

Moorebank

AEROSOL FILLERS

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 9-11 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 28, 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 Work Cover NSW dangerous goods on site are as follows.

Storage Type	UN No.	Description	Class	Qty
Above ground tank	UN 1978	Propane	2.1	21000L
Above ground tank	UN 1033	Dimethyl Ether	2.1	7000
Roofed Store	UN 1090	Acetone	3	15000L

(Flammable Goods Store)				
	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 & Appendix 6 for Site Manifest

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,

Business Name	Property Address	Contact Details
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.

Refer to Appendix 4 for Spill Kit Procedure.

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



9-11 Cunningham Street
Moorebank NSW 2170
PO Box 8
Moorebank NSW 1875
T 02 9601 7744
F 02 9601 6515
E sales@aerosolfillers.com.au
ABN 44 000 211 254

FACTORY
EMERGENCY EVACUATION
PROCEDURE

- 1. Once Emergency Evacuation Announcement is heard, follow evacuation immediately as instructed.
- 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
- 4. Roll caller to take Employee name list from point of exit.
- 5. Once outside 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 hotline as below, if needed.

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

Roll Callers:

Craig Achurch
Quan Dang
Excelyn Edwards
Lance Sulley

Appendix 4 – Spill Kit Procedure

SPILL STATION SPILL RESPONSE

- Wear appropriate Personal Protection Equipment (PPE) before contact with any hazardous substance (consult MDS)
- If it is safe to do so, shut off or block the source of the spill.
- Ensure that spills are prevented from entering stormwater and drainage systems, creeks, culverts or dams.
- If the spill is spreading or has occurred on sloped ground use Sukerup boom/s to contain the contaminated area.
- Tread down boom/s carefully to maximise contact area.
- For spills on water use loose Sukerup Organic or Sukerup hydrocarbon specific absorbent.
- Apply Sukerup Organic or Sukerup pads to the spills surface and allow time for the spill to be completely absorbed. If the liquid is especially viscous, work absorbent through with broom, brush or shovel.
- Once the spill has been completely absorbed, place used Sukerup in the Contaminated Waste bags provided and seal with the ties.
- Report spills and cleanup activities to the appropriate supervisor/manager.
- Restock Spill Station.

Spill Kit Contents:

Workplace Spill Kit 120lt	1 x PVC Gloves	
2 x Spilmax Natura-sorb Floor Sweep 10kg	2 x Disposal Bags & Ties	
2 x Spilmax Mini Booms (Dia75mm x 1.2ml)	Workplace Spill Kit 240lt	
1 x Spilmax Pillow (400mmx500mmx50mm)	3 x Spilmax Natura-sorb Floor Sweep 10kg	2 x PVC Gloves
25 x Spilmax Pads 400gsm (480mmx430mm)	3 x Spilmax Mini Booms (Dia75mm x 1.2ml)	50 x Spilmax Pads 400gsm (480mmx430mm)
5 x Spilmax Wipes 200gsm (500mmx400mm)	2 x Spilmax Pillow (400mmx500mmx50 mm)	10 x Spilmax Wipes 200gsm (500mmx400mm)

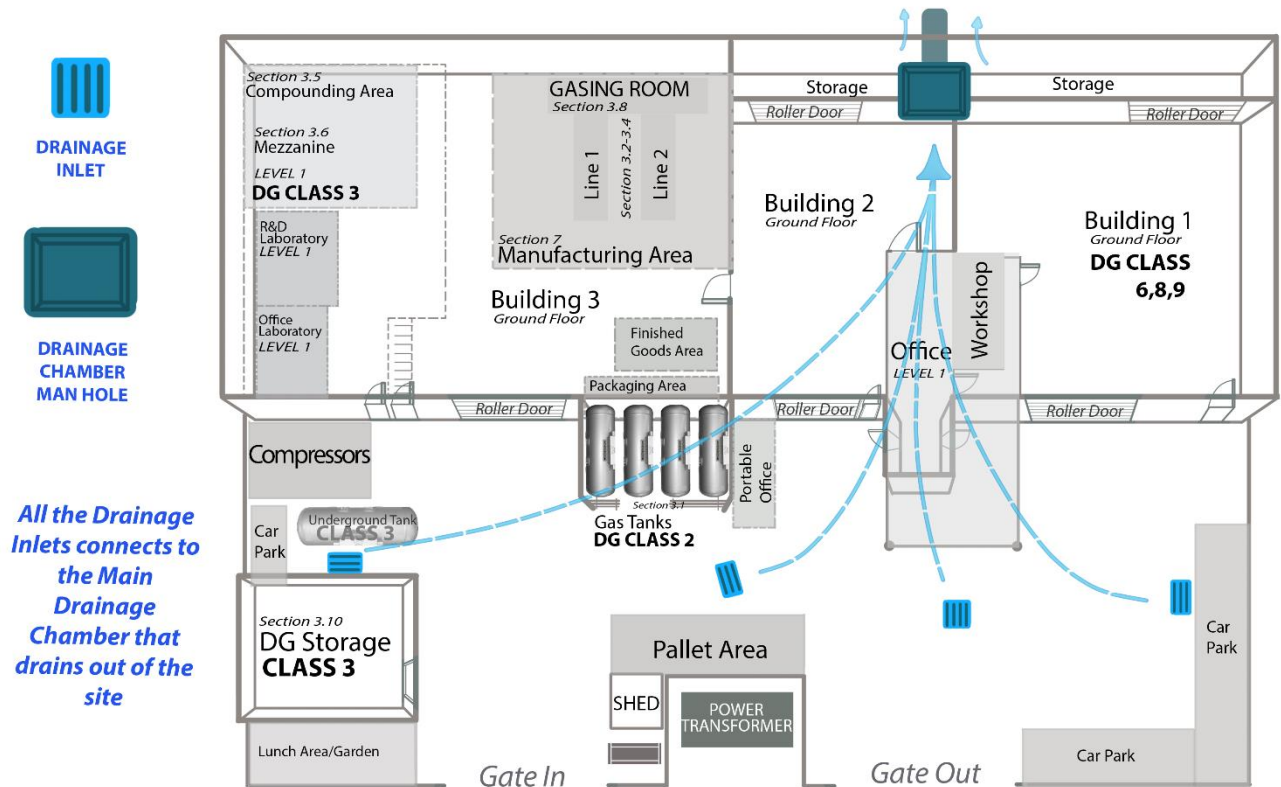
General Purpose 240lt	2 x PVC Gloves
200 x GP Absorbent Pad	1 x Spill Kit audit Tag
3 x GP Absorbent Boom 1.2m	1 x Laminated Instruction Sheet
2 x GP Absorbent Boom 3m	1 x Clear PVC Kit Cap
2 x GP Loose Absorbent 50L Bag	
10 x Contaminated Waste Bags	

Important

If a spill occurs that threatens or harms the environment, you must tell the EPA or your local council as soon as you can after you become aware of it.

Appendix 5 – Stormwater Drainage System

MOOREBANK AEROSOL SITE DRAINAGE MAP



Appendix 6 – Site Manifest (as attached)

Document History

Revision Date	Changes Made	Approved
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
24/08/2018	Updated	Michael Donovan
25/06/2020	Updated	Michael Donovan
18/01/2021	Updated	Michael Donovan
<u>02/09/2024</u> <u>Revision 7</u>	<u>Updated by vab</u>	<u>Michael Donovan</u>

APPENDIX 6

SITE MANIFEST