



Pollution Incident Response Plan

Auscott Marketing Pty Ltd
Murrumbidgee Valley Gin Operations
Hay Gin

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Environment Protection Licence 20586

Business Activity:

Receival, Storage and Processing of Seed Cotton. The site consists of Cotton Module storage, Weighbridge, Administration Building, Cotton Gin, Cotton Bale Storage Facility 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 a large number of truck movements delivering cotton modules to the facility and also transporting cotton bales away from the facility.

The cotton processing plant or "Gin" operates 24 hours, 7 days a week removing waste trash and seed and packaging processed cotton into bales that is transported by road. This continues until the season is completed.

The waste by-product called "cotton trash" is stored in the trash yard.

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, SafeWork NSW, SES NSW and the Rural Fire Service.
- 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. This current version of the Pollution Incident Response Plan has been tested and revised through implementation of the Pollution Incident Response Scenario.

Date

Responsible Person:

Distribution List.

Distribution List

Gin Manager: Craig Gaston

WHS&E Coordinator: Karen Martin

Grower Services Manager: Eddie Redfern

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External Contact List

Communicating with Neighbours and local Community

| OFF-SITE | | |
|---|--|-------------------------------|
| Organisation | Phone | Fax |
| Work Cover (Stuart Larkin) 104-110 Banna Avenue (PO Box 1784) Griffith NSW 2680 | 02 6962 8900/ 02 6962 8901 | 02 6964 1738/ 02 9287 4817 |
| Regional EPA (Darren Wallett) Suite 7-9 Level 1, 130-140 Banna Avenue (PO BOX 397) Griffith NSW | 02 6969 0700 0427 255 214 | 02 6969 0710 |
| SES Rescue Squad 206 Fernleigh Road WAGGA WAGGA NSW 2650 CC*- Call Centre HDO** – Hay Duty Officer | 02 6932 9199 (CC)* 13 25 00 (HDO)** 0429 038 777 | 02 6932 9190 |
| Fire Brigade-General Business 380 Macauley St, Hay NSW | 02 6993 1101 | |
| Bush Fire Brigade | 02 6993 4213 | |
| Ambulance– General Business | 02 6993 1705 | |
| Police 412 Moppett St, Hay | 02 6993 1100 | |
| Hay Hospital 351 Murray Street Hay 2711 | 02 6990 8700 | 6990 8771 |
| Ambulance/Police/Fire Brigade (Emergency) | 000 | |

Internal Contact Details

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|---|---|
| <p>Craig Gaston Gin Manager cgaston@auscott.com.au Murrumbidgee Valley Co-ordinator. Tel. 02 6997 2203 Mob. 0407 776 885 Fax. 02 6997 2222</p> | <p>Eddie Redfern Grower Services Manager eredfern@auscott.com.au Liaison - Affected growers. Tel. 02 6997 2204 Mob. 0418 554 498 Fax. 02 6997 2222</p> |
| <p>Karen Martin WHS&E Coordinator Murrumbidgee Valley kmartin@auscott.com.au Liaison – Regulatory authorities and environmental information. Liaison – Injured employees. Tel. 02 6997 2209 Mob. 0427 591 728 Fax 02 6997 2222</p> | <p>Lenna Nagele Auscott Administration lnagele@auscott.com.au Liaison - Auscott financials Tel. 02 6799 1453 Mob. 0438 991 429 Fax. 02 6799 1488</p> |

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Location, Description and Likelihood of Hazards

| Site | Hazard | Pre-emptive actions | Risk Rating |
|-------------------------------|--|--|-------------|
| LPG Storage tank 66,000lt. | Rupture of tank or fill hose during filling operation | <ul style="list-style-type: none"> Tank undergoes regular maintenance. Tank filled by reputable LPG supplier. Area surrounding tank is maintained be free of vegetation and ignition sources. | Low |
| | Fire resulting from leak and external ignition source | <ul style="list-style-type: none"> Fire hoses and fire extinguishers are provided and maintained at tank. | Low |
| Trash Yard | Fire – Burning trash from gin. Fire could be transported and dumped into the trash yard from the Gin Mote, setting alight stored trash. | <ul style="list-style-type: none"> 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. | Low |
| | Contaminated runoff from yard after rain | The trash that is a by-product of the ginning process is considered to be a resource. It is converted to compost. There is little chance of contaminants from the compost entering water sources due to the distance to the nearest water source | Low |
| Module Yard | Fire - Stored cotton modules could be set on fire through a number of avenues <ul style="list-style-type: none"> A “hot” module that is delivered to the yard and ignites. External ignition source. | <ul style="list-style-type: none"> The Company has a comprehensive firefighting manual and procedures. Auscott Limited has an extensive investment in firefighting equipment. Any fire out-break 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. | Low |

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| Site | Hazard | Pre-emptive actions | Risk Rating |
|------------------|---|---|------------------------------------|
| Bale Pad | Fire – Stored cotton bales ignited by fire bales from gin. A fire would generate considerable heat and smoke. | <ul style="list-style-type: none"> Identified fire bales are segregated from the stored bales. Comprehensive firefighting manual and procedures. Extensive investment in firefighting equipment. | Low |
| Cyclone System | Cyclone malfunction causing gin dust emissions to atmosphere | <ul style="list-style-type: none"> Gin dust emissions are non-toxic. Cyclones are located externally to the work area and pose minimal health risk. | Low |
| Transformer Yard | <p>Fire – Release of inert oil of up to 1000lt. from transformers.</p> <p>Toxic fumes and smoke released to atmosphere.</p> | <ul style="list-style-type: none"> The transformers are owned and maintained by Essential Energy and undergo an inspection and maintenance program. Transformer yards located in areas away from main work areas. <p>Exposure to fumes and smoke could cause serious health problems.</p> | <p>Low</p> <p>High Health risk</p> |

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Inventory of Pollutants

| Pollutant | Location Map Reference |
|------------------|-----------------------------------|
| LPG | LPG Storage Tank |
| Cotton Trash | Trash Yard |
| Gin Dust | Cyclone Rack |
| Diesel Fuel | Diesel Storage |
| Oil/Toxic Fumes | Electricity Transformer – Gin 11 |

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Safety Equipment

| Hazard | Equipment |
|----------------|--|
| Fire | Isuzu Fire Truck Water Tanker Fire Suppressant Foam 200kl water supply Diesel water pump set Hydrant and hose reel system |
| Chemical Spill | Spill Containment Kits |

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Crisis management Plan

Refer Appendix 1
Available on Intranet

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Minimising Harm to people on the premises

Refer to Visitor Policy and Procedures – Appendix 2 Available on Intranet
Fire Emergency Response Procedures – Appendix 3 Available on common drive

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Maps

Site Map – Appendix 4

- Gin
- Bale Pad
- Diesel Fuel Storage
- Trash yard
- LPG Tank
- Transformers

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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
- Operate firefighting equipment
- Emergency response procedures

Management staff will attend an annual crisis management simulation exercise.

Test Pollution Response Scenarios

| Date | Pollution Response Scenario | WHS Monitor # |
|------------|---|---------------|
| 21/06/2016 | Trash Yard Fire | DRLR-38 |
| 17/05/2018 | LPG Storage Tank rupture of tank or fill hose | DRLR-36 |
| 31/05/2019 | Trash Yard Fire | DRLR-1 |
| 17/06/2020 | Bale Pad Fire | DRLR-37 |
| 02/06/2021 | FEL Front End Loader fire in the module yard | DRLR-55 |
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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 Shift Supervisor.

- The 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 there is likelihood that the environment will be harmed, then it is a notifiable incident.
- If it is a notifiable incident the Shift Supervisor will contact the Murrumbidgee Gin Manager of the incident.
- The Murrumbidgee Gin Manager or his representative will immediately notify the Environmental Protection Authority 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 Operations 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), SafeWork, and NSW Environment Protection Authority (EPA).
- The State Authorities will take control of incident response activities as and when necessary.
- The WHS&E 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.

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Phase 3 Response Completion - The pollution incident has been controlled

- The Operations 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 WHS&E 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.

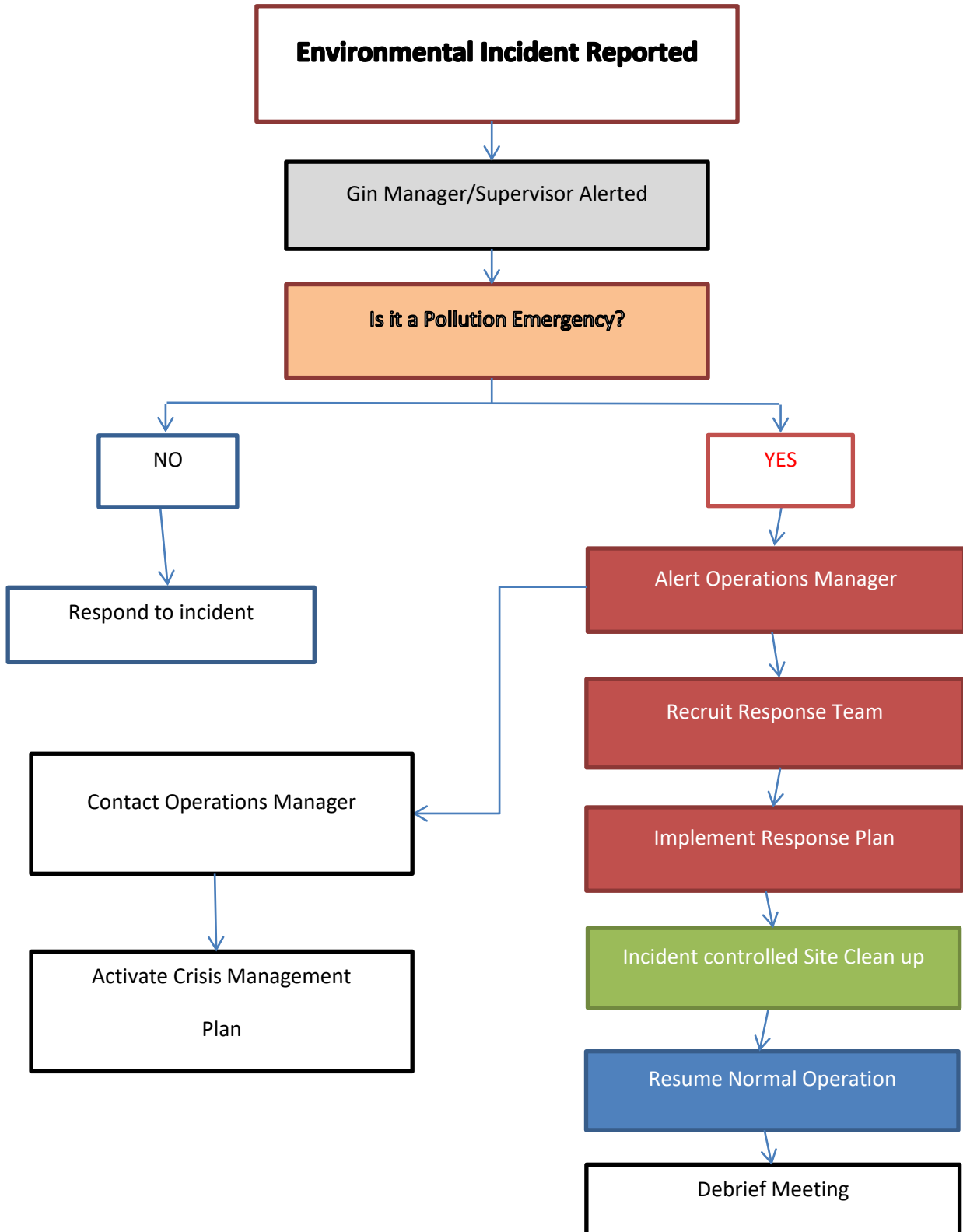
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Response Chart



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