AUSCOTT LIMITED

Pollution Incident Response Plan

Auscott Marketing Pty Ltd

Gwydir Valley Gin Operations

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Pollution Incident Response Plan

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Pollution Incident Response Plan

Environment Protection Licence 10988

Business Activity: Receival, Storage and Processing of Seed Cotton. The site consists of Cotton Module storage, Unidirectional weighbridge, Administration Building, Cotton gin, Cotton Bale Storage Pads and associated cotton trash disposal area.

The facilities peak activity period is during the cotton harvest period from April through August each year.

During the peak period there is a large number of truck movements delivering cotton modules to the facility and also transporting cotton bales away from the facility.

The processing plant, “Gin”, operates up to a maximum of 24 hours, 7 days a week until the season is completed.

Outside the peak season the gin is in repair and maintenance mode and the level of activity at the facility is greatly reduced.

Objectives of the Plan:

- Ensure comprehensive and timely communication about a pollution incident to staff at the facility, the EPA, NSW Health, Fire and Rescue NSW, SafeWork NSW, SES NSW, Rural Fire Service and the local council.
- Minimise and control the risk of a pollution incident at the facility through the identification of hazards and risks and the development of planned actions to minimise and manage those risks.
- Ensure that the plan is implemented effectively by responsible and trained staff and to test the plan regularly for accuracy, currency and suitability.

Date

Responsible Person:

Distribution List.

General Manager	Gin Manager
Farm Manager	Administration manager
WH&S Coordinator	Grower Services Manager

2.1 Definition of 'pollution incident'

The definition of a pollution incident is:

> *pollution incident* means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

(a) harm to the environment is material if:

  (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

  (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Industry is now required to report pollution incidents *immediately* to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

There are new associated offences, for individuals and corporations, for not preparing a plan, not keeping the plan at the premises to which it relates, not testing the plan in accordance with the Regulations and not implementing the plan in the case of an incident.

Location, Description and Likelihood of Hazards

Site	Hazard	Pre-emptive actions	Risk Rating
LPG Storage tank 62,000l.	Rupture of tank or fill hose during filling operation Fire resulting from leak and external ignition source	Tank undergoes regular maintenance Tank filled by reputable LPG Supplier Area surrounding tank maintain free of vegetation and ignition sources. Fire Hoses and fire extinguishers provided and maintained at tank	Low Low
Trash Yard	Fire. Burning trash from gin fire transported and dumped in trash yard setting alight stored trash Contaminated runoff from yard after rain	Trash is stored in long windrows which limits the quantity of trash that would burn. The trash yard is isolated from the main work area and module storage yards. A trash yard fire would generate a reasonable amount of smoke but would not put people in danger All runoff is captured in a closed drainage system which runs to a lift pump where it is pumped into earthen wall dam.	Low Low
Module Yard	Fire. Stored cotton modules could be set on fire through a number of avenues • A "hot" module delivered to the yard which ignites • External ignition source Contaminated runoff from yard after rain	The Company has a comprehensive firefighting manual and procedures and extensive investment in firefighting equipment. Any fire outbreak would be quickly contained and extinguished. The module yard is separated from the main work areas and a fire would generate a reasonable amount of smoke but would not put people in danger. All runoff is captured in a closed drainage system which runs to a lift pump where it is pumped into earthen wall dam.	Low Low
Bale Pad	Fire. Stored cotton bales ignited by fire bales from gin. A fire would generate considerable heat and smoke.	Comprehensive firefighting manual and procedures, extensive investment in firefighting equipment	Low
Diesel Fuel Storage Tank Capacity 4,500l	Spill. Tank overfilled, hit by passing machinery	Above ground storage. Not located near waterway, equipment available to contain leaking diesel	Low

Cyclone System	Cyclone malfunction causing gin dust emissions to atmosphere	Gin dust emissions are non-toxic. Cyclones are located externally to work area and pose minimal health risk	Low
Transformer Yard	Fire. Release of inert oil, up to 1000l, from transformers, toxic fumes and smoke released to atmosphere	Transformer yard surrounded by concrete bund, Transformers owned and maintained by Essential Energy, undergo annual inspection and maintenance program Transformer yards located in low traffic areas and away from main work areas. Exposure to fumes and smoke could cause serious health problems.	Low High Health risk

Inventory of Pollutants

Pollutant	Location	Map Reference
Diesel Fuel	Fuel Storage Tank	
LPG	LPG Storage Tank	
Cotton Trash	Trash Yard	
Gin Dust	Cyclone Rack	
Agricultural Chemicals	Chemical Shed	

Maps

Site Map Includes

- Gin
- Bale Pad
- Diesel Fuel Storage
- Trash yard
- Module Yard
- LPG Tank
- Channels
- Transformer Yard

Safety Equipment

Hazard	Equipment
Fire	Isuzu fire truck Water Tanker Fire Suppressant Foam 200kl water supply Electric/diesel water pump set Hydrant and hose reel system
Fuel / Chemical Spill	Spill Containment Kit Bunded storage

Pollution Incident Response Plan

Phase 1 Potential Pollution Incident Reported: Incident Assessment

The Pollution Incident Response Plan may be triggered by the report of a potential pollution incident to the Gin Manager / Shift Supervisor.

- The Gin Manager / Shift Supervisor will begin preliminary assessment of the incident to determine the severity of the incident i.e. “if there is risk of material harm to the environment”.
- If it is likely that the environment will be harmed then it is a notifiable incident. Refer to definition of pollution incident and material harm.
- If it is a notifiable incident the Gin Manager / Shift Supervisor will contact the Valley General Manager of the incident.
- The General Manager or his representative will immediately notify the EPA and begin actions to activate the Crisis Management Plan.

Phase 2 Response: Plan initiation

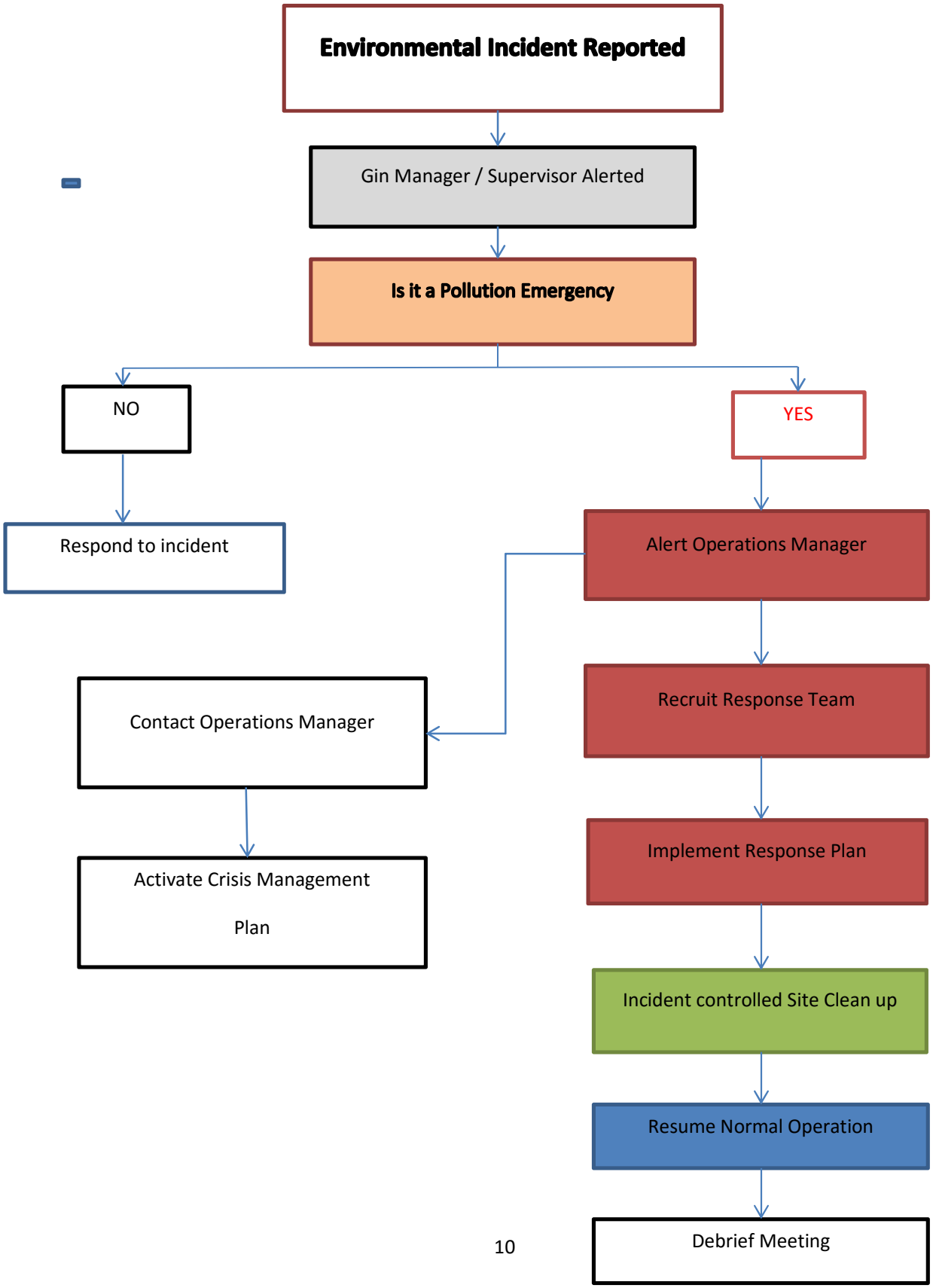
- The Gin Manager / Shift Supervisor will assemble an incident response crew
- The General Manager will assemble a crisis management team and commence the crisis response plan
- The Gin Manager / Shift Supervisor will
    - make resources available to the response crew
    - Alert all people on site, employees, contractors, visitors, to the emergency and commence emergency response procedures.
    - commence record keeping – Incident Report Form
- The Incident response crew will
    - Develop a plan to respond to the emergency
    - Assemble required resources
    - Respond to the emergency and control the pollution incident
    - Communicate and cooperate with any / all state emergency authorities: Rural Fire Service (RFS), Police, State Emergency Service (SES), WorkCover and EPA.
- The State Authorities will take control of incident response activities as and when necessary.
- The WH&S Coordinator will
    - Assist with implementation of emergency procedures
    - Take over from the Gin Manager / Shift Supervisor responsibility for gathering environmental information and records and commence incident investigation.

Phase 3 Response Completion - The pollution incident has been controlled

- The General Manager / Gin Manager will resume control of the site after hand over from State Authorities.
- The response crew will commence mopping up activities:
    - Ensure all waste material from the incident does not escape from control and is disposed of legally, safely and properly
    - Equipment and machinery washed down and return to normal service
- The response crew leader will report to Gin manager / Shift Supervisor when incident site is ready to be returned to normal activity.
- The Gin Manager / Shift Supervisor will inspect workplace to ensure it is safe and operational.
- The WH&S Coordinator will complete incident investigation report
- All Managers and Employees involved in the incident response activities will attend an incident debrief meeting from which a written report will be prepared.

Pollution Incident Response Plan

Reference Chart



Communicating with Employees, Neighbours and local Community

Internal Contact Details

Sean Boland Valley Operations Manager sboland@auscott.com.au **Gwydir Valley Co-ordinator** 02 6759 1737 Mob 0428 591 875, Fax 02 6759 1788	**Mel Kong** Gin Manager mkong@auscott.com.au **Liaison/co-ordination of incident control - gins** 02 6759 1781 Mob 0488 591 997 Fax 02 6759 1788 Home 02 6752 6265
Rod Gordon Farm Manager rgordan@auscott.com.au **Liaison/co-ordination - affected growers** 02 6759 1705 Mob 0428 591 705 Fax 02 6759 1788	**Cathy Colless** Administration Manager ccolless@auscott.com.au **Liaison Auscott financials** 02 6759 1721 Fax 02 6759 1788
Jeff Rutter WH&S Coordinator jrutter@auscott.com.au **Liaison - injured employees and families; counselling arrangements** 02 6759 1728 Mob 0419 591 780, Fax 02 6759 1788	**Peter John Gileppa** Grower Services Manager pjgileppa@auscott.com.au **Liaison - affected growers** 02 6759 1731 Mob 0428 991 423, Fax 02 6759 1788

Crisis management Plan: Refer to Company Intranet Site

External Contact List

EPA	02 6773 7000	**13 15 55**
SafeWork NSW	02 6792 8720	**13 10 50**
SES		**000**
Fire brigade	**02 6752 7620**	**000**
Police	**02 6757 0799**	**000**
Ambulance	**13 12 33**	**000**
Emergency		**000**

Minimising Harm to people on the premises

Refer to Visitor policy and Procedures

Fire Emergency Response Procedures

Staff Training

All staff will attend a seasonal induction and training sessions at the beginning of each Ginning Season. The induction program will include an information and training session on

- Firefighting procedures,
- Module, Trash Yard and Bale Pad surveillance
- Operate Fire Fighting Equipment
- Weekly Fire Drills
- Emergency response procedures.

Management staff will attend an annual crisis management simulation exercise.