	Taren Point WHSE-001 Taren Point Pollution Incident Response Management Plan	Version No:	V06
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1. Purpose

The Pollution Incident Response Management Plan (**PIRMP**) for the Taren Point site has been prepared in accordance with NSW Protection of the Environment Legislation Amendment Act 2014.

The objectives of the PIRMP are to:

- ensure comprehensive and timely communication about a pollution incident to staff at the site, the Environment Protection Authority (EPA), other relevant authorities and people outside the site who may be affected by the impacts of the pollution incident
- minimise and control the risk of a pollution incident at the site by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the PIRMP is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the PIRMP is regularly tested for accuracy, currency and suitability.

A copy of this PIRMP must always be kept at the site and must be made available to an authorised officer of the EPA NSW on request and to any person who makes a written request for a copy.

2. Site Implementation

A copy of this PIRMP must always be kept at the site and must be made available to an authorised officer of the EPA NSW on request and to any person who makes a written request for a copy.

Site Management must follow the pre-emptive and responsive measures as per Section 4.12 of this procedure.

Testing of the PIRMP must be carried out annually.

Retraining must be provided annually, and the training of each worker shall be recorded, and the records of training shall be retained in Allied Pinnacle Training Database.

3.0 Responsibilities

Site Management shall ensure:

- As soon as a person becomes aware of a pollution incident, it must be immediately reported to a Site Supervisor/Manager whether it causes or threatens material harm to the environment so that the issue can be promptly considered and determined by the relevant Site Manager.
- The Site Manager must report all incidents to their relevant Senior Allied Pinnacle Manager & State and National WHS Manager if they can be promptly contacted. Refer to Section 4.8

If anyone at a particular level of authority cannot be promptly reached, contact should be made with the next level of authority.


All workers must report any environmental issues identified and to ensure the prevention of any environmental issues.

4.0 Method

4.1 What is “the Environment”?

The environment means components of the earth, including:

- **Land, air, and water**
- **Any layer of the atmosphere**
- **Any organic or inorganic matter and any living organism**
- **Human-made or modified structures and areas**

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4.2 Harm to the environment

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.

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.

Harm to the environment is material if:

- a) It involves actual or potential harm to the health or safety of human beings, or to an ecosystem that is not trivial; or
- b) It results in actual or potential loss or property damage, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by state regulations)

This is a very low threshold:

1. No actual harm is required, only threatened harm
2. The harm does not need to be significant, but only non-trivial
3. The \$10,000 measure (which includes any clean-up costs) is a separate and independent test for materiality and an incident may be reportable under (a) even if it does not meet (b).

4.3 Pollution incidents and the requirements to report

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 site.

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

4.4 Relevant Authorities


The relevant authority (Refer to Section 4.7) means any of the following:

- a) The appropriate state regulatory authority
- b) If the NSW EPA is not the appropriate regulatory authority – the EPA
- c) If the NSW EPA is not the appropriate regulatory authority – the local authority for the area in which the pollution incident occurs
- d) NSW Ministry of Health
- e) Safework NSW
- f) NSW Fire and Rescue
- g) Local Council

4.5 Relevant information

The relevant information about a pollution incident required must be provided to the relevant authority consisting of the following:

- The time, date, nature, duration, and location of the incident
- The location of the place where pollution is occurring or is likely to occur

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- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- The circumstances in which the incident occurred (including the cause of the incident, if known) and
- 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.

4.6 Assessing whether an incident must be reported, and how to report

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.

In considering whether or not an incident must be reported, a person must consider the likely impacts from the incident for example:


- 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 cleanup costs? E.g. a spill of 1 tonne of flour in the premises car park, which can be cleaned up quickly and cheaply.
- Are they trivial at the moment, but with the potential to become more than trivial? E.g. 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 expected imminently, which could cause the river to fill and to carry the flour downstream.
- Has any property damage been caused by the incident? What is the likely cost of the damage, combined with anticipated cleanup cost – is it expected to be \$10,000 or more?
- How should the incident be cleaned up and what are the likely costs of the cleanup (are they likely to be \$10,000 or more?). Refer to NSW Protection of the Environment Legislation Amendment Act 2014.
- It involves actual or potential harm to the health or safety of human beings. Refer to WHSE-Form-25A Provision Notice NSW for information in regard to Notifiable Serious Incidents.

Where workers are unsure about whether or not an incident involves material harm to the environment, they must immediately report it to the relevant Site management so that this issue can be promptly considered and determined by the relevant Site management.

Contractors and site workers are not required to form a view about whether any environmental incident is a reportable pollution incident and should notify site management of all environmental incidents so that this issue can be considered at a higher level.

The Site Manager will have authority to report all incidents on behalf of Allied Pinnacle, after attempting to first discuss with their relevant General Manager, State and National WHS Manager if they can be promptly contacted. (Refer to Sec 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 General Manager and the issue should be considered at this level.

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If the uncertainty cannot be resolved, the incident must be treated as a Serious reportable incident.

In the unlikely event that no one within senior management can be contacted with reasonable promptness, the Site management must report any incident causing or threatening material harm to the environment to the relevant authorities themselves.

4.7 Contact Details – Relevant Authority

If the pollution incident presents an immediate threat to human health or property, call Triple Zero (000).

Notify the relevant authorities as required :

Relevant Authority	Contact Details
Environmental Protection Authority	Environmental Phone Line – 131 555
Sutherland Shire Council	(02) 9710 0333
Ministry of Health	General – 1300 066 055 Sydney Office – 02 9382 8333
Safework NSW	13 10 50
Fire and Rescue NSW	1300 729 579
Cleanaway (<i>to be used for major spill clean-up</i>)	8558 5184 Michelle.ring@cleanaway.com.au


4.8. Contact Details - Site

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	Contact Details
Michelle Iervasi	Warehouse Manager	0419 896 570
Ivan Katic	Maintenance Manager	0408 613 917
Darren Hall	Site Manager	0419 392 424
Dominika Paldyna	NSW WHSE Coordinator	0413 053 957
Maria Hooker	National WHSE Manager	0401 700 860
Ivan Brown	Head Of Bakery Operations	0438 577 515
David Pitt	Chief Executive Officer	0419 756 775

4.9 Contact with Neighbours and the Local Community

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

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4.9.1 The immediate neighbours to the site are:

1/5-7 Production Road Taren Point (left of driveway) CJ's Dent Removal C&E Critharis' Construction Pty Ltd	0414 253 368 / 95266324 95312312
5/5-7 Production Road Taren Point (left of driveway) C&E Critharis' Construction Pty Ltd	95312312
2 Alexander Ave Taren Point (second driveway left side near canal) Anglican Retirement Villages	(02) 9421 5333
1 – 6/2 Unit 2 Production Road Taren Point (South neighbouring units) A & D refrigeration and A/C	(02) 9525 4466
1 – 6/2 Unit 4 Production Road Taren Point (South neighbouring units) MP Consulting Asia Pacific	Not available
1 – 6/2 Unit 6-7 Production Road Taren Point (South neighbouring units) Southern Fresh Australia (food processing)	(02) 9540 9997

Note: Refer to WHS-019 Emergency Management and Taren Point WHSE-002 Taren Point Emergency Management Plan on full steps to follow as per different types of incidents.

Advise neighbours to standby for further instructions by NSW 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 or chemical leaks.

4.10 Safety Equipment

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.

4.10.3 Spill Kits

Spill Containment kits are in the areas as identified on the Site map which is part of the procedure.

Note: Only trained persons in spill control procedures will engage in spill containment.

4.10.4 Personal Protective Equipment

PPE is provided in spill kits and any other PPE will be provided as per the requirements of the Safety Data Sheets.


4.10.5 Safety Data Sheets

Safety Data Sheets (SDS) detailing safe work practices to safely control spills of hazardous materials and dangerous goods are available on site in locations where chemicals are used and stored.

4.10.6 Extinguishers and Hose Reels

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

Extinguishers, hoses, and hydrants must be tested in accordance with the relevant Australian Standard (e.g. AS1851 for extinguishers).

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4.12 Hazard Identification, Risk Analysis and Management measures

Risks are calculated using the Potential Severity Matrix in Policy WHSE-008 Hazard ID, risk assessment and control measures.

Hazard	Impact	Risk	Circumstances/evnts that increase or decrease likelihood of risk	Management measures
Liquid, mechanical, edible, hydraulic oil, Hazardous Chemicals and Ingredients spill	Moderate Medium Term Harm to the environment	Unlikely to occur, Serious Cat 3 (9)	Spill occurs near a watercourse, providing exposure pathway for offsite impacts.	<p><u>Pre-emptive measures:</u></p> <ul style="list-style-type: none"> 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 Ensure correct storage of Liquid, mechanical, edible, hydraulic oil, Hazardous Chemicals and Ingredients Ensure Safety Data Sheets available Ensure provision of spill containment kits Train all relevant personnel in the use of spill containment kits, Safety data sheets and site management practices <p><u>Responsive measures</u></p> <ul style="list-style-type: none"> Stop the flow of the product with use of Spill kits Site staff must report incident to the Site Management immediately, and an incident notification record must be produced within 24 hours of the incident The incident must be immediately reported to relevant authorities as required Incident investigation must advise suitable controls to be implemented and to prevent reoccurrence
Gas Ovens emissions to air	Minor Short term harm to the environment	Unlikely to occur Minor Cat 4 (4)	Well ventilated and maintenance on oven exhaust systems.	<p><u>Pre-emptive measures</u></p> <p>Air monitoring to be carried when required and maintain oven exhaust systems as per preventative maintenance program.</p> <p><u>Responsive measures:</u></p> <p>Incident must be immediately reported to site management. Relevant authorities to be notified immediately if required.</p> <p>An incident report must be completed within 24 hours. At fault equipment to be repaired.</p>

4.13 Minimising Harm to Persons of the Premises


4.13.1 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 has been notified.
- Advise staff of the situation.
- Meet emergency services at evacuation area: At front of site on Production Road.

4.13.2 Emergency Equipment

Equipment has been installed around the site for use in response to emergencies.

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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 on site and in the site manifest box at the front of the site.

4.13.3 Alarm

The on-site alarm system is a sound horn operated manually. These are located in:

- Muffin Mixing area
- Muffin Palletising area
- Downstairs production office
- Upstairs site managers office

4.13.4 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.

4.13.5 Minor Chemical Spills

Minor spills should be dealt with immediately as detailed in the Safety Data Sheets or as per the spill kit use procedure.

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.

4.13.6 Major Chemical Spills


In the event of a major chemical or ingredient 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 must 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.

4.14 Staff training

A 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

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Specific training shall be provided to the appropriate staff on:

- First aid (training company)
- Fire wardens training
- 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 must be provided, and the training of each worker shall be recorded, and the records of training shall be retained in the Allied Pinnacle Training Database.

4.15 Testing of the PIRMP

Testing of the PIRMP must be carried out annually.

Whenever a scheduled mock evacuation occurs, the Chief Warden or designated person must notify the relevant authorities 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 a plan is to be tested and maintained.
- How was the communication process
- Spill kit availability and use if applicable
- If fire doors were closed if applicable
- If gates were opened if applicable
- If everyone was accounted at evacuation point
- If personnel protection equipment was used if applicable
- Role of fire wardens
- Time took for completing the drill


Any Incident must be reported in Allied Pinnacle's Incident Reporting Database and any corrective actions to be raised following mock evacuation/tests if there were any issues.

Refer to WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work

The PIRMP shall be evaluated by simulated emergencies.


Related Documents

- **WHSE-005 Incident Reporting, Investigation and Injury Management and Return to work**
- **WHS-019 Emergency Management**
- **Taren Point WHSE-002 Taren Point Emergency Management Plan**
- **WHSE-024 Environmental Management Plan including PIRMP**
- **WHSE-008 Hazard ID, Risk assessment and control measures**
- **WHSE-Form-25A Provision Notice NSW**

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DOCUMENT APPROVAL and CHANGE HISTORY

APPROVAL			
Action	Position Title	Name (s)	Date
New Document template-controlled Version 1 to update to new format	National WHSE Manager	Maria Hooker	17.05.2019
Due to recent spill and change to site management a review of the procedure was completed to Version 2 – refer to CAR WHSE – 009	National WHSE Manager	Maria Hooker	06.09.2019
Add Chris Bowyer in contact list information.	NSW WHS Coordinator	Ros Herron	12.06.2020
Add Gerard Segrave to contact list. Remove nitrogen tank information	NSW WHS Coordinator	Ros Herron	22.06.2021
Remove Joe Trevaskis and Gerard Segrave as no longer in the reporting structure	National WHSE Manager	Maria Hooker	22.08.2022
Add new logo and update information and review date to annually	National WHSE Manager	Maria Hooker	20/4/2023

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ALLIED PINNACLE

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Version No:

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