

# **Pollution Incident Response Management Plan**

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27 Foundation Rd, Truganina 3029

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Schedule 1 – Allied Mills Emergency Management Procedures

Map 1– Location of Premises

Maps – Location of Potential Pollutants on Premises

Map 8 – Location of Any Stormwater Drains and Discharge Locations of Any Stormwater Drains to the Nearest Watercourse or Water Body

# Pollution Incident Response Management Plan

## 1. Pollution Incident Response Management Plan

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- 1.1 The document is a Pollution Incident Response Management Plan (**PIRMP**) for Allied Mills Truganina Site, prepared in accordance with the Environmental Protection Act 1970
- 1.2 The PIRMP identifies the procedures that must be implemented in the event of a pollution incident that results in actual or threatened material harm to the environment.
- 1.3 A copy of this PIRMP must be kept at the site at all times, and must be made available to and must be made available to an authorised officer of EPA Victoria on request and to any person who makes a written request for a copy.
- 1.4 This Pollution Incident Response Management Plan must be tested on an annual basis to ensure that the information included in the Pollution Incident Response Management Plan is up to date and the Pollution Incident Response Management Plan is capable of being implemented in a workable and effective manner.
- 1.5 This Pollution Incident Response Management Plan must be tested within one month of any pollution incident occurring so as to assess, in the light of that incident, whether the information included in the Pollution Incident Response Management Plan is accurate and up to date and the Pollution Incident Response Management Plan is still capable of being implemented in a workable and effective manner.

## 2. What is “the Environment”?

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- 2.1 The **environment** means components of the earth, including:

- (a) Land, air and water; and
- (b) Any layer of the atmosphere; and
- (c) Any organic or inorganic matter and any living organism; and
- (d) Human-made or modified structures and areas;

and includes interacting natural ecosystems that include components referred to in paragraphs (a)-(c).

- 2.2 Harm to the environment** includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.
- 2.3** It is important to remember that the “environment” is very broadly defined and an incident that only results in harm to a person or manmade structures could nevertheless be an environmental incident (as well as a safety incident).

### **3. Pollution Incidents and the Requirement to Report**

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**3.1 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.*

**3.2 Duty to report**

Any pollution incident causing or threatening material harm must be **immediately** reported to all relevant authorities.

**3.3 The relevant authority** means any of the following:

- (a) The appropriate regulatory authority;
- (b) If the EPA is not the appropriate regulatory authority – the EPA;
- (c) If the EPA is not the appropriate regulatory authority – the local authority for the area in which the pollution incident occurs;
- (d) The Dept of Health VIC;
- (e) The VIC WorkSafe Authority; and
- (f) Fire and Rescue VIC.

For contact details for the relevant authorities for this site, see section 9 of the PIRMP.

**3.4 The relevant information** about a pollution incident required to be given to the relevant authority 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); and
- (e) The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known;

If any of the relevant information is not known when the initial notification is made to the relevant authority, but becomes known afterwards, that information must be notified immediately after it becomes known.

- 3.5** Because a pollution incident must be reported immediately to the relevant authorities, it is important that all staff are trained in the identification, reporting and management of pollution incidents.

If a staff member becomes aware of anything that could potentially be a pollution incident, that staff member must immediately report that potential incident in accordance with section 4 of this PIRMP.

- 3.6** A pollution incident involving only the emission of an odour is not required to be reported.

- 3.7** 'Immediately' has its ordinary dictionary meaning of promptly and without delay.

#### **4. Assessing whether an incident must be reported, and how to report**

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- 4.1** As soon as a person becomes aware of a pollution incident, it must be immediately reported if it causes or threatens material harm to the environment, as explained above.

- 4.2** Employees must report the incident to the relevant managerial staff in accordance with the Reporting Chain of Command Chart.

- 4.3** In considering whether or not an incident must be reported, a person must consider:

- (a) The likely impacts from the incident – eg:
- (i) Are they trivial only, with no real risk of becoming anything more than trivial and not expected to result in \$10,000 of property damage or clean up costs? Eg. a spill of 1 tonne of flour in the premises car park, which can be cleaned up quickly and cheaply.
  - (ii) Are they trivial at the moment, but with the potential to become more than trivial? Eg. a spill of 20 tonnes of flour onto a dry riverbed that could take a day for site staff to clean up, when wet weather is imminently expected which could cause the river to fill and to carry the flour downstream.
  - (iii) Has any property damage been caused by the incident? What is the likely cost of the damage, combined with anticipated clean up cost – is it expected to be \$10,000 or more?
  - (iv) How should the incident be cleaned up and what are the likely costs of the clean up (are they likely to be \$10,000 or more?).

- 4.4 Where employees are unsure about whether or not an incident involves material harm to the environment, they must immediately report it to the relevant Site Supervisor/Manager so that this issue can be promptly considered and determined by the relevant Site Supervisor/ Manager.
- 4.5 Contractors and site staff are not required to form a view about whether any environmental incident is a reportable pollution incident, and should notify management of **all** environmental incidents so that this issue can be considered at a higher level.
- 4.6 The Site Manager will have authority to report all incidents on behalf of Allied Mills, after attempting to first discuss with their relevant General Manager & National WHS Manager if they can be promptly contacted.
- 4.7 If anyone in the above chain of command cannot be promptly reached, contact should be made with the next level of command.
- 4.8 In the event of uncertainty as to whether or not the incident is causing or threatening material harm to the environment, contact should be made with the next level of command and the issue should be considered at this level. If the uncertainty cannot be resolved, the incident should be treated as a reportable incident.
- 4.9 In the unlikely event that no one within management is able to be contacted with reasonable promptness, the site manager must report any incident causing or threatening material harm to the environment to the relevant authorities themselves.

## 5. Hazard Identification, Risk Analysis and Pre-Emptive Actions

### 5.1 Hazards

Hazard	Impact	Risk	Circumstances/events that increase or decrease likelihood of risk	Pre-emptive management measures
<b>LPG leak</b>	Minor short term harm to the environment.	Medium, B2	Leak would occur in outloading area which is in the open air.	<p><b>Pre-emptive measures</b> Regular inspections to be completed by external provider as per contract agreement.</p> <p>Daily in house inspections to be completed by site workers.</p> <p>Complete any recommendations if required.</p> <p>Train all relevant personnel on how to turn off cylinder valve.</p> <p><b>Responsive measures</b> If any leakage is detected or suspected from a cylinder, turn it off immediately by turning off the cylinder valve.</p> <p>Complete any repairs required if necessary.</p>
<b>Hydraulic Fuel spill</b>	Minor short term harm to the environment.	Medium, B2	Spill occurs near a watercourse, providing exposure pathway for offsite impacts.	<p><b>Pre-emptive measures:</b> Provision of spill containment.</p> <p>Train all relevant personnel in the use of spill kits.</p> <p><b>Responsive measures:</b> Use of spill containment kits.</p> <p>If possible, bund any drainage of spilled material to prevent from entering sewers, and work pits, or any place where its accumulation can be dangerous</p>
<b>Spill Entering Stormwater</b>	Moderate Medium Term Harm to the environment	High C3	Spill occurs near a watercourse, providing exposure pathway for offsite impacts.	<p><b>Pre-emptive measures</b> All storm water drains to be marked with blue paint to clearly identify and raise awareness of stormwater infrastructure from other water drainage infrastructure at the site.</p> <p>Signage to be displayed to remind workers and contractors to not wash down vehicles, equipment or pavement.</p> <p>Installation of Storm guards in all areas where stormwater collection occurs. Regular monthly inspections of</p>

				<p>all stormwater sump pits to ensure there is no build up of product, residue, etc.</p> <p>Provision and use of spill containment kits.</p> <p>Train all relevant personnel in the use of spill containment kits and site management practices.</p> <p><b>Responsive measures:</b> Use of spill containment kits.</p> <p>If possible, bund any drainage of spilled material to prevent from entering sewers, and work pits, or any place where its accumulation can be of concern.</p> <p>Incident must be immediately reported to site supervisor or manager.</p> <p>Relevant authorities to be notified immediately.</p> <p>An incident report must be completed within 24 hours.</p>
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## Risk Analysis

### 6.1 Risk Ranking Matrix

Likelihood (L)		
A	Almost Certain	Expected to be the most likely outcome, 90-100% probable.
B	Likely	Will probably occur in most circumstances, 51-90% probable
C	Possible	Might occur at some time, 30-50% probable.
D	Unlikely	Could occur, but would not be expected, 10-29% probable.
E	Rare	No known occurrence in similar circumstances, less than 10% probable.

Consequence (C) – Impact		
1	Insignificant	First aid injury/illness, negligible harm to the environment.
2	Minor	Medically treated injury/illness, minor short term harm to the environment.
3	Moderate	Lost time injury/illness, moderate medium term harm to the environment.
4	Major	Single fatality, serious irreversible injury/disease. Permanent localised harm or serious medial term harm to the environment.
5	Catastrophic	Multiple fatalities. Permanent and extensive harm to the environment.

Risk Ranking (R)					
	(C)				
(L)	1	2	3	4	5
A	M	M	H	E	E
B	M	M	H	H	E
C	L	M	H	H	H
D	L	M	M	H	H
E	L	L	L	M	H

### Reporting Requirements

Risk	Incident Characteristics	Action
<b>Low</b>	<p>Potential for, but no actual harm.            General environmental hazards (such as hazardous substances not stored in secure locations).            Handling mishaps with fuels, oil, lubricants and/or hazardous substances not resulting in spillage.            Loss of control of equipment not resulting in damage to vegetation or property.            Inefficient or lacking traffic and access controls that almost resulted in an incident.</p>	<p>Site staff must report incident to the Site Supervisor/Manager immediately, and an incident notification record must be produced within 24 hours of incident.            If the incident involved potential non-trivial environmental harm, it must be <b>immediately</b> reported to relevant authorities.            Incident notification record must advise suitable controls to be implemented in future situations to prevent recurrence.</p>
<b>Medium</b>	<p>A minor environmental incident has occurred when material has been spilled or released to the environment (land, air, water, people affected), causing no significant pollution or harm to the environment.            Its consequence/impact are measured as moderate and include some or all of the following aspects:</p> <ul style="list-style-type: none"> <li>• Material easily contained and recovered;</li> <li>• Is confined to work site boundaries;</li> <li>• Involves minimal or minor interruption to work activities;</li> <li>• Complaints easily handed at the worksite;</li> </ul>	<p>Site staff must report incident to the Site Supervisor/Manager immediately, and an incident notification record must be produced within 24 hours of the incident.            The incident must be <b>immediately</b> reported to relevant authorities.            Incident notification record must advise suitable controls to be implemented in future situations to prevent recurrence.</p>
<b>High</b>	<p>Material spilt or released to the environment where its consequences/impacts are measured at some or all of the following aspects:</p> <ul style="list-style-type: none"> <li>• Actual or potential breach of environmental legislation or licence;</li> <li>• Moderate to serious actual or potential environmental harm.</li> </ul>	<p>Site staff must report incident to the Site Manager. Site manager will notify General Manager &amp; National WHS Manager immediately, and an incident notification record must be produced immediately after the incident.            The incident must be <b>immediately</b> reported to relevant authorities.            Incident notification record must advise suitable controls to be implemented in future situations to prevent recurrence.</p>
<b>Extreme</b>	<p>National press coverage.            Regulatory investigation and significant penalties/fines incurred and potential or actual loss of licence.            Major community impacts.            Major and long term consequence on the environment. Extensive clean-up required with external assistance.</p>	<p>Site staff must report incident to the Site Manager. Site Manager will notify General Manager &amp; National WHS Manager immediately, and an incident notification record must be produced immediately after the incident.            Allied Mills Executive Management must notify relevant authorities <b>immediately</b>.            Allied Mills shall provide a full incident investigation report to the relevant authorities as soon as practicable after the incident has occurred. Work on site to cease during external incident investigation.</p>

## 7. Inventory of Pollutants

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Bagged Flour products	Approx. 4,000 tonnes.
LP Gas	600 litres and 5 cylinders
Hydraulic oil	Not stored on site but in Trucks which load and unload on site

## 8. Safety Equipment

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The following safety equipment or devices that are used to minimise the risks to human or health or the environment and to contain or control a pollution incident are as follows

### **Flour**

Product is stored in bags.

### **Noise**

Noise is minimised through the engineering controls on forklifts and trucks.

### **Spill Kits**

Spill kits are located in the following area:

- Outside Office Door to Warehouse
- In the Outloading area

Only trained persons in spill control procedures will engage in spill response.

Spill Response Kits shall be inspected every three months.

### **Personal Protective Equipment**

- All required PPE is made available for use

### **Safety Data Sheets**

Safety Data Sheets (SDS) detailing action to be taken to safely control spills of hazardous materials and dangerous goods are available where hazardous chemicals are used

### **Extinguishers and Hose Reels**

Fire extinguishers and hose reels are provided for first attack fire fighting, when safe, by workers trained in their use.

Extinguishers, hoses, and hydrants will be tested at least six monthly in accordance with the relevant Australian Standard (e.g. AS1851 for extinguishers).

## 9. Contact Details – Relevant Authority

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- 9.1** If the pollution incident presents an immediate threat to human health or property, call Triple Zero (000).
- 9.2** If the incident does not require an initial combat agency, or once Triple Zero has been contacted, notify the relevant authorities in the following order:

Relevant Authority	Contact Details
Environmental Protection Authority - VIC	Environmental Phone Line – 1300 372 842
Local Council - Wyndham	(03) 9742 0777
Ministry of Health	1300 253 942
Worksafe VIC	1800 136 089
Fire and Rescue VIC	(03) 9662 4733

## 10. Contact Details – Allied Mills

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- 10.1** The following individuals must be contacted immediately in the event of a pollution incident and are responsible for activating the PIRMP and managing the response.

Name	Position	24-Hour Contact Details
<b>Chris Woodhouse</b> ( <i>responsible for managing the response to a pollution incident &amp; authorised to notify relevant authorities</i> )	<i>Site Manager</i>	0401 700 976
<b>Frank Paola</b>	<i>National Logistics Manager</i>	0401 700 933
<b>Maria Hooker</b>	<i>National WHS &amp; E Manager</i>	0401 700 860
<b>Karthi Karthigeyan</b>	<i>General Manager Supply Chain</i>	0401700 873
<b>Stephanie Vass</b>	<i>General Manager Corporate Services/Company Secretary</i>	0401 700 929
<b>Joseph Di Leo</b>	<i>Managing Director</i>	02 9352 4901

## 11. Contact with Neighbours and the Local Community

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After raising an alarm and ensuring that the emergency services are notified if required, the Site Manager or Designated Manager, if required, will contact the neighbouring properties of the incident by phone or in person.

The immediate neighbours to the site are:

Note: Refer to Allied Mills Emergency Management Plan policy and Allied Mills Tullamarine Site Emergency procedure on full steps to follow as per different types of incidents.

Advise neighbours to standby for further instructions by VIC Police or Fire Brigade Officers if required.

Also advise neighbours to close windows and doors and remain inside for incidents involving the emission of air pollutants and/or chemical spills/leaks.

## 12. Minimising Harm to Persons of the Premises

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### **Emergency evacuation**

Upon hearing the alarm the following needs to be considered:

- Ascertain the nature of the emergency and determine appropriate action.
- Ensure that the appropriate emergency service and regulatory bodies have been notified if required.
- Advise staff of the situation.
- Meet emergency services at evacuation area:  
The front of 27 Foundation Road Truganina

### **Emergency Equipment**

Equipment has been installed around the site for use in response to emergencies. It shall be maintained and accessible for immediate use, and its location appropriately sign posted. The range of equipment installed at the Site is detailed in the site emergency plans displayed throughout the site.

### **Alarm**

The on-site alarm system can be triggered manually by pressing switches located around the site and also automatically by smoke and loss of water pressure in hydrants/sprinklers. The alarm is audible throughout the site.

### **Emergency Exits**

Backlit emergency exit signs are installed within all parts of the building. These “lights” are designed with an internal battery supply and operate independently of the main power system in an emergency situation.

### **Minor Chemical Spills**

- Minor spills should be dealt with immediately as detailed in the Safety Data Sheets AND Section 5.1.
- If a spill has occurred due to a plant problem or failure the Supervisor(s) or Operator(s) are to be advised so the problem can be contained & remedied.

### **Major Chemical Spills**

In the event of a major chemical spill the following procedure is to be adopted:

- Notify all personnel in the area that a spill has occurred. Where danger exists from spread of spill, the area should be evacuated immediately.
- One person to be detailed (if safe to do so) to notify the Supervisor(s) or Operator(s) who will immediately assess the need for outside assistance.
- Personnel dealing with chemical spills must wear the designated protective clothing, breathing apparatus etc. & have knowledge in using spill kits
- Initial action in controlling the spill should be directed towards closing off the source of the spill.
- Secondary action should be directed towards preventing the spread of the spill to other parts of the plant or outside the plant boundaries or into council drains.
- Once the spill is contained the material should be neutralised and then disposed of as detailed in the Safety Data Sheet.

Also refer to further information stated in Sec 5 of this document.

### 13. Staff Training

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General training in emergency preparedness shall be provided to all site workers on the following as a minimum:

- Definition and Types of emergency
- Emergency facilities, their function, location and how to use them
- Means of communication and the location of communication facilities
- Actions in case of emergency
- Evacuation procedures

Specific training shall be provided to the appropriate staff on:

- First aid (training company)
- Use of site supplied fire fighting equipment (training company)
- Use of supplied spill containment and clean up equipment (internal)

The relevant training shall be provided to all new workers at the start of their employment.

Retraining shall be provided annually.

The training of each worker shall be recorded and the records of training shall be retained in Allied Mills Training Database,

### 14. Testing of Pollution Incident Response Management Plan

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#### Mock Evacuation

Evacuation drills shall be carried out annually.

Whenever a scheduled mock evacuation occurs, the Chief Warden or designated person must notify the relevant authorities in Sec 9 to ensure they do not attend the site.

Following an evacuation a review will occur. The following should be evaluated:

- Appropriateness of alarm
- If the alarm was heard by everyone
- Time took for completing roll calls
- Detail manner in which plan is to be tested and maintained.
- How was the communication process
- If fire doors were closed
- If gates were opened
- If everyone was accounted at evacuation point
- If personnel protection equipment was used
- Role of fire wardens
- Time took for completing the drill

A corrective action may be raised following mock evacuation if there were any issues.

The issues will be tracked and addressed through the incident investigation system.

The PIRMP shall be evaluated by simulated emergencies.

The review shall be reported in Allied Mills Incident Reporting Database..



