



Pollution Incident Response Plan

Australian Food & Fibre Macquarie Valley Gin Operations Trangie Gin

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Environment Protection Licence 11204

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 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”, can operate 24 hours per day, 7 days a week. The Gin removes waste trash and seed and packages the processed cotton into bales. The processed cotton is either transported by road or stored onsite and packed into containers that are freighted by rail. This continues until the season is completed.

The waste by-product called “cotton trash” and is transport to a site where it is incorporated into the soil. Here the trash is broken down into compost, increasing the levels of soil carbon.

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.

Responsible Person: Sam Freeth

Distribution List:

Gin Manager: Sam Freeth
WHS&E Coordinator: Rick Horne
Weighbridge Manager: Cathy Gillespie
EPA Liaison: Jeff Rutter

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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.

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Location, Description and Likelihood of Hazards

Site	Hazard	Pre-emptive actions	Risk Rating
LPG Storage tank 59,000l.	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. 	Low
	Fire resulting from leak and external ignition source	<ul style="list-style-type: none"> • Area surrounding tank maintain free of vegetation and ignition sources. • Fire Hoses and fire extinguishers 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	<p>The trash that is a by-product of the ginning process is considered to be a resource. It is converted to compost increasing levels of soil carbon. There is little chance of contaminants from the compost entering water sources due to the distance to the nearest water source.</p>	Low

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Location, Description and Likelihood of Hazards

Site	Hazard	Pre-emptive actions	Risk Rating
Module Yard	<p>Fire - Stored cotton modules. Modules could be set on fire through a number of avenues</p> <ul style="list-style-type: none"> • A “hot” module delivered to the yard which ignites • External ignition source 	<ul style="list-style-type: none"> • The Company has a comprehensive firefighting manual and procedures. • AFF has an 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. <p>All runoff is captured in a closed drainage system which runs to a lift pump where it is pumped into earthen wall dam.</p>	Low
	<p>Contaminated runoff from yard after rain</p>		Low
Bale Pad	<p>Fire – Stored cotton bales Cotton bales could be ignited by fire bales from gin. A fire would generate considerable heat and smoke.</p>	<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	<p>Cyclone malfunction causing gin dust emissions to atmosphere</p>	<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

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Site	Hazard	Pre-emptive actions	Risk Rating
Transformer Yard	Fire. Release of inert oil, up to 1000lt. from transformers.	<ul style="list-style-type: none"> • Transformer yard is surrounded by concrete bund. • The transformers are owned and maintained by Essential Energy and undergo an annual inspection and maintenance program. • Transformer yards located in low traffic areas and away from main work areas. 	Low
	Toxic fumes and smoke released to atmosphere.	Exposure to fumes and smoke could cause serious health problems.	High Health risk
Diesel Fuel Storage Tank Capacity 10,000lt	Spill. Tank overfilled, hit by passing machinery	Above ground storage, protected by steel bunding. Not located near waterway, equipment available to contain leaking diesel	Low

Inventory of Pollutants

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

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Safety Equipment

Hazard	Equipment
Fire	Isuzu Fire Fighter 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

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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 Operations Manager of the incident.
- The Macquarie Valley General 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 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), SafeWork NSW, EPA.
- The State Authorities will take control of incident response activities as and when necessary.

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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.

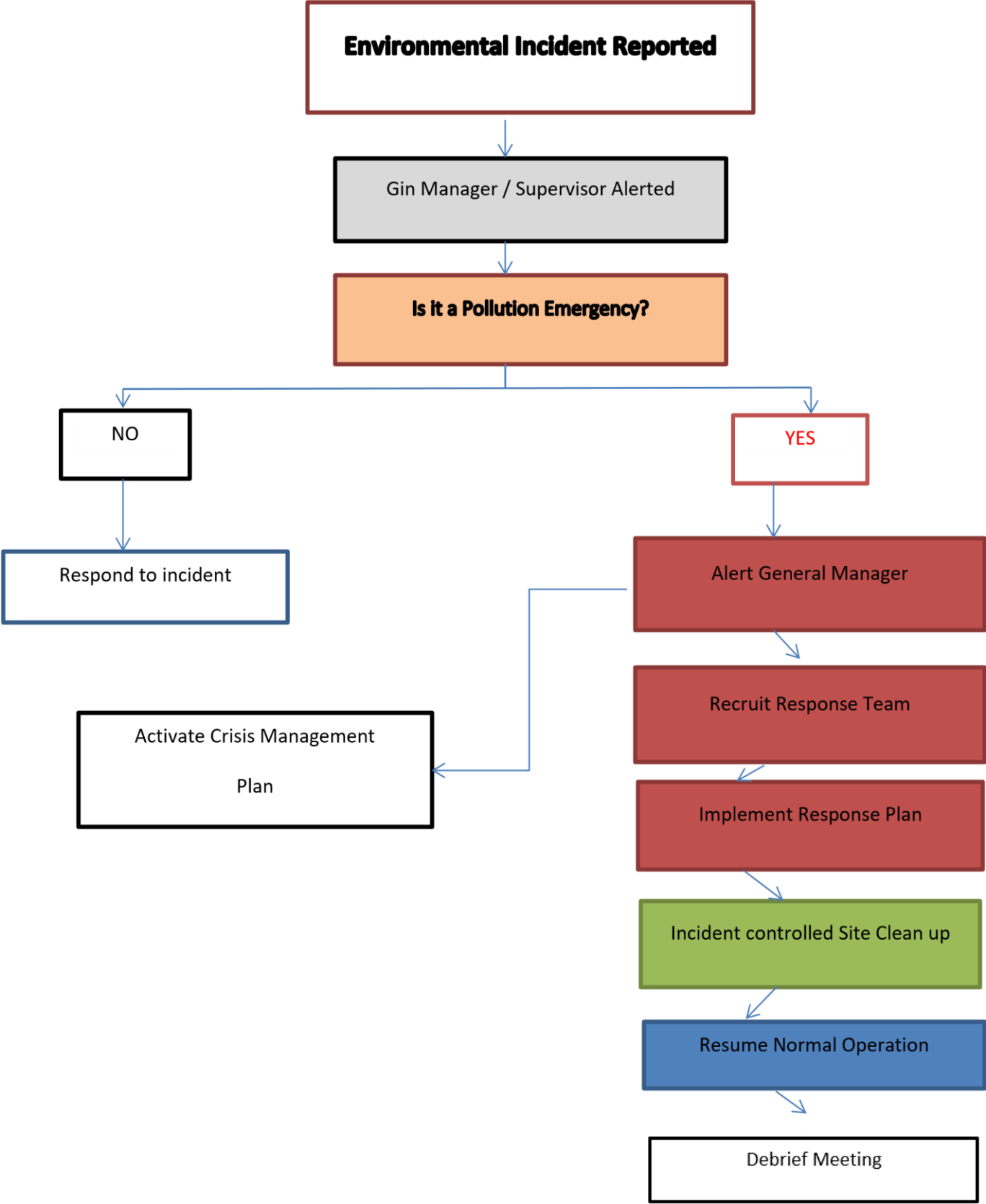
Phase 3 Response Completion - The pollution incident has been controlled

- 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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Communicating with Employees, Neighbours and local Community

Internal Contact Details

<p>Rick Horne WHSE Coordinator Macquarie Valley rhorne@australianfoodandfibre.com.au Liaison – Injured employees & families; counselling arrangements Mob. 0497 571 755 Fax. 02 6847 4399</p>	<p>Sam Freeth Gin.Manager sfreeth@australianfoodandfibre.com.au Liaison - Coordination of incident control - gins Tel. 02 6888 7266 Mob. 0427 277 391 Fax. 02 6847 4399</p>
<p>Rebecca Johnstone Grower Services Manager rjohnstone@australianfoodandfibre.com.au Liaison - Affected growers Mob. 0428 837 317 Fax. 02 6847 4399</p>	<p>Craig Gaston Southern Region Manager – Ginning & Warehousing cgaston@australianfoodandfibre.com.au Southern Region Gin Coordinator Mob. 0407 776 885 Fax. 6997 2222</p>
<p>Jeff Rutter EPA Liaison jrutter@australianfoodandfibre.com.au Liaison – EPA Compliance & Correspondence Mob. 0419 591 780 Fax. 6792 1800</p>	

External Contact List

EPA	02 6883 5330	13 15 55
SafeWork NSW	02 6792 8720	13 10 50
SES		000
Fire brigade	02 6888 7422	000
Police	02 6888 7202	000
Ambulance	13 12 33	000
Emergency		000

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Crisis management Plan

Refer to Company Intranet

Minimising Harm to people on the premises

Refer to Visitor Policy and Procedures

Fire Emergency Response Procedures

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Maps

Site Map – Appendix 4

- Gin
- Bale Pad
- Diesel Fuel Storage
- Trash yard
- Chemical Shed
- LPG Tank □ Channels
- Transformer Yard

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 Fire Fighting Equipment
- Emergency response procedures.
- Pollution incident response procedures (including incident response scenario)

Management staff will attend an annual crisis management simulation exercise.

Pollution Incident Response Scenario's

Date	Pollution Response Scenario
25/08/2021	Front End Loader on fire in module yard
17/08/2022	Moon buggy collision with diesel storage tank
13/10/2023	Fire in trash yard with strong winds blowing towards module yard

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