NORCO FOODS, RALEIGH

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

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POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

1. Purpose

This Pollution Incident Plan has been developed to:

- To decrease the level of risk to life, property, and the environment.
- To increase potential of sustaining business operations.
- Meet the requirements of the EPA and all other regulatory bodies.
- To control any incident and reduce its effects.
- Provide all Norco Foods personnel with systems, procedures and documentation necessary to cope with any environmental emergency.

2. Scope

This plan applies to the Norco Foods Raleigh Factory Site.

- Materials Handling
- All Manufacturing Functions
- Building Repairs and Construction
- Waste water Treatment Plant and Irrigation System

3. Site Location and Plan

The Norco Foods factory is situated on the banks of the Bellinger River at Raleigh, just 20 minutes drive south of Coffs Harbour on the Mid North Coast of New South Wales. The site covers approx 5 acres and is bordered by farmland, a couple of homes, and there is a primary school across the road. The factory currently produces white milks, flavoured drinks, custard and cream, as well as skim milk concentrate.

The factory has been on site for over 100 years, some of the buildings are very old, but in 1997 there was an upgrade which saw the insides of the buildings refurbished to accommodate a more modern processing plant. At the same time Citect was installed to control the new plant, and it is constantly being updated to keep in line with new technologies.

All of the waste water, waste milk, and chemicals are captured and put through a DAF plant which brings the BOD's to less than 10 ppm. The treated water is constantly monitored, and tested by an independent Laboratory. There is a Licence to discharge into the Bellinger River, and in 2005 an irrigation scheme was installed to send treated water to a farm 3 klms away. Treated water is also irrigated onto Norco land located adjacent to the waste water plant.

A plan of the Site is included in Appendix 4

4. Environmental System

The site has an existing Environmental Emergency Plan, a Spill Contingency Plan, a Flood Management Plan, a Waste Management Plan, and a Dangerous Goods Licence.

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5. Terms and Definitions

The following terms, abbreviations and definitions are used in this plan:

Terms	Explanation
LPG	Liquefied Petroleum Gas
CEO	Chief Executive Officer
SES	State Emergency Services
MSDS	Material Safety Data Sheet
DECCA	Department of Environment and Climate Change
PIMRP	Pollution Incident Management Response Plan
ARA	Appropriate Regulatory Authority

6. References, Standards, Codes & Regulations

All work shall be done in accordance with relevant standards, codes, acts and regulations (Refer Appendix 3).

7. Policy

The Company maintains an Environmental Policy (ref. App.1) which is:

- Displayed at prominent locations on the site
- Communicated to site personnel during induction and training
- Made accessible to clients and concerned / interested members of the public

All personnel must comply with the spirit and intent of the policy.

8. Objectives

Key Environmental Objectives for this factory are as follows:

Objective	Target	Reporting / Monitoring
Effective site environmental controls	Maintain effective controls, and Audit Annually	Environmental Inspection checklists
Environmental performance	Zero major (level 2 and above) environmental incidents and no breaches; no infringement notices from the EPA / local authorities. Any minor incidents, such as minor spillages, dealt with quickly and efficiently. All environmental spills to be reported to the Factory Manager within 24 hrs of occurrence. Level 2 and above must be reported immediately.	Fortnightly reports to Decca Display results on Norco Web Site. All incidents must be reported to regulatory authorities immediately
Effective implementation of the environmental system	95% or better audit results	Audit report
Community issues carefully managed	Zero valid complaints; All complaints responded to within 24 hrs.	Complaints Book

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9. Responsibilities and Authorities

Authorities and responsibilities for all positions are defined and communicated in Job Descriptions and project documentation.

Key responsibilities and authorities include:

Company Directors
Company Chief Executive Officer

General Manager Norco Foods

Site Manager

- Ensure that all incidents are immediately reported to the relevant governing bodies
- Provide adequate resources to meet environmental objectives
- Ensure that the pollution incident response plan is effectively implemented and maintained
- Approve the pollution incident management plan
- Appoint/nominate the Factory Environmental Representative
- Report on the performance of the system and environmental breaches
- Organise and manage site plant, labour
- Take action to resolve environmental non-conformances and incidents
- Ensure suppliers and subcontractors comply with requirements
- Report environmental incidents to Norco Foods General Manager.
- Ensure that factory responsibilities and authorities are defined and communicated.

Engineering Manager

- Supervising all site maintenance/ construction activities and personnel by ensuring that they meet environmental and other requirements
- Ensure that site environmental controls are properly maintained
- Report all environmental incidents

Site Management Personnel

- Implement the EIMRP
- Ensure that site personnel are aware of their environmental obligations
- Take action to resolve non-conformances and incidents
- Ensure that site environmental controls are effective and maintained

Co-Ordinator's

- Report to the immediate manager on environmental issues, breaches, etc.
- Ensure that site environmental controls are effective and maintained
- Report all environmental incidents

Safety / Environmental Officer

- Ensure that the EMP is effectively established, implemented and maintained.
- Ensure compliance with all relevant statutes, regulations, rules, procedures, standards and policies.
- Ensure that all personnel on site receive appropriate environmental induction and training and are aware of their environmental responsibilities under relevant legislation and the contract.
- Report to the Factory Manager on the performance of the system and improvement opportunities.
- Provide support to any project team to enable them to meet their environmental commitments.
- Ensure that environmental records and files are collected and maintained.
- Regular compliance checking as per clause 18 of this plan.
- Ensure that non conformances and environmental incidents are recorded, reported and actioned.
- Ensure that environmental controls, materials and equipment are maintained.
- Conduct regular audits.

Subcontractors

- Comply with all legal and contractual requirements
- Comply with site environmental requirements
- Comply with management / supervisory directions
- Participate in induction and training as directed
- Report all incidents
- Comply with the relevant Acts, Regulations and Standards
- Comply with the Company's environmental policy and procedures
- Promptly report to management on any non-conformances, environmental incidents and/or breaches of the system
- Undergo induction and training in environmental awareness as directed by management
- Report all incidents

10. Environmental Risk Assessment and Control

Environmental audits are completed every 12 months, and action taken to reduce risk when required, as per example at *Appendix 7*.

Samples of the treated waste water are taken daily and tested by an independent laboratory.

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11. Legal and Other Requirements

It is essential that all management, factory personnel and contractors comply with legal, and other environmental requirements as shown in Appendix 3.

Project Procedure Site Rules
Federal Legislation
Environmental Protection and Biodiversity Conservation Act
National Pollutant Inventory
Emission to Air, Water, and Land
State Legislation
Environmental Planning and Assessment Act
Environmental Planning Policy

12. Training, Awareness and Competence

Norco Foods Raleigh shall ensure that all employees receive suitable environmental training, are aware of their responsibilities, and are competent to carry out the work.

Environmental requirements will be explained to employees during site induction, Labour hire company inductions and on-going training via tool box meetings, packhall meetings briefs, notifications and the like.

All employees (including subcontractors) shall receive induction / training in the following:

- Environmental Policy
- Site environmental objectives and targets
- Understanding individual authorities and responsibilities
- Site environmental rules
- Potential consequences of departure from rules
- Emergency procedure and response (eg. Spill clean-up)
- Basic understanding of their legal obligations
- All staff trained and refreshed on a 12 monthly basis and within one month of a incident.
- Revision and testing of plan at 12 monthly intervals and within one month of an incident.
- All training must be documented and updated

Personnel performing tasks that can cause significant environmental impacts shall be competent on the basis of appropriate education, training and / or experience.

13. Communication and Reporting

With respect to the functioning of the factory's environmental system, Company employees, management, and other interested parties shall be kept informed as necessary.

Internal communication methods include:

- Management reports
- Site inspection reports
- Audit reports
- Incident reports
- Noticeboards
- Site meetings

- Employee induction, training and tool box sessions
- Briefs, notifications and alerts

External communication methods include:

- All significant BOD results notified to DECCA as per licence.
- Daily treated water test results sent to DECCA as required.
- Meetings and correspondence with interested parties (eg. Local council and DECCA) as necessary.
- All pollution incidents must be reported immediately
- All relevant authorities must be notified
- Dial 000 If there is a threat to human health or property eg Fire Hazmat
- Or if potential damage may exceeds $10,000.
- If the incident does not require an initial combat agency the following relevant authorities must be notified.
- ARA The appropriate regulatory authority for the activity under the POEP Act (usually the EPA or local council)
- The EPA (if it is not the ARA) phone 131555 (24hr)
- The Ministry of Health Phone 000 Lismore northern branch 66202100
- Work Cover Authority Phone 131050 Coffs Harbour Branch 66591700
- The local authority (local Council) if not the ARA Bellingen branch 66557300
- Fire and rescue NSW Local Stations Urunga(66556309)Bellingen (66551433)
- Fire and rescue NSW 1300 729 579
- Raleigh primary school 66554228
- Neighbouring home George Finney 66554695
- Neighbouring home Mark White 66554512 Mobile 0413315320
- Neighbouring home B Regan (Walking distance)
- Oyster Farmer Mick Swanston Phone 66556345

14. System Documentation

The Company's Environmental System is part of an integrated management system.

Information is available on the Norco Co-Operative Computer System.

15. Document Control and Records

All project documentation, including environmental records, shall be controlled in the Fast-track Document System.

Environmental records shall be:

- kept as objective evidence of compliance with environmental requirements;
- filed in accordance with the DECCA regulations;
- Environmental incident reports will be copied to the Management team.

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16. Operational Control

General

Specific operational controls to manage significant environmental issues are defined in either or all of the following:

- Appendix 2 of this plan
- Risk Assessments, GMP check sheets (as appropriate)
- Work instructions

17. Emergency Preparedness and Response

The types of environmental emergencies which could occur on this site are shown in Appendix 5.

The client and relevant statutory and regulatory authorities shall also be informed as necessary.

Environmental incidents shall be handled as follows:

- Immediately report all incidents to the Project / Site Manager who shall assess the situation and manage the following steps:
  - Immediately take all reasonable steps to contain further damage or danger to personnel and the environment
  - Contact emergency service personnel as necessary (eg: fire dept, spill clean-up services, etc).
  - Inform the client and other relevant authorities as necessary
  - Complete a detailed report of the incident using DFRA-FOR-142 Environmental Investigation Report.
  - Initiate corrective and preventive action

Information on the handling of hazardous materials are contained in the MSDS file.

Emergency Services contact numbers are to be displayed in the main site office.

18. Monitoring and Measurement

Key characteristics of the factory operations which could have a significant impact on the environment shall be regularly monitored and measured.

This shall include:

- recording of information to track performance;
- monitoring operational controls;
- level of conformance with objectives and targets.

A monthly GMP audit checklist (DFRA-FOR-001) shall be used to monitor environmental issues on site, issued to Management, and discussed at the weekly review meetings. Where deemed necessary, Action plans to control potential impacts will be developed.

If monitoring and measuring equipment is required, then it shall be calibrated, maintained and controlled in accordance with HACCP procedures.

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19. Incidents, Complaints, Corrective and Preventative Action

Environmental incidents must be reported so that they can be investigated and prevented from recurring. The following incidents must be reported:

A reportable incident shall include any of the following:

- An Incident that could result in a fine or penalty
- Breach of the licence condition, Act or regulation
- Any incident that is required to be reported to the applicable authority
- All public and client complaints
- Near miss with the potential to cause environmental harm
- Unauthorised and/or uncontrolled fire or explosion
- Unauthorised visual pollution
- Oil, fuel or chemical spills – Any drips or spills other than those which could be contained or bunded; any contamination of water; any non-toxic, non-hazardous spill (eg. oil) on land ; Any leaking equipment, plant, vessels or containers. All spills should be reported regardless of size.
- Noise and vibration – all noise and vibration which exceeds the maximum allowable level at the site boundary or nearest sensitive receptive; when a complaint is made; any marked or discernible increase in noise from equipment or operation
- Dust / Air Quality / Odours – Exceeds the allowable limit; public complaint, or visible dust migration across the site boundary.
- Waste – Waste from site is outside the boundaries; failure to adhere to the site waste management system
- Sediment control – damaged, ineffective controls; uncontrolled releases.
- Pollution of waterways
- Flora and fauna – unauthorised/unplanned damage to flora and/or fauna.
- Unauthorised dumping to landfill

All environmental incidents and complaints relating to the environment shall be:

- Reported to the Norco Foods General Manger.
- Reported using the Environmental Incident Report Form DFRA-FOR-141
- Investigated and actioned to correct the problem and prevent a recurrence using

The Environmental Investigation Report Form DFRA-FOR-142

Incidents will be classified as either **major** or **minor** as follows:

Major Non-conformance *(Any one of the points listed>)*	• Significant adverse affect on health and safety of personnel. • Contravenes approval licenses, government regulations, policies, etc. with risk of penalties, fines or notices being issued • Effects may be irreversible and/or costly to fix • Significant level of valid public or client complaints • Public image of Company adversely affected • Rare, endangered or protected species destroyed
Minor Non-conformance	• Effects are easily reversible; • Health and safety of personnel not placed at significant risk. • Minor irritation or nuisance • Public image of Company unaffected

The supervisor who is responsible for that section of work normally handles minor incidents.

All Major and Minor incidents must be referred to the senior manager on site who shall take appropriate action and notify the following:

- All relevant authorities
- Norco Foods Group General Manager
- Environmental Team personnel

The senior manager on site should notify the Environmental Coordinator of the following environmental incidents:

- All spills of product or chemicals outside primary containment areas;
- Continuing or recurring spills and leaks from storage tanks or pipe work.

Notification to the General Manger and Regulatory Authorities shall be immediate.

Where necessary, the relevant Government administering authorities including (DECCA) and the Corporate Solicitor.

Management system non-conformances and recurring environmental incidents shall be handled in accordance with DFRA-FOR-141 and DFRA-FOR-142

Corrective and preventive actions may include:

- Site clean-up
- Increased site inspections and monitoring
- Increase environmental awareness (re-training, tool-box meetings)
- Review and improve existing environmental controls

20. Environmental Management System Audit

Auditing of the Environmental Management System shall be carried out in accordance with following procedure.

The Factory Manager, in consultation with the other managers, shall decide on the frequency, scope and timing of site audits.

It is expected that the site will be audited at least every 12 months. An audit report shall be issued to management for action.

A copy of the report shall also be issued to the Environmental team at the next meeting.

21. Management Review

Factory Management shall review the status and adequacy of the Factory Environmental Management Plan to ensure that it meets current Company requirements as well as relevant environmental standards.

The Plan shall be reviewed as and when required when the following situations arise:

- Company Management recommendations for changes (particularly following initial review)
- Changes to the Company's standard system

- Opportunities for improvement or deficiencies in the factory system are identified.
- Following an audit of the system

Suggested topics include:

- Changes to site rules
- Incident trends and corrective actions
- Close-out of audit results
- Updates to the EMP
- Effectiveness of controls
- Adequacy of resources and training
- Opportunities for improving environmental performance
- Achievement of objectives and targets

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APPENDIX 1 RISK ASSESSMENT AND CONTROLS

Aspect	Potential Impacts	Likely-hood	Conseq uence	Risk Ranking	Potential Control Methods
Water Quality (due to construction works and operation of plant)	• Sedimentation of creeks and watercourses including marine waters	P	3	M	• Maintain existing erosion and sedimentation control devices; establish additional devices if directed by the client. • Absorb and remove oil and grease from water prior to release • Minimise run off water velocities • Stabilise exposed earthworks as early as possible • Utilise wash down and service areas for plant and equipment on site • Provide awareness training in the need to maintain water quality • Treated waste water shall be disposed of in accordance with Site disposal procedures • Any work in waterways and drains must have prior approval of the Environmental Officer.
	• Degradation of local habitats	P	3	M	
	• Wastewater escaping from site	P	2	M	
Soil, Air and Water Quality (due to fuel supply, hydrocarbon and chemical storage)	• Degradation of surrounding environment	P	3	M	• Absorb and remove oil and grease from water prior to release • Utilise wash down and service areas for plant and equipment on site • Provide awareness training • Provide bunded and secure storage areas for fuel, oil and other liquid containers • Fuelling operation carried out in a manner to prevent spillage, and driver or operator to be in attendance at all times • Provide absorption material at refuelling and storage areas • Notify the client of any fuel supplier intending to enter site • Escort fuel suppliers travelling on site • Ensure that mobile fuel tanker is maintained, is provided with spill kits and the operator is competent – training shall be provided where necessary. • Supervise the transfer of all hydrocarbon products and prevent spillage • Immediately clean up all spills; dispose used absorbents in accordance with the site's waste management procedure
	• Fuels, Oils and contaminated waste water escaping from site	P	3	M	
	• Fuel and oil leakage from storage areas or refuelling operations	P	3	M	
	• Leakage of hazardous materials from storage areas	P	3	M	
	• Potential for fire / explosion	P	3	M	

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Aspect	Potential Impacts	Likely-hood	Conseq uence	Risk Ranking	Potential Control Methods
Waste Management (due to construction works and site facilities)	• Waste of natural resources	P	4	M	• Provide bunded and secure storage for hazardous liquid waste (oils etc) • Segregate recyclable waste where practical – refer to Waste Disposal System • Dispose of waste to appropriate approved facilities & where required by licensed contractors • Septic pump-out by licensed contractor • Provide awareness training in the need for waste management • Treat and/or contain contaminated waste material until disposal to approved waste facility • Provide environmental awareness training
	• Contaminate surrounding environment (air, land and water)	P	3	M	
	• Uncontrolled release of waste to surrounding areas	P	3	M	
	• Unauthorised disposal of waste	P	3	M	
Flood and Stormwater Control	• Washing away of partially constructed works	U	2	M	• Where possible secure partially constructed works • Where possible provide levee banks to contain waters & or protect property • Evacuate all non essential personnel • Remove or secure vulnerable plant and equipment • Maintain sediment traps and drainage structures to operating capacity
	• Overtopping of sediment traps & drainage structures	U	2	M	
	• Scouring & erosion of areas on site	U	3	M	
Energy Use (due to construction works)	• Non productive use of Energy	U	4	L	• Shut down plant & equipment when not in use • Where possible turn off lights & electrical equipment when not in use • Provide awareness training in the need to conserve energy • Ensure plant & equipment is well maintained
	• Production of Greenhouse Gases	L	5	L	
Community Issues	• Disruption to traffic	U	4	L	• Prevent trespassing on neighbouring property • Record, investigate and close out community / neighbour complaints • Proactively monitor community concerns (both during and outside production hours)
	• Reduced amenity due to production noise	U	4	L	
	• Adverse response from the community in relation to the factory; poor neighbour relations	U	4	L	

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ENVIRONMENTAL RISK ASSESSMENT RANKINGS

For each identified aspect, consider the 'maximum credible' (not absolute worst case) risk that could result with minimal or no controls other than existing and using normal construction practices.

Note: Any one of the listed consequences must result in the use of the applicable consequence grading.

Select a letter and a number from each column. Plot letter and number selections on the Risk Ranking Matrix to determine applicable ranking:

LIKELIHOOD (Probability & Frequency of Occurrence)			**CONSEQUENCE (Outcome or Severity of Occurrence)**		
C	Certain	Common or repeating occurrence	1	Major	Major pollution incident causing significant damage or potential to health or the environment
L	Likely	Known to have occurred / "has happened"	2	Significant	Significant pollution incident causing damage or potential damage to health or the environment external to the site. Potential for prosecution. Numerous substantial complaints
P	Possible	Could occur / "heard of it happening"	3	Moderate	Reportable incident to EPA or other authority. Substantial breach of legislative, licence or guideline requirements. Possible fine. Will cause complaints.
U	Unlikely	Not likely to occur	4	Minor	Pollution incident that marginally exceeds licence conditions or guidelines for acceptable pollution. Fine unlikely. Potential for complaints.
R	Rare	Practically impossible	5	Insignificant	Insignificant pollution incident. Fully contained on site and can be fully remediated. Little potential for fine or complaints.

Probability ► Consequence ▼	CERTAIN	LIKELY	POSSIBLE	UNLIKELY	RARE
1 - Major	H	H	H	H	M
2 - Significant	H	H	H	M	M
3 - Moderate	H	H	M	M	L
4 - Minor	M	M	M	L	L
5 - Insignificant	M	L	L	L	L

Risk Assessment Rankings: H = High M = Medium L = Low

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APPENDIX 2 LEGAL and OTHER REQUIREMENTS

A comprehensive approach to addressing regulatory requirements includes:

- Developing a plan that incorporates environmental management
- Undertaking staff training and supervision
- Completing a self-assessment or independent audit

Legal and other requirements	Summary of obligations as it affects the factory
General Environmental Duty Environmental Assessment Amendment Act 1994	• The object of this Act and Regulation is to protect the State's environment while allowing for development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends. Unlawful environmental harm is made a specific criminal offence with a range of financial and custodial penalties under the provisions of the Environmental Assessment Amendment Act 1994. • The act imposes a general environmental duty, which requires the use of all reasonable or practicable measures to prevent or minimise environmental harm. • In addition to complying with the requirements of this Act, the factory must also comply with any Environmentally Relevant Activity approval requirements. • Take all practical and reasonable steps to prevent or minimise environmental harm. • Notify the authorities of potential or actual, serious or material, environmental harm • Ensure that environmental relevant activities have approvals or Licences.
Air Emissions Environmental Protection Regulation (Air) Policy 1997	• Do not create an unreasonable release of contaminant (dust, odour, smoke, etc) or prescribed contaminant into the air. • Materials must be handled in a proper and efficient manner that does not cause air pollution. • Comply with any "show cause notice" or "abatement notice"
Land Contamination Environmental Assessment Amendment Act 1994	• Do not remove or dispose of contaminated soil from land (for which particulars are recorded in the register at the Environmental Protection Authority) without a disposal permit from the department. • Notify the owner of the land if contamination is discovered. • Any contaminated soil on site will be properly disposed of.
Dangerous Goods Dangerous Goods Act, 1996 Dangerous Goods Regulation, 2003	• Ensure that all dangerous goods or combustible liquids are identified, and properly stored to prevent accidental spillage. • Premises must be licensed and comply with Australian Standards if certain flammable or combustible liquids in sufficient quantity are to be stored. • Only small quantities of hazardous materials will be held on site

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Fire (Burning Off) EPA Fire and Rescue Authority Act 1990 Fire and Rescue Services Reg 2001	• No burning off will be permitted on this site. Activities that could cause a fire (eg. Welding) will be strictly controlled.
Noise Environmental Protection (National Pollution Inventory) Objective, 2004	• Do not make an unreasonable noise • Comply with "show cause" or "abatement notice" from the Environmental Protection Authority • Comply with any building (noise) permits • Comply with Site Operational Work Hours.
Native Flora and Fauna Nature Conservation Act 1992 Nature Conservation Regulation 1994 Environmental Protection and Biodiversity Conservation Act 1999 Fisheries Act	• Do not take, use, keep or interfere with cultural and natural resources, protected wildlife and protected plants.
Surface and Groundwater Contamination Environmental Protection Act 1994 Water Resources Act 1989 Environmental Protection (Water) Policy 1997	• Do not release certain things into, or place those things near a roadside gutter, stormwater drain or water body, etc. This includes rubbish, building waste, sediment, sawdust, cement, concrete, paints, oils, degreasing agents, etc • Do not release stormwater run off into, or deposit sand, silt or mud in, a roadside gutter, stormwater drain or water that results in the build-up of sand, silt or mud in that gutter, drain or water. • Do not cause water pollution by any act or omission
Trade Waste Sewerage and Water Supply Act 1949 Standard Sewerage Law Water Act 2000	• Do not discharge trade waste or other prohibited substances into stormwater drain or sewerage.
Waste Management Environmental Protection Act 1994 Environmental Protection (Waste Management) Regulation 2000 Waste Management and Pollution Control Act 1998	• All waste is to be disposed of at an approved facility. An approved facility includes one that has the appropriate development approval, EPA Licence or is complying with EPA approved conditions and requirements. • No illegal dumping of waste permitted • Use only approved waste contractors to remove waste • Prevent loss of waste from a vehicle during transport
Dangerous Goods Act 1996	• General duties and offences in relation to dangerous goods.
Heritage Conservation Act 2000	• Identification, assessment and declaration of heritage places and objects.
Waste Management and Pollution Control Act 1998	• Guides to carry out Environmental Audits
Licences and Approvals	• Licensed waste removal contractors to be used • Painting contractor (if used) to be licensed

Access to this legislation is available on the Internet at www.austlii.edu.au

It shall be kept up-to-date and made accessible to all personnel.

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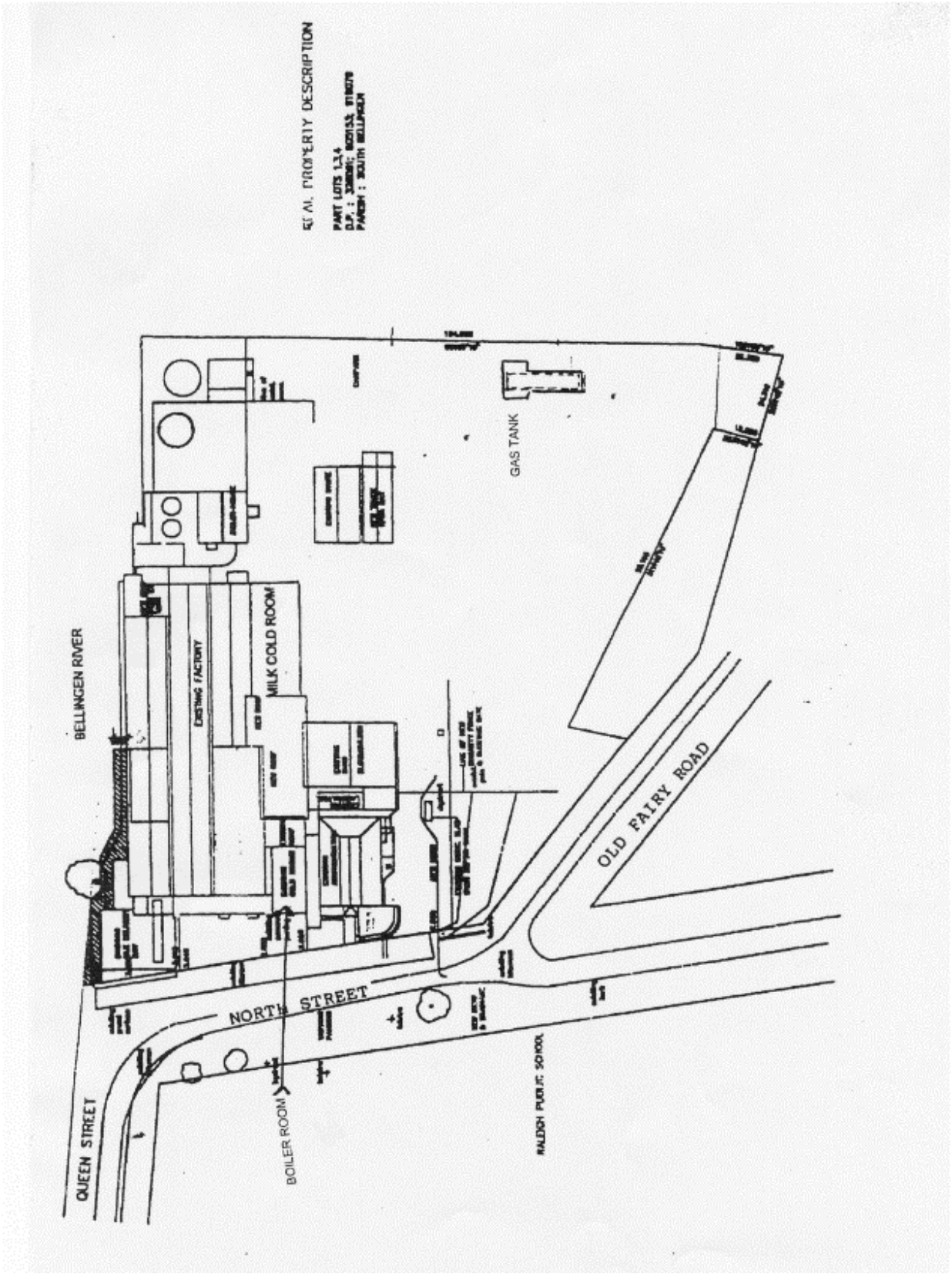
APPENDIX 3 NORCO FOODS RALEIGH SITE LOCATION AND PLAN



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APPENDIX 4 EMERGENCY PREPAREDNESS and RESPONSE

The types of environmental emergencies that could occur on this site are tabulated below.

Type of Emergency	Preparation for Emergency	Response to the Emergency
Minor spill of hazardous or toxic substance (< 20L)	• Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • MSDS on site for all materials and kept up to date • Adequate supply of absorbent materials available in the site compound and on vehicles at work location	• Report spills immediately to Site Manager and/or the Project Environmental Representative • Attempts to be made to limit or contain the spill using spill kit to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile to contain the spill. • Site Manager and Supervisors to coordinate the response, clean up and disposal of the material • Material to be disposed of in accordance with the manufacturers recommendations and applicable legislation • Close off storm water valves and pump spill to IAF plant
Major spill of hazardous or toxic substance **(> 20L)** **Contact Manager** **Major spill of hazardous or toxic substance (Cont.)**	• Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • MSDS on site for all materials and kept up to date • Adequate supply of absorbent materials • Emergency telephone numbers prominently displayed around office and issued to supervisors	• Report spill immediately to Site Manager • Attempts to be made to limit or contain the spill using sand bags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill, righting overturned containers, transferring remaining material. • Implement procedures to notify the relevant authorities in accordance with the client's requirements. • Site Manager to coordinate the response, clean up and disposal of the material • If spill is regarded to be outside the onsite resources, then the fire brigade should be called • Where appropriate, evacuation procedures are to be implemented to remove non-essential personnel from the affected area • Emergency response members are consulted. • On site client personnel are informed of the incident • Access and egress to the area is established to ensure the appropriate vehicles have effective access and congestion is minimised. • If the fire brigade attends, their senior officer assumes control of the operation with factory personnel assisting as required.

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Type of Emergency	Preparation for Emergency	Response to the Emergency
		• A full investigation report of the event is to be completed by the Environmental Representative as soon as practicable after the area has been secured.
Flood	• As per Flood Plan • Remove plant and equipment from low lying areas • If plant cannot be removed ensure it is secured and in a position where it is unlikely to cause damage • Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • Monitor flood warnings	• Stow all minor and small equipment into containers that are to be sealed. • Ensure all other materials and plant are either removed from flood affected areas or stowed and secured • All chemicals, fuels and other hazardous substances to be in secured containers and stored within a sealable shipping container • Ensure that construction materials and rubbish does not leave the site
Cyclone /Severe Storm / High Wind	• Monitor cyclone/storm warnings for the area • Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • Ensure First Aid supplies are well stocked and adequate	• Evacuate all nonessential personnel • Secure all plant, equipment and materials • Remove plant and equipment from flood prone areas • If plant cannot be removed ensure it is secured and in a position where it is unlikely to cause damage • Stow all minor and small equipment into containers, which are to be sealed. • Ensure all other materials are either removed from flood prone areas or stowed and secured
Fire (other than bushfire)	• Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • Fire extinguishers maintained, clearly labelled and distributed around site compound and vehicles • Training in the use of fire extinguishers and which one to use for each type of fire • First Aid supplies are stocked and adequate	• For small fires, attempts to be made to extinguish the fire or limit its spread with available fire extinguishers or water hoses if appropriate. • Supervisor is to be informed immediately. • Supervisor to contact client and external services where necessary (fire, ambulance) as a precautionary measure. • All personnel in the vicinity to be assembled in the Assembly Area and a head count performed • Any resulting fuel or chemical spill to be handled as detailed above • Supervisor to coordinate with emergency services and provide assistance as required.

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APPENDIX 5 WASTE DISPOSAL

Refer to Waste Management Plan Appendix 8

Waste on site shall be handled in accordance with the following table where practical.

WASTE TYPE	DISPOSAL	NOTES
General waste Food scraps etc.	General Rubbish skips	Handybin to arrange disposal
Recyclable waste (paper, cardboard, plastic bottles etc)	Respective Recycling skip	Handybin to arrange disposal
Waste oil	Waste oil drums	Waste oil taken by recyclers. A certificate of removal to be received
Oily Waste (Rags, absorbents, floor sweeps etc)	General Rubbish Skip	Handybin to arrange disposal
Oil filters	Filters to be drained and sent to scrap recyclers	Coffs Metal Recyclers
Inert waste (broken pallets etc)	General Rubbish skip	Handybin to arrange disposal
Scrap metal	Scrap Metal Skip	Coffs Metal Recyclers
Empty drums	Store in Waste Oil area	Recyclers
Air filters	General Rubbish Skip	Handybin to arrange disposal
Batteries	Scrap Metal Skip	Coffs Metal Recyclers to arrange disposal
Asbestos	Contact ENV Solutions	ENV Solutions to arrange disposal

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 6 ENVIRONMENTAL AUDIT

KEY: P = PROVE; A = ACTION; Y = YES; N = NO; DK = DON'T KNOW; NC = NEEDS CLARIFICATION; UC UNDER CONTROL; IP = IN PROGRESS; OK = ACCEPTABLE

DESK TOP : PHASE I - SPILL PLAN SURVEY & MANAGEMENT SYSTEMS REVIEW

1	Describe the existing Emergency Plans on site EMERGENCY PLAN, FLOOD MANAGEMENT PLAN, ENVIRONMENTAL EMERGENCY PLAN DFRA-MAN-002	Disaster Recovery Non Specific Emergency Procedures Specific Emergency Procedures	[Y] [Y] [Y] [Y]
2	Do the existing procedures cover specific spill response procedures? (e.g. Flow Charts, Method Statements, Personal Action Plans)		[Y]
3	Does the plan detail the responsibility of the Company Directors?		[N]
4	Does the plan detail the responsibility of the Company Heads of Department?		[Y]
5	Does the plan detail the responsibility of the Company Department/Section Managers/Shift Managers?		[Y]
6	Does the plan detail the reactive-defensive procedures and objectives for the site? (e.g. Specific Method Statements, 24 Hour Response)		[Y]
7	Does the plan detail the proactive-offensive procedures and objectives for the site? (e.g. Inventory Management, Risk Reduction Programmes)		[Y]
8	Does the plan include a 'near miss' or review procedure?	Near Miss Post Event Review	[Y] [Y]
9	Who implements the improvement action and risk reduction programme?	Name ENVIRONMENTAL COMMITTEE Evidence of Minutes?	 [Y]
10	Who maintains the plan? How are modifications made? MANAGEMENT AUTHORISES Evidence seen?	MANAGEMENT DOC CONTROL NAME CHANGES ETC	 [Y]
11	Does the plan set out the systems and equipment covered by the plan?		[Y]
12	Does the plan set out policy on storage of chemicals? (e.g. bunding, spill pallets, maintenance programmes, signage)		[Y]
13	Does the plan set out policy on delivery and unloading procedures? (e.g. site procedures)		[Y]
14	Does the plan set out policy on chemical hazard information being available close to the storage location?		[Y]
15	What method will the first reporter use to communicate an incident?	VERBAL TO SWITCH/ MOBILES	

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

16	Does the plan detail how the incident will be assessed as being significant or not? (e.g. chemical register, flow charts etc)		[Y]
17	Does the plan allow for the incident controller to record his assessment in order to prove due diligence? (e.g. IC flow chart)		[Y]
18	Does the plan allow for a 24 hour emergency supply provision of equipment?		[Y]
19	Does the plan detail safe evacuation routes for personnel for the IC to use?		[Y]
20	Does the plan detail a general summary of the expectations of the PIC (person in charge)?		[Y]
21	Does the plan detail actions to be taken in the event of releases of liquids that result in vapour or gases?		[N]
22	Does the plan detail the training requirements of staff at their various response levels? (e.g. IC training, spill responder, management)		[Y]
23	Does the plan include a Due Diligence Portfolio?		[Y]
	Notes		
DEST TOP : PHASE 2 - SPILL PLAN SPECIFICS			
24	Is the Site Emergency Management Team listed and current?		[N]
25	When was the last time that this team met to review the plan?	MARCH 2010	
		Evidence of Meeting Minutes seen?	[Y]
26	Is the Incident Controller Register listed and current?		[N]
		Seen and Tested?	[A]
27	Are the Local Government and Emergency Contact Lists current?		[N]
28	Can the client prove the decision tree that decides when these would be informed?		[A]
	Is there sufficient evidence to prove Due Diligence?		[A]
29	Is the 24 hour Emergency Back-Up for sub contractors detailed?		[N]
30	Does the plan include up-to-date and adequate drain maps?		[Y]
31	Does the scope of the site require sectoring?		[N]
32	Has the client identified critical risk cells?		[Y]
33	Are there any specific method statements for dealing with them?		[Y]
34	Is there a Spill Inventory Register?		[Y]
35	Who manages and maintains the Register?	ENVIRONMETAL COMMITTEE	[Y]
		Opportunity for SIMS?	[N/A]
		Proof of maintenance programme?	[Y]
36	How are emergency response products purchased?	FACTORY STORE	
		Department Heads?	[Y]
		Co-ordinated?	[Y]
		Unco-ordinated?	[N]

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

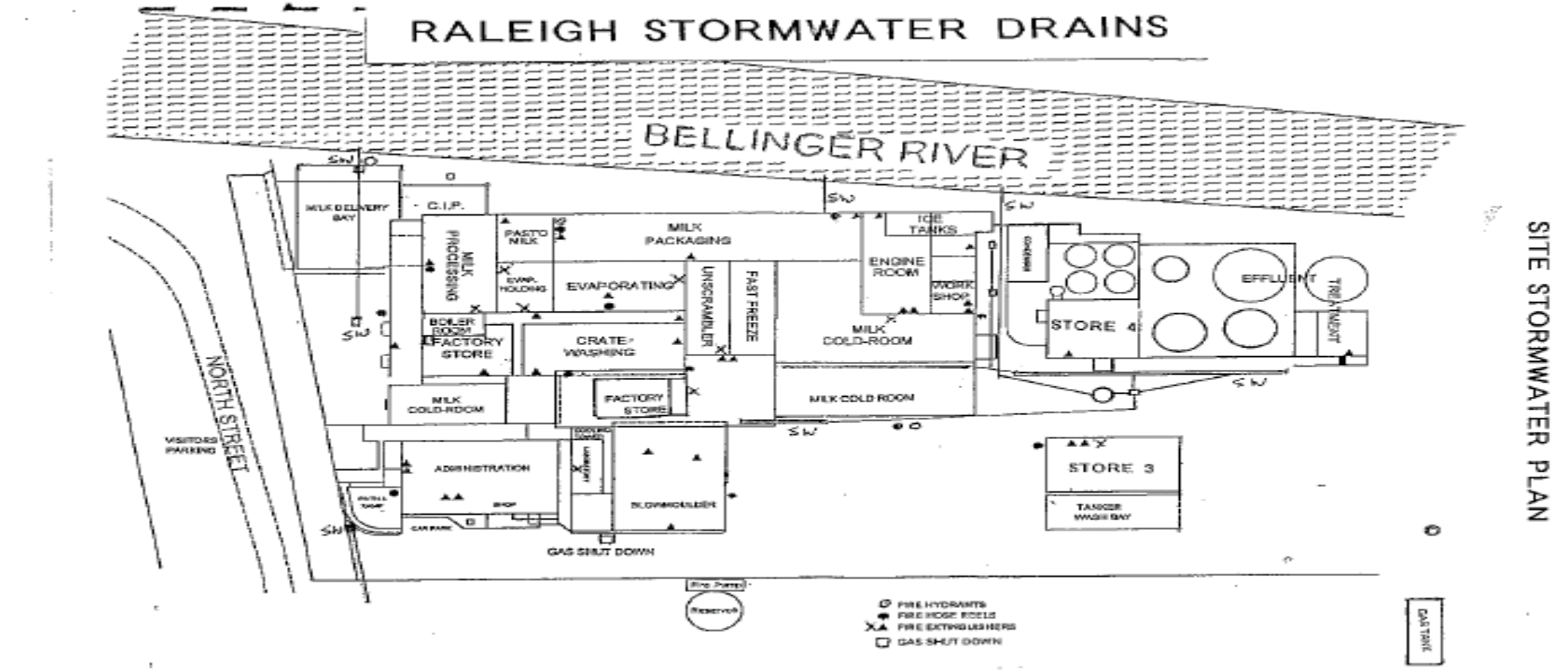
37	Is there an agreed specification for spill inventory?		[Y]
38	Is there a map which details location of inventory?		[Y]
39	Is there a PPE Inventory Register for Spill Response?		[N]
40	If yes, is there a register of personnel trained in its use?		[N]
41	Is there a policy to define the minimum response levels for chemicals?		[N]
		Significant Insignificant	[N]
42	Who manages and maintains the PPE Register? SAFETY COMMITTEE	CO-ORDINATORS	[Y]
		Proof of maintenance programme?	[Y]
43	How is emergency PPE purchased?	FACTORY STORE	
		Department Heads?	[Y]
		Co-ordinated?	[Y]
		Unco-ordinated?	[N]
44	Is there a register of personnel trained in the use of all PPE on site?		[Y]
45	Are the Action Plan Flow Charts specific and allow Due Diligence recording?		[N]
DESK TOP : PHASE 3 - PLANS & POLICIES			
47	What is the drain marking procedure?		
		Surface	[Y]
		Waste (Brown)	[N]
	ONLY STORMWATER DRAINS MARKED, ALL OTHER DRAINS ARE WASTE	Process	[N]
		Manholes	[N]
		Direction of Flow	[N]
		Additional Signage	[N]
48	What is the current status of drain marking? (e.g. clarity, wear and tear, signage)	REQUIRES IMPROVEMENT	[A]
49	What drain isolation controls are available? EMERGENCY SPILL EQUIPMENT,	BUNDING, DIVERSION	
50	Who would implement them?	STAFF IN AREA	
51	Does the car park include pollution control measures? (e.g. interceptor, spill kit)		[N]
52	How are yard areas protected from spill emissions?	DRAINED TO HUMECEPTOR	
53	Are there dedicated loading and unloading areas to protect surface drains?		[N]
54	Does any detergent enter surface drains?		[Y]
55	Do we have a Tank Register? (e.g. liquid, volume, tank location etc.)		[Y]
56	Can we complete a Tank Register today?		[NA]
57	What is the client's view on the level of environment awareness on site?	REQUIRES MORE TRAINING	[7/10]

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

58	What is the client's view on the level of Health & Safety awareness on site?		[8 /10]
59	Detail local neighbours		
	North Boundary :	VACANT FARMLAND	
	South Boundary :	ROAD	
	West Boundary :	BELLINGER RIVER	
	East Boundary :	2 RESIDENTIAL HOMES	
60	What Spill Training has been done?	NONE RECORDED	
		Employee awareness?	[N]
		How TRAINING BY SUPPLIERS	
61	Training Certificates and Registers available?	CHEMICAL ONLY	[N]
62	List previous spills or Health & Safety incidents of note	Date: 26/05/2005	
		Type: AMMONIA Brief Description: Engine room to Coolroom. Staff evacuation	
63	Does the client have an Environmental Effects Register?		[N]
64	Inspected and relevant information recorded?		[N]
65	What is the client's view of the most hazardous action on site?	FIRE – MAJOR EVACUATION	
66	What is the client's view of the most hazardous chemical on site?	SULPHURIC ACID HEALTH HAZARD	
67	Are there specific statements and policies in place to reduce this risk?		[Y]
68	Are there any off-site activities by the client that need further surveys?		[N]
	(If yes, please give brief details)		
69	How does the company maintain their existing discharge points for pollution?	LICENCE TO DECCAS	
		ANNUAL REVIEW	
70	What policies exist for waste storage on site?	NONE	
		Bunded Areas?	[Y]
		Segregated Skips?	[Y]
		Recycling?	[Y]
		Covers?	[Y]
		Signage?	[Y]
71	Is there any contaminated land on site?		[N]

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 7 STORMWATER SITE PLAN



POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 8 STORAGE TANK REGISTER

NORCO MILK RALEIGH STORAGE TANK REGISTER 31/03/2009

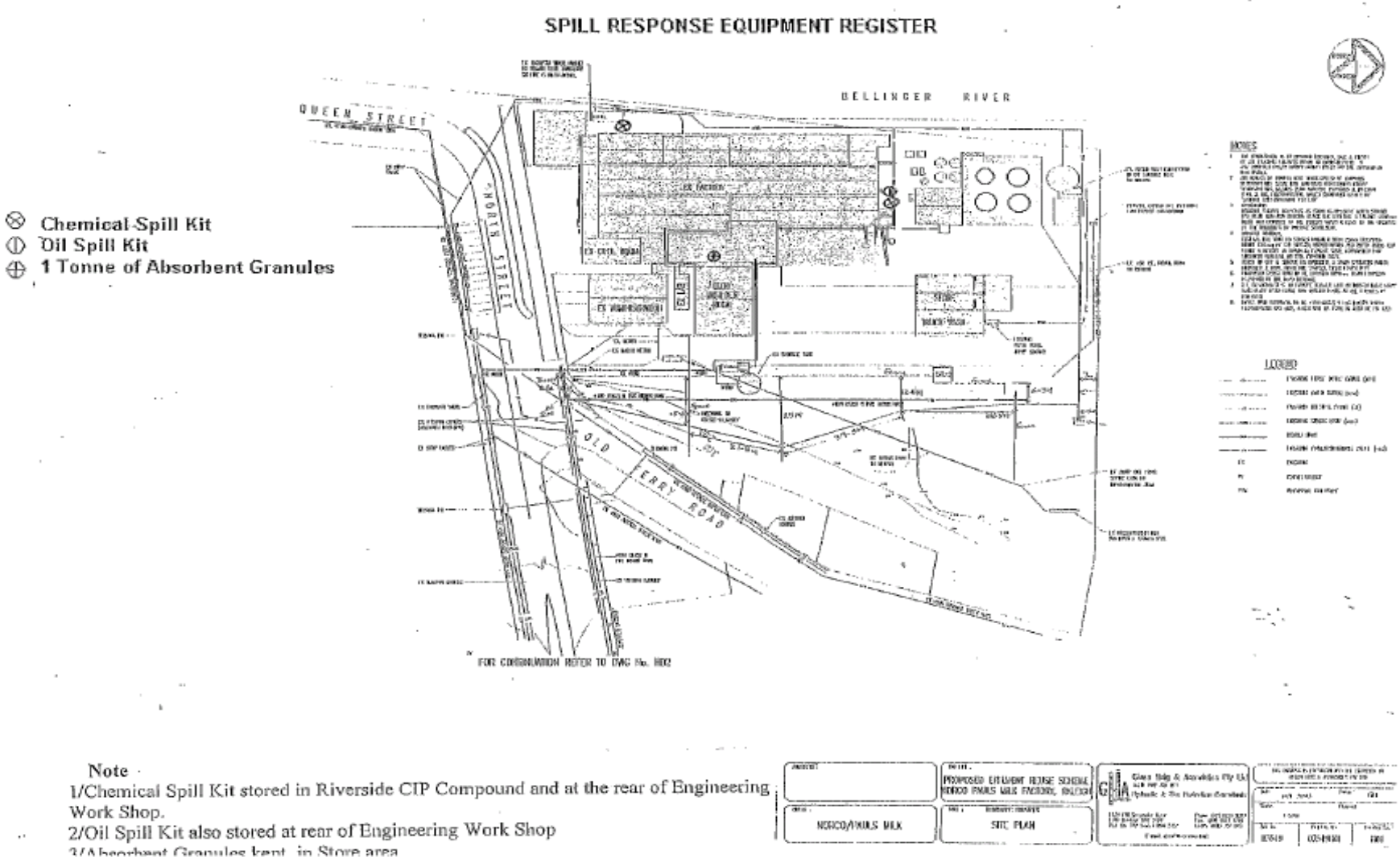
TANK No	LOCATION	PRODUCT	VOLUME	Overhead Gearbox
TK 100	MILK RECEIVAL	RAW MILK	65,000 LITRES	
TK 200	MILK RECEIVAL	RAW MILK	45,000 LITRES	YES
TK 300	MILK RECEIVAL	RAW MILK	31,000 LITRES	
TK 400	MILK RECEIVAL	RAW MILK	41,000 LITRES	
TK550	MILK RECEIVAL	SKIM MILK	60,000 LITRES	
VAT 500	PASTEURISER FLOOR	MILK CONCENTRATE	3,000 LITRES	
VAT 600	PASTEURISER FLOOR	FLAVOURS	4,5000 LITRES	YES
VAT 700	PASTEURISER FLOOR	FLAVOURS	1,300 LITRES	YES
VAT 800	PASTEURISER FLOOR	CUSTARD	1800 LITRES	YES
VAT 900	PASTEURISER FLOOR	FLAVOURS	2800 LITRES	YES
VAT 1000	PASTEURISER FLOOR	FLAVOURS	1800 LITRES	YES
VAT 1100	PASTEURISER FLOOR	CREAM	13,500 LITRES	
VAT 1200	PASTEURISER FLOOR	CUSTARD	2,200 LITRES	YES
VAT 1300	PASTEURISER FLOOR	CUSTARD	2,200 LITRES	YES
VAT 1400	PASTEURISER FLOOR	FLAVOURS	2,300 LITRES	YES
VAT 2000	VAT MEZZANINE FLOOR	CREAM	4,500 LITRES	YES
VAT 2100	VAT MEZZANINE FLOOR	CUSTARD	4,500 LITRES	YES
VAT 2200	VAT MEZZANINE FLOOR	CUSTARD	7,000 LITRES	YES
VAT 2300	VAT MEZZANINE FLOOR	FLAVOURS	4,000 LITRES	YES
VAT 2400	VAT MEZZANINE FLOOR	FLAVOURS	4,000 LITRES	YES
VAT 2500	VAT MEZZANINE FLOOR	FLAVOURS	4,000 LITRES	YES
VAT 2600	VAT MEZZANINE FLOOR	FLAVOURS	1,500 LITRES	YES
VAT 2700	VAT MEZZANINE FLOOR	WHITE MILK	25,000 LITRES	
VAT 2800	VAT MEZZANINE FLOOR	WHITE MILK	18,000 LITRES	
VAT2900	MILK RECEIVAL	WHITE MILK	65,000 LITRES	
VAT3000	MILK RECEIVAL	WHITE MILK	65,000 LITRES	
VAT 6	PASTEURISER MEZZ FLOOR	MILK	13,500 LITRES	YES
VAT 7	PASTEURISER MEZZ FLOOR	MILK	13,500 LITRES	YES
VAT 8	PASTEURISER MEZZ FLOOR	MILK	13,500 LITRES	YES
VAT 9	PASTEURISER MEZZ FLOOR	MILK	7,000 LITRES	YES
VAT 19	MILK RECEIVAL	MILK CONCENTRATE	7,000 LITRES	YES
VAT 20	MILK RECEIVAL	ORGANIC MILK	13,500 LITRES	YES
VAT 21	MILK RECEIVAL	ORGANIC MILK	33,000 LITRES	YES
VAT 31	EVAPORATOR ROOM	WASTE MILK	13,500 LITRES	YES
VAT 32	EVAPORATOR ROOM	MILK CONCENTRATE	13,500 LITRES	YES
VAT 33	EVAPORATOR ROOM	MILK CONCENTRATE	13,500 LITRES	YES
VAT 34	EVAPORATOR ROOM	WASTE MILK	13,500 LITRES	YES
RAW CAUSTIC	CIP COMPUND	CAUSTIC SOLUTION	7,000 LITRES	
RAW ACID	CIP COMPUND	ACIDIC SOLUTION	2,500 LITRES	
RAW RINSE	CIP COMPUND	WASH RINSE WATER	2,500 LITRES	
PACKHALL CAUSTIC	CIP COMPUND	CAUSTIC SOLUTION	2,500 LITRES	
PACKHALL ACID	CIP COMPUND	ACIDIC SOLUTION	2,500 LITRES	
PACKHALL RINSE	CIP COMPUND	WASH RINSE WATER	6,000 LITRES	
TOWN WATER	CIP COMPUND	TOWN WATER	4,500 LITRES	
PASTEURISED WATER	CIP COMPUND	TOWN WATER	7,000 LITRES	
HOT WATER	CIP COMPUND	TOWN WATER	7,000 LITRES	
FIRE WATER TANK	EASTERN BOUNDARY	TOWN WATER	45,000 LITRES	
BOILER FEEDWATER	BOILER ROOM	DOSED WATER	500 LITRES	

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

TANK No	LOCATION	PRODUCT	VOLUME	Overhead Gearbox
IAF 1	PRIMARY TREATMENT	WASTE WATER	8,000 LITRES	
IAF 2	PRIMARY TREATMENT	WASTE WATER	8,000 LITRES	
IAF 3	PRIMARY TREATMENT	WASTE WATER	8,000 LITRES	
IAF 4	BIO TANK BUND RAIN TANK	RAIN WATER	8,000 LITRES	
IRRIGATION 3	IAF BUNDED AREA	RECLAIMED WATER	44,000 LITRES	
IRRIGATION 4	IAF BUNDED AREA	RECLAIMED WATER	250,000 LITRES	
IRRIGATION 5	IAF BUNDED AREA	RECLAIMED WATER	250,000 LITRES	
BIO TANK	IAF BUNDED AREA	WASTE WATER	350,000 LITRES	
EFFLUENT TANK	IAF BUNDED AREA	WASTE WATER	225,000 LITRES	
BUTANE TANK	GAS STORAGE AREA	BUTANE	62,000 LITRES	
PROPANE TANK	IAF AREA	LPG	300 LITRES	
ACCUMULATOR	ENGINE ROOM	AMMONIA	1,000 LITRES	
LIQUID TANK	WORKSHOP	AMMONIA	300 LITRES	

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 9 SPILL RESPONSE EQUIPMENT REGISTER



POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 10 SPILL RESPONSE EQUIPMENT SELECTION GUIDE

Spill Response Equipment Selection Guide

Use this simple guide to help determine what types of Spill Response Products you need!

1. What types of liquids do you use that might be spilt?

I Use	You Need
Hydrocarbons only (oils, diesel, fuel etc)	General purpose or Oil/Fuel if near water
Hazardous Chemicals	Hazchem Kit
Non-hazardous water based chemicals (including paint, pesticides etc)	General Purpose Kit

2. What is the largest likely spill that might occur?

This is usually derived from the largest volume of liquid that is stored. Your closest spill kit should be at least the capacity of this volume

Spill Volume	You Need
1000 litre Intermediate Bulk Container (IBC)	1000 Litre Kit or 4 x 240 litre Kits
205 litre drum	240 litre Kit
20 – 60 litres drums	120 litre Kit

3. On what surface will the spill occur?

My Surface	You Need
Dirt	Loose absorbents
Water	Hydrocarbon only absorbents (if spill is a hydrocarbon)
Bitumen	Loose absorbent
Concrete	Pads or Loose absorbents

4. Apply preventative measures!
An absorbent roll or a Spill Safe Mat can be used on any porous/loose surface to absorb a potential spill that you think might happen before it does.

5. What other types of spill response equipment are needed?
Where is the liquid stored?

It's Stored In	You Need
In a bund	You need a bund filter.
Near a drain	A drain seal should be located close by. You may require permanent or temporary secondary containment device.
Inside a building	A Dangerous Goods Storage Cabinet would be appropriate or even necessary.

6. How many Kits are needed?
Where on your site is a spill likely to take place and if you had a kit, how far would a person need to go to retrieve it?

If a spill is more than 25 metres away, then your ability to respond to a spill quickly and successfully contain is greatly reduced. If you have a large site, the Kits should be no more than 30-40 metres apart.

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 11 SPILL CONTINGENCY PLAN DFRA-SOP-065

Item	Potential Environmental Hazard	Likelihood of Occurrence Each Year	Immediate Action Taken	Consequences of Hazard	Further Corrective Action
1	**Power Loss - No Warning**				
1b	Milk Processing Plant - product spoilage	5	When power is available, processing plant is washed, sanitised and product reprocessed.	Specification failure on finished product	Make necessary adjustments
2	**Product or Chemical Spill**				
2a	Silo Overflow	0-1	Hosed down drain to IAF plant averaging tank. Inform IAF plant operator and Supervisor. Isolate and redirect to spill tank.	Treated through IAF plant.	Investigate failure of system and action to prevent reoccurrence. Retreat if necessary.
2b	Silo Door Failure & Leakage	1	Contain and redirect to evaporator floor and dump to pig vat. Close storm water valve and pump to spill tank.	Drainage to stormwater and then to Bellinger River.	Replace door rubber and adjust.
2c	Tanker Overflow	1	Hose down drain to IAF plant averaging tank. Isolate and redirect to spill tank.	Treated through IAF plant.	Operators now have remote switches to deactivate pumps at high level alarm. Retreat if necessary.
2d	Vat Overflow	0-1	Hosed down drain to IAF plant averaging tank. Isolate and redirect to spill tank.	Treated through IAF plant.	Investigate operation of vat control system to find fault and action to prevent reoccurrence. Retreat if necessary.
2e	Internal Chemical Spill	0-1	Hosed down drain to IAF plant averaging tank. Isolate and redirect to spill tank.	Treated through IAF plant and neutralised as necessary.	Notify effluent plant operator of possible change in effluent. Retreat if necessary.
2f	External Chemical Spill (outside bunded areas)	0-1	Nearby drains isolated and spill cleaned up using 'chemical spill kit'. Close drain valve to river until spill cleaned up. Isolate and redirect to spill tank.	Drainage to stormwater and then to the Bellinger River.	Put reclaimed chemical back through treatment plant unless too large. If too large contact chemical response unit from local Fire brigade
2g	Liquid spill resulting In release of vapor or gas eg Ammonia	<0.1	Completely isolate area with demarcation plastic ribbon. If necessary evacuate area and in case of a major spill notify authorities	Difficulty breathing for personnel and contamination of IAF Bio Tank. Complete evacuation of factory or immediate area.	Allow vapor to disperse. Correct fault causing spillage. Isolate contaminated waste water and retreat if necessary. Complete form No DFRA-FOR-141

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

Item	Potential Environmental Hazard	Likelihood of Occurrence Each Year	Immediate Action Taken	Consequences of Hazard	Further Corrective Action
3	**IAF Plant**				
3a	Crack in biological treatment tank	<0-1	Start pump in bunded area to divert waste water to tanks 1+2 to IAF holding tank no7 .Recirculate until level in Bio Tank No6 can be lowered.	Untreated effluent draining into the river	Fix crack in tank. Store in irrigation tanks.
3b	High treated effluent BOD	<10%	To trace source of problem and implement corrective action where possible.	Higher than acceptable licence condition.	Circulate back through Biological Treatment plant and reprocess
3c	AIF Plant Breakdown	3	Spare pumps are available for immediate replacement. Supervisor / Management to assess situation and stop production if necessary.	Waste water treatment will normally have to cease while pump is being replaced, but not always.	There is sufficient extra holding capacity in the tank to prevent an overflow. If approaching an overflow, production within factory would cease.
3d	IAF Tank No 7 overflow	<0-1	This area is bunded with no access to stormwater drains. Spilled waste water pumped back into averaging tank (when lowered) or cleaned up by contractor. Sawdust heaped onto spilled area to soak up moisture. Stop production until problem fixed	Possible spill or seepage to Bellinger River.	Investigation of why high level alarm being monitored by Security Service did not alert staff to problem before tank overflowed.
3e	Raw Waste water contamination with ammonia or glycol	<1	Block drains to Waste Water pit. Waste Water recovered by contractor. Isolate and redirect to spill tank. Supervisor / Management to assess situation and stop production if necessary.	Decreases effectiveness of AIF plant and consequently increase BOD of treated effluent.	Education of maintenance crew and operators as to the influence of ammonia and glycol on the chemistry of the AIF plant. Retreat through IAF plant.
3f	Overflow waste sump or pit	<0-1	Stop further leakage and contain any overflow. Notify Supervisor / Management assess situation to determine any further actions.	Untreated effluent draining into the river	Identify cause and rectify.

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

Item	Potential Environmental Hazard	Likelihood of Occurrence Each Year	Immediate Action Taken	Consequences of Hazard	Further Corrective Action
4	**General**				
4a	Fire	0-1	Processes turned off, and services isolated as deemed necessary. Contact fire brigade	Vats of product spoilt or spilled and services leaked onto floor - catered for through IAF plant, waste vat and waste contractor if necessary.	On-going operator training and visits by Fire Brigade to ensure coordinated response to any emergency

Ammonia Leak

Vapour Density 0.6 vapour density	Will rise to atmosphere AFTER escaping the dense gas (which is buoyant and rides at ground level within the initial isolation zone); humidity, cool weather, low wind will slow the dispersion of the ammonia plume; buildings trees, and terrain will affect the vapour movement.	Move people out of the isolation zone and protective action zone by moving lateral and upwind, if movement requires entering > 220 to 300 PPM of ammonia vapour then consider shelter in place	Some concerns for animal life as for life safety for general public	Not a significant concern
Vapour Pressure 120 psia @70°F; Stored as a liquid under pressure	Pressure Increases incrementally with temperature **Temp F° / Temp C° / PSIG** -60 / -51 / 5.6 -28 / -33.3 / 14.7 32 / 0 / 48 60 / 15.6 / 92.9 80 / 26.7 / 138.3 120 / 48.9 / 221.7	Relief valves are set to release vapour when the pressure reaches the design set points for the tank protected against overpressure - downwind vapour spread may be discomforting based on dispersion/diffusion rate	Not a significant concern	Not a significant concern
Dispersion when released from a tank under pressure will form	Forms aerosol, dense gas, and then vapour; transitions from buoyant gas travelling at ground level until heated and released	Evacuation and personnel movement plans should consider the location and movement of the invisible	Same concerns for animal life as for life safety for general public	Same concerns for animal life as for life safety for general public.

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

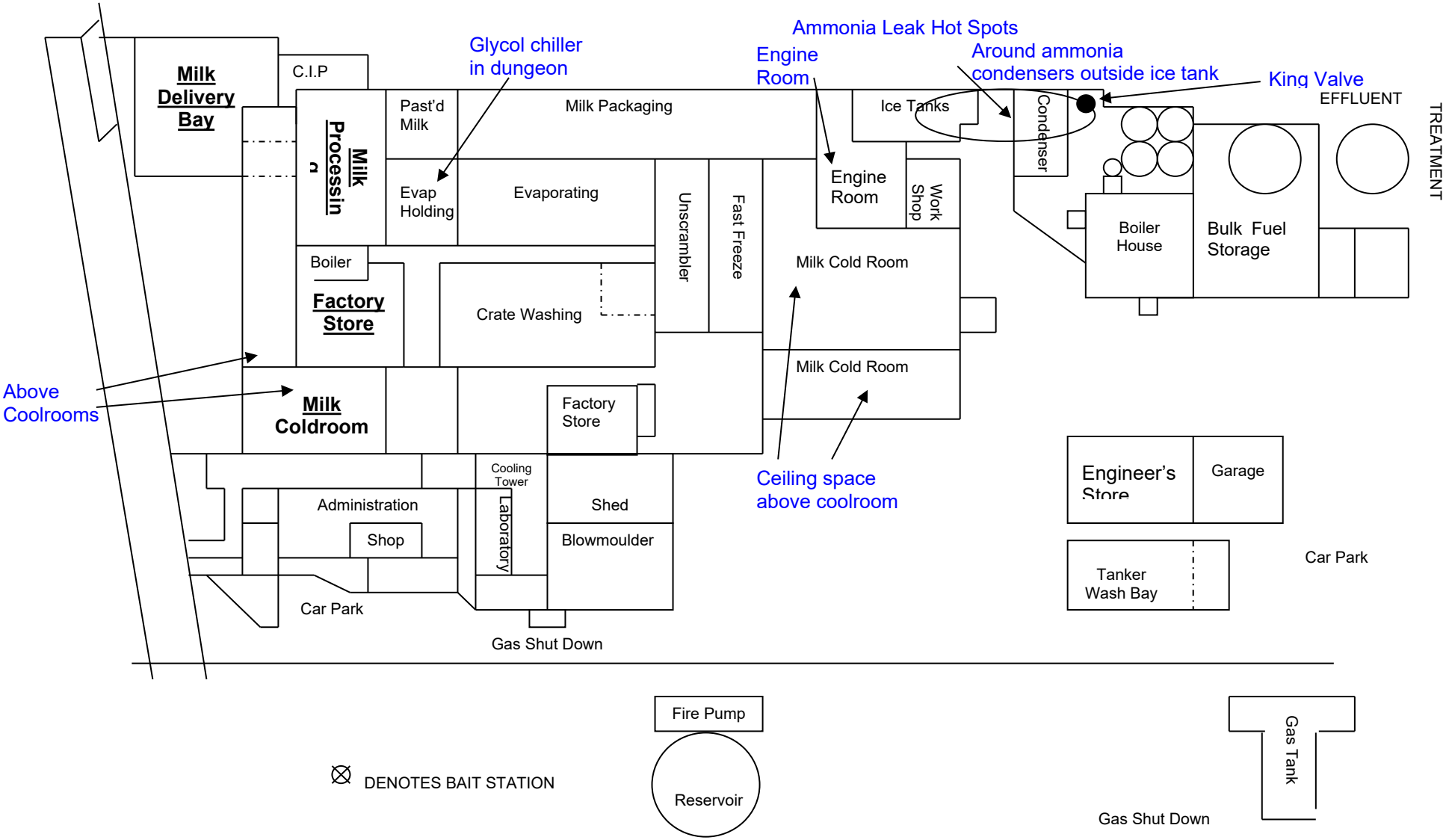
aerosol stream, dense gas cloud and then invisible vapour	to atmosphere; cold wind levels, and humidity slow the transition from ground level to atmosphere.	vapour; check status of release conditions, wind, and travel plume movement regularly when managing downwind life threat; NEVER enter a dense gas cloud when escaping an ammonia release.	

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

Hazard/Risk/Threat Assessment of Ammonia

	Life - Responders	Life - General Public	Environment	Product/Facility
Boiling Pt. -33°C/28°F; Dalton's law of partial pressures	Temperature within aerosol/dense gas may reduce to -60°C / -80°F; protect the SCBA regulator and wear proper gloves, boots, and PPE	Ammonia's pungent odour drives the general public away from the dense gas cloud before experiencing serious injury	Will freeze ground area and vegetation, especially when moisture is present	Will freeze product and equipment caught within the aerosol and dense gas cloud
Flammability 15%-28%; Warning at 40,000 PPM	Control sources of ignition; use caution when the release is contained in a room of area with sources of ignition greater than 1204 °F; ventilate and monitor before entry	Low risk of affecting the general public or works unless trapped or working near a dense gas cloud that flash burns	Not considered flammable in outside environments, the outer edges of the dense gas cloud may ignite but is hard to sustain; a sudden dense gas cloud exposed to a sources of ignition may flash	Same threat concerns as defined for responders and environment
Corrosiveness pH of 11.6; Forms a blue/green residue when exposed to brass, copper, zinc, gold, silver and alloys;	Mixes with sweat and body fluids causing irritation at 150-220 PPM and skin damage at 10,000 PPM; gloves, overalls, full face respirator for <300 PPM; chemical suit and SCBA >300 PPM; encapsulated suit for >5,000 to 10,000 PPM Metals that corrode will be weakened and may fail	Mild irritation may occur when exposed to vapour; decontaminate with water if skin irritation damages skin or eyes, otherwise decon with a fan and monitor for further reaction; liquid, aerosol or dense gas cloud exposure will require water decontamination	High pH solutions of aqua ammonia (especially 8 pH or higher) is toxic to biological life that depends on oxygen to breath; also can increase nitrate levels if solutions reach aquifer; Aqua ammonia formed within a tank (under pressure) may reach 13.6 pH	Plastic wrapped product is better protected from exposure to ammonia contamination; ventilate and remove highly contaminated product;
O_2 Deprivation 2,700 to 5,000 PPM	Asphyxiate when in dense gas form or when vapour levels are >2,700 PPM for 10 minutes exposed.	Coughing/eye irritation occurs well before asphyxiation; move lateral/upwind or shelter in place - never enter a dense gas cloud	Animal life will move away from an ammonia release; shelter in place within a barn or building to reduce exposure to vapours.	Not a significant concern

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN



POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 12 ENVIRONMENTAL INCIDENT NOTIFICATION FORM DFRA-FOR-141

Details of Incident

	Time	am/pm	Date
Time and Date of Incident Occurring:	.....	.....	.....
Time and Date of Incident Reported:	.....	.....	.....

Department: .....

Location: .....

Outcome of the Incident *(please select)*

☐ Contamination of Stormwater ☐ Air Pollution ☐ Environmental Nuisance (noise, dust, odour, etc.)

☐ Other .....

Details Of Incident *(please select)*

☐ Related to the Handling / Storage of hazardous Materials
☐ Related to the handling / Storage of Wastes
☐ Related to the handling / Storage of Product
☐ Related to Process Operations
☐ Other .....

Cause Of Incident *(please select)*

☐ Equipment Malfunction ☐ Operator Error

Describe in Detail How the Incident Occurred:

.....

.....

.....

.....

.....

.....

.....

.....

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 13 ENVIRONMENTAL INCIDENT INVESTIGATION FORM DFRA-FOR-142

Investigation Analysis: (To be completed for all incidents that caused, or have the potential to cause environmental harm.)

What contributed to the incident?

.....

.....

.....

Why did this contribute to the incident?

.....

.....

.....

How can recurrence be prevented?

.....

.....

.....

When will corrective action be completed?

Change to work environment .....
Change to work procedures .....
Equipment/machine modification .....
Training .....
Other .....

Comments: .....

.....

Investigation Coordinator/Manager Name: .....

Signature: .....

Management Review

Department Manager's Comments

.....

.....

Group Safety and Environmental Coordinators' Comments:

.....

.....

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 14 DANGEROUS GOODS LICENCE EXAMPLE

WorkCover NEW SOUTH WALES

35/000938
Licence Processing Unit
ph. (02) 4321 5500 fax (02) 9287 5500

Attn: NEIL HUDSON
NORCO CO-OPERATIVE LIMITED
1 NORTH ST
RALEIGH NSW 2454

3 November 2008

Dear Sir / Madam

RE: Notification of Dangerous Goods on Premises 35/000938
PREMISES: 1 NORTH ST, RALEIGH 2454

Please find enclosed your *Acknowledgement of Notification* that relates to the storage and handling of dangerous goods at the above premises. Only storage locations on this site that are above placarding quantity are recorded on this *Acknowledgement of Notification*.

Occupiers of premises on which dangerous goods are stored or handled in notifiable quantities are reminded that they must notify WorkCover NSW annually of the dangerous goods on those premises. WorkCover will send a reminder letter two months prior to the expiry of your current notification.

Please advise WorkCover within 14 days of any changes in your details including changes to the dangerous goods stored or handled, or if you no longer occupy the site.

Requirements relating to the storage and handling of dangerous goods on premises are contained in the Occupational Health and Safety Act 2000 and the Occupational Health and Safety Regulation 2001. To support this legislation WorkCover has developed the *Code of Practice: Storage and Handling of Dangerous Goods* document (catalogue No. 1354).

Further information on dangerous goods legislation and codes of practice may be obtained at the Workcover website www.workcover.nsw.gov.au or by calling WorkCover on 13 10 50.

Yours faithfully

Licence Assessment Officer,
Licence Processing Unit

WorkCover. **Watching out for you.**

WorkCover NSW ABN 77 682 742 966 92-100 Donnison Street Gosford NSW 2250 Locked Bag 2906 Lisarow NSW 2252
Telephone 02 4321 5000 Facsimile 02 4325 4145 WorkCover Assistance Service **13 10 50**
DX 731 Sydney Website **www.workcover.nsw.gov.au**

WC03116 0206

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

Dangerous Goods Notification Team
ph (02) 4321 5500 fax (02) 9287 5500

Occupier NORCO CO-OPERATIVE LIMITED
Attn: NEIL HUDSON
Licensee: ACN 009 717 417
NORCO FOODS
1 NORTH ST
RALEIGH NSW 2454

ACKNOWLEDGEMENT OF NOTIFICATION OF DANGEROUS GOODS ON PREMISES

ISSUED UNDER AND SUBJECT TO THE PROVISIONS OF
THE OCCUPATIONAL HEALTH & SAFETY ACT 2000 AND REGULATIONS THEREUNDER

Acknowledgement Number 35/000938 **Expiry Date** 19/12/2009

Occupier Contact NEIL HUDSON Ph. 6655 4211 Fax. 6655 4447

Premises where notified Dangerous Goods are stored / handled
NORCO CO-OPERATIVE LIMITED NORCO FOODS
1 NORTH ST RALEIGH 2454

Nature of Site DAIRY PRODUCT MANUFACTURING N.E.C.

Emergency Contact for this Site NEIL HUDSON Ph. 02 6655 1380

Site staffing 20 HRS 7 DAYS

Details of Storage Locations

Identifier.	Type	Goods Stored in Storage Location	Qty
1A	ROOFED STORE	Class 8	6000 L
	UN 1719 CAUSTIC ALKALI LIQUID, N.O.S.		3600 L
	UN 1760 CORROSIVE LIQUID, N.O.S.		400 L
	UN 1824 SODIUM HYDROXIDE SOLUTION		1000 L
1B	ROOFED STORE	Class 8	12000 L
	UN 1760 CORROSIVE LIQUID, N.O.S.		1000 L
	UN 2031 NITRIC ACID		1000 L
	UN 2582 FERRIC CHLORIDE SOLUTION		1000 L
	UN 2796 SULFURIC ACID		2000 L
2	ABOVE-GROUND TANK	Class 2.1	35500 L
	UN 1075 PETROLEUM GASES, LIQUEFIED		30000 L
4B	CYLINDER STORE	Class 2.3	800 L
	UN 1005 AMMONIA, ANHYDROUS		672 L
4C1	ROOFED STORE	Class 8	1000 L
	UN 1824 SODIUM HYDROXIDE SOLUTION		1000 L
4C2	ROOFED STORE	Class 8	1000 L
	UN 2582 FERRIC CHLORIDE SOLUTION		1000 L
4D	ROOFED STORE	Class 8	3000 L

This acknowledgment must be retained as PROOF OF NOTIFICATION.
You must notify WorkCover annually of the Dangerous Goods stored on these premises

WorkCover. **Watching out for you.**

WorkCover NSW ABN 77 682 742 966 92-100 Donnison Street Gosford NSW 2250 Locked Bag 2906 Lisarow NSW 2252
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W033115 0208

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

WorkCover NEW SOUTH WALES

Dangerous Goods Notification Team
ph (02) 4321 5500 **fax (02) 9287 5500**

	UN 1760 CORROSIVE LIQUID, N.O.S.		1000 L
	UN 1824 SODIUM HYDROXIDE SOLUTION		1000 L
	UN 2796 SULFURIC ACID		1000 L
6	**ROOFED STORE**	**Class 8**	**5000 L**
	UN 1719 CAUSTIC ALKALI LIQUID, N.O.S.		2400 L
	UN 1760 CORROSIVE LIQUID, N.O.S.		1000 L
	UN 2031 NITRIC ACID		1000 L

This acknowledgment must be retained as PROOF OF NOTIFICATION.
You must notify WorkCover annually of the Dangerous Goods stored on these premises

WorkCover. **Watching out for you.**

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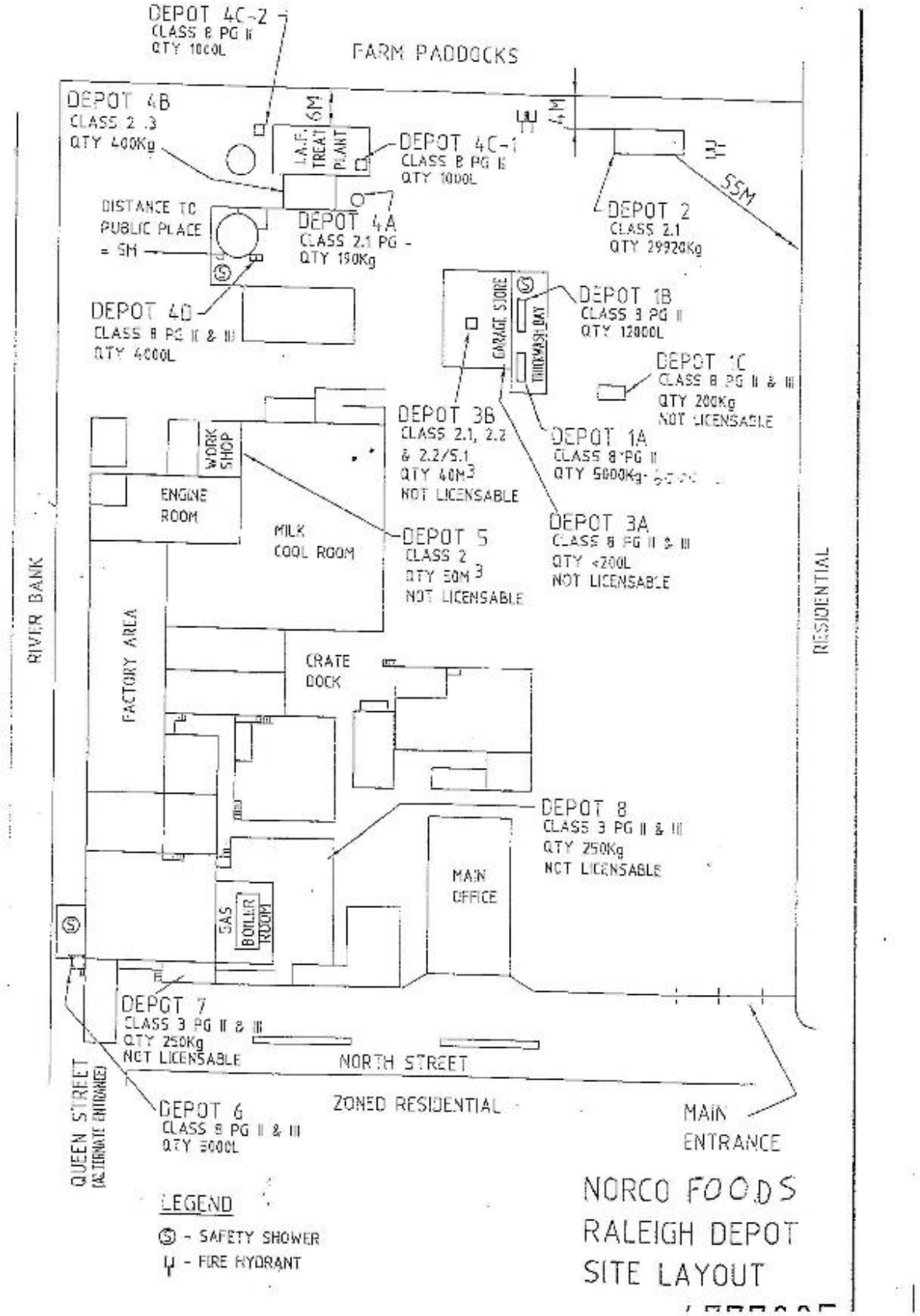
WC03116 0208

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN



POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

APPENDIX 15 ENVIRONMENTAL TRAINING REGISTER EXAMPLE

Environmental Training Plan
Refresher Training

Staff	Environmental Awareness	Date	Trainer	Staff	Environmental Awareness	Date	Trainer	Staff	Environmental Awareness	Date	Trainer	Staff	Environmental Awareness	Date	Trainer

POLLUTION INCIDENT MANAGEMENT RESPONSE PLAN

Staff	Environmental Awareness	Date	Trainer	Staff	Environmental Awareness	Date	Trainer	Staff	Environmental Awareness	Date	Trainer	Staff	Environmental Awareness	Date	Trainer