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BRIGHANN GINNING PTY LTD

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

COMPANY DETAILS:

Brighann Ginning Pty Ltd
Environment Protection Licence - 11286

1. FACILITY DETAILS:

Licensee:	Brighann Ginning
Facility Name:	Brighann Ginning
EPA Licence Number:	11286
Scheduled Activity:	Agricultural Processing (Cotton Gin)
Facility Address:	1500 Watercourse Road, Moree NSW 2400

2. PLAN PURPOSE

The Pollution Incident Response Management Plan (“PIRMP”) has been developed in accordance with the requirements of the EPA. This PIRMP is available to the public at our office address – 1500 Watercourse Road, Moree, NSW 2400. The PIRMP covers Brighann Ginning Pty Ltd.

The purpose of the PIRMP is to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the plan will be implemented immediately.

3. LEGISLATIVE REQUIREMENTS 3. 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 reported to the EPA if there is a risk of “material harm” to the environment, which is defined in section 147 of the POEO Act as:

- 1) Harm to the environment is material if:
 - a) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
 - b) it results in actual or potential loss of property damage of an amount or amounts in aggregate exceeding \$10 million; and
- 2) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practical measures to prevent, mitigate or make good harm to the environment.

4. INCIDENT RESPONSE PROTOCOLS

Brighann Ginning Pty Ltd takes action to prepare for and prevent emergencies and critical incidents. This would include:

- identifying on-site and off-site situations that have the potential to become emergencies or critical incidents that would affect site operations;
- determining potential risks associated with particular situations;
- using risk management practices to assess the potential risks and develop mitigation strategies;
- developing an *Emergency and Critical Incident Management Plan* that considers the management of foreseeable risks;
- communicating the plan to all staff;
- training key staff;
- testing and modifying the plan annually;

If a pollution incident occurs at the site the following steps should be followed by the Operations Manager or Administration Manager or the Shift Manager.

Below is the Incident Response Protocol:

A) Assess Risk Materiality (pollution incident occurs) – Phase 1

- Firstly, call 000 if the incident presents an immediate threat to human health or property or there are injured persons.
- Ensure the safety of all persons on the site. Evacuate if necessary.
- Identify the severity, risks, and extent of the incident.
- What is the substance emitted?
- What are its properties?
- Is there a risk to health and safety?
- Do you have the necessary PPE to manage the emission?
- What is the volume of the emission?
- If the emission has the potential to cause material harm to persons or property or the environment, execute the next phase of the PIRMP NOTIFY PHASE 2
- Assess potential for off-site impacts to the community and the environment.

B) Notify – Phase 2

Contact key individuals:

- Individuals responsible for activating the PIRMP (nominated site representatives),
- Individuals authorised to notify and co-ordinate relevant authorities (nominated representatives).
- Notify Relevant Authorities If it is determined that the pollution incident is a material harm incident in accordance with Section 9.
- If the incident does not require an initial combat agency, or once the 000 call has been made then the Operations Manager will notify the relevant authorities in the following order.

- a) EPA
- b) Ministry of Health via the local Public Health Unit
- c) WorkCover Authority
- d) Police, Fire and Rescue NSW
- e) If required notify community members via the Community Notification Protocol.

Please refer to contact details in Section 14.

C) Stop – Phase 3

- Read “Material Safety Data Sheet” and label for response (if applicable).
- If safe to do so stop the source of the emission.
- If pollutant or contaminant cannot be identified wait for relevant public service (e.g. Fire and Rescue) or instruction from the Operations Manager or Administration Manager or the Shift Manager.
- Manage incident in accordance with the site PIRMP.

D) Contain Incident – Phase 4

- Utilise barriers (absorbent booms, banks of soil or any other safe objects) or spill absorbent to prevent the emission or leak from spreading.
- The main priority is to prevent the emitted or leaked material from discharging off site.
- If necessary minimise the impact of potential off-site spreading.

E) Clean Up – Phase 5

- Clean up and remedial actions to restore the environment.
- Disposal of pollutants in accordance with EPA regulations.

F) Review

- Conduct an investigation into the incident and assist the EPA and investigators with external enquiries (if applicable).
- Complete internal reporting.
- Test the effectiveness of the PIRMP within one month after the incident to ensure controls are replenished.

5. POLLUTION INCIDENT NOTIFICATION PROCEDURES AND CONTACTS

This section sets out details on the communication protocols for a pollution incident which has occurred in the course of activities for the Site which has resulted in or has the potential to result in a material impact to human health or the environment.

A. COMMUNICATION INTERNALLY

For internal notification, contact details are as follows:

- If a material pollution incident occurs at the site or outside the site as a consequence of the site activities then the employee must promptly notify (by telephone) the Operations Manager or Administration Manager or the Shift Manager. Do not hesitate to call these representatives regardless of the time.
- If an employee or contractor for the site discovers a pollution incident they must report the pollution incident to the Operations Manager which in turn must notify the individuals via the process specified above. Contact details are as follows:

Contacts, Title and Contact Numbers:

Operations Manager	Damian Tonkin	0427 865 258
Administration Manager	Lee-anne Skaines	02 6753 3737
Shift Manager		02 6753 3737
Town Office	John Seery	02 6752 3899

B. COMMUNICATION WITH EXTERNAL GOVERNMENT AGENCIES STAKEHOLDERS

The relevant external agencies will be notified of a material pollution incident without delay. The following parties should be notified promptly on the following contact details:

Environmental Protection Authority (EPA)	02 9995 5000	131 555 (emergency 24 hour service number)
NSW Health	02 6764 8000	
Local Council – Moree	02 6757 3222	
Work Cover NSW	131 050	
Police/ Fire/ Rescue	000	

C. COMMUNICATION WITH LOCAL COMMUNITY (COMMUNITY NOTIFICATION PROTOCOL)

The Operations Manager, and/or General Manager must assess if community members or their property may potentially be affected by a **material pollution** incident, if this is the case then community members must be notified immediately without delay by one of the following methods:

- Door knocking if an emergency event;

- Phone call by a Brighann Ginning representative; and
- In writing if appropriate for continuing material pollution incident.

The appropriate method of communication will be determined by the nature of the pollution incident or as directed by the relevant agency.

Community members are to be notified within these areas at the earliest convenience.

Neighbouring Sites

Site	Name	Bus Phone	Mobile Phone
BRIGHANN FARM	MICHAEL SEERY	02 6753 3722	0428 228803
RIDGEWOOD FARMING	CLARE SEERY	02 6753 3714	0427 533714

D. UPDATES

Regular updates to relevant government agencies and community members will be provided using the relevant protocols.

INVENTORY OF POLLUTANTS

Tank ID no:	Dangerous Goods			Tank		
	Name	Class	UN no.	Type	Capacity	Average
1	LP gas	2.1		Above Ground	75,000	45,000
2A	Diesel			Above Ground	16,000	10,000
2B	Petrol			Above Ground	200	100

Gas supplied by KLEENHEAT: **Emergency Number: 1800 093 336**

POTENTIAL POLLUTANTS

Potential Pollutants	Hazard	Likelihood	Pre-Emptive Actions	Emergency Level
Cotton Modules / Cotton Trash	Fire / Smoke	Low	*Fire breaks/ roads segregate module pads.	Site / External
Gin Cotton	Fire / Smoke	Moderate	*Monitor module moister levels. *Fire reels and extinguishers	Local / Site

Cotton Bale	Fire / Smoke	Low	*As above	Site / External
Stored Diesel	*Leaks / Spills *Fire	*Low *Low	* Bunding Containment Wall *No Smoking Zone *Fire Extinguishers	Local
Stored Petrol	*Leaks / Spills *Fire	*Low *Low	* Bunding Containment Wall *No Smoking Zone *Fire Extinguishers	Local
Bulk LPG Storage	*Leaks *Explosions	*Low *Low	* Regular ground maintenance *No Smoking *Fire Hydrant	Site

SITE SPECIFIC SAFETY EQUIPMENT

Fire Reels	Throughout Gin & Site
Fire Extinguishers	Throughout Gin & Site
2 Water Trucks with fire hoses and pumps	All staff trained in Fire Truck use
2 Front end loaders	
Water storage for filling water trucks	1 Mega litre
MSDS	Production Office

EMERGENCY SERVICES

Fire Ambulance Police	000
SES	(02) 6752 4166
Moree Hospital	(02) 6757 0000