PASCOE'S PTY LTD

EMERGENCY RESPONSE MANUAL

(Incorporating)

Pollution Incident Response Management Plan

SOP 517

March 2023

40-46 FAIRFIELD STREET
FAIRFIELD EAST,
NSW, 2165.

EMERGENCY TELEPHONE: 1800 242 176 (24Hr)

FACSIMILE: 02 9632 1924

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Document Control

Authorised By	Position	Date
Shane Roberts	**Operations Manager (Fairfield Sydney)**	**Mar 2023**
Chris Cause	**Engineering/Supervisor (Fairfield Sydney)**	**Mar 2023**
Kim Baker	**Regulatory Affairs Manager (Fairfield Sydney)**	**Mar 2023**
Gaynor Daniels	**HSES Advisor (Fairfield Sydney)**	**Mar 2023**

Distribution List

Copy no.	Recipient
1	Engineering/Supervisor Fairfield / Chief Warden – (Fairfield) (Facility Emergency Controller)
2	Operations Manager – (Fairfield) (Alternate Emergency Controller)
3	HSES Advisor (Fairfield)
4	QA Manager (Fairfield)
5	Warehouse Manager (Fairfield)
6	Regulatory Affairs Manager (Fairfield)
7	Production Supervisor (Fairfield)
8	Fairfield City Council
9	Fire Brigade – (Fairfield)
10	Fire & Rescue NSW lodgement as a result of DG license
11	PACT Group Head Office copy
12	Fairfield St Front Entry Main Fire Alarm Panel
13	Fairfield St East side Driveway, Red Emergency Control Box.

Record of Revisions

Revision no.	Date	Revised by	Description
1	March 2012	K Clemmans	Draft.
2	May 2012	M Keith	Finalisation, authorisation and issue
3	October 2013	M Keith	Annual review and update
4.	October 2013	M Keith	Annual review and update
5.	April 2014	M Keith	Change Waste Company name
6	May 2014	M Keith	Annual Review
7	March 2015	K Baker	Annual Review / Including updated Haz & DG Chemical Register
8	July 2015	K Baker	Update Key Contacts
9	October 2015	K Baker	%LEL & Evacuation orders
10	May 2017	K Baker	PACT Group alignment & Annual review
11	Jan 2019	K Baker	Annual Review / Structure / Hazchem Listing update, People & Phone changes
12	March 2019	K. Baker	Org. Structure & Responsibility change
13	February 2020	K. Baker	Staff changes
14	October 2020	G Payne	Staff changes /include reference documentation (Clause 8.0) / include reference to stormwater drain marking and stormwater drainage diagram / Updated DG Manifest (Safe work NSW 27/04/2020)
15	Dec 2021	K Baker	Staff Changes & Annual Review
16	April 2022	G Payne	Update to include Operations Information below
17	March 2023	K. Baker/C. Cause	Personnel & Title changes

OPERATIONS INFORMATION

Occupier:	Pascoe's Pty Ltd
Address of Premises:	40-46 Fairfield Street, Fairfield East. 2165
Entry:	Open at 0530 MON-FRI Close at 1430 East side 1900 West side MON-FRI. Closed on SAT-SUN
Council:	Fairfield City Council
Phone Number:	02 8889 4730
Nearest Cross Street/Road:	Donald Street
Nature of Site:	Warehouse & Factory
Business Activities:	Manufacture of aerosol and liquid-based consumer products within the household and industrial chemicals category. Products include cleaning, pesticides, air care personal care, and aerosol-based food products.
DG Manifest:	Refer Appendix 1

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1.0 PURPOSE

This plan, in line with PACT Group's Emergency Response procedure, provides for Emergency Responses and the management of pollution incidents that may occur at Pascoe's Pty Ltd at 40-46 Fairfield Street, Fairfield East, NSW, 2165, with particular focus on those issues that could emanate from storage and handling of environmental harmful goods on site. The objectives of this plan, in the event of an emergency, are:

1. To protect people, including staff, neighbour's, and emergency response crews.
2. To stabilise any emergency situations.
3. To minimise damage to people, property, and the environment.
4. To make available an Emergency Plan for Dangerous Goods as detailed in Chapter 3, Division 4 of the WHS Regulation 2017.
5. To provide a mechanism to notify key personnel, neighbours, and emergency services
6. To make available adequate information to staff and emergency services of the nature of operations on this site and the potential hazards contained within. .
7. To deploy evacuation procedures.
8. To help prevent future emergencies.
9. To enable staff to deal safely with the identified emergencies.

2.0 DEFINITIONS

SES	State Emergency Services
PPE	Personnel Protective Equipment
EPA	Environmental Protection Authority NSW
POELA	Protection of the Environment Legislation Amendment Act 2011
POEO	Protection of the Environment Operations Act
DG's	Dangerous Goods as per DG License NDG005240
OEH	Office of Environment & Heritage
DPE	Department of Planning & Environment
FOC	Facility Operations Centre
WHS	Workplace Health & Safety
SDS	Safety Data Sheet

2.1 Pollution Incident Definition (NSW EPA guidelines & POEO Act)

Pollution Incident means an incident or set of circumstances during or as a consequence of which there 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 likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of in premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

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

Industry is now required to report pollution incidents *immediately* to the EPA, NSW Health, Fire & Rescue NSW, Workcover NSW and the local council. Immediately means prompt and without delay.

3.0 RESPONSIBILITIES

It is the responsibility of all personnel on the premise to report incidents and take appropriate actions in accordance with this Plan.

Position	**Responsibility**	**Delegated to (if not on site)**
Engineering Supervisor/Mgr- Sydney	Facility Emergency Controller/Chief Warden	Deputy Warden
Operations Manager	Deputy Warden/Office Area Warden	Office Staff
Engineering Supervisor	Maintenance Area Warden	Maintenance Staff
Regulatory Affairs Manager	Laboratory Area Warden	Laboratory Staff
Compounding Supervisor	Compounding Area Warden	Compounding Staff
Warehouse Manager	Warehouse Area Warden	Warehouse Staff
Production Supervisor	Factory Floor Area Warden	Production Supervisor 2

The responsibility may be delegated to another person on site when the nominated person is unavailable.

Facility Emergency Controller / Chief Warden

- Overall responsibility for management of onsite emergency
- Coordination and management of on-site emergency resources
- Ensures all infrastructure and training is in place to adequately deal with any emergencies and to prevent future emergencies
- Inducts employees and visitors on the requirements of this plan
- Ensures all incidents are logged.
- Ascertains the nature and location of the emergency.
- Liaison with external parties, including the media
- Maintains a log of events.

Deputy Warden

- Assists the Facility Emergency Controller / Chief Warden to ensure sufficient personnel, equipment and time are available for control of emergencies and mobilisation of additional resources, where required.
- Acts as Chief Warden backup when Chief Warden is not present
- Assists persons with disabilities.
- Liaises with Area Wardens to ascertain all personnel are accounted for
- Advise Chief Warden of head count status and any missing staff and locations
- Advises external emergency personnel of missing person/s

Area Wardens

- If at all possible, take safe and reasonable immediate actions to put out minor fires while at all times using extreme personal care.
- Send staff member to advise other marshals and Chief Warden
- At Evacuation Alarm ensures that staff in area leave immediately in an orderly fashion by the closest and safest exit and ensure staff DO NOT collect personal belongings from change areas.
- Check your area for remaining staff – ensuring your own safety whilst conducting check
- Ensure staff leave in an orderly fashion and minimise panic and running.
- Direct area staff to designated assembly point
- Ensures all personnel remain at assembly point until instructed otherwise.
- Conduct head count in assembly area and establish missing persons.

- Advise Deputy Warden of head count results and missing persons and last location.

First-Aid Officers

- Collect portable first-aid kit or emergency first-aid kit if safe to do so.
- Report to the Deputy Chief Warden
- If injuries are sustained by persons, attend to casualties as they become apparent – follow emergency casualty procedures DRSABCD *(Danger, Response, Send, Breathing, CPR, Defibrillation)* record vital signs and name.
- Liaise with Ambulance Services upon their arrival.

Maintenance Supervisor

- After consultation with the Chief Warden, ensure the power, gas and air to affected area is isolated.
- Investigate the reason for the alarm sounding, where it is thought that this is due to an electrical fault in the system or due to damage caused to pipework.
- Notify Senior Management and Chief Warden the results of any fire alarm investigation, and where directed by them, will disable the alarm.
- Arrange for an emergency crew of fitters, forklift operators and electricians to be available as requested by the emergency service in attendance.
- After the emergency bring the plant back to operational standard.

4.0 EMERGENCY RESPONSE

Various classes of dangerous goods stored on site are harmful to the environment. Different hazards are associated with storage and handling of the various classes of dangerous goods.

- Appendix 1 is a listing of the licensed dangerous goods that also identifies the broad hazard associated with the class of dangerous goods.
- Appendix 2 is a listing of the Potential Environmental pollutants, that includes the Hazardous & Dangerous Goods Register &/or Schedule Poisons.

4.1 INTERNAL EMERGENCY CONTACT NUMBERS

EMERGENCY TELEPHONE:	**1800 242 176 (24Hr)**
Shane Roberts Operations Manager	Bus: 02 9757 6317 Mob: 0417 206 391
Chris Cause Engineering Supervisor	Bus: 02 8889 4747 Mob: 0400 695 865
Gaynor Daniels HSES Advisor	Bus: 02 8889 4738 Mob: 0408 607 417

4.2 EXTERNAL EMERGENCY CONTACT NUMBERS

Fire and Rescue	000 - Yennora 02 9632 2846
Fire Department	000 - Fairfield 02 9726 1139
Ambulance	000
Police	000 - Fairfield 02 9728 8399

Pollution Incident – Follow order listed NSW EPA	a) Dial 000 (if major incident) b) EPA NSW → 131 555 c) Fairfield Council → (02) 9725 0222 d) SafeWork NSW → 13 10 50 e) Fire and Rescue NSW 000
Waste Removal Company (Cleanaway Glendenning ERS Liquid Waste Depot)	9839 1522

4.3 NEIGHBOUR CONTACT NUMBERS

Name / Organisation	**Address / Location**	**Telephone Number**
A1 Express Car Removal Pty Ltd	Western side	0488 847 247
So Fresh Cafe	In front	9681 7141
Speedway Garage	In front	9681 5105
Tu's Auto Repairs	In front	9681 7074
Alpha Radiators	In front	9681 7079
Western Mufflers	In front	9681 2899
Abraci	Eastern side	9721 2597
Komatsu	South Western	1300 566 287
Saraya Wreckers	South / Behind	9755 5577
New Steel Solutions	South Eastern / Behind	9071 9966

4.4 FACILITY OPERATIONS CENTRE (FOC)

The lower NE front office open area is designated as FOC *(Facility Operations Centre)* for use by key personnel for co-ordinating the company's emergency response activities.

- A copy of the Emergency Plan is kept at the Fire Alarm Panel
- Telephones are available.
- The Site Fire Alarm Panel is located with close proximity to this area

4.5 ALARM INITIATION

The alarm is initiated by ANY employee or Area Warden on witnessing an event that would result in Harm to PEOPLE, PROPERTY or the ENVIRONMENT or the activation of the automatic Alarm.

Manual alarm activation can be initiated after advising the Engineering Supervisor by activating the SITE EVACUATION AND FIRE FIGHTING PANEL BUTTON in the front lower FOYER AREA.

The person who initiates the alarm shall notify the Engineering Supervisor / Chief Warden when he arrives at the FOC (Facility Operations Centre) front lower office area, stating:

1. What is the nature of the emergency?
2. Where is the incident occurring?
3. What immediate assistance is required, e.g. Spill response, first aid, ambulance, etc

At the initial alarm activation, AREA WARDENS or nominees are to directly move to the FOC and report on their area's status and await directions by the CHIEF WARDEN as to confirmations required or evacuation procedures initiated.

If an Area Warden has commenced their area's evacuation, this action MUST be reported to the Chief Warden directly or through a nominee at the same time. DO NOT just leave the site unless you are at immediate risk.

NOTE: Initial Actions Are Extremely Important.
A small fire may readily be put out by IMMEDIATE action. If the same small fire is left for 2 minutes, it can become a major blaze and consume the factory.

It is the Area Wardens responsibility to coordinate initial local response actions, while at the same time ensuring that they or other staff are NOT PUT AT RISK. This is a judgement call, but
at ALL times personal and other staff's safety, outweighs property loss.

NOTE: in case of any major spill-
the Storm Water Isolation Valves must be closed - as a first action

Refer SDS for specific PPE requirements.

4.6 PERSONAL PROTECTIVE EQUIPMENT

The following PPE is available on site:

- High Visibility vests
- Dusk masks
- Full face masks with chemical canisters as required
- Eye Protection
- Full face visors
- Gloves/Nitrile
- Aprons
- Fume Extraction – lab & gassing rooms
- Safety Showers
- Disposable Overalls
- Welding Masks
- Impervious Rubber Gum Boots
- Hair Nets

4.7 ACID SPILL (DG Class 8)

Acidic dangerous goods are a type of Class 8 dangerous goods in Appendix 1. Acid is corrosive and a spillage could pose danger to people and property. Unless contained, it could also contaminate the environment.

The following PPE should be used when attending to acid spills: ONLY IF SAFE TO DO SO

- Safety glasses, goggles or face shield
- Breathing apparatus
- Rubber Gum Boots
- Rubber gloves
- Tyvek Overalls

Minor spills should be cleaned up by the person(s) responsible for the spill, using the Spill-Kit provided. Cleaned up material is to be disposed of at the designated bin for removal by contract external waste.

Complete Incident Report in VELOCITY.

4.7.1 Major spill

In the unlikely situation of a larger spill, the procedure is as follows:

1. If it's outside, **the Storm Water Isolation Valves must be closed - as a first action**
2. Notify the Engineering Supervisor
3. Supervisors/ Leading hands to take control, ensure all staff involved in the emergency wear the designated PPE, as per SDS.
4. Keep all people away and upwind.
5. If any staff is burnt, as a 1st instance wash the affected area under running tap water or emergency shower immediately and keep the water running. Call for medical assistance/ Doctor as necessary.
6. Bund the spill area. ONLY IF SAFE TO DO SO
7. Once bunded, ensure appropriate PPE is worn before attempting to clean up, then add **Dense Soda Ash to neutralise the acid,** located on spill kits, and or in the powder racks in the compounding area – **code 3073794**
8. Area Supervisor to organise the clean-up of the spill area. Consult the appropriate SDS.

Complete Incident Report in VELOCITY.

4.8 CAUSTIC/ALKALI SPILL (DG Class 8)

Caustic/alkali dangerous goods are a Dangerous Good Class 8, are corrosive and a spill could pose danger to people and property.
Unless contained, it could also contaminate the environment.

There are two types of caustic/alkali dangerous goods, solids and liquids.

The following PPE should be used when attending to caustic/alkali spills: ONLY IF SAFE TO DO SO

- Safety glasses, goggles or face shield
- Breathing apparatus
- Rubber Gum Boots
- Rubber gloves

Minor spills of either solid or liquid dangerous goods should be cleaned up by the person(s) responsible for the spill, using the Spill-Kit provided. Cleaned up material is to be disposed of at the designated bin/ container for removal by a Licenced external waste management operation.

Complete Incident Report in VELOCITY.

4.8.1 Major Spill

Solids spill

1. Supervisor/leading hand, working in the area, to make sure all people in the vicinity are safe, close the gates and keep all people away and upwind.
2. Inform Engineering Supervisor
3. Production Supervisor to take control and make sure that all staff involved in the emergency wears the designated PPE.
4. Bund area to contain the spill and recover the product.
5. If spill cannot be contained, **close storm water gates immediately**. The Engineering Supervisor will notify the Authorities as required
6. After the emergency the Warehouse Manager to arrange for waste to be treated or for the waste disposal contractor (Cleanaway) to collect and dispose of the waste

Liquid Spill

1. Supervisor/leading hand, working in the area, to make sure all people in the vicinity are safe, close the gates and keep all people away and upwind.
2. Inform Engineering Supervisor
3. Production Supervisor to take control and make sure that all staff involved in the emergency wears the designated PPE.
4. Bund area to contain the spill and recover the product.
5. If spill cannot be contained, **close storm water gates immediately**. The Engineering Supervisor will notify the Authorities as required
6. After the emergency the Warehouse Manager to arrange for waste to be treated or for the waste disposal contractor (Cleanaway) to collect and dispose of the waste

Complete Incident Report in VELOCITY.

*NOTE: In the event of a major spill, **the storm water isolation valves must be closed first**.*
All storm water drains, and sumps are individually fitted with a valve. Any liquid in the storm water drains and sumps is to have a sample analysed and determined as acceptable before discharge. The valves and the main storm water valve are only to be opened when authorised to do so by the Engineering Supervisor.

4.9 CHEMICAL SPILLS

Appendix 2 lists the extensive number of materials classified as Hazardous and or Dangerous on this site. However, all materials stored on site need to be regarded as potential pollutants if it were to escape the confines of our site and enter the storm water or sewerage systems.

All chemical spills are to be treated with CAUTION until identified. DO NOT breath vapours or allow skin contact. Immediately contact the area Supervisor and Engineering Supervisor.

4.9.1 Small Localised Spills

Minor spills of any chemicals must be cleaned up immediately by the person(s) responsible for the spill, using the Spill-Kit provided. Cleaned up material is to be disposed of at the designated bin/ container for removal by contract external waste manager.

Complete Incident Report in VELOCITY.

4.9.2 Major Spills

1. Supervisor/leading hand, working in the area, to make sure all people in the vicinity are safe, close the gates and keep all people away and upwind.
2. Inform Engineering Supervisor
3. Production Supervisor to take control and make sure that all staff involved in the emergency wears the designated PPE.
4. Bund area to contain the spill and recover the product. ONLY IF SAFE TO DO SO
5. If spill cannot be contained, **close storm water gates immediately**. The Engineering Supervisor will notify the Authorities as required.
6. After the emergency the Warehouse Manager to arrange for waste to be treated or for the waste disposal contractor (Cleanaway) to collect and dispose of the waste

Complete Incident Report in VELOCITY.

*NOTE: In the event of a major spill, **the storm water isolation valves must be closed first.***
All storm water drains, and sumps are individually fitted with a valve. Any liquid in the storm water drains and sumps is to have a sample analysed and determined as acceptable before discharge. The valves and the main storm water valve are only to be opened when authorised to do so by the Engineering Supervisor.

4.10 FIRE (Class 2.1and 3 on the site)

Classes 2.1 and 3 are dangerous goods that can exacerbate a fire, if an incident were to occur.

- Class 2.1 are flammable gases
- Class 3 are flammable liquid.

4.10.1Small Fire

If safe to do so, put out the fire using portable DryChem or CO_2 fire extinguisher.

Complete Incident Report in VELOCITY.

4.10.2 Major Fire

If small fire cannot be contained or a major fire occurs, the emergency should be handled as follows:

1. Refer to points 4.4 – 4.6 of this document _ HUMAN LIFE 1ST
2. Notify the Engineering Supervisor who, upon confirming the situation, will immediately initiate the evacuation procedure. This is especially so, when the fire is out of control or the fire involves dangerous goods which requires assessment for evacuation as highlighted in the Dangerous Good Register in Appendix 1, e.g. toxic Class 6.1.
3. The Engineering Supervisor to make sure all people in the vicinity are safe, close the gates and keep all people away and upwind.
4. The Production Supervisor to take control and make sure all staff involved in the emergency wear protective clothing. Note: some of the flammable dangerous goods have toxic properties
5. Follow the 4.2 EMERGENCY CONTACT NUMBERS.
6. Contact Police for traffic and crowd control.
7. Notify immediate neighbours (see 4.3) of the fire and keep them advised of the incident. Assess the situation for potential off-site impact. If confirmed, notify neighbours to commence their evacuation procedure. The decision to evacuate may be necessary and should be the decision of the neighbours unless advised otherwise.
8. After the emergency, the Warehouse Manager is to arrange for treatment and disposal of the waste with the contracted external party.

NOTE: ***In the event of a major water run off event, the storm water isolation valves must be closed.*** *All storm water drains and sumps are individually fitted with a valve. Any liquid in the storm water drains and sumps is to have a sample analysed and determined as acceptable BEFORE DISCHARGE. The valves and main storm water valve are only to be opened when authorised to do so by the Engineering Supervisor.*

4.11 WASTE WATERS, STORM WATER AND FIRE DELUGE RUN OFF

The site can generate waste waters from the following areas that need to be contained as routine wastewaters and exceptional event run off's that could result in pollutants entering the stormwater or sewerage systems.

- Internally generated waste for treatment or disposal
- Storm water – contaminated
- Fire deluge system containment
- On site waste for Licensed Contractor removal

4.11.1 Internally Generated Waste for On Site Treatment or Disposal

Waste from this site is collected through a designated clean or for treatment waste system to an on-site DAF unit registered with Sydney Water license Consent to Discharge No. 34973. The system is tested in accordance with the Sydney Water sampling Plan.

Untreated waste is stored in a bunded DAF treatment area in an underground tank. The likelihood of this material entering the storm water system untreated is low, as the bunded area is 200% the size of the storage facility. Any overflows could be contained by closing the site stormwater system and containing the overflow on site.

Untreated or poorly treated waste could enter the sewerage system if the monitoring of the DAF system's effectiveness was not maintained. Only staff trained in the operation of the DAF system are allowed to process waste. Regular and random samples are taken for testing to meet Sydney Water requirements every 60 Days, as per Trade Waste agreement.

4.11.2 Storm Water – Contaminated Run Off Containment

Storm water from the driveway areas is by default directed to the stormwater drains on site.

All external stormwater drains on site are painted in BLUE for easy identification.

Each outlet to the external storm water system has an automatic and manual closure system in the event of a spill or contaminated storm water. The Engineering & Warehouse staff members are trained in the operation of these closure systems and the requirement for waste checking prior to opening, especially in the event of a yard spill. Contaminated stormwater is to be collected and put into the DAF water tank for treatment as wastewater.

4.11.3 On Site Waste Removal Containment

During the transfer of liquid and solid waste to the contractor's tanks, there is a potential for spills. These activities take place in the front driveway area and as a result spill can be contained by the closing of the storm water activation controls and by the use of local bunding.

4.11.4 Fire Deluge System – Run Off Containment

In the event of the automatic activation of the Fire Deluge System, large quantities of firefighting water will be released and contained by the internal storage system. It is important at this time, the storm water isolation valves are closed & the alarm automatically run on battery backup.

NOTE: ***In the event of a major water run off event, the storm water isolation valves must be closed.*** *All storm water drains, and sumps are individually fitted with a valve. Any liquid in the storm water drains and sumps is to have a sample analysed and determined as acceptable BEFORE DISCHARGE. The valves and main storm water valve are only to be opened when authorised to do so by the Engineering Supervisor.*

4.12 GAS RELEASES (Class 2.1 and 2.2)

As this site is an aerosol filling facility, there are a number of flammable and non-flammable pressurised gasses on site that present a significant risk if uncontrolled releases occur.

The LPG underground B45 gas is protected by gas detection systems with multiple automatic shutoffs in the event that gas sensors within the building (and at the tank sites) detect gas quantities that meet the LEL (Lower Explosive Limit) detection level. This is accompanied by an urgent beeping from the gas detection unit. Extraction fans operate in the gassing rooms, but persistent alarm activation outside will require immediate investigation.

Adjacent to the Electrical workshop is the Site SCADA information Panel, that is interlocked with the Gas Detection Panels throughout the plant eg A2 (West wall), Goods Receiving (rear of office), A5 (North wall) & A1 Case Packer.

This screen shows the value (in %LEL) of each Gas detector on site.

Where the Executive action requires the Site Evacuation, the Fire Warden's responsibility is to identify the location and validity of the threat and if necessary, manually activate the alarm and initiate the Site Evacuation. The Fire Warden may also need to alert the Fire Brigade of the nature of the threat.
If alarms cannot be RESET, this indicates significant gas escaping and the potential for fire and or explosion. The site should be EVACUATED until the alarm activation issue is resolved.

On very hot summer days, the Gas Sieves may vent from the top – this is an in-built safety feature.

CAUTION: Any gas releases pose a SERIOUS risk to staff for the following:

1. Flammable fire and / or explosion
2. Asphyxiation in confined spaces, particularly Carbon Dioxide
3. Extreme chilling burn potential for skin contact

GAS TYPES & DG Classification

- **Unodourised LPG B45 Underground Tank** **Class 2.1 (Flammable)**
- **Carbon Dioxide (CO_2) cylinders** **Class 2.2 (Non-Flammable)**
- **Nitrogen (N) cylinders** **Class 2.2 (Non-Flammable)**

4.13 POWER OUTAGE/FAILURE

As Pascoe's business is primarily Aerosols at Fairfield *(an enclosed metal cylinder containing propellants at High pressure)*, if an Aerosol can remain at high temperature, the chances of an explosions is almost certain, that expands at a rate of 270x the can volume.

For this reason, if Power were to go down, an Aerosol can either remain submerged at 55-60^{0}C in Hot Waterbath water or located in front of a Shrink Labelling Heat Gun, at any given time, both of which can cause can/s to rupture if not removed.

Therefore, if the early / pre-evacuation warning Alarm sounds, any Aerosol either in the Hot Waterbath or Infront of a Hot Air Gun, are to be removed from the heat source, prior to the 2nd Alarm sounding ie the Evacuation Siren.

If there is little time to manually remove the cans, esp when in a Hot Waterbath, the Aerosol cans in a Peg Bath (A3) can be hydraulically/automatically gang lifted out of the hot water & out of danger.

For Aerosol Lines A1, the Emergency Hot Water Dump can be activated, leaving the cans high & dry, while still stationed on the magnetic conveyers.

For Aerosol Lines A2 & A5, the conveyers progress until all submerged cans in the Hot Waterbath emerge, leaving the cans high & dry, while still stationed on the magnetic conveyers.

When the power is re-instated, the Temperature of the new/refilled water in the Hot Waterbath must be re-equilibrated to between 55-60^{0}C, before the production line can commence running.

Those cans removed from the Heat Gun shrink labeller, can be inspected visually for label integrity before either placing in front or behind the heat gun, depending upon the label's status.

4.14 MALICIOUS THREAT

Malicious threat includes bomb or chemical/biological threat. If located in dangerous goods storage area, it could cause the incident to escalate to a more serious situation.

Malicious threat is likely to be received over the phone.

If you received a threat (e.g. bomb or other malicious type):
DO NOT HANG UP, even after the call is terminated, as this will allow the call to be traced.

1. Stay calm and talk normally with the caller.
2. Take down as much information as you can
   - What is it?
   - Where is it?
   - When will it go off?
   - What does it look like?
   - Voice (man/woman, accent, slurring, etc)
   - Background noise (music, traffic, etc)
   - Date and time of call
3. Report calls to the Engineering Supervisor immediately, who will
   - order a site evacuation as necessary &
   - Notify the Police.

4.15 EARTHQUAKE/TREMOR

In the unlikely event of an earthquake/tremor, care must be taken to ensure the stored dangerous goods have not been affected. Spillage and fire associated with the dangerous goods are to be treated in accordance with the above procedures.

4.16 EMERGENCY EVACUATION PROCEDURE

The Engineering Supervisor shall assess the emergency and if necessary, order an evacuation, particularly if staff or public safety is at risk. This shall be done by sounding the fire alarm.
NB:Fire Brigade or other responsible agency may also order an evacuation.

Upon being advised to evacuate, site personnel shall move to the assembly area (see Appendix 3a: Site Map) via the safest route.

The normal assembly area is just inside the site exit gate, (NW corner of site).

An alternate area is on Fairfield Street, or Knights Park, ONLY IF SAFE TO DO SO

Those personnel responsible for the site Entry/Exit Gates, shall close the gates & remain there for further instruction from the Chief or Deputy Warden.

Team Leaders shall bring the First Aid Kit, to be set up at the assembly area, if needed.

The Visitor's book shall be collected on the way out & those visitors/contractors still on site, are to be escorted safely to the Assembly Area by their overseer.

A head count shall be conducted at the assembly area, by the Area Wardens, that is reported to the Deputy Warden for assessment, before passing the final numbers to the Chief Warden.

All site personnel are to remain in their groups. No Smoking or Mobile Phone use is permitted.
NB: Mobile Phone use is permitted, by only those Authorised during the emergency evacuation.

Once the situation, that caused the evacuation, has been fully assessed by the Chief Warden *(Engineering Supervisor)* and is deemed safe, a debrief shall be given to the staff before they're permitted to return to their workstations.

4.17 NOTIFICATION OF AUTHORITIES

The Engineering Supervisor is to contact Emergency Services and advise the following details based on response numbers and sequences listed at point 4.2.

- Nature of emergency - spill, fire, etc.
- Specific chemicals involved in the spill, fire, etc.
- State location and have Site Plan and Emergency Plan available.
- Seek advice on evacuation, blocking drains, closing roads, etc.

5.0 TERMINATION OF EMERGENCY & DEBRIEF

To be conducted by the Engineering Supervisor when the incident is considered under control. The Chief Warden shall turn off the fire alarm to indicate the all clear.

Debrief with involved emergency response parties is to include:

1. Investigating the lead up to the incident
2. Discussion on effectiveness of emergency actions
3. Discussion on any possible contamination
4. Discussion on allocation of costs and funding coverage
5. Recommendations to be put in place
6. Inform the relevant bodies listed at point 4.2 and submit an incident report, if requested.

6.0 INCIDENT REPORTING & INVESTIGATION

All incidents must be reported to the Engineering Supervisor or his delegate who shall conduct an incident investigation. Outcome of the investigation shall be communicated to the workforce, HSES Advisor, as well as PACT Group Management.

For major incidents or action relating to the spill, the Engineering Supervisor or his delegate shall inform the duty officer of EPA, who may request a written report.

7.0 EXERCISES, TRAINING AND REVIEW

7.1 TRAINING PROGRAM

Pascoe's will ensure that operations personnel are trained in use of the first aid kit, spill kit, personnel protective equipment and responding to the identified emergencies.

For staff likely to be involved with or affected by this Emergency Plan, they are:

1. Issued with a copy of Emergency Plan and subsequent updates.
2. Taught to identify hazardous areas, adopt safe procedures, location of portable fire extinguishers.
3. Staff using Dangerous or Hazardous goods will receive training in this area re the products, their use and safe handling and storage practices
4. Wardens will participate in 12 monthly externally arranged fire & hazards training
5. To participate in scheduled Evacuation Alarm drills initiated by actuating any of the siren triggers on the Control panel at the foyer.
6. Assign the roles of Facility Emergency Controller, Chief Warden, Deputy Warden and Area Wardens
7. To participate in Evacuation Drills.
8. Internal audits and corrective actions include sections specifically monitoring risks – Statutory, Water Systems, Process Safety, Gas Safety and Dangerous Goods
9. Hard Copy training records to be kept by the HSES Advisor (Sydney) and to include:
    - The manner in which testing was conducted and maintained.
    - The dates on which they have been Trained.
    - The names of staff members who carried out the training.
    - The dates when updated.
    - Plans must be retested within one month of any pollution incident

7.2 EXERCISES

Documented Evacuation exercises to be carried out as decided by the HSES Advisor (Sydney) at MINIMUM annually, with records of the event kept for compliance purposes, for a minimum of 7 years.

7.3 REVIEW OF EMERGENCY PLAN

Once a year, or when requested due to change in circumstances.

7.4 RISK ANALYSIS

Has been risk assessed in conjunction with EPA. Site has been deemed to be "LOW" risk. Refer letter from EPA dated 10th June 2021 (attached – Appendix 8).

8.0 REFERENCES

- Planning for Emergencies in Facilities – Australian Standard (AS 3745-2010)
- WH&S Regulation Division 4 – Emergency Plans
- Code of Practice – Managing the work environment and facilities (August 2019)
- Australian Dangerous Goods Code Edition 7.8
- Classifying Hazardous Chemicals 2020
- Safe work Australia's Hazardous Chemical Information System (AICIS)
- Chemwatch Australia
- PACT – Emergency Response Procedure (PACT WHSE PRO 003.02)
- PACT – Hazardous Chemical Storage Procedure (PACT WHSE PRO 004.02)
- ERS Call Hierarchy Document
- Pascoes EPA Licence – in accordance with Protection of the Environment Legislation Amendment Act 2011
- Protection of the Environment Operations Act 1997
- Environmental Guidelines – Preparation of Pollution Incident Response Management Plans

APPENDIX 1: DANGEROUS GOODS MANIFEST (Refer to SDS for specific risks associated with the dangerous goods)

Storage ID	Storage Type	UN Number	Proper Shipping Name	Class/Division	Packing Group	Maximum Storage Capacity (Kg/L)
1A	Underground Tank	1075	PETROLEUM GASES LIQUIFIED	2.1	~	58000
1B	Underground Tank	1075	PETROLEUM GASES LIQUIFIED	2.1	~	58000
2A	Underground Tank	1170	ETHANOL (ETHYL ALCOHOL)	3	II	24000
2B	Underground Tank	1170	ETHANOL (ETHYL ALCOHOL)	3	II	24000
2C	Underground Tank	1268	PETROLEUM DISTILATES N.O. S	3	III	24000
2D	Underground Tank	1268	PETROLEUM DISTILATES N.O. S	3	III	24000
5	Roof Storage	1950	AEROSOLS	2	~	190,000
6	Roof Storage	1219	ISOPROPANOL (ISOPROPYL ALCOHOL)	3	II	28,800
6	Roof Storage	1170	ETHANOL (ETHYL ALCOHOL)	3	II	28,800
6	Roof Storage	2052	DIPENTENE	3	III	28,800
6	Roof Storage	1268	PETROLEUM DISTILATES N.O. S	3	III	28,800
7A	Roof Storage	1805	PHOSPHORIC ACID	8	III	25,000
7A	Roof Storage	3265	CORROSIVE LIQUID, Acidic, Organic NOS	8	III	25,000
7A	Roof Storage	2586	ALKYLSULPHONIC ACIDS, Liquid	8	iii	25,000

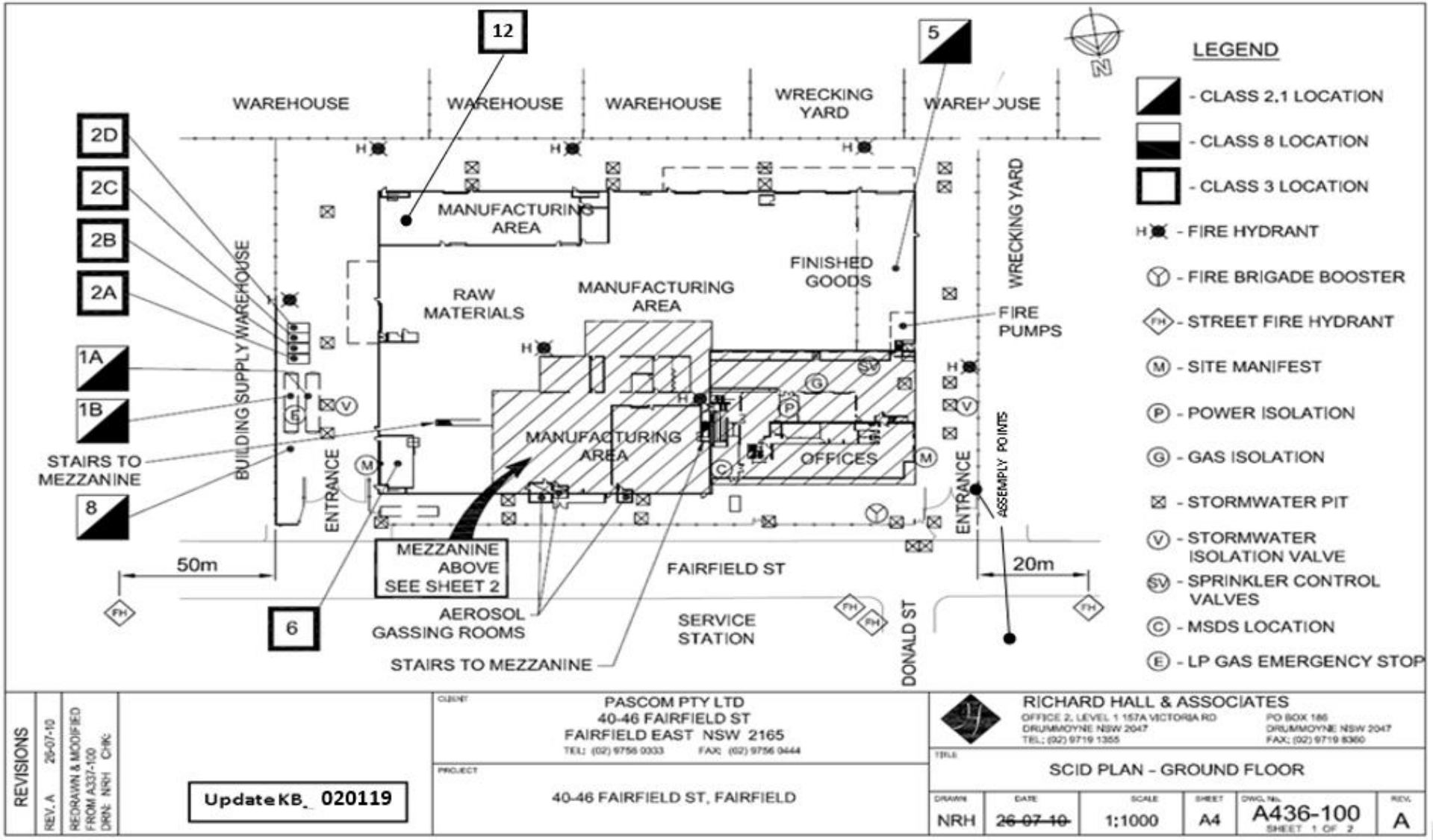
7B	Roof Storage	1824	SODIUM HYDROXIDE, Solution	8	II	8,000
7B	Roof Storage	1823	SODIUM HYDROXIDE, Solid	8	II	8,000
11	Roof Processing	1300	TURPENTINE SUBSTITUTE	3	III	20,000
11	Roof Processing	1268	NAPTHA (Petroleum), Hydrotreated Light	4	III	20,000
11	Roof Processing	1170	ETHANOL (ETHYL ALCOHOL)	3	II	20,000
11	Roof Processing	1268	PETROLEUM DISTILATES N.O. S	3	III	20,000
12	Roofed IBC Production Filling	1300, 1268, 1170	From Storage 1D 11	3	III	2,000

APPENDIX 2: INVENTORY OF POLLUTANTS (Hazardous and Dangerous Goods)

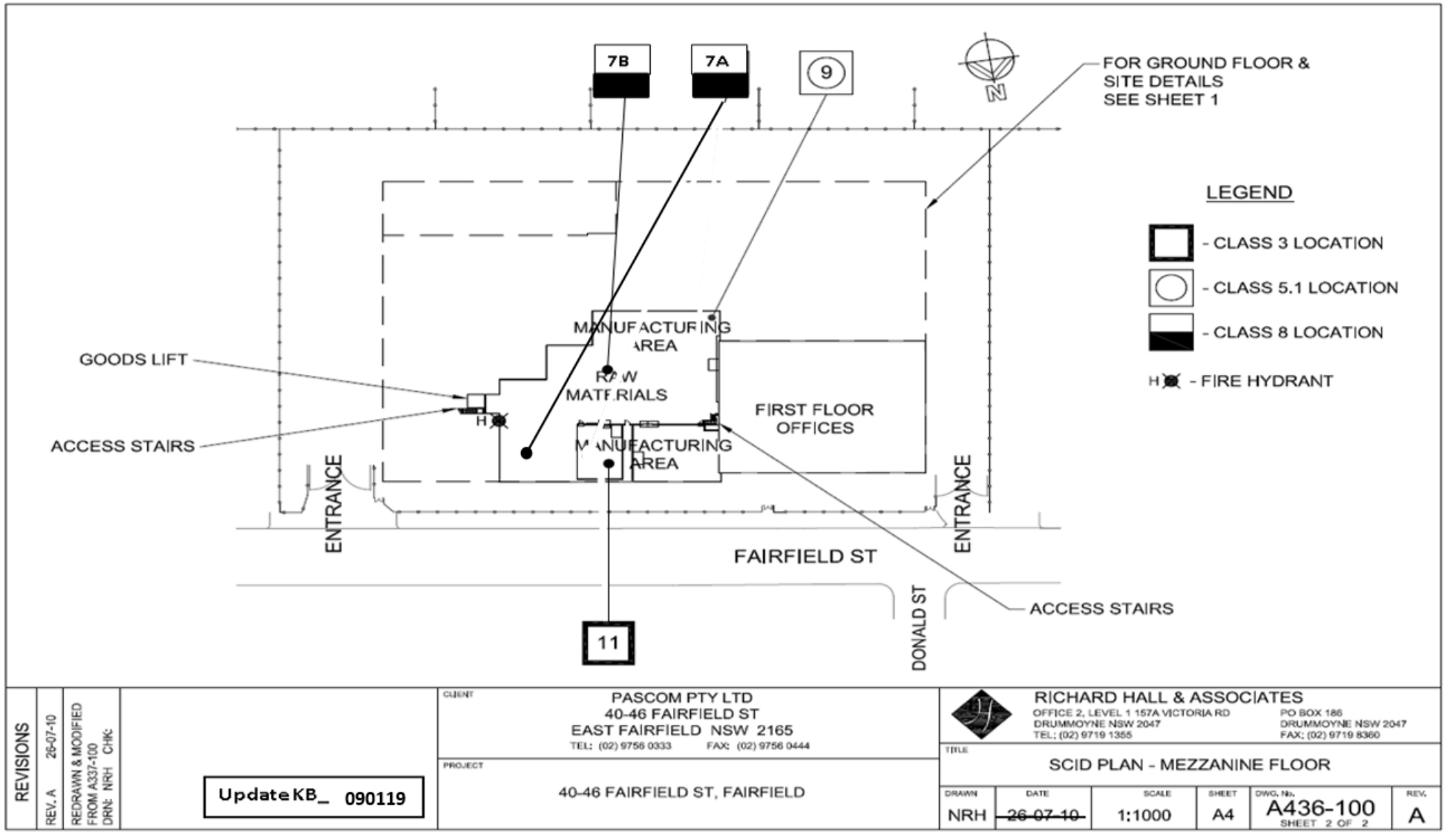
Item Code/s	Raw Material	DG Class	SCHEDULE POISON
3095323	Ammonia 25%	8	
3095476	Berol 266	NDG	
3095156	BHT (Butylated Hydroxy Toluene)	9	
470231	Carbon Dioxide gas	2.2	
3095332	Caustic Soda (Sodium Hydroxide)	8	S6
85951	Cypermethrin 90%	6.1	S6
3095175	Diethyltoluamide 98% (DEET)	C2	S5
3064281	d-Limonene	3	
3095453	Esi - Terge P-304	8	
85047/85046	Ethyl Alcohols - All	3	S5
85368	Exxsol D60	NDG	S5
3095236	Gardilene SSA/S (Labs Acid)	8	
3095276	Gardiquat BS/AU (CAB)	NDG	
3095486	HEPTANE (SHELL)	3	S5
3095246	Hydrogen Peroxide 50%CG	5.1	
85950	Imiprothrin 50%	9	
3095188	Isopar H	3	S5
3095195	Isopropyl Alcohol (IPA)	3	
3095464	Methanol	3	S6
3095176	MGK 264	9	
3095234	Monoethanolamine	8	
3095318	Morpholine	8	
85539	Neodol 25-3 (Polyoxethylene Lauryl ether)	9	
3069585	Neodol 91-8 (Alcohol Ethoxylate)	C2	
85014	Nitrogen	2.2	
3095180	Permethrin Tech 25:75	6.1	

500095	Piperonyl Butoxide	9	
85040	Propellant B45	2.1	
3095450	PROP.GLYCOL N BUTYL ETHER(PNB)	NDG	
85481	Pyrethrum 50% Natural	9	
3095270	Sodium Hydroxide 50%	8	
3095254	Sodium Metasilicate Pentahydrate	8	S5
3095218	Sodium Nitrite	5.1/6.1	S7
85985	Sumi Alpha Insecticide Conc.	9	S6
3095364	Surfadone LP-100	8	
3096816 , 3096816	TERIC 12A4	9	
3095266	Teric LA8N	9	
3095239	Triethanolamine 85%	C2	S5
3095479	Triethanolamine 99 LFG 85%	C1	S5
3095404	White Spirits	3	
3095398 , 3095398	XIAMETER 0347G EMULSION	NDG	
3095498	XIAMETER OFX-5211 FLUID/DC-Q2-5211	9	
85602	Xylene	3	S6

APPENDIX 3a: SITE MAP



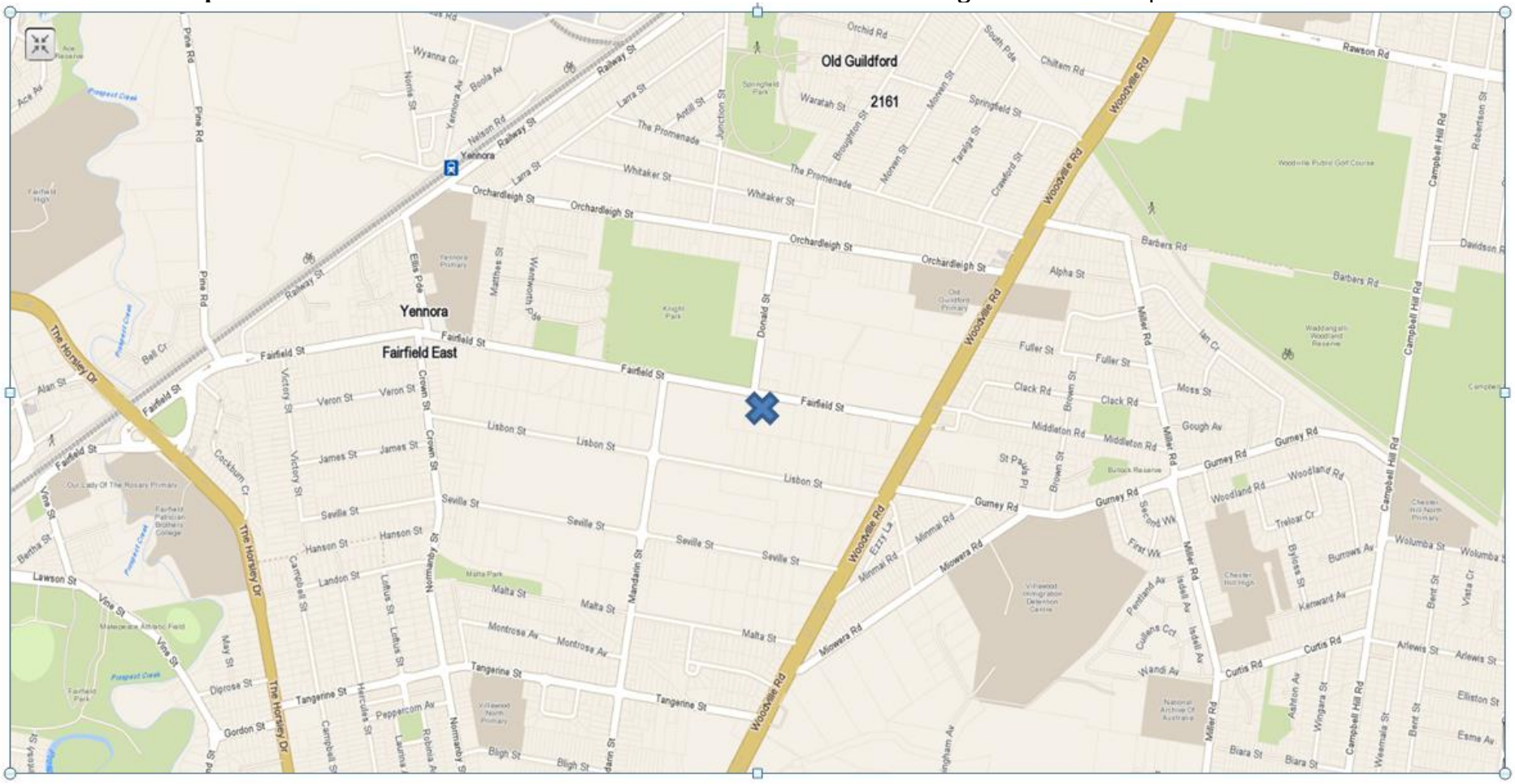
APPENDIX 3b SITE MAP



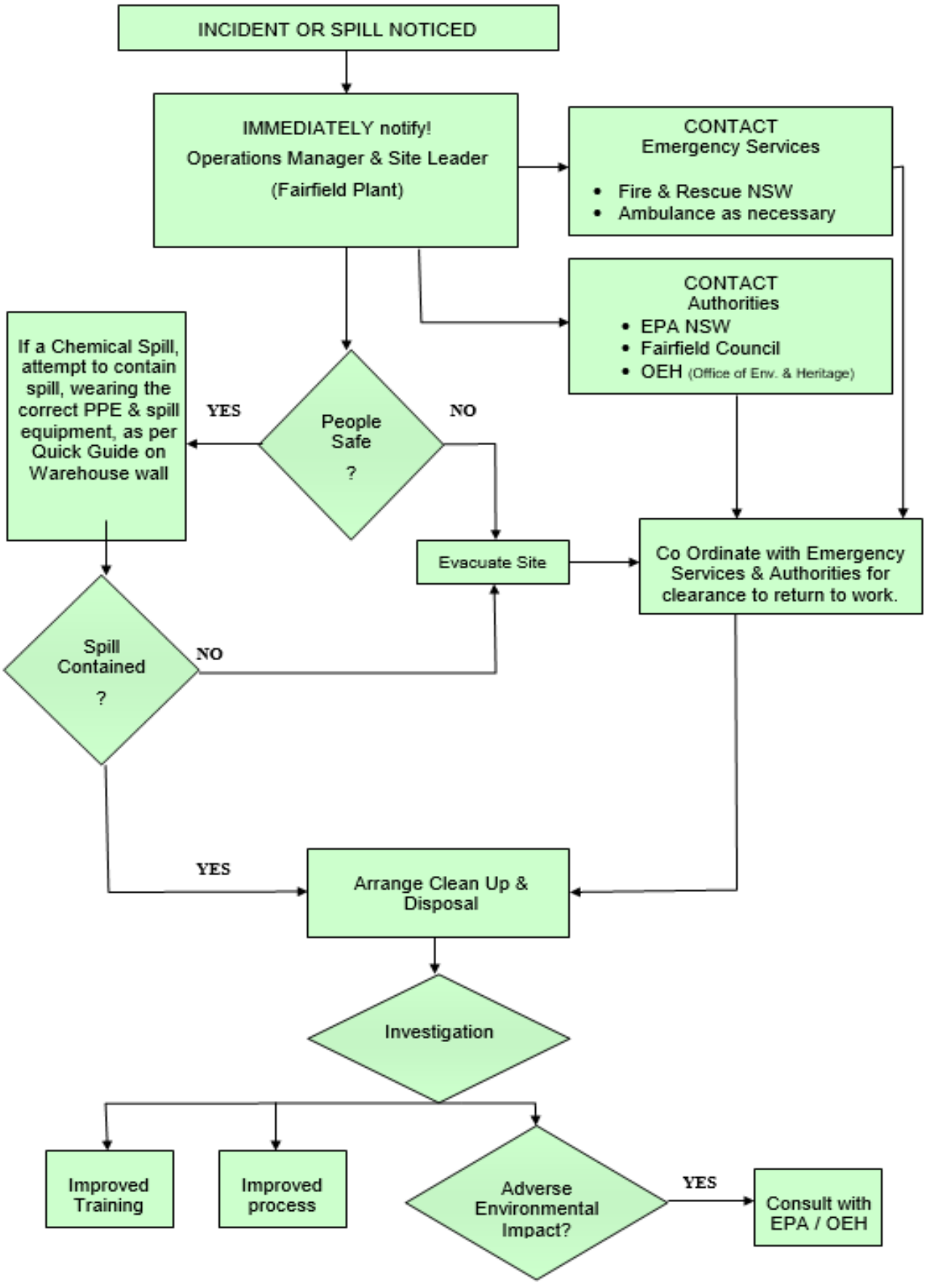
APPENDIX 3c LOCATION MAP – Pascoes

Address: 40-46 Fairfield Street, FAIRFIELD EAST NSW 2165

Marked as X in map centre **Storm Water Discharge Location:** Prospect Creek and Mandarin Street Drainage



APPENDIX 4: FLOW CHART: RESPONSE TO SPILL



APPENDIX 5: PASCOE'S SAFETY EQUIPMENT LIST

Equipment Description	Location
Main Evacuation & Fire Fighting Panel	Front Lower Foyer
Water Booster Controls	Underground Driveway – South Top
Brigade Tank Suction x 4 outlets	Underground Driveway – South Top
Fire Extinguishers	Numerous visible locations about the site
Wall Mounted Hose Reels	Numerous visible locations as per MDL list below
Fire Hydrants on Site	Numerous visible locations as per MDL list below
Fire Blankets	Upstairs & Downstairs Kitchen +Downstairs office
Town Gas On/Off - Boiler	Underground Driveway – North Top
Town Gas Meter - On/Off	Underground Driveway – South Top
Fire Doors	Numbered throughout the site
Ceiling Sprinklers	ESFR over Aerosols, normal roof deluge for the remainder
Emergency Information Container	Driveway In - East
Integrated Full Site Bunding	Carpark under Building is the site's Spill Containment
LPG & Gas Detection Safety System with Full LEL listing	• L1 SCADA panel – South Wall • **Appendix 6**
Fire Water Tanks (under dispatch)	Control is at the Top of Underground Driveway
Storm Water Isolation Controls x 2	East & West Sides of the Site
Spill Kits	Colour coded about the Site

MDL 6 Month Fire & Safety services listing *ATTACHED*:

APPENDIX 6: PASCOE'S LEL's *(C&E Master Rev.5 ATTACHED)*