1. Purpose

The Pollution Incident Response Management Plan (**PIRMP**) for Townsville site has been prepared in prepared in accordance with the Environmental Protection Act 1994 and Environmental Protection Regulation 2008.

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 be kept at the site at all times and must be made available to an authorised officer of the EPA Queensland on request and to any person who makes a written request for a copy.

2. Site Implementation

A copy of this PIRMP must be kept at the site at all times and must be made available to an authorised officer of the EPA Queensland 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.

3.0 Responsibilities

Site Management shall ensure:

- As soon as a person becomes aware of a pollution incident, it must be immediately reported it to a Site Supervisor/Manager whether or not it causes or threatens material harm to the environment so that the issue can be promptly considered and determined by the relevant Site Supervisor/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.

If anyone in one 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**

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 means any of the following:
a)   The appropriate state 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)   Each States Ministry of Health
e)   Each States WorkCover/Worksafe Authority
f)   Each States Fire and Rescue
g)   Each Sites Local Council

4.5   Relevant information

The relevant information about a pollution incident required must be provided to the relevant authority consists 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

- 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 clean up 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 imminently expected 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 clean up 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 clean up (are they likely to be $10,000 or more?).

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.

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.

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

In the unlikely event that no one within senior 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.

4.7   Contact Details – Relevant Authority

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

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 QLD	**13 74 68**
Townsville City Council	**13 48 10**
Dept. of Health Queensland	**13 43 25 84**
Workplace Health and Safety QLD	**1300 362 128**
QLD Fire and Rescue	**13 74 68**

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	24-Hour Contact Details
Ian Garlick	Site Manager	0401 701 251
Darren Eales	**National Warehousing Manager – Supply Chain**	**0457 277 714**
Manjiv Fernando	**General Manager Supply Chain**	**0418 592 557**
Cameron Ellem	QLD, SA & WA WHS & E Co-ordinator	0448 699 842
Maria Hooker	National WHSE Manager	0401 700 860
David Pitt	Chief Executive Officer	0419 756 755

4.9   Contact with Neighbours and the Local Community

After raising an alarm and ensure that the emergency services are notified if required, the Site Manager or Designated person, if required, will contact the neighbouring properties of the incident by phone or in person.
The immediate neighbours to the site are:
Total Eden
2/420 Baywater Rd
07 4773 7177

Note: **Refer to WHS-019 Emergency Management procedure** and **Townsville WHSE-002 Emergency Management Plan** on full steps to follow as per different types of incidents

Advice neighbours to standby for further instructions by QLD 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   Inventory of Pollutants
Bagged Flour/bucket& pales ingredients   1500 pallets

4.11   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.

4.11.1 Dust – Grain and Flour
Minimal dust on site which would not cause any air quality concerns.

4.11.2 Noise
Minimal noise from truck and forklift movement.

4.11.3 Spill Kits
Spill Containment kits are located in the following areas:
- Outside Office Door to Warehouse

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

Spill Containment Kits shall be inspected every three months.

4.11.4 Personal Protective Equipment
PPE is provided as per requirements of Safety Data Sheets.

4.11.5 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.

4.11.6 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).

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/events that increase or decrease likelihood of risk	Management measures
Flour & Ingredients spill	Minor short term harm to the environment.	Likely to occur, Minor Cat 4 (4)	Spill occurs near a watercourse, providing exposure pathway for offsite impacts.	**Pre-emptive measures:** • **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 provision and use of spill containment kits** • **Train all relevant personnel in the use of spill containment kits and site management practices** • **Any potential build up must be reported and recorded on maintenance request form.** **Responsive measures** • **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** • **Incident investigation must advise suitable controls to be implemented and to prevent recurrence**
Water pollution from Spills Entering Stormwater	Minor short Term Harm to the environment	Likely to occur, Minor Cat 4 (4)	Spill occurs near a watercourse, providing exposure pathway for offsite impacts. 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	**Pre-emptive measures** Follow the Pre-emptive measures that are in place for pollutants that could possibly enter stormwater as per flour spill. **Responsive measures** Follow the responsive measures that are in place for pollutants that could possibly enter stormwater as per flour spill.
Diesel Fuel spill Hydraulic spills	Minor short-term harm to the environment.	Unlikely to occur, Significant CAT 4 (5)	Spill occurs near a stormwater drain,	**Pre-emptive measures:** **Provision of spill containment.** **Train all relevant personnel in the use of spill kits.** **Responsive measures:** **Use of spill containment kits.**

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:

In Carpark from Main Office

4.13.2 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.

4.13.3 Alarm
There are no on-site alarms

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 situation.

4.13.5 Minor Chemical / Ingredient Spills
- Minor spills should be dealt with immediately as detailed in the Safety Data Sheets.
- 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 / Ingredient 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.

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

Specific training shall be provided to the appropriate staff on:
- First aid (training company)
- Use of site supplied fire fighting equipment (training company) FAA
- 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 annually, and the training of each worker shall be recorded and the records of training shall be retained in Allied Pinnacle Training Database.

4.15. Testing of the PIRMP

Testing of the PIRMP must be carried out annually.

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

The evacuation must be reported in Allied Pinnacle's Incident Reporting Database and any corrective actions to be raised following mock evacuation 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**
- **WHSE-024- Environmental Management Plan including PIRMP**
- **WHSE-008 Hazard ID, Risk assessment and control measures**
- **Townsville WHSE-002 Emergency Management Plan**

DOCUMENT APPROVAL and CHANGE HISTORY

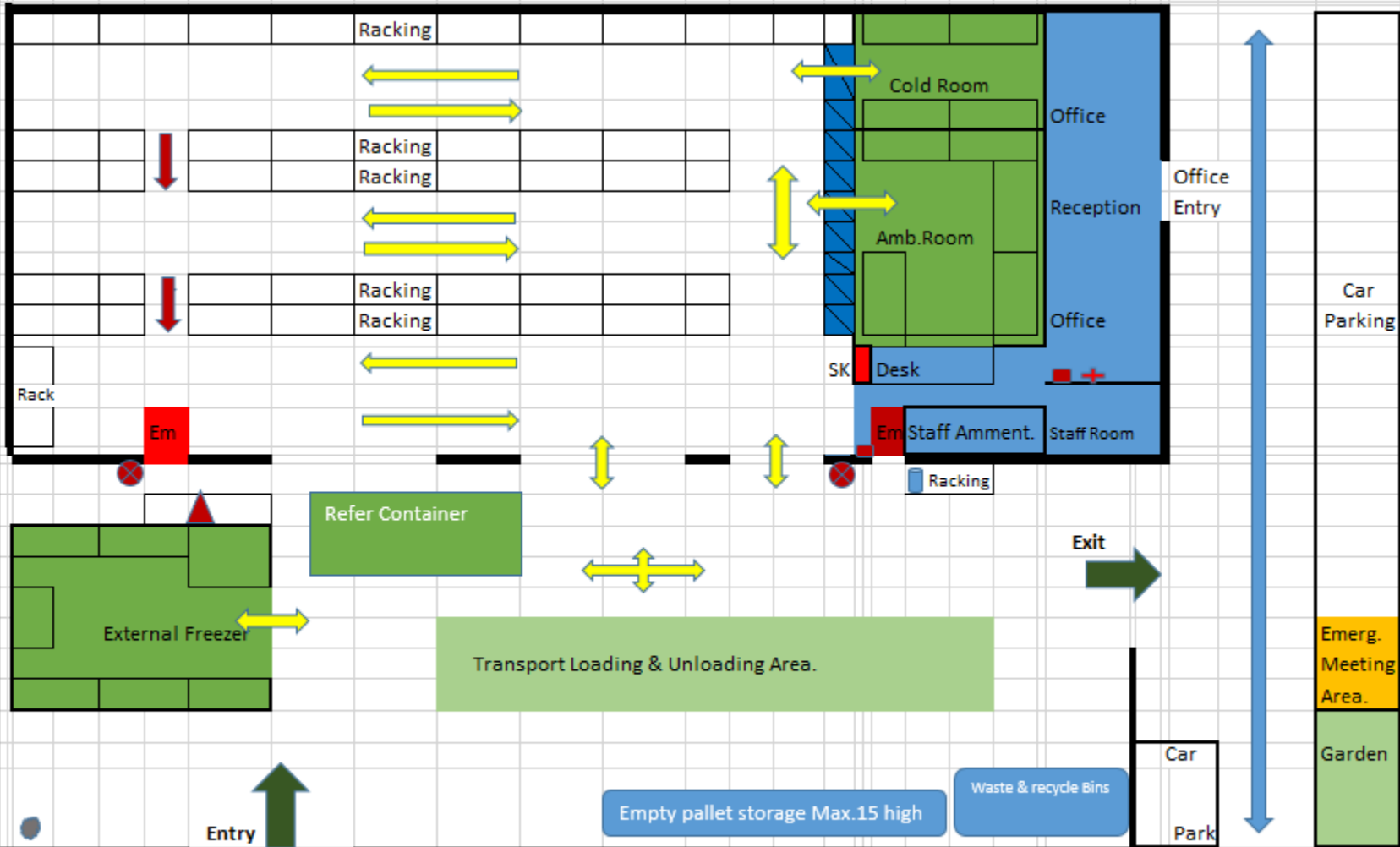| APPROVAL			
Action	**Position Title**	**Name (s)**	**Date**
New Document template controlled Version 2 to update to new format	National WHSE Manager	Maria Hooker	22/11/2018
Update Management details	National WHSE Manager	Maria Hooker	23/01/2023
Add new logo and update information	National WHSE Manager	Maria Hooker	20/04/2023

ALLIED PINNACLE TOWNSVILLE

SK Spill Kit, Forklift Traffic Area ⟷ , Fire Extinguishers ■ , Fire Hoses ⊗ , Cleaning Chems ▲ , First Aid ✚ , Emergency Exit E ,

Smoking Area ● , Site Speed Limit 5 kph.

Storm Water drain