

Pollution Incident Response Management Plan

55 Belmore Street Tamworth NSW 2340

June 2025

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Pollution Incident Response Management Plan

1. Pollution Incident Response Management Plan

- 1.1 The document is a Pollution Incident Response Management Plan (**PIRMP**) for 55 Belmore Street, Tamworth, prepared in accordance with Part 5.7A of the *Protection of the Environment Operations Act 1997 (the Act)*.
- 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 55 Belmore Street, Tamworth at all times, and must be made available to an authorised officer (being a person appointed under Part 7.2 of the Act by an appropriate regulatory authority) on request and to any person who makes a written request for a copy.
- 1.4 This PIRMP must be tested on an annual basis, and no later than 1 September each year, to ensure that the information included in the PIRMP is up to date and the PIRMP is capable of being implemented in a workable and effective manner. A record is to be kept of the annual tests (see Schedule 1).
- 1.5 This PIRMP 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 PIRMP is accurate and up to date and the PIRMP is still capable of being implemented in a workable and effective manner.

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2. What is “the Environment”?

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

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 **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 the regulations).

This is a very low threshold:

- (i) No actual harm is required, only threatened harm.
- (ii) The harm does not need to be significant, but only **non-trivial**.
- (iii) 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).

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3.4 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 Ministry of Health;
- (e) The WorkCover Authority; and
- (f) Fire and Rescue NSW.

For contact details for the relevant authorities for the *Allied Mills Site*, see section 9 of the PIRMP.

3.5 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.

3.6 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.

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

3.8 ‘**Immediately**’ has its ordinary dictionary meaning of promptly and without delay.

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

- 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** 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?).
- 4.3** 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.
- 4.4** 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.
- 4.5** 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.
- 4.6** 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.
- 4.7** 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.

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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
Noise	Minor short term harm to the environment.	Medium, B2	Not complying with the applicable environmental noise limit criteria as defined within the NSW Industrial Noise Policy	<p>A noise survey must be completed annually by a qualified external Contractor in accordance with conditions L2 and M4 if EPA licence 2127 and all recommendations to be implemented.</p> <p>All plant and equipment will be maintained and kept in good working order to minimise noise emissions.</p> <p>Noise emissions from the operations at Allied Mills must not exceed the applicable environmental noise limit criteria as defined within the NSW Industrial Noise Policy</p>
Dust	Minor short term harm to the environment.	Medium, B2	Dust extraction and collection systems are installed on site to minimise dust exposure	<p>Air monitoring to be carried every three years by an occupational hygienist. The measurement should be made accordance with AS3640 – 1989 Workplace Atmospheres – Method for Sampling and Gravimetric Determination of Inspirable Dust and all recommendations to be implemented.</p> <p>All activities in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust</p>
Grain spill	Insignificant harm to the environment.	Low, E1	Nature of product is not mobile to flow down to watercourse to cause exposure pathway to offsite impacts	Provision and use of suitable cleaning process and tools

Flour spill	Minor short term harm to the environment.	Medium, B2	Spill occurs near a watercourse, providing exposure pathway for offsite impacts.	<p>Stop the flow of the product from the Mill</p> <p>Provision and use of spill containment kits.</p> <p>Train all relevant personnel in the use of spill kits</p>
LPG leak	Minor short term harm to the environment.	Medium, B2	Leak would occur in outloading area which is in the open air.	<p>If any leakage is detected or suspected from a cylinder, turn it off immediately by turning off the cylinder valve.</p> <p>Site or Maintenance Manager to contact supplier</p>
Mechanical Oil spill	Minor short term harm to the environment.	Medium, B2	Spill occurs near a watercourse, providing exposure pathway for offsite impacts.	<p>Provision and use of spill containment kits.</p> <p>Train all relevant personnel in the use of spill kits</p> <p>Storage of oils in isolation areas with suitable bunding. Bunding must be provided around the oil tank, with a minimum capacity of 110% the volume of the tank.</p>
Natural Gas Leak	Minor short term harm to the environment.	Low, E3	Leak would occur indoors or in the yard area which is in the open air.	<p>If any leakage is detected or suspected from the system, apply appropriate PPE and isolate both valves at the meter.</p> <p>Contact 000 should leak continue.</p> <p>Site or Maintenance Manager to contact APA Group.</p>

6. 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
Low	<p>Potential for, but no actual harm.</p> <p>General environmental hazards (such as hazardous substances not stored in secure locations).</p> <p>Handling mishaps with fuels, oil, lubricants and/or hazardous substances not resulting in spillage.</p> <p>Loss of control of equipment not resulting in damage to vegetation or property.</p> <p>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.</p> <p>If the incident involved potential non-trivial environmental harm, it must be immediately reported to relevant authorities.</p> <p>Incident notification record must advise suitable controls to be implemented in future situations to prevent recurrence.</p>
Medium	<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.</p> <p>Its consequence/impact are measured as moderate and include some or all of the following aspects:</p> <ul style="list-style-type: none"> Material easily contained and recovered; Is confined to work site boundaries; Involves minimal or minor interruption to work activities; Complaints easily handed at the worksite; 	<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.</p> <p>The incident must be immediately reported to relevant authorities.</p> <p>Incident notification record must advise suitable controls to be implemented in future situations to prevent recurrence.</p>
High	<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"> Actual or potential breach of environmental legislation or licence; Moderate to serious actual or potential environmental harm. 	<p>Site staff must report incident to the Site Manager. Site manager will notify General Manager & National WHS Manager immediately, and an incident notification record must be produced immediately after the incident.</p> <p>The incident must be immediately reported to relevant authorities.</p> <p>Incident notification record must advise suitable controls to be implemented in future situations to prevent recurrence.</p>
Extreme	<p>National press coverage.</p> <p>Regulatory investigation and significant penalties/fines incurred and potential or actual loss of licence.</p> <p>Major community impacts.</p> <p>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 & National WHS Manager immediately, and an incident notification record must be produced immediately after the incident.</p> <p>Allied Pinnacle Executive Management must notify relevant authorities immediately.</p> <p>Allied Pinnacle shall provide a full incident investigation report to the relevant authorities as soon as practicable after the incident has</p>

7. Inventory of Pollutants

Grain	approximately 3,000 tonnes
Flour	approximately 300 tonnes
Wheat Based Products	approximately 300 tonnes
Mechanical Oil	200 litres (maximum)
Kerosine	200 litres
LPG	10 x 15kg exchange cylinders for forklifts

8. Safety Equipment

- 8.1** 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

Dust – Grain and Flour

Dust Collectors and Extraction systems are located in the Grain Intake, Screenroom, Mill and Packing area which are regularly inspected and maintained and included on the site Preventative Maintenance Schedule. Records are retained on site

Noise

Noise is minimised through the milling process with engineering controls on plant and equipment and all most plant and equipment is used in an enclosed area.

Spill Kits

Spill kits are located in the following areas:

- Weighbridge – Flour Outloading
- Grain Intake area
- Laboratory
- Maintenance Workshop
- HT Plant
- Mill 2 Outloading Driveway

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

Spill Response Kits shall be inspected every three months.

Personal Protective Equipment

- Gas monitor available for use
- Respiratory equipment 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

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	Environmental Phone Line – 131 555
Local Council	Tamworth Regional Council – (02) 6767 5555, 1300 733 625
Ministry of Health	General – 1300 066 055 Tamworth Office – (02) 6764 8000
WorkCover Authority	13 10 50
Fire and Rescue NSW	1300 729 579

10. Contact Details

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
Dean Bliss (<i>responsible for activating the PIRMP</i>)	Site Manager	0400 621 256
Matt Cook (<i>responsible for activating the PIRMP</i>)	Maintenance Manager	0447 967 700
Peter Farrant (<i>authorised to notify relevant authorities</i>)	Head of Safety & Wellbeing	0455 534 074
Manjiv Fernando (<i>authorised to alert the relevant authorities</i>)	Head of Milling & Mixing Operations	0418 592 557
David Pitt (<i>authorised to alert the relevant authorities</i>)	Chief Executive Officer	0419 756 775

11. 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:

- | | |
|----------------------------------|----------------------|
| 1. The Locomotive Hotel | Currently Unoccupied |
| 2. David Nicholls Optometrist | 02 6762 5061 |
| 3. Central Secure Storage | 02 6765 7433 |
| 4. Capital Body Works | 02 6765 5944 |
| 5. O'Brien Auto Glass | 1800 053 598 |
| 6. Planet Fitness | 02 5776 1199 |
| Papilio Early Learning Centre | 02 5602 5670 |
| 7. Little Stars Childcare Centre | 02 5701 5560 |
| 8. Edwards & Froud | 02 6762 5344 |
| 9. Multiquip Transport | 02 9606 9011 |

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

Advice 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.

12. Minimising Harm to Persons of the Premises

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 either evacuation areas: Belmore Street or Reserve Street entrances and advise them of current status

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 at 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.
- 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.

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13. 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 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

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.

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