

Blayney Site

Pollution Incident Response Management
Plan

Effective
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1.0 Introduction

The Blayney site maintains a *Safety, Health and Environmental Management System*. The system supports pollution prevention, risk management and emergency response, and is certified as complying with International Standards ISO 14001 and OHSAS 18001.

This document outlines the plan for responding to pollution incidents at the Blayney site, and references parts of the *Safety, Health and Environmental Management System* where relevant. It makes particular reference to the *Emergency Response Procedure* and *Crisis Management Plan* and how they contribute to Pollution Incident Response and management. These are separate documents for use by factory employees.

- The Emergency Response Plan provides the process for an initial response to emergencies such as fire, medical emergency, hazardous substance incidents / chemical spill, civil disturbance and blackout. This is achieved by deploying the trained Emergency Response Team (ERT) to control or limit the event, and moving people to safety where relevant.
- The Crisis Management Plan provides instruction to site management about the process to be followed if there is a serious event that extends beyond an initial emergency response. This includes significant pollution events.

2.0 Notification and Response

a) Identification and escalation of issues

Employees are instructed to report any environment, safety or property incidents to their Line Manager, and to utilise pull flaps to activate the emergency alarm when required.

There are also automatic triggers for the initiation of the alarm process (fire detectors). The *Emergency Response Procedure* details the site alarm and evacuation processes. This includes audible alarms and provision of dedicated evacuation areas. Also included are process such as conducting roll calls to account for personnel, search processes and facilitating interaction with emergency services departments.

If an environmental incident occurs that is a potentially notifiable pollution event it is escalated to the Factory Manager, Karl Nealon. The Factory Manager consults any relevant site staff and co-ordinates the involvement of Corporate Staff to assess if a notifiable pollution incident has occurred.

b) External Notification

The emergency process includes an alarm system. Activation of this system results in automatic notification of NSW Fire Services. It also encompasses an audible alarm / PA notification system.

If it is determined that a notifiable environmental incident has occurred the Factory Manager will assign responsibility to execute the immediate notification of an event to the Environment Protection Authority and any other relevant parties. The 24 hour contact number for the EPA Pollution Line is 131 555, and the number for the local office is 02 6332 7600. In the event Corporate Staff have assessed that there is a notifiable incident, notification must be made via the Pollution Line.

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It is understood that information provided in a notification is outlined in clause 150 of the POEO act:

150 Relevant information to be given

- (1) *The relevant information about a pollution incident required under section 148 consists of the following:*
- (a) *the time, date, nature, duration and location of the incident,*
 - (b) *the location of the place where pollution is occurring or is likely to occur,*
 - (c) *the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,*
 - (d) *the circumstances in which the incident occurred (including the cause of the incident, if known),*
 - (e) *the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,*
 - (f) *other information prescribed by the regulations.*
- (2) *The information required by this section is the information known to the person notifying the incident when the notification is required to be given.*
- (3) *If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.*

The nature of the hazards associated with the plant and the buffer distances to neighbouring residents has led to the identification of no owners or occupiers in the vicinity of the premises. In the event that any neighbouring rural properties may be affected visiting any potentially affected properties is a practical method. In the event of a release to waterway the most appropriate contact has been identified as the local Council authority. Blayney Shire Council contact number is 02 6368 2104. Other Authorities that may be relevant are Workcover on 131 050, Ministry of Health 02 9391 9000 and Fire and Rescue 02 9265 2999.

c) Contact persons

There is 24 hour site contact available through security / administration office. The contact number is 02 6391 7500. Contact during initial stages of any emergency / crisis can be directed to this number until any appropriate alternate contacts are established.

The ERT emergency warden guides the ERT and co-ordinates their activities with emergency services during initial stages of an emergency. The Factory Manager, Karl Nealon will ensure that resources and personnel are allocated to any event. The Security office, the *Emergency Response Procedure* and *Crisis Management Plan* contain details of persons and contacts that can be utilised dependent upon the situation.

3.0 Overview of Hazards

The purpose of this section is to provide an overview of key hazards associated with the licenced activities undertaken at the site. The activities licenced with the EPA are:

- Agricultural Processing
- Livestock Processing Activities

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Following is information about the significant hazards associated with the licenced activities:

Hazard: Stormwater pollution from large chemical spill

Control Actions: Tanker truck unload area drains to bund, unloading procedures, bunds around tanks and storage areas, wastewater pit bund, first flush stormwater capture dam, stormwater retention dam / valve, spill control equipment (drain covers and absorbent), trained emergency response team, security patrol inspections
 Other potential actions: utilise waste contractor with vacuum tanker, close retention dam valve
 Likelihood: Extremely unlikely to occur
 Potential pollutant quantity: phosphoric acid tanks (20 + 30KL) sodium hydroxide tank (20KL), corrosive chemical stores (2*2KL), flammable liquid store (2KL), oils and lubricant (5KL), LPG (7.5t)
 Conditions / events that could increase likelihood: rain, fire, truck tanker unloading

Hazard: Stormwater pollution from large spill of liquid raw materials

Control Actions: Tanker truck unload area drains to bund, unloading procedures, bunds around tanks and storage areas, wastewater pit bund, first flush stormwater capture dam, stormwater retention dam / valve, spill control equipment (drain covers and absorbent), trained emergency response team, security patrol inspections
 Other potential actions: utilise waste contractor with vacuum tanker, close retention dam valve
 Likelihood: Extremely unlikely to occur
 Potential pollutant quantity: 75t liquefied meats, 130t liquid digest & tallow
 Conditions / events that could increase likelihood: rain, fire, truck tanker unloading

Hazard: Stormwater pollution from spill of raw wastewater

Control Actions: Tanker truck unload area drains to bund, unloading procedures, bunds around tanks and storage areas, wastewater pit bund, first flush stormwater capture dam, stormwater retention dam / valve, spill control equipment (drain covers and absorbent), trained emergency response team, security patrol inspections, alarms, preventative maintenance program
 Other potential actions: utilise waste contractor with vacuum tanker, cease wastewater generation, close retention dam valve
 Likelihood: Unlikely to occur
 Potential pollutant quantity: average generation of approximately 60KL per day
 Conditions / events that could increase likelihood: rain, fire, blackout

Hazard: Stormwater pollution from discharge of poorly treated effluent

Control Actions: wastewater treatment equipment and management procedures, security staff inspections, preventative maintenance programs
 Other potential actions: utilise waste contractor with vacuum tanker, cease wastewater generation, and increase irrigation
 Likelihood: Unlikely to occur
 Potential pollutant quantity: average generation of approximately 60KL per day
 Conditions / events that could increase likelihood: rain, fire

Hazard: Poor local air quality from dust emissions

Control Actions: process air treatment equipment (cyclones, bag-house filters, ducting of manufacturing process air to wet scrubbers and biofilter), preventative maintenance programs
 Other potential actions: not identified
 Likelihood: Extremely unlikely to occur
 Potential pollutant quantity: not stored / readily quantified
 Conditions / events that could increase likelihood: not identified

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Hazard: Dust explosion from organic dust

Control Actions: process air treatment equipment (cyclones, bag-house filters, ducting of manufacturing process air to wet scrubbers and biofilter), preventative maintenance programs, smoking restrictions, cleaning programs, trained emergency response team and general awareness training, engineering controls of potential ignition sources

Other potential actions: utilise waste contractor with vacuum tanker to control fire water

Likelihood: Extremely unlikely to occur

Potential pollutant quantity: not readily quantified / stored

Conditions / events that could increase likelihood: fire, internal process dust leaks, breach of smoking rules

Hazard: Poor local air amenity due to odour

Control Actions: process air treatment equipment (cyclones, bag-house filters, ducting of manufacturing process air to wet scrubbers and biofilter), preventative maintenance programs, wastewater treatment equipment and management procedures, security staff inspections

Other potential actions: not identified

Likelihood: Likely to occur

Potential pollutant quantity: not stored / readily quantified

Conditions / events that could increase likelihood: wastewater plant disruption

The likelihood ratings follow the definitions used by Nestle Oceania during risk assessments, these being:

Almost certainly will occur: consequence expected to occur on a weekly basis or more frequently

Good chance it will occur: consequence expected to occur more than once in 3 months, but less than once a week

Likely to occur: consequence expected to occur more than once a year, but less than once in 3 months

Unlikely to occur: consequence expected to occur more than once in 3 years, but less than once a year

Extremely unlikely to occur: consequence has not occurred and is expected to occur less once in 3 years.

4.0 Pollution response training, testing and updating of plan

The nature and objectives of training related to this plan is to provide understanding and competency with respect to preventing pollution events, reporting incidents, and responding to emergencies and crisis situations. Key elements of the *Safety, Health and Environmental Management System* that relate to pollution response are:

- An *induction program* that is in place for new employees, site visitors and contractors. These include instruction about environmental commitments, preventing pollution events and reporting of incidents. These are implemented as required.
- Emergency management. The actions taken during an emergency assist the prevention of pollution incidents and controlling / reducing any potential pollution. The site process for emergency response is contained within the *Emergency response procedure*. A trained Emergency Response Team (ERT) has been created for this purpose. Annual training, scenarios and evacuations are undertaken as part of the emergency response plan.

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Following are training and test dates in the emergency response program:

2017	ERT on site scenarios: Emergency evacuation trials: ERT off-site skills training:	13 th , 20 th , 27 th October and 3 rd November 13 th , 20 th , 27 th October and 3 rd November 3 rd , 10 th , 17 th and 24 th February
2016	ERT on site scenarios: Emergency evacuation trials: ERT off-site skills training:	14 th , 21 st , 28 th October and 4 th November 14 th , 21 st , 28 th October and 4 th November 29 th April, 6 th , 13 th and 20 th May
2015	ERT on site scenarios: Emergency evacuation trials: ERT off-site skills training:	16 th , 23 rd 30 th October 16 th , 23 rd 30 th October 13 th , 20 th & 27 th March
2014	ERT on site scenarios: Emergency evacuation trials: ERT off-site skills training:	26 th September, 3 rd and 10 th October 26 th September, 3 rd and 10 th October 21 st , 28 th March and 4 th May
2013	ERT on site scenarios: Emergency evacuation trials: ERT off-site skills training:	11 th , 18 th and 25 th October 11 th , 18 th and 25 th October 12 th , 19 th April and 17 th May
2012	ERT on site scenarios: Emergency evacuation trials: ERT off-site skills training:	12 th , 19 th and 26 th October 12 th , 19 th and 26 th October 16 th , 23 rd and 30 th March
2011	ERT on site scenarios: Emergency evacuation trials: ERT off-site skills training:	14 th , 21 st and 28 th October 14 th , 21 st and 28 th October 15 th , 22 nd and 29 th July

Training and scenario testing was coordinated by Mines Rescue Pty Ltd.

- The Crisis Management process is also tested. On April 17th 2012 crisis management scenarios were performed as part of the MRQ process.

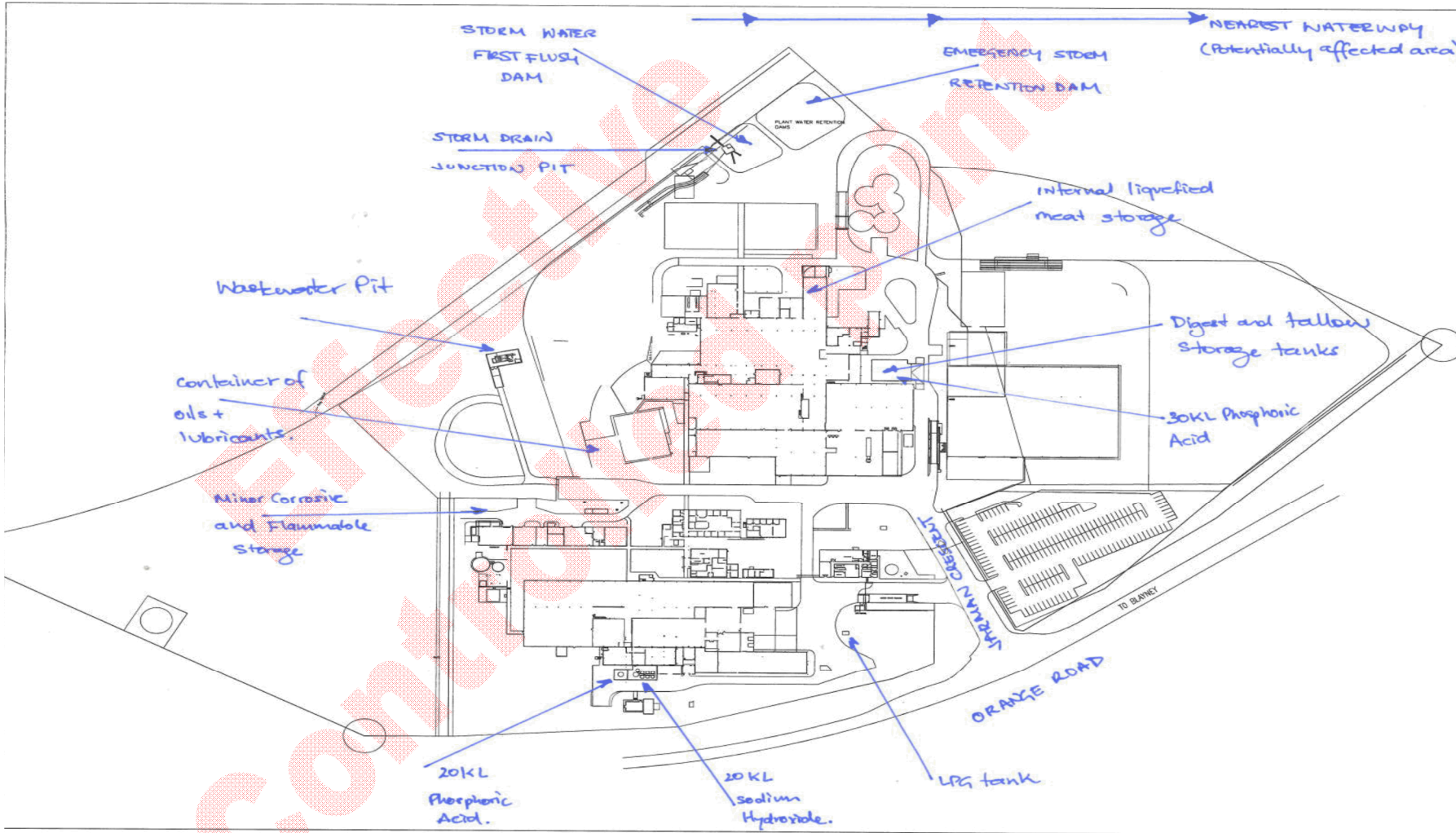
Testing of the *Emergency Response Procedure* and *Crisis Management Plan* represents the practical components of pollution minimisation and response.

The *Safety, Health and Environmental Management System* was externally certified by SGS Systems and Services Certification Pty Ltd in June 2009, and recertified in March 2015. This *Pollution Incident Response Plan* was created to enable public posting by 1st September 2012.

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5.0 Maps and potential pollutants

The following map shows the layout of the site, major liquids and chemical storage areas, and the key stormwater junction / storage points. Drains outside the building flow to the stormwater junction point (excepting bund and liquid unloading area drains which flow to wastewater pits).



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Document Change Record

Version	Date	Details of Changes	Approver
4.0	05/02/2018	Updated emergency training dates.	D Baldwin
3.0	13/01/2016	Changed factory Manager to Karl Nealon Updated Training Table Added Other Authorities that may be relevant are - Ministry of Health 02 9391 9000 and Fire and Rescue 02 9265 2999. ISO recertification date- March 2015 Added to external communication- "In the event Corporate Staff have assessed that there is a notifiable incident, notification must be made via the Pollution Line".	D Baldwin

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