

MSM Milling
Manildra Stock Feeds
Manildra Packing

Pollution Incident Response Management
Plan (v2)

Approved	James Karbowiak – Site Manager	Approved	Peter Jones - CFO	Approved	Peter Moes – GM Operations
Doc Owner	James Karbowiak – Site Manager	Eff Date	02/11/2018	Rev. Date	02/11/2019
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1.0 Introduction

MSM Milling, Manildra Packing and Manildra Stockfeed, are all businesses that operate on the MSM Milling site at Lot 1, Dederang Street, Manildra, NSW 2865. For the purposes of this PIRMP, all businesses will be referred to as MSM.

The plan incorporates the requirement of the Protection of the Environment Legislation Amendment Act 2011 (POELO Act) to prepare and implement a pollution incident response management plan. As a holder of an Environment Protection Licence (EPL No. 13228), MSM are required to prepare and implement a PIRMP to:

- Ensure comprehensive and timely communication about pollution incidents to staff at the premises, the EPA, other relevant authorities and people outside the facility who may be affected by the impacts of the pollution;
- Minimise and control the risk of a pollution incident at the facility by identifying risks and the development of planned actions to minimise and manage those risks; and
- Ensure 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.

This document outlines the plan for responding to pollution incidents and references the MSM Emergency Response Procedure where relevant. The Emergency Response Procedure provides the process for an initial response to emergencies such as fire, medical emergency, hazardous substance incidents / chemical spill, civil disturbance and blackout. The Emergency Commander and Wardens on site will act to control or limit the event, as well as moving people to safety where relevant and alerting emergency services or external agencies. This plan will direct the activities of the Emergency Commander in relation to Pollution Incident Management.

A written controlled copy of this plan and a copy of the Emergency Response Plan can be found in the Emergency Response Kit mounted on the front wall of the office next to the fire indication panel.

The activities licenced with the EPA for MSM are:

- Agricultural Processing

And the ancillary activities are;

- Energy Recovery
- Waste Disposal (Thermal treatment)

The Licence Details are;

Number: 13228
 Anniversary Date: 23rd December

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2.0 Description and likelihood of hazards

MSM have applied the following criteria in assessing the likelihood of certain hazards occurring;

- Almost certainly will occur:** Consequence expected to occur on a weekly basis or more frequently.
- Good chance it will occur:** Consequence expected to occur more than once in 3 months, but less than once a week.
- Likely to occur:** Consequence expected to occur more than once a year, but less than once in 3 months.
- Unlikely to occur:** Consequence expected to occur more than once in 3 years, but less than once a year
- Extremely unlikely to occur:** Consequence has not occurred and is expected to occur less than once in 3 years.

MSM have identified the following potential hazards associated with the licenced activities being undertaken at the premises and likelihood of such events which could be injurious to human health or the environment.

Hazard: Poor local air amenity due to odour

Likelihood: Good chance it will occur

Control Actions: Daily reporting on Bio filter key control points, Thermal imaging of bio filter bed as required, active water management of bed, process air treatment equipment (cyclones, ducting of manufacturing process air to wet scrubbers and bio filter), preventative maintenance programs, wastewater treatment equipment and management procedures, staff inspections, reporting of complaints.

Other potential actions: not identified

Potential pollutant quantity: not readily quantified

Conditions / events that could increase likelihood: wastewater treatment disruption, degradation / composting of bio filter bed, extended shutdown of plant (in excess of 24 hours, affect biomass balance).

Hazard: Dust explosion from organic dust

Likelihood: Unlikely to occur

Control Actions: process air treatment equipment (cyclones, ducting of manufacturing process air to wet scrubbers and biofilter), preventative maintenance programs, smoking restrictions, cleaning programs, general awareness training, engineering controls of potential ignition sources, deluge systems, spark arresting systems, Explosion venting on high risk equipment, (i.e. dust collectors, cyclones)

Other potential actions: Not identified.

Potential pollutant quantity: not readily quantified.

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Conditions / events that could increase likelihood: fire, internal process dust leaks, breach of smoking rules.

Hazard: Poor local air quality from dust emissions

Likelihood: Unlikely to occur

Control Actions: process air treatment equipment (cyclones, ducting of manufacturing process air to wet scrubbers and biofilter), preventative maintenance programs.

Other potential actions: not identified

Potential pollutant quantity: not readily quantified.

Conditions / events that could increase likelihood: not identified

Hazard: Stormwater pollution from Canola Oil spill

Likelihood: Extremely unlikely to occur

Control Actions: Tanker truck Load/Unload is codified in documented procedures. Tank storage has bund, Building has bund and drain to trade waste, Trade waste has bund, stormwater retention dam with baffle fitted and floating absorbent socks, gross pollutant trap, spill control equipment (drain covers and absorbent), planned inspections and daily reporting, pit level switch alarms on SCADA and inspected, Preventative maintenance program.

Other potential actions: utilise waste contractor with vacuum tanker.

Conditions / events that could increase likelihood: excessive rain, fire, multiple tank failures.

Hazard: Canola Oil spill beyond boundary

Likelihood: Extremely unlikely to occur

Control Actions: Tanker truck Load/Unload is codified in documented procedures, Tank storage has bund and security access walls to eliminate tampering, Building has bund and drain to trade waste, Trade waste has bund, stormwater retention dam with baffle fitted and absorbent socks, gross pollutant trap, spill control equipment (drain covers and absorbent), planned inspections, pit level switch alarms on SCADA and inspected, Preventative maintenance program. CCTV monitoring.

Other potential actions: utilise waste contractor with vacuum tanker, recover contaminated material utilising civil contractors.

Conditions / events that could increase likelihood: excessive rain, fire, multiple tank failures, external tampering.

Hazard: Stormwater pollution from spill of raw wastewater

Likelihood: Extremely Unlikely to occur

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Control Actions: Tanker truck Load/Unload codified in documented loading procedures, Tank storage has bund, Building has bund and drain to trade waste, Trade waste has bund, stormwater retention dam, spill control equipment (drain covers and absorbent), planned inspections, pit level switch alarms on SCADA, Preventative maintenance program.

Potential pollutant quantity: average generation of approximately 5-8KL per day

Other potential actions: utilise waste contractor with vacuum tanker.

Conditions / events that could increase likelihood: rain, fire, blackout

Hazard: Stormwater pollution from discharge of poorly treated effluent.

Likelihood: Extremely Unlikely to occur

Control Actions: Treatment system has bund, wastewater treatment equipment and management procedures, staff inspections, preventative maintenance programs.

Other potential actions: Utilise waste contractor with vacuum tanker, cease wastewater generation.

Potential pollutant quantity: average generation of approximately 5-8 KL per day.

Conditions / events that could increase likelihood: rain, fire.

Hazard: Discharges to air (Exhaust stack from biomass boiler)

Likelihood: Unlikely to occur

Control Actions: Continuous Visual monitoring of the smoke emissions, escalation and shut down as per Biomass Boiler Stack Monitoring Procedure.

Other potential actions: air quality monitoring as per EPA licence conditions.

Potential pollutant quantity: Visible or quantitative limits exceeded.

Conditions / events that could increase likelihood: operational failure, blackout.

3.0 Pre-emptive actions to be taken

Minimisation and prevention of harm from pollution incidents arising from the activities carried out at the MSM facility include:

- Maintenance schedules for equipment and testing;
- Personal protective equipment;
- Induction training for areas relevant to position;
- Bunding surrounds all storage tanks;
- Floating booms and capture plate on the retention pond; and
- Spill response kits.

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4.0 Inventory of pollutants

The Dangerous Goods manifest in Appendix I provides:

- Maximum quantities of dangerous goods;
- Storage type;
- Environmental hazard associated with the material;
- Quantity typically stored;
- Storage location; and
- Control Measure.

5.0 Safety Equipment

Safety equipment for pollution incidents is described in:

1. Appendix II: The Site Essential Service Map provides locations of Dangerous Goods storage, Evacuation area, Spill kits, SDS locations; and Main electrical isolation points. (Refer to the ERP for the Site Essential Services Map including fire fighting equipment)
2. Appendix III: Personal Protective Equipment (PPE) to be provided and used when attending to clean up of spilled chemicals;
3. SDS for materials on site are provided in the following locations:
 - Hardcopies in the Main Office;
 - Hardcopies in the Maintenance Workshop; and

6.0 Contact Details

Contact details are provided for relevant people and organisations in the following locations;

- Appendix IV provides the 24-Hour Company Emergency Contact List for internal notification;
- Appendix V provides the contact numbers relevant to MSM for notification as required under the Act in the event of a pollution incident.

The relevant information about a pollution incident required under section 148 of the environmental protection act consists of the following:

- a. The time, date, nature, duration and location of the incident,
- b. The location of the place where pollution is occurring or is likely to occur,
- c. The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- d. The circumstances in which the incident occurred (including the cause of the incident, if known),
- e. The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
- f. Other information prescribed by the regulations.

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The person notifying will give the relevant information only if it is known at the time. If the information required is not known to the notifier when the initial notification is made but becomes known afterwards, that information must be updated immediately after it becomes known.

If the incident presents an immediate threat to human health or property;

Call: 0 000

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, responsible for controlling and containing incidents.

Note: If ringing services from an internal line '0' must precede the number to gain outside line access.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities listed in Appendix V in the required order.

7.0 Communicating with neighbours and the local community

The MSM facility lies within an area zoned for industrial purposes and the site is adjacent to farmland, residential properties and public use areas e.g. roads and rail.

In the event of any pollution incident, the Emergency Commander, Emergency Services and statutory agencies will determine if neighbouring properties are required to be notified.

The method of notification will be by telephone. Neighbouring property phone numbers are provided in Appendix VI. Only authorised company officers will speak to the media or authorise postings on company social media accounts. No employees are authorised to post on social media including making any reference to MSM or its officers and operations.

8.0 Minimising harm to persons on the premises

Emergency Response protocols are outlined the Emergency Response Plan. The purpose of the ERP document is to describe the actions to be taken to prepare for and to act in the event of an incident or emergency at MSM Milling Manildra. Following the protocols outlined in the ERP will assure the safety of all persons on the premises. The ERP includes;

- Emergency Activation;
- Escalation;
- Evacuation and mustering;
- Communication;
- Training; and
- Incident investigation.

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9.0 Maps

Appendix VII provides a location map of MSM Milling. The map documents neighbouring properties and nearest watercourses along with the drainage line from the site to the water course.

Appendix II provides a series of site map of MSM which identifies the location of:

- Dangerous Goods storage;
- Evacuation area;
- Fire Fighting Equipment
- Spill kits;
- SDS locations; and
- Main electrical isolation points.

The SDS for all Dangerous Goods can also be found at;

<S:\Manildra Operating Procedures\02 Quality\SDS\Dangerous Goods Manifest SDS>

10.0 Pollution Incident Response

Actions to be taken by the licensee in the event of a pollution incident are specified in the ERP and listed below.

Employees are instructed to report all incidents and near misses to their Team Leader or a responsible manager on site. Such incidents also include those of an Environmental nature.

There is 24-hour site contact available through the Control room / administration office. Contact during initial stages of any emergency / crisis can be directed to this number.

Call: 0 02 6364 5999.

Note: If ringing services from an internal line '0' must precede the number to gain outside line access.

On discovery of an incident or emergency, the worker is to decide if it can be corrected immediately or if it needs to be escalated to the Emergency Commander. If it can be corrected quickly, the incident should be brought under control and an incident report should be completed with the Area Team Leader. If it cannot be brought under control, the Refinery Team Leader is to be contacted to activate this Emergency Response Plan.

On escalation, the Refinery Team Leader assumes the role of Emergency Commander. The Emergency Commander or their delegate is to investigate the emergency and determine which Emergency Level they believe it to be. This classification will drive the actions of the Emergency Commander.

The three Emergency Levels are defined below:

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Level 1 – Minor Incident

This is an incident that is under control of the worker who identifies the incident, or the Area Team Leader. This is a minor incident with limited risk of escalation that is within the ability of those attending the incident to control.

- Example – Minor spill that can be contained with a local spill kit and local resources.

Level 2 - Facility Emergency

This is an incident that requires management by an Emergency Commander. This is an Emergency of scale, requiring those resources at the disposal of the Emergency Commander.

- Example – Any emergency that requires mustering the Facility to an Emergency Evacuation Point.

Level 3 - Offsite Emergency or Emergency Services Required

This is an Emergency that requires external and/or Emergency Services to take control. This is an emergency of a scale that is outside the control or training of Facility resources. Emergency Services and/or external agencies are required to bring the emergency under control.

Example – A release that requires Fire Brigade assistance to control, such as a gas leak from the LPG tank.

This process of identification and escalation is followed regardless of the nature of the incident including environmental, safety or property incidents.

Externally, there is a toll-free number for complaints. The number is 1800 750 034. This automatically generates an e-mail that is sent to a central address at MSM.

If an environmental incident occurs that is potentially a notifiable pollution event it is escalated to the Site Manager, or in his absence, GM – Operations or another senior manager on site. The Site Manager or GM – Operations consults any relevant site staff to assess if a notifiable pollution incident has occurred. A notifiable event is described in Procedure 09-020 *“External Notification of Environmental Harm.”*

If it is determined that a notifiable environmental incident has occurred, the Site Manager or the GM - Operations will immediately notify the Environment Protection Authority and any other relevant parties. In their absence and after attempts have been made to contact them, the next most senior manager who can be contacted will take the decision on the nature of the event and if required notify the relevant authorities required under the Act as outlined in Appendix V.

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11.0 Staff training

MSM run a comprehensive training program to ensure all staff on site are prepared in the event of any emergency including a pollution incident. Training records are available through HR and such records document the names of staff and the specific training they have undertaken, including the date of training or retraining.

The implementation and successful activation of this plan in the event of an environmental incident requires an overhead of training. All people working on the site including contractors must be formally inducted. All visitors to the site including truck drivers must also be made aware of the basic requirements for evacuation as detailed in this plan.

The induction and awareness must include information and validation of understanding on the following;

1. Emergency Evacuation Point,
2. Raising an alarm for an incident (including Environmental)
3. Alarm response (Including no vehicle movements),
4. Emergency muster routes.

The induction program includes instruction about environmental commitments, preventing pollution events and reporting of incidents. These are implemented as required. All employees undertake induction refresher training every twelve months to maintain a high level of awareness of the emergency procedures.

In addition, an oil spill training tool box talk is given regularly in each department.

The pollution incident response component of the plan will be tested yearly, either by desktop simulation or pollution drills. Plan testing is the responsibility of the Technical Manger. Records are kept of the drills and testing.

All events that trigger this Emergency Plan/PIRMP require an incident Investigation. At the first available opportunity after the site has been declared safe and within 24hours of the incident a debrief is to be held involving the members of the Emergency Response Team and Wardens. The debrief form is in Appendix 10 of the ERP. Once the team has completed the debrief the team will debrief site management. Post the incident the Emergency Commander in consultation with the Site Manager will determine the requirements and those responsible for the Incident Investigation. PIRMP is part of MSM's controlled document system.

Appendix I – Dangerous Good Manifest.

Approved	James Karbowskiak – Site Manager	Approved	Peter Jones - CFO	Approved	Peter Moes – GM Operations
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	Item	Health Hazards (Note 1)	Environmental Hazards
1	Canola Oil	Not classified as hazardous	Could pollute surface waters if spills are not contained
2	32% Caustic Soda	R35: Causes severe burns R41: Risk of severe damage to eyes	Material is alkaline and may raise the pH of surface waters
3	85% Phosphoric Acid	R34: Causes burns R41: Risk of severe damage to eyes	Material is acidic and may lower the pH of surface waters
4	Propane	R12 : Extremely flammable	None identified
5	Butane	R12 : Extremely flammable	None identified
6	Canola Seed	Not classified as hazardous	Organic seed – none identified
7	Canola Meal	Not classified as hazardous for transport. Classified as Dangerous for storage >10MT	Organic material – none identified
8	Magnesium Oxide	Not classified as Hazardous	None Identified
9	Flossy Fine Salt	Not classified as Hazardous	None Identified
10	Sodium Bicarbonate	Not classified as Hazardous	Unlikely to adversely affect the environment
11	Calcium Propionate “Kemira”	Not classified as Hazardous	None Identified
12	Lime	Not classified as hazardous	None Identified
13	DDG - Syrup	Not classified as hazardous	No Environmental effect
14	LacGro Gold Premix	R36: Irritating to eyes	Material is slightly acidic and may lower pH of surface waters.
15	Salcurb RM	Acute Toxicity: Cat 3 Carcinogenetic: Cat 1 R36: Irritating to eyes Sensitization -Skin Category 1	Material is acidic and may lower the pH of surface waters
16	12.5% Sodium Hypo- chlorite Solution	R31 – Contact with Acids liberates Gas R34 – Causes Burns R50 – Very Toxic to Aquatic organisms	Very toxic

Note 1: As defined in Appendix 1 of the NATIONAL CODE OF PRACTICE FOR THE LABELLING OF WORKPLACE SUBSTANCES [NOHSC: 2012(1994)]

Below is outlined an inventory of potential pollutants at the premises, the quantity of each potential pollutant, the location of each potential pollutant and the control measures used

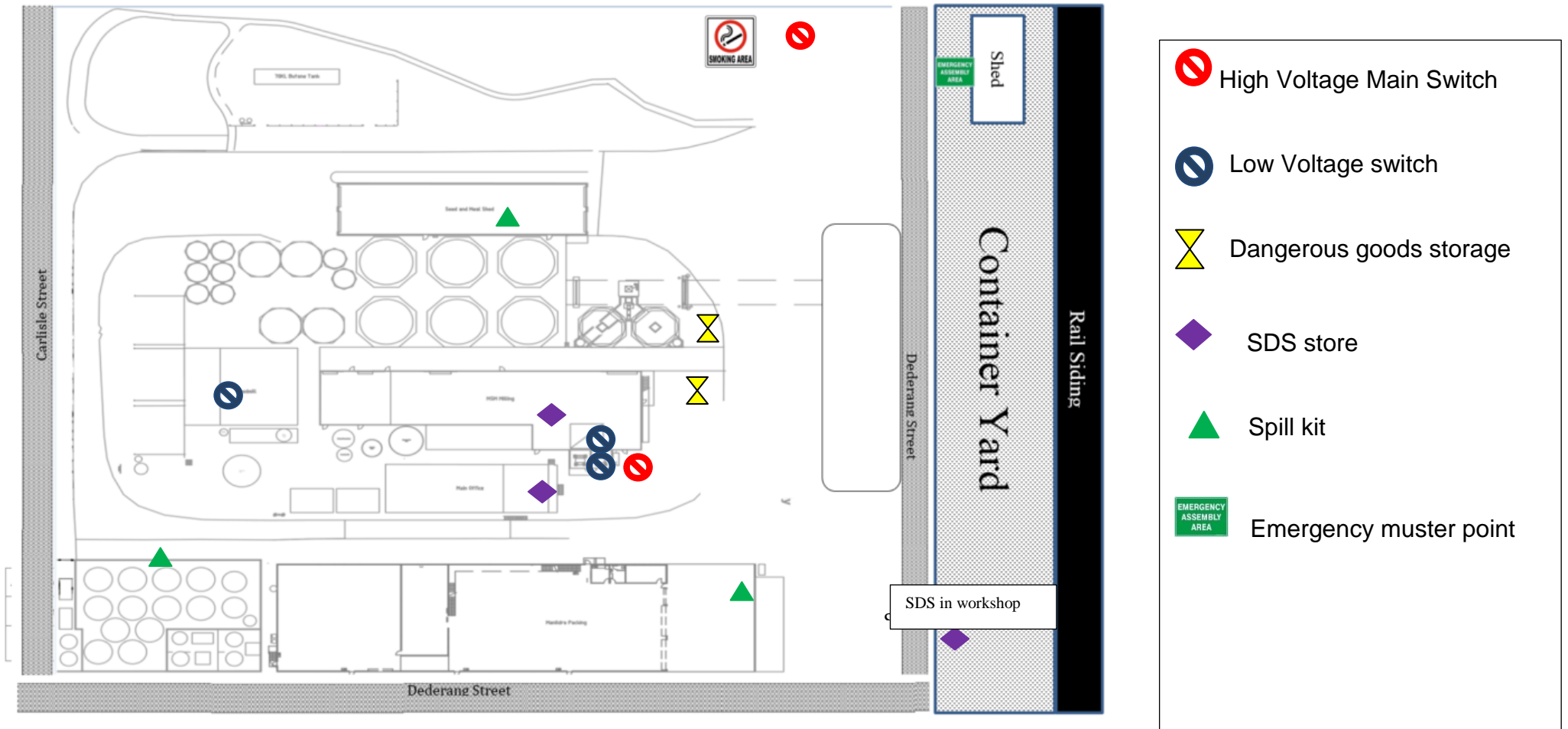
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to minimise the risk to human health and the environment. As well as containing or controlling the impacts of a pollution incident.

	Item	Maximum Quantity	Location	Control Measures
1	Canola Oil	2,300 tonnes	Tank Farm	Tank Farm Bund
2	Canola Oil	20 tonnes	In process in the Refinery	Building Bunding
3	32% Caustic Soda	1,500 litres	Refinery	Has bund Pallet in building bund
4	32% Caustic Soda	10,000 Litres	Material Store – Shed	Specialised approved banded storage container.
5	85% Phosphoric Acid	1,500 litres	Refinery	Has bund Pallet in building bund
6	85% Phosphoric Acid	6,000 Litres	Material Store - Shed	Specialised approved banded storage container.
7	12.5% Sodium Hypochlorite Solution	1,000 Litres	Refinery	Has bund Pallet in building bund
8	12.5% Sodium Hypochlorite Solution	2,000 Litres	Material Store - Shed	Specialised approved banded storage container.
9	Salcurb RM E	6,000 Litres	Material Store – Shed	Specialised approved banded storage container.
10	Salcurb RM E	1,000 Litres	Refinery	Specialised approved banded storage tray.
11	Propane	750 litres	Above ground tanks	Isolated location
12	Butane	59,000 litres	Above ground tank	Isolated location
13	Untreated/Treated waste water	40,000 litres	Tank Farm	Tank Farm has bund
14	Magnesium Oxide	3,000 Kilos	In Process in feed mill	Stored in process building
15	Flossy Fine Salt	3,000 Kilos	In process in feed mill	Stored in process building
16	Sodium Bicarbonate	3,000 Kilos	In process in feed mill	Stored in Process building
17	Calcium Propionate “Kemira”	3,000 Kilos	In process in the Feed Mill	Stored in Process Building
18	Lime	20,000 Kilos	In Process in the feed mill	Stored in bulk in process building
19	DDG - Syrup	20,000 Kilos	Tank Farm	Tank farm bund
20	LacGro Gold Premix	2,000 Kilos	In process in Feed mill	Stored in Process Building.

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Appendix II: Site Map of essential services (refer to ERP for Fire equipment)



- High Voltage Main Switch
- Low Voltage switch
- Dangerous goods storage
- SDS store
- Spill kit
- Emergency muster point

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Appendix III: Personal Protective Equipment (PPE) to be provided and used when attending to clean up of spilled chemicals

Personal Protective Equipment to be provided when pollution spill occurs

- Single use overalls
- Knee high chemical resistant boots (Wellingtons)
- Chemical resistant gauntlet gloves
- Chemical Glasses/goggles
- 250mL minimum eyewash solution (full and ready for use)

Oil Spill Kit Contents

- Super silt sock 1.2m
- 20 x absorbent pads
- 15kg optisorb
- Super-size brush and pan
- PVC gloves
- Disposal bags
- 2 x large absorbent booms

Appendix IV: 24-Hour Company Emergency Contact List for internal notification

The following key personnel need to be informed as soon as practicable:

Name	Position	Mobile Number
James Karbowiak	Site Manager	0 0422 629 434
Peter Moes	General Manager - Operations	0 0407 043 487
Charles Aldersey	General Manager – Commercial	0 0419 156 790
Damien Ivers	Production Manager	0 0428 240 212
Kaushal Pathirana	Technical Manager	0 0437 201 008
Aaron Huppatz	Maintenance Manager	0 0427 645 486

It is the responsibility of the Site Manager or his delegate to inform the Business Directors as soon as practicable.

Note: If ringing services from an internal line '0' must precede the number to gain outside line access

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Appendix V: Contact numbers relevant to MSM for notification as required under the Act in the event of a pollution incident.

If it is determined that a notifiable environmental incident has occurred, the Site Manager or the GM - Operations will immediately notify the Environment Protection Authority and any other relevant parties.

In the case of an environmental incident the following external contacts must be contacted in this order:

National Emergency Number:	0 000 (NSW Fire & Rescue)
The 24-hour Hotline number for the EPA is:	0 13 15 55
The number for the local EPA office is:	0 (02) 6332 7600
NSW Ministry of Health Local Health District:	0 (02) 6369 3000 (Orange)
	0 (02) 6392 3300 (Molong)
Work Cover NSW:	0 13 10 50
Cabonne Council:	0 (02) 6368 2104

Note: If ringing services from an internal line '0' must precede the number to gain outside line access

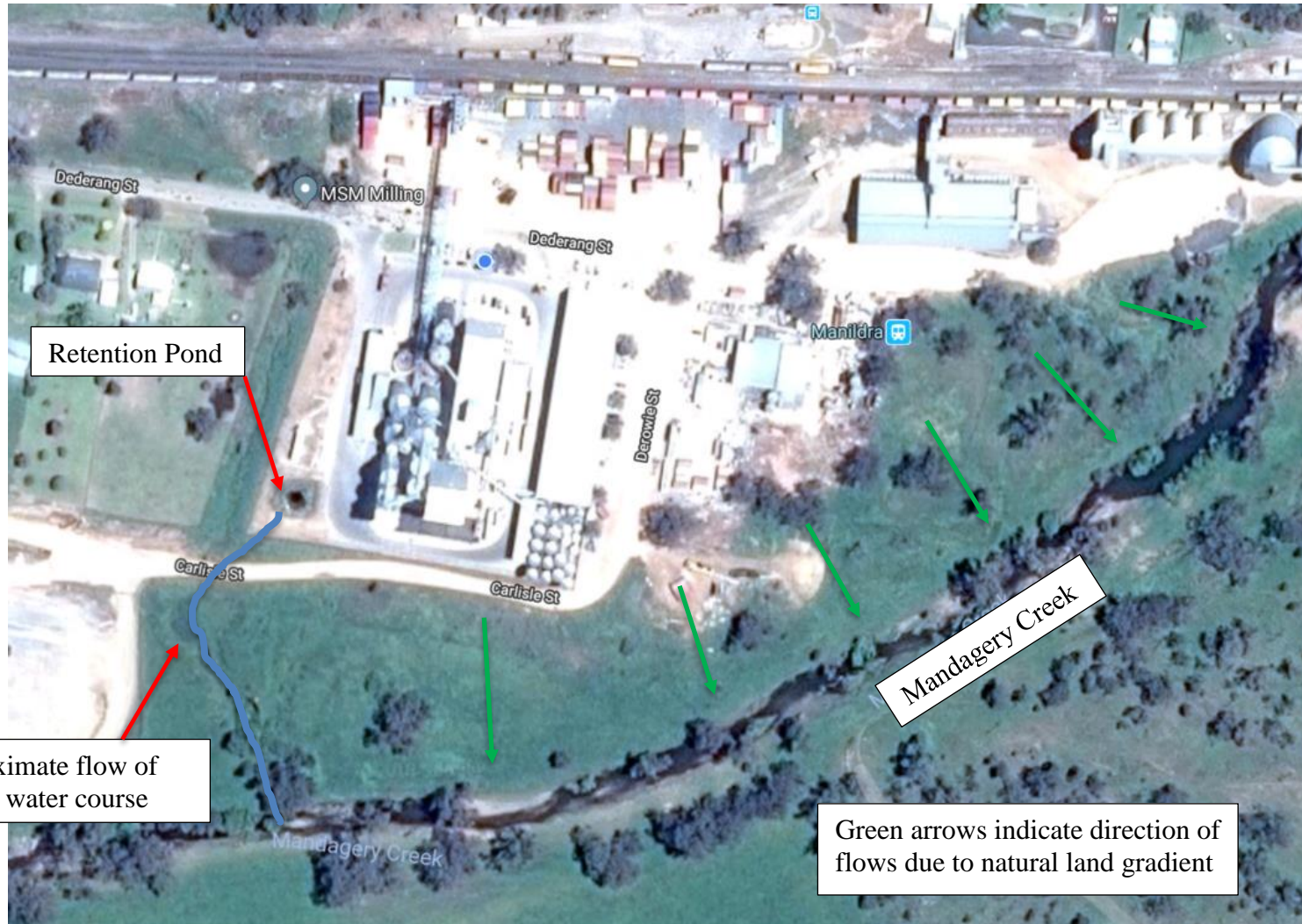
Appendix VI: Neighbouring property contact details

Name	Position	Phone Number
DP Williamson	West Boundary – 20 Dederang Street	0 (02) 63 645 308
M. J. Bennett	West Boundary – Dederang Street	0 (02) 63 645 130
Manildra Group	West Boundary – 18 Dederang Street	0 (02) 63 645 003
G. Wood	South Boundary	0 (02) 63 645 363
G. Wood	South Boundary	0 0409 604 959
Grain Corp	North Boundary	0 (02) 63 645 363

Note: If ringing services from an internal line '0' must precede the number to gain outside line access

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Appendix VII: Location of water courses



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Test Records:

Date	Co-Ordinator	Nature of test/ updated
01/08/12	Greg Lynch	Review and test of procedure
12/08/14	Anthony Ward	Review of PIRMP including pellet mill
14/08/14	Anthony Ward	Complaint line tested based on odour complaint. No. 1800 750 034
09/10/15	Anthony Ward	Reviewed and updated
21/01/16	Anthony Ward	Hazards and remediation measures reviewed
4/7/16	Anthony Ward	Regulatory test – including complaint line
20/1/18	Anthony Ward	Review of PIRMP – for reissue
20/1/18	Anthony Ward	Regulatory test – Test Complaint line
17/9/18	James Karbowski	Biomass Boiler test monitoring inclusions

Approved	Anthony Ward (GM -Operations)	Approved	Peter Moes –(GM –Finance)	Approved	Charlie Aldersey (GM – Commercial)
Doc Owner	Anthony Ward – GM - Operations	Eff Date	11Aug 2014	Rev. Date	25/1/19
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DOCUMENT HISTORY

Ver	Date	Pages	Name	Title/Position	Reason
1.0	11/08/14	12	A. Ward	GM-Operations	Original
1.1	09/10/15	12	G. Lynch	Technical Advisor	Regulatory review
1.2	21/01/16	12	A.Ward	GM-Operations	Review of Potential Hazards
1.3	2/2/17	12	A.Ward	GM – Operations	Regulatory review – contact update
1.4	20/1/18	13	A.Ward	GM – Operations	Review and update of information.
1.5	02/11/18	Various	J.Karbowiak	Site Manager	Licence details amendments, Contact Update, Biomass Boiler required changes, Changes to align with ERP. Changes to bring in line with legislative requiriemens.

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