ENVIRONMENTAL & POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Riverina (AUSTRALIA) Pty Ltd

1. PURPOSE

The purpose of this procedure is to ensure the Riverina (Australia) Pty Ltd comply with the requirements to prepare a Pollution Response Management Plan (PIRMP) under section 153A of the POEO Act 1997.

2. SCOPE

This procedure relates to Riverina (Australia) Pty Ltd Casino Mill at Lot 101, DP 860152, Reynolds Road, Casino, New South Wales.

3. INTRODUCTION

Site location marked in red on the map below; Reynolds Road, Casino, New South Wales.
Map 1;

Neighbouring Land Uses;
To the immediate South sale yards land and beyond is Boral,
To the West sale yards land,
To the North Council property, quarried and waste glass storage,
To the East (across Reynolds Road), Northern Co-Operative Meat Works farmland.
No residential properties in the immediate vicinity.

4. KEY ACTIVITIES & PROCESSES

Riverina (Australia) Pty Ltd (Riverina) supplies animal feed for the Australian agriculture industry and is also an exporter of grain and protein meals to South East Asia, the Pacific Rim and other export markets. Riverina's operations include procurement and trading of grain and agricultural commodities, milling of stockfeed, including beef and dairy cattle, birdseed mixes, pig feeds, poultry, sheep, goats, horse feeds and pasture supplements

5. POTENTIAL POLLUTION TYPES

The most likely environmental emergencies that may be encountered include:
Organic oil spill or molasses that reaches the stormwater system watercourse. The sources may include but are not limited to:

- IBCs containing liquid vegetable oil.
- Bulk oil unloading from road tanker

Gas leak and/or fire. The sources may include but are not limited to:

- LPG bulk tank,
- LPG tank for filling fork lift tanks,
- LPG fork lift fuel tanks.
- Oils and greases in the workshop
- Diesel Fuel Tank, fully self-contained

Air pollution from unusual particulate stack emission cause of which may include but are not limited to:

- Production trials.
- Dust produced when unloading grain trucks on the grain unloading pit.

Recycled Vegetable Oil: is delivered in bulk road and pumped into the RVO Tank, which is inside the liquid storage bund. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. Risk Level = 4

Molasses Liquid: is delivered in bulk road and pumped into the Molasses Tank, which is inside the liquid storage bund. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. Risk Level = 4

Waste Oil: All Waste Oil generated shall be stored in sealed black oil waste drums and stored adjacent to the large liquid bund. These drums are taken away by a contractor and the contents recycled off our premises. Risk Level = 2

Oil /Water Emulsions: These may develop inside the liquid bund if and when there is a leak of oil inside the confined space of the liquid bund. The Production Manager arranges for the contents of the bund be pumped out by a liquid waste disposal contractor. Risk Level = 4

Boiler Water: Boiler water waste is contained in the Boiler Blowdown Water. The Production Manager arranges for the contents of the bund to be pumped out by a liquid waste disposal contractor. Risk Level = 3

Septic Waste: The septic systems discharge the treated water through a watering system which waters the grass at the western side of the site. Risk Level = 2

Bulk Grain: Bulk grain if spilled is swept up by personnel and can be added back into the process if not contaminated with foreign material. Alternatively the waste is tipped into the bulk waste bins provided and serviced by a waste management company. Risk Level = 3

Raw Material: Bagged raw materials used on site if spilled are swept up by personnel and can be added back into the process if not contaminated with foreign material. Alternatively the waste is tipped into the bulk waste bins provided and serviced by a waste management company. Risk Level = 3

Hydrochloric Acid: Hydrochloric acid is utilised to control the pH of the water in the boiler blow down sump. This product is stored in a separate container or in the portable bund area. Maximum quantity stored on site is 2 x 20 litre drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. Risk Level = 4

Boiler water treatment chemical: Various boiler water treatment chemicals are used on site to control the level of total dissolved solids in the boiler water. These products are stored in 15 litre drums. These products are stored in the portable bund area. Maximum quantity stored on site is 10 x 15 litre drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. (Alpha 1, Kappa Silver, Transpol 392 and Omega Tan) Risk Level = 3

Insectaguard: Insectaguard is a pyrethrum and is used on site to treat flies and other insects. Insectaguard is in a 25 litre drum and is stored in the portable bund area. Maximum quantity stored on site is 1 x 25 litre drum. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. Risk Level = 2

Gear oil: Gear oil is used on site to lubricate the numerous gearboxes. The gear oil is in 20 litre drums and is stored in the portable bund area**.** Maximum quantity stored on site is 8 x 20kg drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. (Gulf Western Industrial gear oil 220) Risk Level = 4

Lubricant: Lubricant is used on site to lubricate various items of equipment. Lubricant is in 20 litre drums and is stored in the portable bund area. Maximum quantity stored on site is 2 x 20kg drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. Risk Level = 4

Bunded Diesel Storage: The site has a fully contained diesel bowser that is double skinned for spill containment. Risk Level = 1

Add Blue: The site holds an IBC of Add Blue (50% urea solution) for the control of truck exhaust emissions, this is contained within a second sea freight container. Risk Level = 3

Sanitiser: Sanitiser is used on site to spray into the cooling equipment for sanitation purposes. The sanitiser comes in 20 litre drums and is stored in the portable bund area. Maximum quantity stored on site is 2 x 20 litre drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. (Actisan Sanitiser) Risk Level = 3

Thinners: Thinners is used on site for cleaning some equipment in the workshop and when painting. The thinners come in 20 litre drums and are stored in the portable bund area.
Maximum quantity stored on site is 2x 20litre drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. (Recochem all-purpose thinner) Risk Level = 4

6. Risk Identification

a. Risk Assessment Process

The environmental risk assessment identifies aspects that may cause a risk of harm to the environment and assesses the level of impact. Environmental risk assessments are used for determining the significance of impacts on the environment. The process of risk assessment is explained below.

How likely is an event to occur?

Level	Descriptor	Description
5	Almost Certain	The event is expected to occur in most circumstances
4	Likely	The event will probably occur in most circumstances
3	Moderate	The event should occur at some time
2	Unlikely	The event could occur at some time
1	Rare	The event may occur only in exceptional circumstances

If it does, what are the worst-case scenario consequences?

Level	Descriptor	Description
1	Insignificant	Low financial loss, negligible if any environmental impact
2	Minor	On site release immediately contained, minor and reversible impact. Generation of waste. Normal resource consumption. Medium financial loss.
3	Moderate	On site release contained with outside assistance. Potential release to stormwater. Incident reported to authorities. Minor but reversible impact. Generation of waste requiring disposal as controlled wastes. Significant consumption of resources, e.g. gas, water, electricity and raw materials. High financial loss.
4	Major	Loss of production capability. Offsite release contained with outside assistance. Incident reported to authorities, major but reversible impact. Major financial loss.
5	Catastrophic	Toxic release off site with detrimental effect. Immediate involvement of authorities, major and irreversible impact. Huge financial loss.

Add the levels above to find risk level.

Level of Risk	Consequences				
	Insignificant	**Minor**	**Moderate**	**Major**	**Catastrophic**
Likelihood	**1**	**2**	**3**	**4**	**5**
5 (almost certain)	6	7	8	9	10
4 (likely)	5	6	7	8	9
3 (moderate)	4	5	6	7	8
2 (unlikely)	3	4	5	6	7
1 (rare)	2	3	4	5	6

Risk Prioritisation		
	RISK LEVEL	**SUGGESTED ACTIONS**
	Low Risk	Manage by Routine Procedures
	Moderate Risk	Responsibility and action dates must specified
	High Risk	Reduce as soon as possible
	Extreme Risk	Immediate action to Reduce the Risk

7. Management Procedure

The Branch Manager is responsible for notifying the authorities.

In the event of a major incident on site only the Managing Director or his delegate, shall be authorised to make any statements to the media or public.

8. Notification Procedure – Neighbours

The nature and direction of the incident will determine the most appropriate neighbours to be notified. In the event of a pollution incident the Branch Manager will be the person responsible for notifying any affected neighbours. In their absence the responsibility will site with the Production Manager.

9. Immediate Incident Response Procedure

Table 1; Notification Template for the Management Team

Site Management Team	Authorities to Notify of Pollution Incidents
Branch Manager	**Environmental Protection Authority (EPA)** Tel: (02) 6640 2500 Fax: (02) 6642 7743 Alternative Tel: 131 555 24 hrs
Workplace Systems Manager	**SafeWork NSW** Tel: 131 050
	Lismore Base Hospital Tel: (02) 6624 0200
Branch Manager	**Richmond Valley Council** Tel: (02) 6660 0300 24Hrs 7 Days/Week
Branch Manager (or in EMERGENCY, Production Manager or Shift Supervisor)	**Fire and Rescue NSW** **Emergency Tel: 000** Alternative Tel: 1300 729 579

Table 1 Supplemental for specific Incident types affecting neighbours;
Notification Template for the Management Team

Site Management Team	Neighbours to be notified
Branch Manager	**Northern Co-Operative Meat Company Ltd. (NCMC)** Tel: (02) 6662 2444
	Casino Saleyards Tel: (02) 6662 6403
	Boral Timber Tel: (02) 6670 8700
	Richmond Valley Council Tel: (02) 6660 0300 24Hrs 7 Days/Week

Table 2; Notification Template for the Site Employees

<table>
<tr><td>Safety First</td><td colspan="3">❖ Care of Workers – Evacuate the Area if there is any danger to personnel.
❖ Care of Environment – contain spills, put out fires ONLY if safe to do so.</td></tr>
<tr><td rowspan="3">Treatment</td><td colspan="3">Provide First Aid or Medical Treatment, if required</td></tr>
<tr><td>Ambulance</td><td>000</td><td></td></tr>
<tr><td>Lismore Base Hospital</td><td>(02) 6621 8000</td><td>Uralba St, Lismore NSW 2480</td></tr>
<tr><td>Minor Spills or Emissions</td><td colspan="3">❖ Stop the source of the spill if safe to do so.
❖ Contain the spill (Spill Kits) and control its flow from the site.
❖ If pollution has escaped the site or if the spill has potential to harm the environment, report the spill to Branch Manager, who will notify Managing Director, General Manager Feed Division and Workplace Systems Mangers.
❖ Be safe rather than sorry; report any pollution no matter how small to the Branch Manager.</td></tr>
<tr><td>Majors Spills or Emissions</td><td colspan="3">❖ For large scale hazardous spills call the NSW Fire and Rescue immediately on 000 (triple zero).
❖ Control pollution flow from leaving the site where possible.
❖ If pollution has escaped the site or if the spill has potential to harm the environment, report the spill to Branch Manager, who will notify Managing Director, General Manager Feed Division and Workplace Systems Mangers.
❖ Contact Grelie Waste who is able to pump liquid wastes into the liquid waste removal truck for disposal, Tel: (02) 6662 2510.
❖ Call key people listed below in order.</td></tr>
<tr><td rowspan="7">Notify Key People</td><td colspan="2">Managing Director</td><td>Mob: 0408 422 488</td></tr>
<tr><td colspan="2">General Manager Manufacturing Division</td><td>Mob: 0427 637 933</td></tr>
<tr><td colspan="2">Workplace Systems Manager</td><td>Mob: 0409 099 218</td></tr>
<tr><td colspan="2">Work Health and Safety Manager</td><td>Mob: 0428 756 824</td></tr>
<tr><td colspan="2">Human Resources Manager</td><td>Mob: 0409 306 765</td></tr>
<tr><td colspan="2">Branch Manager</td><td>Mob: 0437 496 032</td></tr>
<tr><td colspan="2">Production Manager</td><td>Mob: 0429 919 700</td></tr>
<tr><td>Media Relations</td><td colspan="3">In the event of a major incident on site only the Managing Director or his delegate, shall be authorised to make any statements to the media or public.</td></tr>
</table>

10. **Emergency Response Equipment**

The site maintains the following emergency equipment and has the ability to engage spill control assistance of Grelie Waste.

i. Liquid Spills can be absorbed by Bentonite (clay)
ii. Fire extinguishers
iii. Fire Hose Reels

11. **Incident Response Procedure**

A person has a duty to notify the Branch Manager and in their absence the Production Manager when – while carrying out any activity – the person becomes aware that an event has happened that causes or threatens to cause material environmental harm.

Emergency incidents such as those involving

a. The release of contaminants into the stormwater system.
b. Hazardous materials from fires.
c. Spillage of chemicals that require involvement of emergency response personnel.

Material Environmental Harm includes actual or potential harm to the health or safety of humans or the ecosystem.

12. **Plan Testing, review and Maintenance**

a) The PIRMP will be reviewed following a significant pollution incident covering deficiencies identified in the investigation.

13. **Approval & History**

Issue	Amended paragraphs/pages	Amendment Details	Date issued
1	New PIRMP	New PIRMP	04/07/2014
2	Approved by	Change to CEO	26/04/2016
3	Potential Pollution Types Immediate incident response Procedure	Additions to chemicals on site Added neighbours contact numbers	27/05/2016 27/05/2016
4	Contact details	Internal executive and senior management changes inclusive of phone contact details have changed	06/04/2018
5	Potential pollution types Potential pollution types Potential pollution types Notification template for site employees Notification template for site employees	Remove Alimet – no longer in use Remove poultry oil – no longer in use Remove Kappa 1 – no longer in use Update phone number for Boral Timber Update phone number for WHS Manager	24/05/19 24/05/19 24/05/19 24/05/19 24/05/19
6.	Sanitiser	Remove Quat – No longer used	19/06/2021
7.	Regional Manager	Change to Branch Manager	26/06/2021
8.	Potential pollution types	Change to Insectaguard. Pyrafog no longer used.	26/06/2021

9.	Potential pollution types	Change to Alpha 1. Change to Kappa Silver Change to Transpol 392 Change to Omega Tan	26/06/2021
10.	Potential pollution types added and renumbered to version 10	Addition of Diesel Storage and Add Blue to the site, validation of emergency contact numbers	10/06/2022

Approved by: _____ Director

Approved by: _____ Managing Director