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2 Introduction

The Pollution Incident Response Management Plan (PIRMP) is designed to improve the way pollution incidents are reported, managed and communicated to the general community, as well as comply with the legislative requirements outlined in the *Protection of the Environment Legislation Amendment Act 2011*.

The objectives of the PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to company personnel, the Environmental Protection Authority (EPA), other relevant authorities, and persons living nearby who might be affected by a pollution incident.
- Minimise and control the risk of a potential pollution incident through the identification of risks and the development of actions to minimize and manage the potential risks.
- Ensure competent, trained personnel implement and manage the plan; regularly testing it for accuracy, currency and suitability.

The PIRMP must be kept on Site and be readily available upon request.

If a pollution incident occurs, the plan must be immediately implemented. A pollution incident is described as:

“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 premises, but it does not include an incident or set of circumstances involving only the emission of any noise”

(E.P.A. Environmental Guidelines 2012)

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

Under section 147 of the *Protection of the Environment Operations Act 1997* (POEO Act) pollution incident that must be reported is defined as an incident where there is risk of material harm to the environment.

Material harm is defined as:

- Actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- Incident which results in actual or potential loss or property damage of an amount exceeding \$10,000 (including the reasonable costs and expenses that would be incurred taking all practicable measures to prevent, mitigate or remediate an incident).

Pollution incidents must be reported immediately (promptly and without delay) to the EPA, NSW Health, Fire and Rescue NSW, Work Cover NSW and the local Council. Contact details are outlined in 7.1 (below).

3 Description and Likelihood Matrix

DESCRIPTION	LIKELIHOOD RATING	RISK	RATIONALE
Ammonia Leak	Medium	Low	Gas detection alarms in place in the Muller and Main Engine rooms. Ammonia seeks moisture and is a dense gas that would be dispersed through the drain system before making its way outside. An alarm is in place in Security gatehouse. Guards patrol premises every four hours and check alarms outside of site hours.
Chemical Spill	Medium	Moderate	Chemicals stored in relatively small quantities in secure, locked locations. Bunding in place to contain spills. Spill kits located throughout the Plant. SDSs kept for all chemicals physically in three locations (First Aid Room, Bundy Room, and Security Gatehouse) and through the ChemAlert Database online.
Wastewater Overflow	Medium	Low	Overflow goes down old pipework to the Farm where it is screened. A bund extends for several hundred meters to keep any overflow at the farm from entering the adjacent river.
Explosion	Low	High	Few explosive compounds kept on Site. Hazardous Chemical Store located in isolated area. LPG gas tank located in open area. Boiler house might constitute potential source of explosion. Safeguards in place and regular checks conducted by trained contractors and Site personnel.
Fire	Low	High	Fire detection systems in place and evacuation procedures clearly detailed and regularly tested (as outlined above).
Asbestos Contamination	Low	High	Large quantities of asbestos throughout the Site. Regular stabilization and monitoring activities in place, with long-range removal plan.

4 Pre-emptive Actions

A pro-active approach to minimizing potential harm to the environment is an extension of the Simplot Safety credos that seeks to continuously improve safety across the entire corporation.

Pre-emptive actions include:

- Spill containment kits located in appropriately designated areas;
- Concrete bunding for chemical, diesel and waste drum storage areas;
- Drainage diverted through wastewater treatment plant;
- Bunded and catchment pools on farm to contain potential overflows;
- Monthly Grounds Audits and permanent dedicated grounds man;
- Fire monitoring system; appropriate extinguishers throughout Plant; regular maintenance and safety audits;
- Asbestos monitoring program and regular sealing of any deteriorated areas.

5 Inventory of Pollutants

A list of all cleaning chemicals is maintained on the chemical stock inventory spreadsheet (S:\Cleaning folder).

Other potential pollutants on Site include:

Bulk Stored Liquids and Gases	Maximum Quantity on Site
Ammonia	25 tonne
Sodium Hydroxide	4,000 litres
Sulphuric Acid	2,000 litres
Tsunami	2,000 litres
Chlorine	200 litres
Waste water system (DAF)	220,000 litres
Sludge storage tank	25,000 litres
LPG	4,000 litres
Diesel	5,000 litres
Tallow	18 tonne
Waste oil	18 tonne

6 Safety Equipment

Simplot is committed to the safety of all staff members and visitors to the site.

Personal Protective Equipment (P.P.E.) must be worn by all staff and visitors whilst in the Plant. This includes safety glasses, hearing protection, safety footwear and high-visibility protective clothing

Fire extinguishers, gas reading meters and Compressed Air Breathing Apparatus (CABA) are located in pertinent areas and staff required to use them receive regular refresher training.

7 Contact Details

7.1 External Notifications

A notification protocol exists for alerting the relevant authorities about a pollution incident.

If the incident presents an immediate threat to human health or property 000 should first be dialed, as Fire and Rescue NSW, the NSW Police and NSW Ambulance Service are the initial responders responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, the relevant authorities should be notified in the following order:

- The appropriate regulatory authority (ARA) for the activity under the POEO Act. This is usually the EPA or local authority (local council, see below for contact details).
- The EPA, if it is not the ARA, - phone Environment Line on 131 555.
- The Ministry of Health via the local Public Health Unit 6330 5311.
- The Work Cover authority – 13 10 50
- The local authority if it is not the ARA:
 - Bathurst Regional Council

General Enquiries	6333 6111
Environment/Health	6333 6511
Engineering	6333 6100

- Fire and Rescue NSW (if not previously alerted) 6332 5634

7.2 Internal Notifications

Any pollution incident will be managed by Senior Management via the Site ECO. The contact details for the Bathurst Site’s senior incident coordinators are listed below:

Plant Manager	0438 429 088	6330 2538
Maintenance Manager	0429 148 505	
Production Manager	0428 252 481	6330 2428
Area Manager – Process	0448 185 678	6330 2457
Area Manager – Packaging	0428130237	
Area Manager - Logistics	0477 129 845	
Quality Manager	0458 347 313	6330 2423
Trade Waste & Environment Coordinator	0419 754 426	6330 2640

8 Communication Strategies

The individuals occupying the position descriptions above (in 6.2) are responsible for coordinating the notification of a pollution incident to the appropriate regulatory authorities.

Any media releases will be made by the Plant Manager or their nominated deputy.

The designated method of informing nearby residents of any incident which might affect them or their property will be via door knocking and letterbox drops, and if required, regular communication briefings.

9 On Site Harm Minimization

The safety of all employees, contractors and visitors at the Bathurst Production Facility is paramount in the daily operation of the Plant. Safety comes before anything else.

Emergency procedures, including detection, alerts and evacuation are outlined in the Site Emergency and Evacuation procedure.

10 Pollution Controls

Preventative pollution controls are utilized throughout the Bathurst Site. These include measures such as storing hazardous substances in secure areas, bunded storage sites to contain potential spills, and maintaining spill control kits around the Plant.

A weir is located on the storm water drainage creek that can capture small scale spills before they have the potential to move further downstream into permanent watercourses. This storm water drain runs beneath the Site and meanders across the adjacent Simplot farm. In an emergency, temporary weirs could be installed on this drain to contain any pollutants.

A bunded drain extends for roughly one kilometre from the Pump house on the farm to a series of collection ponds located over 100m from the river, to prevent waste-water entering the river in the event of a pump failure.

11 Training

The Bathurst Plant has a strong commitment to training. This is reflected by the employment of a full time training advisor. Staff are routinely trained in several emergency related fields including first aid, fire awareness and containment, and spill management.

All personnel affected by the content of the Bathurst Emergency Procedures (incorporating the PIRMP) will receive instruction on the relevant parts of the document related to their role.