AUSCOL
THE COOKING OIL UPCYCLERS.

Pollution Incident Response Management Plan (PIRMP)

Riverstone Terminal - New South Wales

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1. Purpose and Background

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the Protection of the Environment Operations Act 1997 (POEO Act) and associated Protection of the Environment Legislation Amendment Act 2011 (POELA Act) for licensed facilities.

Under GrainCorp's Emergency Management System, detailed emergency response procedure is already in place for the classification and management of incidents, across GrainCorp operational sites. Under the provisions of Section 71 of the Protection of the Environment Operations (General) Regulation 2022, to allow for the integration of requirements into existing plans in respect to pollution incident response, requirements under POEO legislation have been integrated into these existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans and associated procedure. It also details additional supplementary site-specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

2. Scope

This PIRMP covers GrainCorp's Auscol (Riverstone) Terminal located at 148 RIVERSTONE PDE, RIVERSTONE, NSW, 2765. This plan applies to all activities, products, and services on the site over which Auscol's has operational control.

3. Legislative Requirements

Specific legislative requirements for the development and implementation of this PIRMP are provided below.

- Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act)
- Protection of the Environment Operations (General) Regulation 2022
- Environment Protection License (EPL) 2550

In summary:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation 2022 (clause 71).
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation 2022 (clause 75).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

4. Terms and Definitions

4.1. Definition of a pollution incident

The dictionary of the POEO Act defines pollution as either 'water pollution, 'air pollution', 'noise pollution' or 'land pollution'.

A *pollution incident* means an incident or set of circumstances during or as a consequence of which there 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 a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

4.2. Definition of Clean-up Action

In relation to a pollution incident, *clean-up action* may include:

a) *action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and*
b) *ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and*
c) *preparing and carrying out a remedial plan of action.*

It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

4.3. Abbreviations

Table 1 - Terms and definitions relevant to the PIRMP

Abbreviation	Explanation
EPA	Environment Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
POELA Act	Protection of the Environment Legislation Amendment Act 2011
CLM Act	Contaminated Land Management Act 1997
EPL	Environment Protection License
ERP	Emergency Response Plan
EMS	Environmental Management System

5. Notification of a Pollution Incident

5.1. What must be notified

A pollution incident is required to be immediately notified if there is a risk of 'material harm to the environment', defined under 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 or 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.*

In order to determine if an incident causes or threatens material harm to the environment (i.e. Pollution Incident) the Incident Management Classification and Escalation Process (see Annex E) must be implemented.

5.2. Responsibility to Notify

Under Section 148 of the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- The person carrying on the activity;
- An employee or agent carrying on the activity;
- An employer carrying on the activity;
- The occupier of the premises where the incident occurs.

Once determined that the incident causes or threatens material harm to the environment, notification must be given immediately, i.e., promptly and without delay, after the person becomes aware of the incident.

All GrainCorp sites follow the GrainCorp Incident Management procedure to determine the responsibilities for notifying authorities through the Notification Table and the Incident Management Classification and Escalation Process (see Annex E).

5.3. Emergency Response

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release.

If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance (phone **000**).

Considering the actual or potential material harm to the environment or human health, the PIRMP must also be immediately implemented, and other response agencies must still be contacted in order to satisfy notification obligations.

5.4. Contaminated Land

Persons whose activities have contaminated land and owners of land who become aware, or ought reasonably to be aware, that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination, if the contamination meets certain criteria. The duty to notify is a requirement under section 60 of the *Contaminated Land Management Act 1997* (CLM Act).

6. Reference Documentation

The following existing internal plans and procedure documentation underpin this PIRMP.

Table 2 - Auscol internal plans and procedures underpinning the PIRMP

Doc. No	Document	Format
	Terminal Emergency Plan	Flipchart on site
	Terminal Environmental Management Plan	Controlled document on SharePoint
	Incident Emergency Response Plans	Annex – C Flipchart on site
HSE-3-01-A01	Incident Management Classification and Escalation Process	Controlled document on SharePoint
HSE-3-01	Incident Reporting and Investigation Standard HSE-3-01	Controlled document on SharePoint

7. RIVERSTONE PIRMP

7.1. DESCRIPTION OF POTENTIAL HAZARDS AND THEIR LIKELIHOOD

An *environmental hazard* is a term for any situation or state of events which poses a threat to the surrounding environment including human health as a result of an incident. Incident types that may occur at Riverstone are detailed below:

- Spill from Tank Farm;
- Truck Spill (offsite);
- Minor chemical/ UCO spill (onsite);
- Discharge of Liquid Food Waste to stormwater;
- Uncontrolled release of emissions.

Potential hazards to human health and the environment that have been identified as a result of the above listed incidents include water pollution (including stormwater), air pollution and soil/ground pollution. Table 3 below identifies a list of foreseeable hazards that could occur on this site as a result of regular operating activities and the consequence and likelihood of each with current controls.

A risk management matrix (see Annex D) is used to score the residual risk associated with any particular hazard. The purpose of rating risk is to guide decision making on risk management and to eliminate or otherwise reduce the risk to an acceptable level.

Table 3 - Likelihood and consequences assessment of hazards around Riverstone Terminal

Hazard	Type of pollution	Potential Impact	Consequence	Likelihood	Residual Risk	Circumstances which may increase the potential of environment or health impact
Spill from tank farm	Soil & Water	Contamination of soil, ground and surface water leaking from plant (Normal storage volume is ~90t)	Extreme	Rare	**15**	• Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek) • Non-operating periods where there are limited personnel on site.
Truck spill (offsite)	Soil & Water	Contamination of soil, ground and surface water leaking from plant (Normal storage volume is ~10t)	Major	Possible	**18**	• Traffic accident (e.g., crash) • Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek)
Minor chemical/ UCO spill on site	Soil & Water	Contamination of soil, ground and surface water leaking from handling and storing product on site (Normal storage volume is ~1t)	Minor	Likely	**11**	• Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek)
	Water	Contamination of ground and surface water leaking from stormwater drains	Minor	Likely	**11**	• Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek)
Discharge of Liquid Food Waste to Stormwater	Water	Loss of potentially contaminated stormwater runoff from site due to pump and equipment failure	Minor	Unlikely	**5**	• Heavy rain event may release the contaminants offsite • Spills occurring on site simultaneously as this Hazard • Non-operating periods where there are limited personnel on site.
Uncontrolled release of emissions	Air	Degrade air quality through release of gas (boiler)	Minor	Rare	**3**	• Wind may carry the emission to sensitive receptors (neighbors) • Non-operating periods where there are limited personnel on site. • Traffic accident impacting the infrastructure on site

7.2. Pre-emptive Actions to be taken

The following table details descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or to the environment arising from activities occurring at the Riverstone Terminal.

Table 4 - Pre-emptive actions arising from activities at Riverstone Terminal

Activity / Pre-emptive Actions	Figure
Spill from tank farm • The tanks are located within a bunded area with a separate drainage system. • The tanks have level alarms set at 90% (tanks are never used at full capacity). • Bund inspections are carried out at a regular basis to validate condition of bunding. • Tanks are also tested for integrity at a regular interval.	 *Figure 1 - Bunded Tank Farm*
Truck spill (offsite) • The tanks are built to Australian Standards and tests are performed to the tank's barrels thickness. • Safety valves are installed in the tanks to prevent accidental opening of valves. • Trucks have 'Seeing Machine' (built to monitor driver fatigue) which check for impact in the event of a traffic accident – this sends an immediate email notification to management on occurrence.	 *Figure 2 - Auscol Riverstone truck*
Minor UCO/ chemical spill on site • Only minor quantities of chemicals are stored onsite and any major maintenance activities are undertaken by third party contractors off site. • Chemicals and UCO are stored with the appropriate bunding, and spill kits are located in areas where there is a potential for a spill to occur.	 *Figure 3 – Chemical bund*  *Figure 4 - Spill Kits near stormwater drain*
Discharge of Liquid Food Waste to Stormwater • As backup, the pits in the sheds have pumps and IBCs ready to be engaged in the event of failure of this system. • Regular inspections are performed to the equipment. • Regular disposal offsite is performed to minimise the volume kept on site.	 *Figure 5 - LFW backup storage equipment*

Activity / Pre-emptive Actions	Figure
Uncontrolled release of emissions • The Boiler is connected to the main gas line (no storage of gas on site). • There is a Gas Shut off point at the south side of site to be activated in the event of leaks, incidents, failures, etc.	 *Figure 6 - Gas Shut off point*

Other pre-emptive actions taken to minimise the likelihood of potential environmental hazards include:

- The implementation of a site-specific Environmental Management System (EMS);
- Onsite inductions for employees, contractors and suppliers;
- Monthly environmental inspections.

7.3. Inventory of Potential Pollutants

The main potential pollutant associated with the site activities is the Used Cooking Oil (as listed in Table 5) which can generate impacts to stormwater and soil. Total throughput capacity for the site is approximately 7,000 tonnes per annum.

Table 5 - Potential UCO pollutant

Name	Properties	Environmental Hazards
Unclassified Liquids Waste Cooking Oils (including Vegetable Oil,)	Flashpoint > 200°C	• Practically non-toxic to humans (probable lethal dose 15 g/kg) • Will float in slick on surface of water. Tends to cause agglomeration in soils reducing permeability • May destroy water birds and aquatic life including plankton, algae and fish

An inventory of all chemicals is maintained on ChemAlert, and inspections are undertaken onsite to determine actual volumes stored onsite (Table 6). There are no underground storage facilities at the Riverstone Terminal site. Chemical storage locations are detailed on Annex A.

Table 6 - Chemicals stored on site at Riverstone Terminal

	Quantity	Max Quantity
Automotive Diesel Fuel	2	30L
BL10B Truckwash	1	200L
Cherry Hospital Grade Disinfectant	2	40L
Dash	2	40L
Dy-Mark Spray Ink All Colours	5	5L
Ethyl Alcohol	4	20L
HD18 Degreaser	1	200L
Glass Cleaner	2	40L
LPG	5	150kg
Phenolphthalein Solution	1	200mL
Recycled Used Cooking Oil	Refer to stock	600T
Smik	2	40L
Sodium Hydroxide 1 Normal	2	5L
Valcomp 68	4	80L
WD-40 Aerosol	1	200mL
White Knight Fiddly Bits Primer Undercoat Aerosol	5	1lt18

7.4. Safety Equipment

Under GrainCorp's Safety Management Program and 'Zero Harm | Safe for Life' campaign, Personal Protection Equipment (PPE) requirements are in place for all Terminal Operations for all employees, contractors, visitors and transport operators. Minimum PPE includes high visibility clothing, enclosed footwear, hard hats and safety glasses. Other onsite safety-related equipment includes:

- Onsite safety sign-in and inductions for all employees, contractors and suppliers
- Gas monitoring meters where required;
- Alarm systems;
- Emergency stop/shut down and alarm points;
- Chemical wash stations/showers;
- Spill kits (refer to Annex B);
- Online SDS Register (ChemAlert);
- Appropriate process and chemical identification signage;
- First aid facility and kits;
- Restricted chemical access.

7.5. Notification Procedure and Contact Details

Incident notification is detailed under the GrainCorp Incident Reporting and Investigation Standard (**HSE-3-01**). For detailed information refer to the Incident Management Classification and Escalation Process intranet document and also Annex E). Refer to these procedures to determine what information is required to be immediately reported to authorities in the event of a pollution incident.

In response to requirements under Part 5.7 of the POEO Act regarding pollution incident notifications, the following specific information and contact details are provided for Riverstone, in the event of an environmental incident.

Excerpt from NSW EPA Website - Protocol for Industry Notification of Pollution Incidents:

https://www.epa.nsw.gov.au/reporting-and-incidents/report-pollution/contacts-chemical-radiation-pollution/notification-protocol

*Recent changes to Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act) specify new requirements relating to the notification of pollution incidents. The changes take effect from 6 February 2012 and require the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to **immediately notify** each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution incident.*

If, under application of internal incident classification procedures, an environmental incident is determined to have caused or threatened material harm to the environment at the Riverstone site, the following internal and external stakeholders must be contacted immediately, in alignment with internal notification and escalation procedures.

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.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order:

- **the appropriate regulatory authority (ARA)**
- **the EPA, if it is not the ARA**
- **the SafeWork NSW**
- **the local authority if this is not the ARA**
- **Fire and Rescue NSW**

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by SafeWork NSW.

7.6. Contact Details

7.6.1. Internal and External Notification Contact Details

The following Table 7 lists the names, positions and 24-hour contact details of those key individuals who:

- are responsible for activating the plan; and
- are authorised to notify relevant authorities under section 148 of the Act; and
- are responsible for managing the response to a pollution incident.

Table 7 - Internal notification contact details

Contact Position	Contact Name	Contact Details
Auscol Riverstone Site (***business hours only***)	Site phone number	(02) 8302 7990 1800 629 476
Regional Operations Manager **NSW/ ACT**	[redacted]	[redacted]
National Operations Manager	[redacted]	[redacted]
Terminal Operator	[redacted]	[redacted]

7.6.2. External Notification Contact Details

In response to the introduction of changes to 5.7 of the POEO Act, and as part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, decisions to notify neighbours and the local community will be made in consultation with regulatory authorities (Table 8).

After consultation with the regulatory authorities, if required, the Regional Operations Manager will undertake the early warning of the immediate neighbours. The initial notification will be brief and contain only a description of the environmental threat together with instructions what to do. For example:

- *Due to a fire on site, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice.*
- *An accidental discharge occurred from the site. Emergency vehicles may possibly be present on roads leading to the terminal.*
- *Uncontrolled release of chemicals into waterway. Please avoid fishing or utilising the waterway for recreational purposes until the waterway is deemed safe.*

Table 8 - External relevant authority contact details

Authority	Local Authority	Contact Details
Fire and Rescue NSW		000 Non-emergency: (02) 9265 2999
NSW Environment Protection Authority (Environment Line)		131 555
SafeWork NSW		131 050
Local Council	Blacktown City Council	Phone: (02) 5300 6000 After Hours: 1300 133 491

7.6.3. Communicating with the Local Community

Communication and updates regarding pollution incidents will be undertaken in accordance with existing procedure as detailed in existing ERPs. provide information for communicating with neighbours and the local community, dependent upon the nature and scale of an incident. In the event of a notifiable incident, the appropriate emergency response plan and associated external communication process will be deployed.

7.6.4. Immediate Neighbours

In response to the introduction of changes to 5.7 of the POEO Act, and as part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, immediate neighbouring properties will be notified, under the direction of Emergency Services with immediate response information.

Stakeholder	Contact Details
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]

7.6.5. Riverstone Terminal Contact Details

Contact details for Riverstone Terminal are publicly available via local directories, from http://www.graincorp.com.au, https://auscol.com.au and via signage on the site's gate. GrainCorp operates a telephone complaint line during business hours. The contact details for Riverstone Terminal are as follows:

- Address: 148 RIVERSTONE PDE, RIVERSTONE, NSW, 2765
- Phone: 1800 629 476

Document	Format
Riverstone Terminal Emergency Response Procedure	Flipchart on site
Incident Reporting and Investigation Standard (HSE-3-01)	Controlled document on SharePoint

8. MINIMISING HARM TO PERSONS ON PREMISES

The following section includes actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premise should an incident occur. Persons likely to be on site include employees of Auscol, GrainCorp, contractors and sub-contractors.

At all times, minimising harm to persons on premises shall be a priority and is achieved through Engineering, Training, Administrative and PPE controls as the last line of defence. Regular health monitoring of fumigation staff is also undertaken.

Training is provided to Auscol employees and any other person entering the site so that they are aware of site hazards and processes in the event of a pollution incident. Training includes, but is not limited to:

- inductions (online),
- toolbox talks,
- simulated desktop scenarios and simulated exercises.

A record of site inductions is recorded on the eLearning online database. A record of the most recent simulated desktop scenario and the attendees are located on the Riverstone Network Drive. A full training matrix for personnel at Riverstone Terminal is maintained on site, including the requirement for attendance at the PIRMP toolbox and spill response fundamentals training. The training matrix is located in Annex F.

8.1. EMERGENCY RESPONSE – ACTIVATION OF A WANING ALARM

As a standard on site, the alarm may be raised by anyone noting an emergency situation. It is also crucial that personnel notify Terminal Manager of what has occurred, what your actions have been and any identified issues. Response actions will be initiated based on this information.

A combination of communication methods are available. They include:

- Verbal communication between employees and others
- Audible alarm
- Loud-speaker system
- Siren(s)
- Telephone - including mobiles

Electronic alarms are tested and maintained at regular intervals. Practice evacuations are conducted regularly to meet the requirements of the OHS Management System Program. The alarm system is covered during training and induction processes. Details of evacuation points are provided in Annex A.

8.2. STANDARD SITE CONTROLS

8.2.1. Engineering controls

- Fire extinguishers located throughout plant
  - 173 x CO2 3.5kg
  - 53 x CO2 5kg
  - 8 x dry chemical 9kg
  - 4 x dry chemical 4.5kg
  - 1 x dry chemical 2.5kg
  - 3 x dry chemical 1.5kg
  - 3 x external air and water 9L
  - 1 x foam 9L
  - hose reels
- Safety showers and eyewash stations located at the Pesticide and Oil Store, and at the FCOJ Plant
- Vesda early warning smoke detection system

8.2.2. Administrative controls

Administrative controls to minimise harm to persons on site include;

- Risk assessments for tasks undertaken on site
- Safe Work Method Statements
- Safety Signage across the site
- Online SDS register (ChemAlert)
- Site safety, health and environment inspection checklists
- Site Emergency Procedures booklet
- Toolbox talks, safety alerts

8.2.3. PPE

See Section 7.4.

9. Actions to be taken during or immediately after a pollution incident

Internal incident management procedures, including the Incident Management Classification and Escalation Process and ERPs provide detailed procedure as to immediate action to be undertaken during or immediately after an incident, dependent upon type and classification.

1. Assess and notify of incident if required: Follow the internal incident management procedures, including the Internal Emergency tab of the Emergency Response Procedure (flipchart). This provides detail on immediate action to be undertaken during or after an incident, dependent upon type and classification.

2. Control the incident with available response equipment and procedures.

3. Classify incident and escalate: Follow internal notification requirements and classify incidents according to the Incident Management Classification and Escalation Process. The procedure provides details on classifying emergency incidents as Level One, Two, Three, Four or Five, where Level 5 is the most critical incident.

4. Report the Incident: Follow the GrainCorp Incident Reporting and Investigation Standard HSE-3-01 (**HSE-3-01**) and report to Sphera.

As outlined in Section 7.1, the main hazards to human health and the environment that have been identified at the terminal. Refer to the list below which references the relevant Emergency Procedures (from Annex C) with the expected response:

- Spill from Tank Farm - **SPILL** Emergency Procedure;
- Truck Spill (offsite) – **TRANSPORT INCIDENT** Emergency Procedure;
- Minor chemical/ UCO spill (onsite) - **SPILL** Emergency Procedure;
- Discharge of Liquid Food Waste to stormwater – **WATER RELEASE** Emergency Procedure;
- Uncontrolled release of emissions – **AIR EMISSIONS** Emergency Procedure.

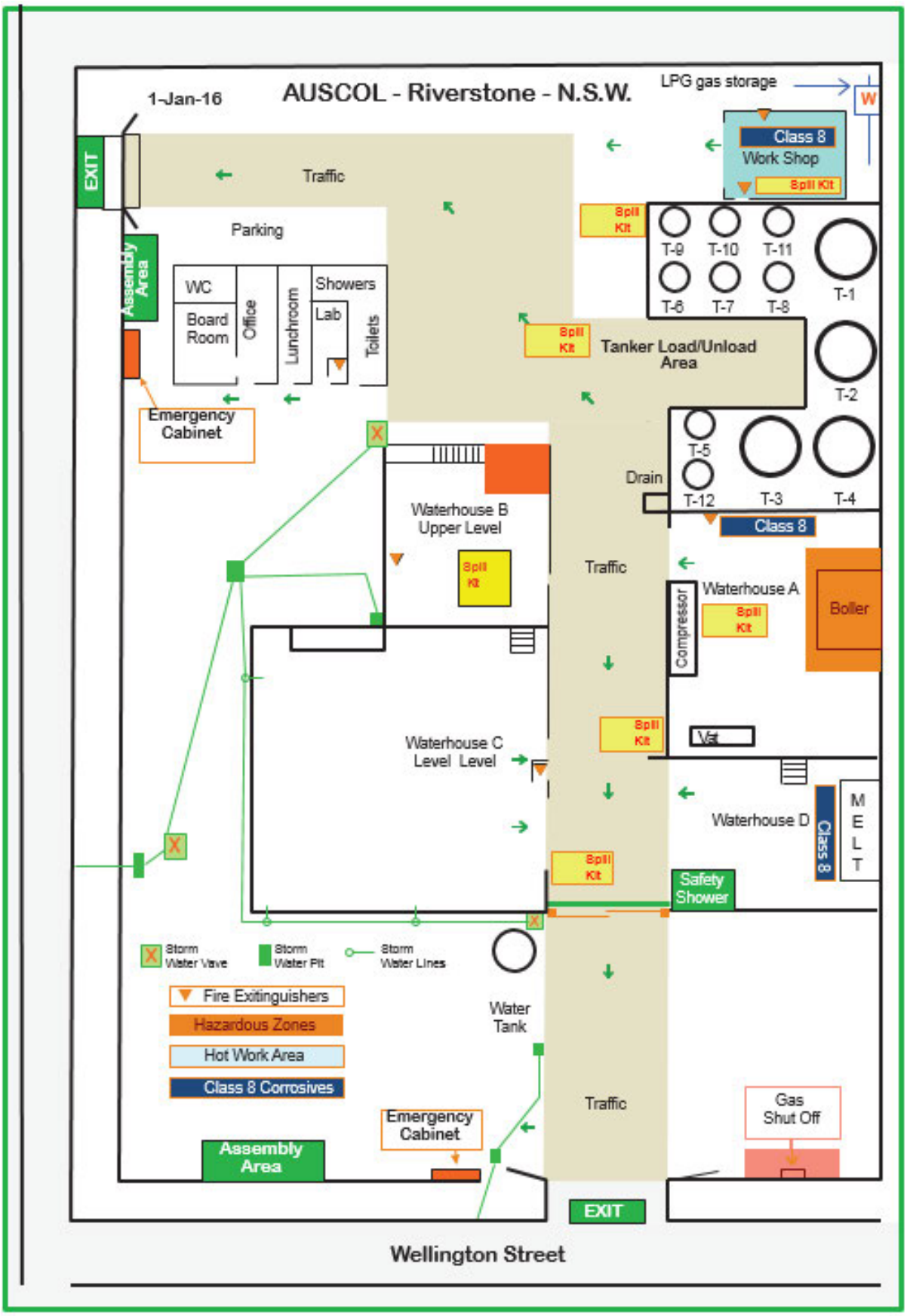
10. Staff Training and PIRMP Testing

This PIRMP will be tested annually through a desktop review and/or a practical exercise simulating where a spill or a release of chemical/gas has occurred. The practical exercise will determine the practical effectiveness of the ERP and the PIRMP and any areas for improvement.

The PIRMP will also be tested and reviewed within one month of any pollution incident occurring in the course of the site activities where it can be assessed whether the information included in the PIRMP is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

Date of Test	Participants	Method
2 Nov 2022	K. Green, T. Horsburgh, J. DaCorte, G. Webb, A. Costa	Desktop Review and Simulation
27 October 2023	K.Green, Jessica DaCorte. Craig Macdonald, Brendon Hardaker	Desktop Review and Simulation
15 October 2024	K.Green, Matt Anderton. I George. P Williams	Desktop Review and Simulation
22 October 2025	K. Green	Desktop Review and Simulation
30 September 2026	K. Green, E. Stephens, J. Pengelly, D. Fyfe, R. Peacock, E. Abalos, M. Hanslow, B. Hardaker	Desktop Review and Simulation

ANNEX A: RIVERSTONE SITE PLAN



ANNEX B: SPILL KITS

While each terminal may have a different requirement for their specific site the fundamentals for spill control will designated by the Terminal Supervisor. The Terminal Supervisor will be responsible for determining the following:-

- The type of material for the spill kit relative to the types of products stored e.g. flammable or Class 8,
- The quantity of spill kits to be used in a particular area of the site,
- The location of the spill kits in relation to site activities,
- The replenishment of used items within the spill kit,
- The amount of buffer stock on hand,
- Who is responsible for checking and reporting the status of the spill kits?



Spill Kit Contents

As a guide a general spill kit should contain the following items:-

Note: For dangerous goods refer to the class type for appropriate absorbent materials.

20 - 30	430x480mm Hazchem Absorbent Pad
4 Bags	Absorbent material
2	1.2m x 75mm Hazchem Absorbent Boom
2	3m x 75mm Hazchem Absorbent Boom
10	Contaminated Waste Bags
2 pair	Chemical Resistant Gloves
1 Roll	Barrier tape.
4	Splash Goggles
1	660L Mobile Bin
1 Roll	Packing Tape

Other practical tools to use with a spill kit.

- Squidgy for moving product and degreaser.
- Shovel for clean up.
- Broom for clean up.
- Buckets or pails for removal.

ANNEX C: EMERGENCY PROCEDURES

EMERGENCY PROCEDURES
General Instructions in the event of a:
SPILL

IF THIS HAPPENS:	DO THIS:
Small Spill or Leak (Less Than 20 Liters)	1. Shut down all operations in the vicinity of the spill/leak 2. Try to locate and correct the source of the spill/leak 3. Cover the spill with suitable absorbent material from spill kit. Ensure that you are wearing the correct PPE 4. Remove the saturated absorbent to a safe place 5. Record in incident log
Large Spill/Leak in the Terminal	1. Shut down all operations in the vicinity of the spill/leak 2. Stop all road tanker and process operations as applicable 3. Stop flow of product from source if possible 4. Ensure bund valves are closed 5. Ensure inlets to storm water interceptor is closed 6. Immediately notify Terminal Supervisor of problem 7. Terminal Supervisor is to assume the role of Incident Controller 8. Incident Controller is to notify emergency services if assistance is required **9. Incident Controller or General Manager to notify SHE Team in order to determine if incident is notifiable to regulators (e.g. EPA)** 10. If required, prepare emergency equipment **only if you are certain it is safe to do so**. 11. Assist in recovery of product as directed
Large Spill/Leak to the River	1. Shut down all operations in the vicinity of the spill/leak 2. Stop all operations 3. Stop flow of product from source if possible 4. Immediately notify Terminal Supervisor of problem 5. Terminal Supervisor assumes role of Incident Controller 6. Incident Controller is to notify the General Manager and request assistance as required **7. Incident Controller or General Manager to notify SHE Team in order to determine if incident is notifiable to regulators (e.g. EPA)** 8. Assist in recovery of product as directed

General Environmental Controls

- Monitoring of Bund area valves and contents.
- Spill kit location for easy quick access at loading areas.
- Report any usage of spill kits for refilling.
- Appropriate PPE used for the products handled.
- Storm water valves to remain closed unless authorised to open by Supervisor.
- Report any incidents, near misses to Management for corrective action.
- Permit system to describe any special assessment requirements.
- Keep all drains and pits clear of debris.

EMERGENCY PROCEDURES
General Instructions In The Event Of A:
TRANSPORT INCIDENT

IF THIS HAPPENS:	DO THIS:
Transport Incident Product Release	▪ Immediately stop operation. ▪ Advise others by radio for assistance. ▪ If safe to do so contain the incident. ▪ Implement External Emergency Response for dangerous goods over 200ltrs. ▪ Close down vehicle access to the area. ▪ Use barriers to redirect traffic to other areas. ▪ Implement appropriate emergency response procedure e.g. Spill, Emissions, Noise, Land etc.
Complaints	**Internal:** ▪ Terminal Supervisor to investigate the incident and implement corrective action. ▪ Implement recommendations from investigations. ▪ Follow up review with all staff as to the outcome. **External:** ▪ Stop the transport activity if it is safe to do so. ▪ Terminal Supervisor to investigate the Transport Incident and implement corrective action. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Inform customers if they are affected. ▪ Enter incident into SpheraCloud

General Controls for Transport Incident.

- Transport Driver inductions and where appropriate applicable training for the driver.
- Transport driver to wear appropriate PPE for the operation.
- Auscol vehicles to have a spill kit for emergency use.
- Road tanker inspections for product compatibility, signage, tanker safety compliance e.g. fall protection, no leaks, no visible damage, no breakdown during loading.
- Report any observations to the Manager / Supervisor for action on non compliance.
- Record findings in the incident log for any observations.
- Terminal Supervisor for issues that need addressing put into SpheraCloud.
- **EPA Ph. 131 555 or (02) 9995 5555**

EMERGENCY PROCEDURES
General Instructions in the event of:
Water Release

IF THIS HAPPENS:	DO THIS:
Emergency Release of Storm Water	From rain buildup there may be a requirement for release of storm water to the environment. ▪ Management authority for release. ▪ Visual inspection of pit and drains prior to release. ▪ If clear and no residues on water then release to the environment. ▪ If not clear then remove any residues until clear then release. ▪ Check the outlet if available to confirm no contamination. ▪ Record open & close times and visual inspection times in the incident log book. ▪ Release and monitor at all time while the valve is open. ▪ Take a sample of the water released. ▪ Twice a year the sample must be tested externally for analysis.
Complaints	**Internal:** ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Follow up review with all staff as to the outcome. **External:** ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Stop activity if due to breakdown and it is safe to do so. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Enter incident into the SpheraCloud.

General Controls for Water Release:

- Rain water to be controlled for release by bunding for storage tank areas, loading areas and process areas.
- Contractor activities to identify soil erosion and run off to the environment.
- Storm water drains to signposted and locked with signage for Management Authorisation.
- Releases to the environment to be under full monitoring of the activity.
- Drains and gutters to be kept cleaned.
- Bund area reports to be actioned for any observations requiring improvements.
- Reuse rain water where practicable.
- **EPA Ph. 131 555 or (02) 9995 5555**

EMERGENCY PROCEDURES
General Instructions in the event of
AIR EMISSIONS

IF THIS HAPPENS:	DO THIS:
Extreme Excessive Air, Dust, Smoke, Odours, Vapours	▪ Immediate investigation of air emission. ▪ If Safe to do so shut down offending operation / equipment ▪ Use PPE – Appropriate respirator to enter areas that have excessive exposure levels. ▪ After shut down implement repairs, replacement or admin controls. ▪ Enter incident into the SpheraCloud.
Complaints	**Internal:** ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Follow up review with all staff as to the outcome. ▪ **External:** Supervisor / Supervisor to investigate the source and implement corrective action. ▪ Stop activity if due to breakdown and it is safe to do so. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Enter incident into the SpheraCloud.

General Controls for Air Emissions:

Elimination:	▪ Does the activity need to be done?
Substitution:	▪ Can other equipment be used that has less noise emissions.
Engineering:	▪ Modify or repair the equipment to an acceptable exposure level.
Administration:	▪ Control the timing of the operation to a time that has less impact on the community placement of any warning signs for operations. ▪ Operators to have appropriate product training for potential leaks to atmosphere. ▪ Monitoring of site operations with air emission level tests for the appropriate release.
PPE:	▪ Issue appropriate respirator protection for areas of operation.

Record findings in the incident log for any low level air emissions.
For any excessive emissions levels that need addressing put into SpheraCloud**.**
EPA Ph. 131 555 or (02) 9995 5555

EMERGENCY PROCEDURES
General Instructions in the event of
Excessive Noise

IF THIS HAPPENS:	DO THIS:
Extreme Excessive Noise	▪ Immediate investigation of noise emission. ▪ If Safe to do so shut down offending operation / equipment ▪ Use hearing Protection to enter areas that have excessive noise levels. ▪ After shut down implement repairs, replacement or admin controls. ▪ Enter incident into SpheraCloud.
Complaints	**Internal:** ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Follow up review with all staff as to the outcome. **External:** ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Stop activity if due to breakdown and it is safe to do so. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Enter incident into the SpheraCloud.

General Controls for Noise.

Elimination:	▪ Does the activity need to be done?
Substitution:	▪ Can other equipment be used that has less noise emissions.
Engineering:	▪ Modify or repair the equipment to an acceptable noise level.
Administration:	▪ Control the timing of the operation to a time that has less impact on the community placement of any warning signs for operations. ▪ Monitoring of site operations with noise level tests.
PPE:	▪ Issue appropriate respirator protection for areas of operation.

Record findings in the incident log for any low level nuisance noise.
For any excessive noise levels that need addressing put into SpheraCloud
EPA Ph. 131 555 or (02) 9995 5555

EMERGENCY PROCEDURES
GENERAL INSTRUCTIONS IN THE EVENT OF
WASTE

IF THIS HAPPENS:	DO THIS:
The waste generated at a Auscol site is in relation to the customer supplied products therefore as a result there is little produced by the terminal. ***It is a very low likelihood that an emergency will be initiated from a waste related incident.***	
Waste release to the Environment	▪ Immediate investigation of waste release. ▪ For general solid waste clean site for disposal. ▪ If Safe to do so use appropriate supplied container. ▪ Use PPE – to clean up then implement repairs, replacement or admin controls. ▪ Enter incident into SpheraCloud. All prescribed waste to be kept separate for licensed pick up and disposal.
Waste Controls	**For General Waste:** ▪ All waste to be place in containers that are appropriate for the type of waste. ▪ All containers to be kept closed to avoid pests, odours, and waste being blown out of the container. ▪ Waste tracking to confirm EPA Licensed approval. **For Prescribed Waste:** ▪ To be handled as per operating instructions. ▪ Oils, Fuels and Rags to be disposed of by EPA Licensed contractor. ▪ Customer supplied product waste under control of customer but also must be disposed of by licensed contractor. ▪ Waste tracking to confirm EPA Licensed approval. ▪ All documentation to be checked and records kept.
Recycling • Avoid • Reduce • Reuse • Recycle • Recover • Treatment and Disposal (Least Preferred)	▪ Avoid printing of unnecessary documents/emails. ▪ Re-use the reverse side of paper. ▪ Separate paper/cardboard waste for recycling. ▪ Metal recycling by a metal recycler. ▪ Report any wastage to management for action. ▪ Keep records of waste amounts for disposal. ▪ Minimize the amount of energy usage by good supervision. ▪ **EPA Ph. 131 555 or (02) 9995 5555**

ANNEX D: GRAINCORP RISK ASSESSMENT MATRIX

RISK ASSESSMENT MATRIX

LIKELIHOOD / MOST LIKELY CONSEQUENCE	**Almost certainly will occur** (Occurrence expected to occur on a weekly basis or more frequently)	**Good chance it could occur** (Occurrence expected to occur more than once in 3 months, but less than once a week)	**Likely to occur** (Occurrence expected to occur more than once a year, but less than once in 3 months)	**Unlikely to occur** (Occurrence expected to occur more than once in 3 years, but less than once a year)	**Extremely unlikely to occur** (Occurrence has not occurred and is expected to occur less than once in 3 years)
Disastrous	**Score 25**	**Score 24**	**Score 22**	**Score 19**	**Score 15**
Critical	**Score 23**	**Score 21**	**Score 18**	**Score 14**	**Score 13**
Serious	**Score 20**	**Score 17**	**Score 12**	**Score 9**	**Score 6**
Moderate	**Score 16**	**Score 11**	**Score 8**	**Score 5**	**Score 3**
Minor	**Score 10**	**Score 7**	**Score 4**	**Score 2**	**Score 1**

Level of Risk	Risk Score	Recommended Action
High Risk	**20-25**	Immediately notify Site Manager Immediately implement controls to reduce risk before task commences Long-term control strategies to be implemented & documented in Site Improvement Plan
Medium Risk	**13-19**	Notify Site Manager Dept mgers to review risk ass to ensure all possible control measures are identified & implemented Communicate hazard/aspect details to affected personnel Control hazard/aspect before task commences Communicate/review risk ass at appropriate consultative committees (may also be in SHE IMP)
Low Risk	**7-12**	Notify Department Manager Implement controls where possible Communicate hazard/aspect details to affected personnel Review risk assessment as scheduled or as change occurs
Very Low Risk	**1-6**	Notify your direct manager/team leader Communicate hazard/aspect details to affected personnel Review risk assessment as scheduled or as change occurs

HIERARCHY OF CONTROL

Engineering Controls

1st Elimination / Design Out - Try to ensure that hazards/aspects are "designed out" when new materials, equipment and work systems are being planned for the workplace.

Substitution/ Replacement - Remove the hazard/aspect or substitute with less hazardous materials, equipment or substances

3rd Safer / Redesigned Process - Adopt a safer/less environmentally harmful process.

4th Isolation - Enclose or isolate the hazard/aspect through the use of guards or remote handling techniques.

5th Effective Ventilation - Provide effective ventilation through local or general exhaust ventilation systems.

Administrative Controls

6th Administration - Establish appropriate administrative procedures such as:

- Process documentation & SOPs
- Job rotation to reduce exposure or boredom; or timing the job so that fewer workers are exposed;
- Routine maintenance and housekeeping procedures;

or

- Training on hazards and correct work procedures.

Personal Protective Equipment

7th Personal Protective Equipment - Provide suitable and properly maintained Personal Protective Equipment and training in its use.

ANNEX E: GRAINCORP INCIDENT MANAGEMENT CHART

Incident Management Classification and Escalation Process

This matrix is designed to ensure that critical incidents are immediately notified and appropriately escalated within the organisation. The matrix allows our people at the front line to manage the incident while ensuring that senior management and, if appropriate, the CEO and members of the Board, are informed in a timely manner.

Step 1: Use the **Incident Classification Matrix** below to classify the incident (default to the higher level if in doubt).

Step 2: Use the **Incident Notification Table** below to determine who needs to be notified.

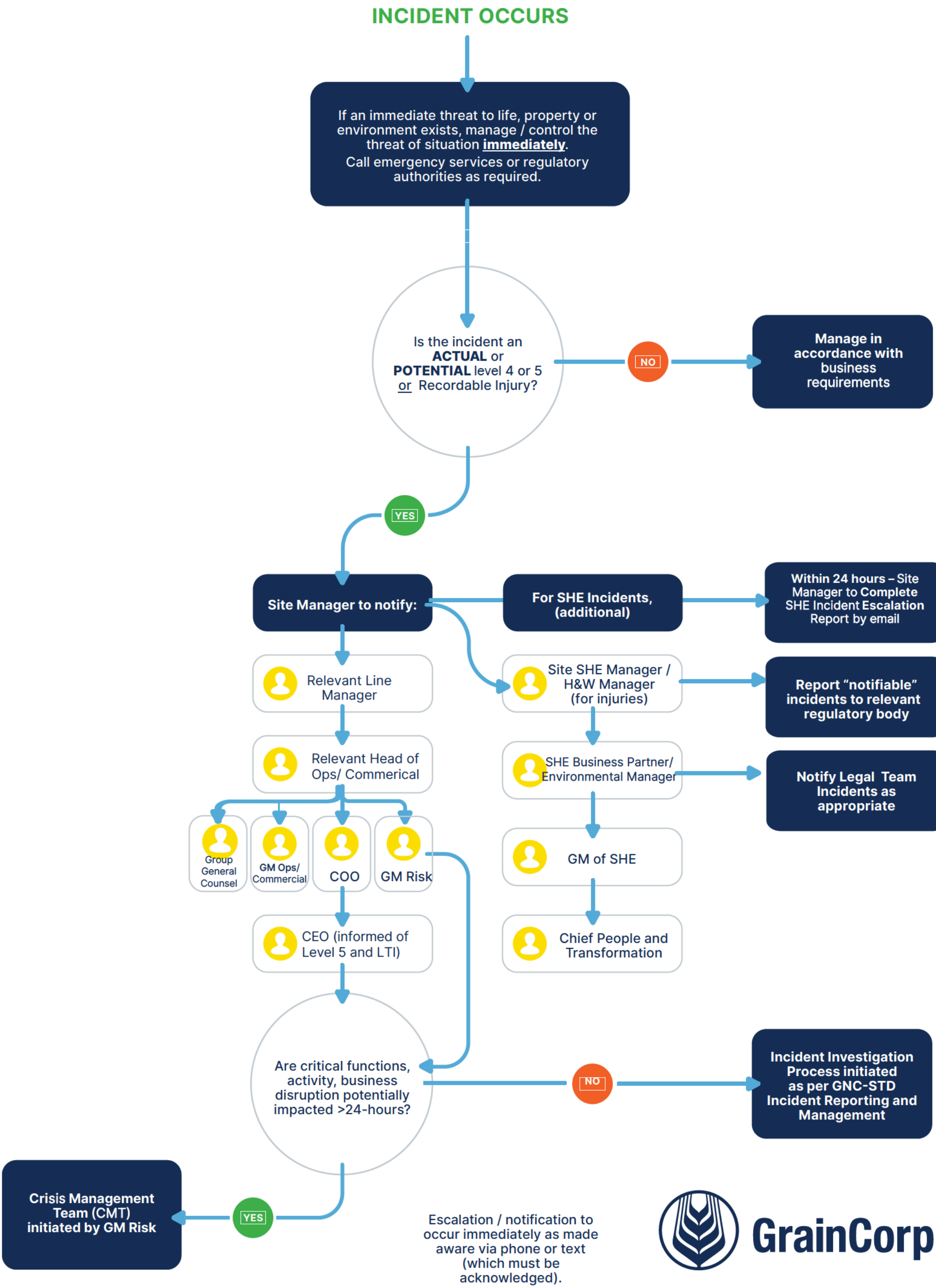
- ***Please note*** that some trigger events need another trigger in that section to apply.

Note: a 'Critical Incident' is defined as a level 4 or 5 incident.

INCIDENT CLASSIFICATION MATRIX Actual or Potential (Worst Credible) Consequence	**Extreme (Level 5)**	**Major (Level 4)**	**Moderate (Level 3)**	**Minor (Level 2)**	**Negligible (Level 1)**
Safety	Fatality or significant permanent injury. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 5 section.	Injury resulting in a loss of one or more full shifts – (ie a Lost Time Injury – LTI) Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 4 section.	Injuries requiring Medical Treatment (MTI) but where no time was lost. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 3 section.	Injury requiring First Aid treatment only. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 2 section.	Injury requiring no treatment – report only.
Health	Severe illness or chronic exposure resulting in fatality or significant life shortening effects.	Illness or significant adverse health effect needing a high level of medical treatment or management.	Mild illness or health effect and/or some functional impairment that needs some treatment but is usually easily managed, medically.	Minor illness or health effect with no functional impairment, treatment is optional, with no medical intervention.	Illness or effect with limited or no impact on ability to function – no treatment necessary.
Environment	Loss of containment / spills outside site boundary meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Destruction of, or permanent damage to, important populations of habitat, species, or natural environment.	Loss of containment / spills outside site boundary meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable medium-term (e.g. temporary) impact on habitat, species or natural environment.	Loss of containment / spills within site boundary meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable short-term (e.g. temporary) impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised but immaterial impact on or impairment of habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. No discernible impact on or impairment of habitat, species or natural environment.
Property Damage	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively >$500,000.	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between $50,000 and $500,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between $10,000 and $50,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively <$10,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, deemed negligible.
Assets and Supply Chain	Extended loss of use of assets, significant supply chain / business interruption or widespread and sustained electronic systems outage with a time impact of >24 hours or total financial impact >$1M.	Extended loss of use of assets, significant supply chain interruption / business interruption or widespread and sustained electronic systems outage with a time impact of >12 hours or total financial impact between $1M and $500,000.	Loss of use of assets, supply chain / business interruption or sustained electronic systems outage with a time impact of >6 hours or total financial impact of between $500,000 and $200,000.	Loss of use of assets, supply chain / business interruption or electronic outage with a time impact of >2 hours or total financial impact of between $200,000 and $50,000.	Loss of use of assets, supply chain / business interruption or electronic outage with negligible time impact or financial impact <$50,000.
Regulatory & Legal	Is 'notifiable' to an Authority / Regulator AND the Authority / Regulator attends the scene of the incident AND/OR commences an investigation. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual / potential for a civil penalty or fine the maximum of which is > $50,000 or a criminal penalty. All incidents of suspected or actual fraud, bribery or corruption, events of significant illegal activity, or data breach / privacy breach events.	Is 'notifiable' to an Authority / Regulator or the Authority / Regulator issues a notice or intends to/or attends the scene / conducts an inspection. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual/potential for a civil penalty or fine the maximum of which is <$ 50,000. Significantly exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law that may result in a minor penalising action (quantum not determined), and any intervention by an Authority or Regulator is limited to a field report (or similar). A visit by a regulator following a complaint that results in no penalty but where a report is issued with follow up action. Exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law with no penalising action, and no intervention by an Authority or Regulator. A visit by a regulator following a complaint that results in no penalty or follow up action. Legislated criteria or state policy limit at risk of not being met.	Minor breaches of company policy or procedure by individual staff members with no external actions or impact.
Community / Reputation	Extended national adverse media coverage. Brand devalued. Customers/ suppliers abandon relationship..	Sustained adverse, local to national media reference. Brand image has potential of being tarnished. Minor disruption to public activities or a third party's or our own business operations.	A clustering of complaints. Potential adverse local media reference. Potential for brand to be questioned.	Isolated complaint from an individual with the potential for adverse community discussion. Isolated adverse local media reference.	Isolated complaint from a local individual.
Product Safety, Quality or Contamination	A product recall or product withdrawal is planned or has been initiated following determination that the affected product could harm human health.	A product contamination, product specification or product quality failure event that has the potential to impact customers or the public with a financial impact >$200,000.	A contamination, specification or quality incident that results in a potential or actual claim (or rework) of up to $100,000 and can be resolved internally (i.e. without external expert support).	A customer complaint or incident resulting in a potential or actual claim (or rework) under $5,000 (e.g. credit note or product reject), which has no harm to human health or the public.	Minor incident with no resulting impact on the customer.

INCIDENT ESCALATION	**CRITICAL INCIDENTS**		**NON-CRITICAL INCIDENTS**		
	Extreme (Level 5)	**Major (Level 4)**	**Moderate (Level 3)**	**Minor (Level 2)**	**Negligible (Level 1)**
Safety **Health** **Environment**	**CRITICAL SHE INCIDENT** Site/Plant/Terminal Manager to immediately notify: • SHE Manager/ Environmental Advisor (for environmental incidents) • Health and Wellbeing Manager (for injuries) • Regional Operations Manager or Ports Operations Manager in ECA • National Operations Manager National Operations Manager to follow **Critical Incident Escalation Process**		**NON-CRITICAL INCIDENT** Incident to be managed by local management as part of BAU activities. Standard Incident Management investigation and resolution protocols apply.		
Property Damage **Assets and Supply Chain** **Regulatory & Legal** **Community / Reputation** **Product Safety, Quality or Contamination** **External Disasters**	**CRITICAL INCIDENT** Site/Plant/Terminal Manager to immediately notify: • Regional Operations Manager or Ports Operations Manager in ECA • National Operations Manager National Operations Manager to follow **Critical Incident Escalation Process**				

Incident Management Chart



ANNEX F: TRAINING MODULE

Training Element	Relevant Section in this Plan	Competency Required
Responsibilities for Environmental controls:- Manager Supervisors Operators	Sect 2 Responsibilities	Competency Assessment
Environmental concerns for:- Water, General waste, Noise, Air Emissions, Soil Contamination.	Sect 4 Environmental Concerns	Competency Assessment
Location of Terminal:- Drains, Strom water, Separator pits, Spill kits.	Site drawings Terminal inspection Terminal site maps where listed.	Competency Assessment. Practical description of location.
Authority and control of locked drains and valves.	State Manager guidelines. Routine Activities	Competency Assessment
Management Strategy for:- Air, Water, Soil.	Sect. 6.0 Emissions	Competency Assessment
Action on spill response:- PPE correctly identified, Control of spill, Record of incident SpheraCloud	Product Safety Assessments Product Safety Cards MSDS SpheraCloud	Competency Assessment
Administration: Location of Environmental Plans Location of Emergency Plans	Terminal Emergency Plan Terminal Environmental Plan	Competency Assessment. Practical description of location.