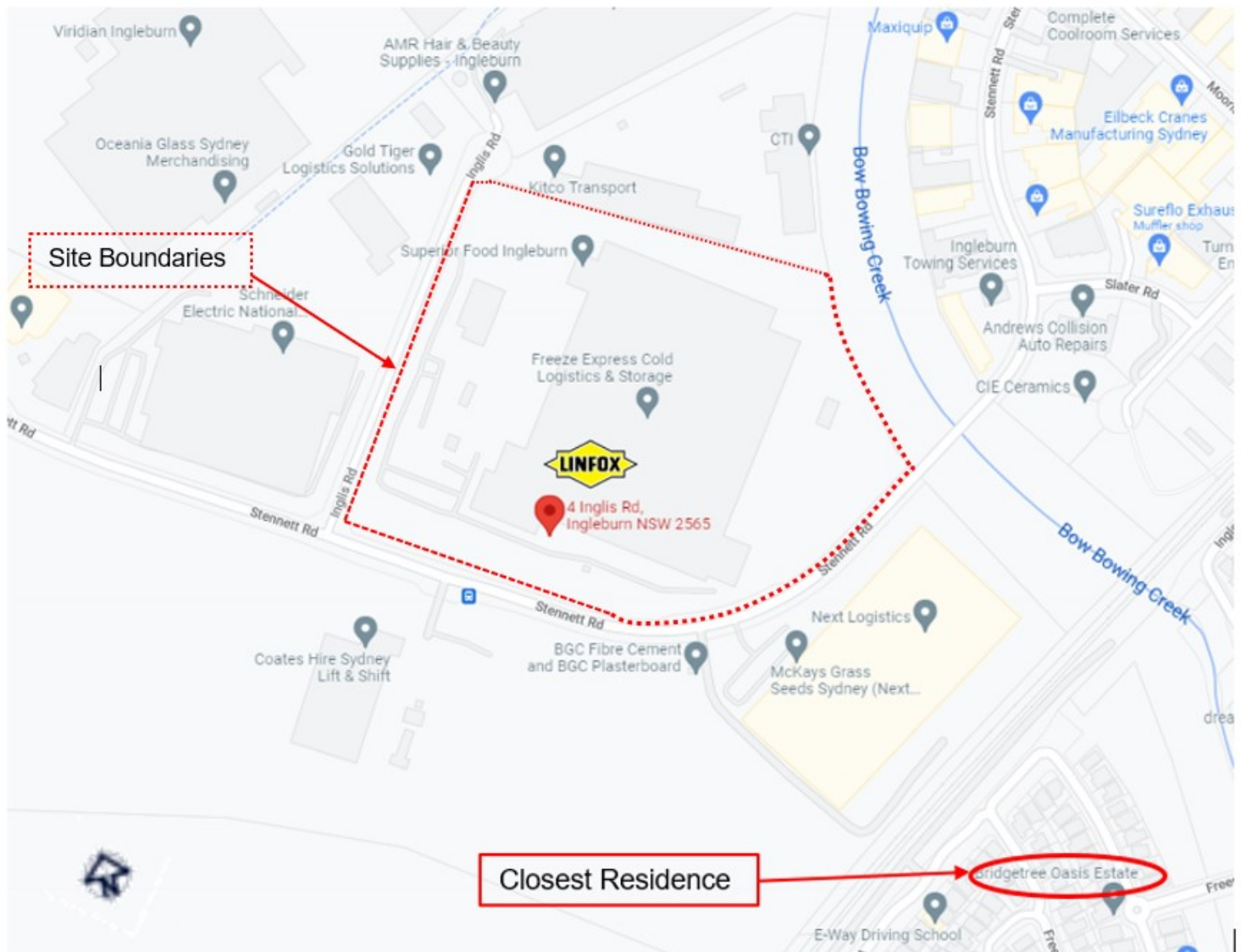
	Fire Emergency PIRP
STEP	OPERATING INSTRUCTION
	In the event of a fire:
1	Alert others in the area of the fire.
2	Move away from the fire affected area immediately.
3	Notify the nearest Warden.
4	Inform the Chief Warden of the situation.
5	If the Chief Warden deems necessary, the Evacuation Alarm will 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.

11 Staff Training

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

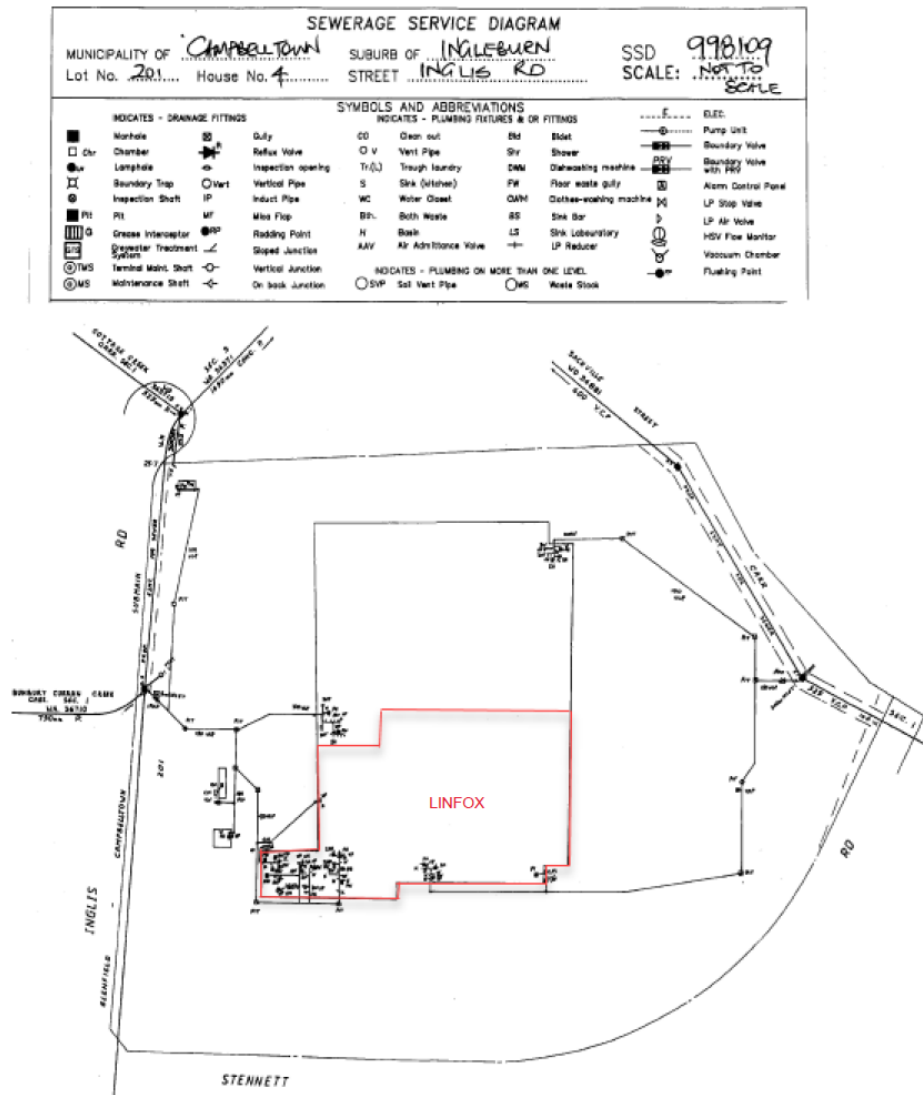
- Safe work Processes,
- Emergency Response Plan,
- Toolbox talks,
- Participation in annual drill (mock scenarios).

12 Maps



13 Drain Locations

Drains will be manually covered to contain any spills as per Emergency procedure. Below is an existing sewerage service diagram for the site.



Below are the Storm Water drain and Sewer Pit locations for the site.



14 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.

15 Appendices

Appendix 1: Checklist of potential environmental aspects and risks

ENVIRONMENTAL HAZARD IDENTIFICATION			
EXAMPLES OF POTENTIAL HAZARDS (INCOMPLETE LISTING)			
A	AIR CONTAMINANTS		
	Will the activity, equipment or process:	Examples	
1	Generate any gases, fumes, vapour?	Fuel storage, back-up generators,	
2	Generate particulate matter (PM) / dust / dust plume?	Generators, fume / dust extraction, combustion equipment	
3	Generate synthetic greenhouse gases (SGG)?	Air conditioning gases, chillers, refrigerators	
4	Generate any strong odour affecting nearby resident?	Ammonia leak (refrigerant)	
5	Other?		
B	RELEASE TO STORMWATER OR CREEK		
	Will the activity, equipment or process:		
1	Cause contamination of stormwater and/or creek?	Tank / bund overflow, spill & leakage, soil and sedimentation, detergents, litter, construction waste	
2	Any chance of overflow (tank / bund)?	Cleaning activity, filling process	
3	Any modification or change to stormwater system connection?	Cleaning activity, filling process	
4	Other		
C	RELEASE TO SEWER		
	Will the activity, equipment, or process:		
1	Any discharge into sewer? (liquid/sludge)	Trade waste, truck wash, pits	
2	Are any organic or hazardous chemicals discharged into sewer?	Oils, interceptor, grease traps	
3	Any modification or change to sewerage system connection?	Modification of pipework	
4	Generate new stream or change any discharge into sewer	pH, wastewater, truck wash	
D	RELEASE TO LAND; SOIL AND GROUNDWATER		
	Will the activity, equipment or process:		
1	Have any chance of chemical / oil spills or seepage onto roadway / ground / soil?	Transport, storage, operation, chemical handling	
2	Have any chance of overflow causing spill, onto roadway / ground / soil?	Fuel or oil spill, tanks, bund	

Appendix 1. Table continued:		
1.0	ENVIRONMENTAL HAZARD IDENTIFICATION - RISK ASSESSMENT AND RISK CONTROL	2.0
3	Have any trench, bund, sump, pits that hold waste water?	Bund, pits, trenches under servicing pits
4	Have any underground storage tank ?	Bund, pits, oils, fuels
5	Have any above ground storage tank ?	Bund, pits, fuel storage, Ad Blue storage, oils, etc
6	Have any chemical, fuel delivery process?	Fuel, oils, Ad Blue, solvents
E	Controlled WASTE GENERATION	
	Will the activity, equipment, or process:	
1	Generate any liquid waste that is controlled by regulations	Waste oil, chemical, oily waste, interceptor waste
2	Generate any solid waste that is controlled by regulations?	Chemical/oil drums, oily rags, oil filters, contaminated soil (construction), asbestos contaminated waste (construction)
3	Any chance of leakage / seepage / spill or wrong containment?	From waste generation, transportation, storage
4	Any chance of wrong disposal?	From waste labelling, storage, disposal process
5	Reportable priority waste? Controlled waste? (Waste tracker, or other environment authority waste tracking system)	Disposal of reportable priority waste and/or controlled waste off site (sludge, oil, etc)
F	CHEMICAL MANAGEMENT	
	Will the activity, equipment, or process:	
1	Have possibility of any chemical spills / leakage?	Through storage, delivery, transportation, usage, decanting
2	Use any dangerous / hazardous chemicals?	Oils, fuels, batteries, gases, solvents, paints, degreasers
3	Have any chemical storage or usage above 10L?	Fuels, solvents, other chemicals (e.g Ad Blue, or cleaning chemicals)
4	Generate any chemicals drums/packaging waste?	In situ drum usage or on site drum storage or IBC's
5	Generate any waste / by products that requires disposal?	Through usage
6	Have any bulk storage containment / underground tanks	Fuel tank, oil tank, Ad Blue
G	RESIDENT IMPACT:	
	Will the activity, equipment, or process:	
1	Generate noise outside building/s?	High pressure washing, soil excavation (construction), idling trucks or engines
2	Cause vibration?	Generator, construction

<i>Appendix 1. Table continued:</i>			
1.0	ENVIRONMENTAL HAZARD IDENTIFICATION - RISK ASSESSMENT AND RISK CONTROL		2.0
3	Generate odour / dust / fumes?	Chemical storage, construction	
4	Risk fire / explosion?	Chemical storage, gas storage, etc	
5	Cause weeds or attract pests?	Site management, soil management (construction)	
H	OTHER ENVIRONMENTAL HAZARD: DESCRIBE		
	Consider aspects arising from construction of new sites, plant modifications, projects, etc.		
	e.g., new construction projects		

16 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.

17 References

17.1 Legislation

- Linfox Ingleburn EPA Licence
- Environmentally Hazardous Chemicals Act 1985

17.2 Policies

- Linfox Sustainability Policy

17.3 Procedures

- LIN0034 Dangerous Goods and Hazardous Chemicals
- LIN0034C Storage of Dangerous Goods and Hazardous Chemicals
- LIN0023 Emergency Management
- LIN0044 Incident Management
-

17.4 Other documentation

- Ingleburn Manifest
- Site Employee Induction