

Primary Connect
Pollution Incident Response Management Plan (PIRMP)
EPL No: 22122
Erskine Park Distribution Centre (EPDC)

[Document Revision Log](#)

Person authorising this Plan -

	Name	Date
Erskine Park Supply Chain Manager	Leanne Peterson	07/08/2026

[Persons involved in the review of this Plan](#)

	Name	Date
Primary Connect State SH&W Manager	Adam Scard	07/08/2026
Director - DC Operations & Store Delivery	Paul Jones	12/08/2026
General Manager Supply Chain NSW	Richard Gill	12/08/2026
Safety Engineer - Functional/Automation	Adam Hallinan	07/08/2026
General Manager, Safety, Wellbeing & Environment	Melanie Cocca	10/08/2026

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Revision History

Revision	Description	Prepared by	Reviewed by	Approved by	Date
1.0	Initial Draft	Kimberley Murdoch	Adam Hallinan		27.07.2025
1.1	Updated from Review of external contractor comments.	Kimberley Murdoch	Darlye McKone		20/04/2026
1.2	Final Draft	Ric Fleischer	Adam Hallinan	Leanne Peterson	31/07/2026

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1. INTRODUCTION

DISTRIBUTION CENTRE DETAILS

The Distribution Centre details, as defined in the Environmental Protection Licence (EPL) 22122, are as follows:

Anniversary Date	04 June 2027
Licensee	Woolworths Group
Licensee address	1 Woolworths Way, Bella Vista, NSW 2153
EPL Issue date	04 June 2026
Scheduled Activities (<i>Protection of Environment Operations Act (POEO) 1997 Schedule 1</i>)	Schedule Activity #9 - General storage in containers of chemical substances classified as a dangerous good in the Transport of Dangerous Goods exceeding minimum criteria identified in Column 2 (POEO Act)
Facility Name	Erskine Park Distribution Centre
Premises is legally defined as	Lot 3 DP1124329
Premises address	29 Sarah Andrew Close, Erskine Park, NSW

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1.1. OVERVIEW OF DEVELOPMENT AND OPERATIONS

1.1.1. PLAN AVAILABILITY

A copy of this plan is to be maintained at the site security office and site main office.

Plan will be issued to:

- Site Manager
- Chief Warden
- Deputy Warden
- Cage Manager
- Security Office
- Communications Manager
- Construction Manager

This plan will be made available to anybody that requests it by contacting [Leanne Peterson](mailto:lpeterson1@primaryconnect.com.au) (Supply Chain Manager) - 0488 447 061 lpeterson1@primaryconnect.com.au or [Lauren Jenkins](mailto:lspratt@primaryconnect.com.au) - 0447 810 925 (Safety Lead) lspratt@primaryconnect.com.au

A copy of this plan and its revisions will be available 14 days after the issue or revision of this document on site and online at the website: www.primaryconnect.com.au/safety/

1.1.2. PLAN OBJECTIVES

The Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with Part 5.7A Section 153A of the *Protection of the Environment Operations Act 1999 (PEOE Act)* and *Section 72 of the Protection of the Environment Operations (General) Regulations 2022 (PEOE Regulations)*

The objectives of the PIRMP (as per the EPA's Guideline: Pollution Incident Response Management Plans) are to:

- provide comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment and Operations Act 1997 (such as local councils, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident;
- minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks; and
- assist with plan implementation by identifying persons responsible for implementing it, and regularly tested for accuracy, currency and suitability.



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1.1.3. RELEVANT LEGISLATIVE

Key environmental legislation relating to pollution incident response management includes:

- Protection of the Environment Operations Act 1997 (POEO Act);
- Protection of the Environment Operations (General) Regulation 2022.

1.1.4. GUIDELINES and STANDARDS

- Key environmental guidelines relating to pollution incident response management includes: Environmental guidelines: Preparation of pollution incident response management plans, 2012.
- RMS: Environmental Incident Classification and Reporting Procedure Sep 2017.

1.1.5. LEGISLATIVE REQUIREMENTS

Key environmental legislation relating to pollution incident response management are summarised in the below table - Plan requirements.

Plan Requirements

General Requirements for preparing PIRMPs	Legislative Ref of POEO Act	Legislative Ref of POEO (General) Regulation	Reference Section of this Plan
Form of plan			
- Written form and available at the premises.	Section 153D	Regulation 71 (a)	
- Made available on request.	Section 153D	Regulation 71 (a)	
- May form part of another document (i.e., existing emergency plan or incident management plan) as long as it is readily identifiable as such in that other document, and it meets the requirements of section 153C of POEO Act and the POEO (G) Regulation.		Regulation 71 (b)	N/A

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General Requirements for preparing PIRMPs	Legislative Ref of POEO Act	Legislative Ref of POEO (General) Regulation	Reference Section of this Plan
- Made publicly available in the 14 days after it has been prepared: i) At an accessible website. ii) If there is not a website, providing a copy of the plan to anybody that requests it.		Regulation 71 (b)	1.1
Main Hazards			
- Description and likelihood of the main hazards to human health or the environment associated with the activity undertaken at the premises.		Regulation 72 (a) and (b)	5
Procedures			
- Procedures to be followed by the EPL holder or the occupier of the premises, in notifying: a) The owners or occupiers of premises in the premises. b) The local authority. c) Any persons or authorities that required to be notified by Part 5.7 of the Act.	Section 153C (a)		3.1
- The procedures to be followed for co-ordinating with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident.	Section 153C (c)		3.1
Actions			
- Pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment.		Regulation 72 (c)	7
- A detailed description of the action		Regulation 72 (l)	3

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General Requirements for preparing PIRMPs	Legislative Ref of POEO Act	Legislative Ref of POEO (General) Regulation	Reference Section of this Plan
to be taken immediately after a pollution incident, to reduce or control any pollution.			
Contacts Details (name, role and 24h phone number)			
- Of the key personnel responsible for activating the plans and managing the response.		Regulation 72 (g)	3.1.1
- Of the EPA, the local council, NSW Ministry of Health, WorkSafe NSW and Fire and Rescue NSW, relevant to the licensee's premises. Or any other organisation or agency that needs to be advised).		Regulation 72 (h)	3.1.2
Inventory			
- Inventory of potential pollutants to be kept at the premises.		Regulation 72 (d)	4
Risk Minimisation			
- Details of the arrangements for minimising the risk of harm to any persons on the premises. - 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.		Regulation 72 (j)	8

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General Requirements for preparing PIRMPs	Legislative Ref of POEO Act	Legislative Ref of POEO (General) Regulation	Reference Section of this Plan
- Detailed map or maps showing the location of: • The premises which the license relates. • The surrounding area likely to be affected by a pollution incident. • The location of any pollutants. • The location of any storm water drains. • The discharge locations of the storm water.		Regulation 72 (k)	3.3
Staff Training			
- The nature and objectives of any staff training program in relation to the plan.		Regulation 72 (m)	10
Plan Testing			
- The dates on which the plan has been tested and the name of the person who carried out the test. - The manner in which the plan is to be tested and maintained.	Section 153E	Regulations 75 and 72 (n), (p), (f) and (g)	11.2
Plan Updates			
- The dates on which the plan is updated.		Regulation 72 (o)	11.3

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2. DEFINITIONS

Term	Definition
EPDC	Erskine Park Distribution Centre
EPA	Environmental Protection Authority
EPL	Environmental Protection Licence 22122
ERP	Emergency Response Plan
PIRMP	Pollution Incident Response Management Plan
POEO Act/Regulation	<i>Pollution of the Environment Operations Act/Regulation</i>
SDS	Safety Data Sheet
PPE	Personal Protective Equipment

3. WHAT IS A POLLUTION INCIDENT

3.1. DEFINITION OF A POLLUTION INCIDENT AND MATERIAL HARM

The *POEO Act* defines a 'pollution incident':

'Pollution incident means 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.'

'Pollution':

- '(a) water pollution, or
- (b) air pollution, or
- (c) noise pollution, or
- (d) land pollution.

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3.2. POLLUTION INCIDENTS THAT REQUIRE NOTIFICATION

A pollution incident is required to be notified if there is a risk of 'material harm to the environment' as a result of activities undertaken by the **principal** or delegate in relation to the scheduled activities. Material Harm 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 or property damage of an amount, or amounts in aggregate, exceeding \$50,000 (or such other amount as is prescribed by the regulation), 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.

Determination of a material harm incident will be made by the Supply Chain Manager. If the Supply Chain Manager is not available immediately, then determination can be made by Operations Manager in consultation with the site Safety Lead.

In the event of a Class 2 or Class 3 pollution incident the following stakeholders must be notified immediately by the principal;

- EPA; NSW Department of Planning
- Depart of Housing and Infrastructure
- NSW Health
- Fire and Rescue NSW
- SafeWork NSW
- and Penrith City Council.

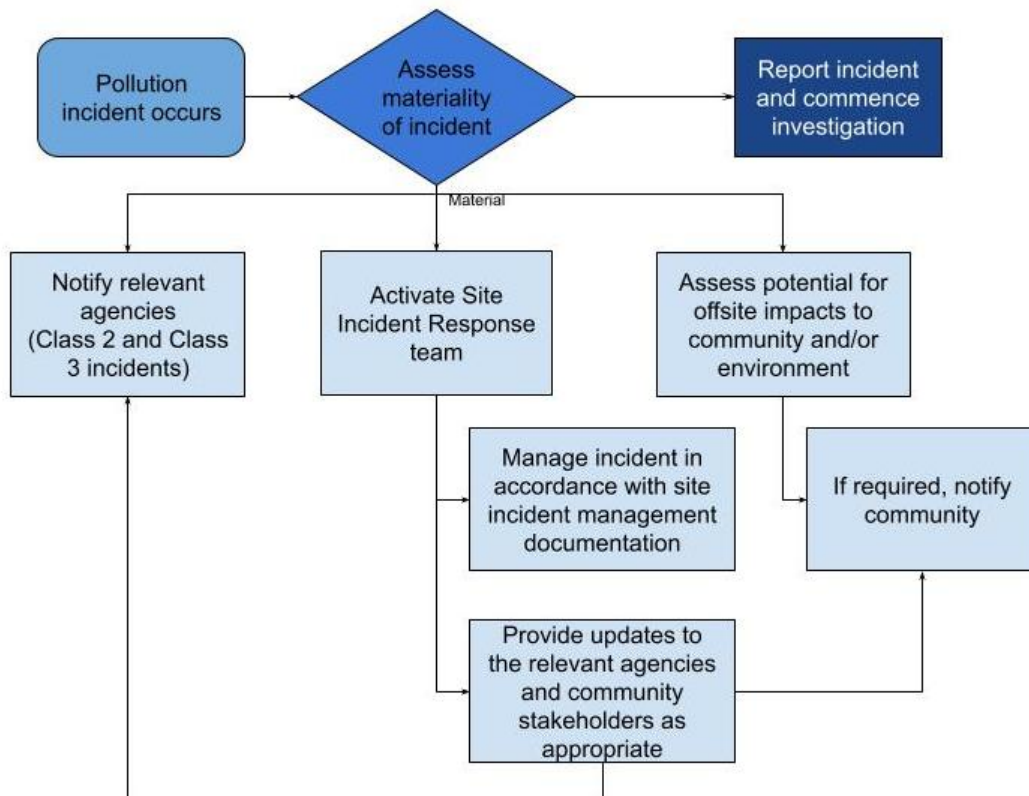
Three categories of environmental incidents have been adopted and described in the below table.

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Incident Category	Direct Cost including clean up	Impact
Class 1	Up to \$50,000	- Pollution or degradation which has low severity impacts on the community and/or environment in the short-term (<1 month duration) and is fully reversible with no residual impacts. - Harming a protected animal that is not vulnerable or threatened.
Class 2	\$50,000 to \$100,000	- Pollution or degradation which has moderate severity impacts on the community and/or environment (1-3 months duration) but is fully reversible with no residual impacts. - Harming an animal that is (or is part of) a vulnerable species or vulnerable ecological community. - Picking a plant that is (or is part of) a vulnerable species or vulnerable ecological community.
Class 3	More than \$100,000	- Pollution or degradation which has high severity impacts on the community and/or environment and may have irreversible residual impacts. - Harming an animal that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community) (S2.1). - Picking a plant that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community). - Damaging a declared area of outstanding biodiversity value. - Knowingly damages any habitat of a threatened species or threatened ecological community. - Contravention of a stop work order.

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3.3. POLLUTION RISK ASSESSMENT INCIDENT RESPONSE PROCESS



3.4. COMMUNICATION PROTOCOL

Relevant information that is required to be given:

- EPL # 22122 and MP 06_0253
- Time, date, nature, duration and location of the incident;
- Location of the place where pollution is occurring or is likely to occur;
- Nature, estimated quantity or volume and concentration of any pollutants involved;
- Circumstances in which the incident occurred; and
- Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution if known.
- Contact person for further communication regarding the incident.

In accordance with MP 06_0253 CoC 42 - *The Applicant must provide the Department with a subsequent incident report in accordance with the requirements set out in Appendix 4 (Incident Notification and Reporting Requirements).*

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3.4.1. INTERNAL STAKEHOLDERS

Internal communications will be undertaken as per the site ERP.

Position	Name	Title	Contact Number	Email Address
Chief Warden	Dylan Niemann	Shift Operations Manager (Day)	0423780987	dniemann@primaryconnect.com.au
Deputy Warden	Leanne Peterson	Supply Chain Manager	0488447061	lpeterson1@primaryconnect.com.au
Fire Warden	Jared Ainsworth	Shift Operations Manager (Afternoon)	0439689529	jainsworth@primaryconnect.com.au
First Aid	Adrian Munchenburg	Work force planner	0407555241	amunchenburg@primaryconnect.com.au
DG Coordinator	Lauren Jenkins	Safety Lead	0447810925	lspratt@primaryconnect.com.au
Communications	Leanne Peterson	Supply Chain Manager	0488447061	lpeterson1@primaryconnect.com.au
Traffic Management	Site Security	Site Security	0288872120	epdcgatehouse@primaryconnect.com.au
Waste Management	David Buckland	Facilities Manager	0404829291	dbuckland@woolworths.com.au
Site Security	Kevin Grace	Security Supervisor	0288872120	kgrace1@primaryconnect.com.au

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3.4.2. GOVERNMENT AGENCIES

External Agencies	Contact Information
Environmental Protection Authority	131 555
SafeWork NSW	13 10 50
Penrith City Council	02 4732 7777
Department of Planning Housing and Infrastructure	1300 305 695 (Mon - Fri, 9:00am to 5:00pm) Refer to EPA outside these hours
Ambulance	Telephone: 000
Fire Service	
Police	
NSW State Emergency Service	132 500
Nepean Hospital	(02) 4734 2000
	Kingswood NSW 2747
Blacktown Hospital	(02) 9881 8000
	18 Blacktown Road, Blacktown
Sydney Water NSW	13 20 90 (24hrs/7days)

3.4.3. ADJACENT NEIGHBOURS

Neighbour	Contact Number
Linfox	Nigh Luong - 02 9670 9104 / 0414 196 963
Toll KCA	Mardi McKinnon - 02 9963 8000
UBEECO Package Solutions	Scott Boomer - 02 9670 9822

3.5. EVENT REPORTING AND INVESTIGATION

Reporting and recording of environmental events are to be undertaken in accordance with SIWE Incident Management standard PC-S16-P01 and initial incident response NAT-PC-S16-PR03.

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3.6. MAPS

The Woolworths Erskine Park Distribution Centre (EPDC) located at 29 Sarah Andrews Close, Erskine Park NSW. The site is approximately 39 km west of the Sydney Central Business District (CBD). Figure 1 shows the location of the site in relation to the CBD.

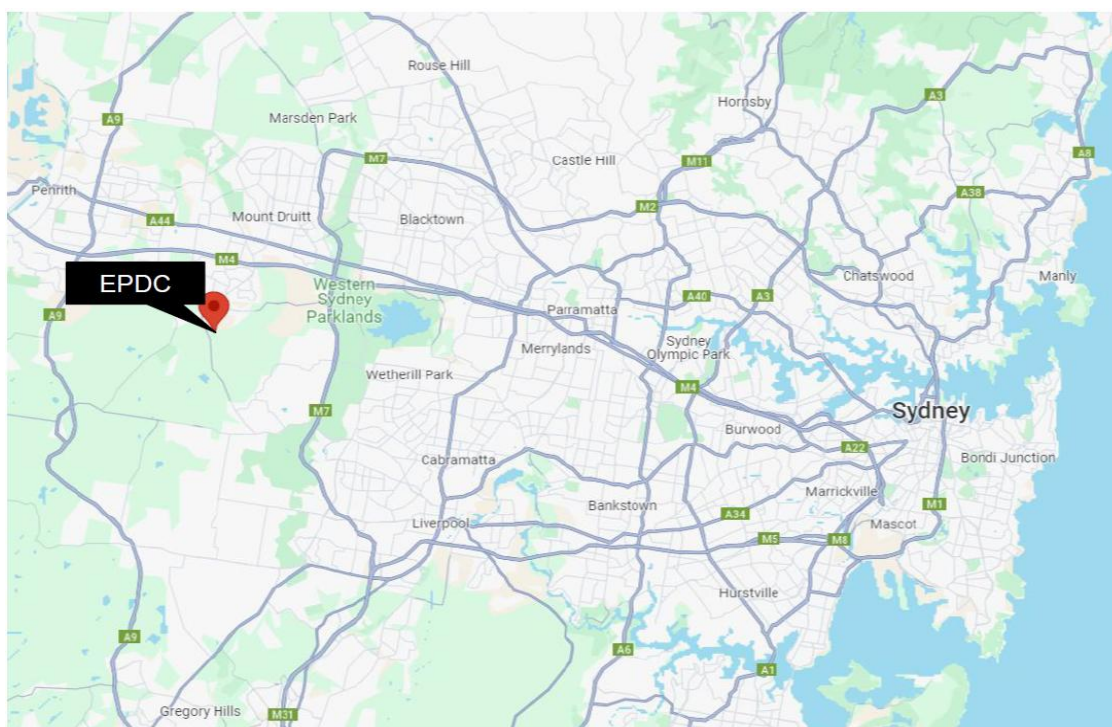


Figure 1 - Site location

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Figure 2 - EPDC Premises overview showing neighbouring properties

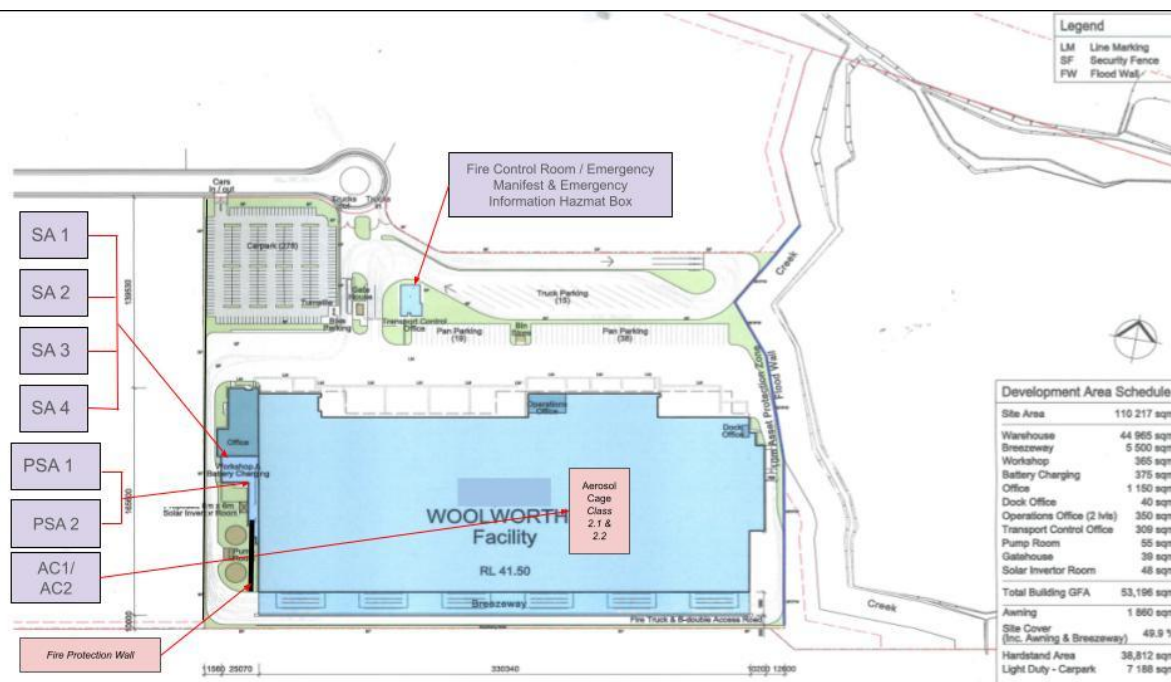


Figure 3 - Location of pollutants

Erskine Park Distribution Centre (EPDC)

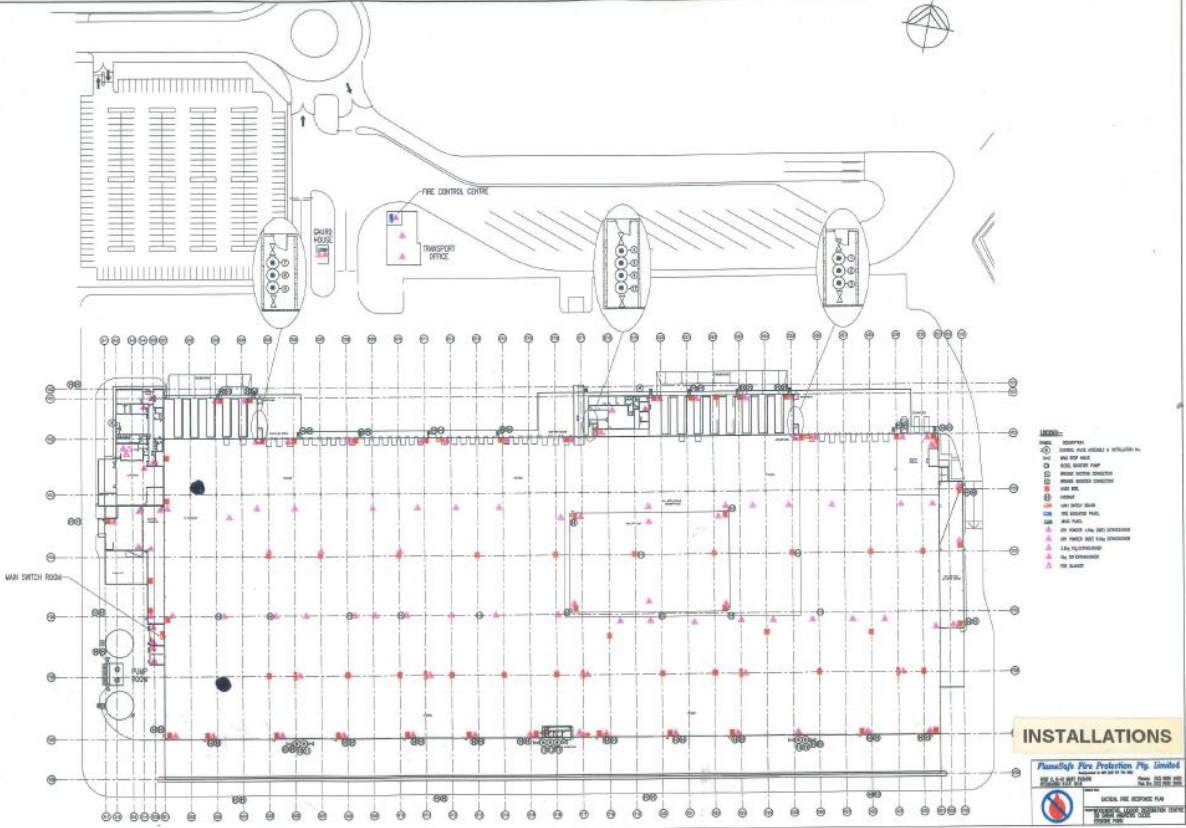


Figure 4 - Safety Equipment Location

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4. INVENTORY OF POLLUTANTS

4.1. HAZARDOUS CHEMICALS STORED IN TANKS (OTHER THAN IBC'S):

Storage Area	Name	UN No.	Class	Type	Capacity	Typical Quantity
SA 1	LP Gas	1075	2.1 Flammable Gas	Portable Tanks	66.64L	33.32L
SA 2	Helium	1046	2.2 Non Flammable Gas	Portable Tanks	680L	680L
SA 3	Acetylene	1001	2.1 Flammable Gas	Portable Tank	1000L	1000L
SA 4	Compressed Gas N.O.S. (Argon/ Carbon Dioxide)	1956	2.2 Non-Flammable Non-Toxic Gas	Portable Tank	4100L	4100L

4.2. PACKAGE STORAGE AREA:

Package Storage Area	Name	UN No.	Class	Sub Risk	PG	Type	Capacity	Typical Quantity
PSA 1	Flammables in Cabinet	1950 1011 1057	2.1 Flammable Gas		-	Aerosol Cans in Cabinet	80L	80L
PSA 2	Lead-acid wet batteries Sulfuric acid	2796	8 Corrosive		III	Room inside a building	33698L	30000L

4.3. AEROSOL CAGE AREA:

Aerosol Cage	Name	UN No.	Class	Type	Capacity	Typical Quantity
AC 1	Aerosols	1950	2.1 Flammable Gas	Flammable Aerosols	99400L	97000L
AC 2	Petroleum Gases, Liquefied	1950	2.2 Non-Flammable Non-Toxic Gas	Non-flammable, non-toxic gases Aerosols	5000L	5000L

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5. DESCRIPTION AND LIKELIHOOD OF HAZARDS

Hazard Assessment Summary tables are outlined in the appendix. These assessments provide a description of the event, likely causes, consequences, responses, controls and ranking for materiality of the consequences.

A Management of Change and the following Risk Assessments have been developed to understand the impacts of this change:

- Risk Assessment – pre-construction phase (includes Builders assessments and processes for managing hazards/contractors) – document EPDC-S08-RA0637.
- EPDC - Environmental Aspects and Impacts Register - document EPDC-S08-RA0636.

These have been developed and are maintained to identify the main hazards to human health, or the environment associated with a pollution or other incident at site.

6. EMERGENCY RESPONSE

An Emergency Response Plan (REF:029SAR) is in place which describes the onsite actions to be taken in response to an incident that has resulted (or has the potential to result) in a material impact to human health and/or the environment.

This plan will be activated in parallel with the PIRMP as required to minimise the impacts of the pollution incident as much as practically possible through early response/management.

7. PRE-EMPTIVE ACTIONS TO REDUCE THE RISK OF HARM TO HUMAN HEALTH OR THE ENVIRONMENT

As outlined in the hazard assessment summary tables in the appendix, specific pre-emptive actions are highlighted to reduce the risk of harm to human health or the environment where a specific incident may occur. In addition, the following pre-emptive actions are implemented to reduce the risk of harm occurring as a result of a pollution incident:

- Site personnel receive regular training;
- Relevant personnel are trained in the appropriate use of safety equipment and general use of pollution control equipment;
- Regular inspection;
- Maintenance regimes and checks are in place for site equipment and storage facilities;
- Communications are provided to site personnel to communicate incidents, hazards and corrective actions; and
- Incidents are investigated and corrective actions are developed and implemented to prevent recurrence;

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8. MINIMISATION OF HARM TO PERSONS ON THE PREMISES

To minimise the risk of harm to any person, should an incident occur, the following actions and arrangements are in place:

- Site personnel are informed, trained and competent, relating to their responsibility and required actions during an emergency;
- Emergency Control Organisation members have been established that undertake regular training;
- Evacuation points are clearly recognised on site by appropriate signage;
- All visitors must be familiarised with the site and made aware of the evacuation procedure;
- Minimum personal protective equipment (PPE) requirements are in place; and
- Signage is in place where hazardous materials are stored.

9. EQUIPMENT AVAILABLE TO CONTROL OR CONTAIN A POLLUTION INCIDENT

As outlined in the Emergency response plan, highlights hazardous material to determine what action needs to be taken in the event of a spill.

Safety equipment and information available includes:

- Spill kits.
- A selection of PPE.
- Fire extinguishers and hydrants.
- SDSs (available through Chemwatch).
- Eye wash stations and safety showers.

10. STAFF TRAINING

A Training Needs Analysis (available upon request) has been undertaken to identify training requirements across the various roles, ensuring appropriate content is delivered and outlines the delivery method and relevance.

This training package has been developed and is administered by the training department. Training records are managed through SuccessFactors.

Additional information is provided to site personnel through pre-shift communications and awareness sessions.



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11. PLAN ADMINISTRATION

11.1. AVAILABILITY OF PLANS

In accordance with Section 153D of the POEO Act and Section 74 of the POEO Regulation, the plan will be made available to all site personnel via notice board and site document control system.

A public version will be made available through:

- Public version on the Primary Connect website - www.primaryconnect.com.au/safety/
- Providing public copies to any person who request a copy of the plan

11.2. PIRMP TESTING

In accordance with Part 5.7A Section 153E of the POEO Act and Section 75 of the POEO Regulation this plan will be tested at least once every 12 months to ensure that the information constrained within the plan is accurate and up to date.

The PIRMP will also be tested within one (1) month of any pollution incident occurring that caused or threatened material harm to the environment.

11.3. PIRMP REVIEW

The PIRMP will be reviewed on a yearly basis in conjunction with testing, with updates occurring where there are any identified improvements or where personnel or contact details for regulatory agencies have changed or there is an update to site procedures and revision in documentation.

12. PENALTIES FOR NON-COMPLIANCE

As set out in the POEO Act in relation to PIRMP requirements these relate to the failure to:

- Prepare a PIRMP that complies with Part 5.7A of the POEO Act;
- Ensure the PIRMP is kept at the premises the EPL relates to; and
- Test the PIRMP in accordance with the POEO regulations.

The holder of the EPL must prepare a PIRMP in relation to the activity to which the licence relates, made available and tested in accordance with the regulations.

Maximum penalty -

- (a) In the case of a corporation - \$2,000,000 and, in the case of a continuing offence, a further penalty of \$240,000 for each day the offence continues, or
- (b) In the case of an individual - \$500,000 and, in the case of a continuing offence, a further penalty of \$120,000 for each day the offence continues.

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement any PIRMP in relation to the activity.

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Maximum penalty -

- (a) In the case of a corporation - \$4,000,000 and, in the case of a continuing offence, a further penalty of \$480,000 for each day the offence continues, or
- (b) In the case of an individual - \$1,000,000 and, in the case of a continuing offence, a further penalty of \$240,000 for each day the offence continues.

13. REFERENCES AND ASSOCIATED DOCUMENTS

Relevant statutory requirements, as detailed in the POEO Act and POEO Regulations for inclusion in the PIRMP and where the requirement is described in the plan.

Section Clause	Requirements	PIRMP Section
POEO Act Section 148, 149	Notification process	3.1
POEO Act Section 153C (b) and 153F	Action to be taken following a pollution incident	6
POEO Act Section 153C (c)	Procedure for coordination with the EPA, local council, Ministry of Health, Safework NSW and Fire & Rescue NSW	7

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13.1. HAZARD ASSESSMENT SUMMARY TABLES

Facility	Erskine Park Distribution Centre
Storage ID	AC 1- Aerosols
Hazard	Fire, Explosion, or projectile
Cause	Heating of containers from general fire ; damage from forklift tynes or dropped packages.
Impact	Radiant heat impacts ; potential flash fire or Vapour Cloud Explosion (VCE) ; contaminated fire water runoff.
Likelihood	Low due to pressure testing during manufacture and elimination of ignition sources
Controls	Dedicated caged area; In-rack sprinklers; automatic penstock valve for containment.
Action to be taken	Operational: Maintain high standard of housekeeping to prevent accumulation of debris Maintenance: Conduct annual hydrant/sprinkler testing and pressure loss analysis for hydrants. Emergency: Ensure ERP is followed and available Training: Ensure staff are trained in reporting damaged goods and use of spill kits Safety: Fire extinguisher at the entrance of the aerosol cage is powder-type

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Facility	Erskine Park Distribution Centre
Storage ID	AC 2 - Non-Flammable, Non-Toxic Gas (Aerosols)
Hazard	Asphyxiation and physical projectile risk
Cause	Container failure due to heating of containers during a warehouse fire or mechanical damage from forklift operations.
Impact	Localised oxygen displacement, where release of gas may create a localised asphyxiation hazard, though it is insufficient to impact areas offsite. Projectile risk if canisters are involved in a fire.
Likelihood	Very Low due to aerosol canisters are pressure tested during manufacture to ensure structural integrity. Gas volume per canister is too small to reach lethal asphyxiation levels in a ventilated warehouse.
Controls	Dedicated caged area; In-rack sprinklers; natural and mechanical warehouse ventilation to prevent gas accumulation
Action to be taken	Operational: Maintain high standard of housekeeping to prevent accumulation of debris Emergency: Ensure ERP is followed and available Training: Ensure staff are trained in reporting damaged goods and use of spill kits

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13.2. ENVIRONMENTAL - ASPECTS & IMPACTS (POLLUTION) RISK ASSESSMENT

The pollution risk assessment includes the following:

- **Environmental Aspect**
 - element of an organisation's activities or products that can interact with the environment
- **Impact**
 - any change to the environment, whether adverse or beneficial, wholly or partially resulting from an
 - organization's environmental aspects
- **Existing Controls**
 - prevention of pollution
 - use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts
 - NOTE Prevention of pollution can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, reuse, recovery, recycling, reclamation and treatment.
- **Consequence**
- **Likelihood**
- **Inherent Impact Rating (See Risk Matrix)**
- **Additional Controls**
- **Relevant Legislation, Licenses, Standards and Risk Assessments**
 - Work Health and Safety Act 2011
 - Work Health and Safety Regulation 2025
 - COP Managing risks of hazardous chemicals in the workplace Dec 2022
 - EPDC RA0606 Hazardous Waste Removal
 - EPDC RA0575 Hazardous Chemicals
 - EPDC RA0631 Dangerous Goods / Aerosol (2.1 & 2.2)
 - EPDC RA107 Wildlife
 - EPDC RA0033 Emergency Preparedness
 - EPDC RA0574 Occupational Health Surveillance

	Level 1	Level 2	Level 3	Level 4	Level 5				
Almost certain	Low	Medium	High	Very High	Very High	Level 5	Permanent, significant damage to the natural environment or heritage site. Significant impact to local environment, communities or species.	Almost certain	Risk is difficult to avoid or is inevitable. May happen on a monthly basis or more frequently.
Likely	Low	Medium	High	High	Very High	Level 4	Environmental or heritage damage outside a corporate site. Remediated with significant long-term effort and cost.	Likely	Could occur in most circumstances, not surprised if it happens. Could occur multiple times in the next 12 months.
Possible	Very Low	Low	Medium	High	Very High	Level 3	Environmental or heritage damage impacting a single site. No off-site impacts, but significant on-site remediation possible.	Possible	Previous history of occurrence in Woolworths or sector. May occur in the next 12 months.
Unlikely	Very Low	Low	Low	Medium	High	Level 2	Incident/s with limited, site-specific environmental or heritage impacts. Addressed in days or weeks using routine processes.	Unlikely	Limited or no recent history of occurrence in Woolworths or sector. Not expected to happen in the next 12 months.
Rare	Very Low	Very Low	Low	Medium	High	Level 1	Single incident. Little to no environmental or heritage impacts.	Rare	May occur but only in exceptional circumstances. Has not occurred in Woolworths or sector. Remote chance of occurrence in the next 12 months.

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14. ANNEXES

Erskine Park Distribution Centre (EPDC)

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Erskine Park Distribution Centre (EPDC)

No.	Environmental Aspect	Impact	Existing Controls	Consequence [1]	Likelihood [2]	Inherent Impact Rating (See Risk Matrix)	Additional Controls	Relevant Legislation, Licenses, Standards and Risk Assessments
Emissions to air								
1	Combustion of diesel to power generators.	Adverse Effects -Release of carbon monoxide due to combustion of diesel fuel. Beneficial - Biodiesel synthetic fuel is utilized Nationally to reduce impact and emissions. Reduction in main power supply which would negate the adverse effect via reduction of power to the environment	Only operated during periods of power generation. Use of approved fuels only (Synthetic diesel fuel).	Level 1	Possible	Very Low	Licensed currently maintain and test generator whilst under warranty.	* Dangerous Goods Act * Protection of the Environment Operations Act (NSW) * Protection of the Environment (Clean Air) Regulations (NSW)
2	LPG consumed in Forklifts.	Adverse Effects - Release of greenhouse gases to the environment	Minimised use of gas operated forklifts. LPG gas emission analysis is performed by a qualified technician, to ensure there are no leaks.	Level 1	Unlikely	Very Low	No forklifts on-site at EPDC with LPG.	* Dangerous Goods Act * ADG Code * Protection of the Environment Operations Act (NSW) * Protection of the Environment (Clean Air) Regulations (NSW) * AS/NZS 1598 – The storage and handling of LP gas.
3	Gases generated by Battery Charging.	Adverse Effects - Hydrogen gas produced through charging of batteries. Sulphuric acid from batteries entering stormwater drains.	Ventilation in line with BCA and AS 2676 and 4086 (Ventilation). Design of rooms in line with AS/NZS 4509. Separator pits in battery rooms. Air sensor alarms fitted. Faulty batteries segregated for disposal. Batteries replaced as per manufacturer's instructions. Annual servicing of all equipment. Weekly Servicing on batteries that are showing faults is performed. Defect management in place with Lock Out Tag Out (LOTO).	Level 1	Unlikely	Very Low	Automatic Fire doors for separation.	* Ventilation in line with AS/NZS 4509 EPA ACT * Design of rooms in line with AS/NZS 4509 EPA ACT * Protection of the Environment Operations Act (NSW) * Protection of the Environment (Clean Air) Regulations (NSW).
Releases to water								
4	Transport, distribution and storage of chemicals for retail sale.	Adverse Effects - Pollution of waterways. Impairment to human health, flora and fauna due to contamination of waterways.	All DGs are stored in racking that is engineered and designed to store these particular goods. Goods that are transported are packaged in accordance with the relevant transport guidelines (ATA, ADG & IMDG). These products are transported as retail distribution loads, and at limited quantities and stored in the manufacturers packaging and not broken down or Site has adequate Chemical Spill Kits with spill kit training provided to team members.	Level 3	Unlikely	Low	Designed and authorised caged area for aerosol storage of class 2.1 & 2.2 aerosols. 2 x 205 Litre drums for damaged, leaking or unsalable aerosol can collection by a designated contractor. Underground stormwater GPT tanks, collected by Sydney water.	* ADG (Road & Rail), IATA (Air) and IMDG (Sea) Freight codes. * Protection of the Environment Operations Act (NSW) * Heavy Vehicle (Adoption of National Law) Act 2013 No 42 * Heavy Vehicle (Adoption of National Law) Regulation 2022 * COP Managing risks of hazardous chemicals in the workplace Dec 2022
5	Transport of Grocery Products and General Merchandise products by sea to Tasmania for retail sale.	Adverse Effects - Pollution of waterways. Impairment to human health, flora and fauna due to contamination of waterways.	All DGs are stored in racking that is engineered and designed to store these particular goods. Goods that are transported are packaged in accordance with the relevant transport guidelines (ATA, ADG & IMDG). These products are transported as retail distribution loads, and at limited quantities and stored in the manufacturer's packaging and not broken down or opened as single items. Site has adequate Chemical Spill Kits with spill kit training provided to team members.	Level 3	Unlikely	Low	Designed and authorised caged area for aerosol storage of class 2.1 & 2.2 aerosols. 2 x 205 Litre drums for damaged, leaking or unsalable aerosol can collection by a designated contractor. Underground stormwater GPT tanks, collected by Sydney water.	* ADG (Road & Rail), IATA (Air) and IMDG (Sea) Freight codes. * Protection of the Environment Operations Act (NSW) * Heavy Vehicle (Adoption of National Law) Act 2013 No 42 * Heavy Vehicle (Adoption of National Law) Regulation 2022 * COP Managing risks of hazardous chemicals in the workplace Dec 2022
6	Transport, distribution and storage of liquid products for retail sale.	Adverse Effects - Pollution of waterways. Impairment to human health, flora and fauna due to contamination of waterways.	All DGs are stored in racking that is engineered and designed to store these particular goods. Goods that are transported are transported in accordance with the relevant transport guidelines (ATA, ADG & IMDG). These products are transported as retail distribution loads, and at limited quantities and stored in the manufacturer's packaging and not broken down or opened as single items. Site has adequate Chemical Spill Kits with spill kit training provided to team members.	Level 3	Unlikely	Low	Designed and authorised caged area for aerosol storage of class 2.1 & 2.2 aerosols. 2 x 205 Litre drums for damaged, leaking or unsalable aerosol can collection by a designated contractor. Underground stormwater GPT tanks, collected by Sydney water.	* ADG (Road & Rail), IATA (Air) and IMDG (Sea) Freight codes. * Protection of the Environment Operations Act (NSW) * Heavy Vehicle (Adoption of National Law) Act 2013 No 42 * Heavy Vehicle (Adoption of National Law) Regulation 2022 * COP Managing risks of hazardous chemicals in the workplace Dec 2022

Approved By: State Safety Manager | **Document owner:** Safety Lead

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Environmental - Aspects & Impacts Register						
No.	Environmental Aspect	Impact	Existing Controls	Consequence [1]	Likelihood [2]	Inherent Impact Rating (See Risk Matrix)
7	Spills of chemicals, storage & use of chemicals.	Adverse Effects - Pollution of waterways, impairment to human health, flora and fauna due to contamination of waterways.	All DC's are stored in racking that is engineered and designed to store these particular goods. Goods that are transported are transported in accordance with the Australian Transport Guide (ATG) & MSDS. Transport loads are transported as retail distribution loads, and all limited quantities and stored in the manufacturer's packaging and not broken down or opened as single items. Site has adequate Chemical Spill Kits with appropriate training provided to team members.	Level 2	Possible	Low
8	Spill from storage & use of diesel fuel for emergency generator	Adverse Effects - Pollution of waterways; impairment to human health, flora and fauna due to contamination of waterways. Release of carbon monoxide due to fuel burn (minimal given annual usage). Beneficial - Biodiesel synthetic fuel is utilised which is a renewable and cleaner fuel. Reduction in mains power supply which would negate the adverse effect via reduction of power	Tanks inspected and maintained regularly by the Landlord Goodman. Only operated during periods of power outage and servicing of plant. Daily checks are performed for loss or ingress, annual integrity checks are completed, delivery of fuel is monitored and stored safely. Engineering controls in place to protect fuel tanks from impact. Use of approved fuels only (Synthetic diesel fuel)	Level 2	Rare	Very Low
9	Spills of chemical and fuel from trucks rupturing diesel tanks during loading and unloading	Adverse Effects - Pollution of stormwater and waterways; Impairment to human health, flora and fauna due to contamination of waterways.	Chemical Spill Kits are provided. Only licensed, trained and authorised personnel are to undertake the Loading & Unloading of tanks. Spill kit training is provided. If a spill occurs, the appropriate instance of fuel spill on public road way to assist with adequate clean up.	Level 2	Possible	Low
10	Contaminated fire-fighting water	Adverse Effects - Pollution of waterways, impairment to human health, flora and fauna due to contamination of waterways.	Water control is managed by automatic petcock valves	Level 2	Unlikely	Low
11	Spills of product with broken packaging/breakages e.g. soft drinks or juice which may also occur as a result of falls from height from racking locations.	Adverse Effects - Pollution of waterways; impairment to human health, flora and fauna due to contamination of waterways. Additional waste generated to landfill.	SAP Workflows are reviewed by Regional SH&E Managers to ensure the new SKUs being introduced into the network are not overweight or over size and can therefore be safely stored within DCs. Goods are stored in racking that is engineered and designed to house these goods. These products are transported and stored in the manufacturer's packaging and not broken down or opened. Site has Chemical Spill Kits and training is provided to cleaners. We have procedures in place for when breakages occur the glass is cleaned up as per the National Glass Procedure. Procedures and training are in place for the adequate securing of loads going into reserve locations and in transit. Designated bins for broken glass with certified contractor collection.	Level 1	Possible	Very Low

Additional Controls	Relevant Legislation, Licenses, Standards and Risk Assessments
Designed and authorised capped area for aerosol storage of class 2.1 & 2.2 aerosols. 2 x 205 Litre drums for damaged, leaking or unsuitable aerosol can contacts by a designated contractor. Underground stormwater GPT tanks, collected by Sydney water.	- Safety Data Sheet - Protection of the Environment Operations Act (NSW) - CCP Managing risks of hazardous chemicals in the workplace Dec 2022
Underground stormwater GPT tanks, collected by Sydney water.	- Safety Data Sheet - Dangerous Goods Act - Protection of the Environment Operations Act (NSW) - CCP Managing risks of hazardous chemicals in the workplace Dec 2022
Document in Emergency Response Plans to contact Fire Brigade in the instance chemical spill occurs that is the responsibility of the site to contain and clean up. Document in ERPs to contact EPA in the instance of Chemicals leaving the boundary of the property.	- Safety Data Sheet - Dangerous Goods Act - Protection of the Environment Operations Act (NSW) - CCP Managing risks of hazardous chemicals in the workplace Dec 2022
Underground stormwater GPT tanks, collected by Sydney water annually.	- Safety Data Sheet - Protection of the Environment Operations Act (NSW).
NIL	- Safety Data Sheet - Protection of the Environment Operations Act (NSW) - CCP Managing risks of hazardous chemicals in the workplace Dec 2022

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Environmental - Aspects & Impacts Register						
No.	Environmental Aspect	Impact	Existing Controls	Consequence [1]	Likelihood [2]	Inherent Impact Rating (See Risk Matrix)
Releases to land						
12	Spills of fuel from trucks rupturing diesel tanks on site or on public road.	Adverse Effects - Contamination of soil or groundwater. Impairment to human health, flora and fauna due to contamination of waterways.	Line marking and engineering controls to lay out designated parking bays and docks, within Traffic Management Plan. Spill kits and training provided. Trained personnel are permitted to work at sites via the National Driver Database. Workplace inspections are regularly completed to maintain adequate housekeeping.	Level 3	Unlikely	Low
13	Spill from use of diesel fuel for emergency generator.	Adverse Effects - Contamination of soil.	Line marking and engineering controls to lay out designated parking bays and docks, within Traffic Management Plan. Spill kits and training provided.	Level 1	Unlikely	Very Low
Use of raw materials and natural resources						
14	Use of water in staff kitchens, cafeteria, toilets, showers and on gardens.	Adverse Effects - Use of finite resource.	Dual flush toilets. Waterless urinals in place in some DCOs to reduce water use. Storm water captured for reuse in cleaning in some DCOs. Facilities and Maintenance department need to report on and track water volume consumption.	Level 2	Likely	Medium
Use of energy						
15	Use of electricity for lighting, air conditioning, computers, monitors, temperature controlled warehouses, insect detectors, photocopyers and other equipment.	Adverse Effects - Computers, printers and monitors left switched on overnight. Lighting left switched on internally and externally, 9.8 metric tonnes of CO2 emissions annually. [3]	LED Lighting installed in some distribution centres with sensors, connected to daylight harvesting sensors, to switch lights off when no motion is detected. Insect detectors switch off during winter. Photocopiers and other equipment automatically switch off during non-staffed hours in some locations.	Level 2	Almost Certain	Medium
16	Electricity used for charging of Forklift and MHE batteries.	Adverse Effects - Increased landfill waste. Increase in CO2 emissions. https://www.cleanup.org.au/PDF/au/cua_paperandcardboard_fact_sheet.pdf	Pick paths are set to reduce travel time and energy consumed. Forklifts are regularly serviced and maintained. Disposal of old batteries regularly to keep the batteries efficient. Batteries are collected by a licensed provider.	Level 2	Possible	Low
17	Gas use for cooking in staff canteens.	Adverse Effects - Use of fossil fuel. Benifical Effects - Less harmful in terms of CO2 emissions than electrical appliances.	Trained cooks and personnel operating gas equipment. Kitchen closed and staff access only for trained personnel.	Level 1	Unlikely	Very Low
18	Waste stations in reclaim and released of wastewater.	Adverse Impacts - Releases of waste water from salvagereclaim areas which can cause imbalance to the pH levels in the waste water and impact flora and fauna.	Release of caustic soda to treat pH on wastewater. 24 hour monitoring of waste water by a licensed contractor.	Level 2	Unlikely	Low
Relevant Legislation, Licenses, Standards and Risk Assessments						
*NSW Protection of Environment Operations Act *AS 4897, The design, installation and operation of underground petroleum storage systems. - Dangerous Goods Act *COP Managing risks of hazardous chemicals in the workplace Dec 2022 * Dangerous Goods Act * Safety Data Sheet * Protection of the Environment Operations Act (NSW) * COP Managing risks of hazardous chemicals in the workplace Dec 2022 * Protection of the Environment Operations Act (NSW) * Safety Data Sheet * Protection of the Environment Operations Act (NSW) * Protection of the Environment (Clean Air) Regulations (NSW) * COP Managing risks of hazardous chemicals in the workplace Dec 2022 * Safety Data Sheet						

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Environmental - Aspects & Impacts Register						
No.	Environmental Aspect	Impact	Existing Controls	Consequence [1]	Likelihood [2]	Inherent Impact Rating (See Risk Matrix)
Waste and by-products						
19	Hydraulic oils, oily rags and used equipment used for equipment and servicing.	Adverse Effects - Add to landfill waste.	Licensed contractor disposes of waste oils, lubricants and oily rags.	Level 1	Unlikely	Very Low
20	Fluorescent Globes used in lighting.	Adverse Effects - Add to landfill waste.	Used globes are disposed of by licensed contractor.	Level 1	Unlikely	Very Low
21	High bay light globes containing mercury vapour.	Adverse Effects - Add to landfill waste.	Lights and batteries are disposed of by licensed contractor.	Level 1	Unlikely	Very Low
22	Generation of waste paper & cardboard in office.	Adverse Effects - Add to landfill waste. Increase in CO2 emissions. Cut down of trees, use of water in creating new paper. Greenhouse gas emissions transporting recycling materials.	Power and cardboard recycling bins on site. Compactors on site to reduce transport remove waste from site. Separate waste bins for different waste streams.	Level 2	Possible	Low
23	Electronic waste, batteries, ink cartridges, cables, computer and computer parts.	Adverse Effects - Add to landfill waste. Toxic e waste. Contaminating soil, waterways, flora and fauna.	Bins provided near the IT store room for all electronic waste and organic e-waste to safely dispose of.	Level 3	Almost Certain	High
24	Broken pallets.	Adverse Effects - Broken pallet boards increasing landfill.	Free collection of non-standard pallets by customers/vendors. Also made available for reuse. Broken pallet boards are separated into cages and sent back to pallet provider.	Level 1	Unlikely	Very Low
25	Food waste from obsolete stock and food consumed on site.	Adverse Effects - 60% of landfill in Australia is food waste.	Food bank and Oz Harvest receive food that is still safe to consume but has surpassed its shelf-life. A licensed provider disposes of milk. Sites have a waste management plan. Licensed provider engaged to collect waste oils.	Level 1	Unlikely	Very Low
26	Cooking Oil from canteen kitchens.	Adverse Effects - Increased landfill.	Licensed provider engaged to collect old oil.	Level 1	Unlikely	Very Low
27	Empty chemical bottles.	Adverse Effects - Increased landfill. Chemicals disposed of by licensed contractor.	Licensed provider engaged to collect old oil. Recyclable containers separated in waste streams for household chemicals in use.	Level 1	Unlikely	Very Low
28	Empty Gas bottles.	Adverse Effects - Increased landfill. Empty gas cylinders reused and recycled by provider of cylinders.	Recycling of empty gas bottles. Some sites have 1 large Gas Refill station, eliminating use of cylinders.	Level 1	Unlikely	Very Low
29	Plastic wrapping from pallets.	Adverse Effects - Increased landfill.	Shrink wrap bins, compactors and recycling. Licensed provider collects plastic for recycling.	Level 2	Possible	Low
30	Pails (Scrap metal) from Machinery.	Adverse Effects - Increased landfill. Scrap metal collected by a licensed provider.	Licensed provider collects plastic for recycling. Sites have a waste management plan.	Level 1	Rare	Very Low
31	Empty spray aerosol cans from facilities and maintenance workshops.	Adverse Effects - Increased landfill. Empty chemical containers disposed of by licensed contractor.	Segregation of different classes of chemicals. Licensed provider. Sites have a waste management plan. Designated collection bin and contract removal.	Level 1	Unlikely	Very Low
32	Cans and bottles from food product.	Adverse Effects - Increased landfill.	Spray cans - designated collection bin and contractor removal. Separate bins to separate for recycling. Waste collected by licensed provider.	Level 1	Unlikely	Very Low
33	Spill kits used for cleanup of spills.	Adverse Effects - Increased landfill. Hazardous chemicals disposed of with licensed providers, not to landfill.	Sites have a waste management plan. Used spill materials are collected by a licensed provider. Worker incidents and training for cleaners.	Level 1	Unlikely	Very Low

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Environmental - Aspects & Impacts Register						
No.	Environmental Aspect	Impact	Existing Controls	Consequence [1]	Likelihood [2]	Inherent Impact Rating (See Risk Matrix)
Noise						
34	Trucks on streets using air brakes.	Adverse Effects - Airbrake noise interfering with surrounding environment e.g. interrupting ability to sleep. Noise interfering with beneficial use of environment for surrounding businesses e.g. motels, hospitals. Littering of streets near distribution centres.	Distribution Centres situated in industrial estates, away from Houses. Trained, licensed and authorised forklift truck drivers only. Noise monitoring conducted to determine sources of noise and consider solutions. Elimination/reduction. No MHE operated on streets/roads. Vehicles parked in designated parking areas. Vehicles occur within site perimeter and largely in protected/indoor areas. Site speed limits reduce noise from vehicles.	Level 2	Rare	Very Low
35	MHE Movements.	Adverse Effects - Noise of horns and loading and unloading of trucks/trailers/containers interfering with beneficial domestic and recreational use of household environment. e.g. interrupting ability to sleep. Noise interfering with beneficial use of environment for surrounding businesses e.g. motels, hospitals.	Distribution Centres situated in industrial estates, away from Houses. Trained, licensed and authorised forklift truck drivers only. Noise monitoring conducted to determine sources of noise and consider solutions. Elimination/reduction. No MHE operated on streets/roads. Vehicles parked in designated parking areas. Vehicles occur within site perimeter and largely in protected/indoor areas. Site speed limits reduce noise from vehicles.	Level 2	Rare	Very Low
36	Personal Address Systems.	Adverse Effects - Noise interfering with household beneficial domestic and recreational use of home environment e.g. interrupting ability to sleep. Noise interfering with beneficial use of environment for surrounding businesses e.g. motels, hospitals.	Distribution Centres situated in industrial estates, away from Houses. Environmental noise monitoring conducted at sites to identify sources of noise and consider solutions. Elimination/reduction.	Level 2	Rare	Very Low
37	Radios being played on shifts.	Adverse Effects - Noise interfering with household beneficial domestic and recreational use of home environment e.g. interrupting ability to sleep. Noise interfering with beneficial use of environment for surrounding businesses e.g. motels, hospitals.	Distribution Centres situated in industrial estates, away from Houses. Environmental noise monitoring conducted at sites to identify sources of noise and consider solutions. Elimination/reduction.	Level 2	Rare	Very Low

* Protection of the Environment Operations Act (NSW)
* National Environment Protection Council Act (NSW)