

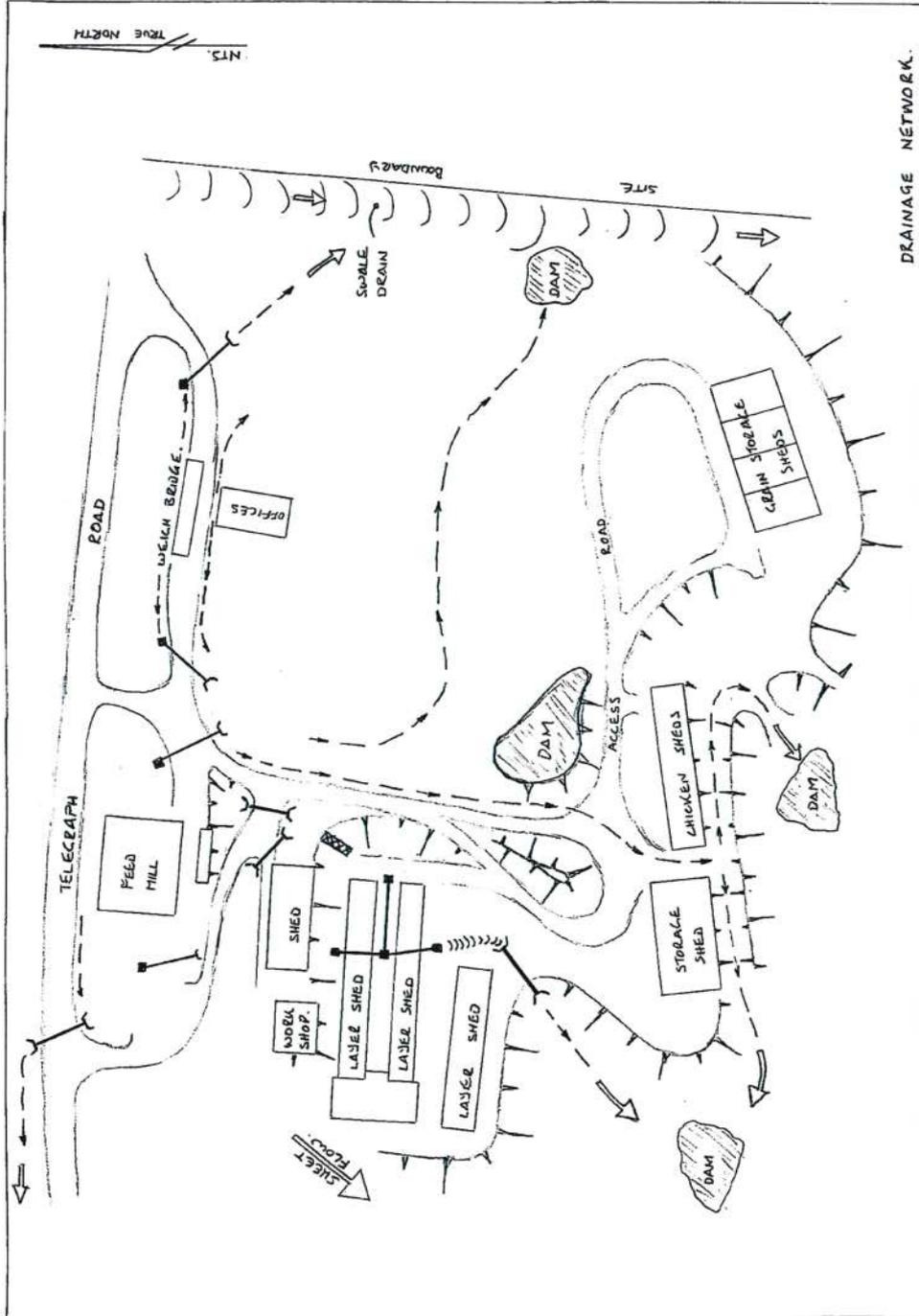


**ENVIRONMENTAL & POLLUTION
INCIDENT RESPONSE MANAGEMENT PLAN**

Riverina (AUSTRALIA) Pty Ltd

3.3 Surrounding Sensitive Environments

There are no immediate sensitive environments surrounding the Riverina Stockfeeds mill site. There is a series of on-site catchment dams to take any overflow directed to them through the piped, swale and bund network. This allows for treatment of any spill contaminants at these on-site locations. Refer drainage network plan for details.



3.4 Neighbouring Properties

Table 2.1 includes contact names and numbers of those properties most likely to be affected in the event of a pollution incident.

| Contact Person | Residential Address | Contact Numbers |
|--|---|---------------------|
| Residential property south side Riverina (Australia) | 90 Telegraph Road, Young NSW, 2594 | 02 6382 4847 Office |
| Hilltops Shire Council | Boorowa Street, Young NSW, 2594 | 02 6380 1200 |
| Crown Lands Division of NSW Planning and environment | Corner Johnston & Tarcutta Streets, Wagga Wagga | 1300 886 235 |
| Eastern side Mustafa Mohamed | Telegraph Rd, Young | 0439 916 666 |

Property adjoining the eastern and western boundaries of the site is vacant land owned by Riverina (Australia) Pty Ltd. Property to the north is vacant Common Property and to the south, vacant Crown Land.

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:

- A tank of Canola oil.
- 2 Tanks of Molasses
- Bulk oil unloading from road tanker
- IBCs containing liquid Alimet.

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

- Natural gas line,
- Oils and greases stored in the workshop
- Bunded Fuel storage diesel and petrol

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.

Other Pollution Risk from Manufacturing on site

1. Australian Mustard seed Oil
 - Oil
2. Engineering fabrication
 - Oil and greases

Canola Oil: is delivered in bulk road and pumped into the Bunded Oil Tank area. Any spills are captured by the bunded area and 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 = 3

Mustard oil: is taken off site in bulk oil tanks. Any spills are absorbed by bentonite. Risk Level = 4

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 workshop area. Maximum quantity stored on site inclusive of the other manufacturing is 28 x 20kg drums. Any spills are contained within the workshop and 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

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

Molasses Liquid: is delivered in bulk road and pumped into the Molasses Tank. Any spills are captured in newly bunded area and 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 = 3

Boiler Water: Boiler water waste is contained in the Boiler Blowdown Water and goes into the waste system. Risk Level = 3

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 = 2

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

Wastewater Treatment and Effluent System

A number of wastewater streams are generated at the site, including:

- Wash water from truck washing
- Domestic wastewater from office and amenities;
- Boiler blowdown

The wastewater treatment system consists of capture drains, which feed into a network of filtration systems. From there it is diverted through a series of bunds and swales to an on-site detention dam, where if required, water can be flocculated prior to leaving the site.

All waste from office and amenities joins directly into the septic sewer system. Risk Level = 3

6. Risk Identification

6.1. 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.

6.1.1. 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 |

6.1.2. 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. |

6.1.3. 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 sit 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 Health and Safety Manager | SafeWork NSW Tel: 131 050 |
| | NSW Health Tel: (02) 9391 9000 |
| Workplace Systems Manager | EPA – environment line TEL: 131 555 |
| Branch Manager | Hilltops Shire Council-Local Emergency Management Committee (LEMC) Tel: (02) 6380 1200 |
| Branch Manager (or in EMERGENCY, Production Manager or Shift Supervisor) | Fire and Rescue NSW Emergency Tel: 000 Alternative Tel: 1300 729 579 |

Table 1a Supplemental for specific Incident types affecting neighbours only;

Notification Template for the Management Team

| Site Management Team | Neighbours to be notified |
|----------------------|--|
| Branch Manager | Hilltops Shire Council-Local Emergency Management Committee (LEMC) Tel: (02) 6380 1200 |

Table 2; Notification Template for the Site Employees

| | | | |
|-----------------------------------|--|-------------------|-------------------------------|
| Safety First | <ul style="list-style-type: none"> ❖ 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. | | |
| Treatment | Provide First Aid or Medical Treatment, if required | | |
| | Ambulance | 000 | |
| | Young Hospital | (02) 6382 8888 | 68 Allanan St, Young NSW 2594 |
| Minor Spills or Emissions | <ul style="list-style-type: none"> ❖ 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. | | |
| Majors Spills or Emissions | <ul style="list-style-type: none"> ❖ 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 the Branch Manager, who will notify Managing Director, Chief Operating Officer and Health Safety and Environment Manager. ❖ Contact Christies Waste Disposal who is able to pump liquid wastes into the liquid waste removal truck for disposal, Tel: 0428 461 500. ❖ Call key people listed below in order. | | |
| Notify Key People | Branch Manager | Mob: 0437 665 280 | |
| | Managing Director | Mob: 0455 087 342 | |
| | Chief Operating Officer | Mob: 0408 767 533 | |
| | Health and Safety & Environment Manager | Mob: 0428 756 824 | |
| | Warehouse Manager | Mob: 0429 824 848 | |
| | Production Manager | Mob: 0400 462 344 | |
| Media Relations | 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. | | |

10. Emergency Response Equipment

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

- a. Liquid Spills can be absorbed by Bentonite (clay)
- b. Fire extinguishers
- c. 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.

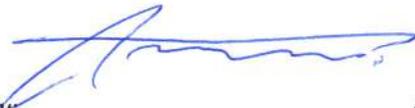
12. Plan Testing, Review and Maintenance

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

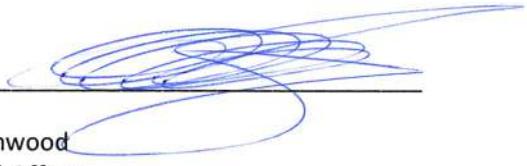
13. Approval & History

| Issue | Amended paragraphs/pages | Amendment Details | Date issued |
|-------|---|---|-------------|
| 1 & 2 | New PIRMP & version 2 | Undetermined under AMBOS stewardship | unknown |
| 3 | Not recorded | Undetermined under AMBOS stewardship | Sept 2019 |
| 4 | Conversion to Riverina | Executive and senior management changes inclusive of phone contact, addition of notification template for site employees, sign off by MD | June 2021 |
| 5 | Update pages 4 and 5 with the addition of Potential pollution types, renumbered to version 5 | Change to name of government office, addition of Alimet and gear oils, verification of contact numbers | 10/06/2022 |
| 6 | Updated page 4 with new eastern neighbour details. Updated Page 9 with new Riverina executive contact numbers. Updated page 5 with new risk rating on stored molasses and canola oil. Renumbered to Version 6 | New neighbour details added. New canola oil and molasses storage in bunded area reflected new lower risk rating on page 5. Changes to Riverina executive team reflected in updated contact numbers. | 30/1/24 |

| | | | |
|---|------------------|-----------------------------------|------------|
| 7 | Page 9, contacts | Contacts updated, risks reviewed. | 06.01.2025 |
|---|------------------|-----------------------------------|------------|

Approved by: 

Akira Matsui
Managing Director

Approved by: 

Michael Greenwood
Chief Financial Officer