SITE POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

PineGro Products Pty Ltd

69 Mazamet Road, Goulburn NSW.



EPA Licence No. 20727

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# ****Document Control****

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| --- | --- | --- | --- |
| **Issue** | **Date** | **Revision Changes** | **By** |
| 2 | 17/02/2020 | Reconstruct PIR Plan | HSEQ |
| 3 | 16/03/2021 | Completed the Dangerous and Combustible Goods Manifest | HSEQ |
| 4 | 09/02/2022 | Changes site operating hours and version control | HSEQ |
| 5 | 15/03/2022 | Added training sign off at last page | HSEQ |
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# Current Revision

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| --- | --- | --- | --- | --- |
| **Date Implemented** | **Version** | **Approval Position** | **Test / Schedule** | **Next Review** |
| 17/02/2021 | 2 | General Manager | 1 Year | 167/03/2022 |

# Licensee Details

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Licensee Name** | **ABN** | **Address** | **Phone** | **Prime Contact Person** |
| PineGro Products Pty Ltd | 72 005 531 546 | 37-69 Mazamet Road, Goulburn NSW 2580 | 03 5367 3222  0418 369 461 (24hr) | John Van Meel  General Manager |
| **Website** | **Licence No:** | **Scheduled Activity** | **Fee based Activity** | **Site Manager** |
| pinegro.com.au | 20727 | Composting | >5,000 - 50,000T annually to receive organics | Alan Sekulic  Ph: 0488 584 140 |

# Purpose

The purpose of this plan is to outline the site procedure to be followed when responding to a pollution incident to minimise environmental and business impact and to ensure a pollution incident is managed in an effective manner.

This procedure has been developed to outline the actions required by site management and Senior Management in the event of a pollution incident. A pollution response procedure is required as part of the site Environmental Protection License and can been made available to members of the public on the PineGro company website or by written request to the site.

The procedure covers potential pollutant hazards and controls and the sites incident response process should a pollution incident occur. Due to unpredictability of incidents and emergency situations it must be understood that some circumstances may arise that are not covered by this procedure but those identified in our site Emergency Management Plan have been included.

This plan does not replace or supersede the site Emergency Management Plan that may also be operational at the same time to manage other types of emergency situations. Upon activation of the pollution response plan the site management team can request the assistance of Senior Management Team.

# Introduction

PineGro Goulburn site is situated at the southeastern end of Mazamet Road within the Mulwaree local government area in NSW and occupies the main portion of the old Wool Scouring facility site that comprises 56600m² of land.

The facility includes an employee car park and a large portion of vacant land, administration building, manufacturing area, raw material shed, distribution storage and two water dams that has previously used for the storage of materials and waste products associated with the former Wool Scouring business.

The existing buildings and surrounding hardstand areas comprise approximately 18360m² at the front of the site with the remaining area of vacant land to the north and east of the existing developed areas. To the north of the development site is the Goulburn Abattoirs.

**Site Operating Hours**

|  |  |
| --- | --- |
| **Composting Activities** |  |
| Monday - Friday | 6.00am to 4.30pm |
| Saturday | 6:00am to 12:00pm |
| Sundays and Public Holidays | None |
| **Construction Activities** |  |
| Monday - Friday | 7.00am to 6.00pm |
| Saturday | 7.00am to 1.00pm |
| Sundays and Public Holidays | None |

# Definition of a Pollution Incident

*A* ***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.

# Notification of a Pollution Incident

A pollution incident is required to be notified if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

1. harm to the environment is material if:
2. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
3. it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and
4. 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.

PineGro Goulburn is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, Work Cover NSW and the local council. ***‘Immediately’*** has its ordinary dictionary meaning of promptly and without delay.

# Scope

This PIRMP must be followed by employees, contractors and visitors to PineGro Goulburn in order to assist in the early response and reporting of a pollution incident.

# Pollution Response Team Responsibilities

The Site Manager is responsible for accessing the overall severity of the incident and controlling of any pollution incident until the incident is under control and an initial investigation has been completed.

The Team’s responsibilities include:

* Activating the initial incident response to ensure effective control of the situation.
* Activating the site emergency evacuation procedures to ensure the health and safety of all workers.
* Prevent unauthorised access to the incident area.
* Notifying emergency services and appropriate regulatory authorities of the incident
* Notify direct neighbours / members of the community about the incident.
* Respond to issues as they arise during the incident.
* Obtaining and collating information from internal and external sources.
* Ensuring that appropriate personnel are kept informed of the incident.
* Managing internal and external communications

# Pollution Incident Response Team Roles

|  |  |
| --- | --- |
| **Roles**  **Contact PineGro Head Office (03 5367 3222) for connection with any roles listed below** | **Responsibilities** |
| INCIDENT CONTROLLERS  Site Manager and authorized employees | * Assess the incident situation and activate the site Emergency Response Team if required * Activate the site emergency evacuation procedure. * Manage the site evacuation procedure. * Liaise with emergency services and regulatory authorities upon arrival. * Notify appropriate regulatory authorities of the pollution incident. |
| * Assess the incident scene and manage the clean-up and control process. * During emergency evacuation prevent unauthorised access to the site * Upon request contact emergency services. |
| COMMUNITY LIASON  General Manager & Site Manager | * Notify direct neighbours and members of the community about the incident. |
| INCIDENT NOTIFYER  General Manager | * Assist with Notification of appropriate regulatory authorities of the pollution incident. * Obtain and collate information from internal and external services. * Maintain documentation of evidence provided to authorities. |
| INTERNAL COMMUNICATIONS MANAGER  HSEQ Officer | * Manage internal communications within PineGro |

# Pollution Response Key Contacts

Any pollution incident satisfying the material harm threshold must be immediately reported to relevant statutory authorities by either the General Manager or HSEQ Officer.

In cases where material harm level cannot be immediately assessed, or insufficient information is available on the severity of the incident, the general advice is to notify the Relevant Authorities and discuss that the situation could not be fully assessed. The incident notification should be limited to facts known and records of the notification must be documented. The following facts should be provided at the time of notification: Location & time, Type of incident (e.g., fire, spill, escape, explosion) and Initial response taken.

# Regulatory Contacts

|  |  |  |
| --- | --- | --- |
| **Type** | **Contact Details** | **Role Required to Contact** |
| Emergency Services (NSW Fire & Rescue) | 000 | General Manager / HSEQ Officer |
| Department of Environment & Heritage (NSW EPA) | 02 9695 2777,  Environment Line: 131 555 |
| Ministry of Health (Pollution Incident) | 02 9391 9000 |
| Work safe NSW | 13 10 50 |
| Poisons Information | 13 11 26 |
| Sydney Catchment Authority | 1300 722 468 |

# External Services Contacts

|  |  |  |
| --- | --- | --- |
| **Type** | **Contact Details** | **Role responsible for identifying local authority and nearest public health units.** |
| Electricity Supplier – Origen Energy | 1300 137 427 | General Manager / Site Manager |
| Gas Supplier – | No gas on this site | General Manager / Site Manager |
| Water Supplier – Goulburn Mulwaree Council | 02 4823 4444  02 4823 4500 AH Emergencies | General Manager / Site Manager |
| Goulburn Medical Clinic | 02 4823 0200 | General Manager / Site Manager |

# Neighbour Contacts

|  |  |  |  |
| --- | --- | --- | --- |
| **Type** | **Location** | **Contact Details** | **Role Required to Contact** |
| Southern Meats | Mazamet Road Goulburn | Ph: 02 4824 0000 | COMMUNITY LIASON |
|  |  |  |  |
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# Potential Pollution Incidents Risk Assessment

| **Incident Type** | **Hazards** | **Incident Response** | **Site Controls / pre-emptive actions** | **Likelihood** |
| --- | --- | --- | --- | --- |
| Pollution from fire | * Smoke to air and danger to surrounding areas * Dangerous goods spill * Ignition source in hazardous area * Equipment electrical failure * Dust explosion | Minor Scenario response (smolder/spot fire)   * 1. Control Fire/ smolder. * 2. Notify Site Management * 3. Report through normal incident channels   Major Scenario response (Factory Fire/Explosion)   * Activate the nearest emergency alarm * Contact Site Manager to notify emergency services * Community Communications Manager to inform neighbour of incident. * Attack fire if safe to do so * Shut down equipment * Evacuate to safe assembly area * Remain in assembly area until the all clear is given by emergency services and Chief Fire Warden. * Clean the area and remove damaged equipment. * Site Manager hold a debrief session to document site response and determine improvement initiatives. | * Extinguishers * Hose Reels * Sprinkler System (Re commission and test frequency) * Alarm System * Fire Team * First Attack Training * Remove all EPS panels from site | MEDIUM |
| Diesel spill (2000 L Maximum) | * Contamination of waterways * Forklift contact with tank * Dropping IBC Container * Tank Damage * Leak | Minor Scenario response (Contained Spill)   * Attack the spill to prevent spreading, entering storm water drains/waterways. * Notify Site Management * Barricade spill area to prevent access * Use absorbent material to clean the spill such as saw dust. * Dispose of spill cleanup material appropriately, dampen absorbent material to mitigate self-combustion. * Report through normal incident channels   Major Scenario response (Contamination of ground/waterways)   * Attack the spill to prevent further spreading or entering storm water drains/waterways. * Notify the Site Manager of any loss of containment * Use absorbent material to clean the spill * Barricade spill area to prevent access * Dispose of spill cleanup material appropriately, dampen sorbent material to mitigate self-combustion. * Ensure spill is contained on site. * Inform regulatory authority if spill not contained to site, see section Response Team Roles. * Hold a debrief session to document site response and determine improvement initiatives. | * Trained and competent forklift drivers with loads secured to tynes * Storm water drain shut off valves is located at front of building * Bunded areas used * Spill kits must be available * Spill’s response training * Manifest listing DG’s stored on site * Relocate diesel tank from container to bunded area. | LOW |
| Distribution | * Truck collision causing spill * Forklift loading / unloading truck causing spill | * Contact freight company * Activate emergency response clean up * Barricade spill | * Chain of Responsibility Audits * Load Restraint | MEDIUM |
| Colour Machine releasing oxides into storm water | * Contamination of waterways or land * Heavy Rainfall and pump failure. | Minor Scenario response (Oxide’s overflow contained onsite)   * Notify Site Management. * Report through normal incident channels.   Major Scenario response (Overflow not contained onsite)   * Notify Site Management. * Shut down Colour Machine. * Stop storm water release from site to outside environment. * Incident Notifier to inform/Liaise with regulatory authority as required * Site Manager, hold a debrief session to document site response and determine improvement initiatives. | * Relocate Colour Machine fixed plant from zone 2 to zone 8. | MEDIUM + |
| Release of Odour | * Contamination to air * Failure of Odour control system | Minor Scenario response (Single Odour Complaint)   * Inform Site Manager of any complaint * Raise as a community complaint * Site Manager to Incident Notifier to inform regulatory authority as required   Major Scenario response (Multiple Odour Complaints)   * Inform Site Manager of any complaint * Site shutdown pending investigation of cause. * Raise as a community complaint * Incident Notifier to inform/Liaise with regulatory authority as required * Site Manager hold a debrief session to document site response and determine improvement initiatives. | * Odour control system * Consider Biofilters | MEDIUM |
| Release of Dust | * Contamination to air * Dust Collector failure | Minor Scenario response (Overflow contained onsite)   * Control / Clean up dust release. * Notify Site Management. * Report through normal incident channels.   Major Scenario response (Overflow not contained onsite)   * Activate the nearest emergency alarm. * Contact Site Manager to notify Incident Notifier to report to emergency services * Community Communications Manager to inform neighbours of incident. * Shut down equipment * Evacuate to safe assembly area * Remain in assembly area until the all clear is given by emergency services and Chief Fire Warden. * Incident Notifier to inform/Liaise with regulatory authority as required. * Hold a debrief session to document site response and determine improvement initiatives. | * Dust collectors with fail safe shutdown and maintenance | LOW |

**\***When Emergency Evacuation is required, for training purposes please review OH&S section 4.2.0.

# Goulburn Site Map

**6**

**9**

**8**

**7**

**5**

**4**

**3**

**1**

**2**

Site Map Legend

|  |  |
| --- | --- |
| **Zone** | **Description** |
| **1** | Packaged products |
| **2** | Diesel storage |
| **3** | Automated packaging line |
| **4** | Compost material |
| **5** | Traffic direction |
| **6** | Fertiliser storage |
| **7** | Sawdust |
| **8** | Bark storage and processing |
| **9** | Compost blending area |

# Team Training

The pollution response team (all employees) has been trained in the pollution incident response plan and is made aware of any updates to the plan. The plan will be reviewed as part of the Site Emergency Procedure Review.

The Emergency Team has been trained in spill response procedures and are aware of the hazards on site. As part of the Emergency Response Plan, annual evacuation tests are conducted.

# Plan Testing

The plan will be tested as part of the Site Emergency Response Procedure. Specific scenarios may be developed to conduct a trial emergency response.

The plan will be reviewed every year as part of the Site Emergency Response Procedure Review.

# Reference Documents

Emergency Management Plan, OH&S Manual 4.2.0

NSW Environment Protection Authority, Environmental guidelines: Preparation of pollution incident response management plans 2019.

# Legislation

Protection of the Environment Operations Act 1997, section 153A

Protection of the Environment Operations (General) Regulation 2009

# Hazardous and Dangerous Goods Manifest

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Location** | **Proper Shipping Name** | **Class / Division** | **Type** | **Design Capacity** | **Max Store** | **Typical Quantity** |
| Inside container | Diesel | C1 | Tank | Above ground storage | 2,000L | 1,800L |
| Shed 2 | COPPER SULPHATE | 2Z | Powder | Bag | 3000kg | 2000KG |
| Shed 2 | MAGNESIUM SULPHATE | C9 | Powder | Bag | 5000KG | 3000KG |
| Shed 2 | WETTING AGENT | C9 | Powder | Bag | 2000LTR | 2000KG |

# Document Storage

|  |  |
| --- | --- |
| **Copy Type** | **Location** |
| Hard copy | PineGro Goulburn Administration Office |
| Electronic | Public Access Online on PineGro’s Website  PineGro Head Office |

| **TRAINING ATTENDANCE RECORD** | | | |
| --- | --- | --- | --- |
| **Print Name:** | **Signature:** | **Print Name:** | **Signature:** |
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