Pollution Incident Response Management Plan

1. Introduction

Nestlé Smithtown 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 Nestlé Smithtown and refers to components of the Emergency Response Procedure (0314-SHE-SOP- Emergency Response Procedure), Crisis Management Guideline (0314-HR-GUI-Nestlé Crisis Management Guideline) and other relevant documents maintained within the site document control system. These documents are available for use by factory employees and a copy of the emergency response procedure is also provided to relevant emergency service teams within the area. Details of this can be obtained within the Emergency Response Procedure. Documents used at Smithtown are managed through a document control procedure which includes biennial reviews.

The Emergency Response Procedure describes the process and systems in place for managing emergency situations at the Nestlé Smithtown Plant including safety and environmental incidents and covers:

- Roles and Responsibilities
- Detailed evacuation process
- Use of emergency equipment
- Potential hazards on site, their likelihood and specific actions in case of emergency
- Reference to relevant maps and documents associated with the emergency response plan.

The Crisis Management Guideline provides instruction to site management about the process to be followed if there is an event of public concern or a threat to the immediate safety of personnel on-site. The guideline defines the first 120 minutes of a crisis.

2. Notification and Response

Identification and escalation of issues and External Notification

Employees are instructed to report any environmental, safety or property incidents to their Line Manager, and to activate the emergency alarm when required. There are also automatic triggers for the initiation of the alarm process. The Emergency Response Procedure details the site alarm and evacuation processes. The site Emergency Response Team (ERT), Wardens and Chief Wardens have specific tasks outlined in the Emergency Response Procedure in the case of an alarm being triggered. This includes the process for notifying emergency services (including 000 if necessary) and other external parties as required.

If an environmental incident occurs that is a potentially “notifiable” pollution event it is escalated to the Factory Manager. Relevant site employees are then consulted and the involvement of Corporate Staff to assess if a “notifiable pollution incident” has occurred is co-ordinated. If it is determined that this is the case, the Factory Manager will assign responsibility to execute the immediate notification to the Environment Protection Authority and any other relevant parties.

It is understood that information provided in a notification is outlined in clause 150 of The Protection of the Environment Operations Act (POEA) 1997:

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.

Should the incident pose an immediate threat to neighbouring premises the Factory Manager or their designate will instruct the Communications Controller to commence contacting neighbours by telephone or by sending runners.

Contact persons
During business hours, the contact point is the Receptionist/ Switchboard Operator who will liaise with the relevant personnel within the factory. They can be contacted on 02 6560 4000 and outside business hours, the Communications Controller will be the Scott Plant TCO on site who can be contacted on 02 6560 4379.

The Chief Warden guides the Emergency Response Team and co-ordinates their activities with emergency services during initial stages of an emergency. The Factory Manager will ensure that resources and personnel are allocated to any event. The Crisis Management Guideline contains details of persons and contacts that can be utilised dependent upon the situation. This document is available for key personnel on site who may require contact details in an emergency situation.

Position	Responsibility
Factory Manager	Responsible for activating the PIRMP and managing response to pollution incident.
SHE Manager	Maintain and update the Emergency Response Procedure.
Chief Warden	Responsible for implementing the Emergency Response Plan &/or Crisis Management Guideline.Responsible for implementing the Emergency Response Plan &/or Crisis Management Guideline.

Contact names and numbers are not included in this plan for protection of individual privacy. They are contactable through the Switchboard numbers above.

External Notification Contact Details (to be contacted in the following order);

Agency	Contact Details
Fire and Rescue NSW	000 (first call if incident presents an immediate threat to human health or property otherwise last point of contact)
NSW Environmental Protection Authority (EPA)	131 555
NSW Ministry of Health	(02) 4924 6477 (ask for Public Health Officer on call)
SafeWork NSW	131 050
Kempsey Shire Council	(02) 6566 3200 (for urgent matters)

3. Hazard Identification

Potential environmental hazards are identified in the site Emergency Response Procedure including level of risk and specific actions should an incident occur.

This section will provide an overview of key environmental hazards that may be associated with licensed activities.

Excess Pollution from WWTP
Control Actions: Automatic caustic dosing system, Monitoring system, Daily Operational Checks, EPA license compliance
Likelihood: Unlikely to occur
Conditions/events that could increase likelihood: DO probe failure, Insufficient maintenance
Nestlé Smithtown holds an EPA license. In the unlikely event that excess pollution from the Waste Water Treatment flows into the river, specific actions should be taken as per the license

Odour from WWTP
See: 0314-SOP-SHE-Air Emissions Including Noise and Odour
Control Actions: Automatic caustic dosing system, Monitoring system, Daily Operational Checks
Likelihood: Likely to occur
Conditions/events that could increase likelihood: Run out of caustic. Consistent cold weather freeze caustic supply. Abnormally high food load sent to WWTP. High volume steam dumping increase aerated water temperature.

Excessive Noise
Note there are no EPA restrictions on Noise at this present time for this site.
See: 0314-SOP-SHE-Air Emissions Including Noise and Odour
Control Actions: Noise curfews- Noisy equipment, such as outdoor forklifts not operated between 7pm and 7am.
Likelihood: Likely to occur
Conditions/events that could increase likelihood: Start-up issues, equipment failures

Storm water/River/Other Environment Pollution from large chemical spill
Control Actions: Chemicals stored in bunded areas. Storm water drains colour coded to be separated from trade waste drains
Likelihood: Unlikely to occur

Dust emissions from Nesquik
Control Actions: Wet Scrubber installed to prevent dust emissions

Likelihood: Unlikely to occur
Conditions/events that could increase likelihood: Failure of wet scrubber

High boiler stack emissions
Control Actions: Multiclone cyclone removes dust. Ringlemann Smoke tests completed to highlight any issues
Likelihood: Unlikely to occur
Conditions/events that could increase likelihood: Insufficient boiler maintenance

A Dangerous Goods Locations Map (0314-SHE-SOP-Dangerous Goods Location Map), outlining chemical storage locations, is available for use by factory employees and emergency services as required.

4. Pollution response training, testing and updating of plan

An induction program is in place for new employees, site visitors and contractors. This includes instruction about environmental commitments, preventing pollution events and reporting of incidents. These are implemented as required. Employees are also re-inducted on a regular basis.

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. Training and evacuation records are maintained on site.

Testing of the Emergency Response Procedure represents the practical components of pollution minimisation and response. This includes evacuation drills held on a yearly basis as a minimum.