POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

MAJOR HAZARD FACILITY LICENSE NO. 20-31-54

TOLL NORTH PTY LTD

TRADING AS TOLL INDUSTRIALS – CHEMICAL SERVICES

616 GREAT WESTERN HIGHWAY

ARNDELL PARK NSW 2148

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Amendments List

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1 Reporting Pollution Incidents

Under New South Wales environmental laws, certain incidents must be immediately notified to various regulatory authorities. It is also a Toll requirement that all incidents are notified and recorded, however there are some that, likewise, require the immediate notification of certain senior managers.

This section details those incidents which must be notified and who they must be notified to.

1.1 Kinds of incidents to be notified

- Any pollution incident that occurs during an activity so that material harm to the environment is caused or threatened must be immediately notified.
- Pollution incident means an incident or set of circumstances during or because 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.
- Harm to the environment is material if:
  - it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - 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
  - 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.
- It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

1.2 Reporting to the relevant authority

Toll Employees (permanent and casual) and subcontractors	
On a Toll Premises	Must immediately report any pollution incident to a Toll Manager, if there is a potential for material harm.
In a public place	Must immediately report any pollution incident to a Toll Manager, if there is a potential for material harm.
On a non-Toll Premises	Must, immediately report any pollution incident to that entity's Management, if there is a potential for material harm. The incident must then be reported to a Toll Manager.
Site Visitors	
	Must immediately report any pollution incident to a Toll Manager, if there is a potential for material harm.
Contractors working on site	
	Must immediately report any pollution incident to a Toll Manager, if there is a potential for material harm.
Toll Management	
Informed of incidents on Toll Premises or in a public place.	Must call the emergency services on 000 if they are likely to be required and then immediately report any pollution incident to the relevant authorities (Refer to the table below) in the order listed if there is a potential for material harm.
Informed of incidents on a non-Toll Premises.	Must call the emergency services on 000 if they are likely to be required and then immediately report any pollution incident to that entity's Management as well as to the relevant authorities (Refer to the table below) in the order listed if there is a potential for material harm.

RELEVANT AUTHORITIES	
Authority	**Contact Number**
Emergency Services (NSW Police, Fire and Rescue, Ambulance)	Call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.
EPA	Environment Line – 131 555
Ministry of Health	Parramatta SW Public Health Unit (Sydney West AHS) 9840 3603 OR after hours on 8890 5555 (Westmead Hospital) – ask for Public Health Officer on call
SafeWork	13 10 50
Blacktown Council	Council Call Centre on 9839 6000
Fire and Rescue NSW	1300 729 579 – if they have not been called initially

- The following information must (where available) be reported:
  - the time, date, nature, duration and location of the incident

- the location of the place where pollution is occurring or is likely to occur
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- the circumstances in which the incident occurred, including the cause of the incident, if known
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- other information prescribed by the regulations

- Notification is required immediately after a pollution incident becomes known. Any information required that is not known at the time the incident is notified must be determined as soon as possible and provided to the relevant authorities when it becomes known.

1.3 Reporting internally

- Reportable Incidents are documented in HSE-13-PRO-ALD-ALL-001 Incident Management and Reporting.
- If the incident is reportable, the Manager who contacts the relevant authorities as outlined in section 1.2 will contact the MHF HSE Manager to advise details of the incident. The MHF HSE Manager will then contact the Regional Operations Manager, Industrials and State HSE Managers. The relevant Customer Service Representative(s) will be contacted if applicable.
- As soon as practicable after coordinating any immediate containment and remediation (but within 24 hours), the Manager notifying the incident, then enters details about the incident into the Toll Reporting and Compliance database – TRAC.

Name	Position	Contact Information
Aaron Pfieffer	NSW Operations Manager	Phone (02) 9852 9085 Mobile 0466 487 314
TBC	Operations Manager	Phone (02) 9852 2620 Mobile 0439 244 474
Raj Chetty	Administration Manager	Phone (02) 9852 9075 Mobile 0428 552 699
Michael Baines	National Environment Manager	Mobile: 0488 189 884
Karen Baker	HSE Manager	Mobile: 0414 152 160

2 Hazards Arising from the Scheduled Activity

2.1 Description and likelihood of hazards associated with the activity

- The site is a warehouse and freight forwarding operation with a high volume of heavy vehicle and forklift traffic. In addition, a significant amount of chemicals are stored on site.
- The main hazards associated with the activities conducted at the site with potential to affect human health or have environmental impacts are:

Hazard	Likelihood	Factors increasing likelihood
Emissions to air - Flammable gas leaks - Toxic gas leaks	VERY LOW	Operations on site Unauthorised personnel on site
Emissions to soil or water from spilt material	LOW	Operations on site Unauthorised persons on site
Warehouse fire	VERY LOW	Unauthorised persons on site Arson/vandalism
Noise from operations	VERY LOW	Operations on site
Dust from operations	VERY LOW	Operations on site Wind
Flooding and release of water/contaminants through stormwater or internal stormwater to receiving waterways.	LOW	Climate Change Rain event Poor maintenance of drainage

2.2 Conditions giving rise to the hazard

- The facility is licenced for two activities under Environmental Protection Licence (EPL) 6152. The two permitted activities are “Chemical Storage” and “Waste Storage”.
- The facility is also licenced under the Environmentally Hazardous Chemicals Act for the storage of PCB’s.
- Most classes of Dangerous Goods are routinely stored on site as well as a diverse range of waste materials and Hazardous Substances.

Material	Hazard	Condition giving rise to the hazard
Flammable Materials	Fire	Introduction of ignition source into flammable goods store. Large leak within the flammable goods store creating a vapour cloud that escapes the confines of the store and contacts an ignition source. Leak or spill of flammable material outside of the store and subsequent contact with an ignition source.
Flammable Materials	Toxic Emissions	Copious smoke generated by a low temperature, slow burning fire retarded (but not extinguished) by sprinkler system. Toxic combustion products contained within firefighting media run-off.
Oxidising Agents & Organic Peroxides	Fire / explosion	Run-away chemical reaction resulting from hazardous interaction Self-accelerating decomposition Impact / shock Heat / exposure to sunlight
Corrosives	Fire / Explosion	Exothermic interaction resulting from a spill or leak Exothermic interaction resulting from incorrect segregation

Corrosives	Toxic Emissions	Copious smoke generated by a low temperature, slow burning fire retarded (but not extinguished) by sprinkler system Toxic combustion products contained within firefighting media run-off
Toxics	Fire	Fire spreading into toxics store from other areas Ignition of combustible material (e.g. pallets or packaging) within the toxics store
Toxics	Toxic Emissions	Hazardous interaction resulting from a spill or leak that liberates toxic gases Toxic smoke generated by a low temperature, slow burning fire retarded (but not extinguished) by sprinkler system Toxic combustion products contained within firefighting media run-off Rupture of toxic gas cylinders as a result of an overpressure detonation of compressed flammable gases or organic peroxides Rupture of toxic gas cylinders as a result of vehicular impact Loss of containment of solids or liquids from dropped or damaged containers onto soil
Gases	Asphyxiation	Large release of gases in poorly ventilated areas and confined spaces Large release of 'heavier than air' gases that collect at ground level
Gases	Freeze burns	High pressure gas escaping containment can become very cold, causing cold burns

- Given the large variety of materials associated with the relevant activity, there is not one set of hazards posed to human health and the environment. The hazards posed will differ with each material or similar group of materials.

2.3 Pre-emptive action and control measures

Pre-emptive measures to minimise or prevent any risk of harm to human health or the environment arising out of the operations include:

- Maintain fencing and access controls to prevent unauthorised access.
- Ensure adequate warning signage at perimeter premises and on site.
- If unauthorised persons are found on site, work is stopped and persons removed from the site.
- Ensure all personnel are inducted onto the site.
- Required protective clothing to be worn at all times.
- All operators of MHE to be suitably licenced and trained.
- Personnel shall maintain a 30m exclusion zone around the operating straddle crane.
- Chemicals are kept segregated from incompatible materials and housed in their designated stores.
- Operators are trained in chemical awareness, safe handling and storage.

3 Immediate Actions Following a Pollution Incident

3.1 Emissions to air – flammable gas leaks

- Person Discovering/Involved in a flammable gas leak
  - Anyone finding or involved in a flammable gas leak should

    i. Assist any personnel who are in danger or injured if it is safe to do so

    ii. Sound the alarm and alert other personnel in the vicinity

    iii. Notify the Area Warden
- Area Warden
  - The area must be cleared of all non-trained personnel and the situation assessed. The emergency services must be contacted immediately as per the site evacuation procedures and all personnel evacuated.
- Emergency Response Team
  - If the gas leak involves flammable gas and a fire exists, do not attempt to extinguish the flame unless the leak can be promptly shut off. Allow the gas to burn and keep the tank cool with water, especially pipework and any parts exposed to extreme heat along with upper portions where there is vapour but no liquid.
  - An explosion risk exists if:

    i. The relief valves are blowing and the fire, despite efforts to contain it, is gaining in intensity

    ii. The barrel of the tank is directly exposed to flame and the tank is liable to rupture due to the metal weakening through overheating

    iii. The pressure gauge shows a reading greater than the blow off setting of the relief valve
- Emergency Response Coordinator (Chief Warden, Fire and Rescue or HazMat etc.)
  - If there is a risk of an explosion / possible BLEVE, all personnel must be removed completely offsite, the emergency services called and the surrounding area notified immediately and told to evacuate.

- On arrival of Emergency Services, provide all relevant information as to the product and location on site of the incident.
- If the product involved is customer freight, then the customer must be advised of the situation as expert knowledge may be available as to the nature and risks associated with the product.

- All reports both internal and external must be completed.

3.2 Emissions to air – toxic gas leak

- Person Discovering/Involved in a toxic gas leak
  - Anyone finding or involved in a toxic gas leak should

    i. Assist any personnel who are in danger or injured if it is safe to do so

    ii. Sound the alarm and alert other personnel in the vicinity

    iii. Notify the Area Warden
- Area Warden
  - Full evacuation procedures must be actioned (as per the branch fire evacuation procedures) and all Emergency Services notified. Keep all personnel upwind from any leak.
- Emergency Response Team

Full self-contained breathing apparatus is needed as a minimum around any leak or spills. Depending on the products involved, other PPE may be required. Water spray is extremely effective in absorbing many poisonous gases and as general rule should be used around leaks of gases. Refer to the relevant MSDS to confirm there will be no hazardous interactions and ensure the site containment systems are activated to prevent run off.

If the gas leak also involves flammable gas and a fire exists, a judgement call needs to be made as to whether the fire risk or the flammable vapour risk is the greater threat. If the vapour risk is greater, do not attempt to extinguish the flame unless the leak can be promptly shut off. Allow the gas to burn and keep the tank cool with water, especially pipework and any parts exposed to extreme heat along with upper portions where there is vapour but no liquid.

- An explosion risk exists if:

  i. The relief valves are blowing and the fire, despite efforts to contain it, is gaining in intensity

  ii. The barrel of the tank is directly exposed to flame and the tank is liable to rupture due to the metal weakening through overheating

  iii. The pressure gauge shows a reading greater than the blow off setting of the relief valve
- Emergency Response Coordinator (Chief Warden, Fire and Rescue or HazMat etc.)
- With incidents involving Toxic Gas, normal evacuation points may not be satisfactory and guidance by distances listed in the Initial Emergency Response Guide (HB76) or the applicable Material Safety Data Sheet (MSDS) needs to be followed.
- Call the emergency services immediately.
- The surrounding area must be notified immediately and told to evacuate.
- On arrival of Emergency Services, provide all relevant information as to the product and location on site of the incident.
- If the product involved is customer freight, then the customer must be advised of the situation as expert knowledge may be available as to the nature and risks associated with the product.

- All reports both internal and external must be completed.

3.3 Emissions to soil or water (solid and liquid spills)

- Person Discovering/Involved in a spill
  - Anyone finding a chemical leak or spill should

    i. Assist any personnel who are in danger or injured if it is safe to do so

    ii. Sound the alarm and alert other personnel in the vicinity

    iii. Notify the Area Warden
- Area Warden
  - The area must be cleared of all non-trained personnel and the situation assessed. If a risk of fire, explosion or injury to personnel exists, then emergency services must be contacted immediately as per the branch evacuation procedures and all personnel evacuated.
- Emergency Response Team
  - Trained staff should prepare to contain the substance or stop the leak – if it is safe to do so.
  - If the spill is outside of, breaches or threatens to breach a bund, the retention pond is equipped with a sluice gate, which is closed at all times, to contain the spills going beyond the warehouse bunds.
  - Ensuring all safety wear and equipment is worn, personnel working in this type of response should at all times, work in pairs to ensure their safety and be accompanied by an observer.
  - Remember, before attempting to enter a spill area you should be fully conversant with the hazards relating to the product. This information can be gained from the Safety Data Sheets (SDS's) held at the depot. All substances on site have SDS's available from ChemWatch (accessed via the Toll infonet).
  - To contain the spill, place absorbent material around the spill to form a bund. You may need to use sand or spill control supplies to spread over the area to soak remaining product.
  - Do not walk in spilt product when attempting to contain.
  - Once product has been contained, place all contaminated sand and material in secure receptacle for disposal at licensed waste disposal site. Ensure that receptacles used are marked and placarded regarding their contents.
  - The damaged drum or package should be placed in a recovery container to avoid further leakage and the recovery container marked as per the contents along with all necessary dangerous goods marking and labels. E.g., UN Number, Product Name and Class Label.
  - On completion of clean up, all equipment and safety wear worn must be thoroughly cleaned or disposed of as hazardous waste. All contaminated equipment must be disposed of in the correct manner and replaced with new equipment.
- Emergency Response Coordinator (Chief Warden, Fire and Rescue or HazMat etc.)
  - All reports both internal (via the TRAC) and external must be completed.
  - Customers must be notified.
  - A full stock take of all emergency equipment is to be taken and items used, replaced.
  - The damaged goods must be removed from the area and placed into the Decontamination Holding Area. After any incident and before employees are allowed to enter any area where an incident has occurred, a thorough safety check should be carried out to ensure the area is safe and clear of any contamination.
  - Declare the emergency over.

4 Pollutant Identification

4.1 Pollutant inventory and location

- Due to the nature of site operations, the possible pollutants that are on site change continuously. The site Emergency Manifest contains a complete list of the general types, classes and maximum and typical quantities held as well as their location on site.
- A complete list of every material on site is produced weekly and held with the manifest to provide an updated snapshot of likely quantities on a weekly basis. This list can be produced at any time as needed by incident responders and emergency services.

4.2 Pollutant locations

- The site maintains an Emergency Manifest that is kept in hard copy at both emergency services entry points as well as being held in the main site office. This document provides detailed information on the location of chemical storage locations and the materials held at each location.

4.3 Engineering control measures

- Engineering controls at the site consist of an Emergency Warning and Intercommunications System, Fire Control System, a retention pond with a closed sluice gate as well as various monitors and alarms and an extensive CCTV system with 24 hours, back to base monitoring. These engineering controls are described in detail in the site Emergency Plan.

4.4 Safety and protective equipment

- The facility maintains an in-house, Emergency Response Team (ERT) room that is equipped with emergency response equipment suitable for responding to a vast range of hazardous material and pollution events.
- A group of employees make up the ERT, they are trained in the use of self-contained breathing apparatus, chemical protective clothing and hazmat response PPE & equipment. Regular training sessions are conducted.

5 Map

Location of Toll Depot

6 Training

6.1 Site induction

The Operations Manager is responsible for ensuring that prior to work being undertaken at the site, all personnel entering the facility receive a site induction.

The purpose of the Induction is to ensure that all personnel entering the site are aware of the hazards and control measures within the site. The Induction is valid for two years for employees & one year for Contractors. Significant changes to the induction content, may lead to it being reset within the validity period, to ensure that anyone working on site is aware of the current site operations. The Administration Manager shall ensure a register is maintained of all persons Inducted into the facility.

6.2 Training of operational staff

The TNA has been developed for all positions. Additional training required for specific positions has also been identified in the training profiles for employees. Employees should only undertake tasks for which they have received appropriate training or accreditation or have been deemed competent under Toll's systems.

Employees required to operate plant and equipment shall be appropriately qualified, competent, licensed or trained to operate the item of plant or equipment safely and competently. Employees required to handle or transport chemicals shall receive training appropriate to their position and role responsibilities.

A record of appropriate qualifications, training and licences is kept by the Administration Manager.

7 Maintenance and Availability of the Plan

The plan shall be tested and reviewed for updating, routinely at least once every 12 months. This testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner.

This plan shall be routinely tested by:

- Conducting an incident response and evaluation drill at the site based on a possible incident scenario.
- Simulating the communications process required as part of the incident response, including the roles of employees off site.

A written evaluation of these tests shall be undertaken, and records of these evaluations shall be retained by the MHF HSE Manager.

A printed copy of the current version of this plan is available at the administration office.