



AD MEATS

AD Meats

Pollution Incident Response Management Plan (PIRMP)

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1. INTRODUCTION AND BACKGROUND

AD Meats, possesses Environmental Protection License (EPL), Number 7667. This License is required under the *Protection of the Environment Operations Act 1997* (POEO Act).

Under legislation managed by the NSW Environment Protection Authority (EPA) there is a duty to report pollution incidents under section 148 of the POEO Act.

In 2012, *changes under the Protection of the Environment Legislation Amendment Act 2011* required holders of an EPL to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The Pollution Incident Response Manage Plan must:

1. Be kept at all times at the premises;
2. Include information as required in the legislation;
3. Be tested annually; and
4. Be implemented if a pollution incident does occur.

This PIRMP has been developed to ensure that pollution incidents resulting in or having the potential to cause material harm to the environment are correctly managed and reported. This notification environmental incidents under this PIRMP is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined in the POEO Act.

If you have any questions about this plan, or suggested revisions, please contact Lee Jones on 0438 371 644

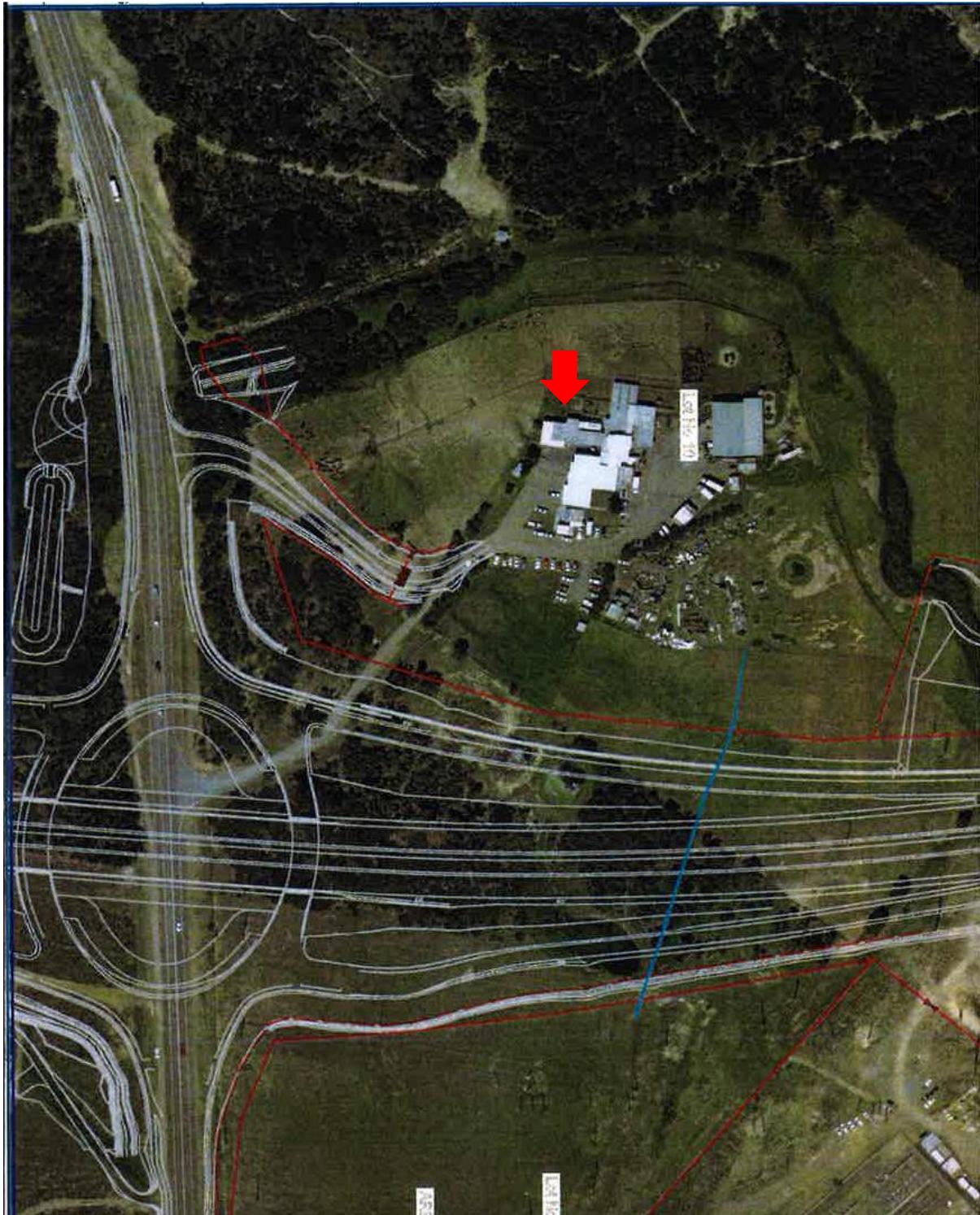


2. SITE INFORMATION

2.1 Site Location

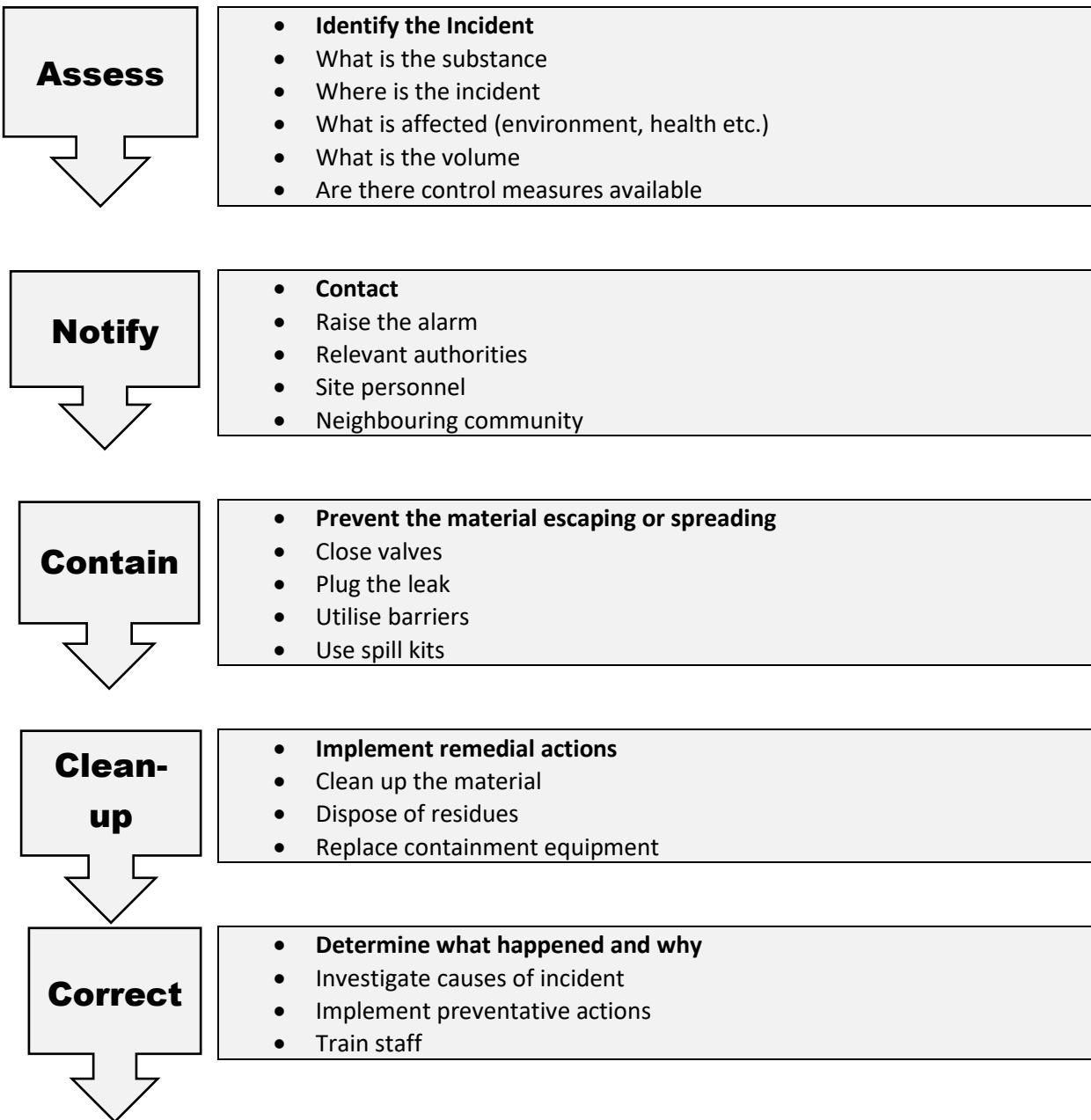
AD Meats is located in a rural area at 181 Main Road, HEDDON GRETA NSW 2321. This site is predominantly a meat processing plant with a wholesale, distribution and administration. AD Meats does not render any bi-product on this site.

The following diagram illustrates the location of AD Meats



3. OVERVIEW OF THE PIRMP

The following summarises the actions to be undertaken by AD Meats should a pollution incident occur or to be suspected to have occurred. This Pollution Incident Response Management Plan (PIRMP), contains the necessary detail and information to effectively manage a pollution incident.



4. NOTIFICATIONS

4.1 Introduction

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 circumstance 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.

If a spill occurs on site that has resulted in or has the potential to cause material harm to the environment the authorities and other personnel as listed on page 6 will be notified immediately. Additional organisations that may be contacted are listed on page 8.

Employees are instructed to report any environment or safety incident to their Supervisor, and to activate the emergency evacuation plan.

If an environmental incident occurs that is a potentially notifiable pollution event it must be reported to Paul Wilson. Paul is responsible for consulting relevant AD Meats personnel to assess if a notifiable pollution incident has occurred and then commence the external authority reporting process.

4.2 Notification Protocol

All AD Meats employees and contractors working at the premises are responsible for alerting management personnel to all environmental incidents or hazards, which may result in a material environmental incident, regardless of its nature or scale.

The following summarises the notification protocols to be adopted by AD Meats personnel.

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

Sufficient details of the incident must be reported to the EPA to enable appropriate follow-up action. The relevant information required includes:

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity of volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred (including the cause of the incident, if known); and
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.
- Any information that is not known when the incident is notified must be provided immediately once it becomes known.

Paul Wilson or Lee Jones must notify the agencies listed in the following table below, in the provided order if a pollution incident has occurred that is classified as a **material harm incident** immediately.

AGENCY	CONTACT DETAILS
Fire and Rescue	000 (to be contacted first in this order if the incident also presents an immediate threat to human health or property and emergency services are required, or last in this order if emergency responses is not required) 1300 729 579
Cessnock City Council	4993 4100 Environmental Health team 4993 4300 Reception
EPA	131 555
NSW Ministry of Health	9391 9000
Safework NSW	13 10 50

The AD Meats personnel that have allocated specific responsibilities in relation to the management of a pollution incident are summarised in the following table:

NAME	CONTACT DETAILS	POSITION	RESPONSIBILITY
Robert Gill	B/H 02 4937 1644 A/H 0418 635 237	Managing Director	
Paul Wilson	B/H 02 4937 1644 A/H 0438 291 906	General Manager	<ul style="list-style-type: none"> • Responsible for undertaking notification as defined in this PIRMP • Responsible for managing and coordinating the response to a pollution incident • Responsible for communicating PIRMP to site personnel • Responsible for coordinating communications with affected community members • Ensure site personnel are aware of this PIRMP • Responsible for ensuring notification and training of PIRMP
Lee Jones	B/H 02 4937 1644 A/H 0438 371 644	Administration Manager	<ul style="list-style-type: none"> • Responsible for undertaking notification as defined in this PIRMP • Responsible for authorising the PIRMP and all subsequent updates • Responsible for arranging testing and updating of the PIRMP

EMERGENCY PHONE NUMBERS - EXTERNAL		
EMERGENCY SERVICES		
Fire Brigade	000	
Police	000	
Ambulance	000	
State Emergency Services	13 25 00 or 4931 3222 (Metford)	
Poisons Information Services	13 11 26	
UTILITIES		
Water - Hunter Water Australia	1300 657 657	
Electricity - Energy Australia	13 13 88 (24hr emergency - Ausgrid)	
Gas – AGL	131 909 (Emergency – Jemena Gas)	
MEDICAL SERVICES		
Maitland Hospital	(02) 4087 1000	
Kurri Kurri Hospital	(02) 4936 3200	
ENVIRONMENTAL		
Environment Protection Authority (EPA)	131 555	
NSW Department of Environment & Climate change - DECC		
Veolia (liquid waste contractor)	132 955 Rebecca 0408 344 391	
NEIGHBOURING BUSINESS		
Hill Top Timbers and Rural Supplies	0497 214 175	
Puma Kurri Kurri	4937 4101	
Subway Heddon Greta	4937 3815	
Red Rooster	4937 1595	
AD MEATS CONTACTS		
Name	Position	Contact Details
Mr Robert Gill	Managing Director	0418 635 237
Mr Paul Wilson	Wholesale Manager	0438 291 906
Mrs Lee Jones	Administration Manager	0438 371 644
Mr Robert Moore	Maintenance Manager	0438 291 907
Mr Brad Marzato	Production Manager	0438 385 545
Mr Matthew Brooks	QA Manager	0413 394 772
Mr Scott McGrath	Load out Supervisor	0411 364 866
Mr Robert Moore	Maintenance Manager	0459 951 303

5. COMMUNITY NOTIFICATION

Notification of the nearby residents is an important aspect of the Plan to ensure that they are safe and kept informed throughout the management of the pollution incident.

5.1 Who will be notified?

All community stakeholders that may be affected by an incident will be notified. These include:

- Neighbouring residential property owners
- Neighbouring commercial properties
- General public within the vicinity of the site, including pedestrians and motorists

Contact details for neighbouring commercial properties are **listed on page 9**

5.2 When will the Community be notified?

The type of community notification will depend on the type of incident, its magnitude, potential for harm, appropriate management actions, duration of remediation's actions.

If an incident presents a significant risk of causing material harm to persons, property, and/or the environment to an area that is not trivial, any community stakeholder within these areas will be notified at the earliest convenience.

5.3 How will the Community be notified?

When it has been established that any community stakeholder is at risk from a spill that has the potential to cause material harm the following process will be implemented:

1. Community stakeholders will be contacted immediately after the relevant authorities have been contacted by telephone (or face to face if this is not possible).
2. Stakeholders will be advised of recommended actions that can be taken to prevent or minimise material harm (e.g, evacuate area, shut all doors and windows).
3. After the spill has been contained and managed by key personnel and authorities subsequent communication will be undertaken by Paul Wilson and relevant environmental/health advisors. These may include:
 - Follow up telephone calls and/or face to face contact
 - Meetings with stakeholders
 - Written correspondence containing updates in regards to safety and environmental concerns associated with the pollution incident

Paul Wilson has the responsibility for ensuring all residents are contacted and kept advised. This person is also to act as the AD Meats contact for any resident communications in regards to the incident.

Information to be provided to the community will include the following;

- That an incident has occurred and what it is;
- Potential impacts to;
- Advice or recommendations based on the incident type and scale;
- Site contact details; and
- Communication protocols

Paul Wilson will liaise with the Local Authority/Council to communicate with the residents.

The method to be used for this communication will be (in this order):

1. Telephone each resident, door knocking and posting details on the AD Meats website
2. Use of letterbox drops to provide more detailed information

5.4 Communication with the Media

Only Paul Wilson has the authority to communicate with the media in regards to any environmental (or other) incidents.

No member of the media or members of the community will be allowed to enter the site in an emergency. AD Meats Management has the authority and responsibility to ensure that this requirement is adhered to.

6. Environmental Hazards/Inventory of Pollutants

The potential chemical hazards which have been identified for AD Meats have the relevant Material Safety Data Sheets as required by work, health and safety regulations. These are located secured Chemical Storage Area and these chemicals are approved for the use in the food industry.

Pesticides used and stored onsite all have relevant Material Safety Data Sheet. They are stored in a secured chemical storage area in small quantities. Only trained personnel have access and use these pesticides. The following is a registrar of pesticides

Product	Use	Quantity
Bromakil	Grain bait for rats/mice	15kg drum
Tomcat II	All weather blox rodenticide for rats/mice	8kg drum
Bayer Quick bait	Fly bait granules	2kg x 4 buckets
Round up-Biactive	Herbicide	20ltr drum
Prolong	Fly and litter beetle insecticide	10 x 100g sachets
Bayer Cislin 25	Professional insecticide	1 x 5L
Bar Mac	Scuttle Cockroach Gel	1 x 30gm syringe
Coopex Insecticidal dusting powder	Insecticide	1 x 20kg
Envirosafe	Fly Attraction	36 sachets

In addition to these chemicals hazards, the following are other hazards that could impact on the environment:

- Discharge of untreated water due to failure of the on-site treatment plant

A number of waste water streams are generated at the site, including;

- Wash water from cleaning the plant
- Wash water from production process
- Wash water from stock yards and livestock

Water from these areas are treated through the water treatment plant and irrigated

7. PRE-EMPTIVE MANAGEMENT

The following are the actions and equipment that have been implemented to prevent any pollution incident and/or minimise the impact of the incident.

1. Spill kit, personnel protective equipment and firefighting equipment locations are in the appropriately designated areas.
2. Bunding for chemical and fuel storage containers.
3. All chemical and liquid materials that have the potential to cause environmental pollution are located in a secure designated bunded areas, these chemicals are only kept on site in small quantities.
4. If the site is required to be evacuated as a result of a pollution event, evacuation procedures and muster points are detailed in the Emergency Preparedness Response Plan.

An important component of AD Meats actions to prevent the potential for an environmental incident to occur and/or reduce the impacts should such an incident occur is to utilise the following:

1. That provision of equipment should be focused around minimising the risk of harm to people and the environment as result of a pollution incident, and for containing or controlling a pollution incident
2. Implementation of Emergency Response Plan
3. Provision of appropriate and sufficient Personnel Protective Equipment
4. Onsite inductions for employees, contractors and suppliers
5. Staff are trained in managing hazards that could result in an environmental incident as well as managing such an incident
6. Regular environmental inspections

8. TRAINING AND TESTING

Ensuring all AD Meats staff and contractors are aware of both their responsibilities and protecting the environment as well as responding correctly to any incident is important. To achieve these objectives training in the PIRMP will occur via the following processes:

1. All staff and contractors working at the site would be briefed on the PIRMP as part of their induction and briefing on emergency procedures
2. PIRMP training would occur as part of regularly scheduled maintenance toolbox talks

The induction program would include details as to the AD Meat's environmental commitments, preventing pollution events and reporting of incidents. In addition, procedures to be followed to report and during an environmental incident would be detailed.

Additional scheduled training would be undertaken should a change in the contents of the PIRMP be made and/or following the outcomes of a review into the causation and responses to an environmental incident.

The testing of the PIRMP will be undertaken to check that the information is accurate and current that the plan is capable of being implemented in a workplace and effective manner. Testing shall be undertaken in the following ways.

The PIRMP will be tested by assessing and reviewing it and making any necessary changes as identified. Testing is taken to be combination of a desktop review and environmental emergency drill procedure. Testing will include all components of the plan, including training requirements.

The objective of testing is to assess whether the information included in the PIRMP is accurate and up to date the PIRMP is capable of being implemented in a workable and effective manner.

Testing of the Plan will be integrated into other emergency and incident testing and training programs where possible.

This PIRMP will be updated depending on the results and outcomes of the testing procedures (as described above) as well as following reviews of any environmental incident. A review of the PIRMP will occur every 12 months commencing from the date of authorisation by AD Meats. Contact details in this document must be kept current at all times.

9. RISK ANALYSIS

Description	The Risk	What can happen (event)	Contributing circumstances	What can happen? (circumstances)	Operational Controls	Probability	Consequences	Risk Ranking
Chemical Spill (small volume stored onsite)	Escape to the environment	Broken storage container	Poor handling or faulty containers	Escape to the environment	Chemicals are stored in a secured chemical storage area with bunding. Possible leak is diverted into the waste water treatment system	C	5	LOW
Pesticide spill	Escape to the environment	Broken storage container	Poor handling or faulty packaging	Escape to the environment	Pesticides are stored in secured area and small quantities at any given time. Possible leak of pesticide concentrate is diverted into the waste water treatment system	D	5	LOW
Fuels and oils spill	1. Fire 2. Escape to the environment	1.Broken or incorrectly sealed container 2.Broken or spillage of container	1.Come in contact with naked flame 2.Poor handling	1.Potential fire 2.Spillage into bunded area	1.Correct storage of fuel and oil, Spill Kits, Fire Extinguishers 2. Possible leak of fuel or oil concentrate is diverted into the waste water treatment system	C	5	LOW
Waste Water	Surface water contamination	Contaminated water off site	Excessive rainfall, Broken pipes, System breakdown	Untreated waste water can enter water ways	Irrigation of treated water to be maintained at or under maximum operational level, Bunding, maintenance, Inspection and monitoring, Cease of production in the event of a leak	D	4	LOW

10. RISK ASSESSMENT MATRIX

The following risk assessment matrix (table 1.) was used to determine the risk of each environmental hazard at AD Meats.

Table

1 – Risk Assessment Matrix

CONSEQUENCES	PROBABILITY					
	A	B	C	D	E	
	1 High	High	High	High	High	Medium
	2 High	High	High	Medium	Medium	Medium
	3 High	High	Medium	Medium	Low	Low
	4 Medium	Medium	Medium	Low	Low	Low
	5 Medium	Low	Low	Low	Low	Low

Explanatory notes on the selection of the consequences and probability for each issued are presented in table 2.

Table 2 – Risk Matrix Explanation

PROBABILITY			CONSEQUENCES			
A	Almost Certain	Expected to occur, quite common	1	Major	<ul style="list-style-type: none"> Major environmental harm. Eg. Major pollution incident causing significant damage or potential to health or the environment Fines and prosecution likely 	
B	Likely	Will probably occur, has happened	2	Significant	<ul style="list-style-type: none"> Long term or serious environmental damage Numerous complaints Potential for prosecution Loss of reputation 	
C	Possible	Might occur at some time	3	Moderate	<ul style="list-style-type: none"> Moderate environmental impact Will cause complaints Possible fines 	
D	Unlikely	Could occur at some time although unlikely	4	Minor	<ul style="list-style-type: none"> Minimal environmental harm Potential for complaints Fine unlikely 	
E	Rare	Might occur at some time in exceptional circumstances	5	Insignificant	<ul style="list-style-type: none"> Little or no environmental harm Little potential for fines or complaints 	