



MSM Milling
Manildra Stock Feeds
Manildra Packing

Pollution Incident Response Management
Plan

Approved	Anthony Ward (GM -Operations)	Approved	Peter Jones - CFO	Approved	Charlie Aldersey (GM – Commercial)
Doc Owner	Anthony Ward – GM - Operations	Eff Date	11Aug 2014	Rev. Date	26/1/19
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1.0 Introduction

MSM Milling, Manildra Packing and Manildra Stockfeeds, are all businesses that operate on the MSM Milling site at Lot 1, Dederang Street, Manildra. For the purposes of this PIRMP, all businesses will be referred to as MSM.

This document outlines the plan for responding to pollution incidents and references parts of the MSM Emergency Response Procedure where relevant. These are separate documents for use by MSM Milling employees.

- The Emergency Response Procedure provides the process for an initial response to emergencies such as fire, medical emergency, hazardous substance incidents / chemical spill, civil disturbance and blackout. The senior manager on site will act as warden and to control or limit the event, as well as moving people to safety where relevant.
- The Pollution Incident Response Management Plan provides instruction to site management about the process to be followed if there is a significant pollution event.

2.0 Notification and Response

a) Identification and escalation of issues

Employees are instructed to report any environment, safety or property incidents to their Team Leader or and to utilise pull flaps / break glass, to activate the emergency alarm when required.

Externally, there is a toll-free number for complaints. The number is 1800 750 034. This automatically generates an e-mail that is sent to a central address at MSM.

There are also automatic triggers for the initiation of the alarm process (fire detectors). The *Emergency Response Procedure* details the site alarm and evacuation processes. This includes audible alarms, deluge systems in key equipment, and provision of dedicated evacuation areas. Also included are processes such as conducting roll calls to account for personnel, search processes and facilitating interaction with emergency services departments.

If an environmental incident occurs that is a potentially notifiable pollution event it is escalated to the GM – Operations, or in his absence, GM - Commercial. The GM – Operations consults any relevant site staff to assess if a notifiable pollution incident has occurred. A notifiable event is described in Procedure 09-020 “*External Notification of Environmental Harm.*”

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The following key personnel need to be informed as soon as practicable:

Name	Position	Mobile Number
Anthony Ward	General Manager – Operations	0438 885 194
Charles Aldersey	General Manager – Commercial	0419 156 790
Damien Ivers	Production Manager	0428 240 212
Kaushal Pathirana	Technical Manager	0437 201 008
Aaron Huppatz	Maintenance Manager	0427 645 486

It is the responsibility of the GM Operations to inform the Business Directors at a practical time.

b) External Notification

The emergency process includes an alarm system. It encompasses an audible alarm / PA notification system.

If it is determined that a notifiable environmental incident has occurred, the GM - Operations will immediately notify the Environment Protection Authority and any other relevant parties.

The 24 hour Hotline number for the EPA is: 131 555.
 The number for the local EPA office is: 02 6332 7600.

c) Relevant Information to be given.

1. The relevant information about a pollution incident required under section 148 of the environmental protection act 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),
 - e. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
 - f. Other information prescribed by the regulations.
2. The person notifying will give the relevant information only if it is known at the time.
3. If the information required is not known to the notifier when the initial notification is made but becomes known afterwards, that information must be updated immediately after it becomes known.

The notification of the neighbouring premises will be determined by the GM - Operations if it will affect these neighbours.

A full list of relevant neighbours is held in Appendix: A.

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In the event of a release to waterway, the most appropriate contact has been identified as the local Council authority.

Cabonne Council contact number is 02 6368 2104.

Other Authorities that may be relevant are Workcover on 131 050.

d) Contact persons

- There is 24 hour site contact available through the Control room / administration office.
- The contact number is 02 63 645 999.
- Contact during initial stages of any emergency / crisis can be directed to this number.

The Team Leader on site will co-ordinate their activities with emergency services during initial stages of an emergency. The GM - Operations, or senior manager in his absence, will ensure that resources and personnel are allocated to any event.

A written controlled copy of this plan can be found in the Emergency response kit mounted on the front wall of the office next to the fire indication panel.

3.0 Licenced Activities

The purpose of this section is to provide an overview of key hazards associated with the licenced activities undertaken at the site. The activities licenced with the EPA are:

- Agricultural Processing
- General Agricultural Processing.

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4.0 Overview of Hazards

1. Below is outlined the potential items of hazard and the potential risks.

	Item	Health Hazards (Note 1)	Environmental Hazards
1	Canola Oil	Not classified as hazardous	Could pollute surface waters if spills are not contained
2	32% Caustic Soda	R35: Causes severe burns R41: Risk of severe damage to eyes	Material is alkaline and may raise the pH of surface waters
3	85% Phosphoric Acid	R34: Causes burns R41: Risk of severe damage to eyes	Material is acidic and may lower the pH of surface waters
4	Propane	R12 : Extremely flammable	None identified
5	Butane	R12 : Extremely flammable	None identified
6	Canola Seed	Not classified as hazardous	Organic seed – none identified
7	Canola Meal	Not classified as hazardous	Organic material – none identified
8	Magnesium Oxide	Not classified as Hazardous	None Identified
9	Flossy Fine Salt	Not classified as Hazardous	None Identified
10	Sodium Bicarbonate	Not classified as Hazardous	Unlikely to adversely affect the environment
11	Calcium Propionate “Kemira”	Not classified as Hazardous	None Identified
12	Lime	Not classified as hazardous	Non Identified
13	DDG - Syrup	Not classified as hazardous	No Environmental effect
14	LacGro Gold Premix	R36: Irritating to eyes	Material is slightly acidic and may lower pH of surface waters.
15	Salcurb RM	Acute Toxicity: Cat 3 Carcinogenic: Cat 1 R36: Irritating to eyes Sensitization -Skin Category 1	Material is acidic and may lower the pH of surface waters

Note 1: As defined in Appendix 1 of the NATIONAL CODE OF PRACTICE FOR THE LABELLING OF WORKPLACE SUBSTANCES [NOHSC: 2012(1994)]

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2. Below is outlined an inventory of potential pollutants at the premises, the quantity of each potential pollutant, the location of each potential pollutant and the control measures used to minimise the risk to human health and the environment. As well as containing or controlling the impacts of a pollution incident.

	Item	Maximum Quantity	Location	Control Measures
1	Canola Oil	2300 tonnes	Tank Farm	Tank Farm Bund
2	Canola Oil	20 tonnes	In process in the Refinery	Building Bunding
3	32% Caustic Soda	1500 litres	Refinery	Has bund Pallet in building bund
4	32% Caustic Soda	10,000 Litres	Material Store – Shed	Specialised approved banded storage container.
5	85% Phosphoric Acid	1500 litres	Refinery	Has bund Pallet in building bund
6	85% Phosphoric Acid	6000 Litres	Material Store - Shed	Specialised approved banded storage container.
7	Salcurb RM E	6,000 Litres	Material Store – Shed	Specialised approved banded storage container.
8	Salcurb RM E	1,000 Litres	Refinery	Specialised approved banded storage tray.
9	Propane	750 litres	Above ground tanks	Isolated location
10	Butane	59,000 litres	Above ground tank	Isolated location
11	Untreated/Treated waste water	40,000 litres	Tank Farm	Tank Farm has bund
12	Magnesium Oxide	3,000 Kilos	In Process in feed mill	Stored in process building
13	Flossy Fine Salt	3,000 Kilos	In process in feed mill	Stored in process building
14	Sodium Bicarbonate	3,000 Kilos	In process in feed mill	Stored in Process building
15	Calcium Propionate “Kemira”	3,000 Kilos	In process in the Feed Mill	Stored in Process Building
16	Lime	20,000 Kilos	In Process in the feed mill	Stored in bulk in process building
17	DDG - Syrup	20,000 Kilos	Tank Farm	Tank farm bund
18	LacGro Gold Premix	2,000 Kilos	In process in Feed mill	Stored in Process Building.

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3. The following information is the results of risk assessments prepared for each potential identifiable risk, the likelihood of impact and control actions for each risk.

MSM Risk Key:

- Almost certainly will occur:** Consequence expected to occur on a weekly basis or more frequently.
- Good chance it will occur:** Consequence expected to occur more than once in 3 months, but less than once a week.
- Likely to occur:** Consequence expected to occur more than once a year, but less than once in 3 months.
- Unlikely to occur:** Consequence expected to occur more than once in 3 years, but less than once a year
- Extremely unlikely to occur:** Consequence has not occurred and is expected to occur less once in 3 years.

Following is information about the potential significant hazards associated with the licenced activities:

Hazard: Poor local air amenity due to odour

Likelihood: Good chance it will occur

Control Actions: Daily reporting on Bio filter key control points, Thermal imaging of bio filter bed as required, active water management of bed, process air treatment equipment (cyclones, ducting of manufacturing process air to wet scrubbers and bio filter), preventative maintenance programs, wastewater treatment equipment and management procedures, staff inspections, reporting of complaints.

Other potential actions: not identified

Potential pollutant quantity: not readily quantified

Conditions / events that could increase likelihood: wastewater treatment disruption, degradation / composting of bio filter bed, extended shutdown of plant (in excess of 24 hours, affect biomass balance).

Hazard: Dust explosion from organic dust

Likelihood: Unlikely to occur

Control Actions: process air treatment equipment (cyclones, ducting of manufacturing process air to wet scrubbers and biofilter), preventative maintenance programs, smoking restrictions, cleaning programs, general awareness training, engineering controls of potential ignition sources, deluge systems, spark arresting systems, Explosion venting on high risk equipment, (i.e. dust collectors, cyclones)

Other potential actions: Not identified.

Potential pollutant quantity: not readily quantified.

Conditions / events that could increase likelihood: fire, internal process dust leaks, breach of smoking rules.

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Hazard: Poor local air quality from dust emissions

Likelihood: Unlikely to occur

Control Actions: process air treatment equipment (cyclones, ducting of manufacturing process air to wet scrubbers and biofilter), preventative maintenance programs.

Other potential actions: not identified

Potential pollutant quantity: not readily quantified.

Conditions / events that could increase likelihood: not identified

Hazard: Stormwater pollution from Canola Oil spill

Likelihood: Extremely unlikely to occur

Control Actions: Tanker truck Load/Unload area has bund and drain to tank farm, loading procedures, Tank storage has bund, Building has bund and drain to trade waste, Trade waste has bund, stormwater retention dam with baffle fitted, gross pollutant trap, spill control equipment (drain covers and absorbent), planned inspections, pit level switch alarms on SCADA and inspected, Preventative maintenance program.

Other potential actions: utilise waste contractor with vacuum tanker.

Conditions / events that could increase likelihood: excessive rain, fire, multiple tank failures.

Hazard: Canola Oil spill beyond boundary

Likelihood: Extremely unlikely to occur

Control Actions: Tanker truck Load/Unload area has bund and drain to tank farm, loading procedures, Tank storage has bund and security access walls to eliminate tampering, Building has bund and drain to trade waste, Trade waste has bund, stormwater retention dam with baffle fitted, gross pollutant trap, spill control equipment (drain covers and absorbent), planned inspections, pit level switch alarms on SCADA and inspected, Preventative maintenance program. CCTV monitoring.

Other potential actions: utilise waste contractor with vacuum tanker, recover contaminated material utilising civil contractors.

Conditions / events that could increase likelihood: excessive rain, fire, multiple tank failures, external tampering.

Hazard: Stormwater pollution from spill of raw wastewater

Likelihood: Extremely Unlikely to occur

Control Actions: Tanker truck Load/Unload area has bund and drain to tank farm, loading procedures, Tank storage has bund, Building has bund and drain to trade waste, Trade waste has bund, stormwater retention dam, spill control equipment (drain covers and absorbent), planned inspections, pit level switch alarms on SCADA, Preventative maintenance program.

Potential pollutant quantity: average generation of approximately 5-8KL per day

Other potential actions: utilise waste contractor with vacuum tanker.

Conditions / events that could increase likelihood: rain, fire, blackout

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Hazard: Stormwater pollution from discharge of poorly treated effluent.

Likelihood: Extremely Unlikely to occur

Control Actions: Treatment system has bund, wastewater treatment equipment and management procedures, staff inspections, preventative maintenance programs.

Other potential actions: Utilise waste contractor with vacuum tanker, cease wastewater generation.

Potential pollutant quantity: average generation of approximately 5 -8 KL per day.

Conditions / events that could increase likelihood: rain, fire.

5.0 Pollution response training, testing and updating of plan

The nature and objectives of training related to this plan is to provide understanding and competency with respect to preventing pollution events, reporting incidents, and responding to emergencies and crisis situations. The key elements that relate to the knowledge of pollution response are:

- An *induction program* that is in place for new employees, site visitors and contractors. These include instruction about environmental commitments, preventing pollution events and reporting of incidents. These are implemented as required. All employees undertake induction refresher training every twelve months to maintain a level of awareness of the emergency procedures.
- Training records are kept by the site Human Resource co-ordinator.
- Emergency management. The actions taken during an emergency assist the prevention of pollution incidents and control / reduce any potential pollution. The site process for emergency response is contained within the *Emergency response procedure*.
- PIRMP is part of MSM's controlled document system and is reviewed annually.

Test Records:

Date	Co-Ordinator	Nature of test/ updated
01/08/12	Greg Lynch	Review and test of procedure
12/08/14	Anthony Ward	Review of PIRMP including pellet mill
14/08/14	Anthony Ward	Complaint line tested based on odour complaint. No. 1800 750 034
09/10/15	Anthony Ward	Reviewed and updated
21/01/16	Anthony Ward	Hazards and remediation measures reviewed
4/7/16	Anthony Ward	Regulatory test – including complaint line
20/1/18	Anthony Ward	Review of PIRMP – for reissue
20/1/18	Anthony Ward	Regulatory test – Test Complaint line

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APPENDIX: A

Contact List:

Name	Position	Mobile Number
Anthony Ward	General Manager – Operations	0438 885 194
Charles Aldersey	General Manager – Commercial	0419 156 790
Damien Ivers	Production Manager	0428 240 212
Kaushal Pathirana	Technical Manager	0417 669 357
Aaron Huppertz	Maintenance Manager	0427 645 486

Contact List - Neighbours:

Name	Position	Mobile Number
DP Williamson	West Boundary – 20 Dederang Street	02 63 645 308
M. J. Bennett	West Boundary – Dederang Street	02 63 645 130
Manildra Group	West Boundary – 18 Dederang Street	02 63 645 003
G. Wood	South Boundary	02 63 645 363
G. Wood	South Boundary	0409 604 959
Grain Corp	North Boundary	02 63 645 363

DOCUMENT HISTORY

Ver	Date	Pages	Name	Title/Position	Reason
1.0	11/08/14	12	A. Ward	GM-Operations	Original
1.1	09/10/15	12	G. Lynch	Technical Advisor	Regulatory review
1.2	21/01/16	12	A.Ward	GM-Operations	Review of Potential Hazards
1.3	2/2/17	12	A.Ward	GM – Operations	Regulatory review – contact update
1.4	20/1/18	13	A. Ward	GM – Operations	Review and update of information.

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