



Pollution Incident Response Management Plan (PIRMP)

DGL Group Pty Ltd

EPL No: 20863

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1. INTRODUCTION

1.1. Facility Details

As defined in the site's Environmental Protection Licence No. 20863, the facility details are as follows:

Licensee:	DGL Group Pty Ltd
Address:	28-54 Percival Road, Smithfield NSW 2164
Licence Number:	20863

2. PURPOSE

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the *Protection of the Environment Operations Act 1997 (POEO Act)* and associated *Protection of the Environment Operations (General) Regulation 2022 – Chapter 4* for licensed facilities.

Under DGL's Emergency Response Plan, a detailed emergency response procedure is already in place for the classification and management of incidents that may occur on site. Under the provisions of Form of plan—the Act, s 153C, Chapter 4, 71B of the *Protection of the Environment Operations (General) (Pollution Incident Response Management Plans) Regulations 2022*, to allow for the integration of requirements into the existing plans in respect to pollution incident response, requirements under POEO legislation have been integrated into these existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans and associated procedures. It also details supplementary site-specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

3. SCOPE

This PIRMP covers DGL Smithfield operations. This plan applies to all activities, products, and services on the site over which DGL has operational control.

This site is covered by an Environmental Protection Licence (EPL) number 20863 for the scheduled activities as shown below:

Scheduled Activity	Fee Based Activity	Scale
Chemicals storage	General chemicals storage	> 100000 kL storage capacity
Resource recovery	Recovery of hazardous and other waste	Any hazardous and other waste recovered

4. PIRMP OBJECTIVES

The objectives of the PIRMP are to:

- Ensure timely and comprehensive communication about a pollution incident on site to all staff at the premises (and head office – Brisbane), the Environmental Protection Authority (EPA), other authorities and the community who may be affected by the impacts of the incident.
- Minimise and control the risk of a pollution incident at the site by identifying any environmental risks that are present and develop action plans to minimise and manage those identified risks.
- To ensure the plan is implemented by trained employees, identify and train employees responsible for its implementation and ensure the plan is regularly tested and modified as required to maintain effectiveness.

5. DESCRIPTION OF LIKELIHOOD AND HAZARDS

Overall hazards and risk for the site are determined through DGL's Risk Management Framework and reflected in its Risk Register.

5.1 Hazard and Risk Assessments

Assessing hazards and risk on a work task level, are managed through the Risk Assessment Procedure. This procedure identified hazards associated with a work task and develops solutions for each hazard that either eliminates or controls such hazards.

5.2 Evaluation Criteria and Risk Ratings

The qualitative measures are used to estimate the consequence or impact of an event, along with the estimate of likelihood, to produce consistent risk rankings across the identified risks. This process is defined in DGL's risk assessment procedure. An example of the risk matrix used is below.

		RISK MATRIX				
Consequences		Minor 1	Important 2	Serious 3	Major 4	Catastrophic 5
Likelihood						
A. Almost Certain		LOW	HIGH	HIGH	HIGH	HIGH
B. Likely		LOW	MEDIUM	HIGH	HIGH	HIGH
C. Possible		LOW	LOW	MEDIUM	HIGH	HIGH
D. Unlikely		LOW	LOW	LOW	MEDIUM	MEDIUM
E. Rare		LOW	LOW	LOW	LOW	MEDIUM

Note: For procedure/task to commence, the Risk Zone on the Risk Matrix must fall below indicated double black/white line.

Likelihood Legend		
Almost Certain	A	Is expected to occur
Likely	B	Good chance will occur
Possible	C	Might occur at some time
Unlikely	D	Remote chance of occurring
Rare	E	Not known to have occurred in the industry

Consequences legend (Note: based on potential consequence of incident)					
	Safety	Environmental	Food	Financial	Management Effort
Minor	1 First Aid	None	None	<\$1000	Impact absorbed through normal activity
Important	2 Medical Treatment	No significant change	Damage to Product	>\$1000 < \$5000	Impact absorbed with management effort
Serious	3 Lost Time Injury	Significant effect and contained	Contamination of Products	>\$5000 < \$10000	Significant Event but can be managed
Major	4 Permanent Disability	Significant effect not contained Medium Term	Contamination of other products	>\$10000 <\$50000	Significant Event but can be managed
Catastrophic	5 Fatality	Very significant effect not contained, long term	Contamination of manufactured product	\$50000 <	Potential collapse of business

Likelihood and Risks of a Pollution Incident

Risk	Likelihood x Consequence Risk Rating
Dangerous and/or hazardous materials spillage and discharge to storm water environment (including contaminate discharge)	C3

Preventative Controls
Work Permit Guidelines
Training, induction, and instruction
Control of ignition sources on site
Segregation of incompatible substances
Spill Drain Mats installed in loading/unloading areas
Spill fixed bunding in store and temporary bunding in place around doorways
Site Sluice valve training and procedures in place
Personal Protective Equipment

5.3 Site Hazards identified

- Release of customer product entering drainage system.
- Plant or equipment failure e.g., fuel or oil release.
- Fires and subsequent water entering drainage system.
- Uncontrolled reactions.
- Incompatible products coming into contact.

5.4 Hazards Identified

- During site audits and observations.
- Post incidents or events.
- Before new work procedures or new materials are introduced to the site.
- While site activities are being carried out.
- For transport and distribution activities, prior to leaving site.
- During carrying out site activities or processes.

6. LEGISLATIVE REQUIREMENTS

The specific legislative requirements for the development and implementation of this PIRMP are provided below:

- Chapter 5, Part 5.7A Protection of the Environment Operations Act 1997 (POEO Act)
- Chapter 4 of the Protection of the Environment Operations (General) Regulation 2022
- Environment Protection Licence EPL 20863

7. TERMS AND DEFINITIONS

7.1. Definition of a pollution incident

A 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 is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on a premises, but it does not include an incident or set of circumstances involving on the emission of any noise.

7.2. Abbreviations

EPA	Environmental Protection Authority
EPL	Environmental Protection Licence
PIRMP	Pollution Incident Response Management Plan
DGL	DGL Group Pty Ltd
POEO Act	Protection of the Environment Operations Act 1997
CLM Act	Contaminated Land Management Act 1997
ERP	Emergency Response Plan
EMS	Environmental Management System

8. NOTIFICATION OF A POLLUTION INCIDENT

8.1. What must be notified

A pollution incident is required to be immediately notified if there is a risk of “material harm to the environment”, 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 or an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as prescribed by the regulations), and
- (b) Loss includes the reasonable cost and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

8.2. Responsibility to notify

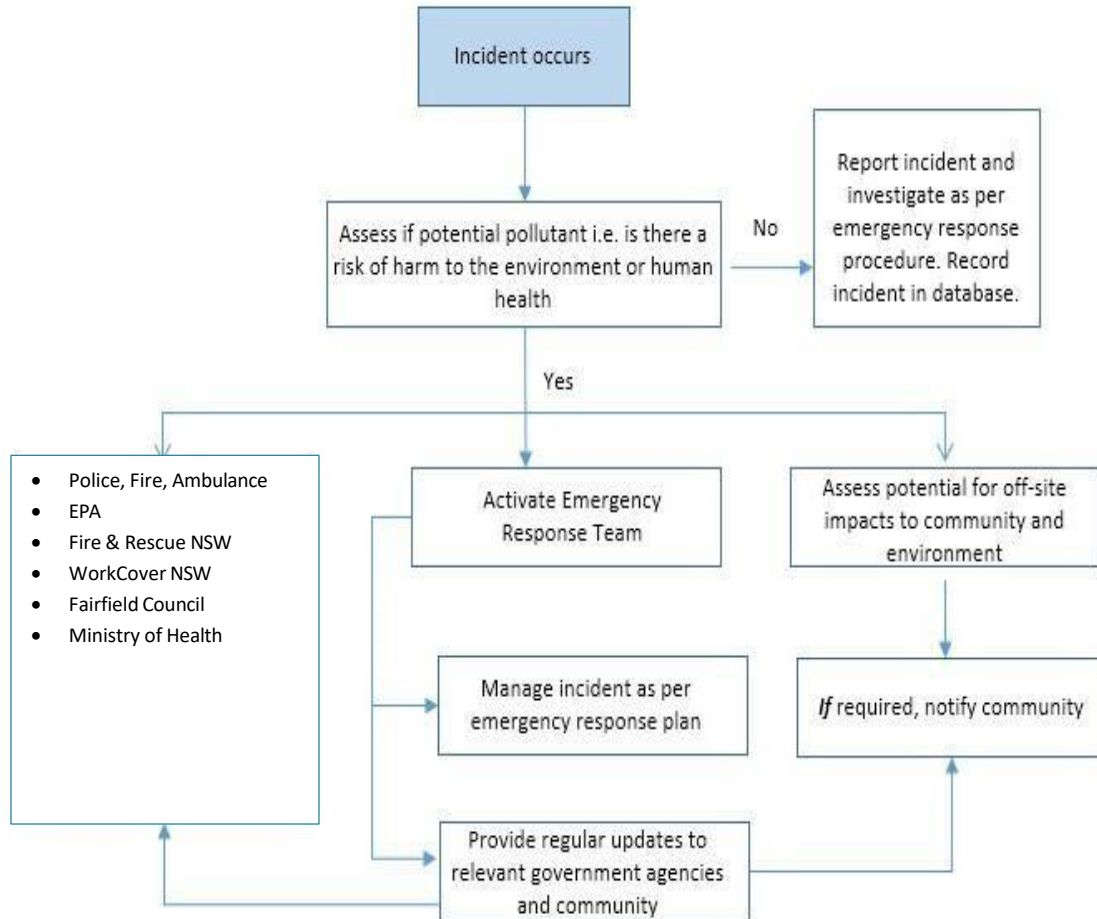
Under Section 148 of the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- The person carrying on the activity.
- An employee or agent carrying on the activity.
- An employer carrying on the activity.

- The occupier of the premises where the incident occurs.

Once determined that the incident causes or threatens harm to the environment, notification must be given immediately, i.e., promptly and without delay, after the person becomes aware of the incident. The chief warden is authorised to notify authorities as required.

8.3. Incident Response



Agency	Contact Number	Comments
Police, Fire, Ambulance	000	Call if immediate threat to human health or property and an initial combat agency is required. Emergency services are the first responders as they are responsible for controlling and containing incidents.
EPA	131 555	(24hrs)
Fire & Rescue NSW	1300 729 579	Do not call if 000 has already been contacted.
Safe Work NSW	131 050	02 9214 9220 (AH)
Fairfield Council	02 9725 0222	
Ministry of Health	02 9616 8111	Fairfield Hospital

8.4. On-site incident management

An emergency response plan is in place for the site. This plan outlines the actions required to be taken where there is an incident on site which may result in a material impact to human health and/or the environment. This procedure and this plan will be used in-conjunction with each other to ensure that the impacts of pollution incidents are minimised as much as possible through early intervention.

9. COMMUNICATION

9.1. Internal communications

During business hours, all incidents covered under this plan are to be notified to the Site Manager immediately.

Subsequent to this, incidents are to be reported to

- State Manager NSW
- GM Warehousing ANZ
- HSEQ Manager ANZ

The Senior Manager will then facilitate all further internal communication including to Head Office and overseas.

Position	Contact Details
Site Manager	Office: (02) 9756 8000 Mobile: 0477 747 231
State Manager NSW	Office: (02) 9756 8000 Mobile: 0408 000 948
GM Warehousing ANZ	Mobile: 0407 195 627
HSEQ Manager ANZ	Mobile: 0436 348 589

9.2. Government agencies

As per the flow chart in 8.3, the key external contacts that are required to be notified are listed below.

If a pollution incident occurs where “**material harm**” to the environment is caused or threatened the notification protocol set out in 8.3 is followed.

If the incident presents an **immediate threat** to human health or property call “000”.

If the incident does not require an initial combat agency immediately notify the authorities in the order listed below:

Agency	Contact Number	Comments
EPA	131 555	(24hrs)
Fire & Rescue NSW	1300 729 579	Do not call if 000 has already been contacted.
Safe Work NSW	131 050	02 9214 9220 (AH)
Fairfield Council	02 9725 0222	
Ministry of Health	02 9616 8111	Fairfield Hospital

9.3. Local Community

As per 5.7 of the POEO Act, and as part of this PIRMP, in the event of a notifiable pollution incident, and dependent up on the nature and scale of the incident, immediate neighbouring properties will be notified under the direction of Emergency Services.

In the event of an immediate threat to neighbouring properties and persons, every effort should be made to notify them directly.

10. ADMINISTRATION

This section of the PIRMP provides details on the processes that will be used by employee’s onsite and offsite to make them aware of the PIRMP requirements and document the process for regular testing of the plan.

10.1. Staff awareness / training

All new employees will be made aware of the requirement of the plan as part of their induction process. All employees will be required to complete refresher training on a biennial basis.

In addition to the above induction and training, details of the plan will be provided to key contacts and members of the emergency response team on site.

Training requirements will be identified in the site training matrix. Records of training will be maintained in personnel files or the training records file.

10.2. PIRMP availability

In accordance with Section 153D of the POEO Act, the PIRMP is available to all site employees via site noticeboards and the intranet. This plan has also been made available on the internet at www.dglgroup.com. A hard copy of the plan is also available in the Site Manager’s office.

10.3. Testing of PIRMP

This plan will be tested once a year to ensure that the information contained within the plan is accurate and up to date.

Drills will be carried out and findings documented, and corrective actions implemented.

PIRMP Testing Record

Test date	Tested by/Position	Details of test	Finding of test, including issues identified	Next scheduled testing date
12/02/2024	Robert Shamoun Site Manager	Simulation – chemical spill	Included external authorities in simulation	12/02/2025

10.4. PIRMP Updates

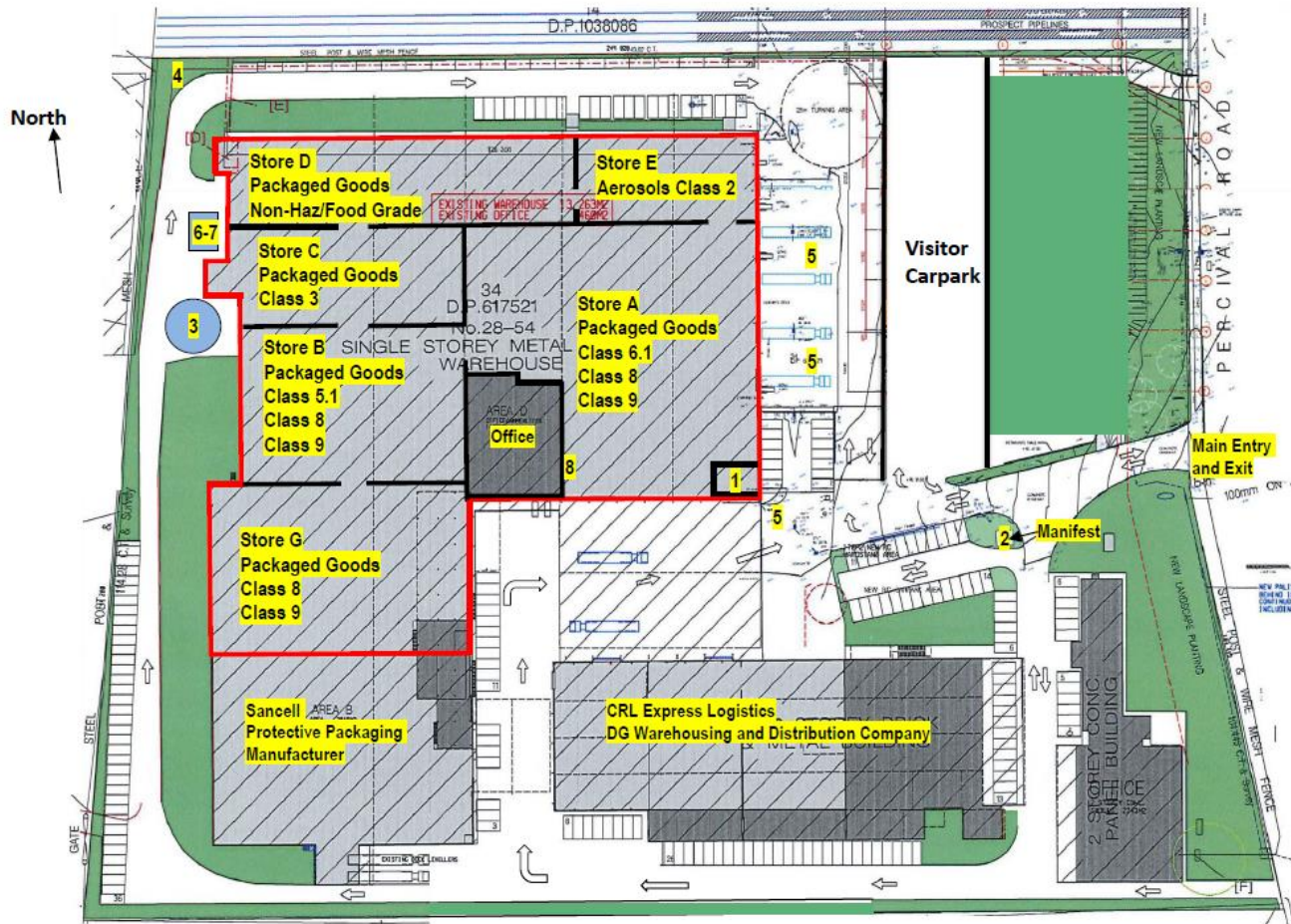
This plan must be reviewed when changes are made on site due to DG products not previously stored with an updated risk assessment alongside any changes/updates required to the PIRMP.

PIRMP Update Details


Reason for update	Details of updates	Date the updated version uploaded to website	Date of completion
New format	Re-write	31-03-2024	31-03-2024
9.1, Appendix 1 and 4	Site Manager New	06-08-2024	06-08-2024

Appendix 1 – Site Map

DGL Warehousing & Distribution Pty Ltd - 28-54 Percival Road Smithfield NSW - Site Map



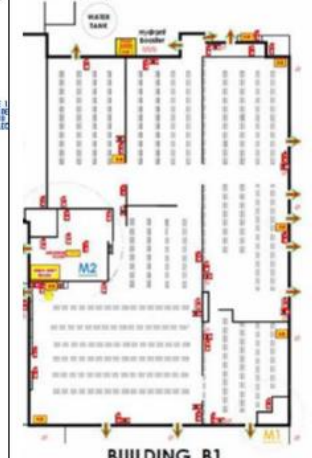
Legend

DGL Area Outlined 

- 1 – Class 3 In Transit Location
- 2 – Manifest Box
- 3 – Fire Sprinkler Tank
- 4 – Sluice Valve Device
- 5 – Stormwater Drain Location
- 6 – Pump House
- 7 – Fire Panel
- 8 – Main Switch Board

Traffic flow direction 

Fire Equipment



LEGEND

-  FIRE EXTINGUISHER
-  FIRE INDICATOR PANEL
-  FIRE HOSE REEL
-  SUB DISTRIBUTION BOARD
-  FIRE HYDRANT
-  EXIT DIRECTION

DGL Warehousing & Distribution - 28-54 Percival Road Smithfield NSW
 GPS Co-Ordinates: -33.84319, 150.94841
 LOT 34 DP 617521

SCALE 

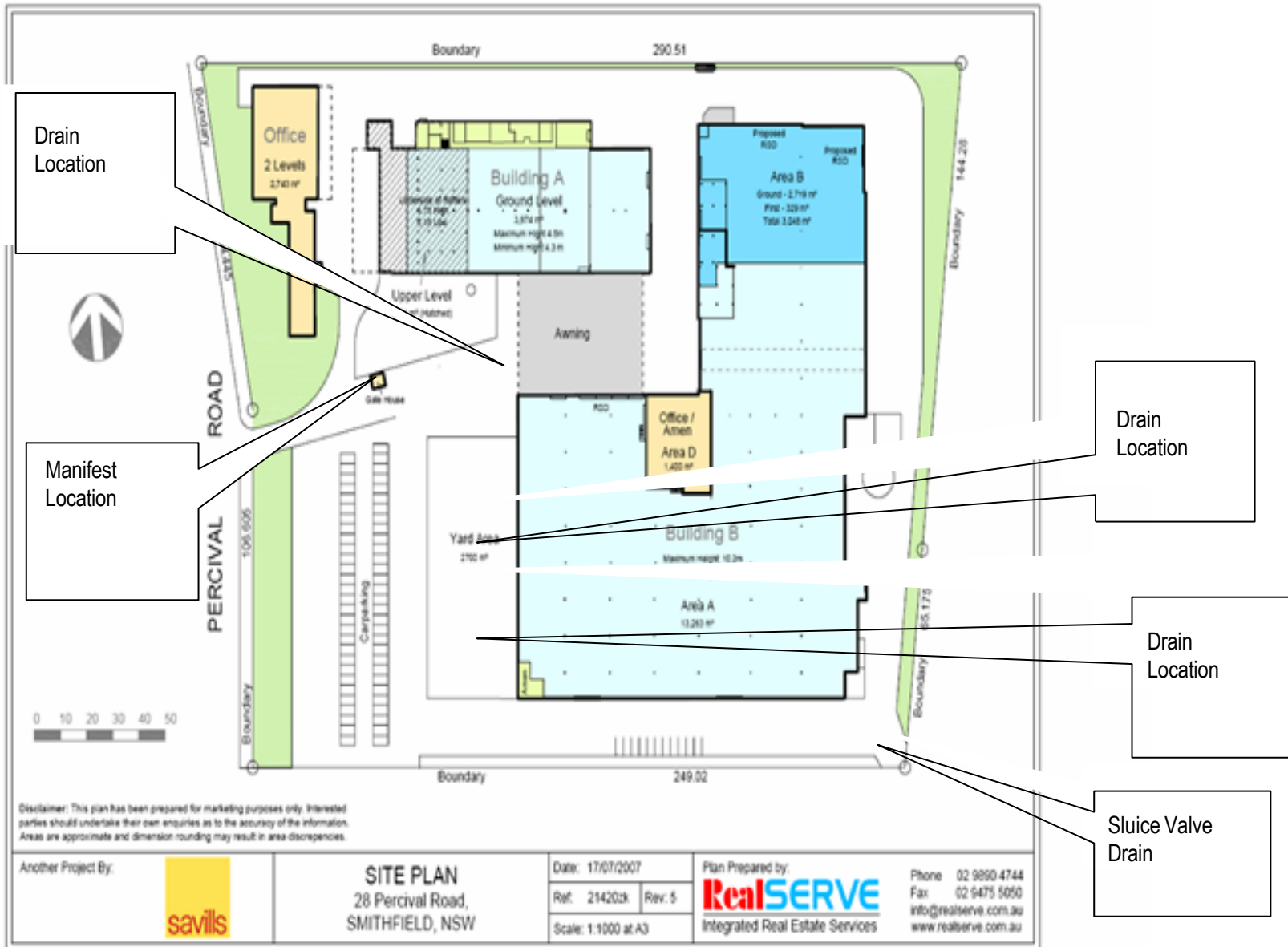
Scale 1-1000 (A3) Date of Plan: July 2017 Date of Revision: 06-08-2024
 Notification Reference Number: NDG200101

Emergency contact 1: Ashika Lata
 Phone: 0477 747 231
 Emergency contact 2: Mekdad Mohamad
 Phone: 0408 000 948
 Emergency Recovery & Waste Management
 Cleanaway – 1800 774 557 24 hours 7 days

Appendix 2 – Neighbourhood Map Aerial



Appendix 3 – Site Plan / Traffic Management Plan



Appendix 4 – ERP

[EMERGENCY RESPONSE PLAN](#)

Appendix 5 – Notification of Hazardous Chemicals on Premises



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