



MIROTONE

Pollution Incident Response Management Plan

POLLUTION INCIDENT RESPOSE MANAGEMENT PLAN

MIROTONE – CHIPPING NORTON

UPDATED 28th MARCH 2018 BY JOHN DAVEY



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Pollution Incident Response Management Plan

1. Purpose

The purpose of Mirotone's Pollution Incident Response Management Plan is to improve the way pollution incidents are reported, managed and communicated to the general community. The plan is designed to facilitate better coordination with the relevant response agencies.

This document covers chemical spill management and the Emergency Response Plan.

2. Legislative Requirement

In accordance with Part 5.7A of the Protection of Environment Operation Act 1997 and the Protection of the Environment Operations (General) Regulation 2009 holders of an EPA

Environment Protection Licence (EPL) are required to:

- prepare a Pollution Incident Response Management Plan (section 153A, POEO Act). This plan will form part of Mirotone's Emergency Procedures Manual.
- test the plan in accordance with the POEO Regulation (clause 98E).
- report pollution incidents immediately to the appropriate authority.
- notify all relevant authorities about the incident under the POEO Act. For Mirotone authorities include the EPA, WorkCover NSW, Emergency Services, Ministers Officer and Bankstown City Council. This will ensure that the appropriate agencies have the information they need to respond promptly and without delay.

Penalties exist under the POEO Act for failing to comply with this requirement.

3. Licence Details

Mirotone holds an:

Environment Protection Licence (Number: 20393).

Work Cover – Notification of Dangerous Goods on Premises (NDG034415)



1. Definition

A pollution incident is:

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 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.

A pollution incident is required to be notified if there is a risk of material harm to the environment, which is defined in section 147 of the 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 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.

Immediately

Immediately is defined as promptly and without delay. For the purposes of external notification, Mirotone is required to notify external authorities within 1 hour of learning that the incident has occurred.

Refer to Section 4.7

Management Action

Ensure the area to safe and secure to approach.

Locate the source of the spill and identify if any hazardous materials are involved.

Locate Material Safety Data Sheet (MSDS) for the substance (if known) to obtain information about clean-up procedures and advice on appropriate Personal Protection

Equipment that may be required.

Take steps to prevent unauthorised staff or visitors' access.

Assess potential harm and minimise environmental contamination. i.e. ensure substance is prevented from entering water body using spill kit, hay bales or other suitable absorbent material.



Disposal & Incident Reporting

Ensure environmentally responsible disposal of contaminated material as per the MSDS, HR Chemical Management Policy and relevant legislation.

Disposal must be arranged with an EPA licensed contractor.

An Environment Incident and/or WHS Incident Form must be completed in accordance with Mirotone's internal incident reporting procedures.

4.1 4.2 Risk Assessment & Management Plan

This section includes identification, description and likelihood of the primary hazards to human health or the environment associated with operation of the waste water treatment plant.

Mirotone's Warehouse / Factory is located in an industrial area immediately adjacent to commercial activities and residential houses (approximately 50 metres west from the site). Apart from the bunded area within the warehouse and factory, the site has a secondary bund with an emergency shut off valve to stop fluid from leaving site during an incident. All care must be taken to ensure both environmental and health risks are eliminated or mitigated in accordance with factory management.

Activity	Potential Hazard	Risk Score	Pre-Emptive Actions	Community Notifications
Chemical storage	Chemical Spill	Med	All chemicals stored in bunded area to contain any spills. Spill kits are available to absorb spill.	Website
Chemical use	Chemical Spill	Med	All Chemical are handled in accordance with standard operating procedure to minimise potential to spills and exposer.	Website
R2585 – TDI – Toluene Di Isocyanate	Various	High > Extreme	Various pre-emptive measures are in place to minimise risk and harm. Refer to the current assessment	Website
Discharge	TDI – Air Pollutant	Low	TDI Emission Monitoring compliance conditions specified in the licence conditions	Website



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Tanker Unload	Solvent Spill	Low	<p>Managed in accordance with operating procedure F50-10-01.</p> <p>The truck must be position in the bunded area designed for Tanker deliveries</p> <p>Valve to adjacent stormwater pit can be isolated in event of a spill.</p> <p>The pit can capture and isolate solvent in the event that spill that cannot initially contained within the bunded area.</p>	Website (if required)
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4.3 Inventory of pollutants

Storage ID UN Number	Storage Type Description	Max Storage Capacity (Kg/L)		
		Class/Division	Typical Quantity	Packing Group
1A 1950	Roofed Store AEROSOLS	150kg 2	150kg	
1B 1950	Roofed Store AEROSOLS	150kg 2	150kg	
1C	Roofed Store AEROSOLS	150kg 2	150kg	
2 1219	Warehouse ISOPROPANAL (IOSPROPYL ALCOHOL)	250000L 3	10000L	II
2 1866	Warehouse RESIN SOLUTION		20000L	II
2 1263	Warehouse PAINT RELEATED MATERIAL (including paint thinning or reducing compound)		5000L	II
2 1263	Warehouse PAINT RELATED MATERIAL		200000L	II
3A 2078	Roofed Store TOLUENE DIISOCYANATE	1000kg 6.1	10000kg	
3D 2078	Warehouse TOLUENE DIISOCYANATE	25000kg 6.1	25000kg	
4A 3295	Underground Tank	22000L 3	22000L	II



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	HYDROCARBONS, Liquid, N.O.S			
4D 1307	Underground Tank XYLENES	5000L 3	5000L	III
4G 3272	Underground Tank ESTERS N.O.S	5000L 3	5000L	III
4H 1268	Underground Tank PETROLEUM DISTILLATES, N.O.S	22000L 3	22000L	III
4K	Underground Tank BUTYL ACETATES	5000L 3	5000L	III

Site Map

77 Governor Macquarie Drive Chipping Norton NSW 2170



 Bunded, manufacturing and storage areas

 Storm water discharge point

 Underground storage tanks



4.4 Safety equipment

Safety Equipment	Description	Location
Chemical MSDS	Information regarding chemicals	Located in the Emergence Box or on the Mirotone computer file system
Leak detection for solvent tanks	Leak detection system for underground storage	Warehouse Managers Office
Spill kits	Equipment to absorb spills at designated locations	Warehouse Managers Office
PPE	Personal protection equipment which is required in accordance with MSDS specifications	Warehouse Managers Office

4.5 Emergency Contact Details

Name	Position	Contact Number
Lyndon Bailey	Group Technical Manager	0412 841 114
Stephane Suzor	Operations Manager	0481 503 620
David Morris	Warehouse Manager	02 9728 5571
24 hr Security	Security Company	1300 133 343

Secondary Emergency Contact

The following people must be notified of an incident in order to ensure the relevant authorities are notified in accordance with the legislation

Name	Position	Contact Number
Customer Service		02 9795 3700
Emma Tune	Marketing Manager	0412 174 474

Notification

Under section 148 of the POEO Act Mirotone is required to report pollution incidents immediately to all five relevant authorities.

Authority	Contact Number
EPA	131 500
NSW Health	9391 9000
Fire & Rescue, Police	000
Workcover NSW	131 050
Liverpool City Council	1300 36 2170



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4.6 Communications with the Local Community

Mirotone is committed to ensuring that those in our local community who may be potentially impacted by a pollution incident are adequately notified. Notifications to the community is the responsibility of Mirotone's Management Team and would be undertaken via Mirotone's website and Liverpool City Council, where considered appropriate

Complaints

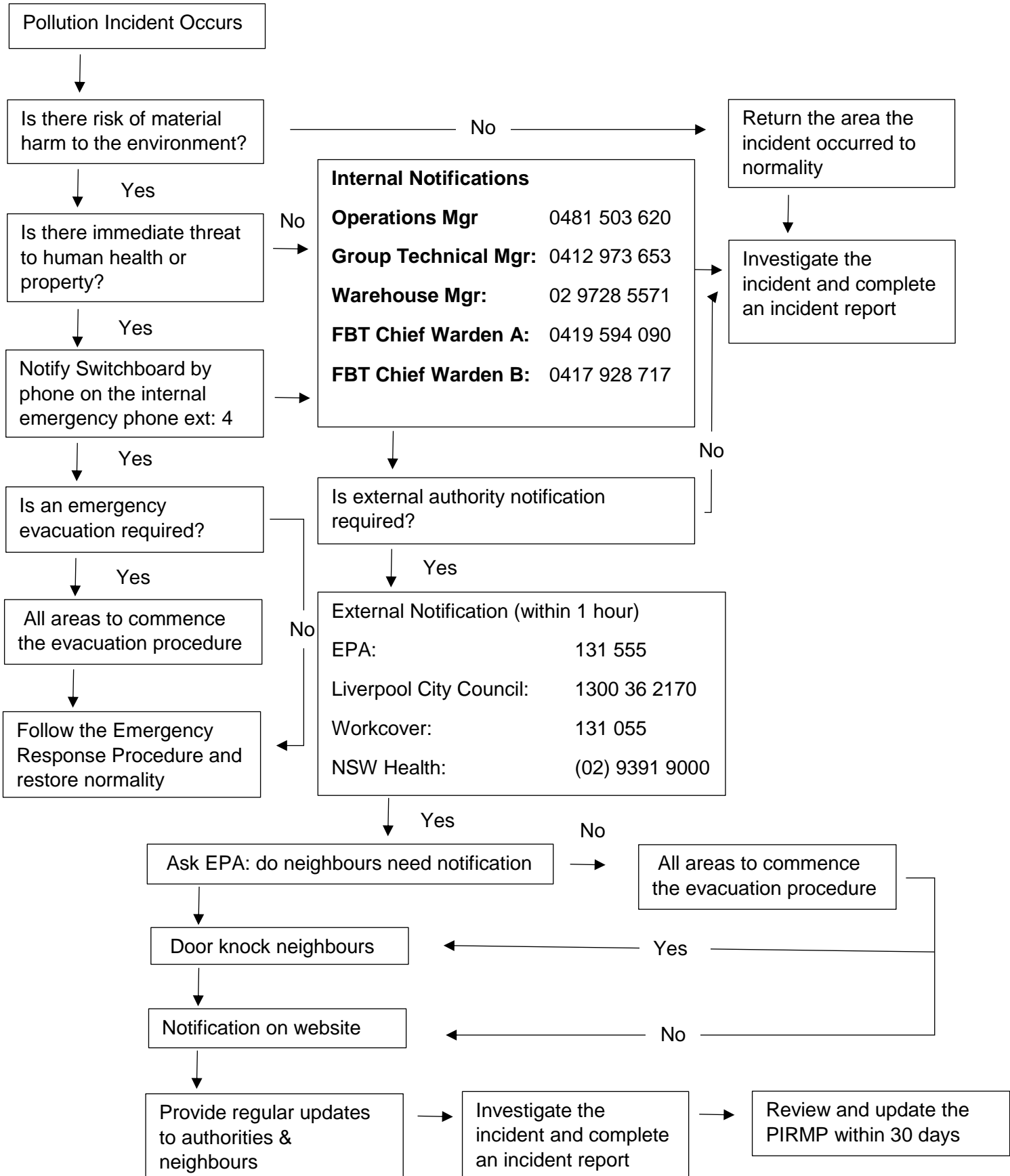
Complaints can be made directly to Mirotone in writing to webmaster@mirotone.com.au or by phone on (02) 9795 3700



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Pollution Incident Response Flowchart





4.7 Chipping Norton Emergency Evacuation Plan

HOW TO RAISE THE ALARM

In the event of an Emergency, evacuation of the plant may be necessary.

If an evacuation is considered necessary, the EVACUATION TONE will sound, The EVACUATION TONE is a continuous BELL in the Production/ Warehouse Area and is continuous Alarm Bells in the Office Block. Both EVACUATION TONES will sound simultaneously, but separately, in their respective areas.

Staff MUST, on hearing the Evacuation Tone, EVACUATE the building via the nearest EXIT and report to the ASSEMBLY AREA – POINT A marked on the attached Site Plan and await further instructions.

Departmental Managers are responsible for ensuring that their area(s) are clear of all personnel.

If the Warehouse Manager is on site, he/she or a specifically nominated person will become the Emergency Controller. It is their task to confirm which grade of emergency exists.

Responding to an Emergency

There are five specific response activities during an emergency:

- Raise Alarm: The person discovering an emergency situation must activate the alarm and immediately contact a senior staff member. If in doubt, always activate the alarm;
- Containment: The aim is to minimise spread and to limit any secondary damage;
- Rescue: Rescue of personnel should only be undertaken when conditions do not endanger the safety of rescuers. Appropriate Personal Protective Equipment (PPE) must be worn;
- First Aid: Render first aid to any injured persons;
- Evacuate: If an evacuation is considered necessary the alarm will sound.

This should be a unique tone to differentiate it from other alarm types. Staff will evacuate via the nearest exit and report to ASSEMBLY POINT A.



Types of Emergencies

The following types of emergencies are considered in this Plan:

- Fire
- Explosion
- Spills
- Natural Events:
 - Flood
 - Scrub/bush fire
 - Cyclones, wind and electrical storms
 - Land slip/subsidence
 - Earthquake
- Impact Events:
 - Aircraft
 - Road vehicles
- Civil Disturbances:
 - Bomb threats
 - Riots

4.7.1 EMERGENCY PROCEDURES

In the event of an emergency arising, the Site Command Centre is Point A -

Fire Emergency Response Procedure

All staff members at the Chipping Norton site have received a degree of fire awareness and Emergency Response training. All personnel should be aware of:

- The means of escape in case of fire – Fire Exits;
- The location and operating procedures for firefighting equipment;
- The location of the Fire Alarm;
- The need to keep Fire Exits and firefighting equipment free from obstruction at all times;
- The importance of turning off all machinery and, if possible, main power switches;
- Remaining calm DO NOT PANIC. Look around and ensure fellow workers are aware of Emergency.

4.7.2 Within the guidelines of this Emergency Response Procedure and a staff member's confidence in their abilities to assess and perhaps respond to a Fire situation in their immediate vicinity, individual staff members may opt to attend to the Emergency at its source or to evacuate per the Site Evacuation Plan.

4.7.3 The person raising the alarm and activating the Fire Alarm will immediately shut down the Main Factory Power Supply, gather clock-on cards and visitor register and move to POINT B where designated Fire Team Member/s will muster. The alarm activator will inform the Fire Team of the nature and location of the Emergency, after which that person will move to the EVACUATION ASSEMBLY AREA (POINT A).

FBT Staff will check upstairs, gather their visitor register and move to POINT B and coordinate with Mirotone chief warden.



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4.7.4 Designated Fire Team Members, if not at the immediate location of the fire, shall muster at POINT B. After being briefed on details of the fire, Fire Team Members will proceed to the location of the fire and, if capable, contain the fire until the Fire Brigade arrives. If the fire is beyond the Fire Team's control they are to order the evacuation of any staff member in the area and immediately evacuate themselves to POINT A.

NOTE: If the Fire Team Members are at the location of the fire when the alarm sounds, they are to assess the situation and take appropriate action and NOT muster at POINT B.

4.7.5 The Warehouse Manager or any staff member after evacuating to Point A, shall contact the Fire Brigade on 000 and inform them, that there is an Emergency at MIROTONE, a Paint Manufacturing and Storage Facility, at 77 Governor Macquarie Drive, Chipping Norton (nearest cross-street Childs Road). The caller will include any other information regarding the nature of the Emergency.

4.7.6 All Factory, Laboratory, Stores and Office staff who have no set duties under these procedures shall, on hearing the Fire Alarm, proceed directly to the EVACUATION ASSEMBLY AREA (POINT A). Under NO circumstances are staff to re-enter a building once the Fire Alarm has sounded, except for members of the Fire Team. No staff member is to re-enter the site once evacuated beyond the boundary fence until further instructed by Senior Staff or Fire Brigade Officers.

4.7.7 Stores personnel are to ensure that all Customers and Transport Drivers are alerted, warned and escorted to the EVACUATION ASSEMBLY AREA.

4.7.8 Staff members who have signed visitors on site have the responsibilities of ensuring their visitors are familiar with this FIRE EMERGENCY RESPONSE PROCEDURE, THE SITE EVACUATION PROCEDURE and the Site Plans which accompany them. Staff are also responsible for escorting their visitors to the EVACUATION ASSEMBLY AREA.

4.7.9 Need to make mention of closing fire doors when evacuating. Must be identified on map.

4.7.10 When all personnel, customers, visitors and transport drivers are gathered at the EVACUATION ASSEMBLY AREA a roll call will take place using firstly, the Visitors Book, followed by the Clock-on Cards (allowing for absent Fire Crew Members) and lastly, the Staff Register Board.

4.7.11 A reliable staff member is to be posted at the Main Gate to provide Fire Brigade Officers with the following information:

- The location of the enlarged coloured coded Site Plan and MSDS;
- Roll Call status (any persons not accounted for);
- Electrical power supply situation;
- Any updated information on the Emergency.



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Explosion Emergency Response Procedure

Follow same procedure as for Fire Emergency.

Spillage Emergency Response Procedure

All factory staff are trained in the appropriate methods of containing spills. Staff are also aware of environmental impacts occurring as a result of 'loss of containment'.

- 4.7.12 In the event of a materials spill – wherever it may occur on site – initial and immediate response must involve measures to contain the spill in its particular location.
- 4.7.13 The major consideration in this response is to prevent any spilled material and/or materials used for containment, from entering stormwater or sewerage drainage systems or, in any other way, affecting the local environment.
- 4.7.14 As soon as a spill is apparent, staff must isolate the spill by using various containment products to form a barrier. Sand and containment booms can be used to dam and absorb the product.
- 4.7.15 Immediately the Spillage is under initial control, a staff member from the incident location is to brief the Team Leader – who is to take charge of the situation – and then to brief Production Management and Laboratory staff.
- 4.7.16 Management staff will assess implications of the Spill and containment measures used. And also determine how to clean up and dispose of material in accordance with environmental guidelines.
- 4.7.17 A site plan is attached and major open access to stormwater drains is marked. The site plan is colour coded denoting bunded and non-bunded areas.

Natural Events

Floods:

The likelihood of an emergency due to flooding is possible. Any such emergency would probably involve a spillage. Treat as such. There is a remote possibility that flood damage may present a fire hazard. Again, follow procedures for fire emergencies.

Scrub Fire/Bush Fire:

The possibility of the site being threatened by a bush fire is remote. The only possible scenario would be a fire started in the landscaped areas on site. In the event of this occurring, the site Fire Crew would be capable of controlling the situation.

Cyclones, Wind and Electrical Storms:

Again an emergency developing as a result of storms is remote. Any such emergency would probably either involve a potential fire hazard or spillage. Treat as appropriate.



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Impact Events

Impact from Road Vehicles:

The position of the site, buildings setbacks and road classification (speed limits) render the site safe from major impacts. Vehicles entering the site are slowed by speed humps hence any impacts would be of a minor nature and not likely to lead to an emergency.

Aircraft Impact:

Follow procedures as outlined in Fire and/or Explosion emergencies.

Civil Disturbances

Riots:

The site is not considered to be in a politically sensitive region and would not be subject to civil unrest. However, should an emergency ever eventuate, the procedures outlined below should be followed;

- Sound the Emergency Siren and gather all personnel at the Point B staging area;
- Secure all perimeter gates to prevent access;
- Notify Police, other emergency services and/or private security personnel.

Bomb Threats:

In the event of a Bomb Threat the following actions should be taken;

- The person receiving the bomb threat should show some interest and attempt to glean as much information as possible;
- The receiver must immediately advise the Warehouse Manager;
- The Warehouse Manager will sound alarm. The Warehouse Manager shall contact the Police on 000 and inform them, that there is an Emergency at MIROTONE, a Paint Manufacturing and Storage Facility, at 77 Governor Macquarie Drive, Chipping Norton (nearest cross-street Childs Road).
- The Warehouse Manager will liaise with emergency services in an advisory capacity, particularly with regard to specific site hazards.



4.8 Training & Awareness

Employees

Training and Awareness sessions will be held with key stakeholders upon implementation of the PIRMP. A structured information package will also be included into Mirotone staff Induction program. All training records are held with Human Resources.

Contractors

Contractors will be made aware of the PIRMP requirements via Conditions of Entry for Working on site at Mirotone and Induction. Records are held with Production Manager.

Requirements of the Plan

This plan is effective from 1 September 2012.

A copy of this plan must be forwarded to the relevant response agencies in written form. The plan must also be available at Mirotone (located at Reception) and be available to be provided to an authorised EPA officer on request.

A copy of the current license must be kept with this plan and be available to an authorised EPA officer on request.

TESTING

Date	Time	Comments
April 2014	11:00am	Nil
5 th August 2015	1:30pm	Staff were reminded to close the Fire Door between the warehouses. FBT ask for an assigned Fire Warden. Change will be implemented.
28 th March 2018	5:00pm	Staff Updates