Emergency & Pollution Incident Response Plan

DGL Pty Ltd

11 Boden Road
Seven Hills NSW 2147

GPS Location:
Latitude: -33.773715
Longitude: 150.958516

22 July 2025

Summary of Dangerous Goods Held at the Premises

Hazardous Chemicals Stored in Tanks:

Storage Area	Proper Shipping Name	UN No.	Class / Division	PG	Type	Design Capacity	Typical Capacity
100	Hydrochloric Acid	1789	8	II	Above Ground Tank	25,000 L	20,000 L
104	Hydrochloric Acid	1789	8	II	Above Ground Tank	25,000 L	20,000 L
108	Hydrochloric Acid	1789	8	II	Above Ground Tank	25,000 L	20,000 L
165	Aluminium Chloride Solution	2581	8	III	Above Ground Tank	25,000 L	20,000 L
142	Aluminium Chloride Solution	2581	8	III	Above Ground Tank	11,500 L	10,000 L
200	Sulphuric Acid	1830	8	II	Above Ground Tank	18,000 L	15,000 L
209	Sulphuric Acid	1830	8	II	Above Ground Tank	18,000 L	18,000 L

Hazardous Chemicals Stored in Containers:

Storage Area	Proper Shipping Name	UN No.	Class / Division	PG	Type	Design Capacity	Typical Capacity
WB 1	Formic Acid	1779	8	II	Tank- IBC	65,000 L	50,000 L
WB 2	Hydrochloric Acid	1789	8	II	Tank- IBC	3000 L	2000 L
WB 3	Sulphuric Acid	1830	8	II	Tank- IBC	8000 L	5000 L
WB 4	Polyaluminium Chloride, 30% Basic (Pac 30b)	1760	8	III	Tank- IBC	3000 L	2000 L
WB 5	Polyaluminium Chloride 10% (Pac-Pw)	2581	8	III	Tank- IBC	3000 L	2000 L
WB 6	Sodium Hydroxide Solution 50%	1824	8	II	Tank- IBC	5000 L	2000 L
WB 8	Hydrogen Peroxide Aqueous Solution 50%	2014	5.1	II	Tank- IBC	2000 L	2000 L
WB 9	Hypochlorite Solution 12.5%	1791	8	III	Tank- IBC	2000 L	1000 L
WB 10	Aluminium Chloride Solution	2581	8	III	Tank- IBC	5000 L	3000 L
WB 11	Ferric Chloride Solution	2582	8	II	Tank- IBC	4000 L	3000 L
MS 7	Liquefied Petroleum Gas (LPG)	1075	2.1	N/A	Cylinders	300 L	240 L

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1 Emergency Services Information Package

1.1. Fire Fighters' Summary

Site location:
DGL Pty Ltd: 11 Boden Road, Seven Hills NSW 2147
Brief description of works:

- DGL produces chemicals such as coagulants and flocculants for drinking water, chemicals for the mining industry and concrete additives.
- Class 8 corrosives include hydrochloric acid, sulfuric acid, aluminium chloride solution and formic acid. These are stored in a bunded area within above ground tanks and within as per site manifest.
- The site has placarding quantities of Class 5.1 dangerous goods kept in as per site manifest. There are also minor quantities of Class 2.1 and Class 2.2 stored as shown on the site map.
- Final products are stored in storage tanks.

Wash-down and wastewater from the process is treated in the on-site wastewater treatment plant in Warehouse A. The treated wastewater is then transferred to two above ground tanks located on the eastern side of the warehouse. The contents of these tanks are currently directed to the Sydney Tradewaste System for treatment.

The site has first flush stormwater protection and a stormwater isolation valve located on the north boundary of the site as indicated. See updated site map.

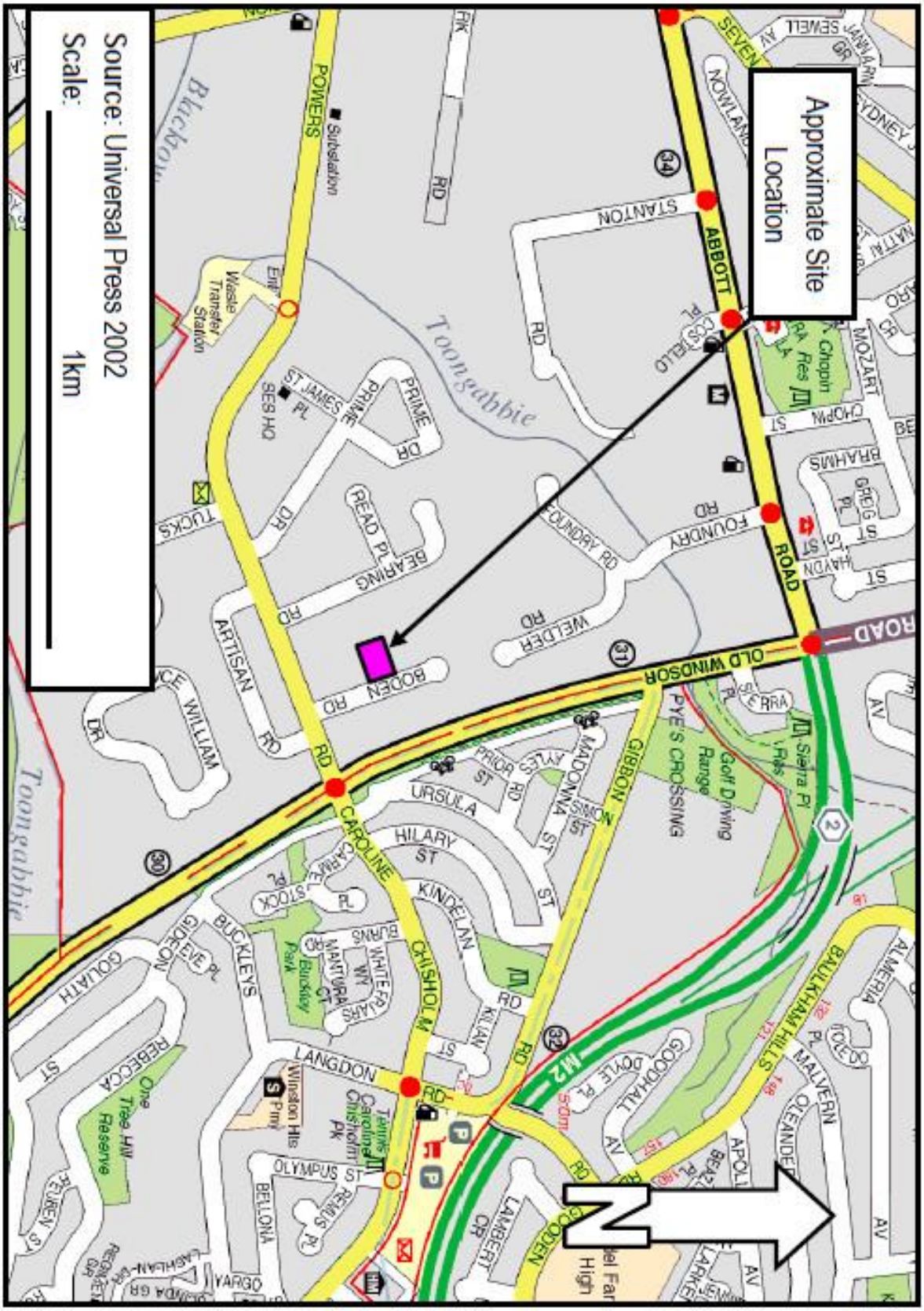
The site has a 100,000L (Pool 1) stormwater protection detention tank and 20,000L underground pit (Pool 3). See updated site map.
The fire services on-site include:

- Hydrants
- Hose reels
- Fire Extinguishers

Dangerous goods classes are stored as indicated. See site manifest. A chemical register detailing the chemicals stored within each of the areas provided in the small red box on electricity supply mains room the front of the site.

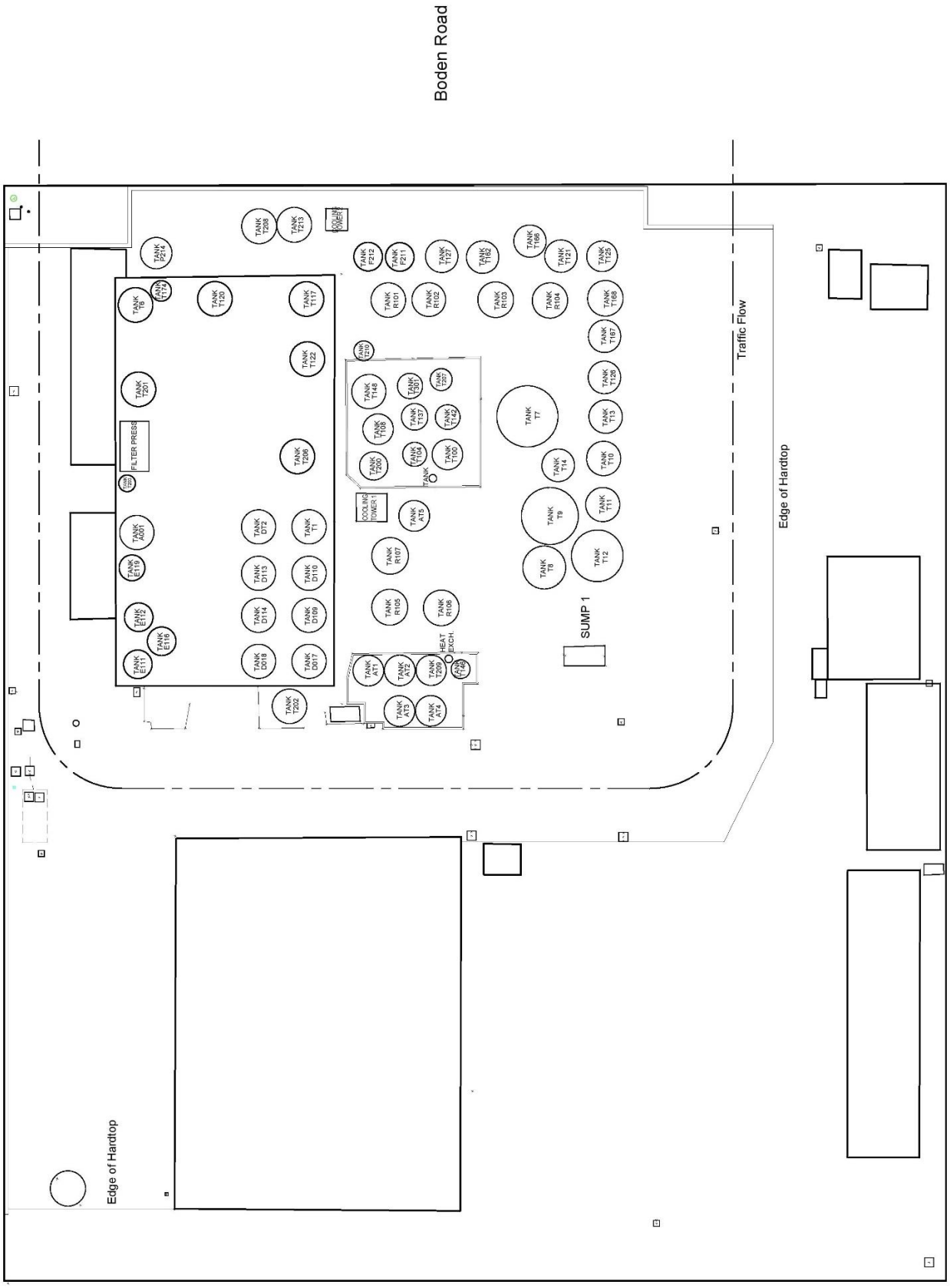
Head of Emergency Control Organisation: Sean Bryden 0414 655 264

1.2. Site Location



1.3. Site Layout 1: Aerial View

1.4. Site Map / Plan



2 Abbreviations & Glossary Of Terms

Council	Blacktown City Council
Chief Warden	Director of Operations or Delegate to a Responsible Person
Emergency Assembly Area	This is a safe location to which all people are required to assemble in the case of an emergency.
ERP	Emergency Response Plan
HAZCHEM Code	An alpha-numeric code place on hazardous chemical placards to indicate actions to be taken by emergency services to control an incident involving the chemical, prior to detailed technical information being available.
SDS	Safety Data Sheet. A sheet giving detailed information regarding the hazardous characteristics of a substance and procedures to be followed in the event of an emergency involving the substances.
NFPA	National Fire Protection Association. A US-based organization promoting fire safety and protection. NFPA Codes of Practice are commonly used in Australia for situations not covered by Australian Standards and Regulations or Codes of Practice.
EPA	Environmental Protection Authority
PG	Packing Group: used to rank the hazard associated with the transport and handling of a particular dangerous goods (except for Dangerous Goods Class 1,2 and 7)
Pollution Incident	The *Environmental Guidelines: Preparation of pollution incident response management plans* defines a pollution incident as: "…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.
PPE	Personal Protection Equipment
Pre-emptive action	Actions taken as a measure against possible or anticipated harm such as use of spill containment kits, installation of storm-water cut-off valves and installation of fire-containment water tanks
Prevention of pollution	Use of processes, practices, materials, or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. Note: The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs
UN No	United Nations Hazardous Material Identification Number. A four-digit number used to identify a hazardous chemical.

3 Introduction

This Emergency and Pollution Incident Response Management Plan has been prepared for the operation of a chemical processing plant by DGL Pty Ltd at 11 Boden Road, Seven Hills which, for the purpose of this report, will be known as the 'Boden Road Facility or Site' from here onwards.

All personnel and contractors working at the Site should be made aware of the general contents of this document and accompanying procedures.

It is a requirement that all those employees responsible for emergency response activities, as defined by this plan, have a copy of the plan, and receive the appropriate level of training needed to ensure the effective implementation of the respective emergency response procedures identified in this document.

3.1. Reference Documents

This plan has been developed in accordance with the following guidance documents and relevant Australian/New Zealand Standards:

- Hazardous Industry Planning Advisory Paper (HIPAP) No.1 – Emergency Planning (NSW Department Planning) January 2011;
- Work Health and Safety Act 2011 and relevant Regulations (NSW Legislation);
- SAA/SNZ HB76:2004 Dangerous Goods - Initial Emergency Response Guide (Standards Australia) 2004;
- Policy No. 1: Guidelines for Emergency Plans at Facilities Having Dangerous Goods, Explosives and Major Hazard Facilities, 2010(State Government of NSW (NSWFB));
- AS 3745-2010 Planning for emergencies in facilities (Standards Australia);
- NSW Fire & Rescue Guidelines;
- Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2022 (NSW Legislation);
- Protection of the Environment Operations Act,1997 (NSW Legislation); and
- Environmental Guidelines: Preparation of Pollution Incident Response Plans (NSW EPA).

3.2. Definition Of An Emergency

The plan is designed to cover all emergency conditions that could be reasonably anticipated at the Site.

An emergency situation can be defined as any abnormal or dangerous event that may adversely affect the safety or wellbeing of nearby persons, communities or the environment. Under these circumstances, the occupants of the said premises are called to immediately respond to the emergency situation in an effort to control, correct and return the dangerous situation to a safe condition.

If there is any doubt, an event should be treated as an emergency and the procedures stipulated by this plan should be followed. Note that all fires are to be treated as emergencies.

The three levels of emergency are defined as:

- **LOCAL ALERT**: Any emergency situation that threatens human lives, property or the environment at one location of the Site but is not likely to spread to other areas of the Site or the property.

- **SITE ALERT**: Any emergency situation where its effects may spread to other areas on the Site.

- **EXTERNAL ALERT**: Any emergency situation where its effects may spread and impact on people, property or the environment outside the Site's site boundaries, such as a grass fire.

  Each of these three levels of emergency may be further classified as follows:

- **MINOR EMERGENCY**: An emergency situation that can be handled entirely by the Site's emergency response personnel without the assistance of the respective public emergency services; and

- **MAJOR EMERGENCY**: An emergency situation that requires the assistance of the public emergency services i.e. ambulance, fire brigade or police services.

  An **EXTERNAL ALERT** is automatically a **MAJOR EMERGENCY**, as action cannot be taken outside the site boundary independently of the public emergency services.

3.3. Definition Of A Pollution Incident

The Environmental Guidelines: Preparation of pollution incident response management plans (NSW EPA) defines a pollution incident as:

> "…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."

Under the Section 148 of the POEO Act, pollution incidents causing or threatening material harm to the environment must be notified immediately to the relevant authorities.

"Material risk of harm to the environment" is defined under Section 147 of the POEO Act as:

(a) *harm to the environment is material if:*
  (i) *It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
  (ii) *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*

(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.*

3.4. Pollution Incident Response Management

The Protection of the Environment Operations (General) Regulation 2022 came into force on 1 September 2022. It is an important part of the framework that requires industry and licensees to operate in environmentally responsible ways throughout NSW. A new requirement under Part 5.7A of the POEO Act imposes an obligation on holders of environmental protection licences to prepare and implement a pollution incident response management plan (PIRMP) for each licensed activity.

DGL Pty Ltd hold an environmental protection licence EPL No. 141 under the POEO Act for Chemical production waste generation as well as Dangerous goods production on their site located at 11 BODEN ROAD, SEVEN HILLS, NSW, 2147

Requirements for pollution incident response management plans are stipulated in the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2022 and Part 5.7A of the POEO Act. Part 5.7A of the POEO Act specifies:

- Information to be included in the plan (Clause 153C) including the procedures to be followed in notifying a pollution incident to the relevant people and authorities, a detailed description of action to be taken immediately after a pollution incident to reduce or control any pollution and procedures to be followed.
- The plan must be kept at the premises to which the relevant environmental protection licence (EPL) relates (Clause 153D).
- Licensees must test the plan in accordance with Clause 98E of the Regulation (Clause 153E).
- Licensees must immediately implement the plan if a pollution incident occurs during an activity so that no material harm to the environment is caused (Clause 153F).

Under Clause 98B (2) of the regulation, a licensee who already has a plan in place is not necessarily required to prepare a new or separate plan under these legislative changes. Section 98C of the regulation specifies matters to be included in pollution incident response management plans. The majority of these matters were already included in an earlier version of this plan. Amendments have been made to this plan to satisfy the requirements under Section 98C of the Regulation. These requirements are detailed in the following table.

Table 3-1: Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2022		
No.	**Requirement**	**Section**
(a)	*a description of the hazards to human health or the environment associated with the activity to which the license relates (the relevant activity).*	2.2
(b)	*the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood.*	2.2.4
(c)	*details of the pre-emptive action to be taken to minimize or prevent any risk of harm to human health or the environment arising out of the relevant activity.*	2.3
(d)	*an inventory of potential pollutants on the premises or used in carrying out the relevant activity.*	2.2.1 & 2.2.3
(e)	*the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the license relates.*	2.2.3
(f)	*a description of the safety equipment or other devices that are used to minimize the risks to human health or the environment and to contain or control a pollution incident.*	2.3
(g)	*the names, positions and 24-hour contact details of those key individuals who:* *(i) are responsible for activating the plan, and* *(ii) are authorized to notify relevant authorities under section 148 of the Act, and* *(iii) are responsible for managing the response to a pollution incident.*	4.7.4
(h)	*the contact details of each relevant authority referred to in section 148 of the Act.*	4.7.5
(i)	*details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the license relates or where the scheduled activity is carried on.*	4.7.6 & Attachment 4
(j)	*the arrangements for minimizing the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on.*	2.2.4
(k)	*a detailed map (or set of maps) showing the location of the premises to which the license relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.*	Emergency Services Information Package
(l)	*a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates, and the action to be taken during or immediately after a pollution incident to reduce that risk.*	4
(m)	*the nature and objectives of any staff training program in relation to the plan.*	4.10
(n)	*the dates on which the plan has been tested and the name of the person who carried out the test.*	4.11
(o)	*the dates on which the plan is updated.*	4.11
(p)	*the manner in which the plan is to be tested and maintained.*	4.11

The NSW EPA has also prepared Environmental Guidelines: Preparation of Pollution Incident Response Plans. This Pollution Incident Response Management Plan has been prepared in accordance with the POEO Act, Regulation and the guidelines. Requirements included are:

- A description and likelihood of hazards to human health and the environment associated with the licensed activity;
- Pre-emptive actions to be taken to minimise risk of harm;
- An inventory of potential pollutants;
- A description of safety equipment and devices used to minimise risks and/or contain a pollution incident;
- 24-hour details of key site contacts and relevant authorities;
- Mechanisms used to provide early warnings to neighbours and the local community;
- Actions to minimise risk of harm should an incident occur;
- Actions to be taken during or immediately following a pollution incident;
- A detailed set of plans; and
- Staff training programs relating to implementing the plan.

3.5. Aims Of Emergency & Pollution Incident Response Management Plan

The aims of this plan are the following:

- Provide a clear understanding of how to handle and react to any emergency situation that may occur at the Site in the form of effective control structures, procedures and directives;
- Prevent or minimise the impact of an emergency on human life, the community and surrounding environment; and
- Facilitate a return to normal or safe operations as soon as possible.

The procedures contained in this document have been designed to protect life and where possible prevent or minimise damage to the equipment, Site and installations at the Site and facilitate a return to normal operations by providing effective utilisation of the safety features, systems and equipment installed at the Site to protect people from fire and other emergencies.

3.6. Scope & Objectives

This plan applies to all equipment, installations, personnel and visitors under the control or management of DGL whilst working or visiting the Site.

This document contains information and instructions that provide a basis for handling various types of emergency situations, such as a fire, explosion, medical emergency, spills, gas-leaks, and bomb threats. These instructions should not be regarded as rigid procedures to be followed, but rather as continually improving guidelines to be adapted to cope with unanticipated situations. The objectives of this plan are the following:

- To protect human life and facilitate the rescue or evacuation of personnel affected by the emergency situation;
- To control or limit any effect that an emergency situation may have on the Site or on neighbouring areas;
- To facilitate emergency response and to provide such assistance as is appropriate to the occasion;
- To ensure the quick and effective communication of all vital information to respective authorities;
- To facilitate the organisation and reconstruction activities so that normal operations can be resumed as soon as possible;
- To provide for emergency response training so that a high level of preparedness can be maintained at the Facility;
- To provide the structure under which Emergency Response Procedures are revised and updated;
- To ensure timely and comprehensive communication of a pollution incident to staff, relevant authorities and all other stakeholders affected by the impacts of the pollution incident; and
- To identify risks and develop actions to minimise and manage these risks.

4 Summary Of Operations, Hazards & Safety Systems

4.1. Summary Of Operations

The Site is located at 11 Boden Road, Seven Hills. The Site is owned by DGL who uses the site for chemical storage and processing. Refer to Figure 4-1 for a location map of the site.

The site consists of storage tanks and processing/batching infrastructure, associated transfer infrastructure and buildings and access driveways. The details of the site are given in Table 4-1.

Table 4-1: Site Details

Area	Storage Details
Warehouse A	Empty IBC's, drums, cubes, Powder blenders, workshop, wastewater treatment plant, Multifloc 5084 and Multifloc A1400 2% (polymer solutions) process tanks.
Warehouse B	Finished product and raw material IBC's, drums, cubes, other raw materials such as Aluminium, polymer powders, lime etc.
Store	Workshop / R & M supplies
Offices/ Lab	Employees, desks, computers, filing cabinets, server
Above ground DG tanks	DG products and DG raw materials
External DG Store	MS 1 to MS 7, refer to site plan.
External Store	Workshop / R & M supplies

Figure 4-1: Site Location

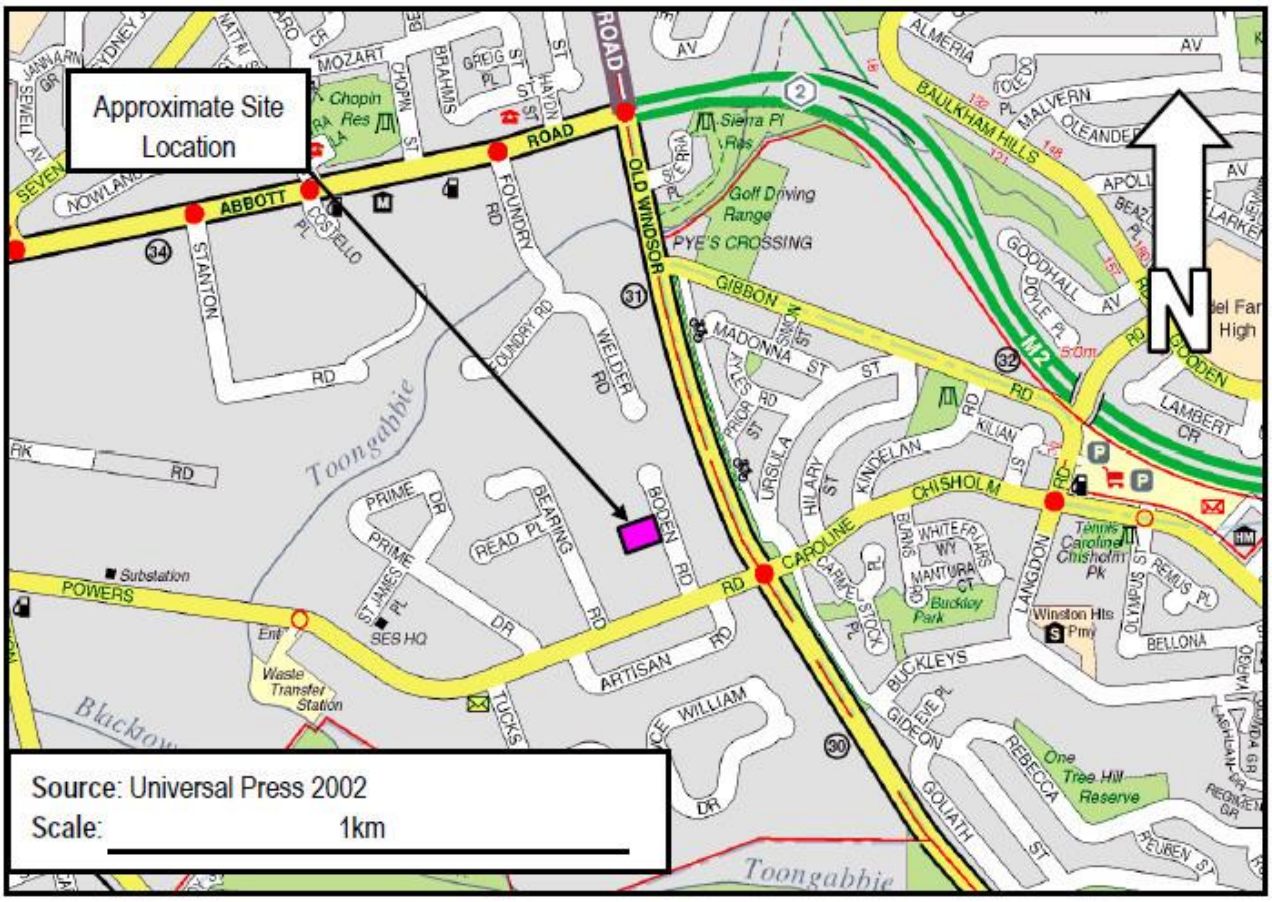
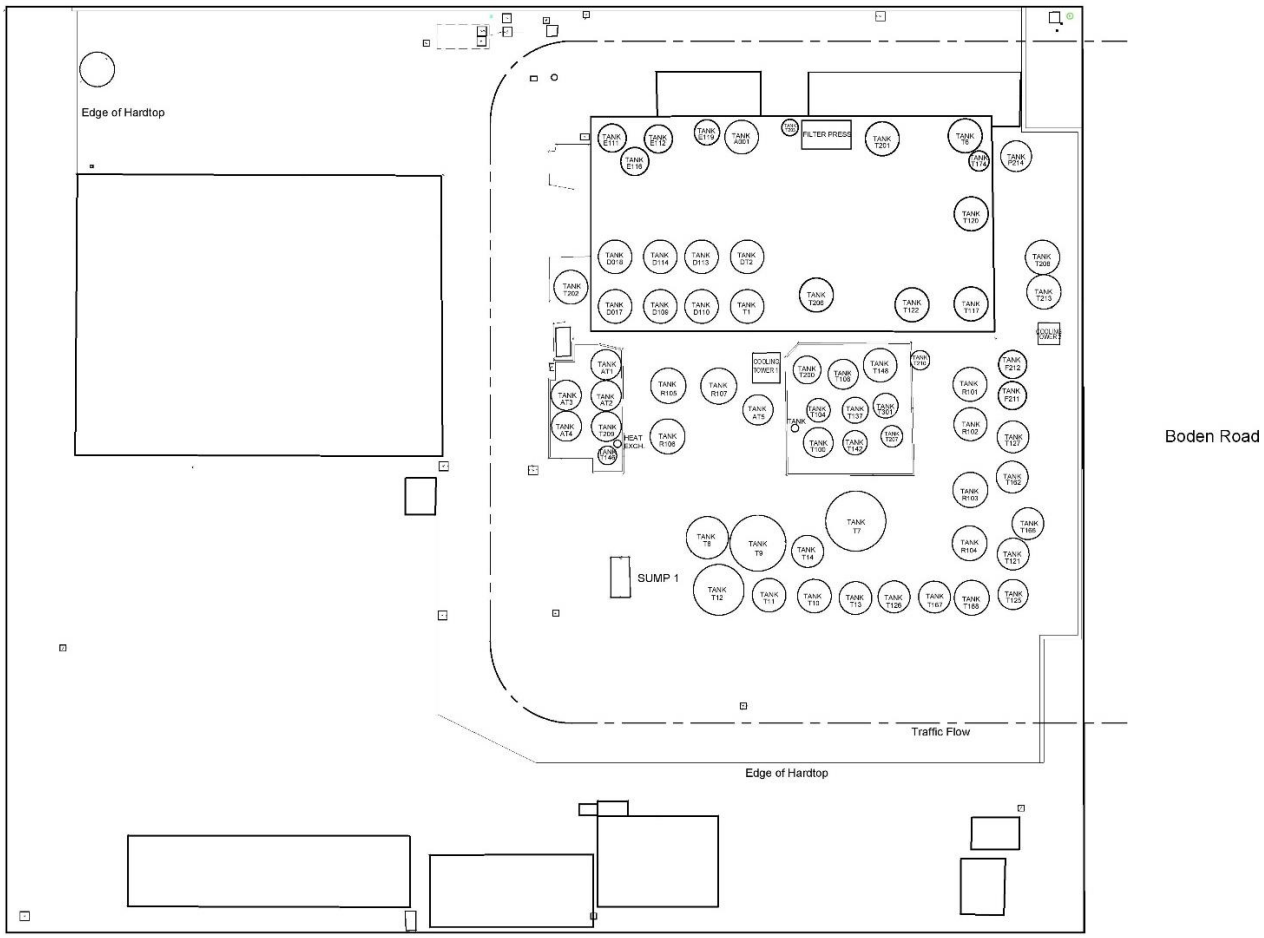


Figure 4-2: Site Map



4.2. Summary Of Hazards

This section describes the potential occupational and environmental hazards associated with the Site's operations that were identified during the completion of a series of risk analysis studies. A discussion on the safety features that have been incorporated into the Site's operations to control or minimise these hazards has been included in the following section.

The hazards can be sub-divided into the following two categories:

(i) Material related hazards associated with the storage and handling of quantities of substances that are classified as Dangerous Goods in accordance with the Australian Dangerous Goods Code 6th Edition, relevant Australian Standards and Occupational Health and Safety Amendment (Dangerous Goods) Regulation 2005.

The inherent chemical and physical properties of these materials require the implementation of particular storage and handling operating procedures to minimise the possibility of a serious or dangerous incident from happening.

(ii) Process related hazards that have the potential to cause severe injury to human life and the surrounding environment if not controlled or managed in an appropriate and effective manner.

Some of these hazards may be associated with the production of intermediary process substances that are hazardous to human health and the environment, if an accidental emission was to occur, or the use of high pressures and/or temperatures with the potential of initiating an explosion or fire due to abnormal process conditions.

4.2.1. Material Related Hazards

The Site shall be storing and handling quantities of dangerous goods as part of its day-to-day operations, most of which are required for processing, batching and decanting. The main material related hazard on site is a major spillage of acid (Class 8 dangerous goods). Fire – either on-site or from off-site is also a potential material related hazard.

Risk of a major spillage occurring is related to the quantity of acid stored on site. The risk of a fire occurring on site would be from the minor storage of LPG gas and flammable products such as acetone. Although the risk of fire is low, a fire on site would have potential to cause an explosion due to the nature of the dangerous goods stored. The different classes of dangerous goods stored and handled at the Site are listed in Table 4-2.

Table 4-2: Classes of Dangerous Goods Stored and Handled at the Site

Class	Class description	Major Hazards
2.1	Flammable gas	Jet fire, unconfined vapour cloud explosion, flash fire, toxicity (under extreme concentrations).
3	Flammable Liquids	Liquids, the vapours of which can ignite in air on contact with a source of ignition, major fire.
5.1	Oxidising Agents	Oxidising substances are not necessarily combustible may readily liberate oxygen and increase the violence of a fire.
8	Corrosives	Cause severe damage with contact with human tissue. Toxic contaminant.

Hazardous Chemicals Stored in Tanks:

Table 4.3a: Inventory of Dangerous Goods stored at the site:

Storage Area	Proper Shipping Name	UN No.	Class/ Division	PG	Type	Design Capacity	Typical Capacity
100	Hydrochloric Acid	1789	8	II	Above Ground Tank	25,000 L	20,000 L
104	Hydrochloric Acid	1789	8	II	Above Ground Tank	25,000 L	20,000 L
108	Hydrochloric Acid	1789	8	II	Above Ground Tank	25,000 L	20,000 L
165	Aluminium Chloride Solution	2581	8	III	Above Ground Tank	25,000 L	20,000 L
142	Aluminium Chloride Solution	2581	8	III	Above Ground Tank	11,500 L	10,000 L
200	Sulphuric Acid	1830	8	II	Above Ground Tank	18,000 L	15,000 L
209	Sulphuric Acid	1830	8	II	Above Ground Tank	18,000 L	18,000 L

Hazardous Chemicals Stored in Containers:

Table 4.3b: Inventory of Dangerous Goods stored at the site:

Storage Area	Proper Shipping Name	UN No.	Class/ Division	PG	Type	Design Capacity	Typical Capacity
WB 1	Formic Acid	1779	8	II	Tank- IBC	65,000 L	50,000 L
WB 2	Hydrochloric Acid	1789	8	II	Tank- IBC	3000 L	2000 L
WB 3	Sulphuric Acid	1830	8	II	Tank- IBC	8000 L	5000 L
WB 4	Polyaluminium Chloride, 30% Basic (Pac 30b)	1760	8	III	Tank- IBC	3000 L	2000 L
WB 5	Polyaluminium Chloride 10% (Pac-Pw)	2581	8	III	Tank- IBC	3000 L	2000 L
WB 6	Sodium Hydroxide Solution 50%	1824	8	II	Tank- IBC	5000 L	2000 L
WB 8	Hydrogen Peroxide Aqueous Solution 50%	2014	5.1	II	Tank- IBC	2000 L	2000 L
WB 9	Hypochlorite Solution 12.5%	1791	8	III	Tank- IBC	2000 L	1000 L
WB 10	Aluminium Chloride Solution	2581	8	III	Tank- IBC	5000 L	3000 L
WB 11	Ferric Chloride Solution	2582	8	II	Tank- IBC	4000 L	3000 L
MS 7	Liquefied Petroleum Gas (LPG)	1075	2.1	N/A	Cylinders	300 L	240 L
	Hydrex 1101 200KG					200	
	Hydrex 1237 17KG					17	119
	Hydrex 1245 20KG	1993	3	III		20	
	Hydrex 1323 1275KG IBC	2693	8	III	IBC	1275	
	Hydrex 1323 19KG	2693	8	III		19	589
	Hydrex 1323 255KG	2693	8	III		255	1020
	Hydrex 1351 17KG					17	17

	Hydrex 1351 230KG					230	1150
	Hydrex 1410 17 KG					17	
	Hydrex 1646 15 KG	2924				15	
	Hydrex 1780 15KG	2733				15	
	Hydrex 1802 20KG	2693				20	420
	Hydrex 1802 264KG	2693				264	1056
	Hydrex 1914 18KG					18	
	Hydrex 1921 1150KG IBC					1150	
	Hydrex 1921 17KG					17	646
	Hydrex 1921 230 KG					230	
	Hydrex 1922 17KG	3266				17	170
	Hydrex 1925 1395KG	2796			IBC	1395	
	Hydrex 1925 21KG	2796				21	945
	Hydrex 1925 280KG	2796				280	2240
	Hydrex 1926 18 KG					18	72
	Hydrex 1926 240KG					240	
	Hydrex 1927 1450KG	1824			IBC	1450	
	Hydrex 1927 22 KG	1824				22	132
	Hydrex 1928 1485KG	1824			IBC	1485	1485
	Hydrex 1928 22KG					22	88
	Hydrex 1928 290KG	1824				290	
	Hydrex 1973 19 KG	1824				19	
	Hydrex 1973 250 KG	1824				250	
	Hydrex 1974 18.5kg	3266				18.5	37
	Hydrex 2240 18.5KG					18.5	
	Hydrex 2240 260KG					260	
	Hydrex 2920 18.5 KG					18.5	
	Hydrex 2921 15KG					15	
	Hydrex 2923 17KG					17	
	Hydrex 2923 220KG					220	
	Hydrex 2927 1265KG	3266			IBC	1265	
	Hydrex 2927 19KG	2922				19	456
	Hydrex 2927 253KG	3266				253	759
	Hydrex 2929 210KG					210	840
	Hydrex 2935 222KG					222	
	Hydrex 2947 17KG					17	816
	Hydrex 2947 225KG					225	225
	Hydrex 2970 18KG	1719				18	18
	Hydrex 2970 245KG	1719				245	
	Hydrex 2972 20KG	3266				20	40
	Hydrex 2973 1000KG			NA	IBC	1000	8000
	Hydrex 2973 20KG			NA		20	
	Hydrex 2974 1240KG			NA	IBC	1240	
	Hydrex 2974 18.5KG			NA		18.5	166.5
	Hydrex 4101 1220 KG	3265			IBC	1220	
	Hydrex 4101 18KG	3265				18	72
	Hydrex 4101 240 KG	3265				240	
	Hydrex 4102 21 KG					21	84
	Hydrex 4102 277 KG					277	
	Hydrex 4104 1220 KG IBC	3265			IBC	1220	
	Hydrex 4104 18KG					18	
	Hydrex 4107 17KG					17	68

	Hydrex 4129 1220KG IBC	3265			IBC	1220	
	Hydrex 4129 18KG	3265				18	414
	Hydrex 4201 16KG - RACK	3265	8	III		16	64
	Hydrex 4202 18 KG	3265	8	III		18	
	Hydrex 4203 16 KG					16	
	Hydrex 4301 1200 KG IBC				IBC	1200	
	Hydrex 4301 18 KG	2693				18	18
	Hydrex 4305 18 KG	2693				18	
	Hydrex 4305 18KG	2693	8	III		18	
	Hydrex 4701 1 KG			NA		1	
	Hydrex 4701 20KG			NA		20	20
	Hydrex 4701 4KG			NA		4	4
	Hydrex 4703 1160 KG IBC			NA	IBC	1160	1160
	Hydrex 4703 17KG			NA		17	17
	Hydrex 4703 232KG			NA		232	
	Hydrex 4704 20KG			NA		20	80
	Hydrex 4704 5KG			NA		5	
	Hydrex 4705 19 KG	1760	8	II		19	
	Hydrex 4705 6 KG	1760	8	II		6	
	Hydrex 4705 1240 KG IBC	1760	8	II	IBC	1240	2480
	Hydrex 4705 19KG	1760	8	II		19	133
	Hydrex 4705 248KG	1760	8	II		248	
	Hydrex 4710 21KG	3266				21	
	Hydrex 4714 15KG	3149	5.1/8	II		15	
	Hydrex 4720 1250KG IBC	3265	8	II	IBC	1250	
	Hydrex 4720 19KG	3265	8	II		19	741
	Hydrex 6501			NA			
	Hydrex 6582 1050KG IBC				IBC	1050	1050
	Hydrex 6582 25KG					25	
	Hydrex 6631 25KG					25	150
	Hydrex 6924 1330KG					1330	
	Hydrex 6925 256KG					256	768
	Hydrex 7111 1130KG IBC	1791			IBC	1130	
	Hydrex 7111 17KG	1791				17	255
	Hydrex 7111 226KG	1791				226	
	Hydrex 7112 10KG PAILS				Pail	10	
	Hydrex 7112 20KG PAILS	3085	5.1		Pail	20	60
	Hydrex 7113 20KG	2465	5.1			20	20
	Hydrex 7210 17KG					17	17
	Hydrex 7211 1400KG IBC				IBC	1400	1400
	Hydrex 7211 21KG					21	
	Hydrex 7311 1080KG IBC	2922			IBC	1080	

	Hydrex 7311 16KG	2922				16	1584
	Hydrex 7311 218KG	2922				218	
	Hydrex 7411 15KG					15	15
	Hydrex 7611 18KG	3265				18	342
	Hydrex 7611 240KG	3265				240	
	Hydrex 7908 20KG	1760				20	320
	Hydrex 7908 244KG	1760				244	976
	Hydrex 9920 1KG					1	
	Hydrex 9920 5KG					5	15

Safety Data Sheets (SDS) for each hazardous substance that are stored at the Site are kept at locations that are accessible to where each chemical is stored. A full set of SDS is kept in the Main Administration Office and in red box on electrical mains room in conjunction with this plan.

Refer to the Emergency Services Information Package at the front of this document for the Site's Dangerous Goods Manifest showing where all the dangerous goods are stored.

4.2.2. Process Related Hazards

The main process related hazards would be a fire and major spill of dangerous good on site. Summary of process-related hazards:

- Damage to dangerous goods package during unloading from transport vehicle, causing a spill of a dangerous goods product;
- Injury to storemen as a result of contact with a dangerous goods product;
- Damage to dangerous goods package as a result of a forklift accident, causing a spill of a dangerous goods product or injury to a storeman;
- A pallet collapses as a result of an unstable storage arrangement, causing possible injury to a storeman and damage to packages; and
- A spill of dangerous goods finds a stormwater drain and has the potential to cause significant environmental harm. There is also the possibility for human injury due to direct or indirect contact with the substance.

Selected locations have been classified as Hazardous Areas. This classification is based on the assumption that there is a strong possibility of an explosive atmosphere being present. These areas require particular precautions relating to equipment type and the use of potential ignition sources, such as naked flames or welding equipment, only under strict supervision.

4.2.3. Potential Pollutants Stored on Site

As part of the new legislation under the POEO Act, the plan must include potential pollutants that are kept on site. This section details the potential pollutants at the site that are not dangerous goods or hazardous materials.

Table 4-4: Potential Pollutants

Pollutant Name	Storage location details	Max Qty
Effluent from wastewater treatment plant	Treated in on–site wastewater treatment plant then released to tradewaste under Sydney Water TWA.	20,000 L
Untreated site runoff water	Captured within storm-water retention pits prior to on-site treatment and release to stormwater.	40,000 L
Filter cake	Filter cake is the solid residue resulting from the treatment of on-site storm-water treatment. It is removed on a regular basis by Transpacific.	10 Tonnes

Non-dangerous goods such as Aluminium pellet and finished product.	Warehouse B	200,000 kg

4.2.4. Risk Assessment

For the purposes of this plan, risk can be evaluated using the following tables:

HOW LIKELY IS AN EVENT TO OCCUR?

LIKELIHOOD

Level	Descriptor	Description
A	Almost Certain	The event is expected to occur in most circumstances.
B	Likely	The event will probably occur in most circumstances.
C	Possible	The event should occur at some time.
D	Unlikely	The event could occur at some time.
E	Rare	The event may occur only in exceptional circumstances.

IF IT DOES OCCUR, WHAT ARE THE WORST-CASE SCENARIO CONSEQUENCES?

CONSEQUENCES OR IMPACT

Level	Descriptor	Description
1	Insignificant	No injuries.
2	Minor	First Aid treatment.
3	Moderate	Medical treatment required.
4	Major	Extensive injuries, loss of product capability.
5	Catastrophic	Death.

Use the information above to find risk level (i.e. Likelihood 'C', Consequence '3', would equal 'H' or High Risk.

Consequence

		1	2	3	4	5
Likelihood		**Insignificant**	**Minor**	**Moderate**	**Major**	**Extreme or Catastrophic**
A	**Almost certain**	**H**	**H**	**H**	**E**	**E**
B	**Likely**	**M**	**H**	**H**	**E**	**E**
C	**Possible**	**L**	**M**	**H**	**H**	**E**
D	**Unlikely**	**L**	**L**	**M**	**H**	**E**
E	**Rare**	**L**	**L**	**M**	**H**	**H**

LEGEND:

E = Extreme Risk **H = High Risk** **M = Moderate Risk** **L = Low Risk**

Table 4-5 provides a risk assessment of the main potential hazards that could occur at the site using the above figures. The level of risk is relevant if the controls are not in place. This highlights the importance of the control measures on that site.

Table 4-5: Hazard & Likelihood Risk Assessment & Control Measures									
Site Name: DGL, Seven Hills Site						**Responsible person:** Chief Warden			
Functional Area	**Description of Hazard / Incident leading to hazard**	**Possible Consequences**	**Consequenc**	**Likelihood**	**Risk Level**	**Control Measures / Corrective Action**	**Consequence**	**Likelihood**	**Risk Level**
1. Delivery and storage of bulk Class 8 dangerous goods	2. Incident causing damage to vehicle carrying DG's. 3. Incorrect attachment of piping during transfer of dangerous goods to bulk tanks.	1. Acid spill in delivery area. 2. Acid escapes bunded area or spills outside bund and enters the stormwater system and flows off-site. 3. Acid comes in contact with metal liberating hydrogen gas causing an explosive atmosphere. 4. Acid comes in contact with water generating toxic fumes. 5. Employees come into contact with acid or toxic fumes and are injured/burned. 6. Explosion occurs	Major	Possible	Extreme	1. All dirty areas of the site drain to a detention tank and is treated prior to release to sewer. 2. Emergency shut off valves are installed on all transport vehicles. 3. All employees are trained in the handling of dangerous goods, spill procedures and are provided with appropriate personal protective equipment (PPE). 4. Employees are in attendance during all unloading operations and are capable to implement spill control procedures and/or emergency response procedures in the event of a large spill. 5. Spill control equipment is provided including large quantities of soda ash and spill kits for use in the event 6. All dangerous goods need to be installed in accordance with AS 3780. All bunding needs to be in accordance with AS 3780. 7. Procedures for unloading practices are followed. Any spills within the delivery area drain to the detention tank and is treated prior to release to sewer with no potential release to the stormwater system. 8. Firefighting equipment is provided, and employees are trained in its use. 9. Emergency procedures are in place for what to do in the event of a spill, fire, or explosion.	Major	Unlikely	High

2. Delivery and storage of flammable products (LPG, acetone)	1. Cylinder / container dropped or damaged during delivery. 2. Incident on site causes damage to cylinder / container	1. Release / Leakage of flammable products in immediate area. 2. Flammable product escapes bunded area or spills outside bund and enters the stormwater system and flows off-site. Employees come in contact with Flammable product and are injured. 3. ignition sources cause a fire. 4. Flammable material comes into contact with hydrogen peroxide or sulfuric acid causing an explosive atmosphere. 5. Fire or contact with acids lead to explosion.	Moderate	Possible	High	1. All dirty areas of the site (external bunded areas) drain to a detention tank and is treated prior to release to sewer. 2. A stormwater valve exists in the first flush area and employees are trained to shut off the valve if a risk to stormwater exists. 3. Spill control equipment is provided including large quantities of soda ash and spill kits for use in the event of a spill. 4. LPG cylinders need to be stored in accordance with AS 4332 and all flammable liquids need to be stored as per AS 1596. 5. All employees are trained in the handling of dangerous goods, spill procedures and are provided with appropriate personal protective equipment (PPE). 6. Employees are in attendance during all unloading operations and are capable to implement spill control procedures and/or emergency response procedures in the event of a large spill. 7. Firefighting equipment is provided and employees are trained in its use. 8. Emergency procedures are in place for what to do in the event of a spill, fire or explosion	Moderate	Unlikely	Medium
3. non-dangerous goods transfer and storage	1. Container / package of non-dangerous good or finished	1. Spill of container / package contents in external area,	Minor	Possibl	Moderat	1. All stormwater is treated in a first flush system prior to release to sewer. 2. A stormwater valve is provided in the first flush area and employees are trained to shut off the valve if a risk to stormwater exists. 3. Spill control equipment is provided including large quantities of soda ash	Mino	Unlik	Low

Table 4-5: Hazard & Likelihood Risk Assessment & Control Measures									
Site Name: DGL, Seven Hills Site						**Responsible person:** Chief Warden			
Functional Area	**Description of Hazard / Incident leading to hazard**	**Possible Consequences**	**Consequenc**	**Likelihood**	**Risk Level**	**Control Measures / Corrective Action**	**Consequence**	**Likelihood**	**Risk Level**
	product is damaged or tipped over during transport from production area. 2. Forklift incident damages package.	entering stormwater drain and flowing off site. 2. Employees come into contact with contents of package causing injury.				and spill kits for use in the event of a spill. 4. All employees are trained in spill procedures and are provided with appropriate personal protective equipment (PPE). 5. Employees are in attendance during all unloading operations and are capable to implement spill control procedures and/or emergency response procedures in the event of a large spill. 6. Firefighting equipment is provided, and employees are trained in its use. 7. Emergency procedures are in place for what to do in the event of a spill, fire, or explosion.			

Table 4-5: Hazard & Likelihood Risk Assessment & Control Measures									
Site Name: DGL, Seven Hills Site						**Responsible person:** Chief Warden			
Functional Area	**Description of Hazard / Incident leading to hazard**	**Possible Consequences**	**Consequenc**	**Likelihood**	**Risk Level**	**Control Measures / Corrective Action**	**Consequence**	**Likelihood**	**Risk Level**
4. Production Area in Warehouse A	1. Incident during mixing / decanting. 2. Failure of processing equipment.	1. Release or spill of raw materials/dangerous goods within production area. 2. Release of toxic vapours. 3. Employees come into contact with spilt material and/or toxic vapours. 4. Release of spilt material outside production area due to failure / hole in bunding, entering stormwater. 5. Spilt material comes into	Severe	Possible	Extreme	1. Bunded production area. 2. Spill control equipment is provided including large quantities of soda ash and spill kits for use in the event of a spill. 3. All employees are trained in spill procedures and are provided with appropriate personal protective equipment (PPE). 4. All stormwater is treated in a first flush system prior to release to sewer and a stormwater isolation valve is provided. 5. Regular inspection and maintenance of production equipment is undertaken. 6. Regular inspections to ensure housekeeping is maintained at a high level and sources of ignition are kept away from these high risk areas.	Moderate	Unlikely	Medium

Table 4-5: Hazard & Likelihood Risk Assessment & Control Measures

Site Name: DGL, Seven Hills Site **Responsible person:** Chief Warden

Functional Area	Description of Hazard / Incident leading to hazard	Possible Consequences	Consequenc	Likelihood	Risk Level	Control Measures / Corrective Action	Consequence	Likelihood	Risk Level
5. WWTP	1. Failure of WWTP.	2. Leakage of untreated wastewater within production area. 3. Untreated wastewater escapes into stormwater and off site. 4. Employees exposed to untreated wastewater	Moderate	Unlikely	Moderate	1. The WWTP is located within Warehouse A and is fully bunded. 2. If bunding failed, the untreated wastewater would flow to the first flush system. 3. A stormwater valve is provided in the first flush area and employees are trained to shut off the valve if a risk to stormwater exists. 4. All employees are trained in spill procedures and are provided with appropriate personal protective equipment (PPE). 5. Regular inspection and maintenance of the WWTP is undertaken.	Minor	Unlikely	Low
6. First flush system	1. Failure of first flush system.	2. Leakage of untreated runoff from dirty areas of the site into stormwater system. 3. Untreated water escapes into	Major	Unlikely	High	1. A stormwater valve is provided in the first flush area and employees are trained to shut off the valve if a risk to stormwater exists. 2. All employees are trained in spill procedures and are provided with appropriate personal protective equipment (PPE). 3. Regular inspection and maintenance of the first flush system is undertaken.	Moderate	Unlikely	Moderate

Table 4-5: Hazard & Likelihood Risk Assessment & Control Measures

Site Name: DGL, Seven Hills Site **Responsible person:** Chief Warden

Functional Area	Description of Hazard / Incident leading to hazard	Possible Consequences	Consequenc	Likelihood	Risk Level	Control Measures / Corrective Action	Consequence	Likelihood	Risk Level
7. External Areas	1. On-site vehicle accident. 2. Damage / rupture of bulk tanks due to collision 3. Leakage from bulk tanks 4. Fuel leakage from vehicles.	1. Chemical or waste spill in external areas. 2. Spill escapes into the stormwater system and flows off-site. 3. Chemical (acid) comes in contact with metal liberating hydrogen gas causing an explosive atmosphere. 4. Acid comes in contact with water generating toxic fumes.	Moderate	Possible	High	1. All stormwater is treated in a first flush system prior to release to sewer. 2. A stormwater valve is provided in the first flush area and employees are trained to shut off the valve if a risk to stormwater exists. 3. Spill control equipment is provided including large quantities of soda ash and spill kits for use in the event of a spill. 4. All employees are trained in spill procedures and are provided with appropriate personal protective equipment (PPE). 5. Employees are in attendance during all unloading operations and are capable to implement spill control procedures and/or emergency response procedures in the event of a large spill. 6. Firefighting equipment is provided and employees are trained in its use. 7. Emergency procedures are in place for what to do in the event of a spill, fire or explosion.	Moderate	Unlikely	Moderate

4.3. Summary Of Safety Systems

A number of important safety features have been incorporated into the design and operation of the Site to reduce the possibility of such hazardous events as mentioned above from happening or minimise their impacts in terms of potential effects on human life and the surrounding environment.

4.3.1. On-site Water Retention System

The facility is currently equipped with stormwater protection, first flush detention and bunding, which would limit pollutant release in the event of a spill in which spill control equipment is not sufficient to limit the extent of the spill. There is a stormwater isolation valve fitted to shut off flow to the stormwater system in the event of a pollution incident.

The facility has a 100,000L first flush detention tank which in times of incident would pump and retain spills exceeding the 20,000 L capacity of the underground pit. The first flush detention tank must be pumped manually to contain the spill.

Dangerous Goods Storage Areas
All dangerous good storage compounds need to comply with the relevant Australian/New Zealand Standards to ensure segregation of different classes of dangerous goods, minimum separation distances to the nearest on-site facilities and ignition sources, bunding arrangements and crest locus limits.

Additional precautions need to be implemented including:

- Regular inspection of bund integrity needs to be undertaken.
- Review of bunding design needs to be undertaken if any changes to the contents of tanks within the bunds are implemented or upon any changes to legislation relating to dangerous goods storage.

The provisions of Personal Protection Equipment (PPE) need to be in accordance with the Australian Standard associated with each dangerous goods Class and as specified in the SDS.

4.3.2. Spill Control Equipment

Due to the acidic nature of the majority of dangerous goods kept on the site, a large quantity of dry soda ash is kept on site within Warehouse B storage racks.
Spill kits are also provided at high-risk locations at the site. Refer to site map.

- External bulk storage tank area
- Near warehouse B storage racks
- Adjacent to LPG storage MS7 near warehouse A entrance

Spill kits contain Spill Mats, Soda Ash Absorbent Vermiculite, Shovels, Knife Valves and Blind Sump Drains.

The site has been fitted with diversion tanks which enable the on-site containment of 110% of the largest tank capacity. The largest capacity tank at the site is 100,000L. The method of achieving 110,000L of containment is through use of a 100,000L first flush detention tank with the existing underground capacity of 20,000L. A 120,000L containment capacity is readily achieved.

The other alternative that was considered was the use of 20,000L + 2 x 35,000L tanks which would equate to 90,000L enabling only around 82% of capacity to be held in the two 100,000L finished goods tanks. The addition of another tank of 20,000L or more would enable use of the 2 x 35,000L tanks in combination to achieve in excess of 110,000L containment.

Based on discussions with several regulatory authorities such as NSW EPA and the NSW Fire Brigades, first flush detention tank system was selected.

The largest tank on the site stores non-dangerous goods but the potential for dangerous goods to be requiring diversion is a site-specific threat. The collection points for the diversion tanks are to appropriately positioned within the existing underground 20,000L containment pit to ensure immersion. This not only ensures proper and efficient pump operation but also minimises collection of ignited liquids, i.e., Pipework to diversion tanks needs to be 100% liquid without oxygen present for ignition support.

It is recommended the backup pump be of higher pumping capacity in times where rapid diversion is required. Times such as incident during a rain event may increase the quantity of liquid requiring containment and the speed of diversion and clean-up would reduce liquid volumes requiring treatment and / or disposal.

On-site staff would be trained in the function of this equipment.

4.3.3. Fire Fighting Equipment

External fire hydrants, hose reels and portable fire extinguishers have been provided for fighting purposes in accordance with the requirements of the Building Code of Australia and relevant Australian Standards.

Table 4-6: Fire Fighting Equipment

Equipment Description	Quantity
Fire Hose Reels	FH x 2, FHR x 4
Fire Hydrants	3
Fire Extinguishers (Carbon Dioxide)	7
Fire Extinguishers (Foam)	0
Fire Extinguishers (Dry Chemical)	15

The Emergency Control Organisation (ECO) can be quickly contacted via the following communication methods:

- Using internal telephone system; and
- Mobile phones (if the person to be contacted is known to be outside the Site)

4.3.4. Personal Protective Equipment (PPE)

Personal protective equipment available to employees includes:

- Coveralls,
- Eye Protection: Safety glasses and face-shield
- Various Gloves,
- Breathing Masks,
- Eye Wash Stations; and
- Shower Stations.
- Full body acid suit

- Work boots
- Hard Hats

4.3.5. Safety Data Sheet (SDS)

SDS registers are located in the office and at the emergency control point in small red box on electrical mains room on site.

5 Types Of Emergencies

The following types of emergencies are covered by this ERP as summarised in Table 5-1.

Table 5-1: Summary of Emergencies & Response Procedures

Emergency Event	Area where Emergency may occur
Fire	Class 2.1 Flammable gas storage area
	Class 3 Store area
	Batching areas
Explosion	Class 2.1 Flammable gas storage area
	Class 3 Store area
Spills	Class 3 Spills during material handling operations or transport
	Class 8 Corrosive liquids storage area
	Collision of road vehicles
Personal Injury	Work accident, such as heart attack, serious fall, severe injury
Natural Events	Earthquake
	Wind and Electrical Storms
	Localised Flooding
Miscellaneous	Bomb Threat
	Vandalism and Civil Disturbance
	Site Evacuation

The emergency procedures have been included in Attachment 1.

6 Emergency Control & Response

The normal hours of operation of the site are 6.00 am to 4:30 pm, Monday to Friday.

6.1. Principles Of Emergency Control & Response

The principles of emergency response will be based on Prevention, Containment, Rescue and First Aid. These have been summarised below:

Prevention	• Inspection of all Site and dangerous goods storage facilities. • Regular emergency response drills to ensure site readiness.
Containment	• Minimize any secondary damage. • Immediate isolation of all electrical power to the affected area. • Strict co-operation with any instructions provided by the Chief Warden.
Emergency Equipment	• Only trained emergency personnel are to use emergency equipment where an emergency situation requires particular precautions (i.e. Spill Kits, Firefighting Equipment) or the use of specialized Personal Protection Equipment (PPE). • Approved safety clothing to be worn. All emergency equipment would be located in relative areas of concern. • Emergency equipment operations must never endanger the safety of personnel.
First Aid	• First-aid officer to provide assistance.

A copy of the Emergency Flowchart is included in Attachment 3.

6.2. Emergency Control Organisation (Eco)

The Emergency Control Organisation (ECO) consists of a group of Site personnel that has the responsibility of providing first response action to an emergency in terms of organising the necessary resources, communications, evacuation of personnel and implementing any corrective actions that may be necessary to return the emergency situation back to normal.

All personnel that are part of the Emergency Control Organisation (ECO) shall be trained in accordance with the procedures contained in this ERP and Australian Standard AS 3745-2002 *Emergency control organisation and procedures for buildings, structures and workplaces* and be recognised as members of the ECO by all other personnel throughout the Site.

The Chief Warden is in charge of overseeing and controlling **all** emergency response actions at the Site. In the case that the Chief Warden is unavailable at the time of the emergency, control will be delegated to the responsibility of the Deputy Chief Warden.

The Emergency Control Organisation (ECO) consists of the following members:

Table 6-1: Emergency Control Organisation Member Summary

Emergency Control Organisation Team Member	Personnel	Phone
Chief Warden	Bill Manning	0433 626 525
Deputy Chief Warden	Ruwan Abeyrathne	0747 876 568
Communications Officer	Melanie O'Neill	0456 256 441
Traffic Control Officer	Phillip Barlocher	0431 744 883
First Aid Officers	Melanie O'Neill Christopher Kelly Joseph Povey Gemerick (Rick) Cacho	0456 256 441 0405 610 414 0498 185 787

All Emergency Control Organisation members clearly understand that they provide the first line of attack in an emergency situation, such as a fire. However, on the instruction to EVACUATE they are to implement their responsibilities as a member of the Emergency Control Organisation. The general responsibilities of the Emergency Control Organisation are discussed in the next section.

6.3. Criteria For Selecting Emergency Response Personnel

Any persons that are appointed to deal with emergencies will in general need to possess the following qualities:

- Be physically capable and willing to carry out their respective duties and tasks.
- Have certain leadership qualities and command authority.
- Have maturity of judgement, good decision-making skills and be capable of remaining calm under pressure; and
- Have clear diction and be able to communicate with all personnel under their care or supervision.

6.4. Principle Roles & Responsibilities

6.4.1. Damage Control

The Emergency Control Organisation at the Site shall be a fully functional emergency response unit. All Emergency Control Organisation personnel shall be trained in the use of advanced fire-fighting techniques and equipment, including the use of fire hydrants, water cannons, fire extinguishers and hose reels with the aim of being able to adequately handle most, if not all, Local and Site Alerts involving fires without the need to involve the local NSW Fire Brigade Service. In the event of a Major Emergency, the effectiveness of the Emergency Control Organisation will ensure that the damage or danger caused by the emergency situation is controlled or minimised until external aid arrives at the Site.

6.4.2. Rescue & First Aid

Selected Emergency Control Organisation members will be nominated as First Aid Officer/s. It will be their task to render assistance in removing any injured personnel from the emergency area and to provide effective management of injuries until the State Ambulance Service arrives on-site.

6.4.3. Communications

A member of the Emergency Control Organisation will be nominated as the Communications Officer. It will be his/her task to monitor communication and facilitate the effective exchange of information between the Site and the relevant State Emergency Services.

The Chief Warden will be responsible for relaying information to the media and other public bodies. All staff will be instructed to **not** discuss such issues with any external bodies, as this is the role of the Chief Warden.

6.4.4. Evacuation

The Chief Warden will determine and control the evacuation of the Site. The Chief Warden will direct staff to evacuate the Site should the emergency grow beyond manageable proportions. To aid in the evacuation an employee checklist will be used by Chief Warden to mark names and ensure all employees working in the affected area have been safely evacuated.

6.4.5. Traffic Control

A Traffic Control Officer, nominated by the Chief Warden will be responsible for ensuring the free flow of traffic around the Site. The task may also involve the removal of any vehicle that may obstruct the free flow of emergency vehicles in and out of the Site.

6.4.6. Emergency Control Centre

In the event of an emergency, the Chief Warden will co-ordinate the emergency response activities from the Emergency Control Centre, which is located at the Administration Office (if appropriate to emergency).

6.4.7. Movement of Vehicles

Vehicles shall not be removed from the carpark area during an emergency requiring evacuation of the premises, unless authorised by the State Emergency Services Commander. This is to avoid a local traffic jam, and to protect employees in vehicles against possible injury.

6.5. Emergency Detection

The main system for fire detection will be the staff at the facility as they would be able to quickly detect any leaks of flammable materials, via visual or odour recognition, which may lead to an increased fire risk. Once such situations are detected appropriate *first response* action would be taken.

Smoke detectors are fitted throughout the facility. Smoke detectors are connected 'back to base' as part of an early warning system. Personnel would raise a Site alarm and appropriate steps taken.

6.6. Evacuation

6.6.1. Initiation

The Chief Warden shall assess the extent and severity of the emergency situation and issue a complete site evacuation order if considered necessary. Non-essential personnel shall be evacuated immediately and if it is considered safe to do so, pre-selected personnel shall remain behind to ensure that the Site is brought to a safe or stable condition before proceeding to the Emergency Assembly Area.

Where a clear danger exists, Site personnel may evacuate on their own initiative to their own Emergency Assembly Areas.

6.6.2. Personnel Accounting System

After evacuating, personnel shall assemble at their designated Emergency Assembly Area. The Chief Warden shall then conduct an attendance roll call to ensure that all persons are accounted for including any visitors and contractors working on-site.

Any missing persons shall be advised immediately to the State Emergency Service upon arrival. The Chief Warden will assess whether or not the on-site emergency response team has the capability or necessary equipment to safely undertake the search and rescue activity of the missing person or wait until the State Emergency Service personnel arrive on-site.

6.6.3. Adjacent Premises

The occupants of adjacent premises should be advised if endangered by the emergency. However, evacuation of those areas is the responsibility of the individual companies and the Emergency Services.

6.6.4. Relocation of Evacuees

If the designated Emergency Assembly Area becomes endangered, or if evacuees are to remain outside the premises for some time, they should be relocated to a suitable, safe alternative location nominated by the Chief Warden.

6.7. Notification Of A Pollution Incident

A pollution incident that occurs in the course of an activity so that material harm to the environment is caused or threatened must be notified. This section details how, when and who needs to be notified. The Pollution Incident Response Procedure provides a step by

step of how to notify a pollution incident and provides relevant documentation that needs to be maintained by the relevant person/s. This procedure is provided as Attachment 2.

6.7.1. When to Notify?

Under Section 148 of the POEO Act, holders of environmental protection licences and anyone carrying on an activity or occupying a licensed premise that becomes aware of a pollution incident are required to report it immediately.

6.7.2. How to Notify?

If the incident presents an immediate threat to human health or property:

CALL 000

Fire and Rescue NSW, the NSW Police, and the NSW Ambulance Service.

If the incident does not present an immediate threat, or once the initial 000 call has been made: Notify the relevant authorities in the following order:

NSW EPA – Environment Line 131 555
Blacktown City Council – 9839 6000 or 1300 133 491
Ministry of Health (Parramatta) – 9840 3603 (After hours: 9845 5555 - ask for Public Health Officer on call)
Fire and Rescue NSW – 000
Notify other persons as required by the EPA.

6.7.3. What to Notify?

Section 150 of the POEO Act specifies relevant information about a pollution incident to be given as follows:

(a) the time, date, nature, duration and location of the incident,
(b) the location of the place where pollution is occurring or is likely to occur,
(c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
(d) the circumstances in which the incident occurred (including the cause of the incident, if known),
(e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
(f) Other information prescribed by the regulations.

The above information is that known to the informant notifying the incident at the time it is notified. If further information becomes known after notification, this information needs to be notified immediately after it becomes known.

6.7.4. Site Contacts

Site personnel with specific responsibilities for incident response and management need to be contacted in the event of an incident. This section contains the names, positions and 24-hour contact details of those key individuals who:

(i) are responsible for activating the plan,
(ii) are authorised to notify relevant authorities under section 148 of the Act, and
(iii) are responsible for managing the response to a pollution incident.

Refer to table 6.1 for a list of the key individuals and their responsibilities. These key individuals are listed in order of who to contact in the event of a pollution incident at the site.

6.7.5. Regulatory Authority Contacts

The contact details of each relevant authority referred to in section 148 of the Act that are relevant to this site include:

- NSW EPA – Environment Line 131 555
- Blacktown City Council – 9839 6000 or 1300 133 491
- Ministry of Health (Parramatta) – 9840 3603 (After hours: 9845 5555- ask for Public Health Officer on call)
- WorkCover on 13 10 50 (WorkCover will ask for the ABN)
- Fire and Rescue NSW – 000

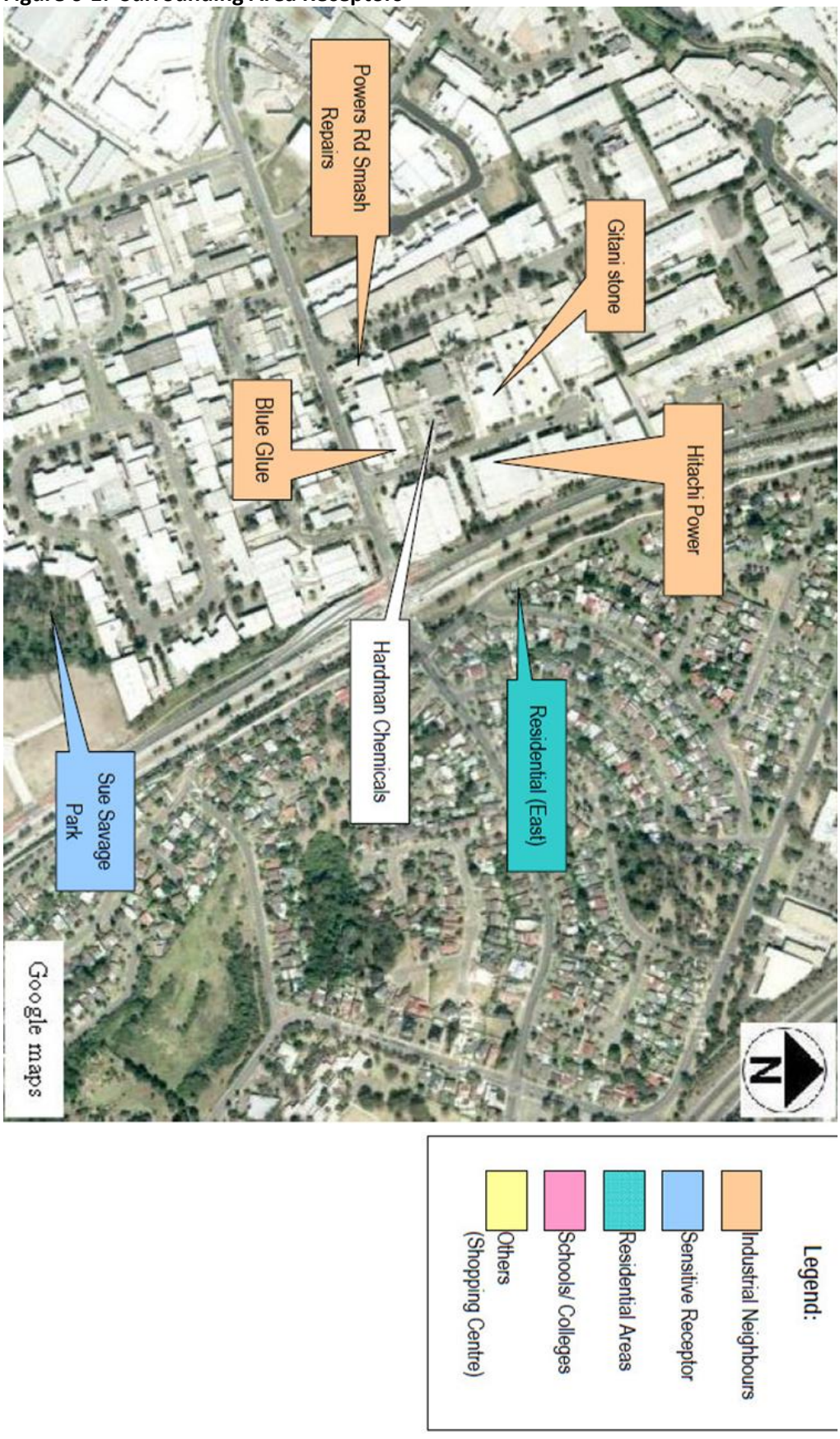
6.7.6. Surrounding Area Receptors

The nearest sensitive receptors and neighbouring facilities have been identified in Fig. 6-1 and it shows the location of these sensitive receptors.

Table 6-3: Surrounding Area Receptors

Receptor	Nature of Occupancy	Distance	Phone	Address
Blue Glue	Industrial	20m	(02) 9620 7500	6/1 Boden Road
Gitani stone	Industrial	20m	(02) 9838 8880	15 Boden Road
Hitachi Power Tools	Industrial	30m	(02) 8887 8100	1/10 Boden Road
Powers Rd Smash Repairs	Industrial	20m	(02) 9624 6322	42 Powers Road
Sue Savage Park	Residential	450m	N/A	Seven Hills NSW 2147
Residential (East)	Residential	180m	N/A	401 Old Windsor Road
Residential (South)	Residential	700m	N/A	56 Vianney Cres
Residential (North)	Residential	850m	N/A	115 Abbot Road
Residential (West)	Residential	1,300m	N/A	3 Railway Avenue

Figure 6-1: Surrounding Area Receptors



Communication mechanisms that would be used to notify these sensitive receptors would be dependent on the nature and extent of the pollution incident. Communication methods would be decided upon by the Emergency Control Organisation in liaison with emergency services and would be the following or a combination of the following:

- Telephone calls;
- Incident notifications on the company website;
- Letterbox drops; or
- Door-knocking

6.8. Statutory Investigation Of Incident

Government authorities such as the NSW Coroner, NSW Police Service, WorkCover Authority or the NSW EPA may request a formal investigation or Coronial Inquiry to be carried out on certain types of emergencies, particularly in the case of fatalities. Full co-operation should be given to such request.

During emergency operations the Chief Warden should attempt to ensure that the area is only disturbed as much as is necessary to control the incident, until investigations are completed. Actions taken during the emergency and any noteworthy features of the incident should be advised to the investigator. There must be no interference with the scene of the accident or evidence contained therein which may be used in the inquiry.

6.9. Written Report On Emergency & Review Of Emergency Plan

After any emergency, the Chief Warden and other members of the ECO shall prepare a detailed incident report within 28 days of the incident occurring outlining the following information:

- Reason and cause of incident.
- Review of the emergency response performance.
- Recommendations on preventative strategies or additional safety systems that may be considered essential to avoid a recurrence of the incident; and
- Recommendations on methods or ways to improve the emergency response performance so that any future incidents can be dealt with in a more effective manner.

The Incident Reporting Procedure and relevant documentation to be submitted in conjunction with the report are included in Attachment 2.

6.10. Emergency Training

A general overview of the respective training requirements for particular personnel is discussed in the following sections.

6.10.1. General Personnel and Contractors

All personnel working at the Site who are not directly involved in the ECO shall be trained in the basic emergency response procedures. All personnel must undertake Induction Training at the commencement of their employment at the Site and would continue to attend every 2 years thereafter.

Any contractors that work at the Site would be subjected to similar induction training. Competency would be recorded following the completion of the training program to ensure that the employee has acquired a satisfactory level of knowledge.

6.10.2. Emergency Control Organisation Personnel

All ECO personnel shall be trained in the use of advanced fire-fighting techniques and equipment, including the use of fire extinguishers and hose reels. The aim of this training is to be capable of adequately handling most, if not all, local and Site alerts involving fires without need of the external assistance of the local NSW Fire Brigade Service.

Further training involving the correct emergency procedures to be used when dealing with emergency incidents that include major quantities of dangerous goods, such as those found in the Site, would also be included as part of the intensive training program. All emergency training is designed to ensure that the ECO is ready for an emergency at the Site.

Personnel designated as First-Aid Officers shall be trained to the standard required in the Occupational Health and Safety Regulation 2001 under the Occupational Health and Safety Act 2000. Retraining shall be conducted at the intervals recommended by the relevant authority.

Key personnel with responsibilities relating to the notification of pollution incidents need to undertake training in the following:

- What constitutes a pollution incident that requires notification and that it needs to be notified "immediately";
- Definitions of "pollution incident", "material risk of harm", and "immediately";
- New responsibilities in relation to notification of a pollution incident; and
- Notification of a pollution incident procedure (Attachment 4) i.e.: when to notify, who to notify, what to notify.

6.11. Review And Revision Of The Plan

This plan needs to be reviewed once per year, or otherwise following:

- Within one month of any emergency, pollution incident that requires notification or training exercise that exposes shortcomings.
- Following any significant changes to the layout or operations on site

Review and testing of the plan needs to ensure:

- Information in the plan is accurate and up to date; and
- The plan is capable of being implemented in a workable and effective manner.

Testing must cover all components of the plan including the effectiveness of staff training. This is undertaken as follows:

- Annual review of PIRMP and emergency plan standard procedures to ensure all information is accurate and up to date; and
- Regular drills - if a drill is undertaken, the details of what was tested, how effective the drill was, and any changes required to the plan / procedures should be noted.

7 References

- NSW Department of Urban Affairs and Planning 1993, Hazardous Industry Planning Advisory Paper (HIPAP) No.1 – Industry Emergency Planning Guidelines
- NSW Fire Brigades Fire Safety Division 2006, Policy No.1: Guidelines for Emergency Plans at Facilities having Notifiable Quantities of Dangerous Goods, State Government of NSW (NSWFB) August 2006
- Standards Australia 2004, SAA/SNZ HB76:2004 Dangerous Goods - Initial Emergency Response Guide
- Standards Australia 2002, AS 3745-2002 Emergency control organisation and procedures for buildings, structures and workplaces
- Occupational Health and Safety Act 2000 (NSW) Occupational Health and Safety Regulation 2011 (NSW)
- Guideline: Pollution Incident Response Management Plans (NSW EPA)

8 Limitations

This report has been prepared solely for the use by DGL. DGL Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. No responsibility is accepted for the use of any part of the report in any other context or for any other purpose.

Opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal opinions.

Attachment 1:

Emergency Contact Numbers

Dial 0 for an external line before dialling the number required or ask the receptionist to connect you.

EMERGENCY SERVICES

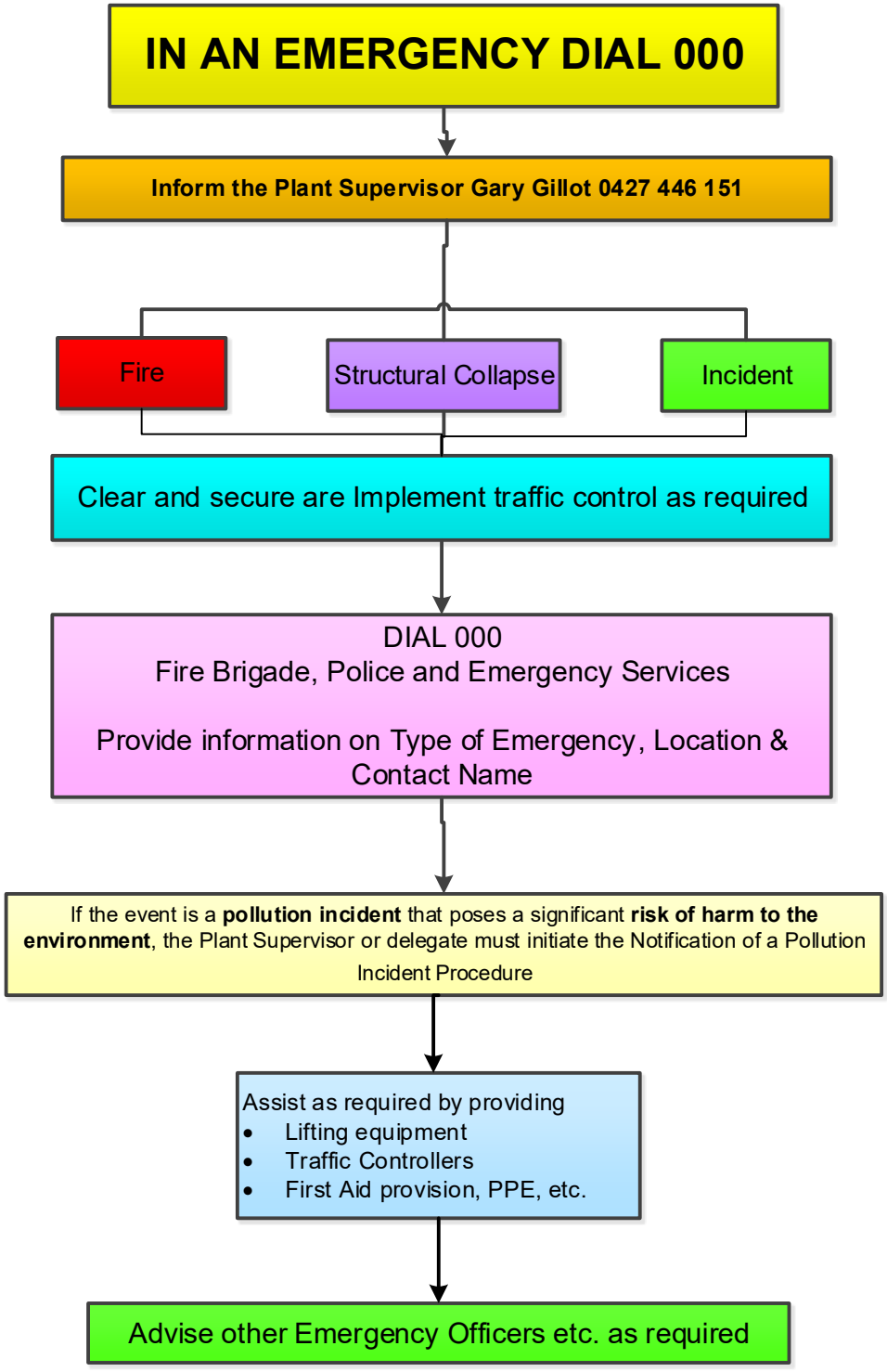
Ambulance – Fire Brigade – Police		000
Poisons Information Centre		131126
Police	Blacktown	9622 0000
	Seven Hills	9838 9000
Blacktown District Hospital		9830 8000
Westmead Hospital		9845 5555

NOTIFICATION OF A POLLUTION INCIDENT

NSW Environment Protection Authority	131 555
Blacktown City Council	9839 6000
NSW Ministry of Health(Parramatta)	9840 3603
After Hours (ask for public health officer)	9845 5555
WorkCover NSW	131 050
Fire and Rescue NSW	000

SERVICE & GENERAL	
Pacific Medical Centre – Oasis Occupational Health and Safety	02 9831 2596
Electricians – Kouts 24 HR Electrical Services	0415 382 408
ELGAS – Rep: Andrew Adams	0401 987 569
BOC	1300 728 522
Sydney Water Sydney Water – Seven Hills (John)	13 1110 02 9622 2244

Attachment 1: **Emergency Flow Chart**



Attachment 2: **Notification of a Pollution Incident Procedure**